



*Meeting:* **Cabinet**

*Date/Time:* **Friday, 13 September 2024 at 11.00 am**

*Location:* **Sparkenhoe Committee Room, County Hall, Glenfield**

*Contact:* **Miss G. Duckworth (Tel. 0116 305 2583)**

*Email:* **[gemma.duckworth@leics.gov.uk](mailto:gemma.duckworth@leics.gov.uk)**

### **Membership**

Mrs D. Taylor CC (Chairman)

Mr. N. J. Rushton CC    Mr J. Poland CC  
Mr. R. Ashman CC    Mrs. P. Posnett MBE CC  
Mr. L. Breckon JP CC    Mrs. C. M. Radford CC  
Mr. O. O'Shea JP CC    Mrs H. L. Richardson CC  
Mr. B. L. Pain CC

### **SUPPLEMENTARY AGENDA**

<u>Item</u>	<u>Report by</u>	
13. Response to the Hinckley and Bosworth Regulation 18 Draft Local Plan Consultation (July 2024).	Chief Executive	(Pages 3 - 72)



This page is intentionally left blank



## **CABINET – 13 SEPTEMBER 2024**

### **RESPONSE TO THE HINCKLEY AND BOSWORTH REGULATION 18 DRAFT LOCAL PLAN CONSULTATION (JULY 2024)**

#### **REPORT OF THE CHIEF EXECUTIVE**

##### **PART A**

###### **Purpose of the Report**

1. The purpose of this report is to advise the Cabinet on the content of Hinckley and Bosworth Borough Council's (Hinckley and Bosworth BC's) new draft Local Plan consultation and to seek approval for the proposed response as the views of the County Council.
2. The detailed comments are set out in the appendices to this report, whilst the main response and key comments are highlighted in paragraphs 39 to 91 below.

###### **Recommendation**

3. It is recommended that:
  - a) the County Council's response to Hinckley and Bosworth Borough Council's new draft Local Plan consultation, set out in paragraphs 39 to 91, and the appendices to this report be noted and approved;
  - b) the Cabinet notes the significant challenges and uncertainties local plan making is increasingly facing in Leicestershire, particularly in respect of reliance on interventions on the Strategic Road Network, and notes the ongoing commitment to work to resolve these;
  - c) the Chief Executive, following consultation with the Leader, be authorised to make any further amendments to the detailed response in alignment with the agreed overarching response prior to submission before the end of the consultation period on 27 September 2024.

###### **Reasons for Recommendation**

4. The response sets out key comments for consideration by Hinckley and Bosworth BC as it continues to develop its new Local Plan. It seeks to ensure alignment with the outcomes of the County Council's Strategic Plan and the

Leicester and Leicestershire Strategic Growth Plan (SGP), and to influence the content of the Local Plan in the interests of local communities, including to ensure that the Local Plan provides as robust as possible policy framework for securing the provision of the infrastructure and services required to support its successful delivery.

5. Increasingly the challenges and uncertainties are causing delays which are impacting on the delivery of housing and economic growth.
6. To enable amendments to be made which would strengthen the County Council's response to the current consultation.

### **Timetable for Decisions (including Scrutiny)**

7. The County Council's consultation response is required to be submitted to Hinckley and Bosworth BC ahead of the close of consultation on 27 September 2024.

### **Policy Framework and Previous Decisions**

8. In 2018, the County Council, Leicester City Council, the seven district councils in Leicestershire, and the Leicester and Leicestershire Enterprise Partnership, (LLEP) approved the Leicester and Leicestershire Strategic Growth Plan (SGP) which provides the long-term vision for planned growth for the area up to 2050. With particular regard to Hinckley and Bosworth, the SGP identifies the A5 as an Improvement Corridor and in addition, Hinckley (alongside the towns of Coalville, Loughborough, Lutterworth, and Market Harborough) is identified as an Area of Managed Growth where growth will be managed through Local Plans.
9. In March 2019, the County Council responded to Hinckley and Bosworth BC's Local Plan Review: New Directions for Growth. A number of concerns were raised, including about the lack of consultation with the County Highway Authority and insufficient reference to the policy framework provided by the agreed SGP.
10. The Leicester and Leicestershire Strategic Transport Priorities (LLTSTP) was approved by the Cabinet in November 2020. This document has a plan period to 2050 and was developed by the County and City Councils, alongside the SGP, to ensure the long-term development needs and associated transportation requirements are co-ordinated.
11. In 2021, the County Council and its partners (Leicester City Council, the seven district councils and the LLEP), commissioned the Leicester and Leicestershire Housing and Economic Needs Assessment (HENA). The HENA, published in June 2022, provides evidence that across Leicester and Leicestershire, the projected housing need from 2020 to 2036 is 91,400 dwellings and employment land need from 2021 to 2036 is 344 hectares.

12. In September 2021, the County Council responded to Hinckley and Bosworth BC's draft Local Plan (Regulation 18) consultation and expressed the need for closer partnership working with Hinckley and Bosworth BC across key disciplines and at a senior officer level in recognition of:
  - the challenges presented by the Strategic Road Network (SRN) in the Borough and wider area;
  - the lack of capacity on the Local Road Network;
  - the need to take a strategic approach to education and other infrastructure provision; and
  - the need to secure deliverable planned growth supported by infrastructure rather than 'unplanned' speculative development.

The report noted that, at that time, the level of partnership working needed to understand the strategy of the proposed Local Plan, how it would be delivered and how the impacts would be mitigated, had not been achieved. It further set out that the County Council was of the view that in order to achieve the required level of partnership working, a revised timetable would be needed (and agreed with relevant stakeholders) to build in time for appropriate dialogue and to share and consider technical evidence.
13. In October 2021 the Cabinet considered a further report regarding Hinckley and Bosworth BC's emerging Local Plan. The Cabinet agreed that the County Council would continue to work with the Borough Council to develop a Local Plan that was sound and deliverable, but that if Hinckley and Bosworth BC decided to publish a Regulation 19 Local Plan that did not satisfactorily address the County Council's concerns, it would raise a formal objection as part of the consultation process, and at Examination in Public.
14. In December 2021, the County Council became a signatory to a Statement of Common Ground (SoCG) relating to South Leicestershire Local Plan Making, aligning the gathering of evidence and activity in the development of new local plans for three districts in the south of the County.
15. The Council's Strategic Plan (2022 to 2026) has five strategic outcomes, including 'Strong Economy, Transport and Infrastructure' and a 'Clean, Green Future' to ensure Leicestershire has the infrastructure to meet the demands of a growing population, whilst looking to tackle climate change, biodiversity loss and unsustainable resource usage.
16. In February 2022 the Cabinet authorised the Chief Executive, following consultation with the Lead Cabinet Member, to submit comments on behalf of the County Council, prior to the end of the Hinckley and Bosworth BC Regulation 19 Local Plan consultation period. The report reiterated that to date, insufficient evidence had been provided to demonstrate that the Local Plan meets the tests of soundness as set out in the National Planning Policy Framework (NPPF) and as a result, this was likely to form the basis of the County Council's response.
17. In May 2022, the Cabinet noted with concern the increasing pressures on the County Council's Capital Programme relating to infrastructure required to support housing and economic growth in the delivery of planned growth. The

report set out some of the elements required to manage the financial risk to the Council.

18. In September 2022, the County Council became a signatory to a SoCG relating to Housing and Employment Land Needs in Leicester and Leicestershire, setting out how the City Council's identified unmet needs would be accommodated in the County. Hinckley and Bosworth BC approved the SoCG at its Council meeting in January 2024.
19. In November 2022, the Cabinet received a paper setting out the financial implications for the Council of delivering sustainable and inclusive growth and agreed the approach and principles the Council would adopt to address and manage these risks.

### **Resource Implications**

20. There are no resources implications arising from the recommendations in this report. The Council has committed significant resources to engaging in and supporting a collaborative approach to strategic planning, which is intended to facilitate the delivery of growth within the County and mitigate the negative impacts of development.
21. The Council's current Capital Programme includes over £200m to fund infrastructure projects that support growth in the County.
22. Delivering infrastructure (highways, schools, and some community facilities) has in the past required significant Council forward-funding. In the current financial climate this approach is no longer possible.

### **Circulation under the Local Issues Alert Procedure**

23. This report will be circulated to all Members.

### **Officers to Contact**

Zafar Saleem  
Assistant Chief Executive  
Tel: 0116 305 4952 Email: [zafar.saleem@leics.gov.uk](mailto:zafar.saleem@leics.gov.uk)

Julie Thomas  
Head of Planning and Historic and Natural Environment  
Tel: 0116 305 5667 Email: [julie.thomas@leics.gov.uk](mailto:julie.thomas@leics.gov.uk)

## **PART B**

### **Background**

24. The preparation of Local Plans involves various stages of consultation. This consultation from Hinckley and Bosworth BC is known as a 'Regulation 18' consultation and builds on four previous rounds of publication consultation to develop the new Plan, these being:
- Regulation 18 – Scope Issues and Options (2018)
  - Regulation 18 – New Directions for Growth (2019)
  - Regulation 18 – Local Plan Consultation (2021)
  - Regulation 19 – Pre-submission consultation (2022).
25. The Council formally responded to Hinckley and Bosworth BC at each of these four prior consultation stages and concluded that insufficient evidence had been provided to demonstrate that the Local Plan met the required tests of soundness. Following the conclusion of the Regulation 19 consultation in 2022 Hinckley and Bosworth accepted that submission of a sound plan in line with published timescales was not possible due to a series of issues including:
- The Office for National Statistics releasing a data update for 'Housing Affordability in England and Wales: 2021'
  - The quantum of unmet need from Leicester City being finalised
  - The Borough Council becoming one of 42 councils advised by Natural England that it would be affected by nutrient neutrality requirements.
  - Changes to the housing need the Borough Council had to plan for having a consequential impact on the evidence which needs to be gathered and tested to ensure that sites are capable of delivering the future land requirements to meet the identified need.
  - The passing of the Levelling Up and Regeneration Act 2023
  - The introduction of Biodiversity Net Gain requirements
26. Hinckley and Bosworth BC has revisited the proposed Local Plan evidence base to ensure that it remains relevant and appropriate in informing the Local Plan. Emerging indications from the evidence work and other considerations have demonstrated that the current development strategy of a 70/30% urban/rural split for new growth may not be deliverable. Hence, this new consultation builds on previous consultations and seeks to incorporate views received and new evidence collected.
27. Comments received will inform the Borough Council's policy recommendations ahead of a Pre-Submission Consultation known as a 'Regulation 19' which is anticipated to be undertaken in late 2024/early 2025. Submission of the Plan to the Planning Inspectorate is anticipated by the end of June 2025. This timeframe may be subject to change in the light of the National Planning Policy Framework Proposed Changes (currently being consulted on by Government until 24 September 2024). The County Council's response to the NPPF Proposed Changes is to be considered by Cabinet on 13 September 2024.

28. The adopted Hinckley and Bosworth Local Plan consists of the Core Strategy (2009), Hinckley Town Centre Area Action Plan (2011), Earl Shilton and Barwell Area Action Plan (2014) and Site Allocations and Development Management Policies (2016).
29. The Levelling Up and Regeneration Act 2023 received Royal Assent in October 2023. However, a number of provisions within the Act require secondary legislation that has yet to come forward. Under the existing arrangements local planning authorities have until 30 June 2025 to submit Local Plans.
30. At the end of July 2024 the new government announced planning reforms which include an outline of transitional arrangements for local plan-making within the current National Planning Policy Framework Proposed Changes consultation. Discussions have been taking place with the Leicestershire district councils and Leicester City Council regarding the likely routes their respective emerging Local Plans will take. The route is less than clear for the majority of Leicestershire districts, including Hinckley and Bosworth BC, and further clarity is expected over coming weeks as consideration is undertaken by district councils following liaison with the MHCLG. Members will be informed as more certainty is secured.

### **Duty to Cooperate**

31. It is recognised that should a Housing Market Area (HMA) authority identify, quantify and provide robust evidence to demonstrate an unmet need, it is incumbent upon the HMA authorities to jointly resolve any cross-boundary matters with HMA partners under the Duty to Cooperate, set out in the Localism Act 2011 and National Planning Policy Framework (NPPF) (December 2023). The duty remains in place until such point Government determines otherwise.
32. Without a clear aligned approach to delivery, Leicestershire faces high levels of speculative/indiscriminate development with the consequent high risk of inadequate highway and education infrastructure provision. To avoid this, ongoing commitment from all the local authorities to joint working is crucial, as is their support for a collaborative and coordinated approach to defining and allocating infrastructure funding requirements of Local Plans.
33. The SoCG relating to Housing and Employment Land Needs (June 2022) for the Leicester and Leicestershire area was guided by the (officer) Strategic Planning Group and Members' [Planning] Advisory Group which consisted of representatives from the County Council, Leicester City Council, and the seven district councils. The SoCG sets out the City Council's identified unmet need of 18,700 homes and 23 hectares of employment land for the period 2020-2036 to be accommodated in the County. The SoCG was agreed by all partner authorities.
34. The Charnwood Local Plan 2021-2037 Examination is ongoing, however Inspectors confirmed in writing that they have "no reason to disagree with the HENA's [Housing and Economic Needs Assessment] conclusion that the



standard method establishes a minimum local housing need of 91,408 dwellings across the Housing Market Area (HMA) to 2036...Based on the evidence at this stage and pending further testing of housing delivery through the Leicester Local Plan Examination, we consider that a figure of 18,700 dwellings represents a reasonable working assumption for the scale of Leicester's unmet housing need from 2020 – 2036.”

35. Hinckley and Bosworth BC has decided to adopt the housing figures contained in the agreed SoCG as the basis for the housing requirement in its Local Plan (13,862 dwellings over the plan period, equivalent to 660 dwellings per annum).

### **Consultation on the Hinckley and Bosworth Local Plan**

36. This consultation, which was opened by Hinckley and Bosworth BC on 31 July 2024, is the fifth consultation in preparing the new Hinckley and Bosworth Local Plan. It intends to provide consultees the opportunity to consider and comment on a number of planning issues and proposed options for the future development of the Borough.
37. The new Local Plan is proposed to cover the period from 2020 to 2041. This is to ensure it will meet the requirement of national planning policy to cover a period of at least 15 years from its adoption (currently scheduled for 2026) to the end of the plan period.
38. The consultation seeks comments on the emerging position with the focus on strategic local planning issues. Non-strategic development allocations and non-strategic planning policies will follow in the Regulation 19 draft-submission version of the plan, currently expected in Winter 2024/2025.

