

**Draft Local Plan Consultation  
Wednesday 30 June 2021 to Friday 27 August 2021**

# **Hinckley and Bosworth Local Plan 2020-2039**



**Hinckley & Bosworth  
Borough Council**

**Consultation Draft Plan  
Regulation 18  
June 2021**


## About this consultation

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This consultation is open for 8 weeks between

**Wednesday 30 June 2021 to Friday 27 August 2021**

The Council **prefers to receive your consultation responses on-line**, however, you may also respond by email or post using the details below.

 **Online (preferred):**

completing our online consultation at [www.hinckley-bosworth.gov.uk/localplanreview](http://www.hinckley-bosworth.gov.uk/localplanreview)

 **Email:** [planningpolicy@hinckley-bosworth.gov.uk](mailto:planningpolicy@hinckley-bosworth.gov.uk)

 **Post:**

Planning Policy  
Hinckley & Bosworth Borough Council  
Hinckley Hub  
Rugby Road  
Hinckley  
Leicestershire  
LE10 0FR

Consultation responses will be **made public** as part of subsequent stages of the Local Plan Review.

### Privacy statement

The personal data you have supplied to Hinckley & Bosworth Borough Council during this consultation period will be processed in accordance with Article 6(1)(e) of the General Data Protection Regulation and the Data Protection Act 2018. Article 9(2)(c) of the General Data Protection Regulation and the Data Protection Act 2018 also applies, as we will be collecting Special Category Data to help support our Local Plan consultation process. This data will not be shared with any third parties and will be anonymised. Together with your comments, it will be used as part of the statutory plan making process and will be available for public inspection. Signatures, email addresses and telephone numbers will be removed before disclosure as a matter of course. We cannot provide anonymity or accept comments marked 'private or confidential' and comments that include offensive, racist, discriminatory, threatening and other non-relevant statements will be destroyed. For more about how we use personal data, visit [www.hinckley-bosworth.gov.uk/privacy](http://www.hinckley-bosworth.gov.uk/privacy)

## Draft Local Plan – Consultation Response Form

### Your contact details

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| <b>Title</b>                           | Ms   |
| <b>First Name</b>                      | Sue  |
| <b>Surname</b>                         | Green  |
| <b>Organisation</b><br>(if applicable) | Home Builders Federation (HBF)                                     |
| <b>Representing</b><br>(if applicable) | HBF  |
| <b>Postal Address</b>                  | c/o 80 Needlers End Lane, Balsall Common,<br>Warwickshire, CV7 7AB |
| <b>Email Address</b>                   | sue.green@hbf.co.uk  |
| <b>Telephone Number</b>                | 07817 865534   |

### Draft Local Plan Consultation Questions

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| <b>Question 1:</b><br>I wish to make a general comment on the plan or a comment not related to the specific questions set out in the document. | No comment. |
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| <p><b>Question 2:</b></p> <p>Do you have any comments on the Spatial Portrait of the Borough?</p>   | <p>No comment.</p>  |
| <p><b>Question 3:</b></p> <p>Do you agree with the Plan Vision? If not, what changes do you suggest?</p>  | <p>No comment.</p>  |
| <p><b>Question 4:</b></p> <p>Do you agree with the Spatial objectives? If not, what changes do you suggest?</p>   | <p>No comment.</p>  |
| <p><b>Question 5:</b></p> <p>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?</p> | <p>The adopted Core Strategy settlement hierarchy will be retained. This establishes a 4-tiered settlement hierarchy comprising of the urban area (Hinckley, Burbage, Earl Shilton and Barwell), 10 Key Rural Centres, 7 rural villages and numerous rural hamlets. However, the adopted settlement hierarchy ignores the functional relationship between settlements (Ratby, Groby, Markfield &amp; Desford) and Leicester, which are located in close proximity to the urban area and housing growth greater than proposed in the Council's preferred strategy would be sustainable.</p> <p>The Council's preferred strategy for growth is a hybrid of five options outlined in previous consultations. The preferred hybrid strategy will direct most housing and economic growth to the urban areas (circa 70%) and the remainder (circa 30%) to the rural areas of the Borough. This broadly</p> |

reflects the existing distribution of the population across the Borough where about 62% of the population reside in the urban area, about 30% live in the Key Rural Centres and about 8% in the smaller rural villages and hamlets.

