

For and on behalf of
Lagan Homes

**Charnwood Local Plan
Examination in Public
Matter 1: Duty to Cooperate and Other Legal Requirements**

Gorse Hill, Anstey

**Prepared by
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1.0 INTRODUCTION

- 1.1 This response to Matter 1 of the Inspectors' MIQs in respect of the Charnwood Local Plan (CLP) 2021-37 Examination has been prepared by the Strategic Planning Research Unit ('SPRU') of DLP Planning Ltd. SPRU have been instructed to appear at the Examination on behalf of Lagan Homes.
- 1.2 This hearing statement should be read alongside previous representation to the Regulation 19 consultation (PSLP/162), submitted by Geoffrey Prince Associates Ltd on behalf of Cawrey Homes, in respect of the Local Plan and should be considered in the context of support for the Local Plan. The site in which these representations related, is now being promoted by Lagan Homes.
- 1.3 Acting on behalf of our clients Lagan Homes, DLP will attend the Matter 1 Hearing Session and make further oral submissions on behalf of our client.
- 1.4 This statement outline's Lagan Homes comments in respect of Matter 1, with responses to the Inspector's MIQ's (Matter 1) set out below.
- 1.5 In order to assist the Inspectors, the contents of this submission demonstrate that the submission version Plan is capable of satisfying the legal requirements for plan-making under the Duty to Cooperate subject to either or both of the following mechanisms:
 - As a matter of soundness enabling the Examination to consider the opportunities to identify sustainable contributions towards the updated emerging position relating to the unmet housing needs of Leicester City through the provision of additional deliverable site allocations within the context of the spatial strategy as proposed particularly at Anstey and within the Leicester Urban Area
 - Subject to the above, as necessary direct Modifications to ensure the robustness of the policy approach and enforceability (in plan-making terms) of timescales required to undertake early review and updates to the Local Plan.

2.0 ISSUE 1 – WHETHER THE COUNCIL HAS COMPLIED WITH THE DUTY TO COOPERATE

1.2 What are the relevant cross boundary strategic matters that have arisen through the preparation of the Plan (defined as matters having a significant impact on at least two planning areas)?

2.1 The unmet housing and employment needs of Leicester City Council, along with the preparation of the Leicester and Leicestershire Growth Strategic Plan, including the associated infrastructure aspirations, are the key cross boundary strategic matters relating to the preparation of the Charnwood Local Plan. These matters are relevant to addressing unresolved objections regarding the Examination of the Plan.

1.2 What outcomes have resulted from engagement and cooperation on the relevant strategic matters and how have these informed the Plan’s policies, including in relation to:

- a) Housing
- b) Employment Highways and Transport
- c) Flood risk
- d) Infrastructure including renewable energy
- e) Green Infrastructure and the natural environment
- f) Site allocations with cross boundary impacts

2.1 A draft Statement of Common Ground (March 2021), which considers unmet housing need arising from Leicester, forms part of the examination library (document reference SCG/1). The Statement of Common Ground confirms a level of unmet need that needs to be addressed across the wider Leicestershire area but does not apportion a split across the constituent authorities.

2.2 An updated Statement of Common Ground (May 2022), which does not at the time of writing this statement appear within the Examination library pending its agreement by all constituent authorities, expands on the March 2021 version and apportions the unmet housing and employment needs of Leicester across the Leicestershire authorities.

2.3 As demonstrated below, Charnwood has been apportioned an annual contribution of 78 dwellings per annum under the proposed approach.

Local Planning Authority	Average Annual unmet housing need contribution 2020 to 2036 (dwellings)
Blaby District Council	346
Charnwood Borough Council	78
Harborough District Council	123
Hinkley and Bosworth Borough Council	187
Melton Borough Council	69
North West Leicestershire District Council	314
Oadby and Wigston Borough Council	52
Total	1,169