### **Proposed Response to the Consultation**

39. The County Council welcomes the opportunity to comment on Hinckley and Bosworth's Local Plan Regulation 18 consultation. The County Council considers that a successfully adopted Local Plan is in the best interests of supporting long-term, sustainable growth across Leicester and Leicestershire.
40. The continued close working that Hinckley and Bosworth BC has with other partners in the Leicester and Leicestershire Housing Market Area is recognised and supported, and this will need to continue to enable the ongoing preparation and successful adoption of the local plan.
41. The proposed comments of the County Council to the consultation are set out in Appendix A to this report, the overarching response which includes key comments from transport as the Local Transport Authority (LTA) and a summary of other key comments are set out below. Appendix B contains advice previously provided by transport for further consideration in the plan making process.

### **Overarching response**

42. There are a number of significant factors, some of which are beyond either the LTA's or district council's control, that affect the Local Plan from a transport perspective. These are set out in the following paragraphs.

43. **Current position with regard to the development of transport evidence:** In the Authority's response to an earlier Regulation 19 version of the Plan (considered by the Cabinet in March 2022) the following was included:

*“For Local Plans to be ‘justified’ they need to be based on an appropriate strategy, taking into account reasonable alternatives and based on proportionate evidence. Given the Plan has no underpinning transport evidence base (the preferred housing strategy has not been modelled in transport terms), the present transport policies are generic, and no Infrastructure Delivery Plan has been prepared at this time. It is therefore not possible for the Local Highway Authority (LHA) to be able to determine the nature of highways and transport measures and the infrastructure required to enable the Local Plan's delivery, nor to understand whether the costs of such can be funded or to what extent a funding gap might exist. As such the Local Plan cannot be described as being justified.”*

44. Since then, the district council has become a fully-fledged participant in the South Leicestershire Joint Transport Evidence (JTE) work<sup>1</sup>. This is in lieu of Plan-specific transport work and is an approach strongly supported by the LTA as the best approach to identify the cumulative (including cross-boundary) transport impacts and strategic mitigation requirements arising from the district's emerging Local Plan in combination with other emerging Local Plans across the South Leicestershire area.

45. However, the JTE work has not yet reached a sufficiently advanced stage to enable its key findings to inform the development of relevant, crucial components of the Local Plan, in particular:

- i) Policies and supporting text;
- ii) The Infrastructure Delivery Plan/Schedule; and
- iii) Associated further evidence: e.g. topic papers and viability work.

46. The JTE work is not yet at a sufficiently mature stage to provide a robust basis for the submission of a Local Plan for examination in public. Furthermore, it will be important to agree a consistent/aligned evidential and policy approach across the four South Leicestershire district councils, with the support of key partners, including National Highways (NH), Leicester City Council and Warwickshire County Council (WCC).

---

<sup>1</sup> The JTE has its genesis in the completion of the South Leicestershire Local Plan Making Statement of Common Ground, which the Cabinet agreed the County Council to become a signatory to in [December 2021](#). It is a joint exercise between Hinckley and Bosworth Borough Council, Harborough District Council, Blaby District Council and Oadby and Wigston Borough Council. Through this work, LTA officers are providing support and assistance to district councils in assessing options for growth across south Leicestershire.

47. The district council has (along with the other JTE authorities) been working to develop and submit a Local Plan for Examination ahead of the Levelling Up and Regeneration Act's June 2025 deadline for Plans to be prepared in accordance with the current *plan-making* system.
48. The LTA already considered that even this timetable was extremely challenging for completing the JTE; should, in response to the Government's recently published draft planning reforms<sup>2</sup>, the district council decide to further 'accelerate' the timetable for publishing and submitting a Local Plan for Examination in Public (EiP), it is difficult to foresee how completion of the JTE work could be accommodated without foregoing key elements thereof.
49. Where the development of a Plan's evidence base is insufficiently complete at the time of its submission for Examination, this brings risks that further evidential work could:
- Result in the necessity to make subsequent substantial modifications to the Plan as submitted;
  - Have implications for the Plan's viability; and
  - Give rise to other issues that affect the Plan's 'soundness'.
50. **Other, wider unknowns/uncertainties** Added to the uncertainties arising from the Government's proposed planning reforms, there are currently two other major factors that will affect the ability to submit a Plan for EiP by June 2025 (or any sooner):
- i) *Impending Hinckley National Rail Freight Interchange (HNRFI) Development Consent Order (DCO) decision.* If a DCO is granted (the Secretary of State for Transport (SoST) decides to grant consent for this Nationally Significant Infrastructure Project), it will have a direct transport impact in terms of the substantial additional traffic generated by the HNRFI and the congestion caused on the Borough's road network and more widely across Leicester and Leicestershire (including at M1 Junction 21). A decision is expected by the SoST on or before 10 September 2024.

It would also have significant implications for the scale of strategic B8 employment requirements in the Borough and neighbouring districts, i.e. differing levels of requirement, by quantum and spatial distribution, which would also have transport impacts in terms of giving rise to differing effects on travel distribution and traffic impact patterns in and around the Borough and more widely.

Furthermore, it could have implications for the Plan's housing spatial strategy, in terms of a greater emphasis to co-locate housing for improved active and sustainable transport connectivity opportunities in the Hinckley urban area within the Borough.

---

<sup>2</sup> Including proposed revisions to the National Planning Policy Framework and reinstatement of mandatory housing targets – see report elsewhere on the agenda.

It is acknowledged that the current stage of the JTE work will be considering how the granting of a DCO for the HNRFI may impact this (and the other JTE authorities') emerging Plan(s) in transport terms. However, until a decision is made by the SoST the LTA will be unable to advise the district council (and other JTE authorities) on how the findings of such work should be reflected in the Plan (e.g. through the transport mitigation strategy and relevant policies), nor whether and how best to progress with any further stages of the JTE work.

- ii) *Unclear position regarding future investment in the Strategic Road Network (SRN).* The immediate actions taken by the current Government to address a spending gap in the national finances (identified by a commissioned Treasury audit) include the scrapping of two SRN schemes<sup>3</sup>. The Chancellor has also made clear that further actions are required to identify more savings to the national budget. The extent to which this might impact on funding available to invest in improvements to the SRN is unclear at present.

Even before the Chancellor's recent actions, the Road Investment Strategy (RIS) process<sup>4</sup> was being affected by programme/scheme slippage (from RIS period 1 and RIS period 2). There were already significant doubts as to whether any monies would be available to enable new projects to enter the RIS process, let alone to fund all schemes in the current programme.

Whilst the A5 Tamworth to Hinckley and M1 Leicester Western Access (M1 Junction 21 to 21a) have featured as RIS3 pipeline schemes, National Highways has always made clear that (even prior to the Chancellor's recent announcements), this was no guarantee of any eventual schemes being delivered. In any event, National Highway's work on the pipeline schemes has long since appeared to have stalled.

However, from emerging initial evidence, including from sources such as the JTE work and in respect of the HNFRI, it is clear to the LTA that the delivery of future housing and economic growth in the south of the County (and indeed more widely, including in the north of the County of Warwickshire) is reliant on strategic solutions to current problems on the A5, at the very least at the Dodwells to Longshoot junction. In the absence of such, the LTA would otherwise consider the impacts of growth to be severe, contrary to the National Planning Policy Framework. This is a position shared by Warwickshire County Council as the LTA for its administrative area.

But, given the significant uncertainties surrounding future investment in the SRN, the LTA has no confidence at this time that there is a way to deliver solutions to the A5 that would be deliverable within the Local Plan's timeframe.

---

<sup>3</sup> A303 Stonehenge Tunnel and A27 Arundel Bypass.

<sup>4</sup> The Road Investment Strategy process is the process by which decisions are made about investments to maintain and improve the Country's Strategic Road Network. Funding is awarded in five year periods, with RIS 1 running from 2105 to 2020; RIS2 from 2020 to 2025; RIS3 has hitherto been planned to cover 2025 to 2030.

51. To conclude on this particular key comment, providing that:

- National Highways is prepared to engage meaningfully in a truly supportive way in the Local Plan's development and to commit to support its delivery; and also
- providing that National Highways is enabled to do so by the Department for Transport,

ultimately it should prove possible to identify an overall package of strategic transport interventions required to the SRN to enable growth in the Borough. But, at this time there are too many unknowns and uncertainties and as a result, the LTA is not presently in a position to say that the Local Plan would be sound from a transport perspective.

52. However, given its in principle support for the development and successful adoption of Local Plans, the LTA will seek to work in partnership with the district council and others, including Warwickshire County Council, to engage with National Highways to agree the way to enable the Local Plan to be moved forward, and most crucially once adopted, that its allocated sites are delivered in practice; i.e. delivery is not stalled by further indecision and delays in making the necessary improvements to the A5.

53. The LTA recognises the importance of enabling sustainable development both through the local planning process and development management. Similar to many areas of Leicestershire, Hinckley and Bosworth has several planning applications at various stages that are related to strategic infrastructure solutions to the highways and transport challenges identified in this report, but that may progress ahead of the local plan adoption. Therefore, Leicestershire County Council as the LTA is already working with partners to identify solutions to enable sustainable development to come forward in alignment with strategic aims for the longer term.

54. **Issues regarding proposed allocation sites:** In particular with regard to:

- i) *Lindley Meadows:* A proposed allocation of up to 3000 dwellings (1000 to be delivered in the Plan period) on land between MIRA and Fenny Drayton. Aside from the A5 issue, the LTA questions the active and sustainable travel credentials of this proposed allocation. Geographically, the site is poorly located in terms of accessibility by modes other than private car. Furthermore, the [Strategic Growth Options and Constraints Mapping for Leicester and Leicestershire](#) (SGO) indicates that even a "co-dependent"<sup>5</sup> new settlement needs to be in excess of 5,000 dwellings.
- ii) *Barwell and Earl Shilton Sustainable Urban Extensions (SUEs):* Notwithstanding the considerable level of resources that the LTA has committed to seeking to support the delivery of these two SUES since they

---

<sup>5</sup> The SGO describes that co-dependent settlements are close to existing settlements, and well connected by public transport, walking and cycling.

were first allocated in 2009, the LTA questions the extent to which the Plan continues to 'double down' on focussing growth in the Barwell and Earl Shilton area generally.

In 2015, the district council was minded to grant planning permission for the Barwell SUE, subject to completion of a Section 106 Agreement. Nearly 10 years on, and despite protracted work by the applicant, the transport elements of the S106 have yet to be resolved and agreed; even as and when they are, it is unclear how the much-changed circumstances since 2015 (such as very significant construction price inflation) might affect the site's financial viability. Despite such uncertainties, and the fact that the Barwell SUE impacts on the A5 Dodwells Longshoot Junction, it continues to feature as a key element of the draft Plan.

Regarding the Earl Shilton SUE, it was sluggish in coming forward and after 15 years has only recently gained planning permission. Despite this the draft Local Plan seeks to allocate an additional strategic site on land to the south of the A47 Earl Shilton bypass.

55. **Active and sustainable travel provision:** The LTA is currently developing a North of Leicester Local Cycling and Walking Infrastructure Plan, which it is anticipated will be adopted by the Authority towards the end of calendar year 2025. The LTA would welcome the opportunity to discuss with the district council how best this Plan might be reflected in the Local Plan; this is especially with regard to site allocations proposed in the north of the Borough and how it might be possible to provide a policy basis for such allocations to contribute reasonably to the LCWIP's delivery.
56. Additionally, and notwithstanding the LTA's comments on the need for strategic solutions to problems on the A5, to support further the Local Plan's delivery it appears that it will also be necessary to develop a cross-boundary transport strategy embracing at least Nuneaton. A primary focus of that strategy is likely to be on seeking to deliver coordinated enhancements to active and sustainable travel links between the 'Hinckley area' and Nuneaton, with a primary aim of seeking to reduce levels of carborne cross-traffic over the A5. The LTA would welcome the opportunity to discuss with the district council and Warwickshire County Council how best to move forward the development of such a cross-boundary strategy and how best it should be reflected in relevant Local Plans.
57. **Local Plan's relationship with the LTA's emerging new Local Transport Plan (LTP4):** The LTA is undertaking a public consultation, between 12<sup>th</sup> August 2024 and 23<sup>rd</sup> September 2024, on its LTP4 Core Document for the period 2026 – 2040.
58. The Core Document sets out the strategic vision which is:

*'Delivering a safe and connected transport network which is resilient and well-maintained to support the ambitions and health of our communities, deliver economic prosperity whilst safeguarding our environment.'*

59. The vision is supported by five core themes and six core policies:

a) The five core themes:

- i. Enabling health and wellbeing,
- ii. Protecting our environment,
- iii. Delivering economic growth,
- iv. Enhancing our transport network's resilience,
- v. Embracing innovation.

b) The six core policies:

- i. **Core Policy 1: Delivering the Vision** - Ensure that all our transport solutions align with the themes to deliver our vision for transport with regard to government policy for the benefit of our communities.
- ii. **Core Policy 2: Managing Demand** - Delivering a safe, accessible, connected and resilient transport network that is well managed and enables communities to access jobs education and services. The network will also enable efficient movement and delivery of goods to support the local, regional and international markets.
- iii. **Core Policy 3: Enabling Travel Choice** - Enabling travel choice in all of our communities that reflects their unique needs which ensures their safety whilst promoting health & wellbeing and protecting the environment.
- iv. **Core Policy 4: Delivering Solutions** - Work collaboratively to identify and develop transport related solutions which provide good value for money and enable travel choice, improve our transport network users' experiences, and benefit the environment and the health and wellbeing of our communities.
- v. **Core Policy 5: Embracing Innovation** - Embrace innovation and collaboration, which enables us to decarbonise transport and adapt to climate change to ensure a resilient transport network, whilst benefiting the environment and promoting the health & wellbeing of our communities.
- vi. **Core Policy 6: Evaluating Progress** - Utilise data, monitoring and evaluation of our transport solutions to enable evidence-based programmes, provide a flexible approach to policy development, technology, and innovation to address changes and challenges which impact our communities.

60. The LTA would request that consideration is given to the LTP4 Core Document in the Plan's further development, and the policies are used to assess the suitability of sites which can provide sustainable development and

provide betterment to communities by according with the five core themes and six core policies.

61. The uncertainties brought about by the Government's proposed planning reforms, together with the issues highlighted in the LTA's key comments, have fundamental implications for the Local Plan, which need to be addressed through the identification and delivery of suitable and viable transport solutions to enable the plan to be found sound and enable it to be successfully implemented. Given this, the LTA has not provided detailed comments on individual sections of the draft Plan. However, on review it notes that many of its previous consultation comments have not been addressed in this latest draft. For ease of reference those previous comments are attached at Appendix B to this report.
62. To conclude the LTA's comments, it has had cause to question the soundness of previous iterations of the new Hinckley and Bosworth Local Plan due to aspects in the control of the district council. To be clear, this is not the case with this draft of the Plan; the development of this version of the Plan is affected by many of the challenges set out in the National Planning Policy Framework Proposed Changes response paper (which is also being considered by the Cabinet), especially in respect of reliance on interventions on the SRN. These are circumstances beyond the district council's and LTA's control, and it is evident that the challenges are increasingly common to the development of Local Plan's elsewhere across Leicester and Leicestershire.

