

Charnwood Local Plan Core Strategy Review Assessment

The following matrix supplements the [National Planning Policy Framework](#) (NPPF) (paragraph 33 in particular) and the associated [National Planning Practice Guidance](#) on the review of policies within the plan. It has been prepared by the Planning Advisory Service to assist Local Planning Authorities with the requirement to review their local plan every five years and has been completed by Charnwood Borough Council in order to assess whether the policies in the Charnwood Local Plan Core Strategy, adopted in November 2015, need to be updated. The matrix identifies where circumstances may have changed and whether or not the policy / policies in the plan continue to be effective in addressing the specific local issues that are identified the plan. The purpose of the review assessment is to establish whether and to what extent, an update of policies is required.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	The plan policies still reflect current national planning policy requirements.	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence):</p> <p>The Core Strategy still reflects the broad thrust of the policy requirements set out in the revised NPPF (2019). However, there are new components set out in the NPPF, which are not reflected in the Core Strategy. These include:</p> <ul style="list-style-type: none"> The NPPF states that non-strategic policies should be clearly distinguished from strategic policies. Strategic policies, as defined by Annex 2 of the NPPF, address strategic priorities in line with the requirements of Section 19 (1B-E) of the Planning and Compulsory Purchase Act 2004, and should look ahead over a minimum 15 year period from adoption. Non-strategic policies, also defined by Annex 2, are policies contained in local or neighbourhood plans that are not strategic (i.e. policies and site allocations that do not address strategic priorities). The Core Strategy does not clearly distinguish between ‘strategic policies’ and ‘non-strategic’ policies. The NPPF introduces a standard methodology for conducting local housing needs assessments and the Housing Delivery Test. Neither of which are referenced in the Core Strategy. Policy CS1 outlines a housing requirement for Charnwood, as per previous national policy and guidance, utilising evidence from a Strategic Housing Market Assessment. The NPPF – specifically paragraphs 34 and 57 – places a renewed emphasis on viability testing and the front-loading of viability assessments at the plan-making stage (rather than when determining applications). The two paragraphs place exacting requirements on plan-makers and the clarity required on matters of affordable housing and infrastructure is not present within the Core Strategy’s policies. Policy requirements for infrastructure are clearer in Policy CS19 through to Policy CS23 – but Policy CS24 does not conform with the NPPF.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<ul style="list-style-type: none"> • The NPPF expects development plans and brownfield registers to identify land to accommodate at least 10% of the housing requirement on ‘small and medium sized sites’ (up to one hectare) – unless it can be shown that there are strong reasons why this target cannot be achieved. The Core Strategy does not reflect this requirement and Policy CS1 and Policy CS3 do not set out how the LPA will deliver on small and medium sites. • The NPPF promotes town centre diversification and recognises that this is key to the long-term vitality and viability of town centres. Paragraph 85 states that policies should clarify ‘the range of uses permitted in such locations, as part of a positive strategy for the future of each centre’. The Core Strategy (through Policies CS7, CS8, and CS9) does not reflect this change of emphasis, or provide enough clarity with respect to permissible uses. • The NPPF has altered the way that heritage and historic environment policies should be written. LPAs are expected to maintain, or have access to, a historic environment record. The NPPF also changes the way the impact of proposed development on the significance of designated heritage asset is assessed. Paragraph 193 states that great weight should be given to an asset’s conservation...irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. This wording is not reflected in Core Strategy, or in Policy CS14. • The revised NPPF encourages opportunities to incorporate biodiversity improvements in and around developments where this can secure measurable net gains for biodiversity. Policy CS13 does not explicitly refer to securing measurable net gains or identify how applicants can gauge changes to/minimise impacts upon biodiversity (e.g. through the preparation of a Biodiversity Impact Assessment). • Within Annex 2 of the revised NPPF social rent falls under the definition of ‘affordable housing for rent’; it is no longer outlined as a product in its own right. The NPPF also amends the definition of what constitutes ‘affordable housing’ in relation to starter homes. Policies CS1 and CS3 are not sufficiently aligned with these changes or the discount levels now set out for affordable housing. • There are also implications from the re-drafting of the NPPF with respect to the relationship between plan-making and decision-taking. These implications are not reflected