



Inspectors Housden and Baugh-Jones  
c/o Ian Kemp

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Date: 21 February 2022

Dear Inspector Housden and Inspector Baugh-Jones,

### **Charnwood Local Plan Examination – Local Development Scheme**

Thank you for your letter 2 February 2022 in which you sought clarification on a variety of preliminary matters.

I am now writing in response to these preliminary matters, in order to assist with the identification of the matters, issues and questions, as requested. In order to address your request, I will provide responses to your questions as they appear in original letter:

#### Superseded Policies

The Borough Council notes and acknowledges the Inspectors' statement on this matter. To this end, the Borough Council has prepared a schedule of superseded policies, which is included for your information here under Appendix A.

The Borough Council proposes that the schedule of superseded policies be incorporated into the Charnwood Local Plan as a new appendix – Appendix 5, which avoids the need for renumbering. It is also proposed that the new Appendix 5 be referenced under Local Plan Paragraph 1.4. It is anticipated that these additions to the Local Plan be introduced as modifications.

#### Main Modifications

As requested, the Borough Council welcomes the opportunity to formally request the Inspectors to recommend modifications as set out under Section 20(7C) of the Planning and Compulsory Purchase Act 2004 (as amended).



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## Five-Year Land Supply

The Borough Council intends to prepare a note setting out an updated housing trajectory by the end of April. This will include up to date completions information to the end of the 2021/22 monitoring year and the information provided by site promoters on housing delivery in statements of common ground and other similar documents. The purpose of this note is to provide updated information to demonstrate compliance with the requirement set out under NPPF Paragraph 68(a) that the plan should identify a supply of specific, deliverable sites for years one to five of the plan period. It is not the Borough Council's intention to seek to use the provision in paragraph 74(b) of the Framework in relation to using the examination to confirm a five-year housing land supply for recently adopted plans.

The Borough Council is obtaining updated information from the promoters of all the sites allocated in the Local Plan. It is using a tiered approach with statements of common ground for up to 15 strategic sites and two versions of a proforma for the remaining site allocations in the Plan. The Borough Council is using a comprehensive proforma to demonstrate the deliverability of most sites in the Plan (c44 sites) and a simpler one for 10 sites that are expected to be developed later in the plan period. Work on the statements of common ground has been ongoing for several months and is expected to be concluded by the middle of April 2022 and the proformas are expected to be returned by the middle of March.

## Local Development Scheme

The Borough Council is pleased to confirm that it has prepared a new Local Development Scheme that takes account of the delay in submission of the Local Plan (on 3 December 2021) and incorporates the proposed dates for the hearing sessions (see below). The new Local Development Scheme will be considered by the Council's Cabinet on 10 March 2022. Subject to their agreement it will be adopted and published.

## Statement of Common Ground on Housing and Employment Needs (SCG-1)

In order to respond to the Inspectors' questions the Borough Council encloses a statement that has been prepared in consultation with the Leicester and Leicestershire Joint Strategic Growth Manager. A statement is enclosed under Appendix B.

## Progress of the Examination

Finally, the preliminary matters letter initiated discussion on the structure and timing of the examination – specifically in relation to the start, duration and potential format of the hearing sessions. I am pleased to confirm that since receiving your preliminary matters letter good progress has made in identifying the start and anticipated duration of the hearing sessions. To that extent please accept this letter as formal confirmation that the Borough wishes to accept your suggested start date for the hearing sessions during the week commencing Monday 27 June 2022, with subsequent sessions during the weeks commencing 11 and 18 July 2022. The Borough Council confirms that it has already begun to manage its own internal resources to focus upon these dates and will, subject to confirmation, seek to manage any necessary partner and other external resources accordingly.

In respect of the hearing sessions themselves it is proposed that a hybrid meeting format be adopted. The Borough Council will work with the Inspectors, via Ian Kemp the

Programme Officer, to manage, identify and secure the venues in accordance with demand. In parallel, the Borough Council is exploring the possibility of livestreaming hearings sessions, should this prove necessary. The Inspectors' comments on the necessity and use of livestreaming are sought.