### **Spatial Portrait**

63. With regards paragraph 2.23 of the Local Plan, it is considered that there could also be reference made to the inequalities in life expectancy between the Borough's most and least deprived communities. This comment was also made in the Council's previous response to the Regulation 19 consultation.

### **Vision and Objectives**

64. Whilst the Strategic Growth Plan is referenced in *Section 1 – What is the Local Plan*, it is considered that this should also be set out in the Vision, capturing the intent of pivoting the delivery of growth to the spatial strategy set out in the Strategic Growth Plan to 2050.
65. Under the Plan's *Vision for Places – Environmental Objectives (6. Natural Environment)* - the text remains as was in the previously consulted-on Regulation 19 plan and is not considered to be in accordance with national policy. It is suggested the text is amended to read, "*To conserve and enhance the natural environment, ensure developments bring about net-gains in biodiversity, protect wildlife and irreplaceable habitats, and deliver a network of green infrastructure where natural open space is integrated within development and which connects and contributes to the Nature Recovery Network.*"



66. Under the Plan's *Vision for People – Social Communities (1. Healthy Communities and Places)*, it is suggested that this text is expanded to make reference to the importance of a variety of size, type and tenure of housing, as well as being of an appropriate quality.
67. It is unclear why the reference to tourism has been removed from the vision and the County Council seeks to have this reference reinstated.

### **Spatial Strategy**

68. The borough council's approach to adopt the housing figures contained in the latest SoCG (including the apportionment of Leicester City's unmet need), as a basis for the housing requirement in the Local Plan, is welcomed.
69. Given Leicester City Council's declaration of unmet need runs to 2036, the approach to 'roll-over' the apportioned annual figure for the entire plan period (to 2041) is considered sensible. However, it needs to be borne in mind that it is likely that the unmet housing need figure for the borough will increase in the 2036 to 2041 period which would mean provision would need to be made in the new Local Plan for a higher figure. Indeed, the new Standard Method which forms part of the NPPF Proposed Changes currently being consulted on indicates a higher figure for the borough.
70. As part of the review of the spatial strategy options, the Draft Plan refers to splitting the borough into four sub-areas as a starting point; 'Urban South', 'Central', 'West' and 'North East and Leicester Suburbs'. Whilst this approach is supported these sub-areas are not referenced anywhere else in the Plan, nor in any supporting documentation around proposed site allocations. Understanding how these sub-areas have been utilised to inform and arrive at the proposed site allocations is unclear.
71. The amount of provision over the Plan period is supported, although Policy SP02 contains a greater spread of allocations in settlements further down the hierarchy than anticipated, particularly non-strategic major development sites (101 to 499 dwellings in size). The County Council would wish to see a stronger focus on strategic site allocations in the Urban Area to provide for sustainable growth and the best opportunities to secure funding for essential strategic infrastructure.
72. The proposed allocation at Lindley Meadows for up to 3000 dwellings (1000 to be delivered in the Plan period) on land between MIRA and Fenny Drayton causes concern given the location of the proposed allocation, with limited opportunities for sustainable travel, and the close proximity to the A5 (challenges with capacity and mitigation measures required). The findings of the Strategic Growth Options Study (entitled "Strategic Growth Options and Constraints Mapping for Leicester and Leicestershire) includes reference to a potential strategic site to the west of Fenny Drayton (4c Fenny Drayton), the analysis of which is applicable to the proposed allocation at Lindley Meadows to the east of Fenny Drayton, which includes reference to the limited access to local amenities and challenges posed by the constraints on the A5 corridor.

73. There is an ongoing concern regarding an over reliance on the mixed use Barwell SUE (Policy SP02 2b) ii and Policy SP04) as part of the Local Plan strategy. Reference is also made to both the Barwell SUE and Earl Shilton SUE from the LTA in the substantive transport response.
74. As part of Policy SP02 Development Strategy, asterisks are used when referring to employment sites at Cliffe Hall Farm and Wapping and Harrow Farm, Watling Street Hinckley; the purpose of these asterisks are not clear and do not appear to point to any footnote.
75. The draft HBBC Level 1 Strategic Flood Risk Assessment (2024), includes several non-statutory policy recommendations which could be included in Policy SP06 on Flood Risk. The inclusion of the following to add weight to planning consultation responses would be welcomed:
- Development must consider the use of sustainable drainage systems (SuDS) and provide details of adoption, ongoing maintenance, and management.
  - Surface water runoff rates from all development sites must be limited to greenfield rates (including brownfield sites).
  - Culverting (except for essential infrastructure) is not permitted, and new development should day-light existing culverts, where feasible.
76. The 2019/20 Strategic Flood Risk Assessments are to be superseded by the current draft 2024 Strategic Flood Risk Assessment (Level 1), and the County Council as Lead Local Flood Authority looks forward to seeing the updated Level 2 Strategic Flood Risk Assessment, particularly given there are some new strategic sites being put forward as potential allocations.
77. Reference to according with neighbourhood plans is welcomed.
78. Paragraph 4.27 on 'Housing Growth' is not particularly well written and needs to be revisited to provide clarity.

### **Climate Change**

79. With regards Policy SP07 Renewable and Low Carbon Energy, it is noted that the renewable energy capacity study remains dated at 2014. It is therefore unlikely to reflect current and future energy needs of the borough given the transition to electricity for heating and transport. This comment was also made in response to the Regulation 19 consultation in early 2022.
80. Reference to the Local Area Energy Plan being prepared for Leicestershire is supported, it will form a spatial approach to decarbonising the energy system and should support significantly in contributing towards the delivery of net zero.

**Place Making and Design**

81. Hinckley and Bosworth BC is advised to note the likely changes in nutrient neutrality rules given the north western tip of the borough (north of Twycross) is located within the catchment area of the River Mease Special Area of Conservation.

**Housing to Meet Different Needs**

82. Hinckley and Bosworth BC is working with the Multi-Agency Traveller Unit on producing a 2024 Gypsy and Traveller Accommodation Assessment to replace the Gypsy and Traveller Accommodation Needs Study 2016 which is now out of date. With regards to Policy SP13 in the local plan clearer wording is sought for Transit pitches to reflect that any identified Transit need is to be met by the development of local authority Transit sites.

**Economic Prosperity**

83. Reference is made to the Strategic B8 requirements for Leicester and Leicestershire still emerging and this being dependent on the HNRFI DCO outcome, which is, as referenced earlier in this report, expected imminently. The County Council recognises this is the case and, to future proof work on the local plan as much as possible, advises strengthening the focus of new development on the Hinckley Urban Area.

**Town, District, Local and Neighbourhood Centres**

84. The specific policy steer for town, district, local and neighbourhood centres will come through in the Regulation 19 Local Plan. The County Council would look to see recognition of the behavioural change in society and a strengthening of the core retail area through a 'managed contraction', in parallel with a move for more emphasis on healthy options in all centres and a restriction on the number of hot food takeaways in favour of healthier retail uses, or community uses, leisure uses compatible with residential uses, and live/work units on the periphery of designated centres.

**Communities, Leisure and Tourism**

85. There is a request (referenced earlier in this report) for tourism to be reinstated in the vision for the Local Plan.

**Natural Environment**

86. There continues to be concern over the use of the Green Infrastructure Strategy (2020) as an acceptable evidence base. This issue was previously raised in the Regulation 19 response in March 2022.
87. Policy SP21 on Green Wedges is unclear (note points n. to r. duplicate h. to l) and needs to be amended.

88. No reference is made to the new Strategic Flood Risk Assessment being produced (2024) only refers to 2019 version (see chapter 5 under climate change).
89. Increased reference to the emerging Local Nature Recovery Strategy (LNRS) and mandatory Biodiversity Net Gain (BNG) is required.

### **Transport**

90. The response of the LTA is set out in the overarching response earlier in this report.

### **Infrastructure**

91. Note in paragraph 12.22 the term 'Local Education Authority' should be removed, and post-16 education should be more specifically referred to.

### **Equality Implications**

92. There are no equality implications arising from the recommendations in this report.

### **Human Rights Implications**

93. There are no human rights implications arising from the recommendations in this report.

### **Background Papers**

Report to the Cabinet on 23 November 2018: Leicester and Leicestershire Strategic Growth Plan – Consideration of Revised Plan for Approval  
<https://bit.ly/3SjDH8P>

Report to the Cabinet on 29 March 2019: Response to Consultation on Hinckley and Bosworth Borough Council's Local Plan Review: New Directions for Growth  
<https://bit.ly/3W1EVqP>

Report to the Cabinet on 20 November 2020: Leicester and Leicestershire Strategic Transport Priorities 2020 to 2050  
<https://bit.ly/3SIGT3y>

Report to the Cabinet on 22 June 2021: Urgent action taken by the Chief Executive in relation to the Leicester and Leicestershire Statement of Common Ground relating to housing and employment land needs (March 2021)  
<https://bit.ly/3SmMCpI>

Report to the Cabinet on 17 September 2021: Response to Hinckley and Bosworth Borough Council's draft Local Plan (Regulation 18) consultation

<https://bit.ly/4eZoHHG>

Report to the Cabinet on 26 October 2021: Urgent item - Development of Hinckley and Bosworth Borough Council's New Local Plan - Latest Position.

<https://bit.ly/4eWRIDO>

Report to the Cabinet on 14 December 2021: South Leicestershire Local Plan Making Statement of Common Ground (November 2021)

<https://bit.ly/3Ujew8K>

Report to the Cabinet on 29 March 2022: Response to the Hinckley and Bosworth Borough Council Pre Submission Local Plan (2020 - 2039) Regulation 19 Consultation.

<https://bit.ly/4bCyn88>

Report to the Cabinet on 23 September 2022: Leicester and Leicestershire Authorities – Statement of Common Ground relating to Housing and Employment Land Needs

<https://bit.ly/3ubU67a>

Report to the Cabinet on 25 November 2022: Managing the Risk Relating to the Delivery of Infrastructure to Support Growth

<https://bit.ly/3SBSaxY>

## **Appendices**

Appendix A: Leicestershire County Council Proposed Response to consultation on Hinckley and Bosworth Regulation 18 Draft Local Plan Consultation (July 2024)

Appendix B: LTA comments on Hinckley and Bosworth BC Draft Local Plan 2020 to 2039 Regulation 18 (July 2021)

This page is intentionally left blank

## **APPENDIX A**

### **Leicestershire County Council's Proposed Response to consultation on Hinckley and Bosworth Borough Council New Local Plan (2020 to 2041) Regulation 18 Consultation Draft Plan July 2024**

#### ***Section 1: What is the Local Plan?***

##### ***Q1 How has it been prepared?***

Concern that the evidence base is still not complete, and the spatial development strategy moves away from a focus on the major urban area. See further detailed responses to questions.

##### ***Q2 What has occurred since the Regulation 19 pre-submission consultation in 2022?***

Nationally there has been a continued worsening of finance for local government which impacts on the ability to provide strategic infrastructure. The requirements of the Levelling Up and Regeneration Act 2023 (provisions and secondary legislation still coming forward), and the recent announcement of the new planning reforms and current consultation on the National Planning Policy Framework Proposed Changes (which includes a new Standard Method for calculating housing need), provide a context of continuing planning reforms.

In Leicestershire the County Council considered the increasing pressures on the County Council's Capital Programme relating to infrastructure at Cabinet in May 2022, financial implications for the Council of delivering sustainable and inclusive growth (plus agreed approach and principles to manage these risks) at Cabinet in November 2022, and has been working on an approach with Charnwood BC regarding the Charnwood Interim Transport Contributions Strategy.

The County Council supports developing the evidence base and having a complete policy approach in the local plan. As retrofitting a local plan with evidence developed after submission is very problematic. In parallel, input to the Development Management process is critical, in recognition of the time it takes to progress a Local Plan through to adoption.

##### ***Q3 Neighbourhood Planning***

Support bringing forward further Neighbourhood Plans and the review of existing made Neighbourhood Plans in the area.

##### ***Q4 Strategic Growth Plan***

Welcome reference to the Strategic Growth Plan and the long-term vision and steer it provides for local plans in Leicester and Leicestershire.

##### ***Q5 Duty to co-operate and statements of common ground***

Demonstrated through the Leicester and Leicestershire Statement of Common Ground (SoCG) relating to Housing and Employment Need (July 2022) and the South Leicestershire authorities' joint evidence SoCG (December 2021).

### **Q6 General or other comments**

Unfortunately, it is apparent that many of the comments made previously on the last local plan consultation in March 2022, or the penultimate consultation in September 2021 appear to have not shaped or informed this draft plan. To strengthen the plan and make the best use of resources reference to these comments is advised.

A full health impact assessment is being undertaken by Leicestershire County Council's Public Health team who are working closely with Hinckley and Bosworth BC to provide public health data and ensure health considerations within Local Plans improve health and wellbeing outcomes of local residents. A HIA stakeholder workshop is arranged for September and full HIA report will be submitted to planners by end of October.

## **Section 2: Spatial Portrait**

### **Q7 Spatial Portrait**

Paragraph 2.9 notes highest percentage of usual residents aged 65 and over were more commonly located in more rural central parishes. An aging population can bring challenges of accessibility, rural isolation and inadequate provision of services.

Paragraph 2.19 notes Hinckley and Bosworth's unemployment rate has consistently remained below Great Britain and East Midlands averages for over a decade, with the borough's figure dropping as low as 2.1% in December 2022. before rising slightly up to 3.4% in December 2023. In December 2023, the unemployment figure remains below Great Britain and East Midland averages of 3.7%.

Would be helpful to break this inactivity down by age as with an ageing workforce the economically inactive could include a % of older people who are unlikely to re-enter the workplace versus students who potentially could.

Paragraph 2.28 – Service Provision: Add Triumph Visitor Centre to list of main visitor attractions. Market Bosworth, one of Leicestershire's prettiest market towns, is also a key Leicestershire visitor destination. Refer to page 35 of Leicestershire Tourism Growth Plan "Explore Bosworth"

<https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/11/8/leicester-leicestershire-tourism-growth-plan.pdf>

## **Section 3: Vision and Objectives**

### **Q8 Vision and Objectives**

The statement within the vision which states "Development will be focused in the urban areas where it will be closest to key services, opportunities, key transport links and facilities" is welcomed as it will lead to development in the most sustainable



locations. The statement “Sustainable development will be supported in rural communities with our key rural centres and villages shaped by the Local Plan.” is supported as it will support existing community infrastructure and maintain sustainable communities in key rural settlements.

