
CHARNWOOD LOCAL PLAN EXAMINATION

Further Consultation September to November 2023

Response from CPRE Leicestershire

November 2023

Representation Number: 340

1. Introduction

1.1 In this response, CPRE Leicestershire sets out some comments and observations relating to the document, *Transport Strategies to Enable Growth in the Borough of Charnwood*, (Exam 75).

1.2 We note that this document was produced as a response to the request from the Inspectors to Charnwood Council (Exam 71) for more detail in order to conclude that the three Transport Strategies “will meet the Plan’s objective to increase the use of sustainable modes of travel” as well as securing effective mitigation for the effects of the Plan’s growth on the Local and Strategic Road Network.

1.3 We also note that in a letter, dated 23 August 2023, to Leicestershire County Council (Exam 74a) the Inspectors indicated that they considered the level of detail provided was proportionate in relation to the evidence required at this stage of the Examination.

1.4 In our view, the Transport Strategies currently do not provide the necessary assurance in relation to Promoting Sustainable Transport (NPPF 104 and 105) and Soundness of the Plan in general. In particular, we have concerns about the content, deliverability and funding aspects of what is proposed and we set these out in our comments and observations below.

2. Key Issues

2.1 For CPRE Leicestershire, there are four key issues that need to be addressed here. These are

- a) How far will sustainable public transport and active travel be promoted and delivered through these Transport Strategies?
- b) How far does a progression of road schemes mitigate the impact of traffic growth?
- c) At a time of great uncertainty with regard to both public and private funding, how and with what certainty will there be the necessary funding to deliver required measures?
- d) How are contributions from development to be determined or sought from developers?

2.2 All these questions are pertinent to the discussion of the Transport Strategies and what is proposed in Exam 75.

3. Three Proposed Transport Strategies

3.1 We understand that the primary purpose of the three Transport Strategies and associated packages, covering Loughborough and Shepshed, Soar Valley, North of Leicester, is to address and mitigate the cumulative and cross-boundary highways and transport impacts of growth within and without the Borough.

3.2 It is recognised that significant changes in travel behaviour would be required if the impacts of growth on transport are to be lessened significantly (EXAM 75, para. 2.4). But it is also claimed (3.4.2) that “evidence” shows that the enhancement of sustainable travel will not be sufficient to mitigate the impacts of growth. The very limited information provided shows it was based on testing some very poor suggestions.

3.3 The principal basis for mitigation measures is stated to be firstly to reduce car borne trips through maximising sustainable travel opportunities and secondly to focus remaining traffic on the most appropriate routes available (3.4.1). The package presented is said to be centred on three elements, two of which include first enhancing sustainable transport measures across the Borough including active travel such as cycling, walking and wheeling and public transport and, second, targeted improvements to the Major Road Network (MRN) (3.4.3).

4. Comments and Observations

4.1 Maximising Sustainable Transport

4.1.1 A major strand in this package of mitigation measures is the aim to maximise sustainable travel opportunities in order to reduce car borne trips. However, in CPRE Leicestershire’s view, the measures presented, even those which are welcome, are in reality, unlikely to have a significant impact in reducing level of car trips. In practice, they would fail

to meet the challenges faced in trying to maximise sustainable transport going forward and show little commitment to the principle.

4.1.2 One of these challenges is how to reduce use of cars for journeys to work. The 2021 Census shows that in the places where most development is proposed over 80% of journeys to work were car drivers, with around a further 5% being car passengers.

4.1.3 The CLP Interim Forecasting Report (EB-TR4) includes Highway Network Statistics for the County and Districts derived from the PRTMv2 traffic model. These show Vehicle Distance (veh-km) and Vehicle Delay–Time (veh-hours) for a 2014 Base and a 2037 Baseline.

4.1.4 Vehicle Delay is the additional time vehicles spend travelling and total Vehicle Distance increases partly due to the increase in journeys made and partly because of additional distance where traffic is diverted as the model tries to deal with congestion.

4.1.5 The data is provided in three tables 3.2, 3.2 and 3.3 for the AM Peak, Interpeak and PM Peak respectively. The table below shows the assumed percentage increase for Charnwood and Leicestershire for these three periods over the 2014 to 2037 period. It is against the 2037 Baseline that options for the CLP were tested.

