

Objection to 25/01467/OUT - Land to the north of London Road, Great Glen

The application site is one of several that are seeking to be included in adopted Local Plans in the area around Oadby, Great Glen and Stoughton.

To be 'Sound' these Plans will need to demonstrate that they have been Positively Prepared, are Justified and Effective. Effective means they have to be deliverable over the Plan period based on effective joint working on cross-boundary strategic matters and evidenced by a Statement of Common Ground. Positively Prepared means the development is consistent with achieving sustainable development. Justified requires an appropriate strategy based on evidence.

It is becoming evermore clear that there is no deliverable transport strategy for the growth aspirations which were outlined in the non-statutory Leicester & Leicestershire Strategic Growth Plan (SGP). The County Council, influenced by Midlands Connect, the Leicester & Leicestershire Local Enterprise Partnership (LEEP), and their various 'stakeholders', produced the SGP in January 2019, with minimal consultation, no regard for climate change and no regard for its deliverability. The LLEP role was scrapped in April 2024 with its functions transferring to the City and County Councils.

The intention of those that produced the SGP was that the LPAs in Leicestershire were supposed to reflect the SGP aspirations in their Local Plans. While there has been some agreement between the LPAs on the distribution of housing between the areas they are in a difficult position as there was never any realistic prospect of the transport vision in the SGP being delivered. Any prospect of a Statement of Common Ground has disappeared and so has the prospect of any Local Plan being able to claim it is Sound. That will be a matter for Local Plan Inspectors to consider having regard to any evidence to the contrary.

Leicestershire County Council is heavily conflicted as it is the Local Highway Authority and the lead authority for strategic growth and the opaque Freeport. The County Council has sought to increase pressure on LPAs to obtain more funding for roads and education to the detriment of the vital essentials which produce satisfactory and sustainable development. Sustainable development seeks to protect the environment and improve safety and the quality of life for future generations.

Most developer funding for infrastructure in Leicestershire has been sought through Section 106 Agreements because all the Leicestershire LPAs decided not to introduce the Community Infrastructure Levy (CIL). This is based on a charge per square metre, which was devised for that purpose and has been available since 2010. When deciding CIL rates the Regulations require an authority to strike a balance between additional investment to support development and the potential effect on the viability of developments. There is a growing problem with Viability Assessments being used to reduce or avoid developer funding, even for that which had been agreed previously. Particular problems relate to Planning Policy Guidance, Existing Use Values, unrealistic and inappropriate infrastructure assessments and the ability to make very significant profits from the extraction of Land Value Gain through the planning process.