Further, the plan objectives are broadly welcomed in particular economic objectives 10,11 and 12.

P24 People - Social Objectives - Healthy Communities and Places

No mention of trying to ensure that there is a supply of employment opportunities available locally so that people do not have to travel – this becomes more sustainable and is better for people on low paid jobs.

P26 13. Towns and Village Centres –

It is important that any development maintains the historic and attractive character of Market Bosworth upon which a number of tourism and hospitality Small and Medium Enterprises depend.

There has been concern in recent years regarding the proposed MIRA test track extension and its impact on the historic Bosworth Battlefield site (mentioned on page 76 of the Plan).

Suggest changes and additions below to strengthen links to waste prevention as well as other measures to reduce carbon footprint.

### **Vision**

*...Sustainable development will be supported in ~~in rural~~ **our** communities with our key rural centres and villages shaped by the Local Plan and neighbourhood plans influenced by our communities. Growth will respect the borough’s important townscapes and natural landscapes, and the borough is a place where our historic and cultural assets will be respected for their intrinsic significance and for the positivity benefits they can bring. The borough will have a cleaner and greener environment and we will promote sustainable development and initiatives to reduce the carbon footprint of the borough **through energy efficiency measures, waste prevention and nature-based solutions.***

Suggest inclusion of the waste hierarchy within the environmental objectives:

For Environmental Objectives 7. ‘*Climate Change - To mitigate climate change and reduce the effects of new development on air quality and carbon emissions by promoting a sustainable pattern of development, the use of sustainable materials, nature-based solutions, low carbon technologies, sustainable transport options, renewable energy and energy efficiency measures **and the waste hierarchy (preventing, reducing, reuse and recycling waste).***’

### **Section 4: Spatial Strategy**

#### **Q9 SP01 Sustainable Development**

Policy SP01 reflects the provisions of NPPF (National Planning Policy Framework) paragraph 11 and is therefore supported.

Paragraph 4.10 on Affordable Housing. In the Spatial Portrait in Section 2 the following statement was made: highest percentage of usual residents aged 65 and over were more commonly located in more rural central parishes.

The availability of affordable housing in rural areas is critical to attracting and retaining residents, particularly the younger working populations. According to the **Rural Services Network** in their report “Winning the Rural Vote – A Roadmap to Rural Success” (2024) houses in rural areas are less affordable to purchase for those in the bottom 25% of earners compared to urban. They also state that lower than average wages are earned in the rural economy, making accessing housing unaffordable. They also claim that rural areas suffer from a lack of affordable rental property. This could be given consideration when evaluating a need for affordable housing.

Page 32 - 180 homes on land south of Station Road (phase 2), Market Bosworth; Refer to point made in Section 3 regarding Market Bosworth - It is important that any development maintains the historic and attractive character of the area upon which a number of tourism and hospitality Small and Medium Enterprises depend.

#### ***Q10 SP02 Development Strategy***

Provision is made for the delivery of 13,862 homes to be delivered in the period 2020-2041; a figure that accords with the housing need identified in the Leicester and Leicestershire Statement of Common Ground relating to Housing and Employment Need. This is welcomed.

It is considered that this figure be regarded as a minimum to which a flexibility allowance of up to 10% be added in order to provide the plan with additional resilience in the event of development not coming forward in line with current projections. Further, by adding an allowance over and above the basic requirement will facilitate the delivery of increased levels of affordable housing necessary to reduce the shortfall in meeting currently assessed need.

Given Leicester City Council’s declaration of unmet need runs to 2036, the approach to ‘roll-over’ the apportioned annual figure for the entire plan period (to 2041) is considered sensible. However, it needs to be borne in mind that it is likely that the unmet housing need figure for the borough will increase in the 2036 to 2041 period which would mean provision would need to be made in the new Local Plan for a higher figure. Indeed, the new Standard Method which forms part of the NPPF Proposed Changes currently being consulted on indicates a higher figure for the borough.

The amount of provision over the Plan period is supported, although Policy SP02 contains a greater spread of allocations in settlements further down the hierarchy than anticipated, particularly non-strategic major development sites (101 to 499 dwellings in size). The County Council would wish to see a stronger focus on strategic site allocations in the Urban Area to provide for sustainable growth and the best opportunities to secure funding for essential strategic infrastructure.

The County Council has concerns regarding the new settlement proposal at Lindley Meadows. The proposed allocation at Lindley Meadows for up to 3000 dwellings (1000 to be delivered in the Plan period) on land between MIRA and Fenny Drayton causes concern given the location of the proposed allocation, with limited opportunities for sustainable travel, and the close proximity to the A5 (challenges with capacity and mitigation measures required). The findings of the Strategic Growth Options Study (entitled “Strategic Growth Options and Constraints Mapping for Leicester and Leicestershire”) includes reference to a potential strategic site to the west of Fenny Drayton (4c Fenny Drayton), the analysis of which is applicable to the proposed allocation at Lindley Meadows to the east of Fenny Drayton, which includes reference to the limited access to local amenities and challenges posed by the constraints on the A5 corridor.

As part of the review of the spatial strategy options, the Draft Plan refers to splitting the borough into four sub-areas as a starting point; ‘Urban South’, ‘Central’, ‘West’ and ‘North East and Leicester Suburbs’. Whilst this approach is supported these sub-areas are not referenced anywhere else in the Plan, nor in any supporting documentation around proposed site allocations. Understanding how these sub-areas have been utilised to inform and arrive at the proposed site allocations is unclear.

Given the evidence provided in the SGP (Strategic Growth Plan) Growth Options Report which concluded that a 128 hectare site on land North of Normandy Way Hinckley, capable of delivering 3200 houses, is a suitable site for strategic development there appears little justification in making only a partial allocation of 1200 houses as the full allocation would ensure an ongoing supply of houses throughout the plan period in a sustainable location. Further, the distribution strategy will also need to take account of the outcome of the HNRFI (Hinckley National Rail Freight Interchange) DCO (Development Consent Order) Application which, if successful, may require an even greater focus is placed on housing delivery in sustainable locations around the Hinckley urban area including North of Normandy Way.

Welcome the provision of 194.68ha of employment land during the plan period. Strategic employment land should be allocated within existing urban areas, adjacent to existing urban areas or within sustainable locations aligned to the strategic transport network. Good to note that the Local Plan will consider the outcome of the Hinckley National Rail Freight Interchange DCO application when considering strategic distribution needs.

There is an ongoing concern regarding an over reliance on the mixed use Barwell SUE (Policy SP02 2b) ii and Policy SP04) as part of the Local Plan strategy. Reference is also made to both the Barwell SUE and Earl Shilton SUE by the LTA (Local Transport Authority) in the substantive transport response.

As part of Policy SP02 Development Strategy, asterisks are used when referring to employment sites at Cliffe Hall Farm and Wapping and Harrow Farm, Watling Street Hinckley; the purpose of these asterisks are not clear and do not appear to point to any footnote.

The County Council would welcome consideration in regard to new developments and their impact on local Household Waste and Recycling Centres (HWRCs), due to the increase in waste arisings.

**Q11 SP03 Strategic Site: Earl Shilton Sustainable Urban Extension (SUE)**

The Earl Shilton SUE has been slow to come forward and after 15 years has only recently gained planning permission. Despite this the draft Local Plan seeks to allocate an additional strategic site on land to the south of the A47 Earl Shilton bypass.

The County Council would welcome further engagement to help forward plan regarding managing future capacity at local Household Waste and Recycling Centres (HWRCs).

**Q12 SP04 Strategic Site: Barwell Sustainable Urban Extension (SUE)**

In 2015, the district council was minded to grant planning permission for the Barwell SUE, subject to completion of a Section 106 Agreement. Nearly 10 years on, and despite protracted work by the applicant, the transport elements of the S106 have yet to be resolved and agreed; even as and when they are, it is unclear how the much-changed circumstances since 2015 (such as very significant construction price inflation) might affect the site's financial viability. Despite such uncertainties, and the fact that the Barwell SUE impacts on the A5 Dodwells Longshoot Junction, it continues to feature as a key element of the draft Plan.

There is an ongoing concern regarding an over reliance on the mixed use Barwell SUE (Policy SP02 2b) ii and Policy SP04) as part of the Local Plan strategy.

The County Council would welcome further engagement to help forward plan regarding managing future capacity at local Household Waste and Recycling Centres (HWRCs).

**Q13 General or other comments**

The amount of provision over the Plan period is supported, although Policy SP02 contains a greater spread of allocations in settlements further down the hierarchy than anticipated, particularly non-strategic major development sites (101 to 499 dwellings in size). The County Council would wish to see a stronger focus on strategic site allocations in the Urban Area to provide for sustainable growth and the best opportunities to secure funding for essential strategic infrastructure.

The proposed allocation at Lindley Meadows for up to 3000 dwellings (1000 to be delivered in the Plan period) on land between MIRA and Fenny Drayton causes concern given the location of the proposed allocation, with limited opportunities for sustainable travel, and the close proximity to the A5 (challenges with capacity and mitigation measures required). The findings of the Strategic Growth Options Study (entitled "Strategic Growth Options and Constraints Mapping for Leicester and Leicestershire) includes reference to a potential strategic site to the west of Fenny Drayton (4c Fenny Drayton), the analysis of which is applicable to the proposed

allocation at Lindley Meadows to the east of Fenny Drayton, which includes reference to the limited access to local amenities and challenges posed by the constraints on the A5 corridor.

The Earl Shilton and Barwell SUEs are, as yet not delivering the predicted level of housing numbers as outlined in the current and emerging local plans. Therefore, it may be necessary for the plan to provide reassurance as to the future housing delivery or alternatively bring forward additional allocations to meet any shortfall and maintain a 5-year housing land supply.

## **Section 5: Climate Change**

### **Q14 SP05 Mitigating and Adapting to Climate Change**

We welcome the inclusion of circular economy principles, waste reduction and specific mention of waste design in major developments.

Page 46 Support active design, active travel and sustainable public transport modes to reduce demand for car use.

Twycross Zoo is one of the largest visitor attractions in the East Midlands attracting over half a million visitors annually. There is no bus route that includes the Zoo and access along the A444 is difficult for cyclists and pedestrians. Almost all visitor journeys are made by private car or coach which impacts on carbon emissions. As well as visitors from outside the area, the zoo is a popular leisure attraction for local residents. Alternative modes should be considered.

Suggest including additional text in bold under part 'p' to include waste prevention:

*Part p 'Incorporating recycling and waste **prevention** / reduction both during construction and occupation'*

Suggest adding the text below into the policy SP05 to allow consideration to the waste hierarchy during development:

***'Development must follow the waste hierarchy to prevent, minimise, reuse, and recycle waste during the construction phase and to encourage greater levels of reuse, recovery and recycling over the lifetime of the development.'***

### **Q15 SP06 Flood Risk**

Policy SP06 reiterates statements that are present within NPPF and PPG which can be helpful to support the Lead Local Flood Authority's position on a consultation response. However, from a regulatory perspective, any policy statements that add weight to non-statutory guidance or local policies are of greater benefit.

It would be more impactful if the policy could be written more concisely with bulleting or numbering of individual statements. Consideration should be made as to whether HBBC want to include statements already strongly supported by NPPF and PPG.

The draft HBBC Level 1 Strategic Flood Risk Assessment (2024), includes several non-statutory policy recommendations which could be included in Policy SP06 on Flood Risk. The inclusion of the following to add weight to planning consultation responses would be welcomed:

- Development must consider the use of sustainable drainage systems (SuDS) and provide details of adoption, ongoing maintenance, and management.
- Surface water runoff rates from all development sites must be limited to greenfield rates (including brownfield sites).
- Culverting (except for essential infrastructure) is not permitted, and new development should day-light existing culverts, where feasible.

The 2019/20 Strategic Flood Risk Assessments are to be superseded by the current draft 2024 Strategic Flood Risk Assessment (Level 1), and the County Council as Lead Local Flood Authority looks forward to seeing the updated Level 2 Strategic Flood Risk Assessment, particularly given there are some new strategic sites being put forward as potential allocations.

#### ***Q16 SP07 Renewable and Low Carbon Energy***

The policy is supported in that it enables commercial renewable energy schemes to be brought forward and assessed solely on the basis of planning criteria.

A study from 2014 is highly unlikely to be relevant due to the significant advancement in technology, knowledge, capabilities etc within the renewable energy world over the last 10 years. Renewable capacity technology in 2024 is significantly more advanced, and this could mean more sites have potential for renewable energy than in 2014.

There is an obvious opportunity here for waste developments to contribute to renewable energy production which can be included in the supporting text to the policy. This could explain that where appropriate and feasible there may be opportunity for decentralised energy development where it could be supplied by a major producer of heat/energy/steam such as a waste site.

#### ***Q17 General or other comments***

No further comments at this time.

### ***Section 6: Place Making and Design***

#### ***Q18 SP08 High Quality Design***

Welcome inclusion of recycling and waste management provision.

Page 58 on High Quality Design, ensure a sufficient level of vehicle parking, recycling and waste management (in line with adopted standards) that is well-integrated and not the main visual element.

As part of the Hinckley and Bosworth BC's ambitions to reduce carbon emissions, it is important that EV (Electric Vehicle) charging point infrastructure is accommodated within development sites.

Page 60 on Public Spaces, make a space interesting and exciting, public art, seating, etc

Earlier in the Plan, reference was made to the value of local heritage (such as hosiery, motor manufacturing, mining) in place making and place shaping. Incorporating an element of local history into these public realm improvements could increase a sense of community belonging and local identity.

Suggest including new text in bold within part 'I' to give a breakdown of waste management considerations:

*'I) Ensures a sufficient level of vehicle parking, recycling and waste management (including appropriate collection vehicle access, facilities for kerbside collection, waste separation, and minimisation where appropriate) that is well-integrated and not the main visual element'*

Suggest adding in the text below to policy SP08 to allow consideration to the waste hierarchy during development as well as other potential considerations to address carbon emissions:

***'Development must consider how carbon emissions have been addressed and minimised including through materials sourcing, development design and layout, the energy hierarchy, water cycle, waste hierarchy and waste management solutions (during and post-construction).'***

### **Q19 SP10 Preventing Pollution**

The proposed policy should encompass the NPPF 'agent of change' principle as this will help to ensure that the continued use or expansion of extant minerals and waste sites are not prejudiced by the introduction of sensitive uses in the vicinity.

