



**Charnwood Local
Plan 2021-2037**
Publication Stage
Representation Form

Ref:

(For
official
use only)

Please return to Charnwood Borough Council by 5PM on 23rd August 2021
by:

- Email: localplans@charnwood.gov.uk
- Post: Local Plans, Charnwood Borough Council Southfield Road,
Loughborough, LE11 2TX

The Privacy Statement can be found at: www.charnwood.gov.uk/privacy

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each
representation you wish to make.

Part A

1. Personal
Details*

2. Agent's Details (if
applicable)

** If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)
boxes below but complete the full contact details of the agent in 2.*

Title	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text" value="Chair"/>	<input type="text"/>
Organisation (where relevant)	<input type="text" value="CPRE Leicestershire"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address	<input type="text" value="mailto:info@cpreleicestershire.org.uk"/>	<input type="text"/>

CPRE Leicestershire Responses to Charnwood Local Plan – Pre Submission Consultation

Contained in this document are CPRE Leicestershire responses and reports that relate to:

1. Paragraphs 2.5 and 1.1 Strategic Growth Plan/A46 Corridor
2. DS1 (Response 1 – Climate Change)
3. DS1 (Response 2 – Housing)
4. DS2
5. DS3
6. DS4
7. DS5 (Response 1 – Density)
8. Proposal for Density Policy
9. DS5 (Response 2 – Design)
10. Appendix 4 and DS5
11. H1
12. H2
13. EV6
14. EV7
15. CC5
16. INF1
17. INF2
18. Report: CHARNWOOD PLAN Review of Housing Evidence for CPRE Leicestershire (related to DS1 and DS3)
19. Report: Charnwood Local Plan -Report on Sustainable Travel and Transport in the context of mitigating climate change for CPRE Leicestershire (related to DS1, CC5, INF1 and INF2)

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Leicestershire

3. To which part of the Local Plan does this representation relate?

Paragraph	Paras 2.5 and 1.1 Strategic Growth Plan/A46 Corridor	Policy		Policies Map	
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4. Do you consider the Local Plan is (please tick as appropriate):

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

CPRE Leicestershire considers the blanket support for the Strategic Growth Plan (Para 2.5) is not sound. The SGP was agreed prior to the development of local plans, such as the Leicester Plan.

The reference to the Strategic Growth Plan as 'new' in the Introduction is potentially misleading (Para 1.1) and should be removed. It was adopted in 2018 before a number of changes to Housing Policy, including the Government's 16 Dec 2020 Planning Statement which sought additional housing to be found within urban areas such as Leicester and signalled the abolition of Duty to Cooperate.

CPRE Leicestershire also argues that there are likely to be greater opportunities to provide additional housing within the urban area and such a strategy would better deliver sustainable development. Our response, for example, to the Option stage of the Leicester Plan argued there was evidence for further housing in the Urban Area but at that stage the level was hard to gauge because the evidence was incomplete.

Furthermore, the impact of potentially accelerated changes to retail, leisure and

office needs post-COVID should also be taken into account.

Moreover, the approach set out in the paragraph is clearly at odds with the aspiration set out in the preceding paragraph (Para 2.4), specifically: *'Our development strategy aims to direct development to locations that provide access to jobs, services, infrastructure and where there are alternatives to the private car.'* The SGP approach would lock in longer distance car journeys by directing significant levels of development to areas poorly served by cars and increasing car use through large scale road development.

CPRE also considers reference to the A46 Priority Growth Corridor to be unsound especially as it has been put in doubt by waning support for the A46 Expressway. In CPRE's view this suggested priority growth corridor will harm the landscape and rural character of sensitive part of the High Leicestershire Landscape Character Area outside of Charnwood and is not in line with the Plan's aspirations to protect and enhance the natural and built environment.

CPRE Leicestershire understands that the SGP has a role to play but the Charnwood Plan should instead seek a review of the SGP which aims to support sustainable development, in particular Climate Change mitigation, and which directs more development, particularly housing, to brownfield sites in line with the Paragraph above and the text of DS1.

As a result, we consider that this part of the plan is not sound. It is not prepared based on proportionate evidence nor is it consistent with national policy on climate change, sustainable development and brownfield prioritisation.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The Plan should recognise that the SGP was produced some years ago and is now in need of revision as a result changes since its adoption. It should not be supported but its existence should be recognised.

CPRE Leicestershire is not against there being a Strategic Plan for Planning in Leicester and Leicestershire, but the SGP is at best only a partial and one-sided strategic plan.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Not on
this
matter

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

A.W.Stott,
Chair, CPRE Leicestershire

Date:

19
August
2021

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Leicestershire

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	DS1 (Response 1 - Climate Change)	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is (please tick as appropriate):

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

CPRE Leicestershire, with some reservations, supports the general introductory wording of Policy DS1. We note, however, in the list of criteria for supporting sustainable development there is no specific mention of addressing climate change and this requires alteration to make the policy sound in terms of effective delivery and consistency with National Policy, most notably Para 152 of the NPPF.

In particular, there is no goal to reduce climate change. The plan currently lacks any clear target to reduce carbon emissions in line with the Government’s National Policy of reaching Net Zero by 2050 or in line with Charnwood Council’s own goal to achieve carbon neutrality.

Even though one of the Plan’s stated objectives (Environment 2 on page 16), and perhaps its most important, is to ‘reduce net greenhouse gas emissions, in support of achieving a carbon neutral Borough, and reduce and adapt to the impacts of climate change’, it is unclear to what extent the plan will contribute to that. Indeed, many of the proposed developments on the face of it are likely to increase emissions, certainly from transport.

As importantly the Plan fails the NPPF requirement in Para 152 that ‘planning should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions.’

In particular the location of significant amounts of new development in unsustainable locations, the lack of transport initiatives to realistically mitigate the resulting growth in car travel and the failure to provide evidence to demonstrate that the plan will lead to a reduction, let alone a radical reduction in climate emissions makes it fundamentally unsound in relation to National Policy and is an inappropriate strategy given the Climate Emergency.

CPRE is not in a technical position to offer a target for reduction in emissions for the plan or and perhaps alternatively, a date for carbon neutrality. However, such a target is required to make the plan sound.

In support of this DS1 should also include text that requires developments to directly contribute to a reduction of emissions through the way they are designed and delivered so they are at least net zero, and better still, carbon zero in the longer term.

Achieving such developments should be a key element of the overall development strategy so an additional criterion should be added to the list of bullet points in DS1 to the effect that there will be support for sustainable development that:

This would provide a stronger and more positive emphasis on the way in which individual developments include elements that contribute to reducing emissions and more efficient use of energy.

The suggested wording on a climate target would have implications for other policies, particularly CC5, INF1 and INF2 (along with Appendix 3) and this objection should be read in conjunction with our objections to those. The requirement on specific developments should also directly link to policies DS5, CC3 and CC4 in the text in DS1.

Please refer to our report [Charnwood Local Plan: Report on Sustainable Travel and Transport in the context of mitigating climate change re: this response and those for CC5, INF1 and INF2](#)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We will only support sustainable development if it:

- *is carbon costed and can demonstrate that it will contribute to directly by way of its design, delivery and access to a reduction in greenhouse gas emissions and to the achievement of carbon neutral Borough in line with a target to reduce emissions across Charnwood by XX.*

- *minimises the need to travel, in particular reducing the reliance on the private car, while prioritising public transport, walking and cycling...*

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

 Yes, a representative of CPRE Leics

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We feel a representative of CPRE should, if appropriate, be invited to participate in hearing sessions. Various elements of the overall strategy are central to CPRE Leicestershire's concerns about the soundness of some key elements of the plan

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Signature:

A. W. Stott,
Chair, CPRE Leicestershire

Date:

19
August
2021

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Leicestershire

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is (please tick as appropriate):

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
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Leicestershire CPRE notes the reference to efficient use of land in list of criteria for supporting sustainable development in Policy DS1. However we also note that there is no policy in the Plan which seeks minimum average densities for sites which it is linked to.

We believe this makes the plan unsound because it is not positively prepared in that it is not consistent with achieving sustainable development and because the policy is not effectively delivered. While Density could be included as part of Policy DS5 and H1, we think that would give insufficient weight to the issue and are proposing a new strategic policy on density. Please see separate representation: Proposal for Density Policy.

This is needed not only for existing sites but for sites which might come forward as windfalls.

A minimum density of at least 30 dwellings per hectare (dph) and 40 dph on sites within and adjacent to the Principal Urban Area and in selected Centres would in our view be modest and also consistent with the aims of sustainable development. This would be consistent with the 2017 Leicester and Leicestershire Joint Methodology for SHELAAs.¹

¹ [SHELAA Joint Methodology Paper - 2019.pdf \(nwleics.gov.uk\)](#)

We do not agree that the overall housing need in the New Home section of the policy is sound. The Council should urgently examine whether a departure using the 2016ONS figures can be justified. They should also reduce the contingency for houses with planning permission to 5%. The report we append to this objection and our objection to Policy DS5 suggests this could reduce the overall number to 16,055.

This would ensure the plan was positively prepared and also that it was justified against reasonable alternatives and based on proportionate evidence.

Please refer to our report: Charnwood Plan – Review of Housing Evidence for CPRE Leicestershire by Gerald Kells re this response.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to cooperate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested Density Policy Wording (Similar to Hinckley and Bosworth²)

The Density of development will be guided by good design principles and the prevailing character of the area rather than specific density targets. However, unless justified through principles of good design, to ensure the efficient use of land the following minimum densities apply to residential development:

- *At least 40 dwellings per hectare within and adjoining...*
- *At least 30 dwellings per hectare within and adjoining... and in Rural Villages and Rural Hamlets*

All developers will be expected to demonstrate that they have sought to use land efficiently.

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² Hinckley and Bosworth, Consultation Draft Plan June 2021 https://www.hinckley-bosworth.gov.uk/downloads/file/7356/draft_local_plan_2020_-_2039

No, I do not wish to participate in hearing session(s)

Yes – a representative of CPRE Leics

Yes, I wish to participate in hearing session(s)

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A. W. Stott,
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Leicestershire CPRE considers this Policy as set out is not sound because it is not justified and based on proportionate evidence. Firstly, the Government has signalled that it will be withdrawing the Duty to Cooperate.

How need that cannot be met in Urban Areas, in this case Leicester, will be met is unclear, but since the unmet need in Leicester is predicted to largely occur after 2031 and since there is good reason to anticipate greater supply in Leicester than currently projected it would seem premature to address this immediately in ways which might lead to unsustainable levels of housing in Charnwood, which would have impacts on the countryside as well as undermining the goal of reducing carbon emissions in the borough which is a key goal of the plan as we set out in our objection to Policy DS1 of the Plan.

Our response to the Leicester Plan Options consultation argued that the amount of housing land available was likely to be underestimated. Since then, the arbitrary addition of 35% to the ONS2014 need figures, which themselves may be exaggerated, has led to an increase potentially in housing need in Leicester but this has not yet been tested through the Plan Process, nor how it should be met.

Moreover, the impact of potentially accelerated changes to retail, leisure and office needs post-COVID needs to be taken into account and will be particularly felt in Leicester.

For all these reasons Policy DS2 should only commit Charnwood to reviewing its housing requirement in the light of updated evidence and policy guidance when it is reasonable to do so and put the emphasis on ensuring a sustainable, brownfield-led approach.

The review is not urgent.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

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Not on
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9. Signature:

A. W. Stott,
Chair, CPRE Leicestershire

Date:

19
August
2021

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Leicestershire

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is (please tick as appropriate):

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Leicestershire CPRE consider this policy unsound. As set out above the shortfall may only be 5,516 based on the 2016ONS figures. We believe that lower figure is justified based on proportionate evidence and so should be adopted (see appended report).

Moreover, CPRE Leicestershire argues that all the houses with planning permission on the North East of Leicester Urban Extension should be included in the plan, reducing the need to 4,157.

A further contribution will inevitably also be found from windfall sites and the Council should publish its data on both small and large windfall sites to inform this. The 2021 Leicestershire Statement of Common Ground would suggest this should amount to 1,120 dwellings over the plan period reducing the need to 3,037, without any consideration of larger windfalls.

This would fulfil the requirement in Para 71 of NPPF for ‘compelling evidence’ to justify a windfall allowance.

Moreover, the Council should urgently review the yield of sites based on an increase in densities in line with the density policy CPRE is suggesting.

This would also be consistent with the approach suggested in the 16 Dec 2020 Government Statement.

This would significantly reduce the need for Green Field sites to be allocated. Not only would this protect the countryside and reduce traffic growth, it would be consistent with

the aim to reduce Carbon Emission in the Borough, in line with our objection to DS1.

Overall Leicestershire CPRE considers a shortfall of 3,037 (compared to 8,858 in the plan) is supported by proportionate evidence and takes account of reasonable evidence.

This would reduce the need for sites to be identified within the table by 5,821.

The table is, therefore, unsound and should be updated taking account of the sustainability and environmental impacts of individual sites, particularly green field sites.

Please refer to our report: Charnwood Plan – Review of Housing Evidence for CPRE Leicestershire by Gerald Kells re this response.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Modification of the table in DS3 and proposals in policies LUA2 and policies DS3 (HA1) through to DS (HA69) to take account of the contribution of windfalls and changes to density requirements in line with the density policy CPRE is proposing.