in the Core Strategy. Specifically, the revisions set out in paragraph 11 (formerly known as paragraph 14), and the introduction of the “tilted balance” provided by paragraph 11 (c) and (d). The wording in the paragraph has been altered as have the associated footnotes. The paragraph now introduces the concept of “policies which are most important”. Footnote 7 sets out when policies are deemed to be out-of-date for determining applications involving the provision of housing, whilst paragraph 14 sets out the circumstances where the adverse impact of allowing development that conflicts with a neighbourhood plan is likely to significantly and demonstrably outweigh the benefits. • The relationship between neighbourhood plans and the local planning authority’s deliverable land supply/housing delivery is not explained within the Core Strategy, nor are the specific circumstances under which policies will be considered out-of-date.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A2.	There has not been a significant change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux).	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The housing need figure described in Chapter 4 of the Core Strategy and the housing requirement defined in Policy CS1 (820 homes per year) are significantly lower than local housing need figure for Charnwood using the standard methodology. The objectively assessed need figure in the Core Strategy was calculated using evidence from a Strategic Housing Market Assessment produced in June 2014, drawing upon 2011-based projections (extended with a partial return to trends set out in the 2008-based projections).</p> <p>The advent of the standard methodology and the Local Housing Need figure has significantly altered the housing requirement for Charnwood. The Core Strategy housing requirement figure is 13,940 to be delivered between 2011 and 2028. This represents an average housing requirement of 820 dwellings per annum. The standard methodology, using the 2014-based projections and up-to-date affordability ratios, set out a Local Housing Need figure for Charnwood of 1,105 dwellings per annum (at time of writing September 2020).</p> <p>The difference represents 285 dwellings per annum and would equate to a difference of 4,275 dwellings over a minimum 15-year local plan period. This difference is considered to be significant.</p> <p>Government is also consulting on changes to the standard methodology which would see Charnwood’s Local Housing Need figure rise to 1,636 homes per year. Should a revised methodology be adopted, the Local Housing Need figure will represent a further significant change.</p>
A3.	You have a 5-year supply of housing land	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council’s position was published as at the 31st March 2020, and is set out in the “Five Year Housing Land Supply” paper published on the Council’s website https://www.charnwood.gov.uk/files/documents/5_year_supply_31_st_march_2020/5%20Year%20Supply%2031st%20March%202020.pdf</p> <p>The paper demonstrates that there is 5.52 years’ worth of housing land supply in Charnwood.</p> <p>The Core Strategy will become five years old, from the date of its adoption, on the 9th November 2020. This has important implications for the Council’s ability to demonstrate a five-year housing land supply position, and also in terms of being measured against the Housing Delivery Test.</p> <p>Under the terms of the NPPF, and clarified through the PPG, authorities can use the housing requirement figure identified in adopted strategic housing policies where the plan was adopted in the last five years, or the strategic housing policies have been reviewed within the last five years and found not to need updating. In all other circumstances, the five-year housing land supply position will be measured against the area’s local housing need calculated using the standard method. As such, as at 9th November 2020, the Council will be required to use the</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement																										
			<p>Local Housing Need figure for the purposes of calculating its five-year housing land supply position. For clarity, this would mean using the figure of 1,105 dwellings per annum, rather than 820 dwellings per annum and would lead to a housing supply figure of 4.1 years..</p> <p>Similarly, under the terms of the Government’s Housing Delivery Test Measurement Rule Book, where the latest adopted housing requirement figure is over five years old, the method for calculating compliance with the Housing Delivery Test will utilise the minimum annual local housing need figure.</p>																										
