

## **Charnwood Local Plan Core Strategy Examination Matters and Issues identified by the Inspector**

**N.B. The duty to co-operate and soundness in terms of overall provision for housing were considered at the initial hearing sessions in March 2014. The Inspector has concluded that the Council has complied with the duty to co-operate (Matter 1). Along with other matters, overall provision for housing (Matter 2) is to be given further consideration in light of the suspension of the examination and further work undertaken by the Leicester and Leicestershire authorities.**

### **Matter 2 – Overall provision for housing**

#### **Issue**

Whether the Core Strategy has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the overall provision for housing.

#### **Questions**

- 1) What is the full objectively assessed need (OAN) for housing in the Housing Market Area (HMA)?
- 2) Does the Leicester and Leicestershire Strategic Housing Market Assessment 2014 (the 2014 SHMA) provide a robust evidence base for OAN? What factors were taken into account in the 2014 SHMA and is the methodology appropriate?
- 3) What assumptions were used in the 2014 SHMA, what is the basis for these and are they appropriate and justified? Specifically what are the assumptions in relation to population change, migration, unattributable population change, household formation rates, employment and economic growth and how do these affect OAN?
- 4) Taking the DCLG household projections as a starting point, how have these been adjusted to take account of factors such as the need for affordable housing, market signals and economic projections? Is the approach set out in the 2014 SHMA appropriate? Should other factors be taken into account?
- 5) How does the OAN for the HMA relate to figures for individual authorities? What is the basis for the individual figures and how do they take account of the interrelationships between authorities?
- 6) Specifically what is the basis for the figure for OAN in Charnwood? What particular factors were taken into account?
- 7) Should the figure for OAN in the HMA or Charnwood be increased or decreased? If so to what level and on what basis?
- 8) Will there be unmet needs from authorities within the HMA? What is the evidence on this issue and is it robust?
- 9) To what extent have the authorities in the HMA reached agreement over the identification of OAN and how this will be met? Are the individual authorities committed to meeting the identified needs?
- 10) Is the level of housing planned in the Charnwood Core Strategy sufficient to meet OAN? Should the plan period be amended to correspond to the time period covered by the 2014 SHMA i.e. start in 2011? Should it look ahead to 2031 or 2036?

<b>Matter 3 – Employment and Economic Development</b>
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**Issue**

Whether the Core Strategy has been positively prepared and whether it is justified, effective and consistent with national policy in relation to employment and economic development.

**Questions**

- 1) What is the basis for the overall amount of employment land planned in the Borough? Is this justified? Is it realistic, how does it compare with past take up rates?
- 2) What options were considered and why was this figure chosen?
- 3) How does this relate to existing commitments and development completed to date within the plan period?
- 4) How does it relate to overall jobs targets?
- 5) What is the relationship between overall housing and employment land provision?
- 6) What is the relationship between proposals at the Science and Enterprise Park and wider employment land needs?
- 7) In overall terms is Policy CS6 justified, effective and consistent with national policy?

## **Matter 4 – The Development Strategy**

### **Issue**

Whether the Development Strategy set out in Policy CS1 is justified, effective and consistent with national policy.

**N.B. Detailed issues relating specifically to the proposed Sustainable Urban Extensions and Directions of Growth are dealt with under other Matters**

### **Questions**

- 1) What is the basis for the proposed distribution of development between different parts of the Borough i.e. the Principal Urban Area, Loughborough and Shepshed, the Service Centres and other settlements?
- 2) What options were considered for the distribution of development? Why was this option chosen and why were alternative options discounted?
- 3) What is the basis for the settlement hierarchy set out in Policy CS1? Is it appropriate and justified?
- 4) Is the approach to the scale of development in different parts of the Borough appropriate and justified?
- 5) Is Policy CS1 sufficiently clear in terms of the scale of development in individual Service Centres, other settlements and small villages and hamlets?

