

Appendix

Submitted Leicestershire County Council officer response to Hinckley and Bosworth Borough Council's New Directions for Growth Consultation

General points relating to clarity, structure and lack of liaison are referred to prior to alignment with the L&L Strategic Growth Plan, more detailed responses to the six questions posed as part of the consultation and reference to ecology observations.

1. It is not particularly clear that this forms an **additional** consultation, further to H&BBC's Scope, Issues and Options consultation undertaken in early 2018. This is potentially misleading and confusing as it is not clear that the other options previously consulted on are options which may be pursued in the next Local Plan.
2. The six questions posed potentially lead the reader rather than encourage open responses to the three broad directions for growth. This needs to be recognised in the analysis of the responses and caveated accordingly.
3. It is disappointing that HBBC has not discussed with the County Highway Authority it's early stages of plan making as this is the most conducive way of developing a robust transport evidence base and proportionate package of supporting transport requirements, which are key considerations to the 'soundness' of the plan.

Strategic Planning matters: Alignment with the L&L Strategic Growth Plan (SGP)

4. Of the three options put forward in this consultation, developing on the edge of Hinckley, to the north west of the town, alongside the A47 would represent the most sustainable solution. The other two options are not considered to be compliant with the SGP.
5. Although it is recognised that Local Plans are required to consider all reasonable alternative options through the Sustainability Appraisal process, it is considered that explanation should have been given that two of the possible broad directions for growth do not align with the steer provided by the SGP. HBBC is the first authority to consult on an emerging Plan following agreement of the SGP and it is crucial that the strategy is not undermined at the first opportunity.

Q1 Do you consider the urban area of Hinckley, Burbage, Earl Shilton and Barwell suffers from transport and infrastructure challenges? If so please explain what you consider the issues to be.

6. The County Council has invested very substantially in transport infrastructure improvements across the existing urban areas of the Borough over the past decade and have worked closely with the Borough Council to deliver new growth in these areas. This has included the delivery of the Earl Shilton bypass (to

support the planned Sustainable Urban Extensions within the Borough's existing Core Strategy) and a major package of improvements to walking and cycling infrastructure across Hinckley. Most recently, the County Council has proactively bid for and secured further investment to improve two key junctions in the town (Hawley Road/Rugby Road and Brookside/Rugby Road) with work on these junctions due to commence in 2020. In light of this, the tone and leading nature of question one is surprising and disappointing.

7. Notwithstanding this, it is acknowledged that there are inherent physical constraints within the established urban areas of the Borough (especially in and around Hinckley town centre) which mean the scope for and/or practicality of further major enhancements to highway capacity within these areas is likely to be limited. It would be surprising if this was not a significant consideration in the development of the Local Plan, albeit that would need to be given in context of the situation elsewhere in the County; i.e. whilst Hinckley has its fair share of transport issues and congestion, it is neither atypical nor the worst performing of the County's market towns (e.g. as shown in the County Council's published 'Transport Trends in Leicestershire' reports).
8. Moreover, the urban areas are amongst the best located areas of the Borough for the strategic road and rail networks and stand to benefit most from the new and improved links planned as part of the Strategic Growth Plan and Midlands Connect Strategy (including the A46 expressway, A5 improvements and enhanced rail links to Coventry and Birmingham). Whilst the timing of this new strategic transport infrastructure and the nature of any wider supplementary transport measures required are currently uncertain, carefully considered growth in and around the established urban areas of the Borough has the potential to support this.
9. Additionally, these areas offer the greatest opportunities to utilise and enhance existing walking, cycling and public transport options, and by extension to maximise access to jobs and services. Strategic growth away from the established urban areas (including any new 'standalone' settlement options) would need to be of a very substantial scale to provide comparable accessibility to jobs and services and replicate levels of sustainable travel behaviour.
10. The urban area remains the most sustainable location for growth in the Borough, and there are opportunities for further sustainable growth at Hinckley. A key consideration for H&BBC should continue to be the location of development where future residents can enjoy easy access to key services and facilities include employment opportunities. It is therefore important that development continues to focus on the Hinckley Urban Area.

Q2 Should the authority explore other options for growth beyond the existing urban area? Do you support this and if so why.