A4.	You are meeting housing delivery targets	Agree	<p>The Council’s housing delivery position was clarified as at the 31st March 2020, and is set out in the “Five Year Housing Land Supply” paper published on the Council’s website https://www.charnwood.gov.uk/files/documents/5_year_supply_31_st_march_2020/5%20Year%20Supply%2031st%20March%202020.pdf</p> <p>The paper shows that total completions between 2011 and 2020 are: 7,516 dwellings. This is set against a requirement of 7,380 dwellings. The Council is therefore ahead of target by 136 dwellings.</p> <p>Government published the Housing Delivery Test: 2019 measurement on 13th February 2020. The data records housing delivery performance against requirements over the three-year period 2016/2017, 2017/2018, and 2018/2019. Charnwood’s performance is set out below:</p> <table border="1"> <thead> <tr> <th colspan="3">Number of homes required</th> <th rowspan="2">Total number of homes required</th> <th colspan="3">Number of homes delivered</th> <th rowspan="2">Total number of homes delivered</th> <th rowspan="2">Housing Delivery Test: 2019 measurement</th> <th rowspan="2">Housing Delivery Test: 2019 consequence</th> </tr> <tr> <th>2016-17</th> <th>2017-18</th> <th>2018-19</th> <th>2016-17</th> <th>2017-18</th> <th>2018-19</th> </tr> </thead> <tbody> <tr> <td>760</td> <td>820</td> <td>820</td> <td>2,400</td> <td>943</td> <td>1,107</td> <td>1,117</td> <td>3,167</td> <td>132%</td> <td>None</td> </tr> </tbody> </table> <p>The data shows that Charnwood has consistently met its housing delivery target and has achieved a HDT measurement of 132%.</p>	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2019 measurement	Housing Delivery Test: 2019 consequence	2016-17	2017-18	2018-19	2016-17	2017-18	2018-19	760	820	820	2,400	943	1,107	1,117	3,167	132%	None
Number of homes required			Total number of homes required	Number of homes delivered				Total number of homes delivered	Housing Delivery Test: 2019 measurement	Housing Delivery Test: 2019 consequence																			
2016-17	2017-18	2018-19		2016-17	2017-18	2018-19																							
760	820	820	2,400	943	1,107	1,117	3,167	132%	None																				
A5.	Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets; and (ii)	Disagree	<p>AFFORDABLE HOUSING</p> <p>Performance in delivering affordable housing has been mixed. The target set out in the Core Strategy is to deliver 700 affordable housing dwellings by April 2016; 1,900 by April 2021; 2,700 by April 2026; and 3,060 by April 2028.</p> <p>Progress against target delivered a surplus of 88 affordable homes by April 2016. 189 affordable homes were completed in 2018/2019, which means that supply remains on track, although below the required trajectory. In total, 1,410 affordable homes have been delivered up to 31st March 2019</p> <p>EMPLOYMENT LAND, COMMERCIAL FLOORSFACE, AND JOBS</p>																										

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	commercial floorspace/jobs targets over the remaining plan period.		<p>Delivery is significantly below the policy objectives set out in the Core Strategy.</p> <p>Policy CS6 sets out a target of delivering 75 hectares of employment land by 2028. A significant proportion of this employment land is allocated as part of sustainable urban extension at north of Birstall, northeast Leicester, and West of Loughborough and Watermead Regeneration Corridor. Delays in the overall progress of these sites, together with the phased release of employment land, means that land is unlikely to become available until later in the plan period. Progress against target shows that 10.38 hectares have been completed up to 31st March 2019. Annual delivery is averaging 1.76 hectares. Projected forward this would yield a further 14.08 hectares of employment land, taking the total to 24.46 hectares. This would represent less than half of the policy requirement If strategic sites are not developed.</p> <p>Policy CS6 does not set out a specific job requirement, however the objectively assessed needs are predicated on delivering 12,000 jobs over the plan period. The monitoring framework for Policy CS6 records a target of 12,000 jobs. The AMR records that 4,000 new jobs have been created up to 31st March 2017.</p> <p>Policy CS9 sets out a target of 32,800 - 41,600 sqm net of new comparison retail floorspace by 2028; 8,800 sqm net of new convenience retail floorspace by 2028; and 9,600 sqm net of commercial leisure floorspace by 2028. Delivery against target shows that 8,207 sqm comparison retail floorspace at 31st March 2019; 12,730 sqm convenience retail floorspace at 31st March 2019 and 10,353 sqm commercial leisure floorspace at 31st March 2019.</p> <p>Convenience and commercial leisure requirements have been met early in the plan period. However, comparison retail floorspace requirements are below trajectory.</p>
A6.	There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Whilst there are no local significant changes in the economic conditions which could challenge the delivery of housing in the Plan, the economic effects of the Coronavirus pandemic, plus wider societal changes including an increase in online shopping, homeworking and changes to the economic landscape are not reflected in the Core Strategy.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A7.	There have been no significant changes affecting viability of planned development.	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Evidence from the Charnwood Housing Delivery Scenarios – Markets Impact Assessment (December 2017) and Affordable Housing Viability Assessment (2018) indicate that overall viability levels remain positive and the market for delivering development in Charnwood remains positive.</p>