The Council consider that this preferred strategy is the most reasonable approach, which will direct growth to the most sustainable locations with proportionate growth in key rural settlements to maintain their vitality and viability. Presumptions for a minimum of 200 dwellings in each Key Rural Centre (Bagworth, Barlestone, Desford, Groby, Market Bosworth, Newbold Verdon, Ratby, Markfield, Stoke Golding & Thornton) and a minimum of 50 dwellings in each rural village (Congerstone, Higham-on-the-Hill, Nailstone, Sheepy Magna, Stanton under Bardon, Twycross & Witherley) are proposed. In rural hamlets, allocations are not proposed but limited growth may be permissible to meet specific identified needs, which will be managed by a policy led approach.

Between 2020 – 2039, the Council is proposing an overall HLS of 9,280 dwellings to meet its own minimum Local Housing Need (LHN) of 8,436 dwellings (444 dwellings per annum) plus 10% for flexibility and to accommodate some unmet need from Leicester.

As set out in the NPPG, the LHN is calculated at the start of the plan-making process, but this number should be kept under review and when appropriate revised until the LPR is submitted for examination (ID 2a-008-20190220). The minimum LHN for the Borough may change as inputs are variable.

The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. The NPPG explains that “*circumstances*” may exist to justify a figure higher than the minimum LHN (ID 2a-010-20201216). The NPPG also states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). The HBF believe that the Council should consider a housing requirement above the minimum LHN, which would support economic growth and deliver more

affordable housing.

Hinckley & Bosworth is part of the Leicester & Leicestershire Housing Market Area (L&LHMA). It is common knowledge that Leicester has an unmet housing need, which is to be redistributed across the HMA by agreement with neighbouring Councils. To date, there is no SoCG setting out how the housing needs of the L&LHMA will be met. To provide communities and other stakeholders with a transparent picture of collaboration, the NPPG sets out that authorities should have a SoCG available on their website by the time of publication of their Draft Plan. Once published, the Council will need to ensure that any SoCG continues to reflect the most up-to-date position of joint working (ID 61-020-20190315). The L&LHMA authorities should produce a SoCG setting out the quantum of unmet housing needs (based on the revised standard methodology including the Cities & Urban Centres 35% uplift) in Leicester and where unmet housing needs will be met by neighbouring authorities.

In the meantime, it is inappropriate to regard any headroom (the difference between the housing requirement of 8,436 dwellings and the proposed HLS of 9,280 dwellings) as a contribution by the Hinckley & Bosworth Borough Council towards meeting Leicester's unmet housing needs. This headroom (10% flexibility contingency) is required to ensure the resilience of the Local Plan in meeting the Borough's own housing needs. The Council is referred to the Harborough Local Plan Inspector's Final Report dated 8 April 2019 (para 35).

The Council's proposed overall Housing Land Supply (HLS) comprises :-

- 2,919 dwellings from existing commitments ;
- 1,168 dwellings (73 dwellings per annum) from windfalls ;
- 1,000 dwellings from Earl Shilton SUE ;
- 990 dwellings from Barwell SUE ; and
- new residential allocations for 1,596 dwellings in urban area and 1,607 dwellings in rural area.

The sufficiency of this HLS should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements. It is critical that an accurate assessment of availability,

suitability, deliverability, developability and viability of individual sites is undertaken. The Council's assumptions on lead in times and delivery rates should be correct and supported by parties responsible for the delivery of housing on each individual site.

The HBF always advocates as large a contingency as possible. There is no numerical formula to determine a quantum for flexibility but where HLS is highly dependent upon one or relatively few large strategic sites and / or localities as in Hinckley & Bosworth then greater numerical flexibility is necessary than where HLS is more diversified. On SUEs, there may be long lead in times before the commencement of on-site development and build up to optimum delivery rates. To ensure a continuous short to medium term HLS, SUEs should be complimented by smaller non-strategic sites.

Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. As set out in the 2021 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 69a).