### **Q20 SP11 Health and Well-being**

A full health impact assessment is being undertaken by Leicestershire County Council's Public Health team who are working closely with Hinckley and Bosworth BC to provide public health data and ensure health considerations within Local Plans improve health and wellbeing outcomes of local residents. A HIA stakeholder workshop is arranged for September and full HIA report will be submitted to planners by end of October 2024.

It is important to remember that the protection of human health and the environment are important elements of the Waste Framework Directive which are delivered by local planning authorities. NPPG is clear that Article 4: Waste Hierarchy and Article 13: Protection of human health and the environment are the responsibility of all planning authorities, not just waste planning authorities.

### **Q21 Overall or other comments**

Hinckley and Bosworth BC is advised to note the likely changes in nutrient neutrality rules given the north western tip of the borough (north of Twycross) is located within the catchment area of the River Mease Special Area of Conservation (SAC). Natural England initially advised on this SAC in 2022.

Paragraph 6.47 on Health Impact Assessments being required for all major developments is supported, though it is noted there are a significantly number of minor amendments required to correct the text.

## ***Section 7: Housing to Meet Different Needs***

### ***Q22 SP13 Gypsies, Travellers and Travelling Showpeople***

Hinckley and Bosworth BC is working with the Multi-Agency Traveller Unit on producing a 2024 Gypsy and Traveller Accommodation Assessment to replace the Gypsy and Traveller Accommodation Needs Study 2016 which is now out of date. With regards to Policy SP13 in the local plan clearer wording is sought for Transit pitches to reflect that any identified Transit need is to be met by the development of local authority Transit sites.

The 2023 Health Inequalities Joint Strategic Needs Assessment found certain population groups across Leicestershire to be at a higher risk of experiencing health inequalities. The Gypsy and Traveller population were indicated as a group of concern for health inequalities.

Minerals and waste safeguarding is also important in this case to ensure that sensitive uses (GTT sites) are not introduced into the vicinity of the existing minerals or waste sites. This could cause amenity issues for residents of the new sites or complaints arising should applications be made to intensify activity at the existing minerals and waste sites.

The development of a site in a mineral safeguarding area could also sterilise the mineral resource beneath or adjacent to the site and would therefore be contrary to Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) without a Mineral Assessment. This should therefore form a consideration in the assessment of suitable sites.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. Allocations should therefore also consider waste sites.

### ***Q23 Overall or other comments***

Whilst appreciating the need to meet the specific housing needs of Gypsies, Travellers and Travelling Showpeople the policy needs to be broadened to include



all those groups detailed in NPPF paragraph 63 not covered elsewhere in the plan, and reference the fact that others are included within relevant policies.

### **Section 8: Economic Prosperity**

#### **Q24 SP16 Strategic Site: MIRA Enterprise Zone**

Welcome the specific policy to support high quality employment aligned to the MIRA enterprise zone. Policy needs to reflect the evolving innovation around mobility and automation technology, so not to limit emerging automotive-aligned sectors.

#### **Q25 Overall or other comments**

Reference is made to the Strategic B8 requirements for Leicester and Leicestershire still emerging and this being dependent on the HNRFI DCO outcome, which is expected imminently. The County Council recognises this is the case and, to future proof work on the local plan as much as possible, advises strengthening the focus of new development on the Hinckley Urban Area.

On page 73 the Plan states “Whilst there is adequate supply overall (66ha) for the plan period, econometric forecasting indicates that for some sectors, there is likely to be an additional requirement for general employment land in the region of between 33ha to 55ha”. It would be useful to expand on what sectors are forecast to grow.

Further on page 73 there seems to be a focus in providing land for large warehousing, (together with land supply at MIRA which will create more skilled jobs) potentially limiting the type of employment uses moving forward. Industry insights (see NOTES below) indicate modern, large warehouses are becoming increasingly more automated, requiring a different skill set to traditional warehouse operators. Additionally, units are also incorporating more back-office functions. There is little information on the current skills levels of HBBC residents and whether there is a need to upskill residents. To remain competitive, HBBC should incorporate policies to train and attract high skilled employees to support the needs of future occupiers.

Appreciate that, given HBBC’s location on the strategic road network with the A5 and M69 near Hinckley and M1 at Markfield, it appeals towards ‘big shed’ developers but have the skills levels of the existing workforce been examined? How many people in HBBC work at Enterprise Zone at MIRA? Is ‘grow on’ space required for existing businesses?

Following the pandemic, more employers are adopting the hybrid-working model, which is seeing an evolution of traditional office accommodation over large floor plates, to smaller, high-quality, regional, mixed-use offices, aligned to areas that offer a ‘good quality of life’. HBBC should consider whether the district has sufficient, high quality, flexible office accommodation and what the need would be for supplying more.

NOTES: Industry insights <https://uk-manufacturing-online.co.uk/key-warehouse-automation-trends-to-watch-out-for-in-2024/>

<https://interactanalysis.com/insight/why-the-uk-is-set-to-become-europes-largest-warehouse-automation-opportunity/>

<https://statzon.com/insights/the-warehouse-automation-market#:~:text=With%20the%20significant%20increase%20in,by%20Next%20Move%20Strategy%20Consulting.>

<https://www.nextmsc.com/report/ul-industrial-process-automation-market>

## ***Section 9: Town, District, Local and Neighbourhood Centres***

### ***Q26 Town, District, Local and Neighbourhood Centres***

The County Council would look to see recognition of the behavioural change in society and a strengthening of the core retail area through a 'managed contraction', in parallel with a move for more emphasis on healthy options in all centres and a restriction on the number of hot food takeaways in favour of healthier retail uses, or community uses, leisure uses compatible with residential uses, and live/work units on the periphery of designated centres.

## ***Section 10: Communities, Leisure and Tourism***

### ***Q27 SP19 Twycross Zoo***

Page 81, the attraction welcomes 500,000 visitors not 5 million.

### ***Q28 Overall or other comments***

No further comments at this time.

## ***Section 11: Natural Environment***

### ***Q29 SP20 Green Infrastructure***

There continues to be concern over the use of the Green Infrastructure Strategy (2020) as an acceptable evidence base. This issue was previously raised in the Regulation 19 response in March 2022.

Policy SP21 on Green Wedges is unclear (note points n. to r. duplicate h. to l) and needs to be amended.

No reference is made to the new Strategic Flood Risk Assessment being produced (2024) only refers to 2019 version (see chapter 5 under climate change).

Increased reference to the emerging Local Nature Recovery Strategy (LNRS) and mandatory Biodiversity Net Gain (BNG) are required to help futureproof the Plan.

There is an old reference to NPPF 2021 which needs updating.

Green infrastructure has a significant impact on people's health and wellbeing including but not limited to air quality, physical and mental health and social

wellbeing. Accessibility should be considered for different groups of people and the Local Plan should consider how Green Infrastructure planning can influence health inequalities. Recommendations on green space will be provided within the full Health Impact Assessment (HIA) report which will be submitted to planners by end of October 2024.

Mineral (and sometimes waste) site restoration has biodiversity and green and blue infrastructure benefits, and this could be recognised in the supporting text. This could be through habitat creation for example, or through flood storage on former minerals sites. There may be the opportunity to join development into more strategic Green and Blue Infrastructure delivered by mineral or waste site restoration which could be mentioned here. This also links to the climate emergency.

The policy should refer to the Local Nature Recovery Strategy. This is particularly relevant at the point at which major developments prepare a Green and Blue Infrastructure Plan.

The word biodiversity should feature in the list of natural capital assets listed in point 'e' and refer to species...'such as bee pollinator friendly'

Section 'g' misses the words 'blue' in relation to maintenance of infrastructure.

Under paragraph 11.1 there should be reference to the Biodiversity Duty placed on the Council under the Environment Act 2021.

### ***Q30 SP21 Green Wedges***

Under policy box point 'i' and 'o' also mention blue networks within the Green Wedge.

Under point 'k' and 'q' add the words 'enhance the visual appearance of the green wedge.'

### ***Q31 SP24 Protecting Biodiversity***

See response to Q 29.

### ***Q32 SP25 Enhancing Biodiversity and Habitat Connectivity***

The Local Nature Recovery Strategy also needs to be embedded in Policy SP25.

Mineral (and sometimes waste) site restoration has biodiversity and green and blue infrastructure benefits, and this could be recognised in the supporting text. This could be through habitat creation for example, or through flood storage on former minerals sites. There may be the opportunity to join development into more strategic Green and Blue Infrastructure delivered by mineral or waste site restoration which could be mentioned here. This also links to the climate emergency.

### ***Q33 SP26 Development in the Countryside and Settlement Separation***

Welcome the inclusion of minerals and waste development in the permitted uses in the countryside.

### ***Q34 SP27 Landscape Character***

Under point 'e' wording should say 'Where significant landscape impacts are likely to occur a Landscape and Visual Impact Assessment (LVIA) should be submitted. Prepared in accordance with the Landscape Institute's "Guidelines for Landscape and Visual Impact Assessment, third edition (GLVIA3) 2013" which is the industry standard work on LVIA giving detailed advice on the process of assessing the landscape and visual effects of developments and their significance.

**Q35 SP28 Blue Infrastructure**

Welcome the mention of relatively substantial still water bodies at former mineral sites in the north of the borough such as Thornton Reservoir and Groby Pool. It should be noted that former mineral (and in certain cases waste) sites can provide green and blue infrastructure and also act as climate change mitigation by providing flood storage.

With respect to water bodies Sustainable Urban Drainage should also be mentioned in the policy around blue infrastructure and has relevance to green & blue infrastructure in relation to the development of highways (Section 12).

**Section 12: Transport**

**Q36 SP29 Transport, Movement and Access**

The response of the Local Transport Authority is set out in the overarching response earlier in the main report.

It is noted there is no reference to the cycling and walking strategy which is currently being developed to the north of Leicester. This needs to be referenced together with the substantial challenges detailed earlier in the main report, the work on LTP4 and how this Local Plan seeks to meet the core objectives and core policies of LTP4.

**Q37 SP30 A5 Improvement Corridor**

See the overarching response in the main report and response to Q36 above.

**Section 13: Infrastructure**

**Q38 SP31 Infrastructure and Delivery**

The policy recognises that the delivery of infrastructure is an integral part of the development process vital to ensuring that the needs of the community are met. Focussing development on strategic sites of appropriate scale is seen as the best way of securing the infrastructure required to support new communities and provide wider benefits for surrounding areas.

Note in paragraph 12.22 the term 'Local Education Authority' should be removed, and post-16 education should be more specifically referred to.

We support the inclusion of waste management facilities in the list of Critical Infrastructure in the supporting text of this policy. We also support the inclusion of water supply and sewerage in the list of Critical Infrastructure. It could also be mentioned that whilst connected planning functions are delivered by the County Council, minerals make an essential contribution to the country's prosperity and quality of life.

The County Council support 'Waste Management Facilities' as critical infrastructure.

### **Q39 SP32 Water Supply and Wastewater Management**

We support the aims of the policy in relation to both water use and efficiency and the provision of adequate water supply and wastewater treatment infrastructure and capacity. We welcome the intention to ensure that adequate wastewater treatment infrastructure and capacity and water supply is in place to serve the development at the time of occupation.

### **Q40 SP33 Telecommunications Infrastructure**

Section 12.35 (page 122) makes reference to providing superfast broadband. Commercial and government broadband delivery projects are no longer centred around superfast broadband delivery.

Currently reads as "... *The key consideration for telecommunications in the Local Plan is to ensure that new development is fully equipped and future-proofed to provide superfast broadband provision.*"

Suggested alternative wording to be inclusive of future broadband developments: "*The key consideration for telecommunications in the Local Plan is to ensure that new development is fully equipped and future-proofed to provide access to fast and reliable broadband.*"

## **Appendix 1: Glossary**

### **Q41 Glossary**

Ensure the Local Nature Recovery Strategy (LNRS) is included.

## **Appendix 2: Key Diagram**

### **Q42 Key Diagram**

As currently presented the key diagram does not show any strategic allocations other than the Barwell and Earl Shilton Sustainable Urban Extensions. The next iteration of the key diagram needs to spatially illustrate where development is being directed to.

## **Appendix 3: Reg 18 Proposed Site Allocations V6**

### **Q43 AS237: Earl Shilton Sustainable Urban Extension (SUE)**

Note concern raised in the main report regarding the Earl Shilton SUE.

Whilst it is appreciated that there are now extant outline permissions on the site (ref 21/01511/OUT and 23/00330/OUT), it is still pertinent to consider the need for waste safeguarding and for this to be considered through the development process.

Under Policy W9 of the Leicestershire Minerals and Waste Local Plan (LMWLP) it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. The allocation seems to surround a Sewage Treatment Works.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

***Q44 AS58: Barwell Sustainable Urban Extension (SUE)***

Note concern raised in the main report regarding the Barwell SUE. There is an ongoing concern regarding an over reliance on the mixed use Barwell SUE (Policy SP02 2b) ii and Policy SP04) as part of the Local Plan strategy.

As you will be aware, the site lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

We are aware that this site is the subject of an outline planning application which remains live at time of writing (ref 12/00295/OUT). It remains pertinent to consider the need for mineral safeguarding and for this to be considered through the development process.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. The allocation seems to surround a RHWS recycling centre.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

***Q45 LPR200: Land South of the A47, Earl Shilton***

Note concern raised in the main report regarding the Earl Shilton SUE and the implications this has for potentially identifying an extension to the Earl Shilton SUE on land to the south of the A47, Earl Shilton.

The site lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral,

including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. The allocation seems to surround Earl Shilton Sewage Treatment Works. It is noted that the site is across the A47 to the south of the STW. The effects of topography however result in the allocation surrounding the site on two sides.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

***Q46 AS1029, AS1031 A, AS1031 B and LPR199: North of Normandy Way, Hinckley North, Hinckley***

The principle of delivering a strategic development area north of Normandy Way is supported. However, it is considered that land at Middlefield Farm, Hinckley, situated in two blocks to the East and West of Stoke Road (SHELAA (Strategic Housing and Economic Land Availability Assessment) Ref LPR 47 and LPR 48) be allocated as part of a wider scheme as envisaged in the SGP Strategic Growth Options Report which concluded that a 128 hectare site on land North of Normandy Way Hinckley, capable of delivering 3200 houses, was a suitable site for strategic development. Accordingly, there appears little justification in making only a partial allocation of 1200 houses as the full allocation would ensure an ongoing supply of houses throughout the plan period in a sustainable location and support the delivery of highways and community infrastructure, in addition to providing additional resilience in the delivery of the housing needs of the Borough.

Further, if the HNRFI DCO Application is successful a strategic development North of Normandy Way would be ideally located to meet some of the increased housing needs generated by that development.

