

**CHARNWOOD LOCAL PLAN EXAMINATION**  
**MATTER 1 – DUTY TO CO-OPERATE AND OTHER LEGAL REQUIREMENTS**

**Inspectors' issues and questions in bold type.**

This Hearing Statement is made for and on behalf of Bowbridge Homes (Nanpantan) Ltd. and should be read in conjunction with our representations dated 23<sup>rd</sup> August 2021 [REF: PSLP/630] submitted pursuant to the consultation by Charnwood Borough Council on its Pre-Submission Draft Local Plan 2021-37 [REF: SD/2] of July/August 2021. This Hearing Statement answers specific questions as set out in the Inspectors' Matters, Issues & Questions ["MIQs"] document issued on 25<sup>th</sup> April 2022.

**Issue 1 – Whether the Council has complied with the Duty to Cooperate in the preparation of the Plan**

**Q1.5 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?**

The Leicester and Leicestershire authorities have published a Statement of Common Ground for Housing and Employment Needs ["SoCG"], with this being presented to each of the member Council's pursuant to their formal agreement. The SoCG was made available on the Strategic Growth Plan website, though has since been removed for the following reason, as quoted on that website:

*"Following the publication of the above documents, further technical information has come to light in relation to the employment figures set out in the HENA. As a result, the published documents have been withdrawn from the Strategic Growth Plan website. Revised versions of the SoCG, HENA and SA will be published in due course."*

Notwithstanding its removal from the Strategic Growth Plan's website, the SoCG is included on the agenda for Charnwood Borough Council's Cabinet meeting of 9<sup>th</sup> June 2022, along with a short supplementary report correcting the employment needs figures for the Borough - the amount of unmet employment needs apportioned to the Borough from Leicester City remaining at 23ha. This suggests it was not necessary for a further Member Advisory Group to take the SoCG through the governance of each of the Leicester and Leicestershire authorities.

**Q1.8 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?**

The following comments are made on the basis of the SoCG that was published on the Strategic Growth Plan's website prior to its recent removal and as is included on the agenda of Charnwood Borough Council's Cabinet meeting scheduled for 9<sup>th</sup> June 2022.

The SoCG identifies a local housing need of 1,111no. dwellings per year for Charnwood and with this aligning with the figure established in the Pre-Submission Draft Local Plan [REF: SD/2]. However, with the SoCG also identifying that Charnwood should accommodate 7% of the 18,700no. dwellings comprising the total unmet need for Leicester City – and with this equating to an additional 1,248no. dwellings for Charnwood - the Plan will need to provide for at least 19,024no. dwellings across the Plan period 2021-2037.

The Plan should therefore make provision to deliver Leicester City's unmet needs and also include provision for appropriate flexibility. Whilst the Pre-Submission Draft Local Plan [REF: SD/2] included a circa 10% headroom within its provision of 19,461no. dwellings to 2037 (which is itself considered low and in need of being increased to 15% as per neighbouring Harborough District Council), this headroom would be reduced further still to only 2% if the proposed allocations were to also address the increased housing requirement of 19,024no. dwellings, to include Leicester City's unmet housing needs apportionment for Charnwood. In order to maintain a circa 10% headroom as previously proposed, the Plan will need to include additional allocations of circa 1,465no. dwellings. The Plan should therefore be modified to increase the housing requirement through the allocation of further sites in order to provide for the agreed apportionment of Leicester City's unmet housing need. This is demonstrated in further detail in the context of specific amounts of housing needed in our Hearing Statement submitted in respect of Matter 4 (Issue 1).

Policy DS1 of the Pre-Submission Draft Local Plan [REF: SD/2] establishes a strategy of urban concentration, with Loughborough identified as an Urban Centre and the most sustainable location for growth in Charnwood and with this element of the policy considered a robust and appropriate approach for the distribution of further housing.

In our Pre-Submission representations, dated 23<sup>rd</sup> August 2021 [REF: PSLP/630], we demonstrated the suitability and deliverability of a site on land at Leconfield Road to provide for an additional 30no. dwellings – this having been considered through the Sustainability Appraisal [REFS: SD/5 and SD/6] under site reference PSH447 and having previously been included as housing allocation HS33 in the Regulation 18 consultation of the Draft Charnwood Local Plan 2019-36 [REFS: SD/20 and SD/20a] – and should now be considered as an additional allocation to ensure the Plan makes sufficient provision for housing requirements over the Plan period following the recent publication of the SoCG.

**Q1.10 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?**

Policy DS2 of the Pre-Submission Local Plan seeks to address Leicester City's unmet housing need via a review process that postpones dealing with the apportionment of its unmet housing needs to a future Local Plan Review, which is considered unsound.

It is apparent from the Charnwood's aforementioned report to its Cabinet meeting scheduled for 9<sup>th</sup> June 2022 that, despite the publication of the SoCG ahead of the Examination Hearing Sessions, it continues to propose that the unmet need from Leicester City is addressed separately through a subsequent review and potential update.

However, with the SoCG having now established the scale and apportionment of Leicester City's unmet housing need, it is clearly appropriate for the resultant implications for Charnwood to be addressed through the Examination of its Draft Local Plan, with modifications made, as necessary, to address those implications. In this context, Policy DS2 should no longer be needed.

**Issue 2 - Whether the Plan has been informed by a Sustainability Appraisal**

**Q1.19 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?**

Concerns over the Sustainability Appraisal [REFS: SD5 and SD/6] as prepared by Aecom on behalf of the Council in May 2021 were raised during the Pre-Submission consultation in our representations dated 23<sup>rd</sup> August 2021 [REFS: PSLP/630], with particular regard to how elements of this were flawed and (along with the Council's Development Strategy and Site Selection Topic Paper of July 2021 [REF: TP/2]) failed to take proper account of the available evidence that had been submitted in support of sites, including that submitted at the Regulation 18 stage, and with this resulting in inconsistencies between the comparative assessment of sites.