

Leicestershire County Council
As the Local Highway Authority (LHA) for Leicestershire

Charnwood Local Plan Examination in Public

Hearing Statement
Relating to Matter 8, Issues 1 and 2

Word count: 2881 (excluding footnotes)

Introduction

1. This statement has been prepared in response to questions raised under Matter 8, Issue 1 (all questions) and Issue 2, (all questions bar 8.8) within the Examination Matters, Issues and Questions, issued by the Inspectors.
2. It provides supporting narrative to LHA comments made in responses to the Pre-Submission Local Plan (the Plan) in respect of:
 - the Infrastructure Delivery Schedule;
 - Policy INF1; and
 - Policy INF2;

and also sets out the LHA's views on evidence work to date and on the need for further work beyond the Plan's adoption. Flowing on from this, it provides the rationale for Main Modifications that it has worked with Charnwood Borough Council (CBC) to identify and agree relevant to this Matter.¹

Evidential approach

3. The Plan's evidence base has been developed in partnership between CBC, the LHA and National Highways (NH) ('the Parties') and in discussion with neighbouring local authorities including Leicester City Council (LCiC) as the Local Highway Authority for the City of Leicester.
4. It has been informed by available data and transport models and developed with the aim of identifying the impacts of Borough-wide growth and a package of mitigation which align with the Plan's policies.
5. The approach has been iterative, the objective being to increase the level of detail and refinement in parallel with and cognisant of the spatial strategy. It can be best summarised in terms of a sequence of broad steps, as outlined below.

Step 1: Arriving at a preferred development strategy and confirming that transport would be a key determinant in informing levels of housing growth (EB/TR/1 & 2)

¹ Whilst this Statement focuses on Matter 8 and the Main Modifications agreed in this regard, other consequential and linked Main Modifications, including to place-based policies in Chapter 3 and Policy CC5 in Chapter 7, have been agreed with CBC.

6. The LHA supported CBC in developing the initial transport evidence inputs to shaping the Plan, which occurred in 2018 and 2019.
7. The purpose of this step was to support the identification of an appropriate spatial strategy for development in the Borough.
8. Modelling assessments² were undertaken for a 2036 (proxy) horizon year across seven spatial development options defined by CBC which represented low and high levels of growth. Assessment was undertaken both with and without mitigation. Given the early stage in plan-making and the number of spatial options to be assessed, mitigation was simply represented based on generic uplifts in capacity applied at identified junctions and links as opposed to specific measures.
9. Spatial options were scored and ranked against core metrics which assessed the performance of the highway network including over-capacity queues and travel time.
10. The assessment highlighted a range of key challenges that would continue to represent important themes running throughout subsequent steps in the evidence building process. These include congestion and delays at main gateway junctions on radial routes leading into Loughborough; on the key A6 and A6004 routes which traverse Loughborough (and are part of the Major Road Network or MRN); on the A512 in Shepshed; and in areas to the north of Leicester such as Birstall, Syston, Anstey, Thurmaston and Rothley; in addition to key roads including the A46 and M1 (part of the Strategic Road Network or SRN).
11. This initial step informed CBC's sifting and selection of a preferred spatial option and highlighted that transport would be a key determinate in informing levels of housing growth across the Borough.

Step 2: Building a greater understanding of Borough-wide impacts from growth arising from a preferred spatial strategy (EB/TR/3-5 and EB/TR/11)

12. In 2020, CBC commissioned additional evidential work with the purpose of assessing the transport impacts of the preferred spatial strategy (referred to at this point as the Hybrid option, a blend of two options considered at Step 1).
13. The assessment approach³ identified broad locations and corridors around clusters of transport impacts (or hotspots) which were estimated to occur as a result of Plan development and where potentially mitigation would be needed. The broad locations are Loughborough urban area, Shepshed (including M1 Junction 23), Barrow upon Soar (in the Soar Valley), Syston and East Goscote, Birstall and Anstey (settlements around the north of Leicester). These areas broadly align with areas of interest identified at Step 1.