The majority of the site allocation is not within a Minerals Safeguarding Area. That part of the site which is a Residential Site benefitting from outline planning permission (ref 22/00318/OUT) lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. We are aware of live applications on the site (refs 23/00432/OUT and 24/00264/OUT). Under Policy W9 of the LMWLP it is important

to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

### **County Council in its role as landowner**

A separate more detailed consultation response will be submitted in support of the proposed allocation of Middlefield Farm. The site which is in the sole ownership of the County Council is considered to be suitable, available and deliverable and capable of delivering much needed housing within the plan period.

This has been confirmed by the initial due diligence work that has been undertaken to date. Further, work including the preparation of a draft masterplan and vision statement will be made available to the Council to further inform the emerging plan. Whilst the site is being promoted by the County Council rather than a housebuilder it is the County Council's normal practice to bring sites to the market immediately on the grant of an outline planning permission in much the same manner as a private sector land promoter. This model has a successful track record having previously brought forward an initial phase of development at Barton Road, as well as elsewhere across the county.

### ***Q47 LPR31: Land West of Hinckley West, Hinckley***

The principle of allocating land to the west of Hinckley West is supported, as it would bring forward further residential development in the Hinckley Urban Area.

The Ashby de la Zouch Canal on the western boundary of the potential allocation is noted and support is given to the proposed 20m natural buffer.

The site allocation is not within a Minerals Safeguarding Area.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

### ***Q48 LPR235 A: Lindley Meadows***

Note concern raised in the main report regarding the Lindley Meadows proposed new settlement.

The proposed allocation at Lindley Meadows for up to 3000 dwellings (1000 to be delivered in the Plan period) on land between MIRA and Fenny Drayton causes



concern given the location of the proposed allocation, with limited opportunities for sustainable travel, and the close proximity to the A5 (challenges with capacity and mitigation measures required). The findings of the Strategic Growth Options Study (entitled “Strategic Growth Options and Constraints Mapping for Leicester and Leicestershire) includes reference to a potential strategic site to the west of Fenny Drayton (4c Fenny Drayton), the analysis of which is applicable to the proposed allocation at Lindley Meadows to the east of Fenny Drayton, which includes reference to the limited access to local amenities and challenges posed by the constraints on the A5 corridor.

The advice of the Lead Local Flood Authority will need to be sought, given the Level 2 Strategic Flood Risk Assessment is still to be undertaken and there have been occurrences of flooding at MIRA, adjacent to this potential allocation.

Part of the site lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

***Q49 LPR138 Land at Brick Kiln Street (the former Cadent site), Hinckley***

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

In principle support is given to this brownfield site within the Hinckley Urban Area.

The site allocation is not within a Minerals Safeguarding Area. There are no issues from a waste safeguarding perspective.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

***Q50 LPR107: Land South of Markfield Road, Ratby***

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made

in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

Part of the site lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. There are no issues from a waste safeguarding perspective.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

***Q51 LPR139: Land South of Station Road (Phase 2), Market Bosworth***

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

The site lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

***Q52 LPR70: Land East of Ratby Lane and South of Jacqueline Road, Markfield***

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

The majority of the site lies within a Minerals Safeguarding Area for igneous rock. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including igneous rock, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral

development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. There are no issues from a waste safeguarding perspective.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

***Q53 LPR94 A: Land South of London Road (A Site), Markfield***

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

Part of the site lies within a Minerals Safeguarding Area for igneous rock. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including igneous rock, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. There are no issues from a waste safeguarding perspective.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

***Q54 AS455: Land North of Barton Road, Barlestone***

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

**County Council in its role as landowner**

The proposed allocation of the Land at Barton Road, Barlestone is strongly supported.

The site which is in the sole ownership of the County Council is considered to be suitable, available and deliverable. This has been confirmed by the initial due diligence work that has been undertaken to date. Whilst the site is being promoted

by the County Council rather than a housebuilder it is the County Council's normal practice to bring sites to the market immediately on the grant of an outline planning permission in much the same manner as a private sector land promoter. This model has a successful track record having previously brought forward the initial phase of this development fronting Barton Road, as well as elsewhere across the county.

**Q55 LPR95: Land at Cliffe Hill Farm (Junction 22), Markfield**

This site is a proposed Employment Allocation identified in Policy SP02 of the Local Plan consultation. Strategic employment land should be allocated within existing urban areas, adjacent to existing urban areas or within sustainable locations aligned to the strategic transport network. Please note Appendix B which contains earlier transport comments and the following detailed comments.

The proposed site is adjacent but not within a Minerals Safeguarding Area for igneous rock. The A50 forms the barrier of the safeguarded area. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including igneous rock, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

This proposed allocation is relatively close to the MQP operations at Old Cliffe Hill / Cliffe Hill and Bardon Hill Quarries (albeit the other side of the M1/A50 etc). Consideration should be given to the potential for cumulative impacts and there is therefore a need to ensure that operations at both sites are unconstrained by non-mineral development in line with the LMWLP Policy M11.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

**Q56 LPR22: Land at Wapping and Harrow Farm, Watling Street (A5), Hinckley**

This site is a proposed Employment Allocation identified in Policy SP02 of the Local Plan consultation. Strategic employment land should be allocated within existing urban areas, adjacent to existing urban areas or within sustainable locations aligned to the strategic transport network. Please see response to policy SP02, Appendix B which contains earlier transport comments and the following detailed comments.

The site is partly within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development

within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

***Q57 EMP1: Land at Wiggs Farm, Wood Lane/Station Road, Bagworth***

This site is a proposed Employment Allocation identified in Policy SP02 of the Local Plan consultation. Strategic employment land should be allocated within existing urban areas, adjacent to existing urban areas or within sustainable locations aligned to the strategic transport network. Please see response to policy SP02, Appendix B which contains earlier transport comments and the following detailed comments.

The proposed site is adjacent but not within a Minerals Safeguarding Area for Brick Clay. The B585 forms the barrier of the safeguarded area. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Brick Clay, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. It appears that the allocation is directly adjacent to the waste site at the farm.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

***Q58 LPR44: Land adjoining Hinckley Waste Water Treatment Works (WWTW), Brookfield Road, Burbage***

This site is a proposed Employment Allocation identified in Policy SP02 of the Local Plan consultation. Strategic employment land should be allocated within existing urban areas, adjacent to existing urban areas or within sustainable locations aligned to the strategic transport network. Please see response to policy SP02, Appendix B which contains earlier transport comments and the following detailed comments.

As the land will no longer be needed for operational purposes by Severn Trent from December 2024, the proposed allocation will meet the waste safeguarding criteria in Policy W9 the Leicestershire Minerals and Waste Local Plan (LMWLP).

It is worth noting that there is a live planning application (ref: 2023/CM/0120/LCC) for land immediately adjacent to this site. It is proposed only to treat stormwater in four treatment cells. Therefore, there will still be some waste treatment taking place on the adjacent land, albeit in a very low intervention/intensity way. Proposals will need to align with LMWLP Policy W9 on waste safeguarding.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

***Q59 Other or in general***

No comment.

***Appendix 4: Strategic and non-strategic policies***

***Q60 Strategic and non-strategic policies***

The County Council has focused on commenting on strategic policies only and notes concern regarding the number of smaller proposed allocations put forward for consideration, the cumulative impact of which will be substantial and challenging to deal with in the provision of infrastructure.

***Appendix 5: Evidence Base List***

***Q61 Evidence Base List***

The evidence base list is incomplete (ends at L).

The County Council is aware of the situation and challenges regarding the Joint Transport Evidence being progressed with three other districts in the South of Leicestershire. There are other forms of evidence which are incomplete, for example:

- Gypsy and Traveller Accommodation Assessment to replace the Gypsy and Traveller Accommodation Needs Study 2016
- Strategic Flood Risk Assessment Level 2 (Level 1 in process of being signed off) to replace 2019 and 2020 SFRA
- Renewable Energy Strategy 2014 is unlikely to be valid given technological advancements.
- Habitat Regulations Assessment
- Sustainability Appraisal Scoping report

***Other or General Comments***

***Q62 Other parts of the Local Plan document, or the document in general***

No further comments at this time.

This page is intentionally left blank



## APPENDIX B

### Hinckley & Bosworth Borough Council Draft Local Plan 2020-2039 Consultation Leicestershire County Council Officer Comments Pro-forma (July 2021)

Name:	
Team/Department:	<u>TSaP/E&amp;T</u>

#### Questions posed by H&BBC

	Question	Page/par a number (if relevant)	Comments
1	Overarching/general comments or comments not related to any of the specific questions set out below	General	<p>The Local Highway Authority (LHA) is supportive of the development plan process; whilst providing for the future growth of Leicester and Leicestershire will be challenging in many regards (including in respect of highways and transport), a Plan-led approach offers the greatest opportunities to address those challenges as compared to seeking to deal with the impacts of ad-hoc, 'unplanned' growth.</p> <p>The LHA would therefore wish to see the successful adoption of a new Local Plan for the Borough. However, it has been asked to provide very little input into the Plan's development to date. For example, whilst noting that this draft of the Plan contains no site allocations, the future housing numbers and employment land provision are/will be, presumably, informed by some considerations of potential sites available. In the absence of the LHA having any understanding of those potential sites, there is a risk that some may not be acceptable in principle on highway grounds (for example because they would be contrary to <a href="#">Policy IN5 of the Leicestershire Highways Design Guide</a>). Should that be the case, this would have material implications for the contents of the Plan and/or its deliverability.</p>
		General	<p>Given the influence of rail connectivity on the Borough (via Hinckley Railway Station or stations outside Leicestershire), it is perhaps surprising how little reference is made to rail in this draft Plan. For example, it would be helpful for the Plan to at least to reference the <a href="#">Leicester and Leicestershire Rail Strategy</a>, but a policy that actively supported securing rail improvements serving Hinckley might also be considered.</p>

		General  10	<p>It is also surprising that the Plan does not acknowledge the ongoing Covid-19 pandemic and current uncertainties over the long-term implications this will have on society, including on transport provision and travel behaviour (encompassing trends such as increased home working). Will the emerging evidence relating to these potential long-term implications be reviewed and incorporated as necessary as the development of the plan progresses?</p> <p>The early reference to the Strategic Growth Plan is welcomed in setting the general context in which the new Local Plan is being developed. However, in terms of specifics it is surprising that no reference is made to the fact that the Borough abuts the western end of the A46 Priority Growth Corridor, with cross-boundary implications of growth that will need to be considered.</p>
2	Do you have any comments on the Spatial Portrait of the Borough?	General	See comment below on vision
3	Do you agree with the Plan Vision? If not, what changes do you suggest?	General	<p>The vision is the first (and only?) reference made in the Local Plan to the 'Midlands Engine' (ME). In the light of the vision being that the Borough should be a key part of the ME, it would be helpful if the Spatial Portrait explained the current role of the Borough in the ME and also if the Plan could also set out how that role might change going forward. From a highways and transport perspective, this will be important to understand in terms of likely changes in travel patterns (employees and distribution of materials, goods, etc.) and any transport measures/infrastructure that might be required to enable any such changes.</p> <p>It seems slightly inconsistent to refer within the vision to the borough's role in the ME but not to its role in the Leicester and Leicestershire (L&amp;L) sub-region/housing market area (and by extension, the implementation of the L&amp;L Strategic Growth Plan).</p> <p>It is also suggested that the vision should include explicit reference to the environment and associated key aspirations for the Borough, especially in respect of the climate emergency.</p>
4	Do you agree with the Spatial	General	Having referred to the Strategic Growth Plan in the introduction chapter, and to the Midlands Engine in the spatial vision, it is surprising that neither of these key strategic challenges/aspirations are acknowledged

	objectives? If not, what changes do you suggest?	19	<p>through the spatial objectives. It is suggested that one or more additional objectives be included to cover these points.</p> <p>Objective 3 (Infrastructure) refers to meeting the “...future infrastructure needs of the borough...”. In the context of the SGP (and equally Midlands Engine) however, it will increasingly be necessary for individual districts/LPAs to consider future transport infrastructure requirements on a cross-boundary, cumulative basis (recognising where the provision of new/improved transport infrastructure in one district will also be critical to unlock/support growth in other, neighbouring districts, or even neighbouring HMAs - e.g. the importance of the A5 corridor to growth across Hinckley and Bosworth, other areas of Leicestershire, and adjacent districts within Warwickshire/the West Midlands). It is suggested that the objective be amended to reflect this.</p> <p>Objective 7 (Climate Change) – it is suggested that the wording of this objective could be strengthened to better reflect the context of recent national/local ‘climate emergency’ declarations and associated policies/priorities (conversely, the current form of wording feels a bit ‘weak’/‘out-of-date’ in relation to this).</p>
5	Do you support the preferred strategy for growth set out above for the local plan? If not, what do you consider would be a reasonable alternative strategy for growth?	General	<p>In the current absence of any formally published comprehensive transport evidence base and information about potential sites, it is not possible for the Local Highway Authority (LHA) to express a definitive view at this time on the preferred strategy.</p> <p>However, from its knowledge and through its involvement with the development of Local Plans for areas adjoining the Borough (including Charnwood, Blaby and the City of Leicester), the LHA would make the following observations that are likely to have material implications for arriving at a preferred strategy:</p> <ul style="list-style-type: none"> <li>• The A5 in the Hinckley area is already failing functionally, in terms of its capacity and disruption caused by the frequent rail bridge strikes. It is possible that without a strategic scale intervention, the corridor’s ability to enable further growth will be significantly limited. Without such intervention, the impacts of growth would likely result in the displacement of traffic to far less suitable and appropriate routes within and around Hinckley and across the boundary in Warwickshire (e.g. impacting on Nuneaton).</li> <li>• The M1 between Junction 21 and 21a and the Leicester Western Bypass from J21a around to the Hobby Horse roundabout at Syston (both parts of the Strategic Road Network –SRN) are also failing functionally. The highways impacts of any proposals for growth, especially towards the north east of the Borough, are likely to have a material impact on these parts of the SRN, which when combined with the</li> </ul>