	Vehicle Distance			Vehicle Delay		
	AM	Interpeak	PM	AM	Interpeak	PM
Area						
Leicestershire	28%	39%	28%	55%	61%	59%
Charnwood	29%	42%	29%	63%	63%	81%

4.1.6 This substantial increase in vehicle delay, particularly in the PM Peak (81% in Charnwood), reveals the scale of the problem in dealing with traffic growth in general over that period. The additional change from proposed development in the CLP appears to be relatively modest but it is just adding to the problems and unless there is a significant change in travel behaviour it will not cease in 2037.

4.1.7 It is evident from this that tinkering proposed at a handful of junctions, where the potential to increase capacity is highly constrained, will not mitigate the impact of traffic growth and may simply move it around. Anyway, it cannot be assumed that funding for all of the ten proposed junctions will be found, even if they continue to be regarded as essential.

4.1.8 An obvious approach to reduce car use, particularly in Loughborough, would be to transform conditions for cycling. The extent to which the proposed Transport Strategies could change behaviour and reduce traffic is not made clear but increasing the capacity of junctions would do the opposite.

4.1.9 Local Cycling and Walking Infrastructure Plans (LCWIPs) are seen to be a key mechanism to increase walking and cycling to meet government objectives. It is claimed that they are heavily driven by evidence and public engagement. This seems to be greatly overstated as the engagement so far has been very limited. While some work has been done to look at an LCWIP for the Loughborough area, it is noted that the North of Leicester area has not got beyond the initial stage and the Soar Valley area hasn't even got that far. (4.3.11)

4.1.10 Figs 2.1, 2.2, 3.1 and 3.2 merely show lines on a map giving an indication of draft walking and cycling networks respectively for the Loughborough / Shepshed and North of Leicester areas. The principles that would underpin the design of these networks and any associated measures, for example Low Traffic Neighbourhoods (LTNs) to make them attractive, is far from clear.

4.1.11 In the case of the Soar Valley area, Table 1 (4.3.11) shows the 'transport package' only contains proposals for routes to two stations. No evidence is presented to show why stations are regarded as so important. The station has fairly low use (around 2% of that at Leicester station) and routes to schools and the village centre would seem to be a higher priority.

4.1.12 Para 4.3.12 makes it clear that the evaluation process for schemes does not align with the requirements of developing an LCWIP or that needed to make them eligible for public funding. In other words, the cycling proposals may be welcome but are not sufficient.

4.1.13 Turning to maximising passenger transport, another challenge relates to the way sites for developments were selected. The consequences of the forecast growth and the need for more sustainable travel were not considered seriously during the site selection process.

4.1.14 A significant number of the CLP (Charnwood Local Plan) housing sites are in locations where there are few facilities and the prospect of an attractive bus service is remote. Most of the sites are too small for buses to penetrate even if several sites could be planned and delivered together, which was not proposed. Furthermore, the constraints to doing that are insurmountable within the current transport and planning framework.

4.1.15 In many cases it would not be practical to serve sites with attractive bus routes due to their location or design. The usefulness and viability of any demand responsive transport

has yet to be proved. It is clear that the difficulty of providing public transport to the proposed sites was not given any weight at the site selection stage.

4.1.16 Para 4.4.5 states that even greater uncertainties arise in relation to securing developer contributions towards site specific bus services and notes that their long term future is not guaranteed if developer funding ceases. This is a common problem which does not inspire confidence where existing bus access or very specific new proposals are not identified.

4.1.17 With regard to passenger transport, it is concluded (4.4.8) in a rather broad and general statement that ‘the continued evolution and delivery of the Leicestershire BSIP (Bus Service Improvement Plan) measures in collaboration with the Enhanced Partnership with bus operators will inform the passenger transport content of the three area transport Strategies’.

4.1.18 Given the continuing financial pressures on bus operators and cuts in services, there must be considerable doubt over whether meaningful contributions to maximising sustainable public transport can be achieved without significant changes in national and local policies and priorities. In particular, how much of it would specifically mitigate for the new housing proposed in the plan.

4.1.19 All this leads CPRE Leicestershire to conclude that the Transport Strategies have not yet been developed to a stage which shows that they will meet the Plan’s objective to increase the use of sustainable travel to any noticeable extent.

4.2 Major Road Network (MRN) and Junction Schemes

4.2.1 We note that the second strand to the proposed package involves “targeted improvements to the Major Road Network (MRN)”.

