

Charnwood Local Plan Examination
Inspectors - Mrs S Housden BA (Hons) BPI MRTPI &
Mr Hayden Baugh-Jones MRTPI
Programme Officer – Mr Ian Kemp
jdkemp@icloud.com
07723 009166

Mr R Bennett
Head of Planning and Regeneration
Charnwood Borough Council
Southfield Road
Loughborough
Leicestershire
LE11 2TX

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Dear Mr Bennett,

Charnwood Local Plan Examination

Thank you for your letter received by email on 30 June 2022.

Firstly, we would like to thank the Council and Mr Kemp for the arrangements made to enable the hearing sessions to take place at Loughborough Town Hall last week and for the contributions from the Council's team and all other participants at the hearing sessions.

As we indicated at the Matter 1 hearing session, the Council's willingness, in principle, to meet Charnwood's apportionment of Leicester's unmet housing need through the submitted Plan rather than through a Plan review represents a material change in circumstances. Paragraphs 3.23 and 3.25 of the Leicester and Leicestershire Authorities Statement of Common Ground relating to Housing and Employment Land Needs (June 2022) (hereafter referred to as the SoCG) confirm that the testing process in relation to the apportionment for both housing and employment should take place through the plan making process of the respective local planning authorities.

The Council has indicated that it may be possible to increase housing land supply to meet Charnwood's apportionment of the unmet housing need, but before assessing that matter, we must firstly examine whether the housing requirement figure has been positively prepared. A pause in the current Examination is therefore essential to enable all interested parties to review and have an opportunity to comment on the evidence that

underpins the proposed apportionment for housing and for us to be able to test that evidence in a measured and robust way.

This letter sets out our proposed arrangements for testing the evidence and resuming the Examination hearing sessions. We will work constructively and collaboratively with the Council to achieve that. We acknowledge the importance of having a sound and up to date adopted Local Plan for the Borough, but we must also ensure that there is a fair, open and robust process to test the evidence in relation to unmet needs and to assess the implications, if any, for the submitted Plan. With that in mind, sufficient time for consultation and resumed hearing sessions needs to be incorporated into the revised timetable.

We note that the updated SoCG and evidence documents have now been published on the Leicestershire Strategic Growth Plan website and you have forwarded those to us. Could the Council please confirm the date by which the SoCG will have been considered through the governance processes of the respective local planning authorities who will be signatories to the SoCG.

Paragraph 3.20 the SoCG is clear that the working assumption of the 'headline' figures for Leicester's unmet need of 18,700 homes and 23 hectares of employment land (2020 – 2036) will be subject to testing through the Leicester Local Plan. The scope of consultation on unmet need for housing and employment must therefore be set accordingly and should focus on the apportionment set out for Charnwood as proposed in the documents set out below.

Although the submitted Plan proposes to meet all of Leicester's unmet need for employment land, the SoCG deals with both employment and housing and the employment evidence should therefore be included within the scope of the consultation. The resumed session for Matter 5 will cover whether there is enough employment land allocated in the Plan, in the right locations, and of the right quality to ensure that the Plan is soundly based to meet Charnwood's need and Leicester's unmet need for employment land.

Consultation on Unmet Need Evidence Documents

We would propose that the evidence documents underpinning the SoCG are made available for consultation and that any comments on them are sought through a focused set of Matters, Issues and Questions (MIQs) which we would prepare. The following documents would form part of the consultation:

- Leicester and Leicestershire Authorities – Statement of Common Ground relating to Housing and Employment Land Needs (June 2022)
- Leicester and Leicestershire Housing and Economic Needs Assessment Final Report and Executive Summary (June 2022)
- Leicester and Leicestershire Housing and Economic Needs Assessment – Housing Distribution Paper (June 2022)
- Leicester and Leicestershire Housing and Economic Needs Assessment – Employment Distribution Paper (June 2022)
- Leicester and Leicestershire Statement of Common Ground Sustainability Appraisal Report and Non Technical Summary (June 2022)

We would also ask the Council to consider whether any update or amendment to the Housing and Jobs Note (Exam 18) prepared by ICENI is necessary in the light of the contents of this letter, following which we will confirm whether this should be included in the consultation documents.

The background evidence and the written responses to the consultation questions would be examined through a single issue hearing session, with an opportunity for any additional representors responding to the consultation to exercise their right to be heard by us. Whilst the length of any consultation undertaken during the Examination process is not prescribed in the Regulations, given the approaching summer holiday period we would propose a 6 week consultation ending in mid September. All those who responded to the Regulation 19 Pre Submission Consultation (July and August 2021) should be consulted.

Due to our existing commitments, the potential dates for the session on unmet need would need to be during the week commencing 16 October or 23 October 2022. In terms of housing need, the three potential outcomes of that process would be that the current apportionment of 78 dwellings per year is appropriate, that the figure should be reduced or that it should be increased. The Plan already seeks to accommodate the unmet need for employment, but the implications for the Plan's employment strategy would also need to be considered.

Irrespective of any particular outcome, the Council would then need some time to consider the implications for the soundness of the submitted Plan, including the housing requirement, the proposed distribution of development and the proposed housing allocations. We would suggest that the implications and any proposed main modifications could be set

out in a Background or Topic Paper prepared by the Council. We would publish supplementary MIQs so that participants who have already submitted hearing statements or who have responded to the consultation on unmet need could provide a supplementary response. At that stage, we would then resume the hearing sessions to cover the remaining Matters in the hearing programme.

Finally, we have received the Transport Costs Addendum Viability Report. This should be made available on the Examination website in the entry for Exam 32a. This document can then be considered as part of the resumed Matter 9 session on Viability and Monitoring and any additional questions that we have in response will be included on the agenda for that session.

We acknowledge that the delay to the Examination is not the position the Council would wish to be in and that it will need some time to consider the proposed arrangements. However, we consider that the suggested approach set out above represents a pragmatic and constructive way forward.

In the meantime, we will progress the Follow Up list from Week 1. If there are any queries on the contents of this letter, or if we can assist with any further advice the Council may require, please let us know via Mr Kemp. This letter should be put on the Examination web site.

Other parties should please note that at this stage we are not seeking the views of anyone other than the Council on any of the matters covered in this letter.

Yours sincerely

Sarah Housden and Hayden Baugh Jones

INSPECTORS