

**Charnwood Local Plan Examination**  
Inspectors - Mrs S Housden BA (Hons) BPI MRTPI &  
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Programme Officer – Mr Ian Kemp  
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Mr R Bennett  
Head of Planning and Regeneration  
Charnwood Borough Council  
Southfield Road  
Loughborough  
Leicestershire  
LE11 2TX

22 March 2024

Dear Mr Bennett,

**Charnwood Local Plan Examination**

We would like to thank the Council, Mr Kemp and the staff at Loughborough Town Hall for the efficient and effective arrangements made to host the Examination hearing in February 2024, and for the work undertaken in response to the representations that were submitted during the Examination consultation in October and November 2023.

The purpose of our letter is to highlight the key matters that arose at February's hearing in relation to the Plan's soundness, and which will need to be addressed through main modifications to the Plan. These points will be incorporated into our Week 6 Follow Up List, and are as follows:

1. The change to the definition of Gypsies and Travellers in Annex 1 of the Planning Policy for Traveller Sites (December 2023) was covered at the start of the hearing session held on 20 February 2024. The Council should confirm its position, as explained at the hearing, that the change does not have any implications for the assessment of need undertaken as part of the Leicester City and Leicestershire Gypsy, Traveller and Travelling Showpeople's Accommodation Assessment (EB-HSG-4).
2. The Sustainability Appraisal (SA) Addendum (Exam 57a) assessed three options to ensure that the reasonable alternatives for the development strategy to deliver Charnwood's apportionment of Leicester's unmet need have been tested. At the hearing, the

Council explained how the sites assessed under Option 2 were identified, and we require this to be confirmed in a note to be submitted to the Examination. The SA of the main modifications should incorporate the contents of this note, so that it is clear how the sites subject to appraisal as part of the SA of Option 2 were identified.

3. The requirement in Policy H2 as submitted, that an appropriate proportion of affordable homes should meet the M4(3) standard, is not justified by the evidence of housing need as required by the Planning Practice Guidance, and the impact on viability has not been tested. Unless the Council intends to provide the necessary evidence, including viability testing, a main modification is necessary to delete that requirement from Policy H2. We will liaise with the Council on the detailed wording of that main modification in due course.
4. In advance of the Matter 7 hearing session, the Council updated the housing land supply information in the suite of documents in Exam 58 to the end date of 31.12.23. Although representors had an opportunity to provide comments on the updated information at the Matter 7 hearing sessions, it has not been possible for representors to submit comments in writing.

As the end of the 2023/24 monitoring year is now imminent, the Council should update the information in the Exam 58 suite of documents to reflect completions and commitments as at 31.3.24. The updated documents should be made available for consultation alongside the consultation on the main modifications to the Plan.

5. There was discussion at the hearing session under Matter 8 on 21 February 2024 around whether the Council would be seeking to produce a Supplementary Planning Document (SPD) or a Development Plan Document (DPD) as the basis for securing developer contributions. In the absence of a Community Infrastructure Levy (CIL), the mechanism for securing developer contributions to transport infrastructure needs to be clear and secure. We would ask the Council to provide clarification on and justification for its preferred approach. However, it is our view that the most secure way to achieve the desired outcome would be through a DPD.
6. Policy INF1 is subject to a main modification (Main8.d). Following evidence from Leicestershire County Council at the session on Matter 9 on 22 February 2024, a further change is necessary to ensure that the policy and supporting text seek to secure developer contributions that reflect the priorities for infrastructure.

After the points above have been addressed, the Examination of the Plan should progress to the formal consultation on the proposed main modifications. As you are aware, some of the main modifications will require further corresponding changes to the Policies Map. In the interests of clarity and fairness, changes to the geographic illustration of policies on the Policies Map should be consulted on alongside the main modifications.

We will prepare a Follow Up list for Week 6 and liaise with the Council via the Programme Officer to progress with the detailed wording of the proposed main modifications that will be subject to public consultation.

Please let us know via Mr Kemp if there are any queries at this stage. We are not seeking the views of representors or any other parties on the contents of this letter. This letter should be placed on the Examination website.

Yours sincerely

*Sarah Housden and Hayden Baugh Jones*

INSPECTORS