		<p>cumulative impacts of growth proposed in adjoining areas, is likely to prove challenging, complex and costly to address.</p> <ul style="list-style-type: none"> <li>• Notwithstanding the proposed Major Road Network project on the A50/A511 corridor, there is evidence (emerging from other Local Plan work) to suggest that further measures are likely to be required along the corridor to ensure that it can continue to play its relevant role in enabling growth and in providing access to jobs and key services and facilities in the City of Leicester.</li> </ul> <p>Regardless of the eventual preferred strategy, it is likely that a coordinated, strategy-led approach will be required to address the transport challenges of seeking to accommodate further growth (housing and employment) in the Borough, one involving cross-boundary coordination and cooperation (within and without Leicestershire) and including Highways England. The LHA would expect the Plan to provide policies and text that underpin this approach and provide a robust basis for seeking developer contributions towards mitigating measures to address cumulative impacts within and without the Borough/Leicestershire.</p> <p>The LHA also notes the emerging Local Plan’s continued reliance on the Barwell and Earl Shilton SUEs as principal strategic sites for meeting the Borough’s future housing growth requirements. Whilst the principle of the two SUEs was established through the 2009 Core Strategy, it is noted that development has yet to commence at either site. Furthermore, the draft Plan indicates that housing delivery across these two sites during the emerging plan period (i.e. 2020-2039) will be less than half the total allocated through the 2009 Core Strategy. Additionally, the draft Plan indicates that the total housing growth envisaged at the Earl Shilton is now significantly lower than the original allocation set out within the 2009 Core Strategy. All of the above has potentially significant implications for:</p> <ul style="list-style-type: none"> <li>• The delivery of supporting transport infrastructure previously committed to through the 2009 Core Strategy.</li> <li>• The cumulative impacts of the Barwell/Earl Shilton SUEs when considered in conjunction with other planned (or potential future) developments within and without Hinckley and Bosworth Borough (recognising the substantial changes that have taken place in this respect since 2009).</li> <li>• In light of the preceding point, the specific transport infrastructure required to address these cumulative impacts.</li> </ul> <p>Given these changes and potential wider implications, has consideration been given to the inclusion of updated policies for the two SUEs within the draft Plan?</p>
--	--	---

			(NB: LHA comments in respect of the Plan’s viability are provide in response to Q33.)
	Other Comments on Chapter 4 – Spatial Development Strategy	General  24-25          30 (para 4.21)	<p>The chapter makes only passing reference to the Strategic Growth Plan in paragraph 4.14, despite the potentially significant implications this could have for the borough’s future growth and infrastructure requirements.</p> <p>Comments on proposed spatial hierarchy:</p> <ul style="list-style-type: none"> <li>• Will the ongoing review of the spatial hierarchy consider the implications of the Strategic Growth Plan on the proposed categories and allocation of specific settlements to each category? In particular, the current spatial hierarchy is silent on either the “Priority Growth Corridor” or “A5 Improvement Corridor” as identified through the SGP and consequently unclear as to how it aligns with this.</li> <li>• Has consideration been given to identifying Groby and Ratby in a separate ‘Edge of Leicester Urban Area’ category, given their much closer physical proximity, stronger transport links and resulting ‘satellite settlement’/‘dormitory community’ characteristics in comparison to the other settlements across the borough identified as ‘key rural centres’?</li> </ul> <p>The text states that the 2021 SHELAA as being published alongside the draft Local Plan, whereas the document that has actually been published is the 2020 SHELAA.</p>
6	We consider a new settlement will be required to help meet future growth needs in the borough. How can this best be reflected in policy?		<p>It will be important that any new settlement is of a scale that ensures it will contain a range of economic and social services and facilities that means it is likely to function as a true ‘free standing’/largely self-contained community, or alternatively is located close to existing urban areas (and associated services and facilities) in locations accessible via sustainable modes of travel, as opposed to becoming a car-oriented dormitory housing estate.</p> <p>From a transport perspective, it would be very helpful if the new Plan could at the least identify (under-pinned by evidence) the likely area of the Borough in which any new settlement may be located in the future. It would also be helpful if the Plan could set out the ‘journey’ by which proposals for the new settlement (and supporting measures and infrastructure) will be developed and how, in the meantime, any proposals that might come forward that could hamper or frustrate delivery of the new settlement (or potential infrastructure required to enable it) will be dealt with.</p>

7	Do you agree with the approach to mitigating and adapting to climate change?	32-33  General	<p>The LHA has no objection to the overall approach proposed, but it is suggested that paragraph 5.4. could be strengthened by adding an extra bullet point covering: "provision of infrastructure/facilities to support low and zero-carbon vehicle technologies (e.g. electric vehicle charging points)."</p> <p>Additionally, it is suggested the chapter and planned approach should be reviewed and updated as necessary in light of the Government's recently published Transport Decarbonisation Plan:  <a href="https://www.gov.uk/government/publications/transport-decarbonisation-plan">https://www.gov.uk/government/publications/transport-decarbonisation-plan</a></p>
8	Once site allocations are set out in the next draft of the Local Plan the policy CC02 will include a list of those site allocations which will need to address recommendations made in the Borough Council's Strategic Flood Risk Assessment Level 2. Do you agree with this approach?		No view.
9	Do you support the overall proposed strategy for high quality design in the borough? Are there any other	43 to 45	<p>The Local Highway Authority (LHA) recognises the role that high-quality design can play in respect of providing safe, healthy and attractive environments, and that reflect local distinctiveness.</p> <p>However, like very many other authorities across the country the LHA has insufficient funding to maintain even its most important highway assets (such as its most heavily trafficked A roads) and accordingly does not have the funding to maintain non-standard materials; bespoke street furniture; trees in the highway; or other such elements that might be used to create high quality environments. Thus, the LHA would like to see the policy</p>

	issues the policy should address?		<p>amended such that those promoting the use of such elements in a new development are required to provide a supporting strategy for their long-term maintenance.</p> <p>Additionally bullet point (e) of the proposed policy, specifically the section that refers to: "...including electric vehicle charging points <u>where feasible...</u>" is a bit weak (i.e. implies that EV charging points are 'nice to have' rather than essential infrastructure) and should more strongly articulate the need for EV charging points to be a standard feature of all new developments (with any exceptions being very rare).</p>
10a	Should the Active Design and Travel Policy apply only to new residential development or should other development types be included?	48 to 51	<p>Given that the title of the policy includes 'Active Travel' it is unclear what the justification is for confining its application solely to new residential developments. The policy should also be applicable at least to employment developments and other types of development that are likely to generate significant numbers of employees and/or visitors.</p>
	Other comments on the proposed Active Design and Travel Policy and supporting text.	48 to 51	<p>It is surprising that no reference is made to the Government's latest 'Gear Change' vision for cycling and walking (published in 2020: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf</a>).</p> <p>In relation to this, the policy and/or supporting text should reference the need to develop proposals in accordance with the Government's latest Cycle Design Guidance (LTN 1/20).</p>
10b	Is the threshold of 10 or more residential dwellings appropriate?	51	<p>The LHA has no definitive view on the appropriateness of the proposed threshold as this will presumably need to take account of a range of wider factors (including viability).</p> <p>However, it is suggested that any such threshold should not apply to requests for 'passive provision' (e.g. the safeguarding of land within a development) to facilitate future active travel infrastructure by the LHA or other third-parties, as such a requirement could in certain circumstances be appropriate for developments of less than 10 dwellings.</p>

11	Should the housing mix policy apply to all residential developments or only to developments of 10 or more dwellings?		No view.
12	Do you agree that the nationally described space standards should apply to all new dwellings?		No view.
	Comment on Policy HO04 – Housing Density	64-65	It is suggested that the second sentence of the policy should be amended as follows (additional text underlined): <i>“However, unless justified through principles of good design <u>and/or essential infrastructure requirements</u>, to ensure the efficient use of land...etc.”</i>
13	How can the emerging national design code guidance on density be better incorporated into the policy on housing density?		No view.
	Comments on Policy HO05 – Accessible Housing and supporting text	67 (para 7.14)	The LHA would question whether "pepper potting" such dwellings around larger sites is necessarily the best approach to meeting accessible housing needs, at least from a transport perspective. In this regard, it would potentially make more sense to locate accessible dwellings on such larger sites as close as possible to existing or planned public/passenger transport routes and stops, to minimise walking distances and thereby maximise the ability of accessible housing occupants to use these services.



			Equally, there may be transport (and possibly wider) benefits to clustering accessible dwellings together within larger sites, in terms of supporting the efficient provision of specialist/targeted (e.g. social care) transport services to such dwellings where required.
14	Do you agree with the policy approach to Self and Custom build housing?		No view.
15a	Do you have any comments on the criteria based approach to Gypsy, Traveller and Travelling Showpeople accommodation set out in the policy?		No view.
15 b	If the accommodation assessment identifies an evidenced need to allocate land for Gypsy, Traveller and Travelling Showpeople accommodation should this be through the local plan or a separate		No view.

	Development Plan Document?		
16a	Do you have any comments on the broad approach to securing affordable housing?		No view.
16b	Where 100% affordable housing schemes are proposed and supported with Affordable Homes Grant from Homes England should they be exempt from providing other planning contributions as explained in the supporting text to the policy?	75	As planning contributions are sought to fund transport (as well as other) infrastructure and services that are necessary to support the development, it will be necessary to identify how any exemptions applied will be funded and delivered through other sources should this proposal be taken forward.
17	How can the Local Plan best deliver the necessary employment land and premises required to meet its identified needs?	79 and 80	It is difficult to answer this question in the absence of an identified employment need or potential site options for meeting this need. However, the proposed policy <i>EP01 – Scale and distribution of new employment sites</i> correctly identifies transport as a key factor in deciding the best locations for new 'strategic' employment development and the LHA would therefore welcome the opportunity to engage/input to the appraisal of sites for potential inclusion in the emerging Local Plan. The Plan should be underpinned by an evidence base, including in respect of highways and transport, that assesses the impacts of potential employment sites and identifies appropriate mitigation, including to address cumulative impacts.

		<p>From its knowledge and through its involvement with the development of Local Plans for areas adjoining the Borough (including Charnwood, Blaby and the City of Leicester), the LHA would make the following observations that are likely to have material implications in respect of potential new employment sites:</p> <ul style="list-style-type: none"> <li>• The A5 in the Hinckley area is already failing functionally, in terms of its capacity and disruption caused by the frequent rail bridge strikes. It is possible that without a strategic scale intervention, the corridor's ability to enable further growth will be significantly limited. Without such intervention, the impacts of growth would likely result in the displacement of traffic to far less suitable and appropriate routes within and around Hinckley and across the boundary in Warwickshire.</li> <li>• The M1 between Junction 21 and 21a and the Leicester Western Bypass from J21a around to the Hobby Horse roundabout at Syston (both parts of the Strategic Road Network – SRN) are also failing functionally. The highways impacts of any proposals for growth, especially towards the north east of the Borough, are likely to have a material impact on these parts of the SRN, which when combined with the cumulative impacts of growth proposed in adjoining areas, is likely to prove challenging, complex and costly to address.</li> <li>• Notwithstanding the proposed Major Road Network project on the A50/A511 corridor, there is evidence (emerging from other Local Plan work) to suggest that further measures are likely to be required along the corridor to ensure that it can continue to play its relevant role in enabling growth and in providing access to jobs and key services and facilities in the City of Leicester.</li> </ul> <p>It is likely that a coordinated, strategy-led approach will be required to address the transport challenges of seeking to accommodate further growth (employment and housing) in the Borough, one involving cross-boundary coordination and cooperation (within and without Leicestershire) and including Highways England. The LHA would expect the Plan to provide policies and text that underpin this approach and provide a robust basis for seeking developer contributions towards mitigating measures to address cumulative impacts within and without the Borough/Leicestershire.</p> <p>In relation to the matters covered in paragraphs 8.7 to 8.9, maintaining the ability to regulate changes in employment use/type as far as possible will be important to ensure that where this is likely to result in significant changes in transport impacts/requirements, such changes can be assessed and where necessary mitigated. As such, any mechanisms provided within the Local Plan policies that facilitate this are welcomed.</p> <p><b>(NB: LHA comments in respect of the Plan's viability are provide in response to Q33.)</b></p>
--	--	---

	Comment on Policy EP02 – New Employment Development	80-81	For bullet point (c) – suggest replacing “bus” with “passenger transport” (to reflect that options other than conventional bus services, such as rail or demand responsive transport, may also have a role to play in providing access to new employment sites).
18	Should some key employment areas/premises that are of particular significance to Hinckley & Bosworth’s portfolio of employment areas be afforded additional protection over and above category A areas? If so, should this include all category A areas, some category A areas, or a mixture of category A & B areas? What extra evidence would be needed to warrant this special policy designation?		No view.
19	Do you have any comments on the planning for Strategic	87 and 88	Strategic Distribution developments normally have widescale highways and transport impacts in respect of employees’ origin and of the movement of goods and materials. Thus, the impacts of any sites within the Borough are likely to spread beyond its boundaries/the boundary of Leicestershire. The Plan should recognise

	Distribution developments in Hinckley and Bosworth, and how local policy could be formulated?		<p>this and provide a robust policy basis for addressing widescale impacts, including on a cumulative, cross-boundary basis as necessary.</p> <p>The process of identifying future strategic distribution needs and locations through the Local Plan will need to consider how such needs and locations might be influenced by the SGP and associated growth in neighbouring LPAs. Similarly, it will need to take account of the potential implications of the HNRFI, should this be approved through the NSIP process.</p>
20	Taking into account the recent creation of Class E planning uses and the implications for employment uses and sites/premises, what changes if any do you think should be made to the Economic Prosperity section and policies?	89 (para 8.30)  91 and 92	<p>Paragraph 8.30, relating to Policy EP06 (MIRA Technology Enterprise Zone) and supporting text, identifies who HBBC will engage with to determine the boundary for the special policy area and specific aspirations for growth and development. In relation to this, it is suggested that it will be equally important to involve the relevant highway/transport authorities (Leicestershire CC, Warwickshire CC and Highways England) in any discussions concerning the special policy area boundaries given the potential implications for the strategic and local road networks and any future transport infrastructure aspirations in and around the area (e.g. in relation to the A5).</p> <p>Additionally, whilst there is not a question that explicitly references the proposed Hinckley National Rail Freight Interchange (HNRFI) proposal, nevertheless the Local Highway Authority (LHA) wishes to make some observations in relation to this. The LHA recognises that the HNRFI remains a proposal at this time; that it will be subject to the Nationally Significant Infrastructure Project (NSIP) process; and that no NSIP application has yet been submitted by its promoters. It is therefore, perhaps to some extent, understandable that the draft Plan contains little in respect of the HNRFI. However, from experience with the East Midlands Gateway site (near Castle Donington) <i>if</i> the HNRFI is permitted and developed it is likely to have a very significant highways and transport impact and thus could have a material implications for the deliverability of sites that will (ultimately) be included in the new Local Plan. It is therefore surprising that this draft Plan does not include or suggest the need to include in its next version a Policy in respect of triggering a review of the Plan should the HNRFI gain approval.</p>
21a	Should policy define the expected extent of search for sequentially preferable sites? As a minimum, the		No view.

