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Date: **20.07.2022**

Nuneaton and Bedworth Borough Council
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Dear sir or madam,

Nuneaton and Bedworth Borough Plan – Preferred Options Consultation

Thank you for your letter dated 10 June 2022, inviting Hinckley & Bosworth Borough Council (HBBC) to comment on the above document. HBBC note that the purpose of this consultation is to seek views on the Preferred Options version of the Borough's new Local Plan which will set out the spatial vision and strategic objectives for the development of the area along with a strategy and the policies to enable its delivery, including the provision of strategic site allocations over the period to 2039.

Strategic development strategy

HBBC notes that the Plan seeks to make provision over the plan period to 2039 for:

- 9,690 homes based on 646 dwellings per annum (to be reviewed when the HEDNA 2022 is published).
- 80.5ha of employment land for industrial and distribution/warehousing development (to be reviewed when the HEDNA 2022 is published).
- 2ha of employment land for office space.
- At least 6 permanent residential pitches to accommodate Gypsies and Travellers by 2025/26; and
- At least a further 5 permanent residential pitches beyond those required by 2025/26 so that, in total, at least 11 permanent residential pitches to accommodate Gypsies and Travellers by 2036/37.
- A further 5.6ha of land will be allocated as future cemetery land burial space (allocation CEM-1) and beyond.

Housing need

It is noted that Nuneaton and Bedworth Borough Council have decided to use an updated Housing and Economic Development Needs Assessment (HEDNA) to calculate its housing need instead of the standard method in order to provide a more-up-date assessment. The NPPF' paragraph 61's guidance on using an alternative approach to the standard method would need to qualify as an exceptional circumstance which reflects

current and future demographic trends and market signals. We understand that Icen's analysis considers recent population growth is higher than reflected in the 2014 based household projections and the concerns over the accuracy of the Office of National Statistics population estimates for Coventry. This will need to be fully justified as the plan progresses.

We approve the approach of allocating sites in the main spatial areas of Nuneaton, Bedworth, Bulkington and the northern Coventry fringe as their existing infrastructure can be utilised.

It is noted that The Infrastructure Delivery Plan will be updated to consider the infrastructure requirements to support all proposed allocations.

Cross boundary implications of development

The plan proposes a strategic housing allocation, Top Farm for 1700 dwellings, along the A5 which is in relatively close proximity to the boundary with Hinckley and Bosworth and the rural village of Higham on the Hill. Proposals for development, regardless of proximity to Hinckley and Bosworth Borough should be planned alongside necessary infrastructure requirements to minimise any impact on the services and infrastructure within Hinckley and Bosworth. The A5 is currently operating over capacity, and it is likely that a development of this scale would have an adverse impact on the highway network in this area, including HBBC.

HBBC is cognisant of potential impact on the A5 affecting pinch points at the Dodwells and Longshoot junctions of some of its own proposed site allocations in the emerging Local Plan as well as planned expansion of the Horiba MIRA site north and south of the A5 as well as potential impact arising from the expected NSIP Hinckley National Rail Freight Interchange proposal, which is expected to be submitted before the end of this year. All of these proposals must therefore be accounted for in any transport assessment relating to the Top Farm proposal to demonstrate that the A5 has capacity to cope with the cumulative additional traffic and that suitable highway improvements are provided for in the IDP should that not be the case.

Policy SHA-1 Top Farm refers to a transport modelling report to justify that it mitigates impacts to the A5. However, this is not cited nor does it form part of the consultation documentation. The most recent transport modelling report found on the Nuneaton and Bedworth website is a version dating back to 2016. It is unlikely that the findings of this modelling report are still valid especially given that the RIS2 scheme is no longer moving forward.

We note that an updated Strategic Transport Assessment has been commissioned to assess the potential impacts of the Borough Plan Review allocations and proposals on the highway network. We would welcome the opportunity to review this document in due course and wish to continue working with Officers of your Council, Warwickshire County Council and Leicestershire County Council to explore the most effective delivery mechanisms for cross-boundary strategic transport schemes required to accommodate the combined impact of growth in our respective Boroughs.

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HBBC would like to reserve further comment regarding the 'soundness' of the plan until the pre-submission consultation stage, when any remaining evidence base documents and the policies contained within the Plan have been fully drafted.

We look forward to continue working with Nuneaton and Bedworth Borough Council in the development of our respective local plans and on wider cross boundary planning issues

Kind regards,

Yoanna Gardner
Planning Officer – Policy
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Hinckley and Bosworth Borough Council