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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No, I do not wish to participate in hearing session(s)

Yes – a representative of CPRE Leics

Yes, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We feel a representative of CPRE should, if appropriate, be invited to participate in hearing sessions. Various elements of the overall strategy are central to CPRE Leicestershire's concerns about the soundness of some key elements of the plan

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9. Signature:

A. W. Stott,
Chair, CPRE Leicestershire

Date:

19
August
2021

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Leicestershire

3. To which part of the Local Plan does this representation relate?

Paragraph	2.15 – 2.21 5.13, 5.17	Policy	DS4	Policies Map	
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4. Do you consider the Local Plan is (please tick as appropriate):

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/> No
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In a summary of the Charnwood Local Plan 2021-37 which appears on the Council’s website, the Council says the Plan “sets out how the Council will balance the need for growth with environmental safeguards while providing communities with the infrastructure needed to prosper” and in this context, it makes specific reference to providing: “Flexible employment space for the 8,900 jobs needed in the borough through to 2037”. However, in the Plan document there is no mention or reference to this figure or to the provision of a specific number of jobs underlying the employment site allocations. We are at a loss and confused at this discrepancy.

It is unclear to us what is the basis for additional employment site allocations beyond the already existing allocations for West of Loughborough, North of Leicester, North of Birstall sites mentioned in Table 3: Strategic Employment Need and Supply 2021-2037 on page 22. Clarification of the supporting evidence is required. The discussion of employment requirements is too spread out in different parts of the document, including paragraphs 2.15 to 2.21 and 5.6 to 5.20 and Policy DS4.

We have concerns over the data that appears to have been used:

1. The figure of 8,900 appears to come from the Charnwood Borough Council Employment Land Review, which was issued in March 2018. This is calculated:

Total forecast jobs 2011-2037	18,500
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Less: already added up to 2015	9,600
Hence remaining to be added	8,900

The 18,500 comes from the Housing and Economic Development Needs Assessment (HEDNA) issued in January 2017. It is based on 'planned growth' labour demand forecasts which the Land Review itself conceded were unacceptable for use in forecast requirements. In addition these figures are at least 4-5 years out of date and unreliable for use in planning.

2. The requirement of 8,900 new office jobs has been translated into an actual land area of 15ha of office space in the draft Plan. The basis for calculating the office employment need of 11.92 ha in table 3 is not shown in the Plan. Indeed in paragraph 5.13 and 5.17 we are presented with general statements such as "our evidence forecasts a growth in office related jobs to 2037" and "Our evidence regarding employment land highlights that our existing supply commitments are sufficient to provide choice and flexibility to meet our needs". There is no indication of what level of growth is forecast and therefore whether existing supply commitments do actually meet or exceed needs. These are not identified with quantitative data and so it is not clear whether or not whether the translation of the jobs required into land allocations is based on a flawed calculation or not.
3. The forecast requirement for new offices must take into account the changes that Covid-19 has brought about in flexible working. Since it uses information from 2017 and 2018 as its base, this is not the case. Other than general statements (paragraph 5.13), little account is taken of the possible changes following the pandemic. It also goes without saying that the Covid-19 pandemic that has hit the country in the last two years has also enormously affected the entire situation regarding both jobs and available land – so many shops have closed in town and city centres that the space available for office development is much higher than envisaged in the HEDNA.

In conclusion, the policy is unsound. The basis on which the requirement for land has been calculated is unclear and confusing. Generalised statements about evidence are not helpful.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Clarification of the basis for calculating the employment need and how the translation of the number of jobs into land allocations was arrived at is required.

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Not on
this
matter

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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9. Signature:

A. W. Stott,
Chair, CPRE Leicestershire

Date:

19
August
2021

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Leicestershire

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is (please tick as appropriate):

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This policy is unsound because it does not include a minimum density requirement. DS1 sets out the need for 'efficient use of land', but this cannot be achieved without a density policy. While that could be incorporated into DS5 we believe it would have greater weight and ensure that aspect of the plan was deliverable if a specific policy were included.

However, in that case, given the close relationship of density and design to make Policy DS1 sound it would require a cross-reference to that policy.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggested Density Policy Wording (Similar to Hinckley and Bosworth)

The Density of development will be guided by good design principles and the prevailing character of the area rather than specific density targets. However, unless justified through principles of good design, to ensure the efficient use of land the following minimum densities apply to residential development:

- *At least 40 dwellings per hectare within and adjoining...*
- *At least 30 dwellings per hectare within and adjoining... and in Rural Villages and Rural Hamlets*

All developers will be expected to demonstrate that they have sought to use land efficiently.

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

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Yes – a representative of CPRE Leics

Yes, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

We feel a representative of CPRE should, if appropriate, be invited to participate in hearing sessions. Various elements of the overall strategy are central to CPRE Leicestershire's concerns about the soundness of some key elements of the plan

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

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August
2021

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Paragraph	<input type="text"/>	Policy	Proposal for Density Policy	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is (please tick as appropriate):

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	Re: soundness
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

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CPRE believes the plan is unsound because the aim of using land efficiently in Policy DS1 is not supported by a housing density policy, as is the case, for example, in Hinckley and Bosworth. Such a Policy, linked to DS1, DS5, H1 and other relevant policies, is required to make the plan sound.

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All developers will be expected to demonstrate that they have sought to use land efficiently.

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Yes – a representative of CPRE Leics **Yes**, I wish to participate in hearing session(s)

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Regarding Soundness:

Reference to local design codes requires clarification. It is unclear how these will relate to existing codes established within Neighbourhood Plans, Village Design Statements, BfHI or National Codes or how the new codes will be set up and monitored. We question whether a 'tick box' approach can be applied to managing the aesthetics of design. We consider that a senior design professional should be appointed to evaluate aesthetics and provide direction.

The broader aspirations of DS5 are commendable but the management tools are vague including the process for independent design reviews. There is no reference to the effect of the pandemic on design strategy mindful that more people are working from home and many offices are closing thereby releasing potential sites for brownfield residential development.

The emphasis is on 'appearance' and beautiful building but flood risks, transport infrastructure, biodiversity and climate change issues are understated in this section albeit mentioned elsewhere.

However, while climate change impacts are mentioned in DS5, biodiversity impact is not. If developments are to be of high quality and to achieve biodiversity gain as required by Policy EV6, then they need to be designed with nature in mind and how design benefits nature as well as people. A reference to biodiversity and nature is

absent from the list of design requirements for developments set out in DS5 and should be added to the list.

Policy EV6 indicates that development proposals should be accompanied by an ecological survey...and demonstrate how they have been designed to minimise ecological impact and provide 10% net gain on site... This requires a positive approach to benefiting nature where possible as well as people. For example, elements of the approach set out by the Wildlife Trusts in their publication, *Homes for people and wildlife*, could be seen as beneficial in this regard and included in local design guides. (https://www.wildlifetrusts.org/sites/default/files/2018-05/homes_for_people_and_wildlife_lr_-_spreads.pdf)

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See above regarding 'Soundness'. Design Codes require interpretation and monitoring by a senior design professional within the planning department

Include reference to enhancing biodiversity (in line with EV6) in the list of design requirements in DS5

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Not on
this
matter

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The Appendix is well intentioned but relies too much on words. Some of the illustrations are unclear, confuse rather than enlighten and are open to interpretation. The guidance concentrates on housing alterations, extensions and related issues and may well conflict with the proposed codes. It would be much improved by photographs of exemplars with a related commentary and it is important that the public contribution through NPs & VDSs is not bypassed.

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An expert design professional should be appointed as a senior member of the planning team to evaluate and direct design strategy for significant planning applications.

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Policy H1 does not give an accurate reflection of the Housing Mix identified in paragraph 4.5 Table 6, therefore cannot be used by a decision maker to determine if a planning application meets with the aims and is in accordance with the Local Plan Policy. It is only subject to interpretation.

NPPF para 62. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers.

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Policy H1: Housing Mix - Amend

We will ~~seek~~ **REQUIRE** a mix of house types, tenures and sizes that meet the overall needs of the Borough in line with our most up to date evidence as Table 6. Preferred Mix of New Housing by Size and Tenure

Table 6: Preferred Overall Mix of New Housing by Size and Tenure Preferred

Overall Mix of New Housing by Size and Tenure Table				
	1 bedroom	2 bedroom	3 bedroom	4+ bedroom
Market	Up to 10%	20-30%	45-55%	15-25%
Affordable home ownership	10-20%.	35-45%	30-40%	5-15%
Affordable Housing (rented)	60-75%		20-30%	Up to 10%

We will do this whilst having regard to the extent to which those needs have already been met by other development, local housing needs and housing market evidence, economic conditions, viability and site specific circumstances

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

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No, I do not wish to participate in hearing session(s)

Yes – a representative of CPRE Leics

Yes, I wish to participate in hearing session(s)

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Paragraph Policy Policies Map

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The Policy is weak in its interpretation of the supporting text. Stating that ‘We will also support the provision of bungalows, instead of promote, or actively support the provision of bungalows, etc.

There is a need to strengthen the Policy so not rely on Developers controlling the provision of bungalow and other accommodation in order that proper provision is made for the groups covered by the Policy, giving positivity to the Policy

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Amend the final part of Policy H2 Housing for Older People and People with Disabilities to read:

We will also:

- ~~support~~ **PROMOTE** the provision of bungalows or other single level properties; and
- ~~support~~ **PROMOTE** the provision of specialist accommodation where it addresses

the needs of older people in accordance with identified housing needs and care requirements, or of younger people with special accommodation needs.

We are asking for the word 'support' to be replaced by 'promote' and a more positive action oriented policy approach.

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For CPRE Leicestershire a strategy for the protection, enhancement and recovery of nature and biodiversity and ecological networks must be a key policy priority.

While we support the specific requirements set out in Policy EV6, it is, in our view, incomplete and needs to set out a less reactive and a more proactive and strategic approach.

As currently written the emphasis appears to be on a series of requirements that in the main relate to individual locations or sites rather than to wider ecological and wildlife networks. The accompanying text, especially paras. 8.39 to 8.42 present a picture of the pressures on nature, through the loss of habitats and species and on ecological networks arising from increasing development. It acknowledges that this is resulting in significant features becoming isolated from each other in the wider landscape. In other words, a key aspect of the problem is the way in which wildlife corridors or networks have been undermined or lost in the past.

There is some recognition of the need for habitat connectivity and strategically important links in the wildlife network in the text and diagrams related the allocations in DS3 and in Chapter 3 Place Based Policies. The picture presented is a series of individual locational responses rather than a coherent comprehensive Spatial Strategy for nature and biodiversity recovery across the borough.

Quite rightly para 8.42 talks about Charnwood Forest/National Forest, Rivers Soar and Wreake as being of high value for wildlife. This is addressed to some degree in Policies EV4 and EV5. But the idea of a comprehensive approach covering the rest of the Borough is undermined in what is almost a throw-away line at the end of 8.42, where it is written: “Whilst these areas will be the focus for nature recovery, other parts of the Borough will also be targeted including the Wolds”. But not further elaboration is provided.

If the objective is to “conserve, restore and enhance our natural environment for its own value...and ensure it is resilient to current and future pressures” then this Policy needs to go beyond what happens on particular designated locations or individual sites for development and take more account of the wider network. As constructed Policy EV6 is a reactive rather than a proactive one as it is not linked underlying to a Spatial Strategy for nature and biodiversity.

Paragraph 179 of the July 2021 version of the NPPF, (repeating the wording of the previous version) states that:

“To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.

Although there are diagrams and maps relating to individual sites for development, there is no map in the Plan that identifies and maps the wildlife habitats, ecological networks, designated sites and wildlife corridors in and across Charnwood as a whole. Without this data, it is difficult to judge whether the Plan will fulfil the requirements of sub-paragraph b) of 179 and in particular to judge whether 10% biodiversity gain overall is being achieved.

The ecological surveys called for by this policy should consider the impact of the proposed development on the wider ecological network of which the site is a part and how it adversely impacts on the biodiversity beyond the site despite any gains that may be achieved on the development site itself.

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The policy and the accompanying text should:

- Include in the Plan document a comprehensive borough wide map of wildlife

- habitats, ecological networks, designated sites and wildlife corridors;
- Provide in the accompanying text an explanation of what the bullet point in EV6 that reads “protects and enhances biodiversity networks, including strategically important links in the wildlife network between our most valuable habitats...” involves:
- Show how Policy EV6 will promote Environmental Objective 3 (page 16): “To protect and enhance the range of habitats and species found in Charnwood, seek to deliver biodiversity gain, reverse habitat fragmentation and encourage the recovery of ecological networks.

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CPRE Leicestershire supports tree planting as one way of combatting climate change and enhancing our natural environment. However the Plan and this particular policy and its accompanying text neglect the importance of hedgerows. This gap in policy needs to be remedied so that EV7 is about tree planting and the protection and enhancement of hedgerows.

Besides being important features in the countryside and the wider landscape, they can make an important contribution to carbon sequestration as well as providing habitats and natural corridors for wildlife, thus enhancing our natural environment and contributing to nature recovery networks.