The Council's windfall allowance of 73 dwellings per annum should be robustly evidenced. National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply.

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| <p><b>Question 6:</b></p> <p>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> | <p>The HBF agree that a new settlement would require significant forward planning by the Council. Early consideration will be necessary if a new settlement is to form part of a future spatial strategy for the Borough in future iterations of the Local Plan. As set out in the 2021 NPPF, where a new settlement forms part of the strategy, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery (para 22).</p>  |
| <p><b>Question 7:</b></p> <p>Do you agree with the approach to mitigating and adapting to climate change?</p>   | <p>The HBF recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The Council's policy approach to mitigating and adapting to climate change should accord with the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Government Response to The Future Homes Standard : 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provides an implementation roadmap, the Government's aim is for the interim Part L (Conservation of fuel and power), Part F (Ventilation) &amp; Overheating Regulations to be regulated for in late 2021 and to come into effect in 2022. The 2021 interim uplift will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. To ensure as many homes as possible are built in line with new energy efficiency standards, transitional arrangements will apply to individual homes rather than an entire development and the transitional period will be one year. This approach will support successful implementation of the 2021 interim uplift and the wider implementation timeline for the Future Homes Standard from 2025. The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes</p> |



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|   | <p>have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises. The Council should not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and the Future Homes Standard 2025.</p>  |
| <p><b>Question 8:</b></p> <p>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?</p> | <p>No comment.</p>   |
| <p><b>Question 9:</b></p> <p>Do you support the overall proposed strategy for high quality design in the borough? Are there any other issues the policy should address?</p>   | <p><b>Policy PMD01 - High Quality Design</b></p> <p>For <b>Bullet Point (e)</b> see HBF comments to Question 7 above and Question 31 below.</p> <p>Under <b>Bullet Point (m)</b>, residential development shall be provided with an appropriate level of private amenity space in accordance with the Good Design Guide Supplementary Planning Document (SPD) or its equivalent replacement.</p> <p>The policy wording reference to "<i>in accordance with the Good Design Guide SPD</i>" should not be interpreted by the Council's Development Management Officers as conveying the weight of a Development Plan Document (DPD) onto this SPD, which has not been subject to examination and does not form part of the Local Plan. The Town and Country Planning (Local Planning) (England) Regulations 2012 are clear that development management policies, which are intended to guide the determination of applications for planning permission should be set out in policy in the Local Plan. To ensure a policy is effective, it should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. The Council's requirements should be set out in sufficient detail to determine a planning application without relying on, other criteria or</p> |

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|   | <p>guidelines set out in a separate SPD. National policy clearly defines the scope and nature of an SPD in the planning process as providing more detailed advice and guidance on adopted Local Plan policies. The NPPG confirms that an SPD cannot introduce new planning policies nor add unnecessarily to the financial burdens on development (ID: 61-008-20190315).</p>   |
| <p><b>Question 10a:</b><br/>Should the Active Design and Travel Policy apply only to new residential development or should other development types be included?</p> | <p>No comment.</p>   |
| <p><b>Question 10b:</b><br/>Is the threshold of 10 or more residential dwellings appropriate?</p>   | <p>The proposed threshold of 10 or more residential dwellings in <b>Policy PMD02 - Active Design &amp; Travel</b> should be justified. The Council should not place unduly onerous requirements onto small sites and SME builders. It is important that there is a diverse range of companies operating within the house building industry. One of HBF's key messages is reversing the trend in the decline of small house building companies :-</p> <ul style="list-style-type: none"> <li>• today, there are 80% fewer SMEs in the industry in comparison to the early 1090s prior to the introduction of the plan led planning system ;</li> <li>• in 1988 small builders were responsible for 4 in 10 new build homes compared with only 10% today ;</li> <li>• in the period 2007-2009, one-third of small companies ceased building homes ;</li> <li>• returning to the number of house building companies operational in 2007 would boost housing supply by 25,000 homes per year ;</li> <li>• small sites are consistently efficient in their delivery of new homes across multiple market areas.</li> </ul> |

