The countryside charity
Leicestershire

Charity Number: 1164985

CHARNWOOD LOCAL PLAN EXAMINATION

Matter 8: Infrastructure and Transport

Submission from CPRE Leicestershire

June 2022

Representation Number: 340

Issue 1 - The Infrastructure Delivery Plan

Question 8.1

Does the Infrastructure Delivery Plan (SD/10) contain the full range of infrastructure to support the development proposed in the Plan?

The Introduction makes it clear that the achievement of high standards of sustainable development places greater expectations on developers and providers of infrastructure. The IDP shows the emphasis is to seek infrastructure that facilitates the growth of traffic with very little commitment to improving walking, cycling and public transport.

How will it be reviewed and kept up to date?

Statements in TP/5 and SCG/5 suggest that there could be problems with delivering the infrastructure considered necessary. It is relying on funding streams which are not identified or certain. It is also evident that the IDP has not paid sufficient regard to reducing the need to travel or mitigating climate change. It is inevitable that it will need to be reviewed very soon.

Question 8.2

Does the Infrastructure Delivery Schedule (Appendix 3 of the Plan) enable a coordinated and strategy led approach to the delivery of new and improved infrastructure to support planned growth?

There is no evidence of any co-ordination of delivery with planned growth.

Policy DS1 (Implementation of Spatial Strategy) refers to development that could prejudice the delivery of infrastructure set out at Appendix 3. Many of the items in Appendix 3 are ill-defined and it is subject to review, so it is not clear how this would work in practice.

Can the priorities, costs and funding sources for the different types of infrastructure be easily identified from the Schedule?

The Schedule shows all the non-strategic transport infrastructure is deemed to be 'Essential'. Note 4 shows the highways infrastructure was conceived in a very short time period in early 2021. The speed of the process could not have enabled a proper understanding of the practical issues and constraints. As such the costs shown must be regarded as merely a ball-park figure with a very high probability of error.

Furthermore, SCG/5 Transport (4.2) lists many factors that still need to be resolved regarding the impact and value for money of all the mitigation measures proposed. (4.3) states that more work is required to identify sustainable transport opportunities to support a shift from cars to more sustainable modes. This recognition is very welcome, but it comes far too late in the process. It should have been considered from the outset.

With regard to funding sources, many of the non-strategic transport items listed in the Schedule simply state "*S.106 developer contributions / local authority highway funding*". It is not clear how the funding would be split between S106 and the LHA.

SCG/5 (4.5) states that *"The parties will seek to explore all potential routes for funding and will continue discussions to ensure that the appropriate evidence to access all funds is provided".*

It is not clear when such evidence could be provided. The total cost of the local transport schemes listed is over £87million. With regard to Note 1 of the Schedule it seems strange that it includes schemes that are already included in Section 106 Agreements for the approved 'SUEs'.

SCG/5 (4.8) notes that Leicester City Council has raised issues of soundness in relation to several CLP policies that we have criticised: CC5, INF1 & INF2. The impact of major development within the city in close proximity to Charnwood has been a concern for decades and it has not been addressed. A recently completed development at Ashton

Green, just south of Thurcaston was permitted without any facilities or a bus service. More development is now proposed in the Leicester Local Plan.

Question 8.3

Will Policy INF1 be effective in securing new and improvements in capacity to existing infrastructure to support proposed development and are any main modifications necessary for precision and effectiveness including in relation to:

a. Including a cross reference in Policy INF1 to the Infrastructure Delivery Schedule in Appendix 3 of the Plan

….

c. The use of S106 legal agreements to fund highway improvements

d. Joint working to address cross boundary infrastructure needs and capacity.

The very extensive modelling work outlined in (TR/5) is highly unusual. The highway authorities and Midlands Connect have concluded that the SRN in the vicinity of Leicester is a major problem and that it must be tackled by adding extra capacity; despite this adding to the problems while ignoring climate change mitigation and the environment.

The Traffic Forecasting Report (EB/TR/11) details some of the assumptions used. A mode share analysis (3.4) shows an increase in highway share from 2014 to a new 2037 baseline. The 2037 baseline includes the Lubbesthorpe 'SUE' and the three Charnwood 'SUEs' (excluding 925 at NEL). The Active Mode share of 26% for Charnwood in 2014 seems far too high as most 21st Century development has very few or no local facilities. A figure no higher than 10% would seem much more representative for the developments in the locations proposed.

Total network time and distance statistics can provide an insight into how the road network copes with the forecast growth. Table 3.10 shows a 29% increase in distance in the PM peak results in a staggering 81% increase in journey time in 2037. This is because the model is struggling to cope with the extra traffic. The additional Local Plan development is very small compared to the 2037 baseline but this shows a further 15% increase in time arises from Development Option 2. This is discussed in 3.6 although many of the statements are very questionable and reveal both the limitations of modelling and a lack of understanding of local traffic movement and constraints.