² An assessment using the highway-only component of the Leicester and Leicestershire Integrated Transport Model (LLITM) Standard (Unconstrained) version, which was the primary strategic transport modelling evidential tool available at the time. The assessment focused on a 2036 assessment year only (a proxy for the 2037 Plan horizon).

³ This step used Leicestershire's Pan Regional Transport Model (PRTM) version 2. The PRTM has been built using current industry best practice based on the Department for Transport's Transport Appraisal Guidance (TAG) and engagement/consultation with relevant stakeholders such as National Highways and Local Planning Authorities. The PRTM is an expansion of LLITM which had been used at step 1. The assessment focused on a 2036 assessment year only (a proxy for the 2037 Plan horizon).

14. There was no cross-boundary evidence available from other neighbouring Plans at the time, most notably for Leicester City. This was especially relevant around the north of Leicester area where modelling had identified issues on the transport network. This therefore created some uncertainties as to the level of impacts and mitigation required in this area.

Step 3: Developing an initial Borough-wide list of potential mitigation options (EB/TR/6-12 and 13)

15. The third step of evidence building comprised development of Borough-wide mitigation measures in response to the hotspot locations identified at Step 2.
16. In assessing potential mitigation measures, consideration was given to key travel movements along corridors within and between settlements across the Borough as well as existing infrastructure and services including cycle and bus routes. This process culminated in a long list of potential measures, incorporating a mix of measures set out in previous work (including but not limited to the Charnwood Sustainable Transport Study – EB/TR/14) and newly-identified measures.
17. In identifying mitigation measures consideration was given to alignment with policy, in particular mode hierarchy with active modes and passenger transport measures having greater priority over measures encouraging private vehicle travel; whether mitigation measures would be proportionate to the type/scale of impacts forecast; whether measures were considered feasible; and very indicatively how much they could cost (albeit by May 2021 the realities of construction price inflation were only just beginning to become properly understood).
18. This step provided a Plan perspective of what multi-modal transport measures could be required to mitigate the impacts of growth in 2037. It did not however consider the potential phasing and scalability of transport interventions prior to 2037 in line with the phasing of development to determine what mitigation would be needed during the early years of the Plan period.
19. The Parties therefore agreed that further enhancement of the transport evidence base was required to formulate a coherent mitigation strategy.

Step 4: Building a more detailed understanding of mitigation requirements, prioritisation and phasing to form an overarching Plan-level mitigation strategy (EXAM31)

20. The Hybrid option assessed previously at Steps 2 and 3 was further refined by CBC and was defined for both a Plan horizon year of 2037 and intermediate year of 2026. Building upon the work undertaken in Steps 2 and 3, PRTM was used to test the impacts and benefits of four transport scenarios. An assessment year of 2026 was developed to sit alongside the 2036 (proxy) assessment year.
21. The 2026 assessment has enabled the identification and assessment of mitigation measures needed to support growth coming forward during the early stages of the Plan period, therefore distinguishing them from measures which are either required at a later date or are of a scale and form which present greater deliverability challenges that would mean they cannot be implemented until a later stage in the Plan period.