Yours sincerely

Richard Bennett  
Head of Planning and Regeneration

## **Appendix A: Schedule of Policies Superseded by the Charnwood Local Plan 2021-2037**

### **Borough of Charnwood Local Plan (2004) Saved\* Policies**

ST/2 Limits to Development  
EV/1 Design  
EV/29 Access to Watercourses for Maintenance  
EV/31 Sewage Disposal Capacity  
H/11 Houseboats  
H/12 Student Halls of Residence  
H/17 Extensions to Dwellings  
E/4 Loughborough Science Park  
E/5 New Employment Areas  
E/5(a) Extension to Hayhill Industrial Estate, Sileby  
E/5(b) Extension to Woodbrook Industrial Park, Belton Rd, Loughborough  
E/5(c) Land at Dishley Grange, Hathern  
E/5(d) Granite Way, Mountsorrel  
E/5(e) Land at Rothley Lodge, East of the A6 Bypass, Rothley  
E/5(f) Land North of Harrowgate Drive and West of the A6, Wanlip  
E/7 Control of Employment Uses in Primarily Employment Areas  
CT/1 General Principles for Areas of Countryside, Green Wedge and Local Separation  
CT/2 Development in the Countryside  
CT/3 Development in Green Wedges  
CT/4 Development in Areas of Local Separation  
CT/13 Riding Stables, Kennels and Similar Establishments  
CT/14 Replacement Dwellings SLR  
TR/4 Roads and Highway Improvements to be provided in Association with New Development  
TR/12 Safeguarding the Great Central Railway Corridor  
TR/18 Parking Provision in New Development  
TR/20 Public Car Parking Provision Serving District and Local Centres  
TR/21 Planning Criteria for the Design and Layout of New Car Parks  
TR/30 Planning Criteria to Assess Proposals for Roadside Service Areas  
CA/7 Pedestrian Preference in Loughborough Town Centre  
CA/10 New Local Centres  
CA/11 Use of Upper Floors  
CA/12 Shop Front Design  
CF/1 Retention of Existing Community Facilities  
CF/4 Loughborough University and College Campuses  
CF/8 Fire Station Site A6/A46 Junction, Wanlip

### **Charnwood Local Plan 2011 to 2028 Core Strategy**

CS1 Development Strategy  
CS2 High Quality Design  
CS3 Strategic Housing Needs  
CS4 Houses in Multiple Occupation  
CS5 Gypsies, Travellers and Travelling Showpeople  
CS6 Employment and Economic Development  
CS7 Regeneration of Loughborough  
CS8 Regeneration of Shepshed  
CS9 Town Centres and Shops

CS10 Rural Economic Development  
CS11 Landscape and Countryside  
CS12 Green Infrastructure  
CS13 Biodiversity and Geodiversity  
CS14 Heritage  
CS15 Open Spaces, Sports and Recreation  
CS16 Sustainable Construction and Energy  
CS17 Sustainable Travel  
CS18 The Local and Strategic Road Network  
CS19 North East of Leicester Sustainable Urban Extension  
CS20 North of Birstall Direction of Growth  
CS21 Watermead Regeneration Corridor - Direction of Growth  
CS22 West of Loughborough Sustainable Urban Extension  
CS23 Loughborough University and Science & Enterprise Park  
CS24 Delivering Infrastructure  
CS25 Presumption in Favour of Sustainable Development

*\* On 27th September 2007, the Secretary of State made a Direction under Schedule 8 of the Planning and Compulsory Purchase Act 2004 that the following policies would be saved.*

## **Appendix B Statement of Common Ground on Housing and Employment Need (SCG1)**

The following information has been provided in consultation with the Leicester and Leicestershire Joint Strategic Growth Manager concerning the Statement of Common Ground for Housing and Employment Needs.

### **Statement of Common Ground Evidence**

#### Overview

Regarding work streams listed below, contracts have been awarded and work commenced in the Spring of 2021. The commissioning authorities are Leicestershire County Council, Leicester City Council and the 7 Leicestershire District and Borough authorities.

- Housing and Economic Needs Assessment (HENA)
- Strategic Growth Options and Constraints Mapping
- Strategic Transport Assessment
- Sustainability Appraisal

The HENA and the Sustainability Appraisal are the key pieces of evidence that will inform the Statement of Common Ground apportioning Leicester's unmet need to 2036. The Strategic Transport Assessment, Strategic Growth Options and Constraints Mapping take a longer-term perspective that will inform the next steps for our Strategic Growth Plan to 2050.

#### Timescales

The HENA and Sustainability Appraisal will be completed by May 2022 and will be used to inform a Statement of Common Ground apportioning Leicester's unmet need to 2036. This work has been prioritised so we can complete the Statement of Common Ground as soon as possible. The Strategic Transport Assessment and Strategic Growth Options and Constraints Mapping are at a slightly earlier stage of preparation and the intention is to complete this work in the summer. At this stage, it is would estimated that it will be available during June/July 2022. The Joint Strategic Growth Manger, through Charnwood Borough Council will endeavour to keep you up-dated as the work continues to progress and the timescales become clearer.