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| <p><b>Question 11:</b></p> <p>Should the housing mix policy apply to all residential developments or only to developments of 10 or more dwellings?</p> | <p>All households should have access to different types of dwellings to meet their housing needs. As well as evidence from the Council's 2019 Housing Needs Survey, market signals are important in determining the size and type of homes needed. The Council's policy approach should be flexible rather than overly prescriptive. This policy approach should also acknowledge that not all sites will be able to meet an overly prescribed housing mix requirement because of site size, proposed development typology, site specific circumstances and viability.</p> <p>To meet the needs of specifically identified groups of households, the Council should ensure allocation of appropriate sites rather than prescription of specific housing mixes for individual sites. The Local Plan should ensure that suitable sites are available for a wide range of different types of development across a wide choice of appropriate locations. The Council should consider allocating sites for older persons and other specialist housing subject to criteria such as the proximity of sites to public transport, local amenities, health services and town centres. The Council should also consider allocating sites for Self &amp; Custom Build housing (see HBF answer to Question 14 below).</p> |
| <p><b>Question 12:</b></p> <p>Do you agree that the nationally described space standards should apply to all new dwellings?</p>                        | <p>The HBF do not agree that Nationally Described Space Standards (NDSS) should apply to all dwellings as proposed in <b>Policy HO03 - Space Standards</b>.</p> <p>If the Council wishes to apply the optional NDSS to all dwellings, then this should only be done in accordance with the 2021 NPPF (para 130f &amp; Footnote 49). Footnote 49 states that "<i>policies may also make use of the NDSS where the need for an internal space standard can be justified</i>". As set out in the 2021 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that "<i>where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing</i>" (ID: 56-020-20150327). The Council should provide a local assessment evidencing its case.</p>  |

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|   | <p>The Council's policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.</p>  |
| <p><b>Question 13:</b><br/>How can the emerging national design code guidance on density be better incorporated into the policy on housing density?</p> | <p>Under <b>Policy HO04 - Housing Density</b>, the density of development will be guided by good design principles and the prevailing character of the area rather than specific density targets. However, unless justified through principles of good design, to ensure the efficient use of land the following minimum densities will be applied :-</p> <ul style="list-style-type: none"> <li>• At least 45 dwellings per hectare within and adjoining Hinckley, Burbage, Barwell and Earl Shilton ; and</li> <li>• At least 30 dwellings per hectare within and adjoining the Key Rural Centres, Rural Villages and Rural Hamlets</li> </ul> <p>The setting of residential density standards should be undertaken in accordance with the 2021 NPPF (para 125), whereby in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs then a minimum net density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. The proposed policy fallback position of a “two size fits all” approach to housing densities will result in development that is out of keeping with the character of the surrounding area and provide insufficient variety in house typologies to create balanced communities with the right types of new homes to meet the housing needs of different</p> |

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|  | <p>groups. A more nuanced policy approach to residential densities is required, which will respond to the specifics of different areas of the Borough.</p>  |
| <p><b>Question 14:</b><br/>Do you agree with the policy approach to Self and Custom build housing?</p> | <p>The HBF do not agree with the policy approach set out in <b>Policy HO06 - Self-build &amp; Custom Housing</b>, which proposes that sites providing 50 or more dwellings must include the provision of 5% of plots for self-build &amp; custom housing. All plots for self-build &amp; custom housing must be fully serviced.</p> <p>As set out in the NPPG, the Council should use its Self &amp; Custom Build Register and additional data from secondary sources to understand and consider future need for this type of housing (ID 57-011-20210208). As of May 2021, 84 expressions of interest have been registered. This evidence demonstrates that there is minimal demand for custom &amp; self build housing across the Borough. Moreover, a simple reference to the headline number of entries on the Register may over-estimate actual demand. The Register may indicate a level of expression of interest in self &amp; custom build but it cannot be reliably translated into actual demand should such plots be made available. The Register's entries may have insufficient financial resources to undertake a project, be registered in more than one local authority area and have specific preferences.</p> <p>There is no legislative or national policy basis for imposing an obligation on landowners or developers of sites of 50 or more dwellings to set aside 5% serviced plots for self &amp; custom build housing. Under the Self Build &amp; Custom Housebuilding Act 2015 and 2021 NPPF (para 62), it is the Council's responsibility, not the landowner or developer, to ensure that sufficient permissions are given to meet demand. The Council is not empowered to restrict the use of land to deliver self &amp; custom build housing. The NPPG sets out ways in which the Council should consider supporting self &amp; custom build by "<i>engaging</i>" with developers and landowners and "<i>encouraging</i>" them to consider self &amp; custom build "<i>where they are interested</i>" (ID 57-025-</p> |

201760728).