8.	Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The five strategic development proposals set out in the Core Strategy are progressing but behind schedule in terms of delivery. This puts pressure on other locations to accommodate development, which is not in accordance with the spatial strategy set out in Policy CS1.</p> <p>It is anticipated that the three SUEs will deliver some dwellings within the Core Strategy plan period, but also that delivery will extend beyond the Plan’s timeframe.</p> <p>It is not clear that the Direction of Growth at Watermead Regeneration Corridor, and the Loughborough University Science and Enterprise Park will be completed during the Core Strategy plan period.</p> <p>In addition, there are sites which feature as part of plans to regenerate the towns of Loughborough, which have not progressed at the pace expected. The Opportunity site at Devonshire Square within Loughborough Town Centre has not moved forward due to viability issues, the market for certain types of development, and the level of investment required.</p>
A9.	There have been no significant changes to the local environmental or heritage context which have implications for the local plan	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>At a strategic level there appears to be no major changes to statutory designations, or the classification/status of assets that would have a material effect on the local plan’s approach, or policies.</p> <p>However, there are contextual and local changes that have a bearing on policymaking. Charnwood now has five ‘made’ neighbourhood plans (NPs), each of which considers local assets and matters such as local designations. The NPs have also produced local evidence that may alter the perspective on how impacts and effects should be considered; for example, local views and locally listed assets. A new SSSI has been identified in Woodhouse parish.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	approach or policies.		
A10.	There are no new sites that have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated.	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council has prepared updates to the Strategic Housing and Employment Land Availability Assessment (SHELAA) since the adoption of the Core Strategy.</p> <p>The additional evidence has highlighted that there are new sites that have become available since the adoption of the Core Strategy. The Core Strategy's approach focuses most development in the Leicester urban area, Loughborough and Shepshed, and the Service Centres.</p> <p>During implementation of the Core Strategy, there has been greater demand for development in the Service Centres, and in other smaller locations across the borough.</p> <p>In addition, the SHELAA has highlighted that there are alternative sites on the periphery of Loughborough, Shepshed, and the Service Centres; and other sites, including for new settlements and large-scale developments adjacent to small villages that could feature as part of a different development strategy.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement																								
A11.	Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Appendix 2 of the Core Strategy identifies the infrastructure requirements that are needed to support the delivery of the development strategy.</p> <p>Most of the items are deemed to be ‘essential’ infrastructure, and therefore due to their fundamental importance to the plan have either been secured or delivered. Most of the essential infrastructure items are linked to the delivery of the five strategic development sites, and, in particular, the three SUEs which all have planning permission and Section 106 agreements signed or close to being signed to secure the delivery of the necessary infrastructure.</p> <p>Major road-based infrastructure improvements to the strategic highway network have been secured. Upgrades to M1 Junction 23 and the A512 are currently being completed.</p>																								
A12.	All policies in the plan are achievable and effective including for the purpose of decision-making.	Agree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Core Strategy’s policies have been successfully implemented through the decision-making process. Performance against the Core Strategy’s targets would indicate that the policies are effective and can be understood by applicants, Officers, and Elected Members.</p> <p>In the year April 2019 to March 2020, the Council’s performance at appeals was positive, indicating that the policy framework for decision-making remains fit for purpose. The number of appeals decided, and the number / percentage allowed is set out below:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="4" style="text-align: center;">s78 planning appeals</th> </tr> <tr> <th style="text-align: center;">number decided</th> <th style="text-align: center;">number allowed</th> <th style="text-align: center;">split decision</th> <th style="text-align: center;">% allowed</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">29</td> <td style="text-align: center;">5</td> <td style="text-align: center;">1</td> <td style="text-align: center;">17%</td> </tr> </tbody> </table> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th colspan="4" style="text-align: center;">Householder appeals</th> </tr> <tr> <th style="text-align: center;">number decided</th> <th style="text-align: center;">number allowed</th> <th style="text-align: center;">split decision</th> <th style="text-align: center;">% allowed</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	s78 planning appeals				number decided	number allowed	split decision	% allowed	29	5	1	17%	Householder appeals				number decided	number allowed	split decision	% allowed				
