

		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&L) sub-region/housing market area (and by extension, the implementation of the L&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"> • 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). • 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

		<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"> • 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. <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"> • The delivery of supporting transport infrastructure previously committed to through the 2009 Core Strategy. • 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). • In light of the preceding point, the specific transport infrastructure required to address these cumulative impacts. <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>
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			(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"> • 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. • 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’? <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: https://www.gov.uk/government/publications/transport-decarbonisation-plan</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: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf).</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.
15b	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"> • 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. • 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. • 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. <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>(NB: LHA comments in respect of the Plan's viability are provide in response to Q33.)</p>
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	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>		
21 b	<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⁽¹⁾, 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"> • 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). • 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 not significant...</i>” whereas the NPPF states: “...<i>or the residual cumulative impacts on the road network would be severe...</i>” • The lack of reference to the Government’s (cycling and walking) ‘Gear Change’ document and to its national bus strategy ‘Bus Back Better’ is surprising. It would be helpful to cross reference the LHA’s passenger transport policy and strategy and also to its new Cycling and Walking Strategy.
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			<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 every 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"> • 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. • As per the LHA’s comments on Policy HT01, the wording of HT04 is inconsistent with that used in the National Planning Policy Framework.
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>
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