Investing in protecting and enhancing the hedgerow network should be an important element of increasing the biodiversity gain from development

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Our suggestions for modifications to this policy:

Policy EV7: Tree Planting **and Hedgerows**

We will seek to protect and enhance our natural environment by increasing the number of trees **and by an extension of the hedgerow network** in Charnwood. We will support development that:

- retains existing trees **and hedgerows** where appropriate;
-
-
- provide important extensions to the hedgerow network and in particular contribute to biodiversity gain.

We would want to see the accompanying text discuss and acknowledge the importance of an extended hedgerow network for climate change and biodiversity as well as features in the landscape.

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Yes, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

A. W. Stott,
Chair, CPRE Leicestershire

Date:

19
August
2021

Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Leicestershire

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is (please tick as appropriate):

4.(1) Legally compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input type="checkbox" value="No"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

CPRE supports the aim of this policy and the general goal set out in the first sentence to minimise travel. However, much of the housing and economic development included in the plan would fail that test and would increase car traffic. Our objections on housing figures (DS1 and DS3) would lead to more realistic development levels. This would in turn allow the council to remove sites which fail the text of that opening sentence.

However, the NPPF requirement in terms of radical reductions in climate change emissions (Para 152) and promoting sustainable transport would still apply whatever the level of development.

As written the rest of the policy is too permissive to deliver the goals of reducing climate change emissions. In effect, all it requires developers to do is to provide access by public transport, walking and cycling to key services and to put in place a Transport Plan which very weakly 'considers' sustainable transport options. This allows developments which are highly car dependent to go ahead provided they include some other provision. In previous cases this has amounted to bus services subsidised for a short time which then prove unviable and cease.

In line with our objection to DS1 in relation to climate change CC5 needs to put more onus on developers to demonstrate that their proposals will lead to a reduction in car dependency and assist in a reduction in carbon emissions. Without that underpinning the

policy is unsound in relation to National Policy and is an inappropriate strategy given the Climate Emergency.

The importance of this has been demonstrated in recent planning decisions such as the recent Appeal Decision in South Yorkshire: Planning Inspectorate APP/J4423/W/20/3262600: Former Loxley Works, S6 6SX.

We also object to the lack of a requirement to, reducing the reliance on the private car, which is needed to deliver sustainable development, as well as the weak commitment to bus services which need to be viable in the long term to avoid tokenism. We have provided text to address those issues as well as the wider climate issue.

This objection also has implications for INF1 and INF2 and should be read in the context of our objection to that policy and to Appendix 3.

Please refer to our report Charnwood Local Plan: Report on Sustainable Travel and Transport in the context of mitigating climate change re: this response and those for DS1 (response 1), INF1 and INF2

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We will support sustainable patterns of development which will minimise the need to travel and seek to support a shift from travel by private car to walking, cycling and public transport.

We will only support major development which can demonstrate it:

- is carbon costed and can demonstrate that its transport needs will contribute to a reduction in carbon emissions in line with a target to reduce emissions across Charnwood by XX in line with policy DS1*
- is accompanied by a robust transport assessment and travel plan which prioritises sustainable travel options at the outset so that they form an integral part of the development,*
- minimises the need to travel, in particular reducing the reliance on the private car, while providing excellent accessibility to key facilities and services by walking, cycling and public transport, including for people with restricted mobility;*
- provides well-lit, safe and attractive walking and cycling routes and secure cycle shelters;*
- secures new and enhanced bus services, with evidence that they will be viable in the long term, including new bus stops, where development, is more than a 400m walk from an existing bus stop;*
- ensures sustainable transport infrastructure is well designed, integrated with the Green*

Infrastructure and contributes towards making high quality places;

- contributes to the infrastructure required to improve the speed, reliability and attractiveness of public transport including, where appropriate, bus gates, bus priority measures and bus links; and*
- reduces, as far as possible, the negative impacts on air quality in accordance with policy EV11.*

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

 Yes – a representative of CPRE Leics

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

For CPRE, the effectiveness of this policy and its implementation is a crucial concern as can be seen from our attached report on Sustainable Travel and transport.

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Signature:

A.W.Stott,
Chair, CPRE Leicestershire

Date:

19
August
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Part B – Please use a separate sheet for each representation

Name or Organisation: CPRE Leicestershire

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is (please tick as appropriate):

4.(1) Legally compliant

Yes

No

4.(2) Sound

Yes

No

4 (3) Complies with the
Duty to co-operate

Yes

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This objection should be read in the context of our objection to DS1 and CC5 in terms of climate change goals. As with those two policies and INF2 (along with the accompanying table of transport investment priorities) this policy would fail to deliver the kind of change required if Charnwood is to meet its own and the Government's goals to radically reduce carbon emissions (NPPF Para 152) and so is unsound in relation to National Policy and is an inappropriate strategy given the Climate Emergency.

Please refer to our report Charnwood Local Plan: Report on Sustainable Travel and Transport in the context of mitigating climate change re: this response and those for DS1 (response 1), CC5 and INF2

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy INF1:

Infrastructure and Developer Contributions

We will work with infrastructure providers, developers and partner organisations to ensure the delivery of new and improved infrastructure necessary to deliver our climate change objectives, support our development strategy and maintain sustainable and healthy communities. We will support development that:

- is supported by robust evidence of the infrastructure needed to mitigate impacts and support sustainable development, while meeting our climate change goals as set out in Policy DS1...*

Please note *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

 Yes – a representative of CPRE Leics

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

This is linked to our concerns over DS1 and CC5.

Please note *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

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A.W.Stott,
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5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

This objection should be read in the context of our objection to DS1, CC5 and INF1 in terms of climate change goals. As with those two policies INFF2 (along with the accompanying table of transport investment priorities) fails to deliver the kind of change in modal behaviour which is required if Charnwood is to meet its own and the Government’s goals to radically reduce carbon emissions (NPPF Para 152) and so is unsound in relation to National Policy and is an inappropriate strategy given the Climate Emergency.

The second bullet point, in particular, requires the provision of infrastructure which supports sustainable choices prior to improvements to the local and strategic network. However, that does not ensure that those will be comparable or that this will lead to any significant modal shift.

Everything can be done that is required by INF2 and development still go ahead in locations heavily dependent on access by the car. Those developments could still then lead to a disproportionate amount of spending on road infrastructure to support them.

The attached files show that 96% of the proposed actual spending relates to road infrastructure spending and only 4% to buses and active travel. While it is acknowledged that some of the road infrastructure changes will benefit vulnerable users, the balance of spending suggests the plan is heavily biased in reality to traffic dependent development.

It should be noted that if our objections in relation to the level of development (DS1 and DS3) were accepted that would reduce the need for housing in unsustainable locations and

allow for the plan to become more sustainable, alleviating the justification for additional road capacity.

Please refer to our report Charnwood Local Plan: Report on Sustainable Travel and Transport in the context of mitigating climate change re: this response and those for DS1 (response 1), CC5 and INF1

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy INF2:

Local and Strategic Road Network

We will work with Leicestershire County Council, Leicester City Council, Highways England and wider HMA authorities to mitigate the transport impacts of our development strategy and improve the efficiency of our local and strategic road network.

We will only support development that:

- is supported by a robust transport assessment of the impact of the development on the road network and on climate emissions, which includes any cumulative impacts;
 - can provide the necessary infrastructure to mitigate the impacts of the development with infrastructure prioritising and delivering sustainable transport choices (including walking, cycling and the use of public transport);
 - can show that any improvements to the local and strategic road network are consistent with the aims of DS1 to minimise travel and reduce carbon emissions;
- and
- contributes to the costs of measures required to mitigate the cumulative impacts of the development strategy upon the local and strategic road network, in accordance with Policy INF1.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

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Yes – a representative of CPRE Leics

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

This is linked to our concerns over DS1, CC5 and Inf 1

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. Signature:

A.W. Stott,
Chair, CPRE Leicestershire

Date:

19
August
2021



Charity Number: 1164985

CHARNWOOD PLAN

Review of Housing Evidence for CPRE Leicestershire

Gerald Kells

August 2021

1. Introduction

I was asked by CPRE Leicestershire to consider the justification for the housing numbers presented in the Charnwood Local Plan consultation to inform their objection.

To do this I consider firstly the overall need in the Local Plan.¹

I then consider the approach to supply and whether I consider all avenues of supply have been allowed for and the assumptions made in relation to supply. I examined the most recent Strategic Housing and Economic Land Availability Assessment (SHELAA 2021), which is, according to the Plan, the basis for the allocations².

I have not examined specific sites (particularly in regards to capacity) although this is something where CPRE Leicestershire may wish to examine the Council's approach in more detail.

CPRE Leicestershire has previously expressed specific concerns about any overspill requirement from Leicester, especially given the Government Planning Announcement on 16 Dec 2020 which increased the housing requirement in Leicester by 35%³.

CPRE Leicestershire have also previously raised concerns about the assumptions that underpin the assumed housing overspill from Leicester. I note that the Government Planning Announcement seeks for that overspill to be provided within the city on brownfield sites and also that the Government proposes to abolish the Duty to Cooperate under which Charnwood might have needed to accommodate growth from Leicester.

¹ Appendix A - Pre-Submission Charnwood Local Plan (2021-2037) and Policies Map (modern.gov.co.uk)

² Strategic Housing and Employment Land Availability Assessment, 2020 - Charnwood Borough Council

³ Government response to the local housing need proposals in "Changes to the current planning system" - GOV.UK (www.gov.uk)

However, while the plan allows for an early review to consider Leicester’s overspill the plan allocations are not predicated on any additional housing beyond need with Charnwood so in this paper, I have not addressed the overspill issue in detail.

I was also asked to specifically consider the implications for the Policies in the Plan. I address those in the final section. I have not considered individual sites nor commented on the detail of the spatial balance of development. Those are matters CPRE will need to take a local view on.

2. Requirement

The table below sets out the housing need for Charnwood during the Plan Period using the Standard Methodology based on the 2021-2031 base period and the latest 2020 Affordability Figures. I have added a 10% contingency in line with the plan approach and created a final excess in line with the Plan.

Charnwood Housing Need (2021-2037)	Annual Demographic Need	Standard Methodology Output	Plan Period (16 Years)	10% contingency	Excess based on 10,603
SM ONS 2018	920	1131	18,096	19,906	9303
SM ONS 2016	769	946	15,136	16,650	6047
SM ONS 2014	904	1111	17,776	19,554	8951

The two more recent ONS projections rely on lower (and perhaps more realistic) national housing based on differences in assumptions on things such as mortality and migration, but also significantly an assumption that household size will not decline as rapidly as previously expected.

In the most recent ONS household projections. However, the 2018 projections reverse the reduction in Charnwood as a result of changes to the way the distribution of housing is calculated across local authorities by ONS based on NHS registration data.

The Government (some say perversely) requires Local Authorities to continue to use the outdated 2014 assumptions in local plan preparation, not because of specific evidence to support that but to meet their national policy-driven housing targets.

This is partly on the assumption that post-recession, housing formation will increase if new housing completions increase, even though fiscal and economic constraint may stop that being the case.

A further issue with the projections has been highlighted in University Cities, such as Coventry, and recently examined by the Office for Statistics Regulation, where NHS registration of students may be skewing the demographic need upwards. This is clearly an issue which could impact on Loughborough, as well as Leicester itself.⁴

And it should be noted that, while the National Planning Policy Guidance discourages the use of a methodology which results in a lower housing requirement, there are appeal decisions (e.g., Appeal Ref: APP/Y2620/W/20/3248468 Land off Beresford Road,

⁴ Review of population estimates and projections produced by the Office for National Statistics. OSR publishes its review of population estimates and projections produced by the Office for National Statistics - Office for Statistics Regulation (statisticsauthority.gov.uk) May 2021

Holt) where a Council has successfully argued that the 2014ONS figures are not appropriate and the 2016 figures are more realistic based on other demographic data.

Moreover, the use of outdated figures was criticised recently by the Office for Statistics Regulation who said: *'We recognise that ultimately ONS cannot control the decisions of policy makers but ONS should be vocal in speaking up against those who choose not to use the most up to date and comprehensive figures, where there is not a reasonable argument for them to do so.'*⁵

Lastly, according to the Local Plan the housing requirement includes a 10% contingency on all sites. However, it would seem that the likelihood of failure to implement is lower on sites with planning permission. The SHELAA does not include any data on unimplemented planning permissions to justify this position although some sites are moved to a later date for implementation (Para 7.14).

The Black Country, as one example, is assuming a failure rate of 5% for commitments⁶. Using the 2014 ONS figures this would create an overall requirement of 19,023⁷. The table below applies that approach to all the ONS projections.

Charnwood Housing Need (2021-2037)	Annual Demographic Need	Standard Methodology Output	Plan Period (16 Years)	Contingency (10% and 5% on Commitments)	Excess based on 10,603
SM ONS 2018	920	1131	18,096	19,375	8772
SM ONS 2016	769	946	15,136	16,119	5516
SM ONS 2014	904	1111	17,776	19,023	8420

3. Supply

In terms of supply in Charnwood, the plan includes a list of existing commitments of 10,603. This, however, includes the site at Thurmaston, North East of Leicester which has permission for 4,500 homes, 1,295 more than the Plan allows for. This is because these homes, it is said, will not be delivered ahead of 2039. Given the shortfall it would seem that progressing these homes at a faster pace could be desirable before releasing additional Green Field land.