s78 planning appeals																											
number decided	number allowed	split decision	% allowed																								
29	5	1	17%																								
Householder appeals																											
number decided	number allowed	split decision	% allowed																								

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement											
			5	0	0	0%								
s174 enforcement notice appeals														
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th data-bbox="562 352 763 443">number decided</th> <th data-bbox="763 352 965 443">notice upheld or varied</th> <th data-bbox="965 352 1167 443">split decision</th> <th data-bbox="1167 352 2123 443">% quashed or granted</th> </tr> </thead> <tbody> <tr> <td data-bbox="562 443 763 491" style="text-align: center;">1</td> <td data-bbox="763 443 965 491" style="text-align: center;">1</td> <td data-bbox="965 443 1167 491" style="text-align: center;">0</td> <td data-bbox="1167 443 2123 491" style="text-align: center;">0%</td> </tr> </tbody> </table>							number decided	notice upheld or varied	split decision	% quashed or granted	1	1	0	0%
number decided	notice upheld or varied	split decision	% quashed or granted											
1	1	0	0%											

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A13.	There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>The Council, as part of the Duty to Co-operate, is liaising with neighbouring local authorities to understand their plans, understand the growth pressures across the Housing Market Area and Functional Economic Market Area, and to consider the impacts on individual development plans. A Statement of Common Ground between Leicestershire authorities will be prepared and signed for each respective local authority to use whilst preparing and finalising their development plans. The first of these was prepared, signed and published in November 2019 to support the Partial Review of the North West Leicestershire Local Plan.</p> <p>On 28th November 2019, Leicester City Council formally declared an unmet housing need of 7,813 dwellings and have since declared an unmet employment need of 23ha. The authorities in the Housing Market Area/Functional Economic Market Area are working together to explore and test options for meeting unmet housing and employment need arising from Leicester City and intend to prepare a Statement of Common Ground on an agreed approach.</p>
A14.	There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.	Disagree	<p>Reason (with reference to plan policies, sections and relevant evidence sources):</p> <p>Since the adoption of the Core Strategy the Council has created a series of new corporate strategy documents to better reflect:</p> <ul style="list-style-type: none"> i) the financial context that the Council now operates; ii) the Council's forward-looking approach to customer-service, delivery, resilience, and performance; iii) the ambitions and objectives that the Council wishes to explore – e.g. economic development, regeneration, and climate change; iv) the partnership arrangements that have been established – with the businesses, residents, organisations such as the LEP, Loughborough University, LLFAs etc. <p>Specific corporate strategy documents that have been prepared since the Core Strategy was adopted and have an influence on the development plan, include the:</p> <ul style="list-style-type: none"> a) Carbon Management Plan 2015-20; b) Communications Strategy 2017-21; c) Housing Strategy 2015-2020;

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
			<p>d) Transformational Government Strategy; and the e) Tenancy Strategy 2012-2017</p> <p>More specifically, the Council has made a series of recent announcements and declarations that have an effect on future policymaking. These include:</p> <ul style="list-style-type: none"> • Becoming carbon neutral by 2030; and • A commitment to plant 10,000 trees in the next five-years. <p>The Council has also recently appointed a new Director of Commercial Development. As part of a planned Investment Strategy the Council is committed to becoming a more commercial and entrepreneurial organisation. The role will be essential in supporting the Councils efforts on economic, community and organisational recovery. A specific focus on the Council's own assets and buildings will be an early priority.</p> <p>The Council has, along with other Leicestershire authorities, signed up to develop the concept for an East Midlands Combined Authority. Working through via the Northern Leicestershire Strategic Alliance, which will include Melton, Charnwood and North West Leicestershire, the Councils will explore a devolution framework and appropriate governance arrangements.</p> <p>The political, policy, and corporate context has evolved significantly since the Core Strategy was adopted. Given the current economic consequences of the Coronavirus pandemic, it is likely that the context will change substantially in the short to medium term.</p>
	ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES		YES/NO (please indicate below)
A15.	You AGREE with <u>all</u> of the statements above	No	<p><u>If no go to question A16.</u></p> <p>If yes, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above.</p>

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement	
				Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.