SRN Issues (EB/TR/6) provides some background to the operation of the Strategic Road Network. It rightly recognises (3.5) what it calls 'junction hopping', where local traffic uses the SRN. While it states that the modelling shows that development in Charnwood

will only increase the flow in the M1 slightly (4.14), this is because the route is congested in the model.

Increasing the capacity of the SRN will encourage traffic growth and junction hopping. All of the junctions on the M1 in Leicestershire have been altered (some significantly), as have those on the A46 Leicester Western Bypass. More changes are being sought through S106 Agreements for example to the A46/A6 junction at Broadnook. TP/5 5.1 is proposing a further investigation of Junction 23; which was altered in the last year! This is further that proof that the failure to properly consider sustainable transport from the outset is creating a situation where more highway capacity is seen as essential.

The cost of the 8 'Strategic' proposals in the Infrastructure Schedule is around £250million. All show Delivery as 'tbc'. Six of these are shown with a delivery period starting between 2026 & 2031. The other two are shown as starting after 2031; all run through to 2037.

Highways England 2021-22 Delivery Plan Update *(Examination Reference)*[1] is an update of the HE Delivery Plan 2020-25 (EB/TR/15). Annex C of the Update is an 'Enhancement scheme list'. It notes that a scheme on the A5 near Hinckley has been cancelled. 'Smart Motorways' are now being reviewed. A proposal to extend and widen Newark Bypass is the only scheme in the Midlands shown with a starting date. Annex D is a 'Pipeline of proposed future schemes'. Highways England point out that the inclusion of schemes in the 'pipeline' does not mean they are guaranteed to progress; as the A5 scheme shows.

There are two schemes in the Delivery Plan relevant to Charnwood: 'M1 North Leicestershire extra capacity' and 'M1 Leicester Western Access'. The latter is looking at the M1 between Junction 21 and 21a, where the Leicester Western bypass joins the M1. This was recognised as a problem before the Leicester Western Bypass opened in 1995. Millions of pounds have been wasted on studies and some tinkering but the constraints have since increased.

A list of Government contracts earlier this year showed the value of Leicester Western Access as £564m, somewhat higher than the £20m in the Infrastructure Delivery Schedule. The £20m figure is possibly for yet another assessment. There is no realistic scheme that would solve the congestion problem on this section of the M1 and one consequence would be to encourage more junction-hopping along the M1 and A46 and increase traffic overall.

[1] *See: CPRE Matter 8 Highways England Delivery Plan Update 2021-22*

This is further proof that a Plan which relies on additional road capacity is not meeting its legal obligations and why it needs substantial modifications.

Issue 2 - Transport

Question 8.4

What is the role of sustainable transport modes in supporting planned growth and has the effect of modal shift supported by Policy CC5 been taken into account in the transport modelling and studies (EB/TR/11, 12 & 13)? If so, how?

There is no sign that there has been any serious attempt to consider sustainable transport in the modelling. This is despite it being enshrined in government and local polices for over thirty years. The 2004 and 2011 Charnwood Local Plans had very similar objectives and policies seeking to reduce the need to travel while encouraging modal shift through development patterns and improved alternatives.

The Charnwood Climate Change Strategy EB/CC/3 encourages a sustainable pattern of development supported by a low carbon transport infrastructure. TP/5 shows an emphasis on high carbon roads and the modelling shows the problems with that approach.

As we explained in response to Matter 3 there does not appear to have been any serious consideration of the need to mitigate climate change or to consider from the outset the importance of ensuring that development and transport are designed to support sustainable travel. Despite numerous references to cycling, walking and public transport the balance of spending identified in the infrastructure schedule is hugely weighted towards high carbon roads to facilitate traffic growth. This also applies to the three supposedly sustainable urban extensions 'SUEs' which have been approved.

Question 8.5

Does Policy INF2 (Local and Strategic Road Network) set out a coordinated and strategy led approach to all types of transport in the Borough?

Policy INF2 states that "We will support development that:" and this is followed by three bullet points. It is not clear whether all or some of the bullet points apply.

Bullet 1 refers to a "*robust transport assessment of the impact of the development on the road network, including any cumulative impacts*."

Examination of previous transport assessments shows no evidence that the cumulative impacts have been considered. While such traffic assessments are often voluminous,

they are by no means robust. There is a lack of evidence of any assessment of earlier TAs to see how outcomes match the assumptions.