Charnwood Housing Need (2021-2037)	Annual Demographic Need	Standard Methodology Output	Plan Period (16 Years)	Contingency (10% and 5% on Commitments)	Excess based on 11,898 (Using all of North East Leicester Site)
SM ONS 2018	920	1131	18,096	19,311	7413
SM ONS 2016	769	946	15,136	16,055	4157
SM ONS 2014	904	1111	17,776	18,959	7061

⁵ See Footnote 4

⁶ Black Country Urban Capacity Study (May 2021) Para 2.1.14 Housing (dudley.gov.uk)

⁷ $(10,603 \times 1.05) + (7,173 \times 1.1) - 11,133 + 7,890 = 19,023$

A further issue arises when comparing the SHELAA capacities with the capacities given in the local plan. In Appendix 1 I have sought to adapt the plan table in policy DS3 make such a comparison, although it should be noted that the tables are not always easily comparable so it is entirely possible that I have not captured all the capacity in the SHELAA. In a couple of cases I have simply not been able to verify the exact SHELAA comparison.

What is clear is that the two capacities are not necessarily comparable and while in some cases, the SHELAA estimate is lower (Italicised in the table), in most case it is higher. As far as I was able to tell the overall SHELAA total includes some 1,710 more homes.

The SHELAA may have been a cruder assessment of capacity, (in some cases based on a simple calculation of net capacity at 30 dwellings per hectare) and there may be issues with individual sites which are not captured in detail in the SHELAA. However, there is no supplementary material which sets out the technical reasons for the change in capacities.

In terms of how capacity was assessed in the SHELAA, it followed, we are told, the joint methodology set out in the 2017 Leicester and Leicestershire Joint Methodology for SHELAA⁸. The gross net developable area is based on a table (below Para 7.34 of the SHELAA) agreed with developers. Those levels suggest less than 65% of a site will be developed for all sites over 2 hectares and less than 50% over 35 hectares. These figures are necessarily crude and it may be higher net developable areas will be achieved on some sites, for example, where there is already local service provision.

Furthermore, the Joint Methodology assumes a density of 30 dph but 40 dph on 'sites within and adjacent to the Principal Urban Area and in selected Centres'. The Charnwood SHELAA ignores this, despite the large number of sites on the edge of centres, including Loughborough itself. I can see no clear justification for this position. Whether it is also assumed in the calculations in the plan itself is also unclear.

Unlike some other Plans, such as the current consultation plan by Hinckley and Bosworth, the Charnwood Plan does not include a Policy with a minimum density requirement despite reference to 'efficient use of land' in Policy DS1. This could be incorporated at part of the Design Policy DS1 but it would be preferable to have a specific policy.

The last issue I identified in terms of supply is the issue of Windfalls. The Plan takes no account of windfalls, something other plan have included, such as the consultation pna by Hinckley and Bosworth. The SHELAA does not include any tables of either permissions or completions of windfalls.

One indication of potential for small site windfalls is the table of sites excluded from the SHELAA calculation and it includes 27 sites noted as below the SHELAA threshold. There are also some sites withdrawn by the owners or with other permissions. While this does not mean those sites will come forwards it does suggest windfalls may be an element of future supply.

⁸ SHELAA Joint Methodology Paper - 2019.pdf (nwleics.gov.uk)

Moreover, the Leicester/Leicestershire Statement of Common Ground 2021⁹ assumes 640 small windfalls (I assume under 10 dwellings although it is not defined in the tables) by 2031 or 1040 by 2036, In other words, 80 dpa. However, the Plan goes to 2037 so a figure of 1120 dpa would be correct by this calculation. It is hard to tell without seeing the historic annual figures but this may be an underestimate depending whether it is based on 5 or 10 years of data because the recession post 2010 tended to dampen windfalls in those years.

Even assuming this figure would have a significant impact on supply, and it would only account for traditional small sites. The Government anticipates in its 16 Dec 2020 Planning Statement that post-COVID changes to retail and office will lead to changes in the property market which will create new additional larger sites which would also be windfalls.

4. Conclusions

In terms of requirement, the Council has followed the Standard Methodology to justify its housing need. However, it could have considered whether there is evidence to support use of the lower ONS2016 figures. It could also have considered whether the student population could be skewing estimates of housing need.

I also cannot see a justification for the assumption of a 10% non-delivery rate for sites with planning permission and a 5% rate may well be more appropriate. This would lower the ONS 2014 excess to 8840 and ONS2016 to 5526. If all of the North East Leicester site was included this would reduce to 7061 and 4157 respectively.

In terms of supply my calculation is that the council has reduced the supply by some 1,710 from the capacities in the SHELAA. The justification for this may be site specific but no evidence is provided as to how this reassessment came about. It is also unclear whether the net developable areas have been examined to see if there are sites where greater capacity exists.

The density approach set out in the Joint Methodology does not appear to have been followed and it appears that Charnwood is assuming relatively low densities (30dph) will be achieved. There is no policy in the plan which sets out minimum densities as is common, and there does not appear to have been a specific text applied which examined whether such a policy could deliver additional housing in a way which was acceptable.

Lastly, there is no allowance for windfalls although the Leicester/Leicestershire Statement of Common Ground is consistent with a small site allowance of 1120 dpa. Nor is any evidence provided to justify the lack of a windfall allowance. No table is provided of the permissions/completions of windfalls in Charnwood.

This suggests to me there may be areas where Charnwood could increase supply but it is hard to examine those in any further details.

However, there is a prima-facie case, in my view, that the level of housing required beyond the current permissions is too high and the sites needed to meet that need is too low.

⁹ The Statement of Common Ground.pdf (leics.gov.uk), Appendix A and Appendix b.

Appendix 1: DS3 table including SHELAA site assessment figures (where I could identify them)

Policy Ref	Site Name	Location	Number of Homes	SHELAA	Site Specific Policy
Sustainable Urban Extensions					
LUA2	North East of Leicester	Thurmaston	4,500	3,205	Page XX
LUA3	North of Birstall	Birstall	1,950	1,950	Page XX
LUC2	West of Loughborough	Loughborough	3,200	3,200	Page XX
Leicester Urban Area					
HA1	Land South East of Syston	Syston	960	966	Page XX
HA2	Barkby Road	Syston	270	120	Page XX
HA3	Land north of Barkby Road	Syston	195	153	Page XX
HA4	Queniborough Lodge	Syston	132	132	Page XX
HA5	Land at Melton Road	Syston	31	34	
HA6	Brook Street	Syston	15	32	
HA7	Land off Barkby Thorpe Lane	Thurmaston	105	118	Page XX
HA8	Woodgate Nurseries, Barkby Lane	Thurmaston	39	29	Page XX
HA9	Works opposite 46 Brook Street	Thurmaston B	7	7	
HA10	Works adjacent 46 Brook Street	Thurmaston B	5	5	
HA11	Rear of Manor Medical Centre, Melton Road	Thurmaston	20	8	
HA12	Land at Gynsill Lane and Anstey Lane	Glenfield	260	380	Page XX
HA13	Park View Nursery Site off Gynsill Lane	Glenfield	30	30	Page XX
HA14	Land off Cliffe Road/Henson Close	Birstall	35	143	Page XX
Total: 2,104				2,157	
Loughborough Urban Centre					
HA15	Land south of Loughborough	Loughborough	723	683	Page XX
HA16	Laburnum Way	Loughborough	422	764	Page XX
HA17	Moat Farm, Land south west of Loughborough	Loughborough	205	386	Page XX
HA18	Land to r/o Snells Nook Lane	Loughborough	120	140	Page XX
HA19	Park Grange Farm, Newstead Way	Loughborough	15	15	Page XX
HA20	Land off Beacon Road	Loughborough B	30	40	Page XX
HA21	Part of Baxter Gate Opportunity Site	Loughborough B	210	27	Page XX
HA22	Devonshire Square	Loughborough	39	39	Page XX
HA23	Market Street	Loughborough	72	73	Page XX
HA24	Southfields Council Offices	Loughborough B	163	220	Page XX
HS25	138-144 Knighthorpe Road	Loughborough B	13	10	
HA26	Former Limehurst Depot	Loughborough B	138	138	Page XX
HA27	Former Main Post Office, Sparrow Hill	Loughborough B	16	16	Page XX
HA28	Land off Derby Square	Loughborough B	43	10	Page XX
HA29	Southfields Road Car Park	Loughborough B	33	29	Page XX

Total: 2,242				2,590	
Policy Ref	Site Name	Location	Number of Homes	SHELAA	Site Specific Policy
Shepshed Urban Area					
HA30	Land off Fairway Road	Shepshed	100	378	Page XX
HA31	Land north of Ashby Road,	Shepshed	190	?	Page XX
HA32	Land off Tickow Lane (south)	Shepshed	300	540	Page XX
HA33	Land at Oakley Road	Shepshed	133	133	Page XX
HA34	Land off Tickow Lane (north)	Shepshed	394	394	Page XX
HA35	Land North of Hallamford Road and West of Shepshed	Shepshed	250	250	Page XX
HA36	20 Moscow Lane	Shepshed	49	49	Page XX
HA37	Land rear of 62 Iveshead Road	Shepshed	68	76	Page XX
HA38	Land to rear of 54 Iveshead Road	Shepshed	5	5	Page XX
HA39	Land fronting Ashby Road and Ingleberry Road	Shepshed	151	200	Page XX
HA40	Land to the west of the B591/Ingleberry Rd & north of Iveshead Lane	Shepshed	174	?	Page XX
HA41	Land south of Ashby Road Central	Shepshed	49	49	Page XX
HA42	32 Charnwood Road	Shepshed B	15	15	Page XX
Total 1,878				2,453	
Service Centres					
HA43	Land west of Anstey (110+623 +343)	Anstey	600	1076	Page XX
HA44	Fairhaven Farm	Anstey	47	47	Page XX
HA45	Land to south of Melton Road	Barrow upon Soar	130	130	Page XX
HA46	Land off Melton Road	Barrow upon Soar	120	120	Page XX
HA47	Land adjoining 84 Melton Road	Barrow upon Soar	18	18	Page XX
HA48	Land off Willow Road	Barrow upon Soar	215	183	Page XX
HA49	Land off Cotes Road	Barrow upon Soar	220	?	Page XX
HA50	East of Loughborough Road	Quorn	75	105	Page XX
HA51	Land south of Rothley	Rothley	40	40	
HA52	971 Loughborough Road	Rothley B	9	25	
HA53	Land off Barnards Drive	Sileby	228	228	Page XX
HA54	Land off Homefield Road	Sileby	55	44	Page XX
HA55	Rear of The Maltings High Street	Sileby B	13	13	Page XX
HA56	Land off Kendal Road (South of Butler Way and Gray Lane)	Sileby	24	32	Page XX
HA57	36 Charles Street	Sileby B	11	11	
HA58	9 King Street	Sileby B	14	14	Page XX
Total 1,819				2,306	

Policy Ref	Site Name	Location	Number of Homes	SHELAA	Site Specific Policy
Other Settlements					
HA59	Land to rear of Derry's Garden Centre	Cossington	124	229	Page XX
HA60	Land off Melton Road	East Goscote	223	270	Page XX
HA61	Land to the rear of 89 Loughborough Road,	Hathern B	29	41	Page XX
HA62	The Leys	Hathern	6	6	
HA63	Land off Zouch Road	Hathern B	50	50	Page XX
HA64	Land at Threeways Farm	Queniborough	100	195	Page XX
HA65	Land off Melton Road	Queniborough	55	63	Page XX
HA66	Land off Gaddesby Lane	Rearsby	47	47	
HA67	44 Hoby Road	Thrussington	30	10	Page XX
HA68	Land off Old Gate Road	Thrussington	60	60	Page XX
HA69	The former Rectory and Land at Thurcaston	Thurcaston	31	31	Page XX
N/A	Wymeswold NP housing requirement		60	?	
Total: 815				1,062	
Grand Total: 8,858				10,568	1,710



The countryside charity
Leicestershire

Charity Number: 1164985

Charnwood Local Plan

Report on Sustainable Travel and Transport in the context of mitigating climate change for CPRE Leicestershire

John Marriott

August 2021

1. Introduction

This technical report provides evidence in support of our objections to Policies CC5, INF1 and INF2 of the Charnwood Local Plan in the context of Development Strategy Policy DS1. The Plan purports to support sustainable development that seeks to minimise the need to travel, particularly by private car, and prioritises public transport, walking and cycling.

However, it is clear that the Policies as drafted, the proposed locations for development and the proposed infrastructure sought, will not achieve any significant shift to public transport, walking and cycling. However, they will facilitate and encourage an increase in car travel and carbon emissions. **This is inconsistent with NPPF Para 152 and a legal duty on LPAs to ensure that policies designed to secure the development and use of land contribute to the mitigation of climate change.**

It has been written by John Marriott, a trustee of CPRE Leicestershire, who was involved in transport and local planning matters during his career in Leicestershire. He was a Chartered Engineer and has experience of transport scheme inception and design, transport planning, data collection and analysis, transport modelling and the development plan system.