11. Of the three options put forward, developing on the edge of Hinckley, to the north west of the town, alongside the A47 represents the most sustainable solution.
12. The recently approved SGP identifies the A5 improvement corridor as a project to alleviate congestion. This presents an opportunity for future growth. Significant housing and employment growth is proposed in Nuneaton and Bedworth BC and North Warwickshire DC, to the south of the A5. If development were proposed in this location there would be an opportunity to lever in S106 funding to help pay for the upgrade of the A5, which in turn will help with making the case to government for funding the additional works.
13. It is noted that there may be opportunities for growth on land to the east of the IM Properties site (east of the M69). This site's proximity to the employment opportunities being created by the new DPD hub and other businesses will help to reduce the need for residents to travel.

Q3 If you consider the authority should explore options for growth beyond the existing urban area, within which broad areas identified on Map 3 should we focus on, and why?

14. Of the three options put forward, developing on the edge of Hinckley, to the north west of the town, alongside the A47 represents the most sustainable solution.
15. The M42 opportunity area is rural in character and remote from other settlements or public transport corridors. Other constraints in this area include the National / Charnwood Forest and land within Flood Zones 2 and 3. The HS2 route runs to the east of the M42, which could constrain development.
16. Growth in the 'M42 opportunity area' and the 'North East connections to Leicester' would not align with the aspirations for growth as shown on Figure 7, page 22 of the approved SGP.
17. Promoting strategic growth in locations away from established urban areas is unlikely to be straightforward from a transport perspective and in fact could turn out to be much more expensive and complex than expected. Notwithstanding this, the 'areas of search' for such growth options should be consistent with the SGP and support the delivery of associated transport infrastructure (including the key priority corridors forming part of the wider Midlands Connect Strategy).
18. Of the three potential directions for growth identified within the consultation, the 'North West of urban area' is the only one that obviously aligns with this principle. Noting the location of this potential direction for growth it is likely that, in transport terms at least, growth in this area would be likely to function as an extension of or dormitory community for the established urban area of the district rather than as a

genuinely 'standalone' new settlement.

19. The 'M42 Opportunity Area' is relatively isolated from established urban areas when compared against the other potential directions for growth, and correspondingly growth in this area is likely to have a much looser and less sustainable relationship with such areas in transport terms. To address this, it would likely need to be concentrated in a single location and be of sufficient total scale to form a genuine new settlement, able to sustain sufficient levels of onsite jobs and services/facilities to meet residents' needs.
20. Any new settlement in the 'M42 Opportunity Area' would also be likely to have a stronger relationship with the Birmingham/West Midlands Conurbation than any existing settlements within Leicestershire and thus transport links to and from the West Midlands would need to be carefully considered as part of any specific proposal in this area. In relation to this, there may be opportunities to align with/contribute towards Midlands Connect's aspirations to enhance the M42/A42 corridor albeit this is currently in the early stages of gestation.
21. The 'North East Connections to Leicester' direction for growth area is more consistent with the existing county-wide spatial distribution of growth, and in that respect significant growth in this area is likely to place additional pressure/emphasis on existing priority corridors and 'pinch points' on the transport network including the A50/A511 and A47 corridors. As suggested by the name, the form and function of strategic growth in this area is likely to be driven to a greater or lesser extent by its relationship and transport connectivity to Leicester (and the wider built framework of Leicester) and good public transport links into Leicester would thus be vital to make this work as a sustainable growth location.

Strategic Property Services Asset Management response

22. Leicestershire County Council owns lands on either side of Stoke Road, Hinckley, and to the north of the A47 Normandy Way. Both are included in the 2017/18 Strategic Housing and Economic Land Availability Assessment (SHELAA) as site references LPR47 and LPR48 extending to some 35.6 hectares in total. It is understood that other parties are promoting development opportunities on adjoining land extending eastwards towards the A447 Ashby Road, and also on land to the west of Stoke Road. The potential exists for these parties to work in collaboration to bring forward a sustainable urban extension in this location.
23. With the active involvement of willing development partners, this location represents a deliverable opportunity that should be given serious consideration as the Council develops its spatial strategy for the plan. As well as being well located in relation to the range of services and facilities in and around Hinckley, the location enjoys easy access to existing retail and employment facilities south of Normandy Way.

Q4 A new settlement could address some of the housing and employment growth needs in the borough. Should the authority explore options for a new settlement?