- 2.4 The District Councils across Leicestershire have agreed to this recommended strategy for the dispersal of additional dwellings to address future needs that cannot be met in Leicester. The 'Statement of Common Ground (May 2022)' has not yet been formally agreed upon by partner councils, and all councils will review it as part of their respective governance procedures.
- 2.5 Work should continue to formalise the agreement set out in the draft SoCG as soon as reasonably possible. Failure to address the unmet need at this point and simply opting to address the issue at a later date is failing to plan positively and failing the residents of Leicestershire who need a wider spectrum of attractive and affordable housing options in close proximity to Leicester. It is considered that work could reasonably be completed to address the proposed apportionment of unmet needs within the context of the ongoing Examination.
- 2.6 Two specific points are relevant in this regard:
- The Council acknowledges that since submission of the Local Plan the calculation of Local Housing Need using the standard method has increased from 1,111 to 1,156 dwellings per annum. The position taken in relation to Charnwood's component of overall housing needs in Leicestershire reflects the PPG (at ID: 2a-008-20190220) based on the date of submission of the Plan for Examination but masks worsening affordability in this part of the County, at least in part related to under-delivery against previous levels of housing need. Related to this:
 - The increase in the result of the Standard Method (+45 dwellings or +4%) comprises around 58% of the proposed apportionment of Leicester's unmet needs to Charnwood
 - Strictly applied to Policy DS2 the provisions of the PPG should anticipate that resolution of the contribution required towards Leicester's unmet needs should also be addressed within two years from submission of the CLP for Examination
 - The proposed apportionment of unmet needs can at least in-part be considered in the context of the overall provision for housing identified in Policy DS1 relative to the proposed housing requirement in the submission version Local Plan (19,461 versus 17,776 dwellings: +1,685 dwellings or a whole plan buffer of 9.5%) as follows:
 - Contributions towards Leicester's unmet needs from within this buffer for the period 2020 to 2036 as proposed ($78 * 16 \text{ years} = 1,248$ dwellings) would reduce the effective buffer to an unacceptably low 437 dwellings (2.5%) and without any regard to the deliverability or spatial distribution of any buffer.
 - However, subject to the outcomes of the Examination under Matter 7 regarding Housing Land Supply, together with ensuring a focus on the early delivery of additional sites identified to contribute towards Leicester's unmet needs, it may be possible to address the requirements under the SoCG and ensure the effectiveness of the Plan as a whole with a somewhat reduced buffer.
 - For example, the addition of Leicester's unmet needs to the housing requirement ($17,776 + 1,248 = 19,024$) may only require the allocation of around 1,000 additional dwellings to achieve a 7.5% buffer (20,450 dwellings total provision) ($19,461 - 20,450 = -989$ dwellings to be identified).
 - The implications of operating the Plan with a 'reduced' buffer in terms of implications for housing land supply and addressing other priorities (including affordable housing) could be considered under the normal arrangements and matters to be considered as part of Local Plan reviews within five years under

PPG ID: 61-065-20190723).

2.7 These points demonstrate why as far as possible the issue of addressing contributions towards Leicester's unmet needs should be addressed via the ongoing Examination.

1.3 Is the process of cooperation demonstrated with clear evidence, including Statements of Common Ground as expected by National Planning Policy Framework paragraph 27 and the Planning Practice Guidance? Do the Statements of Common Ground identify the relevant strategic matters, actions in relation to cross boundary issues, and the outcomes of actions taken?

2.8 No response.

1.4 When will the Statement of Common Ground on Housing and Employment Need (SCG-1) be updated to apportion the unmet need for housing and employment from Leicester to 2036?

2.9 Given that the indicative unmet housing need contribution for Charnwood stands at just 78 dwellings per annum it is considered that there is an opportunity for the Council to pause the Examination and seek additional land to accommodate the additional dwellings. There is recent precedent for such an approach, with Inspector Middleton, overseeing the Welwyn Hatfield Local Plan Examination, pausing proceedings and asking the Council to identify additional sustainable sites before recommencing the Examination.

2.10 The opportunity to address the unmet need through the current emerging Plan should be embraced by the Council in order to avoid an unnecessary and potentially expensive early review.

2.11 If such a pause does not take place, the Council's inclusion of a review mechanism at Policy DS2 is supported, but we recommend that specific regard is had to the approach taken by the Inspector examining the Bedford Local Plan 2030 (see response to question 1.10 under this Matter below).

1.5 What liaison has taken place between the Leicester and Leicestershire authorities to address the unmet need for housing and employment since the announcement of the cities and urban centres uplift in December 2020? Where is this documented?

2.12 No response.

1.6 Paragraph 3.25 of SCG-1 states that the Leicester & Leicestershire authorities agree that there is a sufficient supply of employment land in the Charnwood Local Plan to accommodate the unmet need for 23 hectares of employment land to 2036. However, page 96 of the Statement of Consultation (SD/13) indicates that the Plan does not accommodate unmet need for employment. What is the correct position?