4.2.2 CPRE Leicestershire has serious concerns about how far prioritising these junction schemes would in itself compromise efforts to maximise sustainable transport. Proposals to increase traffic on the MRN, and give them priority for funding, in reality suggests a limited commitment by both the County and Borough Councils to changing travel habits.

4.2.3 While Para 3.4.2 refers to a *multi-modal* mitigation strategy, it actually involves “targeted improvement to the MRN” for the purpose of mitigating “residual highway impacts of Plan development”. This is said to be required “in order to ensure that as much traffic as possible is able to use the MRN” (3.4.3). It is very unclear how this is multi-modal. Moreover, the designation of a section of the A6, which in reality carries mainly local traffic, as part of the MRN seems at odds with many other considerations. The decision to increase

traffic along this route would be contrary to making alternative modes more attractive and is bizarre.

4.2.4 One of the key findings in Section 4 is that despite sustainable and targeted MRN interventions, there would still be a residual impact on the network (4.2.2). It is suggested these Transport Strategies are the best opportunity for co-ordinating and seeking to secure funding for mitigation measures but it is not entirely clear how they help.

4.2.5 In contrast to looking at measures to reduce car use, Para 4.5 shows that significant time and money has been spent on looking at least ten schemes intended to facilitate an increase in traffic. It is evident that the schemes and costs are far from finalised (4.5.3).

4.2.6 It is concerning that it considers there is a need to “build a strategic narrative” (4.5.5) to increase traffic, through an urban area like Loughborough, which has great potential for cycling which is not being fully utilised. In our view, this is not consistent with mitigating climate change or reducing the need to travel by car.

4.2.7 The statement that National Highways (NH) is progressing studies in relation to schemes 1, 7, 8 and 9 (4.5.6) seems inconsistent with other statements and documents from NH. Based on the latter statements, the chances those being delivered appears remote. Significant alterations (cost c. £14m) were completed at M1 Junction 23 in September 2021 and less than a year later they were considered inadequate. The most expensive scheme in Table 3 is £15.1 million for further improvements to this junction. The estimates are shown on page 31 of Exam 75.

4.2.8 Section 5 discusses cost, funding and delivery of the Transport Strategies with a suggestion that the total package could cost “at least £180m” (5.1.2). The estimate for highway “improvements” is based on May 2022 prices with no allowance for inflation. EXAM 31b appears to be a very rushed attempt to provide some assurance about the cost of the various transport schemes.

4.2.9 The extremely high total of £183m shown in Table 3 in Exam 75 includes £47m for ten road junctions. The relatively low proportion for the latter appears to give an impression that the capacity of roads is not as high a priority, although it clearly is. Moreover, it now seems likely from the October Leicestershire County Council Cabinet Report that priority for funding will to be directed towards the junction schemes.

4.2.10 The County Council’s budgets are said to be insufficient to fund the transport measures (5.2.2). However, the intention is to continue to seek public funding through various Government funding pots if they arise. As these have come and gone in the past

(5.2.3), this is clearly not a reliable or satisfactory process for ensuring that the impact of development can be mitigated.

4.2.11 What is clear is that if there is to be a serious change of direction in terms of sustainable transport, the balance of funding needs to radically change and what is currently on offer will largely facilitate traffic growth and increase congestion at remaining pinch points and particularly inside the urban centres.

4.3 Funding Issues and Developer Contributions

4.3.1 Pressures on the County Council to fund transport measures raises concerns over the extent to which any schemes or packages of measures can be or will be delivered.

4.3.2 The Council's intention is to continue to seek public funding through various Government funding pots as they arise but in para 5.2.4, various aspirations for seeking contributions from private developers are expressed together with a proposal that projects will only be progressed when funding has been received.

4.3.3 Because of difficulties in seeking contributions to fund transport proposals, especially prior to the adoption of the new Charnwood Local Plan, the County Council has established an Interim Transport Contributions Strategy which attempts, among other things, to deal with developer contributions. The expectation is that the Borough Council will ultimately provide the basis for seeking developer contributions.

4.3.4 In EXAM 74 Leicestershire County Council noted the delay to the adoption of the Charnwood Local Plan (CLP) and said it was critical to seek contributions as sites progress through the planning process. It also expressed concern that Charnwood BC had yet to identify a suitable mechanism to give effect to the Interim Transport Contributions Strategy.