It is unlikely that self & custom build serviced plots on residential sites will appeal to those wishing to build their own home. The Council should ensure that the Local Plan will result in a wide range of different self & custom build housing opportunities. Numerous policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.

The proposed site threshold of 50 or more dwellings should be justified. The provision of self & custom build plots on sites of 50 or more dwellings adds to the complexity and logistics of developing these sites. It is difficult to co-ordinate the provision of self & custom build plots with the development of the wider site. Often there are multiple contractors and large machinery operating on-site, the development of single plots by individuals operating alongside this construction activity raises both practical and health & safety concerns. Any differential between the lead-in times / build out rates of self & custom build plots and the wider site may lead to construction work outside of specified working hours, building materials stored outside of designated compound areas and unfinished plots next to completed and occupied dwellings resulting in consumer dissatisfaction.

It is important that unsold plots are not left empty to the detriment of adjacent dwellings or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site.

As well as on-site practicalities impacts on viability should be tested. The provision of serviced self & custom build plots will have a bearing on the development economics of developments of 50 or more dwellings.

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| <p><b>Question 15a:</b></p> <p>Do you have any comments on the criteria based approach to Gypsy, Traveller and Travelling Showpeople accommodation set out in the policy?</p>  | <p>No comment.</p>   |
| <p><b>Question 15b:</b></p> <p>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 Development Plan Document?</p> | <p>No comment.</p>   |
| <p><b>Question 16a:</b></p> <p>Do you have any comments on the broad approach to securing affordable housing?</p>  | <p>The HBF will make more detailed comments on the Council's proposed affordable housing provision on sites of 10 or more dwellings of 20% (to be confirmed) in urban areas (Hinckley, Barwell, Earl Shilton and Burbage including SUEs) and 40% (to be confirmed) in rural areas after publication of the Council's Viability Assessment.</p> <p>In plan-making, viability is inseparable from the deliverability of development. At Examination, viability will be a key issue in determining the soundness of the Hinckley &amp; Bosworth Local Plan. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the 2021 NPPF, the contributions expected from development including the level &amp; types of affordable housing provision required and other infrastructure for education, health, transport, flood &amp; water management, open space, digital communication, etc. should be set out in the Local Plan (para 34). As stated in the 2021 NPPF, development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34). Viability assessment should not be conducted on the margins of viability especially in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. Without a robust approach to viability assessment, the Local Plan will be unsound, land will be withheld from the</p> |

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|  | <p>market and housing delivery targets will not be achieved.</p> <p>The Council's assessment of affordable housing need should align with 2021 NPPF definition of affordable housing need set out in Annex 2 : Glossary (ID 67-005-20190722). Furthermore, the Council's affordable housing tenure mix should accord with the 2021 NPPF expectation that at least 10% of homes will be available for affordable home ownership (para 65) and the 24 May 2021 Written Ministerial Statement requirement for 25% of affordable housing to be First Homes.</p> |
| <p><b>Question 16b:</b></p> <p>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?</p>  | <p>No comment.</p>  |
| <p><b>Question 17:</b></p> <p>How can the Local Plan best deliver the necessary employment land and premises required to meet its identified needs?</p>  | <p>No comment.</p>  |
| <p><b>Question 18:</b></p> <p>Should some key employment areas/premises that are of particular significance to Hinckley &amp; 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 &amp; B areas? What extra evidence would be needed to warrant</p> | <p>No comment.</p>  |



this special policy designation?

**Question 19:**

Do you have any comments on the planning for Strategic Distribution developments in Hinckley and Bosworth, and how local policy could be formulated?

No comment.