**Matter 5 – The supply and delivery of housing land**

**Issue**

Whether the approach towards the supply and delivery of housing land is justified, effective and consistent with national policy.

**Questions**

- 1) What is the up to date situation regarding completions to date in the plan period and what is the residual amount of housing that needs to be delivered?
- 2) What is the potential total supply of new housing? What is the basis for this figure and is it justified? How much of this would be consistent with policies in the Core Strategy? How much would be developable within the plan period? How does total potential supply compare with the planned level of provision?
- 3) What is the estimated total supply in the plan period from
  - a) existing planning permissions
  - b) each of the Sustainable Urban Extensions and Directions of Growth
  - c) sites within the urban areas
  - d) Service Centres
  - e) Elsewhere?
- 4) What are the assumptions about the scale and timing of supply and rates of delivery from these various sources? Are these realistic? Has there been any discounting of sites with planning permission for example?
- 5) How has flexibility been provided in terms of the supply of housing? Is there a stock of potential sites identified within the SHLAA that could deliver housing?
- 6) Has there been persistent under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 47 of the NPPF? What would the requirement be for a five year supply including a buffer?
- 7) Would the Core Strategy realistically provide for a five year supply on adoption? Will a five year supply be maintained?
- 8) In overall terms would the Core Strategy realistically deliver the number of dwellings required over the plan period?

**Matter 6 – Strategic housing needs and affordable housing**

**Issue**

Whether the approach towards strategic housing needs and affordable housing in Policy CS3 is justified, effective and consistent with national policy.

**Questions**

- 1) What is the evidence in relation to the need for affordable housing? What does this show?
- 2) What is the evidence in relation to the viability of delivering affordable housing as part of market housing schemes?
- 3) What is the basis for the site size thresholds and why are different thresholds applied to urban areas and Service Centres compared with rural locations?
- 4) What is the basis for the percentage targets? Why are different targets applied to different areas/settlements?
- 5) Is the approach to seeking affordable housing provision justified?
- 6) Is there sufficient flexibility and is sufficient account taken of the potential effect on viability?
- 7) In other respects is Policy CS3 justified, effective and consistent with national policy?

<b>Matter 7 – Gypsies, Travellers and Travelling Showpeople</b>
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**Issue**

Whether the approach towards Gypsies, Travellers and Travelling Showpeople in Policy CS5 is justified, effective and consistent with national policy.

**Questions**

- 1) What is the evidence in relation to the need for accommodation for Gypsies, Travellers and Travelling Showpeople? What does this show?
- 2) Does Policy CS5 reflect the evidence and provide a clear basis to meet these needs?
- 3) Is the approach towards the provision of permanent pitches and showpeople plots at the Sustainable Urban Extensions and Directions of Growth appropriate and justified?
- 4) Are the criteria for assessing new sites sufficiently clear? Are they appropriate and justified?
- 5) In overall terms is the approach set out in Policy CS5 justified, effective and consistent with national policy?

<b>Matter 8 – Town Centres and shops</b>
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**Issue**

Whether the approach towards Town Centres and shops in Policy CS9 is justified, effective and consistent with national policy.

**Questions**

- 1) What is the evidence in terms of the need for additional floorspace for retailing and other main town centre uses?
- 2) How will this need be met, when and where? Is this sufficiently clear?
- 3) What is the basis for the hierarchy of centres? Is this justified?
- 4) What is the basis for the approach to retail development in Loughborough Town Centre and in particular the directions for growth? Is the approach justified?
- 5) What is the basis for the thresholds for requiring retail impact assessments? Are these justified?
- 6) What is the status of Thurmaston Retail Park in relation to centres? Is the approach justified and consistent with national policy?
- 7) Overall, is the approach to town centres and shops in Policy CS9 effective, justified and consistent with national policy? Does it fully reflect the sequential approach set out in the NPPF?