The non-Statutory Strategic Growth Plan January 2019

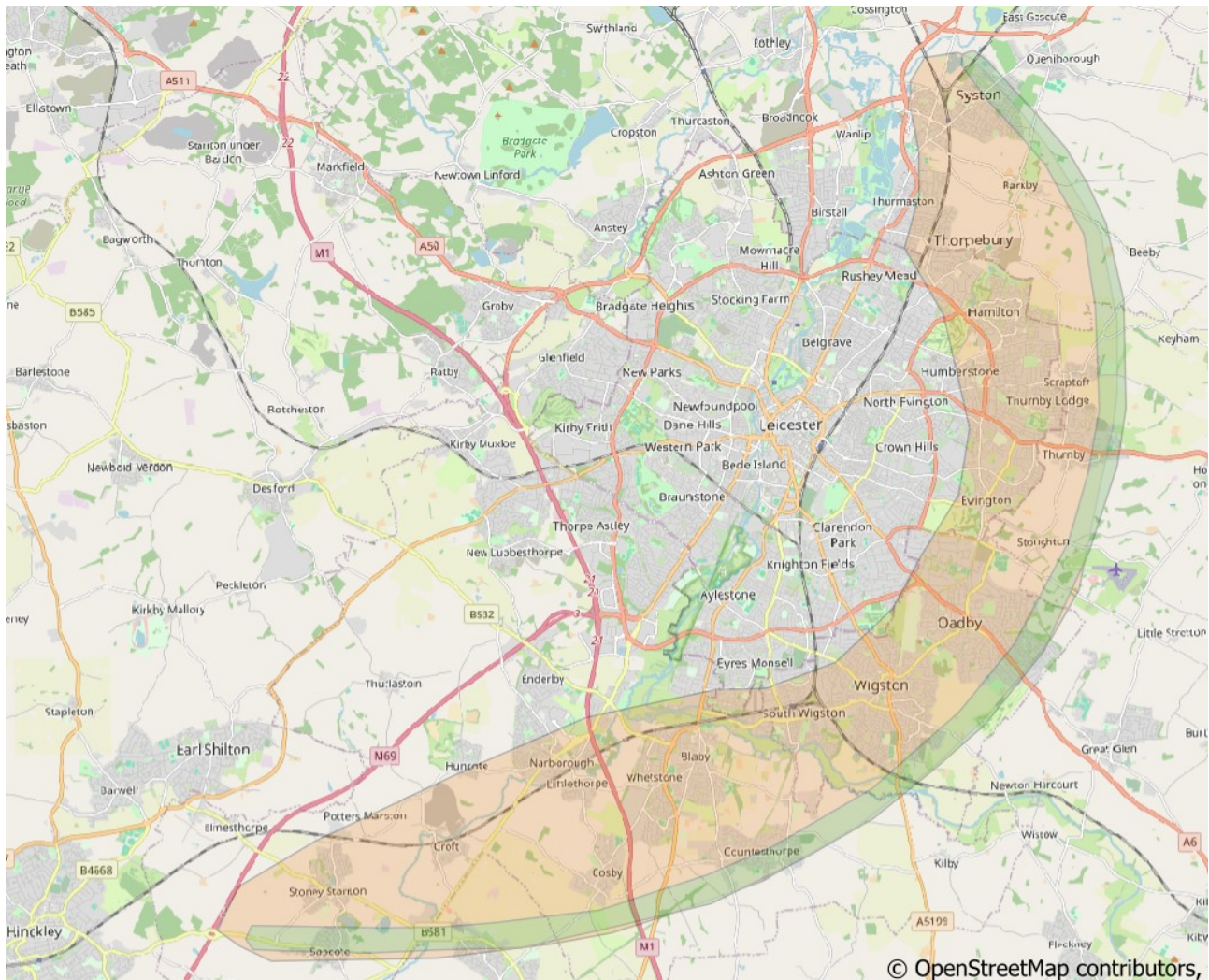
Key features of the SGP were shown in diagrammatic form in SGP Fig 7. That included three Expressway proposals. Two of these broadly followed the A5 and M42/A42 strategic roads. The third was for an entirely new route from the M69, near Hinckley to the A46 north of Leicester, passing around the south and east of Leicester, called the A46 Expressway. It included a new junction (20a) on the M1 which has not been agreed with DfT / National Highways.

The constraints, difficulties and cost of providing these three Expressways did not appear to have been considered and no routes were identified or safeguarded. An A46

Expressway would need to be at least 40km long and could be expected to cost in excess of £2.5bn at 2019 prices.

The SGP proposed providing for an additional 90,500 houses over the period 2031 to 2050. SGP Table B shows that an 'A46 Priority Growth Corridor' (PGC), inside the A46 Expressway, would have the potential to accommodate 38,000 new homes by 2050.

Proposals for A46 Expressway (green) and PGC (brown) shown in SGP Fig7 superimposed on a real map



It is readily apparent from a real map that the PGC to the east of the M1 is already highly developed. Furthermore, most of the undeveloped areas have been approved for development. Thorpebury is the largest of these and construction has started. There is a patchwork of other proposals filling in areas around settlements such as Cosby, Blaby, Countesthorpe, Oadby, Wigston, Scraptoft, Syston and Queniborough. These add many more constraints to the delivery of an A46 Expressway and it was evident that there had been no consideration of how it could connect to the A46 at its northern end.

The diagrammatic SGP Fig. 7 showed the A46 Expressway running along the outside of the PGC on an alignment that goes through numerous developed areas which means it would have to go somewhere else. No attempt has ever been made to propose a route that could be safeguarded.