Note that developments that have been referred to as Sustainable Urban Extensions (SUEs) are henceforth called urban extensions because there is no evidence, they will be any more sustainable than existing developments. Many of the 'Garden Communities' developments have also been shown to be very poor in terms of meeting their grandiose claims and they are typically highly car-dependent.

A number of questions on transport were put to CBC in July 2021. The Borough Council's response and comments on the answers are included as Appendix 2.

Policy CC5 Sustainable Transport (p178) states "We will support sustainable patterns of development which will minimise the need to travel and seek to support a shift from travel by private car to walking, cycling and public transport."

It also states that "We will work with our partners to secure funding for and delivery of sustainable transport improvements."

However, although the aim of Policy CC5 (and others) to support development that minimises the need to travel, particularly by private car, is supported, I consider that the detail of the policy is flawed and the Local Plan fails to demonstrate how this will be achieved. Similar policies in the Adopted Plan appear to have had little influence on the transport provision or design and layout of developments that have been approved and there is no sign of any serious attempt to reduce car use. There is no effective monitoring system in place.

Policy INF1 Infrastructure and Developer Contributions supports development that contributes to on and off-site infrastructure that it claims is required to mitigate the impacts and support sustainable development.

Policy INF2 Local and Strategic Road Network refers specifically to mitigating *"the impacts of development with infrastructure which supports sustainable transport choices (including walking, cycling and the use of public transport) prioritised before any improvements to the local and strategic highway network."*

This proposed infrastructure is set out in Appendix 3 - Infrastructure Schedule.

It is evident that most of the transport funding being sought for infrastructure that would both increase the capacity of the highway network and facilitate an increase in car use. This is not consistent with the aim of the plan to prioritise sustainable transport modes or to reduce Climate Emissions.

In the light of that this report considers how the Local Plan takes into account Government Policy and commitments to climate change and whether the policies in the plan are robust enough to ensure that the Borough Council has met its legal duty to take this into account when producing the Plan and has informed our formal responses to the Plan.

2. Climate Change

Section 19 of PCPA 2004 (preparation of local development documents) states that *"(1A) Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change."* [emphasis added]

However, successive Governments have been very slow to recognise the urgency of dealing with climate change and in showing how they intend to meet their obligations.

The IPCC's 6th Report, released in August 2021, shows the extent of the climate change challenge and how it gets more difficult the longer it takes to start taking it seriously.

Development already committed, like Thorpebury, will still be ongoing in 2037. Developments can be expected to have a lifetime of many decades, so those approved now will extend far beyond the Government's commitment to reduce carbon emissions by 100% by 2050.

If the Government wants to fulfil its obligations on Climate Change it cannot allow any more developments which facilitate and encourage a greater need for the carbon intensive manufacture and use of vehicles like cars. It shouldn't be supporting the construction of significant carbon intensive infrastructure that will increase the use of such vehicles. Neither can it allow developments to proceed that are not designed to the best possible standards to reduce their impact on climate change.

Previous planning policies which have allowed car-dependent sprawl and facilitated more car use are incompatible with mitigating climate change.

3. Local Plan - Overall principles (as stated)

Para 2.38 states that

"Our strategy is to direct development to those locations where there is a genuine opportunity to walk, cycle or use public transport and which reduce the need to travel by private car. Reducing the need to travel by private car is one of the key ways in which the locational strategy can reduce contributions to climate change. In identifying sites in our development strategy, we have considered the accessibility of services and facilities by sustainable modes of transport."

Unfortunately, the extent to which the Plan's policies and locational strategy could reduce contributions to climate change has not been quantified.

This raises some important questions

- what is sustainable transport in the context of a declared CC emergency and existing legislation?
- what infrastructure or other measures are required to achieve more sustainable transport?
- could the policies ensure sites are designed to reduce the need to use cars and support alternative modes?
- what infrastructure is the plan actually seeking?

This is informed by considering

- how do people travel at present?
- have similar policies in the Adopted Local Plan been successful?
- are the proposed sites in the best locations?

MHCLG Guidance - Climate change

A particular problem with planning policy guidance and planning policies is vague or ambiguous wording, and weak policies. This can be seen in the case of sustainable development and sustainable travel and transport.

NPPF states that sustainable development has three sustainable objectives: economic, social and environmental. It states these need to be pursued in mutually supportive ways. Although these are not prioritised it seems that the economic objective is now given the most weight in the planning system.

The most recent version of NPPF, published in July 2021 is clear about the need to address climate change and to radically reduce emissions.

NPPF Paragraph 152 - July 2021

The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

More widely the Government is committed to the vital obligations of the Climate Change Act (2008) and more recently became a signatory to the Paris Agreement (2016) and the change to a 100% reduction (instead of 80%) introduced in 2019.

An important change to the NPPF is the addition of the words "including a genuine choice of transport modes)" to Paragraph 73. This was already in Para 105.

105. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes".

While this raises the questions of what is significant, what is a genuine choice of transport, and to what extent should the need to travel be limited, it is clear this is something the Local Plan should be mindful of.

Other Advice

What climate change legislation should planners be aware of?

<http://www.legislation.gov.uk/ukpga/2008/29/section/182>

Section 19(1A) of the Planning and Compulsory Purchase Act 2004

Requires local planning authorities to include in their Local Plans "***policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. This will be a consideration when a Local Plan is examined.***" [emphasis added]

Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking. To be found sound, [Local Plans](#) will need to reflect this principle and enable the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#). These include the requirements for local authorities to [adopt proactive strategies to mitigate and adapt to climate change](#) in line with the provisions and objectives of the [Climate Change Act 2008](#), and co-operate to deliver strategic priorities which include climate change.

Rising to the Climate Crisis - A Guide for Local Authorities on Planning for Climate Change, RTPI / TCPA September 2019:

<https://www.rtpi.org.uk/media/3568/rising-to-the-climate-crisis-1.pdf>

This guide states that **only by treating climate issues as central to policy formulation will a local authority have effectively discharged its duty under the 2004 Planning and Compulsory Purchase Act**. It notes that Decision-makers, including the Planning Inspectorate, **should take into account the fact that statute has much greater weight than the policy content of the NPPF**. [Emphasis added]

Sustainable Transport

In its response to the 'Planning for the Future White Paper 2020', the CIHT following discussions with the Transport Planning Society (TPS) and the RTPI, expressed the view that the White Paper would not deliver the Government's vision and would make things worse. It was particularly critical of the failure to address the critical inter-relationship of planning and transport.

<https://www.ciht.org.uk/media/12351/planning-for-the-future-ciht-submission.pdf>

Currently, however, transport and land-use planning are too often in different silos. It is vital that the transport implications of new development and transport network constraints and opportunities are considered together.

4. The Evidence Base for the Charnwood Local Plan

The Adopted Local Plan 2011-2028 (ADP)

Chapter 3: Vision and Objectives outlined some Strategic Objectives including:

- SO1 to reduce the need to travel by car and improve the alternatives
- SO7 to reduce contributions to climate change through patterns of development and transport measures;
- SO8 to develop integrated transport, improve safety and reduce the adverse impacts of traffic.

Chapter 8: Access and Travel

Policy CS17 (p86) sought to achieve a 6% shift from travel by private car to walking and cycling and public transport.

8.7 expected major developments in the Borough to extend our walking and cycling network, particularly in our strategic developments. It also said strategic developments will need effective Travel Plans which will need to be target driven and effectively monitored.

8.13 sought to achieve a 6% shift away from travel by private car across the Borough.

8.14 said that plans for new developments will make the most of existing public transport corridors as well as new services to create genuine transport choice.

It **expected** these to achieve a significantly higher shift away from travel by private car than the Borough-wide target. [emphasis added]

Monitoring of the Adopted Local Plan

The Adopted Local Plan does not mention how the 6% shift across the Borough from private car would be monitored or how a greater, unspecified, shift would be achieved or monitored from the major developments.

The Monitoring Framework included Indicators and Targets for two Access and Travel Policies CS17 and CS18.

CS17 related to the percentage of houses within 400m of a local bus service.

CS18 referred to the provision of walking, cycling and public transport to key facilities and services.

The latest Annual Monitoring Report for the Adopted Local Plan merely states:

"There have been no decisions taken which are contrary to Policy CS17 and CS18."

However, it is now clear that some houses in the urban extensions will not fall within the 400m distance. However, this is of little consequence if the bus service is inadequate in more important respects. The monitoring of CS18, provision of access to facilities and services, is a matter of fact and judgement, rather than an indication of usefulness.

The Pre-Submission Draft Local Plan 2021-2037

Profile of Charnwood (1.22): Accessibility and Transport

Car/Van ownership is stated to be 81.9% of households owning a car (2011 Census). However, this was a Borough wide figure and it is now 10 years old. Car ownership data is available for the each of the 99 Census Lower Super Output Area level (LSOAs) in Charnwood. This shows that car ownership is quite low in some parts of Loughborough, and in a few older established areas, but it is much higher in rural areas and in areas developed more recently, including those within Loughborough. The Borough wide figure also conceals a large, and growing, proportion of households owning two or more cars.

The Profile stated that 67% of Charnwood residents travelled to work by car (2011 Census). However, in Para 9.14 (p204) it states a figure of 64%. Charnwood BC has since confirmed (see Appendix 2) this is wrong as it should have been updated. It claimed the figure should be 72% including car passengers. This is also wrong, as the actual figure is 71% car drivers with a further 5% as car passengers.

The Profile claims "Loughborough has high quality bus infrastructure although it is variable elsewhere." This is very misleading both in terms of provision and its usefulness. It states that bus use for the journey to work was 5%.

It also states Charnwood has a "well developed transport network".

This is linked to statements regarding proximity to the M1 and East Midlands Airport and road links to Leicester, Nottingham and Lincolnshire. There is no detail regarding the train services or the limited use made of them. It merely mentions cycling or walking networks, but there is no detail on their limitations, actual use or limited usefulness.

Charnwood Sustainable Transport Study 2020 (CSTS)

This considered the levels of growth at that time.

2.4.5 The plan sets out the following growth needs to be met by 2028:

- *Housing need* - 13,940 (820 homes per year)
- *Business need* - 12,000 jobs on 75 Ha of land
- *Food retail* - 8,800 sqm floorspace
- *Non-food retail* - 32,800-41,600sqm floorspace

It said:

"This level of growth will pose serious challenges, as evidence suggests that traffic levels in Charnwood will increase by 19% and congestion levels will be 120% greater than that of baseline conditions come 2026."

The CSTS therefore recognised that the level of growth assumed would lead to a substantial increase in road traffic and congestion.

The Housing need figure is now 1100 homes per year.

5. How do people travel? Further analysis of the 2011 Census Information

A more detailed analysis of the Census data provides a better understanding of the variations in travel across Charnwood. This provides a much better insight of the areas where the Local Plan is proposing additional development.

Car Ownership

The proportion of one car households is fairly constant across Charnwood at between 40 and 50%. However, selecting 15 of the 99 LSOAs that are considered to be typical of the locations proposed for development, shows car ownership was at 91% in 2011. This obviously reflects a high level of car ownership which has a significant influence on how and where people choose to live, work and travel. This becomes more apparent when considering how many households own more than one car. Forty one percent (range 37 to 47%) own 2 cars, and 12% (range 9 to 16%) own 3 cars or more.

It seems probable that the 2021 Census will show even higher figures in the areas that have been developed over the last decade. This is because those areas are typically located further away from existing facilities and have few facilities of their own. People moving to most of those areas are likely to realise that any bus services or cycling or walking options on offer will not meet their expectations and therefore most will consider one or more cars to be essential to reach many facilities. Site visits to new developments confirm this.

Mode of Travel for the work journey

Across the Borough the figure is 71% for Car Drivers and a further 5% are Car Passengers. As noted above this is higher than the 67% mentioned in the Profile and the 64% mentioned in

Para 9.14. In 19 of the 99 LSOAs, the Car Driver proportion is over 80%. In most areas developed within the last 50 years it lies in the 75% to 85% range. Some areas in places like Shepshed, Barrow and Rothley, where more development is proposed, were already above 80% and even within Loughborough many were in the high 70s. Car passengers were around 5% in most areas.

The 2011 Census showed that bus use for the journey to work was extremely low. In most parts of Charnwood, it was under 5% and below 4% in 8 areas within Loughborough. In only 6 of the 99 areas did bus use exceed 9% and only one of these was in Loughborough. The other 5 were close to major radial bus routes adjacent to the Leicester City boundary and the highest one of these, in Thurmaston, only had a 13% bus share.

The highest use of bikes for the journey to work was in Loughborough. 37 of the 99 census LSOAs exceeded 4% and this included 33 of the 35 LSOAs in Loughborough. The highest proportion was 9%.

Walking accounted for over 19% of the work journeys in 20 of the 99 LSOAs (all in Loughborough) with 7 in the 30% to 40% range. In over half the areas it was under 10%, with just 2 below 4%.

Thirty nine of the 99 Census Lower Super Output Areas in Charnwood were selected as being representative of the 7 broad areas proposed for development in the Local Plan. Most mainly comprise of development completed between 1960 and 2010. The table below shows the mode share for the journey to work in these 7 areas.