**Matter 9 – North East of Leicester Sustainable Urban Extension**

**Issue**

Whether the Sustainable Urban Extension (SUE) North East of Leicester proposed in Policy CS19 is justified, effective and consistent with national policy.

**Questions**

- 1) Is a SUE in South Charnwood justified in principle? What are the realistic options in terms of an overall strategy for accommodating the level of growth planned?
- 2) Why was the option of a SUE chosen? What benefits does such an approach have compared with for example development within existing settlements or a number of smaller urban extensions?
- 3) What options for the location of the SUE in South Charnwood were considered? Why was this location chosen and others discounted? Is it the most appropriate option for a SUE?
- 4) What is the basis for the particular level of housing development planned?
- 5) What is the basis for the amount of employment land planned?
- 6) Is the boundary of the SUE appropriate and justified? What is the basis for it?
- 7) What are the requirements and costs in terms of additional and improved infrastructure such as transport and social and community facilities?
- 8) How will infrastructure be provided and funded? How will it be phased in relation to the development? What mechanisms will be in place to ensure necessary infrastructure is in place at the right time?
- 9) What are the potential adverse impacts of the proposed SUE in terms of
  - Traffic/transport
  - Landscape and countryside
  - Nearby settlements
  - The historic environment
  - Wildlife/biodiversity
  - Flood risk
  - Other issues
- 10) How could these be addressed/mitigated?  
**N.B. The Council should address issues raised in representations in its statement**
- 11) Are the specific requirements set out in Policy CS19 appropriate and justified? In particular those relating to affordable housing, Gypsy and Traveller and Travelling Showpeople accommodation, retail development and open space/sports facilities?
- 12) Is the proposed SUE deliverable? What evidence is there in terms of viability and deliverability?
- 13) Are there any significant physical or other constraints to development such as land ownership?
- 14) What is the expected timescale for development? What are the assumptions regarding the start and rate of housing completions? Are these realistic?
- 15) What would be the implications of development being delayed or progressing at a slower rate? Is there flexibility within the Core Strategy to deal with this? To what extent could other sites be brought forward?

## Matter 10 – North of Birstall Direction of Growth

### Issue

Whether the North of Birstall Direction of Growth proposed in Policy CS20 is justified, effective and consistent with national policy.

### Questions

- 1) Is a direction of growth in South Charnwood justified in principle? What are the realistic options in terms of an overall strategy for accommodating the level of growth planned?
- 2) Why was the option of a direction of growth chosen? What benefits does such an approach have compared with for example development within existing settlements or a number of smaller urban extensions?
- 3) What options for the location of the Direction of Growth in South Charnwood were considered? Why was this location chosen and others discounted? Is it the most appropriate option for a direction of growth?
- 4) Why is it a direction of growth rather than an allocation for a SUE? Is this approach justified?
- 5) What is the basis for the particular level of housing development planned?
- 6) What is the basis for the amount of employment land planned?
- 7) What are the requirements and costs in terms of additional and improved infrastructure such as transport and social and community facilities?
- 8) How will infrastructure be provided and funded? How will it be phased in relation to the development? What mechanisms will be in place to ensure necessary infrastructure is in place at the right time?
- 9) What are the potential adverse impacts of the proposed Direction of Growth in terms of
  - Traffic/transport
  - Landscape and countryside
  - Nearby settlements
  - The historic environment
  - Wildlife/biodiversity
  - Flood risk
  - Other issues
- 10) How could these be addressed/mitigated?  
**N.B. The Council should address issues raised in representations in its statement**
- 11) Are the specific requirements set out in Policy CS20 appropriate and justified? In particular those relating to affordable housing, Travelling Showpeople accommodation and retail development?
- 12) Is the proposed Direction of Growth deliverable? What evidence is there in terms of viability and deliverability?
- 13) Are there any significant physical or other constraints to development such as land ownership?
- 14) What is the expected timescale for development? What are the assumptions regarding the start and rate of housing completions? Are these realistic?
- 15) What would be the implications of development being delayed or progressing at a slower rate? Is there flexibility within the Core Strategy to deal with this? To what extent could other sites be brought forward?