The SGP said that strategic and other road and rail projects would be needed to cater for the proposed growth in addition to the three proposed Expressways. A report by Jacobs for

the SGP in March 2018 forecast a massive 309% increase in delay between 2031 and 2051 in the SE Leicester sector (Fig 12). This was said to be related to growth linked to the Expressway.

https://www.l1strategicgrowthplan.org.uk/wp-content/documents/pdf_document/evidence_base/SGP_Strategic-Assessment-of-Transport-Impacts_v5.pdf

In September 2020 Midlands Connect told the ten SGP 'partners' that there was no case for an A46 Expressway as a strategic route. That meant there could be no possibility of Government funding and it should have been immediately apparent to the partners that an orbital route, even to a lower standard, was not deliverable.

The publication of **DfT Circular 1/2022** in December 2022 brought additional clarity to the funding and delivery expectations of Government and the need for sustainable development.

<https://assets.publishing.service.gov.uk/media/681a1c42a8cdfb0ccdb8e0cc/strategic-road-network-delivery-sustainable-development.pdf>

This placed much greater emphasis on the need to reduce traffic and seek modal shift through improving opportunities for walking a cycling and public transport. Unfortunately, these aspirations have not been supported through funding or essential changes to planning and transport policies and scheme assessment.

Traffic Modelling

Traffic modelling has been seen by the LHA (Leics CC) as a necessity to evaluate transport options in Leicestershire. The modelling process relies on numerous assumptions about where people travel from and to, and the options and constraints that affect journey times and routes. None of these assumptions have been revealed. The processing within the model can also be influenced by other factors which have also not been revealed. The lack of transparency totally undermines the credibility of the modelling process.

There are also concerns about how the model's output in terms of flows and capacity is being interpreted and used. Delays are highly affected by the ratio between flow (volume V) and capacity (C) because a ratio of V/C (or VoC) of 0.85 relates to a junction with no persistent delays while an increase of the ratio by just 10% relates to a junction with very high and more persistent delays. That means traffic will increasingly seek alternative routes, where these are available and that has knock-on effects to other junctions.

The identification of junctions with a significant increase in VoC ratios has been used select them for further analysis. That means that where junctions already have high delays the model should not forecast a significant increase in VoC. Equally where alterations are proposed to increase the capacity of a junction there is a high probability that traffic which was expected to divert to other routes will revert to achieve an overall balance. That means that any perceived gains in capacity will have limited value and flows will be constrained somewhere else.

Transport Planners have recognised for decades that building more roads is self-defeating because it facilitates more car-dependent development and traffic growth which outstrips any prospect of increasing road capacity to match. Using a model based on assumptions that growth will continue following historic trends and seeking to provide for that growth is called predict and provide.

The SGP was based on this concept but without recognising the constraints preventing the provide part. It is now widely recognised that we need to use a vision-led 'decide and provide' process where the vision recognises the constraints and seeks to ensure the delivery of sustainable development. This was finally recognised in NPPF Dec 2024.

Unfortunately, NPPF itself still fails to recognise how it compromises that objective because its is so vague, ambiguous and conflicting. It also fails to recognise delivery and funding issues, especially related to Viability.

Leics CC has poured £millions into traffic modelling in the belief that it is necessary to seek government funding for road schemes. The process of producing a business case for government funding of transport projects can be a very high proportion of the scheme cost.

There is an emerging sign that some LPAs in Leicestershire are considering a vision-led approach having regard to NPPF and DfT Circular 1/2022. This will provide a challenge to the predict and provide approach of the SGP.

Leicestershire County Council observations on Local Plans

a) Blaby Local Plan 23 March 2021

<https://democracy.leics.gov.uk/documents/s160559/Blaby%20New%20Local%20Plan.pdf>

Leics CC claimed that an ongoing commitment from all authorities to the non-statutory SGP was crucial; as is their support for a collaborative and coordinated approach to the defining and allocating the funding of infrastructure funding requirements of local plans.

(53)

It said the emerging LP would would require significant infrastructure.(57) It did not identify or quantify the cost of that infrastructure.

It said it would need to protect a potential new southern route around Leicester to open up housing growth as set out in the SGP.(57) (Note this was after Midlands Connect had said such a route could not be justified as a strategic route.)

It referred to a need for this to be supported by robust transport evidence including the need to make the case for a new M1 Junction 20a (58) and safeguard land as necessary.

It sought to the inclusion of an overarching policy in the Local Plan that prioritised developer contributions towards infrastructure, most notably education and transport above others.(64)

(Note. Melton BC adopted such a policy which has since become controversial.)

