

# Charnwood Local Plan Examination

## Matters and Issues Statement

---

Representor **CEG**  
ID **574**  
Prepared by **Lichfields**  
Date **1 June 2022**

### Matter 8 Infrastructure and Transport

---

#### 1.0 Issue 1 – The Infrastructure Delivery Plan

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

- 1.1 CEG has concerns regarding the effectiveness of the Infrastructure Delivery Schedule at Appendix 3, principally that some of the costs and requirements do not appear to be appropriately evidenced or justified.
- 1.2 Some of the estimated infrastructure costs associated with the NEoL SUE (Thorpebury) in the Infrastructure Delivery Schedule have been lifted directly from the S106 Agreement, with no allowance for indexation, while the source of others is unclear. As an example, a cost of £5.35M is assigned to a 2FE Primary School within the NEoL SUE in the schedule at Appendix 3 of the plan, but a build cost of £6.98M is indicated in the table at paragraph 4.9 of the Infrastructure Delivery Plan. These inconsistencies need to be checked and appropriately evidenced to ensure the Plan is justified and effective for the course of the Plan period.
- 1.3 Appendix 3 refers to 3 primary schools being delivered at Thorpebury. Having regard to the expected housing delivery rate and completions within the plan period at Thorpebury (see CEG Matter 6 Statement), CEG suggest that 2 primary schools would be a more appropriate target. 3 primary schools are also referred to in Appendix 1 (Monitoring Targets) which requires modification for the same reason.
- 1.4 There also appears to be an omission at Appendix 3 in that no costs are provided for Open Space and Recreation facilities for Thorpebury, which is a clear requirement given a landscape-led approach is a key part of the scheme.
- 1.5 Overall, given the importance of infrastructure costs in establishing plan viability, additional information and evidence is needed to support the figures in the Infrastructure Delivery Schedule at Local Plan Appendix 3.

**Q 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**

**b. Library and waste provision**

**c. The use of s106 legal agreements to fund highway improvements**

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

- 1.6 To be effective, Policy INF1 should refer directly to the Infrastructure Delivery Schedule at Appendix 3 of the Plan. As above, the Schedule in the Plan must be consistent with the Infrastructure Delivery Plan and fully evidenced.
- 1.7 CEG is concerned that Policy INF1 (along with INF2) does not currently do enough to ensure that planning applications are accompanied by evidence to demonstrate that committed development and the associated infrastructure capacity has been taken into account when assessing additional infrastructure requirements. A similar requirement is also needed to ensure the determination of applications has due regard to committed schemes, to ensure there is sufficient infrastructure and capacity to support the development on a cumulative basis without compromising the delivery of large scale strategic sites which will come forward over an extended period of time. . For example, small scale schemes close to SUEs with planning permission should not be allowed to take up short term capacity which may be available if this will increase the infrastructure and cost burden on future phases of the SUEs. A modification should be made to the Plan to refer to this.
- 1.8 Further site specific submissions on this issue are provided in CEG's Matter 6 statement.

## **2.0 Issue 2 – Transport**

- 2.1 CEG does not at this stage wish to comment in detail on these questions raised under this issue. CEG would however highlight, the detailed transport modelling work undertaken to assess the effects of the NEoL SUE at application stage; the measures secured by condition and obligation to manage potential effects and promote sustainable travel choices; and ongoing discussions with the Borough, City and County Council's to support the implementation of transport and highway measures associated with the NEoL SUE.
- 2.2 We reserve the right to comment further as the outcome of the Council's ongoing work emerges.

### **3.0 Issue 3 – Community Facilities**

#### **Q 8.10 - Overall, does the plan make appropriate provision for new and improved infrastructure including transport and are any main modifications necessary for soundness?**

- 3.1 Overall, CEG is concerned that the infrastructure delivery chapter in the draft Plan and the Infrastructure Delivery Schedule at Appendix 3 are not appropriately evidenced to ensure the Plan is effective in supporting the sustainable delivery of allocations and the SUEs as part of the overall spatial development strategy.
- 3.2 A review of Appendix 3 alongside the Infrastructure Delivery Plan is required to ensure the costs and requirements stated in the Plan are consistent and appropriately evidenced. In relation to Thorpebury, CEG has identified specific inconsistencies regarding the anticipated cost of the primary schools and modifications will be required to correct this. A modification is also needed to ensure the Plan specifically recognises that any figures sourced from S106 agreements will need to be index linked, to enable the effectiveness of the Plan into the longer term.
- 3.3 Appendices 1 and 3 will need main modifications in relation to Thorpebury to correct the number of primary schools to be delivered from 3 to 2, as well as ensuring requirements and costs are provided for Open Space and Recreation facilities.
- 3.4 A modification should also be made to this chapter of the plan to ensure the capacity needed to support development which is submitted with applications for planning permission has due regard to committed developments, such as the NEoL SUE, to ensure that approved capacity and phasing approaches are not compromised.