Mode Share Journey to Work (Source, 2011 Census Table QS701)

Home Location	Number of Census Areas used (LSOAs)	Number travelling to work in these areas	Car Driver	Car Pass	Bus	Walk	Bike	Train	Motor Cycle
Loughborough	7	5163	76%	5%	3%	7%	5%	2%	1%
Shepshed	6	5137	77%	5%	3%	9%	4%	1%	1%
Anstey	3	2507	76%	5%	7%	7%	3%	0%	1%
Birstall	4	3568	77%	6%	7%	5%	3%	1%	1%
Rothley/Mountsorrel/Quorn	7	5943	82%	4%	5%	5%	2%	1%	1%
Sileby/Barrow	6	5081	78%	4%	4%	7%	2%	3%	1%
Thurmaston/Syston/East Goscote	6	4703	77%	5%	6%	6%	3%	2%	1%
Overall	39 of 99	32102	78%	5%	5%	7%	3%	1%	1%

The full table showing the source data and a map showing the selected areas is in Appendix 1

Home to Work Journey Destinations

The 2011 Census provides some information for the journeys between where people live and work and the mode of travel used. For this dataset Charnwood is divided into 22 larger census areas (MSOAs).

In Leicestershire walking and cycling journeys are mainly found near town and city centres. Bus journeys are almost entirely focussed on Leicester city centre, with a higher proportion

from some of its outer suburbs where car ownership has traditionally been low and bus services are much better than elsewhere. Bus use drops off significantly outside the city boundary but Anstey, Birstall and Thurmaston show significantly higher use than the remainder of Charnwood because of their proximity to Leicester and more frequent buses.

There is a very dispersed pattern of car journeys reflecting the wide distribution of workplaces. While Leicester city is dominant, the centre is not that prominent, as many people travel to outlying areas. The trend has been for jobs to move from town and city centres to more car accessible locations, particularly in close proximity to major roads or on the periphery of urban areas.

6. What opportunities exist to reduce car use?

Buses

Bus use reflects existing bus routes which focus on serving radial movements to Leicester city centre. Town bus services, like those that exist in Loughborough, also focus on the town centre. Buses are not co-ordinated to provide a network and fares are also high, particularly if multiple buses are required. Therefore, buses do not cater for the dispersed journeys most people make.

Bus deregulation was introduced outside London in 1986. The bus service is provided by commercial operators and local authorities had no powers to influence routes, the service provision or fares. Bus use outside London is about half what it was in 1986 and now London accounts for more than half of all journeys in England. Following the introduction of a new Bus Act in 2017 Metro mayors were given the ability to introduce Bus Franchising, where an authority can decide services and fares, but only Manchester has made the decision recently to take this up. Only Hertfordshire took up the other option to have an Enhanced Partnership, which does not give any powers to decide services or fares. This low take-up shows there is little enthusiasm for the provisions of the 2017 Act.

In March 2021 the Government published a Bus Strategy for England "Bus Back Better". Unfortunately, while it recognised many of the problems, it failed to tackle the problem of bus deregulation and the need to make buses work as an integrated network with adequate funding and long-term commitment. Authorities were required to state whether they wanted Franchising or an Enhanced Partnership. The hurdles for authorities which do not have a metro mayor to go for franchising are challenging and there seems to be little prospect of such authorities choosing that option. At the time of writing Leicestershire County Council and Leicester City Council had decided to seek separate Enhanced Partnerships. This reflects political expediency and ignores the fact that a single Partnership is more likely to benefit bus users.

Without any control of buses, it is effectively impossible to plan or locate new developments in a way that would optimise their operation and use. This can be seen in the urban extensions in Leicestershire (3 in Charnwood, 1 in Blaby) and in 2 large developments in north Leicester abutting Charnwood.

The three urban extensions that have been approved by Charnwood show the difficulty of designing layouts for buses into a site that may not be an ideal shape and where initial master-planning did not consider bus operations. It is unclear how much impact any subsequent negotiations have had on facilitating bus use, both in terms of the design and layout of the development or service provision. (CBC chose not to provide this information,

see Q5 Appendix 2). In all cases the destinations served are very limited and with a typical frequency of 30 minutes they are unlikely to be very attractive. It seems very unlikely that buses would attract more than the 3% of work journeys that were found in Loughborough and Shepshed in 2011.

The low density and scattered nature of many employment sites, usually provided with ample free car parking, is not conducive to bus operations. It seems likely that the International Gateway and the LSEP would follow this pattern.

Bus services provided in connection with a housing development in Anstey ceased after five years when the funding ran out. It is questionable whether the proposed bus services to the urban extensions will fare any better and there is no guarantee that they will continue if they are not viable. The prospect of achieving useful bus provision for smaller developments does not look at all promising given what has been achieved for the larger developments. This is acknowledged in the WYG Charnwood Sustainable Transport Study (1.3.7)

Walking and cycling

Most journeys are very short - 78% are less than 5 miles. The vast majority of journeys over a mile are made in a car or van — even for distances of 1–2 miles over 60% of journeys were made by motor vehicle. (NTS0308) One of the major difficulties of planning for increased cycling and walking is the prominence given to cars and legitimate safety concerns. This has the effect of creating sprawling developments in poor locations usually with limited facilities. Given the right conditions a high proportion of journeys could be walked or cycled. This is now evident in a significant number of places where it has been the awarded the prominence and funding it deserves. Cities in the Netherlands and Denmark have been transformed and Waltham Forest has also made significant progress in the UK. Electric bikes and e-scooters extend the range over which low impact transport could compete with cars and these could cater for most journeys to school and encourage young people to appreciate the benefits of travelling more sustainably.

It is vital that such opportunities are maximised in the design and layout of new developments. This has led to the concept of 15-minute or 20-minute neighbourhoods where most facilities can be reached without recourse to using a car. However, there is very little sign that the approved urban extensions have sought to maximise this concept. The impression given is that these will be little different to other recent developments such as Hallam Fields (Birstall) or Grange Park (Loughborough).

A significant problem is the lack of a coherent plan to create a large, reasonably dense network of quality walking and cycling routes. This makes it difficult to integrate active travel facilities within a development with other places and consequently there are few signs that off-site links are being sought. This is in stark contrast to the efforts made to seek funding for road schemes over a wide area.

7. Roads and the Strategic Growth Plan (SGP)

The Local Plan shows that far from reducing the use of cars it seeks to increase their use. Some of this stems from the thinking behind the SGP which envisaged an A46 Expressway and other significant road schemes to increase road capacity. The SGP was produced to meet a strong growth objective, and influenced by Midland Connect, LEPs and a small group of stakeholders (mainly developers and highway authorities).

While the NPPF sees the economy as a one of the sustainable objectives the type and scale of growth must have regard to the social and environmental objectives too. The SGP showed little regard for the environment or Climate Change and was not conceived around reducing travel. It promoted development in places where it would be impossible to offer a genuine choice of transport, contrary to NPPF Para 105. The location of the LSEP (Loughborough Science and Enterprise Park) and the International Gateway close to the M1 were clearly targeted at attracting people from a wide area who would travel by car.

A key feature of the SGP is an A46 Expressway around the south and east of Leicester extending from the M69 Junction 2 to the A46 north of Leicester. The exact route has not been defined but it has been linked to proposals for a new Junction 20a on the M1 and substantial development proposals around it. This is another location which is not consistent with NPPF 105. The length of a route on this alignment would be around 40km (25 miles). Around a quarter of this route would be in Charnwood, passing east of Barkby and the Thorpebury urban extension before passing close to Queniborough to join the A46 near Ratcliffe on the Wreake.

In November 2020 Midlands Connect stated that there was no justification for a road to Expressway standards around the east of Leicester. However, it suggested that a road to a lower standard could still be built to facilitate the SGP development aspirations. This proposes up to 40,000 houses in greenfield locations where it will be impossible to offer the genuine choice of transport modes envisaged by NPPF 105.

It is highly questionable whether there is ever likely to be funding for a road along the general lines of that envisaged for the expressway. The difficulty of making a case for an expressway and acquiring the necessary land and funding have always looked extremely challenging. This would be even more difficult to achieve or justify if attempted in phases linked to development and lacking a strategic motive.

CPRE Leicestershire has previously made strong representations to the County Council regarding both the SGP and the associated developments that would rely on new roads. With a growing awareness of the climate change challenge and the need for more sustainable travel it is even more urgent that the SGP must be reviewed soon. Charnwood has so far supported the SGP but this is not tenable if it takes its climate change obligations seriously.

8. Infrastructure sought for the Local Plan

It is clear that Charnwood's thinking for the LP has been influenced by discussions with Highways England (HE) regarding the Strategic Road Network (SRN) and the City and County councils as Local Highway Authorities (LHAs).

A significant concern for the highway authorities is congestion on SRN and in particular along the M1 and the A46 Leicester Western Bypass (LWBP), which opened in 1995. Problems at the junction of the M1 (J21) and M69 were exacerbated following the opening of the LWBP. Over the last 25 years all of the junctions on the LWBP and M1 Junction 21 have been changed to increase capacity but more ambitious schemes have not been pursued. The impact of additional development in the Local Plan has prompted further consideration of capacity increasing options.

The approach taken has been to look to traffic modelling to assess the capacity of the road network having regard to assumptions regarding traffic growth and an assessment of the traffic that would be generated by the proposed developments. This is known as 'predict and provide'. The assumption is that measures can be found which will increase the capacity of the road network to mitigate the impact of the additional traffic.

There are several problems to this approach:

- the modelling process is poor at assessing overloaded networks;
- it assumes historic trends continue;
- it can be exceedingly difficult or impossible to find appropriate and acceptable measures at an affordable cost;
- the timescale and delivery of such measures cannot be guaranteed;
- increasing the capacity of the road network facilitates more car-dependent development and more traffic growth;
- the cycle repeats.....

During the preparation of the Draft Local Plan Charnwood commissioned the County Council to assess the impact of the Plan using its traffic model. This showed that the network would be heavily overloaded and a second attempt was made to assess the network having assumed that many junctions could have their capacity increased by 20% (10% in Leicester city). This did not solve the traffic problems but it did mitigate them. However, it is simply not realistic to assume the capacity of so many junctions could be increased to this extent.

For the Pre-submission Plan Charnwood commissioned AECOM to do the modelling. This is discussed in the PRTM CLP Base Model Review, a Traffic Forecasting report, a Traffic Mitigation report and at least 6 other documents including spreadsheets and meeting notes. The aim in early 2021 was clearly to produce a "long list of interventions" some of which have been included in Appendix 3 - Infrastructure Schedule.

A transport model is a 'black box' containing many assumptions. These can be complex and the initial input, inner workings or outputs are rarely revealed for examination. Experience over time suggests that there are often huge discrepancies between predictions and actual outcomes. Obviously, the implications of Covid were not predicted in any model. It would also seem that little consideration has been given to climate change.

Policy INF1 (p203) seeks funding for infrastructure to mitigate the impacts and support sustainable development. This Policy is frequently mentioned throughout the Plan in connection with various developments.

Appendix 3 of the LP includes 64 local transport schemes covering new roads and junctions, other highway schemes and sustainable transport measures (walking, cycling and public transport). These total £88 million, excluding any works needed for the LSEP and the cost of Travel Plans. Most of this (77%) is related to the three approved urban extensions. All local transport schemes are deemed to be essential. The distribution of the funding to roads, public transport (bus) and walking and cycling (active travel) is shown in the table below.

Local Transport Schemes Spend in £millions and percentage by mode

To be funded by Developers, S106 or the Local Highway Authority

	Road	%	Bus	%	Active	%	Total	%
Garendon UE	22.105	96	0.016	0	0.915	4	23.036	36
Thorpebury UE	30.275	88	1.687	5	2.527	7	34.489	39
Broadnook UE	9.600	94	0.150	1	0.512	5	10.262	12
Others	12.104	61	0.831	4	6.843	35	19.778	23
Total	74.084	85	2684	3	10.797	12	87.565	

It can be seen that 91% of the funding for the three urban extensions has been weighted very much towards roads. This gives little hope that these developments will achieve a reduction in car use.

While the balance is geared more towards active travel for the other sites proposed this is because it includes 6 cycleways at an estimated cost of £5.7m but no details of these have been provided. A significant change to overall thinking about the priority and funding of active travel and public transport will be required to reduce car use.

The Strategic Road Network (SRN)

The SRN comprises the motorways and trunk roads managed by Highways England.

A free flow interchange between the M1 and the M69 has been considered since the 1990s when it was realised that the addition of the Leicester Western Bypass (LWBP) at Junction 21a would cause congestion problems. Midlands Connect had been considering proposals to add additional lanes to the LWBP as part of grander plan to increase the capacity of the A46. This was a factor that led the County Council to propose an eastern Expressway route as an alternative. Midlands Connect announced in November 2020 that this has no strategic justification.

There is now considerable uncertainty over Highways England's plans for the rollout of more 'Smart' Motorways. Some projects in HE's Road Investment Strategy (RIS2), such as the Stonehenge Tunnel and the London Lower River Crossing have been subjected to legal challenge. The Strategy is also being contested in terms of its sustainability having regard to Climate Change and the traffic growth it would facilitate and encourage.

Although much consideration has been given to the SRN proposals in the modelling of the Local Plan it far from clear what will survive. A remarkable statement in one of the modelling documents was that congestion on the LWBP could cause more traffic to pass through Anstey. This is untenable, but it shows that modelling congested networks and interpreting the results is a far from reliable process. It is also notable is that further works are proposed to M1 J23 where £10m has just been spent.