It sought policies for individual sites to make sure infrastructure and housing is affordable and deliverable and sought policies that made explicit reference to the need to secure funding and where appropriate, land to deliver infrastructure. (65).

It claimed the impact on the environment was a key consideration in all planning decisions while proposing a transport strategy that ignored such considerations. (76).

b) Oadby and Wigston Local Plan Consultation 26th October 2021

<https://democracy.leics.gov.uk/documents/s164257/Response%20to%20the%20Oadby%20and%20Wigston%20Borough%20Council%20New%20Local%20Plan%20Issues%20and%20Options%20Consultation.pdf>

Leics CC referred to the Duty to Co-operate being key to the success of the SGP and the need for an ongoing commitment from all the LPAs. (31)

It recognised the transport interactions of growth in and around Oadby & Wigston and the wider implications of the SGP PGC (38). There was a reference to carbon reduction, sustainable locations, public transport and walking and cycling (41-44).

It claimed that traffic conditions would benefit from the delivery of new road around the south and east of Leicester that was required to open up development in the SGP PGC but ignored the existing and proposed developments that ruled out a road through the Borough (71).

c) **Harborough Local Plan Reg 19 18th March 2025**

<https://democracy.leics.gov.uk/documents/s189160/Cabinet%20Report%20-%20Harborough%20Reg%2019%20Local%20Plan%20March%202025.pdf>

LeicsCC Cabinet decided to object to the Harborough Local Plan. **A notable part of the decision was that this was the first time that LeicsCC, as LTA, has said that it considered that a Local Plan failed to meet the NPPF test of Soundness.** This related to both its Effectiveness and Consistency with national policy. (35)

It claimed the Harborough LP had a key role to play in 'pivoting' the Leicester & Leics HMA towards the spatial vision in the SGP proposing to bring forward growth in the PGC. (40) It did not acknowledge that development in Thurnby and Scraftoft had already taken place, with more planned, on the A46 Expressway alignment that had been shown in SGP Fig 7.

It said the LP pays only cursory reference to the SGP. It also said there was nothing to ensure that developers bring forward the growth proposed on the edge of Oadby in a way that would enable the PGC's wider development, let alone safeguard against the prospect of growth being delivered in such a way as to 'fetter or frustrate' the PGC's delivery from a transport perspective. (41)

Having said that that issue might fail without the LP tests of Soundness because the SGP is a non-statutory document it sought to argue that this should be a concern to 'partners' across the wider HMA because it could compromise the delivery of future growth in the PGC and undermine its delivery. (42)

It argued that no transport modelling of the LP's proposed spatial strategy had been undertaken although it accepted that testing had taken place as part of work looking at growth across the south of Leicestershire. (44)

It said 'evidence' serves to highlight the lack of suitable orbital transport links around south and east Leicester. This does not require evidence as all routes are country lanes or pass through villages. It said it was important that the LP did not 'fetter or frustrate' the delivery of the strategic, multi-modal transport measures it claimed were required to address this issue. (47) This appears to be a reference to the inclusion of something like the A46 Expressway in the 2023 Transport Assessment Stage 1 see below. (Referred to in Annex D and H as scheme B2).

It said that the LTA was not yet in a position to reach a view on the extent to which the LP as drafted may or may not 'fetter/frustrate' any package's delivery. (48)

The LTA considers that this is an issue of the LP's evidence base not being sufficiently mature which raises questions as the the LP's Soundness. (49)

However Harborough is not unique in this respect. A more pertinent question relates to the SGP and the failure to demonstrate a credible and viable transport strategy, or be in a position to agree a Statement of Common Ground between all partners on such a vital topic.

It also a symptom of the gulf between national planning policy and and transport policy (there is no National Transport Strategy) in terms of being able to produce a viable and credible transport strategy which supports planning and transport objectives.

It is effectively impossible to show that a Local Plan will be effective and consistent with national policy for sustainable development if it has been prepared in the absence of a credible transport vision. A significant factor has been the development and promotion of the SGP, which assumed major transport schemes could be delivered without considering the implications, constraints and funding issues.

d) Charnwood Local Plan 15th July 2025

This mainly concerned a Main Modification to include a reference to the proposed development of a CIL for the Borough. This had arisen because the LHA considered it could not rely on the Borough Council seeking Section 106 Agreements.

