

Inspectors – Charnwood Local Plan 28th October 2023
c/o Mr Ian Kemp, Programme Officer
PO Box 241
Droitwich WR9 1DW
By e-mail: idkemp@icloud.com

Dear Sir,

Draft Charnwood Local Plan: Consultation regarding Draft Transport Strategy document, Updated viability and sustainability assessment.

The County Council published their position on 24th October 2023 in a [Supplementary Paper](#) for Cabinet. My comments are based on their response as well as the recently published Transport strategies and Viability Assessment.

My principal concerns are that the Plan is not currently viable and that the Transport plans do not adequately address the sustainability requirements. An unviable plan will incur significant costs to the public and even greater traffic congestion.

Updated Viability work

1. The Borough's Viability Report concludes that even *the maximum S106 contributions are right at the margins of viability*. The LCC Supplementary Paper then states (48 ii) that "*it is not recommended to set contributions right up to the margins of viability*", It goes on to explain why.
2. It would be a high-risk strategy to bank on government bids in the future. Leicestershire is not the only local authority whose finance is in a dire position. There will be other competitors for transport funding. The EM Gateway and the devolved authorities will be amongst them.

Transport Strategies

3. A clear approach to the development the Plan's transport was requested. This included the major road network as well as the Plan's objective to increase use of the sustainable modes of travel.
4. The majority of the mitigation refers to the use of "free left turns" at roundabouts or enhancements such as at the troubled Hobby Horse Roundabout. Whilst aiming to speed up the traffic it doesn't necessarily increase capacity where there are linear bottlenecks such as at Hathern and Shelthorpe. In several cases the improvements to traffic flow and speed are at the expense of cycling and pedestrians. (eg One Ash and Allendale Roundabouts).

5. The references to public transport give no indication of physical bus priority measures or other measures relating to Housing allocations in urban areas. The LCC Paper (47ii) confirms *the passenger transport cost estimate is based on costings for the current Rural Mobility Fund 'FoxConnect' pilot*. Rural bus services are a lifeline for many people and Demand Responsive Transport can be cost effective in rural areas. They are, however, ineffective in mitigating the urban peak demand which the Transport Strategies seeks to address.
6. The Passenger Transport Policy and Strategy, quoted in the Strategies (4.4) relies on commercial services, subsidies and provides no figures where modal shift may be achieved. The best we can expect are travel vouchers to new residents and subsidies for off peak rural services.
7. There are no demand side measures to encourage sustainable transport. Leicestershire County Council unfortunately opposed the Draft [Leicester Transport Plan](#) 2021-2036 because it was partly financed by Workplace Parking Levy even though it would offer greatly improved public transport from the south of the borough into the city of Leicester.
8. The Strategy tells (4.3.5) us the Loughborough/Shepshed CWIS is *at an advanced stage* but along with other Strategies has yet to be approved. The Loughborough area has always been regarded as excellent ground for developing cycling and walking. This is due to its topology and proximity to employment and town centre. Similar sentiments exist along the Soar Valley and Shepshed with proximity to local schools and local shops.
9. The common factor within the Sustainable Travel content of the Strategies is the absence of any reference to the location of Housing Allocations. There are no figures to demonstrate the anticipated take up or modal shift in mitigation of the transport demand from those housing allocations.
10. The *Sustainability Appraisal* reminds us that:
Accessibility, Air quality and Climate Change: "Option 3 is ranked as *the worst performing option* as it could generate a large amount of car trips close to Loughborough, which in addition to growth already planned could potentially put pressure on the AQMAs that are nearby. This also has implications in terms of carbon emissions and despite certain facilities likely being accessible on site, some basic services would not be within a reasonable walking distance."

Yours sincerely,

Max Hunt

County Councillor for Loughborough NW