**Question 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?

No comment.

**Question 21a:**

Should policy define the expected extent of search for sequentially preferable sites? As a minimum, the 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.

No comment.

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| <p><b>Question 21b:</b></p> <p>Should permissions for E use in or edge of centre be conditioned to exclude light industry (the former B1c use)?</p>  | <p>No comment.</p> |
| <p><b>Question 21c:</b></p> <p>Where retail use is proposed in-centre, should it be conditioned to prevent Change of Use to other E class uses?</p>  | <p>No comment.</p> |
| <p><b>Question 21d:</b></p> <p>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?</p> | <p>No comment.</p> |
| <p><b>Question 22a:</b></p> <p>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)?</p>   | <p>No comment.</p> |

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| <p><b>Question 22b:</b></p> <p>Should the borough consider the use of an Article IV Direction to help protect any particularly valuable Town Centre uses?</p>  | <p>No comment.</p> |
| <p><b>Question 22c:</b></p> <p>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?</p> | <p>No comment.</p> |
| <p><b>Question 23:</b></p> <p>Could the measure of “over-proliferation” of facilities be improved and does the measure need to be individually tailored to suit centres in different levels of the centre hierarchy?</p>   | <p>No comment.</p> |
| <p><b>Question 24:</b></p> <p>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?</p>  | <p>No comment.</p> |

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| <p><b>Question 25:</b></p> <p>Do you have any comments on the approach to Heritage and Conservation?</p>   | <p>No comment.</p>  |
| <p><b>Question 26:</b></p> <p>Do you support the approach to green wedges set out in the policy?</p>   | <p>No comment.</p>  |
| <p><b>Question 27:</b></p> <p>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?</p> | <p><b>Policy NAT08 - Enhancing Biodiversity &amp; Habitat Connectivity</b> proposes that all development should provide a net gain in biodiversity where possible. Major developments in particular must include measures to deliver biodiversity gains.</p> <p>The site thresholds set out in <b>Policy NAT08</b> should accord with the Government's proposals as set out in the Environment Bill. Under the Environment Bill, the Government will introduce exemptions applicable to the most constrained types of development. Sites not containing habitats to start with (e.g. those entirely comprising buildings and sealed surfaces) will not be required to deliver compensatory habitats through biodiversity net gain, but may be required to incorporate some green infrastructure through wider planning policy. There will be a targeted exemption for brownfield sites that meet a number of criteria including that they (i) do not contain priority habitats and (ii) face genuine difficulties in delivering viable development, which will address concerns about the cost sensitivity of the redevelopment of post-industrial developed land. These exemptions will be set out in secondary legislation. The Government will also consider whether minor (less than 10 dwellings) residential developments should be subject to longer transition arrangements or a lower net gain requirement than other types of development. A simplified process for minor residential</p> |

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|   | <p>developments will be introduced to ensure that such schemes do not face additional new survey requirements. This simplified assessment will not include a condition assessment, so users will only need to state what habitats are present and the area that these habitats occupy to define their baseline for net gain.</p> <p>In the Environment Bill, the Government also makes provision for a transition period of two years for all sites. The Government will work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when. <b>Policy NAT08</b> should include reciprocal transitional arrangements.</p> <p>There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's Viability Assessment. The DEFRA Biodiversity Net Gain &amp; Local Nature Recovery Strategies : Impact Assessment Table 16 : Net gain delivery costs per greenfield development (residential) identified cost of £1,011 per dwelling in East Midlands (based on 2017 prices &amp; the Central Estimate) and Table 17 : Net gain delivery costs per brownfield development (residential) identified cost of £287 per dwelling in East Midlands (based on 2017 prices &amp; the Central Estimate). However, under Scenario C, there are significant cost increases for off-site delivery to £3,562 and £943 per dwelling respectively. There may also be an impact on the ratio of gross to net site acreage. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that biodiversity net gain does not prevent, delay or reduce housing delivery.</p> |
| <p><b>Question 28:</b><br/>Do you have any comments on the policy for development within the countryside?</p> | <p>No comment.</p>   |

