

Planning and Regeneration,
Hinckley and Bosworth Borough Council,
The Hinckley Hub,
Rugby Road,
Hinckley, LE10 0FR

27220/A5/DM/GW
14 March 2023

Dear Sir/Madam,

**FULL PLANNING APPLICATION FOR PROPOSED EXTENSION TO EXISTING WORKSHOP
MIRA TECHNOLOGY PARK, WATLING STREET, NUNEATON, CV10**

On behalf of HORIBA MIRA Ltd ('the Applicant'), we hereby submit a full planning application to Hinckley and Bosworth Borough Council ('HBBC' or 'the Council') for the proposed extension to the existing workshop at MIRA Technology Park, Watling Street, Nuneaton, CV10 ('the Application Site').

The Description of Development for the application is as follows:

"Extension to Existing Workshop"

In addition to this covering letter, the application comprises the following documents and drawings submitted electronically via Planning Portal (PP-11954364):

- Completed Application Form and Certificates;
- CIL Additional Form;
- Drawings prepared by MIRA Estates Management;
 - Site Location Plan (ref. 2023-01-FE-SK-02);
 - Proposed Site Plan (ref. 2023-01-FE-SK-01);
 - Proposed Ground Floor Plan (ref. 1228475 SK 01); and
 - Proposed Elevations (ref. 1228475 SK 02).
- Design and Access Statement, prepared by MIRA Estates Management;
- Ecological Walkover Survey, prepared by Middlemarch;
- Preliminary Bat Survey, prepared by Middlemarch; and
- Archaeology Report prepared by Headland.

The requisite fee of £6,500.20 (inc. service charge) has been paid via the Planning Portal.

Background

The Application Site is located within the Motor Industry Research Association ('MIRA') land holding known as the 'HORIBA-MIRA Works and Proving Ground'. The wider estate measures approximately

340ha and comprises the test track facilities and a range of associated employment and research and development ('R&D') floorspace.

Located on the southern portion of the wider MIRA site, the Application Site comprises grassland and hardstanding and is located adjacent to the existing single-storey crash test workshop facility (2,319sqm floorspace) which enables single moving object collisions under test conditions. The crash test facility is bounded by existing workshop buildings for the test facility.

MIRA is designated as an Employment Allocation (ref. HIG17) in the Development Plan and as an Enterprise Zone for Transport, designated by the Government in 2012 (and expanded in 2015). The Enterprise Zone seeks to support additional workspace for research and development and support the objective of MIRA to become the largest transport innovation hub in the UK and Europe. This provides the impetus for new employment generating development at the Site.

The Site lies within Flood Zone 1, benefits from a low risk of surface water flooding and is not located within a Groundwater Source Protection Zone. Therefore, the Site is at a low risk of flooding.

Proposed Development

Full planning permission is sought for the extension of the existing crash test workshop facility at the Technology Park. The proposed extension will be used for the performance testing of vehicles and enable two moving objects to collide under test conditions, compared to the existing capability to perform single moving object collisions, ensuring the laboratory meets new legislation for vehicle testing.

The existing building will be extended to the west and north, creating two single-storey extensions creating 1,008sqm of additional E(g)(ii) floorspace. The western extension will be approximately 75m long by 22m wide and form an acceleration lane, whilst the northern extension will be approximately 7m wide and 10m long and will provide amenity area, additional run off space and area for new plant equipment. Building heights will be 7m high to the ridge line with varying eaves heights with the differing widths of the extension. Roof lights will be installed to allow light.

The design of the extension is contemporary and will reflect the appearance of the surrounding buildings within MIRA (see Figure 1). It will be constructed of a steel portal frame with an external finish of Kingspan cladding finished in "goosewing grey", with anthracite grey doors and rainwater goods.



Figure 1: Example workshop building within the wider MIRA site

The existing welfare and office spaces within the laboratory will be maintained and no changes are proposed. Pedestrian access will be via the existing access doors within the existing building. Additional fire escape points will be installed to the proposed extension.

No additional car or cycle parking will be provided due to the adequate existing parking provision of 340 car parking spaces, including 6 disabled bays, and 30 cycle parking spaces within the existing lower MIRA site. Vehicular and cycle access to the proposed extension will be via the existing internal road network.

Vegetation clearance has taken place to accommodate the extension. Due to possible future expansion surrounding the Application Site, there is limited opportunity for landscape improvements, however the application for the permission for the wider Technology Park (ref. 14/00661/CONDIT) and other development initiatives on site will provide new landscaped areas, a linear park and biodiversity net gain. It is therefore considered that any negligible biodiversity loss at this location would be offset by the wider initiatives within the estate.

Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act 2004 require that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise.

The relevant Development Plan for HBBC comprises:

- Core Strategy DPD (December 2009); and
- Site Allocations and Development Management Policies DPD (July 2016).