**Matter 11 – Watermead Regeneration Corridor Direction of Growth**

**Issue**

Whether the Watermead Regeneration Corridor Direction of Growth proposed in Policy CS21 is justified, effective and consistent with national policy.

**Questions**

- 1) What is the intention of the proposed Direction of Growth? What are the key objectives?
- 2) What type and scale of development is envisaged? Is this clear?
- 3) What is the basis for the amount of office space and employment land proposed? Is this justified?
- 4) Is the approach to the location of main town centre uses (office, hotel and leisure) consistent with national policy? What is the justification for proposing such uses in this location?
- 5) What are the potential constraints to development and how would these be overcome?
- 6) What are the potential adverse impacts and how would these be overcome?
- 7) Is the proposal realistically deliverable?

**Matter 12 – West of Loughborough Sustainable Urban Extension**

**Issue**

Whether the West of Loughborough Sustainable Urban Extension (SUE) proposed in Policy CS22 is justified, effective and consistent with national policy.

**Questions**

- 1) Is a SUE in North Charnwood justified in principle? What are the realistic options in terms of an overall strategy for accommodating the level of growth planned?
- 2) Why was the option of a SUE chosen? What benefits does such an approach have compared with for example development within existing settlements or a number of smaller urban extensions?
- 3) What options for the location of the SUE in North Charnwood were considered? Why was this location chosen and others discounted? Is it the most appropriate option for a SUE?
- 4) What is the basis for the particular level of housing development planned?
- 5) What is the basis for the amount of employment land planned?
- 6) Is the boundary of the SUE appropriate and justified? What is the basis for it?
- 7) What are the requirements and costs in terms of additional and improved infrastructure such as transport, social and community facilities and restoration/management at Garendon Park and Garden?
- 8) How will infrastructure be provided and funded? How will it be phased in relation to the development? What mechanisms will be in place to ensure necessary infrastructure is in place at the right time?
- 9) What are the potential adverse impacts of the proposed SUE in terms of
  - Traffic/transport
  - Landscape and countryside
  - Nearby settlements
  - Wildlife/biodiversity
  - Flood risk
  - Other issues
- 10) How could these be addressed/mitigated?
- 11) What are the potential effects on heritage assets and their settings at Garendon Park and Garden? Specifically how would they be affected by proximity of development, new road infrastructure and public access? Would there be substantial harm and if so are there factors that outweigh the harm? In overall terms is the proposal consistent with the NPPF in respect of heritage assets and their settings?

**N.B. The Council should address issues raised in representations in its statement. In response to Q11 a comprehensive response to concerns raised by English Heritage should be given.**

- 11) Are the specific requirements set out in Policy CS22 appropriate and justified? In particular those relating to affordable housing, Gypsy and Traveller and Travelling Showpeople accommodation, retail development and open space/sports facilities?
- 12) Is the proposed SUE deliverable? What evidence is there in terms of viability and deliverability?

Examination into the Charnwood Local Plan Core Strategy

- 13) Are there any significant physical or other constraints to development such as land ownership?
- 14) What is the expected timescale for development? What are the assumptions regarding the start and rate of housing completions? Are these realistic?
- 15) What would be the implications of development being delayed or progressing at a slower rate? Is there flexibility within the Core Strategy to deal with this? To what extent could other sites be brought forward?

**Matter 13 – Loughborough University and Science and Enterprise Park**

**Issue**

Whether the extension to the Science and Enterprise Park proposed in Policy CS23 is justified, effective and consistent with national policy.