#### Scope of Work

The scope of the work for each piece of evidence is set out below:

The contract for the **Housing and Economic Needs Assessment (HENA)** was awarded to ICENI Projects Limited. The scope of the HENA is:

- to assess whether the Housing Market Area (HMA) and Functional Economic Market Area (FEMA) are still fit for purpose.
- to provide an evidence based, policy compliant assessment of the future economic needs of Leicester & Leicestershire and the requirement for employment land and premises to 2050

- To provide up to date housing mix, type and affordability evidence that updates the 2017 Leicester & Leicestershire Housing and Economic Needs Assessment HEDNA that will identify optimum mix and affordable housing requirements as well as the headline need for specialist accommodation set in the context of overall housing requirements.
- To assess the short, medium and long term impacts of COVID19 and BREXIT on the Leicester & Leicestershire economy generally and specifically the need for employment land and premises and to consider the implications for housing growth and distribution.
- To identify whether there are robust reasons to depart from the Standard Method of calculating future housing needs – including any economic and employment led reasons.
- To inform an understanding of the links and interrelationships between future housing need and future employment needs (including mix and type). A key objective is to understand whether employment forecasts justify an uplift and / or redistribution of housing and / or whether the housing requirements necessitate a redistribution of employment land.
- To take into account other evidence and strategies in arriving at conclusions including the 'Strategic Warehousing & Logistics Study 2020' and Local industrial Strategy and what contribution these make to future employment requirements in the FEMA and individual Local Authorities and any effects for employment and housing distribution.
- To identify future amount of jobs in non B-class7 employment sectors. This could include all jobs not in office, research & development, light and general industry and storage and distribution that are not normally based on employment sites.
- To understand the optimum locations for meeting unmet housing needs arising from Leicester City.
- In the context of employment, the objectives are to understand the optimum locations for different types of employment sectors (based on supply and demand for employment land & premises and preferences of the market). The study should also seek to understand the quantitative / qualitative gaps, market failures and opportunities (including in identified growth corridors and nodes) and should seek to identify what proportion of the future requirements could be delivered in these priority growth areas.
- To provide an overview of Leicester & Leicestershire's future employment role in different sectors in light of existing and predicted market strengths and changing economic landscape; and
- To provide a basis for future evidence gathering including an assessment of transportation impacts and more detailed environmental impacts.

The contract for the **Strategic Growth Options and Constraints Mapping** was awarded to AECOM Limited. The study provides an assessment of the merits of each of the 'reasonable' Strategic Growth Options in order to understand which of the options individually and collectively offer a suitable approach to delivering the housing, employment and associated infrastructure needs of the Leicester & Leicestershire HMA/FEMA and help to meet the aspirations of the Strategic Growth Plan.

The site size threshold for 'Strategic Growth Options' is set at:

- Housing – 1,000 homes
- Employment – 25 hectares
- Mixed use – Exceeding either of the above thresholds (although others considered on their merits)

The Study assesses:

- the potential interrelationships between Strategic Growth Options in delivering wider benefits (including infrastructure provision) and meeting the objectives of the Strategic Growth Plan.
- the development potential of Growth Options in terms of:
  - Their potential capacity (employment and housing)
  - Their attractiveness to the market and likely viability.
  - Any constraints to developability and deliverability.
- environmental constraints (Built, Historic & Natural Environment) and to assess the implications for delivering Strategic Growth Options
- the potential to deliver necessary infrastructure (social, utilities, transport and green infrastructure) and the capacity of existing infrastructure to accommodate growth

The contract for the **Strategic Transport Assessment (STA)** was awarded to Leicestershire Network Data and Intelligence Team. The STA considers alternative ways to distribute growth across Leicester & Leicestershire to 2051, including unmet need from Leicester. The purpose is to provide objective evidence that considers alternative ways to distribute growth from a transport perspective. These alternatives are theoretical to large degree, designed to test alternatives that are meaningfully different over the period to 2051.

Each local planning authority will determine an appropriate locational strategy as part of their Local Plan preparation taking account of the scale of growth, national, sub regional and local policy documents and evidence.

The contract for the **Sustainability Appraisal** was awarded to Aecom Limited. The Sustainability Appraisal provides evidence to inform the distribution of Leicester's unmet need between 2020 and 2036, demonstrating that reasonable options/alternatives have been considered for this period, and that the approach is sustainable over this timeframe.

### **Working Arrangements to Pursue Apportionment of Unmet Need**

Since the 16<sup>th</sup> December 2020 the following groups have held meetings to pursue the apportionment of unmet need across Leicester and Leicestershire.

- Members' Advisory Group (MAG)
- Strategic Planning Group (SPG)
- Planning Officers' Forum (POF)



- Statement of Common Ground Task & Finish Group

Joint strategic planning work is overseen by the MAG. It meets on a regular basis, currently every two months. MAG is advisory and not a decision making body. Any decisions on strategic matters are made by individual authorities through their own governance processes. Since the 16<sup>th</sup> December 2020 there have been the following meetings of MAG:

- 11 February 2021
- 20 May 2021
- 29 July 2021
- 30 September 2021
- 16 December 2021

MAG is supported by a SPG made up of senior officer representatives. SPG has met on a monthly basis since the 16<sup>th</sup> December 2020, and will continue to do so.

Chief Planning Officers meet formally as the POF and provides professional advice to the SPG. POF is a monthly meeting.

Statement of Common Ground Task & Finish Group -. This is an informal officer group that meets most weeks (since 16<sup>th</sup> December 2020) to progress the programme of evidence that will inform the Statement of Common Ground to 2036 and the next steps for the Strategic Growth Plan.