22. **Scenario 1** focusses on *representative* sustainable transport solutions, largely as identified at Step 3; **Scenario 2** focusses on a combination of targeted Major Road Network (MRN) improvements and sustainable transport solutions (as per Scenario 1); **Scenario 3** focusses on a combination of targeted SRN improvements, plus targeted MRN improvements and sustainable transport solutions (as per Scenario 2); and **Scenario 3b** is the same as Scenario 3 but contains additional, larger-scale, Road Investment Strategy (RIS) pipeline schemes on the SRN (specifically the M1). All have been tested for 2026 and 2036 except for Scenarios 3 and 3b which have been tested for 2036 only because the larger scale interventions are unlikely to be delivered until after 2026.
23. The scenarios have enabled a sequential approach to assessing the cumulative effects with additional interventions layered on top of the previous scenario, therefore highlighting the level of mitigation achieved by each. The key findings are that:
- Sustainable measures alone would not be sufficient to mitigate the Plan's impacts – either over the lifetime of the plan (to 2037) or in the shorter-term (to 2026).
 - However, a combination of sustainable and targeted MRN interventions would be capable of sufficiently mitigating the Plan's shorter term impacts – to 2026 at least.
 - In the longer term, the above measures would need to be supplemented by targeted SRN interventions, to help address the Plan's full impacts (to 2037). However, even with all of these interventions in place, there would still be a residual impact on the network.
 - Additional delivery of the RIS pipeline schemes has the potential to mitigate most of the residual impacts, albeit their strategic scale means that there can be no reliance on them coming forward, due to uncertainties about their delivery (including likely timescales) and given that they are of a cost beyond which the Plan/developments could afford.

Key conclusions drawn from the transport evidence base

24. The steps described above provide a proportionate outline of the Plan-level mitigation strategy. This includes a robust steer as to the specific impacts (i.e. identified highway junctions, links and wider corridors comprising junctions and links) which are estimated to occur on the transport network and will require mitigation by the end of the Plan period and in the initial five years; the potential value and impacts of introducing sustainable transport measures which mainly target shorter distance trips within settlements; and the general scale/form of mitigation required. However, further work will be needed to explore and develop a mitigation package in detail, as expanded on below.
25. The transport evidential approach demonstrates that there is an acceptable transport mitigation package that should be deliverable over the lifetime of the Plan, albeit challenges are very likely to persist, which are not unique to Charnwood, in seeking to secure investment in the coordinated delivery of infrastructure relative to the delivery of growth. In all likelihood, the sustainable measures will come forward first, as these can be scaled in line with development coming forward (e.g. a walking and cycling corridor can be enhanced rather than necessarily seeking to deliver an entire network at once). The next MRN window is 2025 to 2030, so measures on the A6/A6004 could be delivered in that timeframe. Beyond 2030 is the most probable timeframe for the delivery of SRN improvements.

26. The Parties' approach is being informed by lessons learnt from other Plans, most recently Melton. Here, major highway infrastructure was identified alongside sustainable transport measures as part of an area-based transport strategy, with an intention to allow some development to come forward prior to full implementation of mitigation measures, on the condition that it does not prejudice the ability to deliver cumulative infrastructure at a later date.

Ongoing collaborative working and key next steps

27. The Parties agree that further joint work is required to enhance the transport evidence base to provide additional clarity around specific mitigation requirements.
28. The LHA has worked with CBC to agree Main Modifications (MMs) to the Plan so that they reflect the evolving evidential work done to date and what is required post Plan adoption.
29. The aim of the MMs is to ensure that the Plan's policies are as robust as possible for seeking to secure funding, both public and private, for the timely implementation of transport mitigation; and to organise and agree commitments across the Parties to onward joint-working, subsequent to the Plan's adoption, the main aim of which will be to 'smooth' the process of delivering transport mitigation in support of Plan-led development.
30. The MMs proposed, especially the new Policy INF2, reflect local experiences elsewhere in seeking to provide the most robust policy platform possible for securing contributions.
31. Through the MMs there is a firm commitment from the Parties to further enhance the transport evidence base and to refine the mitigation strategy through the development of three Transport Strategies, i.e. for: Loughborough and Shepshed; the North of Leicester; and the Soar Valley respectively.
32. These Strategies are being developed around geographic areas which reflect the findings of transport evidence work and the nature of the transport package identified to mitigate the Plan's impacts. A primary purpose will be to address cumulative and cross-boundary transport impacts of growth both within and external to the Borough. The cross-boundary dimension will be especially strong in respect of the North of Leicester Transport Strategy, given the sensitivities of the transport network in this area identified throughout the evidence building process and noting the growth proposed within this area through the City of Leicester's emerging Local Plan.
33. Reflecting the evidence, the Strategies will be built around: improvements to sustainable modes of travel (i.e. walking, cycling and passenger transport); targeted improvements to the MRN; and targeted improvements to the SRN. Targeted road improvements mean that they are demonstrated as being required in the context of a multi-modal mitigation strategy which emphasises the importance of sustainable travel and are for the purpose of mitigating residual highway impacts of Plan development.
34. In response to the Government's Gear Change strategy, work is currently underway by the LHA to develop LCWIPs for the Loughborough and Shepshed area and for the

North of Leicester area. These will provide additional evidence around the specific measures needed to support modal shift and sustainable development.