2.13 No response.

1.7 If the outcome of cooperation on the Statement of Common Ground is that none of the unmet housing need will be apportioned to Charnwood, would there be any implications for the Plan or for Policy DS2?

2.14 The draft SoCG, seeks to apportion around 78 dwellings of the unmet housing need from Leicester to Charnwood, and as such the inclusion of a review policy is fundamentally supported and necessary to ensure that the Plan can be found sound.

2.15 In addition to simply seeking to address unmet housing need, the review mechanism will also ensure that progress on the Leicester and Leicestershire Strategic Growth Plan is aligned to policies within the Charnwood Local Plan. The importance of strategic alliance was recognised by the Bedford Local Plan Inspector who stated in respect of a review policy;

"18. The wording of the policy recognises the need to align strategic growth with the

delivery of planned infrastructure and refers to the aspiration of preparing a joint strategic plan in future. These are both appropriate aims and whilst we recognise that the policy cannot dictate the parameters of a future plan, we are satisfied that the wording proposed is effective and Justified”.

- 2.16 The ongoing ability of the Council to demonstrate a 5-year housing land supply post adoption of the Local Plan would also be supported by the inclusion of a review mechanism, which allows for a degree of flexibility, should some of the larger strategic allocations that make up approximately 43% of the overall supply (post adoption in the latest trajectory pending any further information to be published by the Council), deliver at a slower pace than that anticipated by the Council.
- 2.17 As is set out in the Council’s latest trajectory, the supply post adoption is expected to be marginal at best and will likely fall below 5-years by 2029. Accordingly, it is sensible to review the Plan in the immediate period post adoption to identify additional sites, should it not be considered reasonable to pause the Examination to undertake the exercise at this point.
- 2.18 Anticipating these broader components of assessing whether policies remain up-to-date and potential consequences of undertaking a review as already proposed is necessary to achieve consistency with national policy and guidance. Notably, the PPG identifies the relevance of the Duty to Cooperate in informing the scope and approach to plan reviews and how strategic priorities will be addressed going forward (PPG ID: 61-075-20190723). Ongoing activity regarding preparation of the SoCG demonstrates that this engagement process in effect remains ongoing and Policy DS2 commits the Council to addressing relevant outcomes, as required.
- 2.19 In these circumstances it would be anticipated that any further requirement for updates to the Plan triggered by the review (for example those related to addressing shortfalls in supply) would reflect the wider outcomes emerging from engagement such as the objective to focus sustainable development at locations well-related to the Leicester Urban Area. This is acknowledged as an important factor influencing the distribution of Leicester’s housing need within the emerging SoCG.
- 2.20 Given that the spatial strategy in Policy DS1 is already broadly aligned with relevant cross-boundary strategic priorities (notwithstanding it failing to maximise the capacity for growth in the LUA) there would be no significant implications for the Plan if the outcome of the review did not require a specific contribution towards unmet needs.

1.8 If the Statement of Common Ground concludes that more housing is needed in Charnwood to meet Leicester’s unmet need, does the development strategy set out in Policy DS1 represent a robust and appropriate approach for the distribution of further housing, employment and other development in the longer term?

- 2.21 Paragraph 3.24 of the March 2021 SoCG states; *“the authorities agree that Charnwood Borough Council will continue to actively engage in the programme of work to redistribute unmet need and include a trigger policy to review and update the Local Plan, if the agreed apportionment of unmet need requires it”.* This is reemphasised in the May 2022 version of the SoCG.
- 2.22 To guarantee that the Local Plan is robust and capable of supporting future contributions to Leicester’s unmet housing needs in a sustainable way, it is sensible to meet unmet needs in the locations closest to Leicester, thus reducing potential effects regarding increased commuting, travel distances and environmental impacts. Therefore, an approach that delivers growth around the Leicester Urban Area, or in settlements such as Anstey which is within close proximity of Leicester, is supported in principle.
- 2.23 Policy DS1 provides an appropriate framework to enable the identification of sites to meet

the identified and apportioned unmet housing need that should therefore be focused in these areas in the first instance. The emerging position regarding unmet needs indicates that these are capable of being most sustainably addressed within the context of the spatial strategy as proposed. This is subject to Modifications that fully emphasise and reflect the capacity for development in the Leicester Urban Area to address these needs together with specifically identifying the relationship and capacity for growth in service centres such as Anstey, which lies just outside the Leicester Urban Area.