The SRN schemes included in LP Appendix 3

Scheme	Cost £ millions
A46 - Smart technology to manage build-up of traffic flows on A46 between M1 J21a and north of the Hobby Horse roundabout	10
A46/Wanlip Road slip road layout changes	1.5
A46/A607 Hobby Horse Roundabout improvements with segregated A46 west to east link	15
A46/A6 Loughborough Road Interchange	4
M1 Leicester Western Access - Smart Motorway scheme J21-J21a	20
M1 North Leicestershire Extra Capacity - Smart Motorway Scheme J21a-J23	75
M1 Junction 21 - M1/M69/A5460 - Interim Intervention	2.725
M1 Junction 21 - M1/M69/A5460 - Free flow interchange links between M1 and M69	120

An alternative approach to forecasting is called 'back-casting' where the outcome is decided first and then actions are devised to reach that outcome. This would seem to be an appropriate option with regard to meeting climate obligations and deriving a timetable to achieve them.

9. Monitoring (p 206)

This states:

"It is important that our local plan can be implemented and that the delivery and effectiveness of its policies against our objectives and timescales are monitored to ensure that our spatial vision for Charnwood is being delivered."

Charnwood Local Plan Monitoring Framework

Policy DS1 There is no indicator that would show how this policy is minimising the need to travel or prioritising public transport, walking and cycling.

Policy CC5 (3 Indicators and Targets)

- Indicator Railway station entry and exits.
- Target A modal shift towards increased rail use.

This indicator would not provide an indication of modal shift; an increase could result purely from the additional development proposed.

The Borough Council has no control over rail services and only a very small proportion of the proposed development is located near a railway station. It would be a poor indicator anyway given the relatively low use of rail as a mode of transport within Charnwood.

- Indicator Bus usage data.
- Target A modal shift towards increased bus use.

This indicator would not provide an indication of modal shift; an increase could result purely from the additional development proposed.

Most bus services are provided by commercial operators who have shown considerable reluctance to provide the sort of usage data that would be required to monitor usage of

their services. The Borough Council may be able to seek such data if it makes the necessary agreements with the operators where it is linked to a Travel Plan required for a particular development.

- Indicator Amount of new development at Sustainable Urban Extensions and service centres with access to a half-hourly frequency public transport service.
- Target 100% of new houses to be within 400 metres of a local bus service are achieving their stated objectives.

This Indicator does not specify how the 400 metres would be measured, the type of the service, the direction and days and hours of operation, or the places served. It would provide no indication of whether the bus services were actually useful or the extent to which they reduced car travel.

Policy INF2 Local and Strategic Road Network

- Indicator None
- Target None

The Plan states that *"No indicator - it is considered that 100% of applications would meet the policy unless material considerations justify otherwise."*

10. Conclusions

CPRE considers the plan is fundamentally unsound in terms of both the Government's and Charnwood Council's own goals to reduce Carbon Emissions and mitigate the impact of Climate Change.

The reliance in the plan on development sites in unsustainable locations, which are likely to be heavily reliant on car travel, and the lack of any accountable way of measuring the impact on Climate Change of those developments, coupled to infrastructure spending skewed to delivering that unsustainable strategy means the plan is unsound.

CPRE does not have the technical knowledge to identify the exact target for carbon reduction which the plan should adopt, but it is imperative that the Council undertake work to identify the correct level. That would then form the basis for rewriting policies DS1, CC5, INF1 and INF2 to create a sound approach to Climate Change and sustainable transport and could impact both on the development pattern in Charnwood District and on the content of Appendix 3.

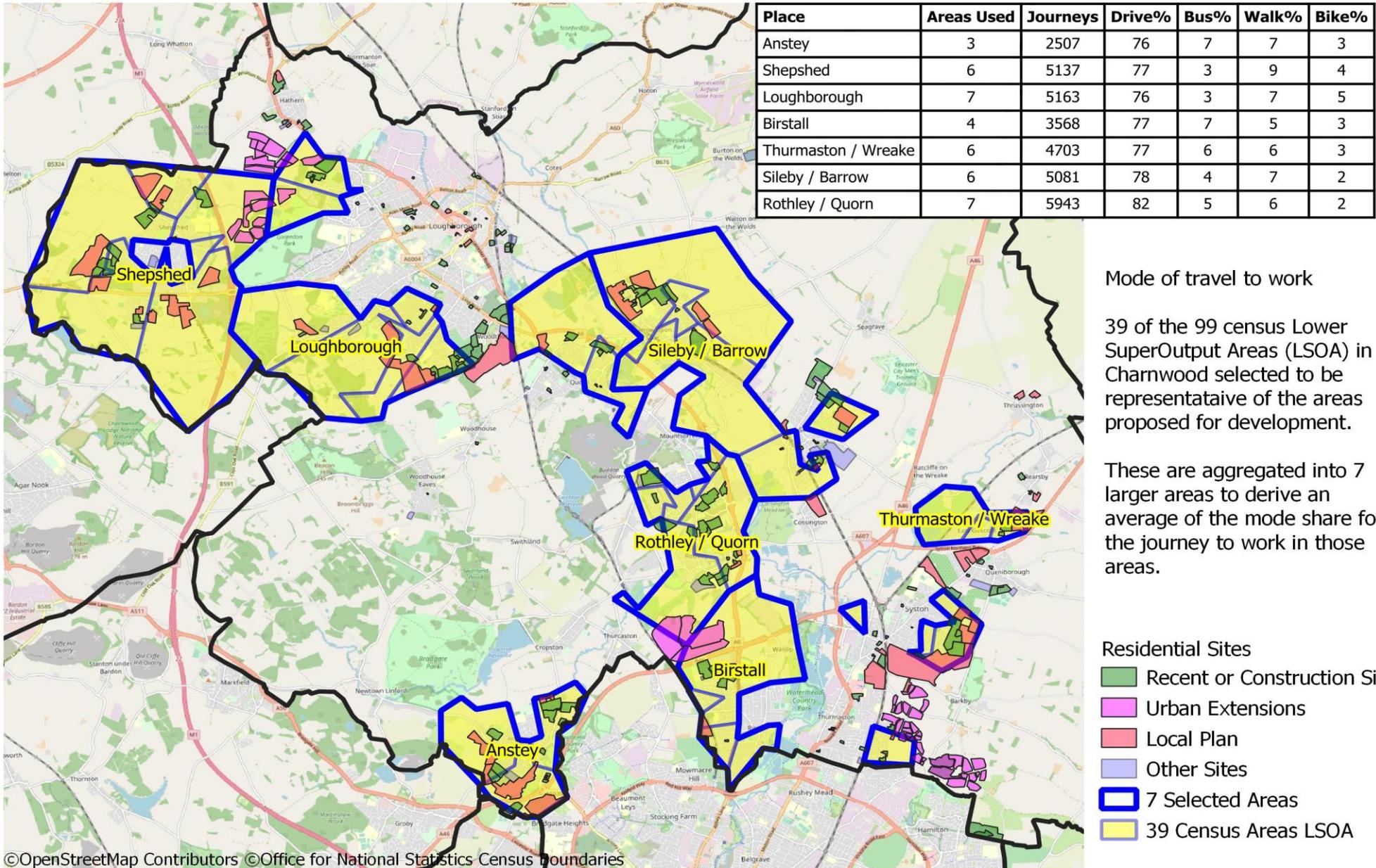
Appendix 1 Full table of the Mode of travel to work data for the 39 areas

Mode of Journey to Work for selected Census output areas chosen to represent areas where most Local Plan development is planned

Source 2011 Census

Area	Indicative location	LSOA_Name	Easting	Northing	Drive	Pass	Bus	Walk	Bike	Train	M/C	Taxi	Metro	Other	Journey	Home	Not emplo	All	Drive%	Pass%	Bus%	Walk%	Bike%	Train%	M/C%	Taxi%	Metro%			
Loughborough	Lbro Buckingham Dr	Charnwood 004E	451048	320141	540	39	26	57	42	7	7	1	1	6	726	26	327	1079	74	5	4	8	6	1	1	0	0			
Loughborough	Lbro Fairmeadow	Charnwood 010F	453271	316957	919	53	27	60	57	23	8	2	4	5	1158	75	331	1564	79	5	2	5	5	2	1	0	0			
Loughborough	Lbro Maxwell Dr	Charnwood 001E	451009	320674	797	59	39	92	48	18	15	2	2	3	1075	50	399	1524	74	5	4	9	4	2	1	0	0			
Loughborough	Lbro Nanpantan Rd	Charnwood 010A	451278	317686	384	27	19	38	28	13	0	0	0	5	514	35	395	944	75	5	4	7	5	3	0	0	0			
Loughborough	Lbro Outwoods Dr	Charnwood 010C	452736	317911	457	35	12	58	37	11	5	2	1	3	621	63	370	1054	74	6	2	9	6	2	1	0	0			
Loughborough	Lbro Valley Rd	Charnwood 010E	452002	317782	396	18	15	45	31	14	1	0	0	4	524	47	283	854	76	3	3	9	6	3	0	0	0			
Loughborough	Lbro Woodbrook Vale	Charnwood 010C	452839	317388	422	33	8	31	33	4	8	1	0	5	545	27	357	929	77	6	1	6	6	1	1	0	0			
Shepshed	Shepshed Brook St	Charnwood 005E	448032	320366	529	37	19	59	31	5	6	0	0	0	686	25	385	1096	77	5	3	9	5	1	1	0	0			
Shepshed	Shepshed Centre	Charnwood 006C	448216	319721	716	53	35	93	52	5	9	1	0	8	972	47	358	1377	74	5	4	10	5	1	1	0	0			
Shepshed	Shepshed Glenmore Pk	Charnwood 005C	447620	319687	615	45	35	109	30	8	4	1	1	8	856	32	403	1291	72	5	4	13	4	1	0	0	0			
Shepshed	Shepshed SE	Charnwood 006A	447960	318801	580	41	25	86	19	1	7	2	0	0	761	46	368	1175	76	5	3	11	2	0	1	0	0			
Shepshed	Shepshed SW	Charnwood 005A	447040	318754	828	38	26	57	30	5	8	2	0	2	996	55	414	1465	83	4	3	6	3	1	1	0	0			
Shepshed	Shepshed Trueway Dr	Charnwood 006E	448408	319107	670	45	37	77	22	3	9	2	0	1	866	37	295	1198	77	5	4	9	3	0	1	0	0			
Anstey	Anstey NE	Charnwood 022E	455335	309060	675	44	59	68	32	5	8	0	0	6	897	51	405	1353	75	5	7	8	4	1	1	0	0			
Anstey	Anstey NW	Charnwood 022C	454540	308861	690	36	56	50	18	5	8	3	0	4	870	48	390	1308	79	4	6	6	2	1	1	0	0			
Anstey	Anstey S	Charnwood 022C	454925	308513	547	39	63	56	24	1	2	2	0	6	740	39	379	1158	74	5	9	8	3	0	0	0	0			
Birstall	Birstall Greengate, Hallam Field	Charnwood 019A	453002	309862	885	59	92	66	40	10	6	2	0	3	1163	50	512	1725	76	5	8	6	3	1	1	0	0			
Birstall	Birstall Greengate	Charnwood 019E	458563	309808	587	43	52	39	19	3	10	4	5	5	767	38	374	1179	77	6	7	5	2	0	1	1	1			
Birstall	Birstall Park Rd	Charnwood 020A	458895	308960	686	55	65	38	33	5	5	0	2	1	890	45	311	1246	77	6	7	4	4	1	1	0	0			
Birstall	Birstall S	Charnwood 019C	453290	308488	588	44	42	27	28	9	5	0	2	3	748	62	356	1166	79	6	6	4	4	1	1	0	0			
Rothley / Quorn	Rothley	Charnwood 014F	458211	312808	490	15	29	49	18	5	2	0	3	1	612	61	335	1008	80	2	5	8	3	1	0	0	0			
Rothley / Quorn	Mountsorrel Bier Way	Charnwood 014E	458725	313158	792	41	46	49	14	4	5	0	3	3	957	62	282	1301	83	4	5	5	1	0	1	0	0			
Rothley / Quorn	Mountsorrel Cross Ln	Charnwood 014C	458008	313952	699	51	62	43	23	3	8	0	0	1	890	42	395	1327	79	6	7	5	3	0	1	0	0			
Rothley / Quorn	Mountsorrel E	Charnwood 014A	458585	314492	871	44	63	45	24	11	13	2	0	1	1074	55	295	1424	81	4	6	4	2	1	1	0	0			
Rothley / Quorn	Mountsorrel W	Charnwood 014C	457559	313933	760	38	25	19	19	4	9	2	0	2	878	43	294	1215	87	4	3	2	2	0	1	0	0			
Rothley / Quorn	Quorn Barrow Rd	Charnwood 012A	455824	316991	655	32	31	41	26	13	3	2	1	2	806	62	318	1186	81	4	4	5	3	2	0	0	0			
Rothley / Quorn	Quorn Centre	Charnwood 012E	456397	316676	579	31	32	43	21	11	4	0	0	5	726	53	328	1107	80	4	4	6	3	2	1	0	0			
Sileby / Barrow	Sileby E	Charnwood 013C	460891	315618	582	34	37	52	25	25	10	0	0	2	767	27	289	1083	76	4	5	7	3	3	1	0	0			
Sileby / Barrow	Sileby S	Charnwood 013A	460359	314675	907	47	58	75	20	40	6	1	0	3	1157	49	429	1635	78	4	5	6	2	3	1	0	0			
Sileby / Barrow	Barrow Centre	Charnwood 011B	457740	317249	591	38	16	43	21	25	3	0	0	2	739	48	344	1131	80	5	2	6	3	3	0	0	0			
Sileby / Barrow	Barrow N	Charnwood 011C	457563	318050	878	38	21	54	23	25	10	2	0	3	1054	69	426	1549	83	4	2	5	2	2	1	0	0			
Sileby / Barrow	Barrow NE	Charnwood 011D	458027	317754	453	33	24	53	16	23	5	0	0	1	608	36	327	971	75	5	4	9	3	4	1	0	0			
Sileby / Barrow	Barrow SE	Charnwood 011A	458412	316834	577	34	35	57	11	31	6	0	1	4	756	38	354	1148	76	4	5	8	1	4	1	0	0			
Thurmaston / Wreake	Thurmaston Colby Dr	Charnwood 021A	461935	308723	538	31	58	48	20	4	2	0	0	1	702	25	383	1110	77	4	8	7	3	1	0	0	0			
Thurmaston / Wreake	Syston College Rd	Charnwood 018C	462963	311035	496	35	33	55	24	11	3	2	0	3	662	20	307	989	75	5	5	8	4	2	0	0	0			
Thurmaston / Wreake	Syston E	Charnwood 018A	463331	311353	800	55	54	84	35	18	4	1	0	5	1056	27	415	1498	76	5	5	8	3	2	0	0	0			
Thurmaston / Wreake	Syston Glebe Wy	Charnwood 017E	461543	311528	627	56	50	41	18	23	5	0	1	1	822	18	284	1124	76	7	6	5	2	3	1	0	0			
Thurmaston / Wreake	East Goscoate N	Charnwood 015E	464274	313582	644	40	31	40	15	7	8	0	0	7	792	18	303	1113	81	5	4	5	2	1	1	0	0			
Thurmaston / Wreake	East Goscoate W	Charnwood 015A	463946	313328	526	31	38	36	19	12	5	0	0	2	669	21	306	996	79	5	6	5	3	2	1	0	0			
Total all areas					24976	1567	1495	2133	1046	450	242	39	27	127	32102					78%	5%	5%	7%	3%	1%	1%	0%	0%	0%	100%
Aggregated area statistics																														
	Areas used				Drive	Pass	Bus	Walk	Bike	Train	M/C	Taxi	Metro	Other	Journeys				Drive%	Pass%	Bus%	Walk%	Bike%	Train%	M/C%	Taxi%	Metro%			
Loughborough	7				3915	264	146	381	276	90	44	8	8	31	5163				76	5	3	7	5	2	1	0	0			
Shepshed	6				3938	259	177	481	184	27	43	8	1	19	5137				77	5	3	9	4	1	1	0	0			
Anstey	3				1912	119	178	174	74	11	18	5	0	16	2507				76	5	7	7	3	0	1	0	0			
Birstall	4				2746	201	251	170	120	27	26	6	9	12	3568				77	6	7	5	3	1	1	0	0			
Rothley Moutsorrell Quorn	7				4846	252	288	289	145	51	44	6	7	15	5943				82	4	5	5	2	1	1	0	0			
Sileby Barrow	6				3988	224	191	334	116	169	40	3	1	15	5081				78	4	4	7	2	3	1	0	0			
Thurmaston Syston East Goscoate	6				3631	248	264	304	131	75	27	3	1	19	4703				77	5	6	6	3	2	1	0	0			
Total all areas					24976	1567	1495	2133	1046	450	242	39	27	127	32102				78	5	5	7	3	1	1	0	0			