35. In addition, the LHA is in the process of investigatory work to examine issues, conceptual solutions and build a strategic narrative for investment in the A6/A6004 MRN corridor. National Highways is also undertaking study work on the A46, which has been identified as a key corridor by the Midlands Connect (the regions Sub-National Transport Body), and at M1 Junction 23.
36. In response to the Bus Back Better: National Bus Strategy for England, the LHA and LCiC have published Bus Service Improvement Plans (BSIPs). Whilst both authorities were unsuccessful this time in securing recent Government funding for bus improvements, the BSIPs remain important evidence base documents presenting the challenges for bus services and priorities for how the attractiveness (in terms of encouraging greater use and shift away from the private car) of passenger transport across Leicestershire and Leicester City can be improved.
37. The LHA's BSIP will continue to be an important reference-point and leverage tool for discussions with development promoters on agreeing site-specific mitigation and contributions to cumulative measures. LCiC is moving forward with an alternative approach to securing bus improvements which, from the perspective of the Plan, will be especially relevant to the North of Leicester area.
38. A coherent mitigation strategy is essential. The proposed additional work is carrying forward the narrative thread developed and refined throughout the transport evidence base steps described earlier, with a continued focus on identifying and prioritising important sustainable transport opportunities; an increasing focus on investigating the sub-areas of impact within the Borough; and grouping these together into logical, functional areas that also align with the key locations for growth in the Plan's development strategy. This will be important in establishing clearer, evidence-based links between mitigation measures and specific sites (e.g. as set out in place-based policies in Chapter 3 of the Plan).

Proportionality – a strategy-led framework for informing future development-specific decisions

39. The transport evidence developed provides a proportionate view of transport mitigation requirements to support the delivery of the Plan. It would not be feasible through a Borough-wide, plan-making lens, to develop specific mitigation measures for each individual site allocation. These should more properly and appropriately be identified through site specific transport assessments undertaken in the context of the new Policy INF2 set out in the MMs.
40. Various Government funding pots have come and gone over the years associated to enabling the delivery of growth (e.g. Growth Deals and the Growth and Housing Fund). The same is likely to hold true for the future; over the Plan's lifetime (2021 to 2037) Governments are still likely to be making monies available to support economic growth and to help to deliver on net-zero policy aspirations/requirements.
41. There will continue to be a requirement for development promoters to assess and determine their site-specific impacts and mitigation requirements. The onus will be on site promoters to demonstrate this through their transport assessments developed in

support of planning applications, whilst the Plan-led mitigation strategy will provide the overarching framework of prioritised and phased measures which mitigate the cumulative and cross-boundary impacts of Plan-level growth.

42. The County Council's proposal is to pool developer contributions from developments with this funding being used for priority projects only when the money has been received.
43. The best way to maximise opportunities to secure investment from other sources is to develop appropriate area Transport Strategies.
44. The approach taken is of sufficient detail that it has identified specific junctions and links where mitigation is likely to be required and has outlined what form mitigation should take. This work will underpin more detailed work, both led by site promoters and through the three identified transport strategies, to be undertaken post-adoption of the Plan.
45. Whilst it is plausible to suppose that funding will come forward over the lifetime of the Plan towards the delivery of the mitigation package, it is highly improbable that it will be possible to bring forward all necessary mitigation measures in parallel with growth in the Borough. It is recognised that this may lead to increased levels of congestion on the highway network before mitigation measures are in place.

END