



Please ask for: Yoanna Gardner
Direct dial/ext:
Direct fax:
Email: planningpolicy@hinckley-bosworth.gov.uk
Your ref:
Our ref:
Date: **15.03.2024**

Mr C Elston,
Head of Planning & Infrastructure
North West Leicestershire District Council
PO Box 11051
Coalville
LE67 0FW

Dear Mr Elston,

Draft North West Leicestershire Local Plan 2020 – 2040 Regulation 18 Consultation

Thank you for your letter dated 02 February 2024, inviting Hinckley & Bosworth Borough Council (HBBC) to comment on the above document. HBBC notes that the purpose of this consultation is to seek views on the following documents:

- Proposed Policies for Consultation
- Proposed Housing and Employment Allocations for Consultation
- Proposed Limits to Development for Consultation

It is acknowledged that these documents were prepared prior to the revisions made to the National Planning Policy Framework (NPPF) on 20 December 2023. It is also noted that any references to the NPPF are to the previous version dated September 2023 and will be corrected at the next stage of the plan. Therefore, HBBC will not be making comments relating to the changes to the NPPF.

Strategic development strategy

HBBC notes that the Plan seeks to make provision over the plan period to 2040 for:

- 13,720 dwellings based on 686 dwellings each year as set out in the Statement of Common Ground for Leicester and Leicestershire Housing Market Area (June 2022).
- 59,590 sqm for office uses (defined as the former B1 (now part of Class E)) and 195,500 sqm for industrial and small warehousing (defined as Class B2 and Class B8) of less than 9,000 sqm.
- The requirement for land for strategic B8 (warehousing) of more than 9,000 sqm will have regard to the outcome from the Leicester & Leicestershire Apportionment of Strategic Distribution Floorspace study.
- 47 Gypsies and Travellers pitches and 26 Travelling Showpeople Plots.

Housing need and requirement: Draft Policy S1

It is noted that North West Leicestershire District Council (NWLDC) have used the standard method to calculate the minimum annual local housing need figure as a starting point and the Leicester and Leicestershire Housing and Economic Needs Assessment. On 6 September 2022, NWLDC agreed to sign the Statement of Common Ground for Leicester and Leicestershire Housing Market Area (June 2022), which makes provision for a housing requirement figure of 686 dwellings each year.

Objective 11, Draft Policies S2,TC1, IF1, IF2 and IF3

The approach of allocating most of the housing via a new settlement is noted. We would be pleased to provide further comment as and when more information relating to Isley Woodhouse and/or any other new settlement/sustainable urban extension were available. The principle of allocating development sites in/around the Principal Town and the Key Service Centres can also achieve economies of scale for infrastructure provision and delivery.

In summary, HBBC acknowledges that a housing requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. HBBC remains committed to effective and on-going joint working with NWLDC and other relevant bodies, especially as this is integral to the determination of where additional infrastructure is necessary over the respective plan periods.

Draft Policy En2 – River Mease Special Area of Conservation (Strategic Policy)

(1) The Council will work with Natural England, the Environment Agency, Severn Trent Water, other local authorities and the development industry to improve the water quality of the River Mease Special Area of Conservation.

(2) In order to achieve this, until such time as wastewater is pumped out of the River Mease catchment, new development within the catchment will be allowed where:

(a) There is sufficient headroom capacity available at the named/identified Wastewater Treatment Works to which flows from the development will go; and

(b) The proposed development is in accordance with the provisions of the Water Quality Management Plan including, where appropriate, the provision of infrastructure or water quality improvements proposed in the Developer Contributions Scheme in operation at the time.

(3) In circumstances where:

(a) there is no headroom capacity available at appropriate wastewater treatment works; or

(b) no capacity available within the Developer Contributions Scheme in operation at the time; or

(c) exceptionally, as part of the development, it is proposed to use a non-mains drainage solution for the disposal of foul water with the

agreement of the Environment Agency; development will only be allowed where it is demonstrated that the proposal, on its own and cumulatively with other built and permitted development, will not have an adverse impact, directly or indirectly, on the integrity of the River Mease Special Area of Conservation.

HBBC **supports** the abovementioned policy and welcomes any liaison to improve the water quality of the River Mease Special Area of Conservation.

HBBC notes the issue of further advice from Natural England with regards to the River Mease SAC issued on 28th February 2024:

[Using the nutrient neutrality calculators - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/using-the-nutrient-neutrality-calculators)
[River Mease SAC: nutrient neutrality calculator - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/river-mease-sac-nutrient-neutrality-calculator)

Cross boundary implications of development

Employment

J11 /M42 – A444

[Proposed Housing and Employment Allocations for Consultation](#) proposes that land to the north of J11 A/M42 is a suitable site (SHELAA site EMP82) if, in due course, an allocation in this location is justified. The site is approximately 28Ha and comprises a wedge -shaped parcel of agricultural land contained by the A42 to the east, the A444 to the west and by field boundaries to the north.

HBBC's concerns are related to the potential scale of additional trips generated onto the A444 and the potential reduction in amenity and/or air quality across the highway network(s). **We reserve the right to comment further once transport modelling is completed for this site.**

Housing

Ibstock

Land off Leicester Road, Ibstock (Ib18) – A447

[Proposed Housing and Employment Allocations for Consultation](#) proposes that the above-mentioned site for 450 dwellings would need a solution to ease traffic on the Melbourne Road and Ashby Road. NWLDC proposes to construct a link road through the site, connecting Leicester Road and Melbourne Road (A447) and are aware that this proposal still needs to be agreed with the local highways authority who normally seek to avoid the creation of new access points on to A roads.

HBBC's concerns are related to the potential scale of additional trips generated onto the A447 and the potential reduction in amenity and/or air quality across the network(s). **We wish to reserve the right to comment further once transport modelling is completed for this site.**

It is noted that Part 1 of the Infrastructure Delivery Plan (IDP) has been prepared, but as the Local Plan makes further progress, each of the allocations will be subject to a more detailed assessment in Part 2 of the IDP. We would welcome the opportunity to review this

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document in due course and wish to continue working with officers of your Council and Leicestershire County Council to explore the most effective delivery mechanisms for cross-boundary strategic transport schemes required to manage and mitigate the combined impacts of growth.

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 continuing working with North West Leicestershire District Council in the development of our respective local plans and on wider cross boundary planning issues.

Yours sincerely,

Christopher Brown MRTPI
Head of Planning

Development Services
Hinckley and Bosworth Borough Council