Mode of Travel to Work in areas where most development is proposed - 2011 Census



Appendix 2

Charnwood Local Plan Consultation

Transport and Sustainable Travel Questions put to CBC by CPRE

Covering email

Thank you for meeting with myself, Rick and Joyce on Friday and for patient way in which you and Michael explained aspects of the Plan and answered our questions. It was a useful meeting.

Clearly, the Local Plan places a great emphasis on achieving much higher levels of walking, cycling and public transport use to reduce car use. This emphasis is reinforced in July 2021 by the NPPF Chapter 9 and the Department of Transport's Decarbonisation Plan.

As I indicated to you, our colleague working on the transport and travel aspects of the Plan has a number of questions which are set out below. This is a central area of concern for CPRE.

Questions in Black were put to Clare Clarke CBC on 27 July 2021 by CPRE

Answers in Red were received from Paul Gilding CBC on 3rd August 2021
Bold emphasis has been added by JM

Comments on the CBC answers by JM are in Blue.

1. To what extent has CBC (Charnwood Borough Council) assured itself that the approach taken in the LP (Local Plan) is consistent with a Climate Emergency?

The entire Local plan has been formulated in the context of addressing climate change and a variety of relevant evidence base documents have informed its preparation.

These appear to be a Sustainability Appraisal and the Sustainable Transport Study and some 2011 Census data. There is little to show that these have considered the extent to which the LP policies would contribute to mitigating the impact on climate change or how they could be more effective.

It is identified in the Vision, which sets out our local priorities and is then reflected in the Objectives, which seek to achieve this Vision. The strategy for Charnwood's future development was produced in the context of reducing the Borough's contribution to climate change and addressing its impacts and this is reflected throughout the various policy areas and site allocations. **There is a dedicated chapter of the Plan on Climate Change** which contains policies relating to flooding, renewable and low carbon energies, sustainable construction and transport.

The Travel and Transport elements of this chapter contain aspirations with little to show effectiveness.

Climate change has been a key issue which has formed part of the framework for the sustainability appraisal of the Plan and in its appraisal of the Plan as a whole state:

*“Employment and housing growth could lead to an increase in carbon emissions. **However, carbon emissions savings are likely to be achieved overall due to a focus on sustainable transport, identifying locations suitable for wind energy schemes, increasing tree coverage and improving the efficiency of development. On balance, minor positive effects are predicted.**”*

There is little evidence of a focus on sustainable transport apart from aspirations.

2. How was the 64% car mode share figure (LP 9.14) derived? How does this relate to the developments proposed in the plan and data from the 2011 Census which shows that car mode share lies mostly between 75% and 85% outside Loughborough?

The figure is derived from the evidence produced in support of the Core Strategy and based upon Census details available at the time, this should have been **updated** to reflect the 2011 census data which if **you include passengers as well as drivers shows that 72% of travel to work is by car.**

It does not state when the Core Strategy evidence was produced. It appears to suggest it was not based on the 2011 census.

The 72% figure is still not correct. The actual figure is 71% Car Drivers and a further 5% Car Passengers. (76% combined)

This has been noted as an error, we welcome you drawing this to our attention and encourage you to make reference to this needing to be updated in your representation. The development proposals have been considered in the context of providing good access to services, facilities and employment opportunities with the aim of encouraging sustainable modes of travel.

3. What evidence does CBC have to show that existing public transport in Loughborough or near Leicester is good? (LP 3.24) What usage data has CBC got to support this assertion?

The Borough Council has undertaken a Charnwood Sustainable Transport Study to inform the Plan, available to view here: https://www.charnwood.gov.uk/pages/charnwood_sustainable_transport_study.

The CSTS (3.6) points out that bus use patronage on individual routes is not available because it is commercial information. It refers to bus use data supplied to DfT by each highway authority. This shows Leicestershire has the lowest bus use in the East Midlands. It also refers to a Leics CC Transport Trends document which showed bus use in Loughborough had fallen by 10% between 2011 and 2015/16. (9% in Leicester)

4. Has CBC got any evidence to confirm that bus operators will deliver a public transport system that will be genuinely attractive? What specific discussions have there been with bus operators regarding the proposed sites?

The Charnwood Sustainable Transport Study was produced with input from bus operators. **Discussions in relation to specific sites have not taken place as the local plan does not have any control over the operations of private bus companies, however the development pattern aims to support the use of sustainable forms of transport including public transport.**

It appears there is no evidence to confirm that bus operators will provide a genuinely attractive bus service. It is of some concern that CBC has not discussed how buses could serve the sites proposed. To be effective this needs to be considered before sites are chosen.

5. Could CBC provide a list of all the changes that were suggested to the developers of the SUE's to ensure they were designed to facilitate efficient and effective bus operations and say which of these were included in the S106 Agreements?

The Sustainable Urban Extensions all benefit from outline planning consents and **these details would not provide clarification** on proposals in the Charnwood Local Plan 2021-2037.

While such discussions would not provide clarification on the new Local Plan sites it would show the extent to which CBC had been able to influence the design of the large Urban Extension sites (Policies LUA2, LUA3 and LUC2) to facilitate bus operation. It appears that few, if any changes were made. This is relevant to smaller sites where it will be much more difficult to achieve good bus penetration or any services at all.

6. The SUEs were approved on the basis that they would include on-site facilities to reduce car journeys. What guarantee is there that the proposed on-site facilities within the approved SUEs will actually be completed to achieve the predicted reduction in off-site car journeys?

There are S106 agreements and conditions on phasing in place on the outline planning approvals for the SUEs to ensure this.

There appears to be no guarantee that District or Local Centres will be provided to the extent envisaged if circumstances change. A planned local centre for a recent development in Loughborough was not implemented.

7. New LP sites are much smaller than the SUEs and therefore are likely to lack the "self-containment" features of them and the ability to design them for efficient bus use. What evidence exists to show that it will be possible to achieve modal shift from these developments?

The development strategy focusses growth in **locations which reduce the need to travel by car and increases the use of sustainable modes of transport** i.e., locations with a range of services and facilities available and **where there is an existing good bus service.**

This does not answer the question. It is an aspiration.

8. A 2019 report, "CBC LP Mitigation Testing", was produced by the County Council at the request of CBC. That report assumed that theoretical widespread measures could improve road capacity by 10% in Leicester City or 20% elsewhere. Since the number of dwellings proposed in the LP has increased considerably. To what extent did CBC assure itself that such measures could be achieved or that they would be acceptable?

Initial transport reports examined seven development options for the amount and distribution of growth. This included high growth options for 15,700 new dwellings, considerably higher than the 8,858 new homes proposed in the Plan. The road improvement capacities quoted was a simplified approach considered proportionate for the purposes of the high-level option sifting stage. More detailed transport work has been undertaken since this date to better understand the impacts and this is on-going. The latest evidence can be viewed here:

https://www.charnwood.gov.uk/pages/transport_assessment

The question was not answered. There is no prospect whatsoever of achieving a general increase in road capacity of that magnitude and it is surprising that this was considered.

9. Since then CBC has obviously spent considerable time and effort on more Traffic Modelling. What this shows is that the road network will not be able to cope with the forecast traffic. (LP 9.17 recognises this}. The approach taken is to seek infrastructure to increase road capacity. How does this approach achieve modal shift?

The suggested mitigation package to address traffic resulting from development includes a variety of sustainable transport measures. **Further work is on-going to refine the mitigation package.**

This does not answer the question regarding modal shift. It confirms that the list of measures in Appendix 3 is not finalised and that more work is still being done to examine options for increasing road capacity.

10. A list of local transport related schemes/measures considered essential for delivery of the Local Plan is included in the LP with funding envisaged from S106 Agreements or the Local Highway Authority (LP 9.19 refers) together with several schemes on the SRN. The total cost the local schemes is around £87.6 million with £74.1m (85%) allocated to road schemes, £2.7m (3%) allocated for bus measures and £10.8m (12%) for active travel.

How has CBC assured itself that this is an appropriate split for a Local Plan that seeks to prioritise non-car modes? What assurance can CBC provide to show that the schemes proposed are acceptable and that they will be completed / achieved within the Plan period? Has CBC received any assurance that the SRN schemes will be completed within the Plan period?

The work to date **provides a good understanding of the impacts of the local plan and the mitigation required. The viability of the local road network improvements have been tested and found to be deliverable** and the interventions necessary on the SRN are being investigated further with Highways England. The Council is continuing to work with Leicestershire County Council, Leicester City Council and Highways England **to refine our understanding of all the mitigation measures required, this includes considering the further potential for sustainable modes of transport to address the impacts of development.**

This does not answer the question regarding modal shift. It does not explain how the local road network "improvements" have been found deliverable and there is an incomplete understanding of the mitigation measures. There remains uncertainty with regard to the SRN schemes. It is not clear who is considering the potential for sustainable modes of travel to address the impacts of development.

11. What consideration has been given to transport indicators as part of effective monitoring to show how the LP policies will actually achieve greater use of public transport and active travel?

The monitoring of the Local Plan is an important part of understanding how our spatial vision is being delivered in practice; **however, it would be difficult for the Borough Council to effectively monitor these indicators.**

While it is accepted that this may be difficult it is not impossible. Given the importance of ensuring that the Development Strategy, which underpins the Plan, is achieving its objectives it is vital that it has a robust monitoring methodology.