24. The challenges of delivering a new settlement should not be under-estimated. Local authorities in Leicestershire have struggled to deliver Sustainable Urban Extensions because of the scale and complexity of assembling land, securing developer agreement and resolving viability issues. These issues are likely to be even more complex for a new settlement and will be robustly scrutinised at Public Examination.
25. The location for new settlements should align with the growth areas identified within the agreed L&L SGP so that funding can be secured for infrastructure to deliver the Plan's aspirations.
26. It is worth noting that the new 'Sustainable Urban Extensions' throughout the County (some of which will provide up to 4,500-5,000 new homes e.g. New Lubbethorpe, North East of Leicester) are reliant on the immediately adjoining settlements for key services, facilities and job opportunities. This suggests that any completely new 'standalone' settlement would need to be considerably bigger than these to operate as a genuinely sustainable new community in transport terms (i.e. to initiate and sustain the necessary onsite jobs, services, facilities etc. accessible via walking, cycling and public transport) whilst also delivering the required levels of supporting transport infrastructure. With this in mind, is the level of additional growth that the Borough has to provide for through its new Local Plan likely to be of sufficient scale to facilitate the development of a completely new settlement?

Q5 No land has so far been identified which could have the potential to accommodate a new settlement. If you think a new settlement is a good idea do you have any suggestions for where a new settlement could be located within the borough?

27. For Hinckley and Bosworth Borough there are suitable and sustainable options for growth focused on the main urban area of Hinckley and in the more sustainable Key Rural Centres which represent the most appropriate approach to accommodating future development in the area.
28. The scale and location of any new settlement(s) will be critical to the extent to which they operate as genuinely 'standalone' new communities and by the same token their relationship with established settlements. This would in turn have implications for the supporting transport measures/infrastructure required, which could ultimately turn out to be more complex and expensive to deliver than extensions to established settlements.
29. Aligning with the Strategic Growth Plan and associated infrastructure proposals is likely to place a greater emphasis on areas towards the far south of the Borough; correspondingly growth opportunities which emerge in this area may need to be

considered and managed on a cross-boundary basis, including with regards to transport implications and requirements. This equally applies to any emerging growth proposals along the A5 corridor in terms of potential interactions with corresponding proposals across the County boundary in Warwickshire.

Q6 Do you have any other comments/suggestions for how the borough can meet its housing and employment growth needs up to 2036?

30. The key requirement for the new Local Plan is to ensure that growth is located to support and complement the aspirations set out in the SGP. If HBBC departs from this, for instance by proposing a new settlement outside of the A46 Priority Growth Corridor or the A5 Improvement Corridor, this will mean that sufficient growth will not be delivered in the priority areas to unlock funding for infrastructure.
31. The decision to progress with a non-statutory SGP was to enable a strategic policy steer to be provided to support new Local Plans and to demonstrate to government that there is collaboration and agreement amongst the Leicestershire authorities and the LLEP. HBBC is the first authority to consult on an emerging Plan following agreement of the SGP and it is crucial that the strategy is not undermined at the first opportunity.
32. The SGP is predicated on a clear set of strategic transport asks, the case for which would be diluted by promoting growth proposals which depart from this. Such proposals could potentially also introduce new strategic transport asks, increasing the overall infrastructure bill to the point where it is no longer realistically possible to fund and deliver in full. In particular this could have implications for the proposed improvements to the A5 and A46 expressway, that could provide substantial opportunity within the Borough.

Ecology observations

33. In terms of ecology, the detail is what matters, and the fact that decisions on development need to be informed by up-to-date comprehensive ecology surveys. As the proposals are quite broad, unable to make useful comments on them in terms of impact on ecology.
34. Some detail was provided in response to the SHELAA's last year, and an indication given as to where impacts are likely, or ecology surveys are needed. These comments are still valid, and will be for another two years or so. After that, it is advised to re-consult in case new evidence has come to light that could impact on a site. Once site allocations are finalised, ecologists would be happy to comment further.
35. In general terms, ecology impacts can more easily be mitigated for on larger development sites, as they can be part of the required open space framework. It can be difficult to achieve meaningful biodiversity gains on a series of smaller

sites.

As required by the NPPF, the Council's approach should be to achieve net gain for biodiversity as a result of development. To achieve this ecology needs to be considered at an early stage and Local Plans properly informed by ecology surveys.

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