- 2.24 The spatial strategy as proposed provides the basis to make specific additional contributions towards the strategic priority of addressing Leicester's unmet needs, at locations such as our client's site at Gorse Hill, without a fundamental change to the distribution of growth.

1.9 Are there any other issues that could trigger the need for a Plan review apart from Leicester's unmet need?

- 2.25 As is set out above, the ongoing work on the Leicester and Leicestershire Strategic Growth Plan and as a mechanism for ensuring the maintenance of a housing land supply also support the need for an effective review mechanism within the Plan.

1.10 Will Policy DS2 be effective in its submitted form and are any main modifications necessary to improve its clarity in relation to timescales and its effectiveness? Should the policy include a reference to strategic warehousing and distribution needs?

- 2.26 Notwithstanding the need to agree an approach to the unmet needs from Leicester through an updated SoCG, regard should be had to the approach taken by other Councils and Inspectors in respect of review mechanisms. In particular, we refer to the preparation of the Bedford Local Plan 2030, where through the Examination the Inspector concluded that an early review policy was required to address changes in national policy and local circumstances in that case relating to the Oxford-Cambridge 'Arc'.

- 2.27 In his report in respect of the Local Plan, the Inspectors said in respect of a review;

"17. Nevertheless, there is a need for the plan to respond appropriately to longer term requirements, and in particular the Arc, as soon as possible. Consequently, notwithstanding the statutory requirement for the plan to be reviewed, and then updated if necessary, within five years of its adoption, it is necessary for a review and update to be completed more quickly. On this basis (and for other reasons detailed elsewhere in this report), MM1 is necessary for the plan to be justified and effective. This requires a review of the plan and any update of it/new plan to be submitted for examination within three years of adoption of the current plan. Based on the discussion at the hearings the three year deadline appropriately balances the need for the plan to be reviewed and updated as quickly as possible with the realities of the time likely to be necessary for the Council to effectively undertake this work".

- 2.28 The review policy within the Bedford Local Plan 2030 (Policy 1) is robust and ensures that an appropriate timeframe for review is adhered to by the Council. The Policy reads as follows;

"The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019

The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including

the A421 expressway, Black Cat junction, East West Rail link and potentially the A1 realignment.”.

2.29 Accordingly, we do not consider that the wording as proposed in Policy DS2 is sufficient to ensure an effective review will, within a workable timeframe, be undertaken by the Council. The Council’s proposed approach includes some, but not all, of the safeguards and specific timeframes that were fully supported within the approach and specific wording of the Bedford Local Plan Review Policy (Policy 1).

2.30 In the circumstances for the emerging Plan in Charnwood and emerging position under the Duty to Cooperate the following Modifications to Policy DS2 are considered necessary:

*“Within 6 months of the agreement by all partners of the Statement of Common Ground for the apportionment of unmet housing and employment need, **or within 12 months following adoption of this Plan where no SoCG is agreed**, the Council will publish a review of this local plan. **The review will fully assess the Council’s record in delivery against the housing needs identified in this Plan following adoption and the role of its spatial strategy provides in addressing identified cross-boundary strategic priorities and their influence upon the distribution of housing needs**. Should a full or partial update be triggered by the review, the Council will commence the update (defined as being publication of an invitation to make representations in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012) within 12 months of the publication of the review. Once the update has commenced the Council will submit the Plan Update to the Planning Inspectorate for Examination within a further 36 months of the date of commencement of the update.*

In the event that this submission date is not adhered to, or within 12 months following adoption of this Local Plan where no Statement of Common Ground is agreed, this Plan will not be considered to secure levels of growth that accord with government policy where its annual housing requirement falls below the most recent calculation of local housing need (or any successor in policy). In these circumstances calculation of the minimum five year housing requirement will be provided by the calculation of local housing need inclusive of any shortfall against the housing requirements of this Plan under Policy DS1 since adoption and prior to the Plan Update submission date required by this Policy”

2.31 Policy DS1 is also requested to be modified to reflect the timescales in Policy DS2. This would effectively introduce comparable provisions to the Bedford Local Plan 2030 in terms of engaging the ‘tilted balance’ for the purposes of decision-taking where there is a failure to produce updates to the Plan, as required:

*“In circumstances where a five-year supply of deliverable housing land cannot be demonstrated, **or where the timescales within Policy DS2 are not adhered to**, proposals for development should only be refused where any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. In these circumstances, proposals are only likely to be permitted where they:*

- *accord with the pattern of development set out in table above;*
- *adjoin the Limits to Development;*
- *do not prejudice the delivery of infrastructure set out at Appendix 3; and*
- *accord with other development plan policies.”*

1.11 What is the role and status of the Strategic Growth Plan (EB/DS/6)? What consultation has been undertaken and is it subject to external scrutiny? How much

weight does the Strategic Growth Plan have for plan making purposes?

2.32 No response.

1.12 Have the Plan's transport impacts been considered on a cross boundary basis, including the role of active and sustainable travel modes? What is the role of the Strategic Transport Assessment which is currently underway? Is this separate from the assessment of the specific impacts of the Plan's proposed growth on the strategic and local highway network as outlined in EB/TR/11, 12 & 13?

2.33 No response.

1.13 Is the need for new burial space a strategic cross boundary matter, and if so how is it being dealt with?

2.34 No response

1.14 Are there any relevant strategic matters that have not been considered on a cross-boundary basis? If so, why?

2.35 No response.

1.15 In overall terms, is there evidence to demonstrate that, during the preparation of the Plan, the Council has engaged constructively, actively and on an on-going basis with relevant authorities and prescribed bodies on relevant strategic matters? Has the Duty to Cooperate been met in a manner consistent with paragraphs 24 - 27 of the Framework?

2.36 Subject to the inclusion of a robust review mechanism, there is no evidence to suggest that the Council has not fulfilled the Duty to Cooperate in accordance with paragraphs 24 to 27 of the Framework.

3.0 ISSUE 2 - WHETHER THE PLAN HAS BEEN INFORMED BY A SUSTAINABILITY APPRAISAL

1.16 Is it clear how the Sustainability Appraisal (SD/5 & 6) has informed the preparation of the Plan and its policies at each stage, and how mitigation measures have been dealt with?

- 3.1 From April to June 2018, an initial set of reasonable alternatives were consulted on as part of the Local Plan's Spatial Strategy for Growth, which was backed up by an interim Sustainability Evaluation Study ('Towards a Local Plan for Charnwood'). Then, in September 2018, a more refined list of reasonable alternatives was created, which tested the evidence. In the Sustainability Appraisal Report, the justification for picking or discounting the various choices is outlined (2021).
- 3.2 The alternatives options considered were sufficiently diverse and were considered in detail against an appropriate set of parameters.

1.17 Does the Sustainability Appraisal robustly test the Plan against reasonable alternatives for the scale and distribution of housing, employment, retail and other types of development set out in Policy DS1?

- 3.3 The Hybrid Option was recognised as the preferred option after testing the Plan against reasonable alternatives relating to the scale and distribution of housing growth.
- 3.4 Further the SA at section 7.2 appears to list Anstey as being part of the Leicester Urban Fringe, but then also refers, at the sub heading between paragraphs 7.2.30 and 7.2.31, as Anstey sitting within the Service Centre tier.
- 3.5 From a review of the content of Chapter 7, it is assumed that the Council's intention was to list Anstey as a Service Centre and not as part of the Leicester Urban Fringe. Whilst assumed erroneous, the inclusion of Anstey in the fringe settlements is reflective of the settlement's proximity to Leicester.
- 3.6 The line between the LUA and Anstey is further blurred in Table 6.2 of the SA, where Anstey and Glenfield are grouped together for the purpose of assessing housing site options. The failure of the SA to consistently recognise the complementary nature of these locations in terms of their ability to support future growth has precluded opportunities to maximise the potential for site allocations as part of growth options.

1.18 What alternative spatial strategy options were considered, which were discounted and are the reasons for this clear? What was the purpose of the 'additional focussed assessment' in Appendix G of the Sustainability Appraisal and how has this informed the development strategy in Policy DS1?