<https://democracy.leics.gov.uk/documents/s190741/FINAL%20Cabinet%20Report%20-%20Charnwood%20Main%20Mods%20-%20June%202025.pdf>

The report noted the risks and concerns with respect to the preparation and implementation of the proposed CIL. It recognised that the substantial number of sites allocated in the emerging Local Plan that had been (or could be in the near future) granted planning permission without contributing to the delivery of the identified highways and transport measures. This was due to the lack of an agreed mechanism to secure strategic contributions and it was claimed it would have the potential to undermine the delivery of the necessary infrastructure over the life of the Local Plan.

The Main Modification noted that in view of the availability of funding compared with the total cost of infrastructure it was likely that it would be necessary to prioritise the allocation of development contributions to different kinds of infrastructure via the preparation of Planning Obligations. (As noted above in the discussion of Blaby LP, the option chosen by Melton BC was to prioritise highways and education above everything else.)

It should be noted that the LP's proposed Transport Strategy and the Infrastructure Schedule were withdrawn at the commencement of the Charnwood LP Examination in June 2022. That included several SRN projects on the M1 and A46 trunk road, which National Highways had proposed several years previously, but where the prospect of these being delivered had disappeared.

It was replaced by a concept of three Transport Strategy Areas with a supposed priority for active travel and public transport, but nothing was identified. It did however include a list of ten road projects to tackle perceived problem junctions. The subsequent identification of the road schemes largely relied on an opaque traffic modelling process. The actual schemes proposed were identified with considerable haste using unknown information regarding their effectiveness and deliverability and were accompanied by rough cost estimates. It remains to be demonstrated whether these could be funded or delivered but an examination of the proposals suggests the benefits are illusory or greatly exaggerated.

Strategic Transport Assessment (STA) Stage 1 November 2023

This report was produced by Leics CC for the SGP Partnership two years after it should have become clear that the SGP proposals were not tenable or deliverable.

<http://www.lstrategicgrowthplan.org.uk/wp-content/uploads/2024/05/Leicester-and-Leicestershire-Strategic-Transport-Assessment-Stage-1-Main-Report-V4.0-Final-with-Appendix.pdf>

The alleged purpose of this report was to compare the growth strategy proposed in the SGP (which it called Option 2) with three alternative distribution scenarios. This showed that the Partnership continued to maintain its vision for major strategic roads. It was intended that Stage 2 of the STA would commence once a preferred HMA-wide growth strategy had been identified by the Partnership. As of now, no announcement has been made regarding a preferred HMA-wide growth strategy, nor the publication of a STA Stage 2 assessment.

Option 2 (the SGP) included 15 uncoded major road projects, including five on the SRN. It claimed these were needed to support the SGP development option. Many of these seem

to have been included without any more consideration of the constraints, costs or deliverability.

This may be because some LPAs have come to realise the problems with the growth proposed in the SGP and have chosen to splatter development across their areas with little regard for an appropriate and deliverable transport strategy or the need to identify sustainable locations for housing or employment. The majority of the Leics LPs now seem to be in limbo, with several stating that they are awaiting traffic modelling to clarify things.

Most are seeking to produce a Reg19 submission in 2026 to meet an MHCLG deadline.

The Inspectors of the Charnwood LP, where the Examination commenced in June 2022, are still deliberating over many issues, including viability, funding, transport strategy and deliverability. Charnwood was the first, and so far only Leics LPA, to decide to explore the introduction of a CIL. It is not yet clear how much its CIL proposal could contribute towards infrastructure or when it might come into operation.

Conclusion

Application 25/01467/OUT - Land to the north of London Road, Great Glen needs to have regard for the lack of a transport strategy for the area and the lack of any clarity regarding development to the south and east of Leicester without a deliverable and sustainable solution for transport and development.

The LTA is still trying to pursue a major roads based strategy as envisaged in the SGP to support the PGC which is largely developed. It has never considered the constraints to delivering an orbital route like the A46 Expressway and it has never attempted to identify any land to be safeguarded. Rather late in the day it has decided that the Harborough LP might 'fetter or frustrate' its obsolete and undeliverable SGP.

It is time to adopt a vision-led approach and deliver truly sustainable development.
Application 25/01467/OUT - Land to the north of London Road, Great Glen is not sustainable development.

CPRE Leicestershire

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