

Charnwood Borough Council

Southfields

Loughborough

Leicestershire

LE11 2TT

C/O Mr Ian Kemp

Representation Number: 615

Representor: Mr C Green

Via Email Only: ikemp@icloud.com

12 January 2023

Dear Sir/ Madam,

CHARNWOOD LOCAL PLAN EXAMINATION FURTHER HEARING STATEMENTS

Introduction

We are submitting this representation to provide a response to the supplementary questions produced by the Inspector in relation the Charnwood Local Plan 2021-37 Examination.

This representation provides a review of the planning policy context and a response to the following matter:

Matter 1: Duty to Cooperate and Other Legal Requirements

Planning Policy Context

The following section details the relevant planning policies which have informed this representation.

Paragraph 8 of the National Planning Policy Framework (NPPF) (2021), hereinafter referred to as the NPPF, sets out three sustainability objectives which are as follows:

“a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

As detailed in paragraph 22, 'strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.'

In accordance with paragraph 35 of NPPF (2021), Local Plans must be assessed as to whether they accord with legal and procedural requirements and meet the tests of soundness as set out below:

"a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."

Supplementary Questions

The proceeding section will address the supplementary questions produced by the Inspector.

Matter 1: Duty to Cooperate and Other Legal Requirements

Issue 3 – Whether the Plan has been prepared in compliance with other legal requirements

Supplementary Question 1: Are any adjustments to the Plan period (2021-2037) necessary to accord with NPPF paragraph 22 which states that strategic policies should look ahead for a minimum 15-year period from adoption, having regard to the delays in Examination process?

We consider that adjustments to the Plan period (2021-2037) are necessary to accord with NPPF (2021) paragraph 22. The adopted Local Development Scheme (LDS) (April 2022 to March 2025) indicates that the new Local Plan should have been adopted in December 2022/ January 2023, but that target has not been met due to delays in the Examination process. Given that the hearing sessions were supposed to conclude in Summer 2022, we estimate that the examination is currently running at least 7 months behind programme. Thus, it is our view that the earliest the plan could be adopted is around July 2023. This does not however take into account any additional work required in respect of the Plan being modified to meet the identified housing need over the plan period. In light of these delays, the Plan period should be extended beyond 2037, to at least 2038, to ensure that the strategic policies contained within the plan look ahead for a minimum 15-year period from adoption. This means Charnwood will need to allocate sites to meet at least an additional year's housing supply (a minimum of another 1,189 dwellings).

An extension to the plan period is required for the plan to be consistent with national policy and enable the delivery of sustainable development. Thus, meet the test of soundness set out in paragraph 35 of the NPPF (2021).

Furthermore, it is our view that Charnwood Borough Council needs to be proactive in terms of its future growth and treat the 'minimum 15-year period' as a minimum in order to anticipate and

respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

I trust the above representation will be given due consideration during the examination process.