Bullet 2 refers to infrastructure which supports sustainable transport choices being prioritised before any improvements to the local or strategic road network.

There is no evidence of any such prioritisation and it is not clear how it would work in practice. It is obvious that the balance of funding in the Infrastructure Schedule does not reflect this approach. Neither does the failure to properly assess what is needed to support sustainable travel.

Bullet 3 refers to *"the reasonable costs of measures required to mitigate the cumulative impacts of the development strategy upon the local and strategic road network."*

This is wide-open to interpretation. What is a reasonable contribution? How would it be assessed? By whom? Who else would need to contribute?

Question 8.6

What is the likely effect of the proposed scale and distribution of development on the strategic and local highway network and key junctions?

The extensive amount of traffic modelling and the comments in the various reports show that the road network is overstressed and the proposed development will make it worse. All the local transport items in the Infrastructure Schedule are deemed to be 'Essential'.

Have the necessary improvements and/or mitigation measures to the strategic and local highway network been identified in the Plan and the Infrastructure Delivery Plan, including costs and timing/phasing where necessary?

TP/5 refers to Technical Note 2 which shows that work on a preferred mitigation package started with a 'long list of interventions' commencing in January 2021. Technical Note 3 (Jan 2021) recognised the congestion caused by the proposed developments and reports that it identified areas where it considered 'more strategic traffic' is using the local road network as a result of congestion on the SRN. It does not define 'more strategic traffic' so it is not clear what is meant by this statement or how critical it is. The modelling process is not transparent so the extent and sensitivity of this cannot be verified.

Revised Technical Note 3 (April 2021) sought to address comments made by 'stakeholders' on the various reports. It is not clear what comments were made or what weight was given to them.

Question 8.7

Does the transport modelling undertaken so far (EB/TR/11, 12 & 13) enable specific impacts on the highway network to be identified, for mitigation measures to be developed in response to that modelling and then required as part of the Infrastructure Delivery Plan and site allocation policies? Is any further work required to establish this?

The modelling undertaken so far appears to be based on the assumption that previous trends and preferences will continue and should be accommodated. We have argued that there is a huge body of evidence that shows that building more road capacity facilitates the growth of traffic and moves the congestion around since mitigation measures do not tackle the wider problem. We would also argue that an analysis of historic funding shows that it is insufficient to keep pace with traffic growth even if such an approach was considered desirable. The likelihood of an increase in funding seems improbable now that there is a growing awareness of climate change, although there is very little sign that this is being taken seriously.

Monitoring of sustainable transport

While monitoring is being considered separately as Matter 9, at which hearing we are not represented, we offer these brief comments as they are related to our comments on transport.

Re Question 9.6

Will the monitoring indicators and targets in Appendix 1 of the Plan provide a robust basis for assessing the Plan's delivery?

No, particularly in relation to assessing whether the Plan is actually delivering a reduction in car use and the mitigation of climate change. The lack of meaningful indicators and targets has allowed successive iterations of the Local Plan to ignore the consequences of what has been delivered.

Three indicators are proposed for CC5 Sustainable Transport.

1. Railway Station entry and exits. This is expected to monitor a modal shift towards increased rail use
2. Bus usage data. This is supposed to monitor a modal shift towards bus use
3. Amount of new development at Sustainable Urban Extensions and service centres with access to a half-hour frequency public transport service. The target is 100% of houses to be within 400m of a local bus service.

These indicators are not meaningful at all.

1. It is not possible to measure modal shift without considering all modes.

2. It does not state what data would be sought, the area covered or how it would be collected.
3. It is already evident that this has not been achieved in the approved SUEs. It does not state how 400m would be measured or what would be considered a local bus service - for example in terms of places served, the periods over which buses would run at a half-hourly frequency; either over the day or week.

INF 1 has one indicator and no target. It is assumed that the word 'amount ' relates to a monetary value and not a quantity. INF 2 has no indicator or target.

The quickest and most effective way to achieve modal shift will be through measures which create safe and attractive facilities for walking and cycling. Suggested indicators could be:-

- Does infrastructure spend show the priority is being given to deliver walking, cycling and the use of public transport before any improvements to the local and strategic road network.
- Is development really being put in places where cycling and walking are very realistic options?
- How much land has been lost for roads and car-parking?

Re Question 9.7

Does the Plan have sufficient flexibility to respond to changing circumstances and which policies/measures will ensure that?

No. It seems inevitable that substantial changes to planning policy will be required to mitigate climate change. NPPF as it currently stands contains a lot of rhetoric and presumptions. For reasons explained in our objections the Plan will not achieve sustainable transport. Once a site is committed it will be very difficult to change it or remove it. It will be there for decades.