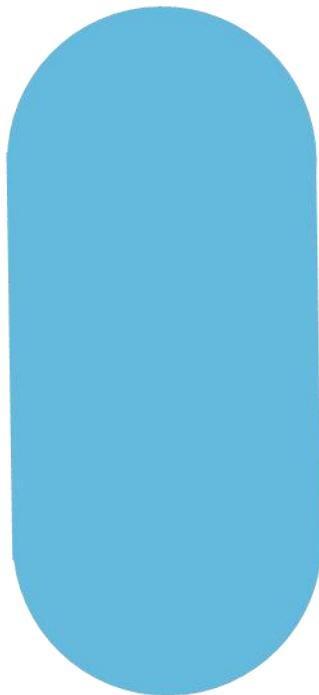


Representations

Charnwood Local Plan Review - Transport Strategy and the Updated Local Plan Viability Consolidated Addendum Report – consultation November 2023.

William Davis Limited

November 2023



1. The following representations are made in response to the Charnwood Local Plan, additional information on behalf of William Davis Limited. The documents are have been prepared and consulted upon following the hearing sessions held in February 2023 into the Charnwood Local Plan review. The Inspectors at the hearings sessions raised a number of issues that required clarity from the Council. The Council have sought to address the concern raised by the Inspector by the publication of a number of documents. The representations relate to the following documents;
 - Draft Transport Strategy document (EXAM 75) and
 - Updated viability work (EXAM 76)
2. The Inspectors, in a letter dated 23rd May 2023, advised that the three Transport Strategies discussed as part of Matter 8, were not detailed or developed in order for a conclusion to be reached on their effectiveness to meet the Plan's objective to increase the use of sustainable modes of transport in addition to securing effective mitigation for the effects of growth.
3. The other area the Inspectors sought updates on related to the viability work which needed to take into account the increased build costs related to education provision and also to take into account the costs associated with the delivery and implementation of the three Transport Strategies.
4. William Davis Limited (WDL) raise no issues with and are supportive of the overall spatial strategy set out in the submitted Local Plan. WDL, note that the Inspectors have confirmed that the level of detail of the three Transport Strategies is proportionate for the examination and the required consultation. Furthermore, WDL notes that the Inspectors have referenced the mechanism for developer contributions, is a matter for the authorities to resolve in due course, and it is the Council's intention to address this issue with the adoption of the Plan. However, concern is raised over the fundamental relationship between the requirements to deliver the three Transport Strategies, the proposed costs for education and the outcomes of the updated viability report.
5. The key strategy the County Council are advocating within the transport strategies consists of three main elements;

- Enhancing sustainable transport measures across the Borough, including cycling, walking and wheeling (active travel) and passenger transport.
 - Targeted improvements to the Major Road Network
 - Targeted improvements to the Strategic Road Network
6. WDL have no issue with the three main elements set out above, however, WDL are concerned that the sustainable transport measures are seeking to address existing deficiencies within the network and have not separated out what needs to be provided/developed in order to mitigate the impacts of new development proposed within the new Local Plan. As set out in paragraph 3.1.4 of the report the Strategies are not intended to deal with more localised impacts of a particular development site. There will continue to be a requirement for developers to assess and determine their site-specific impacts and mitigation requirements. The onus will be on developers to demonstrate this through their transport assessments developed in support of planning applications, whilst the Plan-led mitigation strategy will provide the overarching framework. It appears that the costs will be expected to be borne by the development industry, which as the updated viability report demonstrates causes issues with the amount of S106 that can be realistically can be achieved.
7. It would have been useful if the Council had set out what infrastructure needs to be delivered to ensure the first five years of deliverable sites could be achieved. This would provide certainty and would allow a better understanding of what mitigation could come forward at a later date, namely, what is required for sites scheduled to deliver 5-10 years and then a route map of sites to come forward post 10 years.
8. The concern is that with the mechanism for securing developer contributions, to be dealt with at a later point in the process, understood to be at the adoption of the Plan, there is insufficient information to understand what costs developers will be expected to pay, particularly as it is stated in the transport strategies that part of the sustainable transport measures for which national funding is available is governed by the development of Local Cycling and Walking Infrastructure Plan (LCWIPs).

9. In developing the LCWIPs, the County Council has only been able to base costs on preliminary conceptual design work and Active Travel England cost bench marking base data. As the schemes progress greater certainty over costs will be known. At this moment in time, however, the costs of the sustainable transport measures have been estimated at £136,000,000 which includes £10,000,000 for passenger transport measures.
10. The highway improvements set out in the Local Plan's evidence base, details ten schemes required to be delivered to enable the growth of Charnwood. These ten schemes have estimated cost values of £47,000,000. It must be stressed, however, that this is based on May 2022 prices with no allowance made for inflation. Furthermore, some of these schemes are still in development so their conceptual designs may change in the future which will impact on the estimated costs. These figures therefore must be treated with caution.
11. The overall cost of the transport mitigation package the County Council have developed is estimated at £183,000,000.
12. In order to pay for the proposed mitigation, the County Council highlight two key sources of funding, namely, private and public. The County Council acknowledge that they will have to bid for monies from central government relating to the delivery of the LCWIPs, major and strategic road network mitigation improvements. In relation to securing private sector funding the County Council advise that they will work with the Borough Council to secure financial contributions from developers which can be pooled.
13. The County Council has also advised that for education contributions they would seek to secure per dwelling;
 - £14,633 Leicester Fringe
 - £14,675 for Loughborough/Shepshed and
 - £15,813 for the wider Charnwood area.

The education provision being sought includes the costs of providing six new primary schools, extensions/alternations to existing secondary schools and post 16 costs.

It is unclear as to what the cost figures for primary schools are based upon. It would be useful to see the evidence the County Council has relied upon to determine the figures being sought. The costs for the secondary school and post 16 provision is based upon the costs of recent school built at John Fernley School in Melton Mowbrary. Given that the secondary school provision will be extensions/alterations to existing schools, the use of new build costs does not seem to be appropriate. A review of recent planning permissions granted highlights that S106 contributions for educational purposes (which include a mix of primary, secondary, and early year's provision) range between circa £3,221 to £10,500 per unit. This, at the lower end of the scale is considerably less than what is now being proposed to be sought from developers and in all cases lower than the costs set out above.

Chapter 2 – The updated viability consolidated addendum report August 2023.

14. Section 9 of the report, “Conclusion and recommendations”, states that taking into account the proposed changes to the S106 contributions approach (to the maximum headroom) that the Plan is viable. The report recognises that further work is required to monitor and manage the infrastructure requirements particularly items from the County Council.
15. As set out above greater clarity is required on the key elements of infrastructure required to deliver the first five years of housing within the Plan and to understand what developers will be expected to contribute in terms of S106 sums per unit. At this stage it is difficult to comment without knowing the costs of infrastructure required to be delivered as a direct result of new development and those costs that are needed to be met to address existing deficiencies within the network, which should not be borne by the development sector.
16. How the education contributions proposed have been calculated would also be useful in order to understand the methodology and enable a thorough and informed judgement to be made.