



Hinckley & Bosworth
Borough Council

Local Plan 2020-2039

Regulation 19

Consultation Report

Regulation 19

9 February to 23 March 2022

Statement of Consultation Responses

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1. Executive Summary

- 1.1. This Consultation Report outlines the Regulation 19 consultation process undertaken by Hinckley & Bosworth Borough Council for the Local Plan 2020-2039. The Local Plan sets out the strategic vision, development framework, and planning policies to guide growth and change across the borough over the plan period.
- 1.2. The Regulation 19 consultation, held from 9 February to 23 March 2022, invited formal representations on the soundness and legal compliance of the Pre-Submission Local Plan. It followed earlier engagement stages including Issues and Options (2018), New Directions for Growth (2019), Regulation 18 Draft Plan (2021), and Sustainability Appraisal consultation (2020-2021).
- 1.3. The consultation was promoted through multiple channels including the Council's website, social media, press releases, the Borough Bulletin, posters, and public events. A hybrid approach was adopted to ensure accessibility during the transition out of the COVID-19 pandemic. Stakeholders were engaged via virtual events, one-on-one sessions, and direct notifications.
- 1.4. A total of 469 responses were received during the consultation period, generating 1,564 individual representations. Key themes raised included:
 - Housing Strategy and Distribution: Concerns over the adequacy of the housing requirement, affordable housing shortfall, and reliance on Strategic Urban Extensions (SUEs) with historic delivery issues.
 - Infrastructure and Viability: Lack of published Infrastructure Delivery Plan and Viability Assessment raised questions about the deliverability of policies and site allocations.
 - Climate Change and Sustainability: Policies were criticised for vagueness, duplication with Building Regulations, and lack of measurable targets or viability testing.
 - Employment Land and Economic Growth: Calls for more flexible and locally responsive employment land allocations, especially in Groby, Earl Shilton, and Desford.
 - Legal and Procedural Concerns: Absence of a published Sustainability Appraisal and updated Habitat Regulations Assessment led to questions about legal compliance.
 - Design, Accessibility and Density: Objections to prescriptive standards and lack of local evidence for space and accessibility requirements.
 - Transport and Flood Risk: Concerns over cumulative highway impacts, outdated transport evidence, and vague drainage policies.
 - Natural Environment and Biodiversity: Support for green infrastructure and biodiversity net gain, but concerns about feasibility and clarity of implementation.
 - Neighbourhood Planning and Settlement Strategy: Requests for clearer housing requirements per parish and better integration of Neighbourhood Plans.

- 1.5. All representations have been considered, and revisions made where appropriate. This report provides transparency on the consultation process and demonstrates how stakeholder feedback has informed the evolution of the Local Plan prior to submission for independent examination.

2. Introduction

- 2.1. The Hinckley & Bosworth Local Plan sets out the vision and objectives for the future form, scale and quality of development in the borough up to 2039. The plan:
- Identifies land and areas for development for a broad range of uses;
 - Identifies areas that should be conserved or enhanced and where future development should be carefully managed;
 - Sets clear policies that guide decisions on planning applications; and
 - Indicates how the Plan will be delivered, including infrastructure, and how progress will be monitored.
- 2.2. The development plan is at the heart of the planning system with a requirement established in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. The Plan sets out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure, as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. It is essential that plans are in place and kept up to date.
- 2.3. The Local Plan will replace the following Development Plan Documents:
- Hinckley & Bosworth Core Strategy (December 2009); and
 - Site Allocations and Development Management Policies (July 2016).
- 2.4. The following Area Action Plans (AAP) will be saved to support the applications for the Barwell and Earl Shilton SUEs and the preparation of a new Hinckley Town Centre Masterplan.
- Hinckley Town Centre Area Action Plan (March 2011); and
 - Earl Shilton and Barwell Area Action Plan (September 2014).
- 2.5. The Regulation 19 consultation represents a formal stage in the preparation of the Hinckley & Bosworth Borough Council Local Plan 2020-2039. Its purpose is to invite representations on the soundness and legal compliance of the Pre-Submission Local Plan before it is submitted to the Secretary of State for independent examination. This stage provides stakeholders, including residents, statutory bodies, and developers, with the opportunity to comment on whether the plan meets national planning policy requirements and has been prepared in accordance with relevant legislation.
- 2.6. The consultation is carried out under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, which requires local planning authorities to publish the proposed submission version of the Local Plan and invite representations prior to submission. Regulation 19 ensures transparency and accountability in the plan-

making process, allowing interested parties to assess whether the plan is legally compliant, positively prepared, justified, effective, and consistent with national policy.

2.7. Prior to the Regulation 19 consultation, Hinckley & Bosworth Borough Council undertook several earlier engagement stages, including:

- **Scope, Issues and Options consultation (Jan-Feb 2018)**, which explored key themes and challenges facing the borough.
- **New Directions for Growth consultation (Jan 2019)**, which examined strategic growth options.
- **Draft Local Plan consultation under Regulation 18 (June-Aug 2021)**, which presented initial policy proposals and site allocations.
- **Sustainability Appraisal consultation (Nov 2020-Jan 2021)**, which assessed the environmental, social, and economic impacts of the plan.

2.8. These stages helped shape the content of the Pre-Submission Local Plan and ensured that the views of stakeholders were considered throughout its development.

