

## Charnwood Local Plan Examination Further Consultation

### Exam document 75 – Lack of cumulative assessment of transport infrastructure

1. We strongly object to the approach proposed in paragraph 3.1.4 of Exam 75 and set out below our reasons for doing so.
2. The cumulative impacts of the cluster of four allocations at HA15, 16,17, and 19, resulting in over 1,360 homes surrounding the existing Grange Park estate **will be ignored if paragraph 3.1.4 of Exam 75 is not amended to put the onus back on to the County Council to carry out the transport assessment.**
3. As the County Highway Authority it must be the responsible body for carrying out this independent transport assessment of the cumulative impacts and be satisfied that these allocations can indeed be safely accessed, properly serviced by public transport, off site cycleways and importantly carry out the essential off-site highway works necessary as a result of the cumulative impact resulting from these developments.
4. No single developer will be able or willing to pick up the cumulative infrastructure requirements stemming from a holistic transport infrastructure assessment which is required to prevent the Grange Park estate from becoming a dysfunctional area. For instance, sections of Haddon Way currently have considerable car parking along a blind bend, to mitigate this, will possibly require a car parking layby to be created and the road to be realigned, no single developer will be able or willing to undertake such works. This must be part of the Transport Strategies, with costings and infrastructure funding to support the delivery of this.
5. Sections of Laburnum Way, Highlands Drive and Laurel Road need to be fully assessed as they too suffer from similar issues. There is no existing bus service to most of the Grange Park. So without undertaking a cumulative impact assessment of the proposed development, there cannot be a proper feasible Transport Plan in place; one that considers innovative solutions to provide bus transport in much the same way as the County's Transport Strategies currently proposes for some rural areas. Without this the four allocations proposed cannot be considered as sustainable locations.
6. The County Council must be the independent Authority responsible for developing a transport plan for the cluster of developments proposed around Grange Park and set out how identified mitigations can be funded and delivered. This is the only way that we consider the Inspectors can be satisfied that the Charnwood Local Plan has been Positively Prepared and judge whether it can indeed be deemed as Sound.

### Exam document 76 – Special policy requirements need to be reflected in the viability assessments

7. We do not consider that the current greenfield viability appraisal scenarios are appropriate for the assessment of HA16 and HA17 and set out below why this is the case.
8. There is need to reflect the special Charnwood Forest policy requirements as set out in policy for SD/2 DS3 HA16 and HA17 in the Viability Appraisals Exam 76 and for the Inspectors to be satisfied that these are indeed deliverable once account is taken of these and also of the additional off site transport infrastructure requirements mentioned above that are currently not considered.

9. The following extract from the Pre-Submission Draft Local Plan Examination Document SD/2 policy DS3 (HA16) states:

*'The site is located in a sensitive and valued landscape within the Charnwood Forest and forms an important part of the landscape setting of Loughborough. The site is prominent in views from the Outwoods and other higher ground to the west, and **care will be needed in planning the site to ensure that urbanising effects of development are successfully mitigated.** The **provision of significant planted areas which allow trees with large canopies to mature is likely to be a more successful solution to integrating new development into the landscape.** This will require careful attention not just to design and layout, **but to long term management and maintenance of public open spaces.** The site is also in a **strategically important link in the wildlife network** between the important natural resources of the Charnwood Forest and Soar Valley. For this reason, it is particularly important that biodiversity net gain is achieved **on site in this location** rather than through off site contributions, in accordance with Policy EV6. Parts of the site are **at risk from surface water flooding** and access to the western portion of the site needs to be carefully planned in light of a flood risk assessment. The site also includes a **tributary of the Wood Brook.**'*

10. To meet these policy requirements to mitigate against the urbanising impacts of development, create strategic wildlife corridors and incorporate large canopy trees within wide public open spaces with long term management of public spaces will require some variations to the viability appraisal input assumptions to reflect this type of development scenario.
11. We consider that this is likely to require at least 40% of the land to be set aside for green infrastructure planting (excluding land take for highways and service infrastructure), the density assumptions too will need to be reduced to possibly 25 to 30 dwellings per hectare. This is likely to change the total number of dwellings that can be effectively developed on the allocated sites after allowing for the sensitive Charnwood Forest character.
12. There will also be a need to demonstrate and provide costed management plans for the green infrastructure with an explanation of how the revenue costs for this will be funded, and this too should be factored into the viability appraisals to demonstrate these allocations are indeed deliverable and able to afford the policy requirements set out above in addition to meeting the policy requirements for affordable and lifetime homes.
13. These viability appraisals will also need to factor in the additional off site transport costs highlighted above to mitigate the impact on Grange Park estate and also to create a sustainable development.
14. The Inspectors must be satisfied that these policy requirements are indeed reflected in the viability appraisals currently undertaken in Exam Document 76 to demonstrate that the Local Plan is indeed deliverable.

Dated 8<sup>th</sup> November 2023