|   |   |
|---|---|
| <p><b>Question 29:</b></p> <p>Do you agree with the approach to highways and transportation set out in policy HT01?</p>   | <p>Under <b>Policy HT01 - Highways &amp; Transportation</b>, all proposals for new development and changes of use should conform to the highway design standards that are set out in the most up to date guidance adopted by the relevant highways authority.</p> <p>The reference to conformity with highway design standards guidance should not be interpreted by the Council's Development Management Officers as conveying the weight of a Development Plan Document (DPD) onto this guidance, which has not been subject to examination and does not form part of the Local Plan. The Town and Country Planning (Local Planning) (England) Regulations 2012 are clear that development management policies, which are intended to guide the determination of applications for planning permission should be set out in policy in the Local Plan. To ensure a policy is effective, it should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. The Council's requirements should be set out in sufficient detail to determine a planning application without relying on, other criteria or guidelines.</p> |
| <p><b>Question 30:</b></p> <p>Are there any other locations or criteria you think would be acceptable to support the delivery of HGV parking facilities?</p>  | <p>Under <b>Policy HT02 - Parking Standards</b>, all proposals for new development will be required to provide an appropriate level of parking provision in conformity with the prevailing highways authority design guidance.</p> <p>See HBF answer to Question 29 above.</p>  |
| <p><b>Question 31:</b></p> <p>Should the policy set different electric vehicle charging infrastructure requirements for different types of non-residential uses, for example rapid charging points at commercial/retail developments or more charging points at long stay locations such as employment sites?</p> | <p><b>Policy HT03 – Electric Vehicle Charging Infrastructure Residential Development</b> requires proposals for new major residential development to provide the following electric vehicle charging infrastructure :-</p> <ul style="list-style-type: none"> <li>• One electric charging point for every new dwelling with parking provision within its curtilage ;</li> <li>• One charging point for every 10 parking spaces for residential development with unallocated communal off street parking, and passive charging provision to be provided for all remaining spaces.</li> </ul> <p>All active charge points and passive infrastructure</p>  |

for residential development should be or enable a minimum Mode 3 Standard AC charging outlet and shall meet the minimum standard technical specification published by the Office for Zero Emission Vehicles.

The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. As set out in the Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7<sup>th</sup> October 2019), the Government's preferred option is the introduction of a new requirement for Electric Vehicle Charging Points (EVCP) under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country and supersede the Council's policy approach.

Until the introduction of proposed changes to Part S of the Building Regulations, the HBF consider that the physical installation of active EVCPs is inappropriate. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A passive cable and duct approach means that the householder can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies.

The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard (see HBF answer to Question 7 above). These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery.

The Council's Viability Assessment should account for additional costs associated with the provision of

|   |  |
|---|--|
|   | EVCPs. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks, which under the Government's proposal automatically levies a capped figure of £3,600 on developers. |
| <p><b>Question 32:</b></p> <p>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?</p> | No comment.  |
| <p><b>Question 33:</b></p> <p>Should the policy be amended to reflect emerging Government proposals for infrastructure funding and planning gain set out in the Planning White Paper?</p>   | No comment.  |

## Equalities Information

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A. What is your age? [Please tick one box which applies]

|                   |  |
|-------------------|--|
| Under 16          |  |
| 16-25             |  |
| 26-35             |  |
| 36-45             |  |
| 46-55             |  |
| 56-65             |  |
| Over 65           |  |
| Prefer not to say |  |



B. Do you have a long term illness or disability?

|                   |  |
|-------------------|--|
| Yes               |  |
| No                |  |
| Prefer not to say |  |

C. If yes, please specify the type of impairment(s). [Please tick the boxes which applies]

|  |  |
|--|--|
| Physical or mobility impairment (including arthritis, cerebral palsy and using a wheelchair) |  |
| Sensory impairment (including hearing, sight and speech impairments)                         |  |
| Learning impairment (including dyslexia and autism)  |  |
| Mental health (including anxiety, bipolar disorder and depression)                           |  |
| Communication impairment (including speech impairment)                                       |  |
| Long term illness (including cancer, diabetes, HIV and multiple sclerosis)                   |  |
| Other Please specify .....   |  |
| Prefer not to say  |  |