	<p>nearest Town, District or Local Centre should be assessed. Further options could include always assessing Hinckley Town Centre, assessing all Town, District and Local Centres in the Borough, using development size thresholds or using catchment area distances, which could also include defined centres of neighbouring local authorities.</p>		
21b	<p>Should permissions for E use in or edge of centre be conditioned to exclude light industry (the former B1c use)?</p>	97	<p>Yes – the LHA would support a policy approach that helps to regulate any changes of use that are likely to have significant implications from a transport perspective.</p>
21c	<p>Where retail use is proposed in-centre, should it be conditioned to</p>	97	<p>Yes – the LHA would support a policy approach that helps to regulate any changes of use that are likely to have significant implications from a transport perspective.</p>

	prevent Change of Use to other E class uses?		
21 d	Where particular non-retail E class uses can pass the sequential test and be permitted because they require large site footprints difficult to accommodate in-centre, should they be subject to conditions restricting change of use to retail?	97	Yes – the LHA would support a policy approach that helps to regulate any changes of use that are likely to have significant implications from a transport perspective.
22a	What should the role of Policy TDC02 be if the Government introduces a permitted development right to change Class E use to Class C3 (residential)?		No view.
22 b	Should the borough consider the use of an Article IV	97 to 99	Yes – the LHA would support a policy approach that helps to regulates any changes of use where this is likely to significantly reduce access to key services or facilities via sustainable modes of travel, and could thereby adversely affect the sustainability of an existing settlement and/or wider planned development.

	Direction to help protect any particularly valuable Town Centre uses?		
22c	Is there a role for Primary and/or Secondary Shopping Frontages to help with the definition of key locations at ground floor level in Policy TDC02? If so, should primary and secondary frontages be defined for the District Centres (as recommended in the Town and District Centres Study 2017) or any other centre?		No view.
	Comment on Policy TDC03 – Hot Food Takeaways and Betting Offices	100	It is suggested that bullet point (b) should be widened to include traffic and parking (or alternatively an extra bullet point added to cover residual traffic impacts).
23	Could the measure of “over-proliferation” of		No view.



	facilities be improved and does the measure need to be individually tailored to suit centres in different levels of the centre hierarchy?		
24	Are the criteria for safeguarding against the loss of public houses in urban and rural areas reasonable and proportionate and are there any other criteria the Borough Council should include to safeguard against the loss of public houses?	105 to 108	<p>The LHA has no views or suggestions on the specific criteria to be applied in relation to this.</p> <p>Nevertheless, the LHA would support a policy approach that helps to regulate any changes to the use of public houses and/or other key community facilities where this is likely to significantly reduce access to such facilities via safe and sustainable modes of travel, and could thereby adversely affect the sustainability of existing settlements and/or planned developments.</p> <p>Equally, the LHA would support policy provisions that facilitate the diversification of public houses where this is likely to positively contribute to the range of key services and facilities accessible via safe and sustainable forms of travel and thereby encourages safe and sustainable travel behaviour.</p>
25	Do you have any comments on the approach to Heritage and Conservation?		No view.
26	Do you support the approach to green	125 to 127	The Local Highway Authority (LHA) has no objection to the general approach/principle of the planned green wedges, but suggests that an additional bullet point/category be added to those listed under the sentence

	wedges set out in the policy?		beginning: <i>"The following land uses will be acceptable in the Green Wedge..."</i> covering: <i>"other, essential transport infrastructure"</i> .
27	Do you agree with the 'major developments' threshold set out in the biodiversity policy or should a different threshold be applied for the additional biodiversity gains measures?		No view.
28	Do you have any comments on the policy for development within the countryside?	141 to 144	It is suggested that an additional <i>bullet point should be added to the policy under "Development in the countryside will be considered sustainable where..."</i> stating:  <i>"residual traffic and transport impacts are addressed, as necessary, in accordance with policies HT01 to HT04*"</i> .  *NB – policy references listed here are notwithstanding our later comments on the proposed transport chapter/policies.
29	Do you agree with the approach to highways and transportation set out in policy HT01?	150 and 151	The principle of a Plan policy in respect of highways and transportation is welcomed and something that the Local Highway Authority (LHA) supports.  In the current absence of any formally published comprehensive transport evidence base and information about potential sites, it is difficult for the LHA to comment definitively on whether the Policy and supporting narrative are likely to be sufficiently robust in terms of dealing with the impacts of further growth in the Borough, especially cumulative impacts and seeking to secure funding (including from developers), which could be considerable in quantum.

		<p>But, reflecting its comments on other aspects of the draft Plan<sup>(1)</sup>, the LHA’s preliminary view is that the policy and text is too generic and is unlikely to provide a sufficiently robust basis for seeking developer contributions towards mitigating measures to address cumulative impacts within and without the Borough/Leicestershire. The LHA would welcome the opportunity to work with HBBC and other relevant partners to review jointly the evidence work to date; to support HBBC in undertaking work to explore options for and pathways towards the delivery of required highways and transport mitigation measures (including to address cumulative and cross-boundary impacts); consider how this might impact on assumptions about potential sites to be included in the next version of the Plan; and also to review how this affects the contents of the Plan, including policy HT01.</p> <p>A particular issue that will ultimately need to be addressed is how the Local Plan will incorporate/respond to ongoing and planned work to support the Strategic Growth Plan (SGP) and the emerging Local Plans of adjacent districts in and around the SGP ‘Priority Growth Corridor’, noting that this work could identify a need for significant changes to the Plan in transport terms (e.g. transport mitigation measures identified to accommodate the Local Plan could be superseded by ‘bigger’ mitigation requirements to deal with wider growth identified through the SGP/adjacent Local Plans). Correspondingly, if the Local Plan is to be submitted prior to the conclusion of the SGP transport work, the LHA considers that it would need to include a policy setting out an appropriate review trigger/mechanism to ensure that the Plan is updated as necessary to reflect the outcomes of the SGP and adjacent Local Plans work as and when this emerges (i.e. as per the suggested approach to the HNRFI set out in the LHAs response to Q20).</p> <p>In respect of more detailed aspects of the Policy and supporting text:</p> <ul style="list-style-type: none"> <li>• It is a notable absence that no reference is made in the text to the Strategic Road Network and the roles and responsibilities of Highways England (albeit there is mention in text that supports policy HT04).</li> <li>• The wording of the Policy uses phraseology that is inconsistent with that of the National Planning Policy Framework (NPPF), e.g. “... <i>residual cumulative impacts of development on the transport network are <b>not significant</b>...</i>” whereas the NPPF states: “...<i>or the residual cumulative impacts on the road network <b>would be severe</b>...</i>”</li> <li>• The lack of reference to the Government’s (cycling and walking) ‘<a href="#">Gear Change</a>’ document and to its national bus strategy ‘<a href="#">Bus Back Better</a>’ is surprising. It would be helpful to cross reference the LHA’s <a href="#">passenger transport policy and strategy</a> and also to its new <a href="#">Cycling and Walking Strategy</a>.</li> </ul>
--	--	---

			<i>(1) Especially the LHA's view that it is likely that a coordinated, strategy-led approach will be required to address the transport challenges of seeking to accommodate further growth (employment and housing) in the Borough, one involving cross-boundary coordination and cooperation (within and without Leicestershire) and including Highways England. The LHA would expect the Plan to provide policies and text that underpin this approach and provide a robust basis for seeking developer contributions towards mitigating measures to address cumulative impacts within and without the Borough/ Leicestershire.</i>
	Comment on Policy HT02 – Parking Standards	152	It is suggested that policy HT03 should be cross-referenced within HT02 to clarify that EV charging facilities are covered separately.
30	Are there any other locations or criteria you think would be acceptable to support the delivery of HGV parking facilities?	152 and 153	<p>The Local Highway Authority (LHA) would expect the need for HGV parking facilities to be driven by evidence, including in respect of additional demand generated by any future sites allocated through the emerging Local Plan and/or growth in neighbouring areas. At the time of writing, there is insufficient evidence or knowledge of such potential growth in and around the Borough to comment on possible increases in locally generated HGV parking demand that might arise.</p> <p>That said, it is possible that there could be pressure/need for additional HGV parking facilities in those parts of the Borough located around or closest to the A5, A42/M42 and M69 corridors (noting that most of the M69 is either within or very near to the Borough and that whilst the A42/M42 does not pass through the Borough, it similarly passes very close by at certain points) arising from strategic/long distance HGV traffic using either of these routes .</p>
31	Should the policy set different electric vehicle charging infrastructure requirements for different types of non-residential uses, for example rapid charging	153 to 156	<p>It seems logical that the type of EV facilities provided should be aligned with anticipated demand in terms of length of stay; i.e. an emphasis on 'rapid'/'ultra-rapid' chargers for short-stay uses/facilities and on relatively slower/'standard' chargers for long-stay uses/facilities.</p> <p>However, it is less clear why the proportions of overall parking spaces to be either 'actively equipped' with EV charging facilities of one form or another, or 'passively equipped' for future provision, should differ from one form of development to another, given the vastly expanded EV charging provision that will be needed in most locations in future to support the mass transition to EVs.</p> <p>It is suggested that the policy should include a starting point of seeking passive provision as a minimum for <b>every</b> new off-street parking space provided within all new developments (both residential and non-residential),</p>

	points at commercial/retail developments or more charging points at long stay locations such as employment sites?		<p>other than in exceptional circumstances (i.e. so that any parking spaces that are not actively equipped with EV facilities from 'day one' can be equipped with such active facilities at minimum cost/disruption as demand rises in future).</p> <p>On-street/ off-street charging needs to be backed up by a range of other solutions, hubs, destination charging as well as sustainable alternative transport modes, such as passenger transport and cycling and walking as fall-back options.</p> <p>There is a need to focus on where people are stationary for long periods of time and allow the EV chargers to utilise this so that there is then less emphasis on public chargepoints.</p>
32	Do you agree with the approach of seeking to safeguard land along the A5 corridor? Are there any constraints or issues which could preclude the Council, in conjunction with the A5 Partnership, from safeguarding this land?	156 to 158	<p>Whilst the principle of an A5 specific policy is welcomed, it is not apparent from the way that it is presently drafted that its intention is to seek to safeguard land for the future strategic upgrade of the A5 through the Borough. Options for the route's upgrade adjacent to Hinckley appear to be extremely limited and the LHA would welcome any planning policy protection that could be afforded to seeking to safeguard the route's upgrade. Were the opportunity to be lost to achieve the route's upgrade, this would likely have a material impact on the ability to deliver any further growth (including expansion of existing facilities, e.g. at MIRA) in the A5 corridor (within or without the Borough/ Leicestershire).</p> <p>Additionally, and notwithstanding any actions pursued through the A5 Partnership, any policy to secure developer contributions and safeguard land for the future upgrade of the A5 within Hinckley and Bosworth's emerging Local Plan would need to be 'mirrored' by equivalent provisions in the Local Plans of adjacent Warwickshire Districts to be fully effective. The LHA would wish to be involved in any future discussions with the relevant local planning authorities and other highway authorities (i.e. Warwickshire County Council and Highways England) to advance a coordinated approach to these matters through the various Local Plans.</p> <p>Whilst evidence has yet to be published that definitively links the enabling of growth (in the Borough and more widely) to the need for the A5's strategic upgrade, based on knowledge of the corridor's current functionality a link is likely to be demonstrated. In that respect, whilst it is understandable that due to the corridor's relative importance – e.g. as identified in the Strategic Growth Plan – the Plan as drafted treats it separately from the local road network (i.e. separate from HT01), in other respects it, i.e. the LHA's view that a coordinated, strategy-led approach will be required to enable growth, it would be more appropriate not to treat it separately. A compromise could be to redraft and combine the text supporting HT01 and HT04 and then renumber HT04 as</p>

			<p>HT02, such that Policy HT01 and ‘new’ HT02 follow directly on from the redrafted text. In redrafting the text it is suggested that reference to the low railway bridge and the issues arising from its frequent striking should be referenced.</p> <p>Additionally, if (when) a link is demonstrated between the delivery of growth and the A5’s strategic upgrade, the current draft text referencing funding is weak and may call into an Inspector’s mind whether the Plan is ‘sound’ and deliverable. Challenges to growth presented by Strategic Road Network impacts are becoming increasingly common for Plans being developed across the wider Housing Market Area, and so it will be important to continue to work jointly with Highways England (and other partners as relevant) to identify and agree a suitable way forward; ensuring that there is a coordinated approach to dealing with SRN impacts underpinned by a Plan that contains a coherent narrative about the infrastructure delivery ‘journey’ is likely to be important to agreeing the way forward.</p> <p>With regard to the specific wording of the draft policy HT04 (as currently numbered)</p> <ul style="list-style-type: none"> <li>• Although welcomed, it is unclear why just cumulative impacts are covered. Given the poor functionality of the corridor, it is highly probable that even the impacts of a single development could have a material impact.</li> <li>• As per the LHA’s comments on Policy HT01, the wording of HT04 is inconsistent with that used in the National Planning Policy Framework.</li> </ul>
33	Should the policy be amended to reflect emerging Government proposals for infrastructure funding and planning gain set out in the Planning White Paper?	159 to 162	<p>Whilst there is not a question that explicitly references the affordability of infrastructure and the Plan’s viability, nevertheless the Local Highway Authority (LHA) wishes to make the following observations.</p> <p>Although there is a current absence of any formally published comprehensive transport evidence base and information about potential sites, from its knowledge and through its involvement with the development of Local Plans for areas adjoining the Borough (including Charnwood, Blaby and the City of Leicester), there are likely to be some considerable highways and transport challenges in seeking to accommodate further growth in the Borough (as highlighted in LHA’s responses to questions relating to the preferred housing strategy and delivery of employment land).</p> <p>The costs associated with addressing these challenges could be significant – especially where delivery of growth is reliant on addressing issues on the Strategic Road Network (including the M1, A5 and A46). Should it be that</p>

		<p>the costs of addressing issues were to rest solely with developers, there is a risk that this would render the Plan unviable. It will be important, therefore, for HBBC to work jointly with the LHA, Highways England and other highway authorities as necessary (e.g. Warwickshire County Council) to continue to develop evidence that identifies the impacts of its Plan proposals for growth; to identify the mitigating measures and infrastructure regard to enable that growth; and to identify and agree with the highway authorities appropriate delivery pathways and potential funding sources.</p> <p>It is the LHA's anticipation that what is agreed will be reflected in the Plan in terms of a narrative for the infrastructure delivery 'journey' that we are on and the coordinated, strategy-led approach required towards the development and delivery of projects. In this context, there is a notable absence of any specific reference to the need for developer contributions towards addressing cumulative and cross-boundary impacts and associated infrastructure requirements within either the proposed infrastructure and delivery policy or supporting text.</p>
--	--	---

This page is intentionally left blank