The National Planning Policy Framework ('NPPF') (July 2021) and National Planning Policy Guidance ('NPPG') are also material considerations in assessing this planning application. The Government consulted upon reforms to the NPPF with consultation concluding on 2nd March 2023; an updated NPPF is expected in Spring 2023.

HBBC are currently undertaking a review of the Local Plan. The Regulation 19 Local Plan consultation concluded in March 2022. A further Regulation 19 consultation on the draft Local Plan is expected in spring 2024 following completion of evidence gathering, with adoption anticipated for August 2025. As the Local Plan Review is at an early stage, it is considered the draft policies have limited weight in the determination of planning applications.

Assessment of Proposed Development

Principle of Development

Sustainable development is at the heart of the NPPF. Paragraph 8 sets out the overarching objectives of the planning system, which includes "*an economic objective*" defined as establishing a "*strong, responsive competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity*". In addition, paragraph 11c states that development proposals that accord with an up-to-date development plan should be approved without delay.

NPPF paragraph 83 states that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Paragraph 85 requires decisions to recognise and address the specific locational requirements of different sectors, including making provision for clusters or networks of knowledge and data-driven, creative or high technology industries.

MIRA is an existing employment site, as allocated within the adopted Site Allocations and Development Management Policies DPD and emerging Local Plan Review. Policy DM19 of the Site Allocations and Development Management Policies DPD and Policies EP02 and EP03 of the emerging Local Plan Review supports development of employment uses within existing employment areas and established Enterprise Zones.

Policy EP05 of the emerging Local Plan Review supports high quality employment development related to business sectors associated within the established Enterprise Zone, including automotive research, development and innovation within the MIRA site.

MIRA is defined as a "Category A" Employment Site, which should be retained fully for employment uses, and as an Enterprise Zone, therefore the Site is considered suitable for continued and intensified employment use. The proposal is for an extension to the existing crash test workshop facility. The development will increase the Class E(g)(ii) floorspace by 1,008sqm to provide an acceleration lane to enable two-object collision testing to meet new legislation and further support automotive research. The development will enhance the test facility and support innovation and adaption of the wider MIRA site and cluster of businesses/occupiers in accordance with NPPF and the adopted and emerging Development Plan.

Design

Policy DM10 of the Site Allocations and Development Management Policies DPD and Policy PMD01 of the emerging Local Plan Review state that development will be permitted providing that design requirements are met, including not having a significant adverse effect on the privacy and amenity of nearby residents and occupiers, complementing or enhancing the character of the surrounding area and uses, building materials respect the materials of existing, adjoining/neighbouring buildings and the local area, and incorporate a high standard of landscaping where it would add to the quality of the design and siting.

The proposal is designed to replicate and complement the existing crash test facility and surrounding workshop buildings within MIRA Technology Park through use of similar contemporary design, materials and scale, and therefore building on the established character.

There are no nearby residents who will be affected by the proposed development. The Application Site is surrounded by other workshop and R&D buildings within MIRA Technology Park; therefore, it is considered that the proposed extension will not detrimentally affect the neighbouring uses/occupiers.

Whilst the application proposals do not include landscaping, it is not considered this detracts from the design of the development. The design and siting of the building integrates with the established industrial character of the wider MIRA Technology Park to the east, whilst the massing and scale is contained to reduce impact on the countryside to the west.

As such, it is considered that the development complies with the criteria of the adopted and emerging Development Plan.

Ecology, Biodiversity & Trees

Site Allocations and Development Management Policies DPD Policy DM6 and Policy NAT08 of the emerging Local Plan Review requires development proposals to demonstrate how they conserve and enhance features of nature conservation. On-site features should be retained, buffered and managed

favourably to maintain the ecological value and a 10% biodiversity net gain (onsite in the first instance or through off-site mitigation or off-setting where appropriate). The removal or damage of such features shall only be acceptable where it can be demonstrated the proposal will result in no net loss of biodiversity and where the integrity of local ecological networks can be secured.

Policy NAT03 of the emerging Local Plan Review requires existing trees to be retained unless sufficient evidence is provided to justify their removal. Where there is an unavoidable loss of trees, replacement trees will be required to be planted on site at the rate of three trees for every one lost.

A small amount of vegetation clearance has been undertaken to accommodate the proposed extension, in accordance with the recommendations included in Middlemarch's Ecological Site Walkover report in relation to bird nesting. The removed vegetation was identified as appropriate for removal due to the low quality, no presence of bat roosting and unsuitability for reptile refuge or hibernation.

A ditch corridor has been identified onsite; however, this is dry and therefore is not a potential breeding habitat for great crested newts. Two ponds are located within 250m of the Site and four ponds within 500m, which have been surveyed in 2021 finding populations of great crested newts. The ponds do not form part of the proposals and long-term impacts resulting from the proposed development are not deemed likely due to the small scale of the project and the appropriate low impact great crested newt license will be secured as required.