D. How do you identify your gender? [Please tick one box which applies]

|                               |  |
|-------------------------------|--|
| Male                          |  |
| Female                        |  |
| Prefer to self-describe ..... |  |
| Prefer not to say             |  |

E. Do you identify as the same gender you were assumed to be at birth?

|                   |  |
|-------------------|--|
| Yes               |  |
| No                |  |
| Prefer not to say |  |

F. What is your ethnicity? [Please tick one box which applies]

|  |  |
|--|--|
| White – British / English / Northern Irish / Scottish or Welsh<br>White – Irish                          |  |
| White – Gypsy or Irish Traveller   |  |
| White – Any other White background<br>Please specify.....  |  |
| Asian/Asian British – Indian Asian/Asian British – Pakistani   |  |
| Asian/Asian British – Bangladeshi Asian/Asian British – Chinese  |  |
| Asian/Asian British - Any other Asian background<br>Please specify.....                                  |  |
| Black/African/Caribbean/Black British – African  |  |
| Black/African/Caribbean/Black British – Caribbean  |  |
| Black/African/Caribbean/Black British – Any other Black/African/Caribbean background Please specify..... |  |
| Mixed/Multiple ethnic groups – White and Black Caribbean   |  |
| Mixed/Multiple ethnic groups – White and Black African   |  |
| Mixed/Multiple ethnic groups – White and Asian   |  |
| Mixed/Multiple ethnic groups – Any other Mixed/Multiple ethnic background. Please specify.....           |  |
| Other ethnic group: Arab   |  |
| Other ethnic group: Any other ethnic group<br>Please specify.....  |  |
| Prefer not to say  |  |

G. What is your sexual orientation? [Please tick one box which applies]

|                               |  |
|-------------------------------|--|
| Heterosexual or straight      |  |
| Gay or lesbian                |  |
| Bisexual                      |  |
| Prefer to self-describe ..... |  |

|                   |  |
|-------------------|--|
| Prefer not to say |  |
| I don't know      |  |

H. What is your religion or belief? [Please tick one box which applies]

|                              |  |
|------------------------------|--|
| Christianity                 |  |
| Hinduism                     |  |
| Judaism                      |  |
| Islam                        |  |
| Buddhism                     |  |
| Sikhism                      |  |
| I have no religion or belief |  |
| Other - Please specify.....  |  |
| Prefer not to say            |  |

I. Are you married or in a civil partnership? [Please tick one box which applies].

|  |  |
|--|--|
| Married                                      |  |
| Civil Partnership                            |  |
| Prefer to self-describe.....                 |  |
| Single (Not married or in civil partnership) |  |
| Prefer not to say                            |  |

J. Have you been pregnant, on maternity leave or breastfeeding within the last six months? [Please tick one box which applies].

|                   |  |
|-------------------|--|
| Yes               |  |
| No                |  |
| Prefer not to say |  |

## About The Local Plan

K. Overall, has the Local Plan adequately considered principles of equality and inclusion?

|                   |  |
|-------------------|--|
| Strongly Agree    |  |
| Agree             |  |
| Neutral           |  |
| Disagree          |  |
| Strongly Disagree |  |

L. Overall, is the Local Plan compliant with the Public Sector Equality Duty?

|                   |  |
|-------------------|--|
| Strongly Agree    |  |
| Agree             |  |
| Neutral           |  |
| Disagree          |  |
| Strongly Disagree |  |

M. Overall, does the Local Plan reflect the make-up of the Hinckley & Bosworth community?

|                   |  |
|-------------------|--|
| Strongly Agree    |  |
| Agree             |  |
| Neutral           |  |
| Disagree          |  |
| Strongly Disagree |  |

N. Overall, have Hinckley & Bosworth Borough Council accommodated or allowed provision for reasonable person specific requests? (Such as accessibility requests relating to disability or language).

|                |  |
|----------------|--|
| Strongly Agree |  |
|----------------|--|

|                   |  |
|-------------------|--|
| Agree             |  |
| Neutral           |  |
| Disagree          |  |
| Strongly Disagree |  |

Thank you for your response to the equalities questions.