4.3.5 CPRE Leicestershire is concerned that no suitable methodology for seeking contributions from the various sites appears to have ever existed and none appears to have been proposed. The current situation is that there is no clarity about the basis for these important contributions. We also consider that suggestions to pool money from various developments will prove unworkable as there can be no guarantee as to when and how they could be progressed.

4.3.6 Our concerns relate specifically to:

- a) how contributions to guaranteed long term bus services will be secured given the wide geographical spread and small size of many of the allocated sites, especially outside core urban areas.

- b) how various developments could be pooled or even master-planned as the various sites could come forward at different stages and what contributions are being securing from developments approved pending the adoption of the plan.
- c) how the claimed lack of 5 year land supply has led to the approval of a range of individual applications on unallocated sites prior to the adoption of the plan and to the associated lack of clarity regarding developer contributions.

4.3.7 In our view it is important that there is clarity over the different contributions required from developers, particularly as several planning applications for sites identified in the new Charnwood Local Plan and elsewhere have been put forward prior to the adoption of the plan. These seek to exploit the claimed lack of a 5 year land supply and the presumption in favour of sustainable development outlined in NPPF 11 d).

4.3.8 We note that 17 of the 18 sites not in the Local Plan which have been approved, or are being sought, are in locations described as “Service Centre” or “Other”, with over 800 dwellings in each. The latter are locations with very few facilities and no realistic prospect of any significant sustainable travel. It is inevitable that these allocations will slow down delivery in more sustainable locations. The other site for 50 dwellings was in Shepshed and was approved on appeal.

4.3.9 Having regard to NPPF 11d) it is evident to us that insufficient weight is being given to NPPF 104 and 105 which refer to promoting sustainable travel; having regard to the impacts of traffic; providing a genuine choice of transport modes; environmental gains and managing patterns of growth.

4.3.10 Current national and local guidance lacks many essential elements needed to change the balance between cars and other modes.

4.3.11 In this regard, we note with much concern a recent statement in a report to the October meeting of Leicestershire County Council Cabinet:

“50 ii) In reality, the lack of coordination between spatial planning and ‘public’ investment in infrastructure and services is a national issue; officers have taken and will continue to take appropriate opportunities, such as through Government consultations or Parliamentary calls for evidence, to raise this issue and call for action by Government to address the problem.”

4.3.12 This agrees with our view that there are several fundamental problems that need to be resolved before there can be any certainty of delivering a Local Plan that delivers sustainable travel and is in accordance with climate change commitments.

5. Conclusions

5.1 Taking all this into account, and in answer to the four questions set out above, CPRE Leicestershire's conclusions are:

1. The three Transport Strategies, even if fully developed on the basis proposed, would do very little to increase the use of sustainable modes of travel and have not yet been developed to a stage which shows that they will meet the Plan's objective to increase the use of sustainable travel to any noticeable extent.
2. Proposals, including junction schemes, to increase traffic on the MRN, and give them priority for funding, will at best have minor or minimal mitigation impact on the traffic network and will still leave adverse residual effects, in some cases simply moving congestion around.
3. There is no certainty regarding public or private funding for either road or active travel or passenger bus transport thereby raising doubts about the deliverability of proposals that will follow from the requirements of the Local Plan.
4. The basis for seeking developer contributions from sites has not been made clear and these seem a long way from being finalised. This clarity regarding how contributions will be determined or sought from developers is urgently needed.

5.2 Overall, we consider that the mitigation in respect to transport provision would not offset the negative transport impacts which the planned development would cause and we consider the Plan remains unsound. Therefore, we consider it is crucial that the issues raised here are addressed now so that a 'sound' new Local Plan can be adopted as a matter of urgency.

References

Leicestershire County Council Cabinet Reports 24th October 2023:

Website: <https://politics.leics.gov.uk/ieListDocuments.aspx?CId=135&MId=7079&Ver=4>

1. 285 "Final" Cabinet Report Part A & B
<https://politics.leics.gov.uk/documents/s179177/FINAL%20Cabinet%20Report%20October%202023%20-%20Charnwood%20Borough%20Councils%20Local%20Plan.pdf>
2. Cabinet 24 October 2023 (which is a supplementary report)
<https://politics.leics.gov.uk/documents/b19814/Cabinet%20%2024%20October%202023.%20Tuesday%20Oct-2023%2014.00%20Cabinet.pdf?T=9>