A16.	You DISAGREE with one or more of the statements above and the issue can be addressed by an update of local plan policies		Yes	If yes, based on the above provide a summary of the key reasons <u>why</u> an update to plan policies is necessary in section A17 below and complete Section B below.
A17.	<p>Decision: Update plan policies / No need to update plan policies (delete as necessary)</p> <p>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</p> <ul style="list-style-type: none"> • New NPPF requirements which need to be addressed; • Advent of Neighbourhood Planning, which alters the policy-making context; • Significant change in the Local Housing Need for the Borough; • Leicester City have unmet housing and employment needs; • Not delivering sufficient employment land in accordance with trajectory; • Changes to economic conditions • Significant new sites being promoted which have not been assessed; • SUEs have been slow to deliver with the development strategy under pressure from unplanned development; • New Corporate Strategy and local manifesto e.g. tree planting, climate change. 			
	B. POLICY UPDATE FACTORS		YES/NO (please indicate below)	Provide details explaining your answer in the context of your plan / local authority area

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement	
B1	Your policies update is likely to lead to a material change in the housing requirement which in turn has implications for other plan requirements / the overall evidence base.		Yes	The Core Strategy sets out a housing requirement of 820 dwellings per annum. The standard methodology, using the 2014-based projections and up-to-date affordability ratios, set out a Local Housing Need figure for Charnwood of 1,105 dwellings per annum (at time of writing September 2020). The policies update needed will involve a material change to the housing requirement for the Borough.
B2	The growth strategy and / or spatial distribution of growth set out in the current plan is not fit for purpose and your policies update is likely to involve a change to this.		Yes	The spatial distribution strategy that focuses development in the urban areas of Leicester, Loughborough and Shepshed remains broadly appropriate and represents a model which can realise sustainable development. However, there is increasing recognition that a range of site sizes in a variety of locations is needed to ensure there is a robust trajectory of deliverable sites, and to ensure that the overall strategy is deliverable. The policies update needed will involve a material change to the growth strategy for the Borough.
B3	Your policies update is likely to affect more than a single strategic site or one or more strategic policies that will have consequential impacts on other policies of the plan.		Yes	A comprehensive revision to the policy framework is required, working from the strategic perspective (scale of growth, infrastructure requirements, portfolio of large, medium and small-scale sites), through to more thematic policies, such as providing an up-to-date policy approach for affordable housing, design, town centres, retail, and renewable energy. Changes to both the strategic policies and thematic policies will affect more than one site and have a series of consequential impacts on other policies in the plan.
	You have answered yes to one or more questions above.		Yes	You are likely to need to undertake a full update of your spatial strategy and strategic policies (and potentially non-strategic policies). Use your responses above to complete Section B4.

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
	<p>You have said no to <u>all</u> questions (B1 to B3) above</p>		<p>N/A</p> <p>If you are confident that the update can be undertaken without impacting on your spatial strategy and other elements of the Plan, you are likely to only need to undertake a partial update of policies. Complete Section B4 to indicate the specific parts / policies of the plan that are likely to require updating based on the answers you have given above.</p>
B4	<p>Decision: Full Update of Plan Policies</p> <p>Reasons for scope of review:</p> <ul style="list-style-type: none"> • A material change to the housing requirement and a renewed focus on the Duty to-Co-operate with the localised issue of the City of Leicester’s unmet housing need; • The growth strategy and the distribution strategy require refinement; and • A number of strategic policies will need to be updated to reflect the change in the scale of growth and the spatial distribution strategy. In addition, thematic-based policies will need to be refined to take account of the new requirements set out by national policy (NPPF) and the need to refine the policy relationship between national – local – neighbourhood plans. 		

Date of assessment:	September 2020
Assessed by:	Clare Clarke, Group Leader Plans, Policies and Place-Making
Checked by:	Richard Brown, Team Leader Local Plans
Comments:	