**Questions**

- 1) What is the evidence base to justify the proposal?
- 2) What types of development are proposed? Is this sufficiently clear?
- 3) Does this include main town centre uses? If so how does this sit with the sequential approach set out in the NPPF?
- 4) What are the potential effects on the supply and delivery of employment uses elsewhere?
- 5) How will the specific nature of business uses be controlled i.e. the knowledge based sector?
- 6) Does the policy provide sufficient flexibility, particularly in terms of the floorspace in each sector?
- 7) What are the infrastructure requirements and how will they be met and funded?
- 8) What are the potential adverse impacts and how could they be mitigated?
- 9) What would be the effect on Garendon Park and Garden?

**Matter 14 – Shepshed Direction of Growth**

**Issue**

Whether the Shepshed Direction of Growth proposed in Policy CS24 is justified, effective and consistent with national policy.

**Questions**

- 1) Is a direction of growth in North Charnwood justified in principle? What are the realistic options in terms of an overall strategy for accommodating the level of growth planned?
- 2) Why was the option of a direction of growth chosen? What benefits does such an approach have compared with for example development within existing settlements or a number of smaller urban extensions?
- 3) What options for the location of the Direction of Growth in North Charnwood were considered? Why was this location chosen and others discounted? Is it the most appropriate option for a direction of growth?
- 4) Why is it a direction of growth rather than an allocation for a SUE? Is this approach justified?
- 5) Does the Core Strategy provide sufficient guidance as to the location of the Direction of Growth (see key Diagram and Diagram on Page 136)?
- 6) What is the basis for the particular level of housing development planned?
- 7) What are the requirements and costs in terms of additional and improved infrastructure such as transport and social and community facilities?
- 8) How will infrastructure be provided and funded? How will it be phased in relation to the development? What mechanisms will be in place to ensure necessary infrastructure is in place at the right time?
- 9) What are the potential adverse impacts of the proposed Direction of Growth in terms of
  - Traffic/transport
  - Landscape and countryside
  - The historic environment
  - Wildlife/biodiversity
  - Flood risk
  - Other issues
- 10) How could these be addressed/mitigated?  
**N.B. The Council should address issues raised in representations in its statement**
- 11) Are the specific requirements set out in Policy CS24 appropriate and justified? In particular those relating to affordable housing and Travelling Showpeople accommodation?
- 12) Is the proposed Direction of Growth deliverable? What evidence is there in terms of viability and deliverability?
- 13) Are there any significant physical or other constraints to development such as land ownership?
- 14) What is the expected timescale for development? What are the assumptions regarding the start and rate of housing completions? Are these realistic?
- 15) What would be the implications of development being delayed or progressing at a slower rate? Is there flexibility within the Core Strategy to deal with this? To what extent could other sites be brought forward?

**Matter 15 – Other Policies**

**Issue**

Whether other Policies are justified, effective and consistent with national policy.

**Questions**

**N.B. The following questions apply to other policies not covered by specific Matters i.e. Policies CS2, CS4, CS7, CS8, CS10-CS18, CS25 and CS26. The Council should address issues raised in representations in its statement, dealing with each policy in turn.**

- 1) What is the basis for the policy? What is it seeking to achieve?
- 2) How does the policy relate to the evidence base?
- 3) Is the policy sufficiently clear? Will it provide sufficient guidance for decision making?
- 4) How will the policy be implemented? Is this clear?
- 5) How does the policy relate to national policy? How is it consistent? Are there any inconsistencies?
- 6) In overall terms is the policy justified, effective and consistent with national policy?

**Matter 16 – Monitoring**

**Issue**

Whether the Core Strategy would be able to be monitored effectively

**Questions**

- 1) Does the Monitoring Framework in Appendix 3 set out a clear approach which will allow the implementation of each policy to be monitored effectively?
- 2) Should it set out specific indicators and targets relating to the key objectives of each policy?
- 3) Is baseline data available in some cases?

**N.B. The Council is requested to prepare a simplified monitoring framework setting out specific indicators and targets for each policy and baseline data where appropriate. In the case of overall housing provision and individual proposals, the targets should relate to the housing trajectory.**