



The countryside charity
Leicestershire

Charity Number: 1164985

CHARNWOOD LOCAL PLAN EXAMINATION

Matter 8: Infrastructure and Transport

Additional Submission from CPRE Leicestershire

January 2023

Representation Number: 340

We would like to submit an update to our response on Matter 8 (RN 340) given the time interval, several factors arising and documents that have been made available since then.

In our previous submissions we tried to show how planning and transport must be considered together as the type and location of development has a fundamental impact on where and how people travel; as does the provision of infrastructure.

We would add the following:

Re: Issue 1 - The Infrastructure Delivery Plan

Question 8.1

Most of the transport projects identified in the Dec 2021 IDP have been withdrawn. That version and the original IDP said that the transport measures included in it were essential. The updated June 2022 IDP now includes vague local Transport Strategies for North of Leicester, Soar Vally and Loughborough/Shepshed. It is unclear what will emerge from these or how they would be phased or delivered. Many costs are shown as 'tbc'. It is not clear how any costs would be apportioned between developments or how delivery could be guaranteed. An examination of this aspect is vital.

Question 8.2

The transport elements in the Delivery Schedule of the June IDP supersede those in Appendix 3. See Answer to 8.1.

Question 8.3

Leicestershire County Council is one of several authorities nationally now encountering significant problems with the delivery of transport infrastructure, particularly that which is associated with developments.

The County Council has now recognised that it is in a dire financial position, made much worse, by making commitments to fund road schemes; now hugely more expensive than anticipated. It also realises that it will not be able to fund future projects without guaranteed funding up-front and is proposing to seek additional contributions from developers by working in conjunction with its local planning authorities. Statutory duties will take precedence for funding over other functions and that it may not be possible to mitigate the impact of development on the road network.¹

Following a flawed assessment process, Leicestershire CC decided to make the A6 from Leicester to the M1 at Kegworth its top priority as part of the Major Road Network (MRN). Most of this falls within Charnwood and it goes through Loughborough and Hathern. There is no clarity regarding what is proposed or what it hopes to achieve or cost. There is no option to provide a bypass to Loughborough.

Against this developing background, CPRE has continuing concerns. Plans for the delivery of appropriate transport infrastructure need to be examined in detail.

Re: Issue 2 - Transport

Question 8.4

There is still no sign of any effective commitment to the delivery of better public transport or active travel. The proposed Major Modifications include the substitution of the word 'excellent' with 'good' accessibility by non-car modes. Good is not defined and therefore it is just as meaningless.

The bus service between Cossington and Leicester was withdrawn in August. A further 357 houses have recently been given outline permission there in addition to the 130 proposed on site HA59. There is no way Cossington could be said to have good accessibility without a car. It has negligible facilities: this is typical, but is ignored.

¹ These issues were the subject of a report, *Managing the Risk Relating to the Delivery of Infrastructure to Support Growth*, discussed by Leicestershire County Council Cabinet at its meeting on 25th November 2022. <https://politics.leics.gov.uk/documents/s172416/FINAL%20-%20Managing%20Growth.pdf>

Question 8.5

There is now even more uncertainty regarding the possibility of a coordinated and strategy led approach to transport particularly having regard to sources of funding and the lack of clear proposals.

We note a statement in National Highways (NH) response to Q8.5: "*the proposed developments in the Charnwood Local Plan would have an adverse impact on the operation of the M1 J23 and along the A46 Corridor...*" NH is awaiting further detail of the mitigation and says it is "*important to note that the costs and timings of some improvements are likely to be subject to variation, particularly those where the delivery would be the responsibility of other parties.*"²

In a letter dated 28th September 2022 from NH to Ian Kemp, the Programme Officer, there was reference a note which NH said provided the evidence on which Leicestershire CC had based "*their simplistic approach to the prospective reduction in demand for highway road space due to the imposition of different public transport measures*".³

We have attempted to obtain a copy of the note by FOI to see what had been proposed but this has been refused. An FOI for this to Leicestershire CC and NH was refused on the grounds that it "*relates to material which is still in the course of completion, to unfinished documents or to incomplete data.*"

We consider that as NH had formulated a response based on it, the argument that it was still in the course of completion carried little weight. We suggested Leicestershire CC should submit it in full to the inquiry so the NH response could be seen in context.

Question 8.6

See our answers to Q 8.1 to 8.3. NH also notes the difficulty of linking sites to mitigation measures.

Question 8.7

The status of modelling is now more unclear than ever. The extent to which modelling prioritises alternative modes or effective planning as a serious option to reduce the need to travel is unknown. There is no transparency of the inputs or process.

² National Highways: Hearing Statement Matter 8 – Infrastructure and Transport.

³ Letter 28 September 2022 from National Highways to Ian Kemp with reference to technical note from Leicestershire County Council named 'Environment and Transport – Commissioning Framework, High Level Strategic Growth Plan – Technical Note 001, Evidencing Highway Reduction Factors Associated with Public Transport Measures dated 22 August 2022.

https://www.charnwood.gov.uk/files/documents/matter_10_written_statement_national_highways/Matter%2010%20Written%20Statement%20-%20National%20Highways.pdf