No presence of hedgehogs or badgers were recorded within the survey, however suitable mitigation measures will be included within the development in accordance with Middlemarch's recommendations.

It is considered that the small amount of existing vegetation proposed to be removed as part of the Proposed Development is low quality and there have been no other significant biodiversity habitats identified onsite, and therefore the proposals are deemed to have a negligible impact on biodiversity. Whilst no landscape proposals are included as part of the Proposed Development, to retain opportunity for future development, it is considered that any potential loss will be mitigated by the landscaping strategy being delivered as part of the Technology Park permission (ref. 14/00661/CONDIT) which includes the creation of a linear park. Therefore, it is considered that the development is in accordance with adopted and emerging Development Plan policies.

Archaeology

Policy DM13 of the Site Allocations and Development Management Policies DPD and Policy HE03 of the emerging Local Plan Review seeks to preserve the borough's archaeology. Where a proposal has the potential to impact a site of archaeological interest, applications should be accompanied by an appropriate desk-based assessment and, where applicable, the results of a field evaluation detailing the significance of any affected asset.

The Archaeology Report confirms there are no known archaeological remains within the Site and there is no direct evidence of presence of archaeological remain on site. There may be potential for archaeological remains on site given it has not been previously developed but given the large number of previous archaeological investigations in the wider MIRA site it is considered the risk associated with the presence of important remains is low and less important remains is medium. The development will be undertaken in accordance with mitigation actions included within the Archaeology Report.

Sustainability

Policy CC01 of the emerging Local Plan Review seeks to minimise carbon emissions, maximise carbon storage and mitigate and adapt to the impacts of climate change including relating to building design, siting and construction, incorporation of green infrastructure, managing flood risk and supporting active travel.

The form of the building is designed to relate to the proposed function as an extension to the existing crash test facility. The efficient use of land has been incorporated into the design, ensuring the required capacity for the crash test facility extension is accommodated.

The Site is located in Flood Zone 1 and is at a low risk of flooding, therefore it is considered the proposals will have a negligible impact on the flood risk to the Site and surrounding area.

No landscape proposals are included as part of the Proposed Development to enable opportunity for future development, but the development will sit within the wider landscape strategy being delivered as part of the Technology Park permission (ref. 14/00661/CONDIT).

Therefore, the Proposed Development is considered sustainable in accordance with Policy CC01 of the emerging Local Plan Review.

Flood Risk & Drainage

Policy DM7 of the Site Allocations and Development Management Policies DPD requires development to not create or exacerbate flooding.

Appropriate sustainable drainage systems (SuDS) should be incorporated into development design, where possible, in accordance with Policies CC02 and CC03 of the emerging Local Plan Review.

The Site is located in Flood Zone 1 and is at a low risk of surface water flooding. It is considered that the proposals will not create or exacerbate flooding in accordance with Policy DM7.

Given the minor scale of the development and its location within the wider MIRA Technology Park, it is considered that site-specific SuDS are not appropriate. Whilst not anticipated, any potential increase in surface water flooding will be encompassed by drainage and SuDS serving the wider MIRA Technology Park. Therefore, the development is considered acceptable in relation to Policies CC02 and CC03.

Transport and Parking

Policy DM18 of the Site Allocations and Development Management Policies DPD and Policy HT02 of the emerging Local Plan Review require proposals to provide an appropriate level of parking provision.

No car or cycle parking is proposed as part of this development. Sufficient car and cycle parking is provided within the existing car parking areas and bicycle shelters (a total of 340 car parking spaces, including 6 disabled bays, and 30 cycle spaces).

Pollution

Given its small-scale, the use of the proposed workshop and its siting within the wider MIRA Technology Park, it is not considered the development will increase noise, light or air pollution, in accordance with Policy DM7 of the Site Allocations and Development Management Policies DPD.

Summary and Conclusions

Full planning permission is sought for an extension to the existing crash test workshop facility at the HORIBA-MIRA site. The extension is sought to increase capacity from existing and enable two-object collision testing to meet new legislation.

The development is considered appropriate in this allocated employment site and Enterprise Zone and accords with national and local policies which seek to support economic growth and business innovation and adaption for industries including the automotive industry.

The proposal is considered to be acceptable in terms of design, drainage, archaeology, sustainability, pollution and transport matters. In addition, the proposals are considered to have a negligible impact on biodiversity, with any perceived impact mitigated through the wider developments on site.

Overall, it is deemed that the Proposed Development is in accordance with national guidance and policies included within the adopted and emerging Development Plan, and therefore should be approved without delay.

We look forward to receiving confirmation that the application has been successfully registered and validated. Should you require any further information, please do not hesitate to contact myself or my colleague Graeme Warriner.

Yours faithfully,

Daniella Marrocco

DANIELLA MARROCCO

Planning Associate