- 3.7 At each of the settlement tiers, a range of growth options were presented, with growth in Anstey ranging from 100 to 950 dwellings, with the upper being associated with the adoption of a higher growth figure. It is noted from the SA that Option 2, Leicester & Loughborough & Services Centres, would see growth of around 400 additional dwellings in Anstey, which falls below the number proposed for allocation under site HA43 which will deliver 600 dwellings in the settlement.
- 3.8 When tested, the option for 950 dwellings performed reasonably well and in particular it was noted that adoption of such a strategy would give rise to significant positive effects in respect of addressing issues of deprivation. The main reason for discounting this option and seeking a higher level of growth at the Service Centres was on landscape grounds. Indeed, this is confirmed at paragraph 5.1.5 of the SA which states;

"Service Centres will have similar effects across most growth options under 2,100 dwelling. There will be significant negative effects on biodiversity, landscape and

soil resources with growth of up to 3,100 dwellings or more, however this is expected to have significant positive effects for housing, the economy and potentially accessibility”.

- 3.9 Even when considered against the hybrid option, the SA recognises at paragraph 4.6.6 that some capacity for higher growth has been identified in Anstey, with around 200 dwellings being considered in the LUA. It is unclear from the evidence available (Paragraph 5.1 of the Development Strategy and Site Selection Paper TP/2) if this additional capacity has been maximised.
- 3.10 Accordingly, if it is determined that additional sites are required, it is clear that there is significant capacity in Anstey and within the LUA which can be brought forward in the short-term, as long as the sites in question do not give rise to any significant harm that cannot be mitigated. Any land to be identified to address the unmet need from Leicester could be reasonably picked up in this additional capacity around Anstey and the LUA, given the proximity of the settlement to Leicester and acknowledging the Council’s previous recognition of the settlement’s interrelationship with supporting growth with the adjacent LUA boundary.
- 3.11 With this in mind it would be helpful for the Council, through a further addendum to the SA, to set out a combined positions for Anstey/Glenfield/LUA, that would support a higher level of growth than that proposed for these locations individually.

1.19 Have any concerns been raised about the Sustainability Appraisal and, if so, what is the Council’s response to those? Have the requirements of the Strategic Environmental Assessment Directive been met?

- 3.12 No response.

4.0 ISSUE 3 – WHETHER THE PLAN HAS BEEN PREPARED IN COMPLIANCE WITH OTHER LEGAL REQUIREMENTS

1.20 Is the Habitats Regulations Assessment (SD/8) robust and have the requirements of the Conservation of Habitats and Species Regulations 2017 been met? Are any main modifications necessary for legal compliance with the Regulations?

4.1 No response.

1.21 Are any adjustments to the Plan period necessary for consistency with the NPPF's provision that strategic policies should look ahead for a minimum 15 year period from adoption?

4.2 In line with the requirements of the NPPF 2021 (paragraph 22), it is considered appropriate for the Council to consider extending the Plan period for a minimum of 15-years post adoption. If adoption of the Plan were to slip beyond 2023, the Plan period, as currently proposed, would fail to reach the minimum requirement. Therefore, and so as to ensure sufficient flexibility is established in the Plan period, we recommend that that the Plan period is extended beyond 2038 to 2040. The implications of any such extension should be considered within the context addressing contributions towards Leicester's unmet needs as part of the ongoing Examination.

1.22 Has the submitted Local Development Scheme (SD/16) been updated as set out in the Council's letter (Exam 2) and has the Plan been prepared in accordance with the scope, timescale and content set out in the revised document?

4.3 No response.

1.23 Has consultation on the Plan been carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement (SD/14)?

4.4 No response.

1.24 Does the Plan include policies designed to ensure that the development and use of land in the Borough contributes to the mitigation of, and adaption to, climate change in accordance with the legislation

4.5 No response.

1.25 In what ways has Plan preparation and the Plan's content had regard to the aims expressed in S149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?

4.6 No response.

1.26 Has the preparation of the Plan complied with the Planning and Compulsory Purchase Act 2004 (as amended) Part 2 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) in all other respects, including in terms

- of:
- i. Having regard to the Planning Practice Guidance that the preparation of the Plan should take into account policies and proposals in Neighbourhood Plans;
 - ii. Making clear which policies will be superseded if the Plan is adopted.

4.7 No response.

1.27 Do the strategic policies (page 3 of the Plan) provide an appropriate framework for the preparation of Neighbourhood Plans and what is the up-to-date position with Neighbourhood Plan preparation in the Borough?

4.8 No response.

1.28 Has Plan preparation had regard to the additional matters set out in Section 19 of the 2004 Act and in Regulation 10 of the 2012 Regulations?

4.9 No response.



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