3. Consultation Undertaken

3.1. As highlighted above, the preparation of the Hinckley & Bosworth Borough Council Local Plan has involved extensive public engagement over several years, which has led to the production of the Regulation 19 Consultation Draft.

Duty to Cooperate and Informal Consultation

3.2. The National Planning Policy Framework (NPPF) places a legal duty on local planning authorities and county councils in two-tier areas to cooperate with each other and with other prescribed bodies on strategic matters that cross administrative boundaries. This duty ensures that strategic planning issues, such as housing, infrastructure and environmental protection, are addressed collaboratively and effectively.

3.3. In line with this requirement, Hinckley & Bosworth Borough Council has engaged in ongoing and constructive informal consultation with its strategic partners. This includes neighbouring planning authorities across Leicestershire and Warwickshire, as well as other relevant stakeholders. The Council has worked jointly to identify and address cross-boundary planning matters, contributing to the development of shared strategies and evidence bases.

3.4. Key outcomes of this cooperation include:

- The development of the Leicester and Leicestershire Strategic Growth Plan, which sets out a long-term vision for sustainable development across the region.
- The joint preparation of evidence base documents, such as housing need assessments, infrastructure capacity studies, and strategic flood risk assessments.
- The establishment of Memorandums of Understanding (MoUs) to formalise shared commitments and planning principles.
- Collaborative work on Statements of Common Ground, which document the strategic matters being addressed and the progress made in resolving them.

- Cross-boundary working groups such as the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO) and the Leicestershire Task and Finish Group.
- 3.5. These ongoing working practices have been integral to shaping the Local Plan and will continue to underpin future plan-making activities. A **Duty to Cooperate Statement** was published alongside the Regulation 19 version of the Local Plan to provide transparency and evidence of this collaborative approach.
 - 3.6. In addition to external stakeholder working groups, the Planning Policy Team also undertook informal internal consultation across departments to ensure that the plan reflects a coordinated and integrated approach to spatial planning. This collaborative process helped shape policies that are practical, deliverable and aligned with the Council's wider strategic objectives.
 - 3.7. The Planning Policy team worked closely with Development Management officers to ensure that proposed policies and site allocations were informed by practical experience and local knowledge of planning applications, appeals, and development trends. This collaboration helped refine policy wording, assess deliverability, and ensure consistency between the Local Plan and day-to-day decision-making processes.
 - 3.8. Consultation with the Green Spaces team contributed to the development of policies relating to open space provision, biodiversity, and green infrastructure. Officers provided input on existing provision, future needs, and opportunities for enhancement, ensuring that the Local Plan supports the delivery of accessible, high-quality green spaces across the borough.
 - 3.9. Additional informal consultation was undertaken with colleagues in climate change, housing, economic development, environmental health, and infrastructure planning. These discussions helped ensure that the Local Plan supports carbon reduction and climate resilience, housing delivery, employment growth, health and wellbeing, and infrastructure coordination.
 - 3.10. The Local Plan Member Working Group also plays a vital role in supporting the development of the Local Plan. It is a non-decision-making cross-party forum established to keep elected members informed and engaged in planning policy matters, including the preparation of the Local Plan and related strategic documents. The group provides a platform for members to review and discuss draft evidence base documents, Local Plan policies, and Neighbourhood Development Plans at early stages, offering informal feedback to guide officers in shaping formal proposals.

Regulation 19 Consultation

- 3.11. The Local Plan Regulation 19 consultation was conducted between Wednesday, 9 February and Wednesday, 23 March 2022.
- 3.12. To maximise awareness and engagement, the consultation was promoted through a variety of channels:

Borough Council's Website

- 3.13. The Borough Council's website had a dedicated page which acted as the online central hub for all consultation materials and guidance during the Regulation 19 stage. It hosted

the full suite of documents and gave clear instructions on how to submit representations, including guidance notes to assist users in navigating the process.

Social media platforms

3.14. To broaden the reach of the Regulation 19 consultation and engage a wider audience, Hinckley & Bosworth Borough Council actively used its social media platforms, including Twitter, Instagram and Facebook, to share updates, reminders and key information throughout the consultation period. Posts included links to the consultation documents, event invitations and infographics summarising the Local Plan's objectives. These platforms enabled the Council to connect with residents in real time, respond to queries and encourage participation from groups who may not engage through traditional channels. The use of visual content and targeted messaging helped increase visibility and accessibility, particularly among younger demographics and digitally active communities.

3.15. 'Table 5: Main issues raised by topic

Topic Area	Main Issues Raised
Legal and Procedural Concerns	Accessibility Compliance: The draft Local Plan fails to meet the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018, with over 1,600 errors identified. Sustainability Appraisal (SA): The Plan was published without an up-to-date SA, breaching Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environmental Plans and Programmes Regulations 2004. Habitat Regulations Assessment (HRA): The HRA is outdated and has not been re-screened in light of new guidance, particularly regarding the River Mease SAC. Duty to Cooperate: The Plan lacks a published Duty to Cooperate Statement and relies on an outdated Statement of Common Ground (SoCG). A new SoCG is expected but not yet incorporated. The Plan lacks a Strategic Environmental Assessment, Sustainability Appraisal, and Habitats Regulation Assessment screening statement. Without these, the Plan cannot be legally compliant or sound. Concerns that these issues could render the plan legally non-compliant.

Gypsy and Traveller Provision	Cross-Boundary Coordination: Support for the commitment to a separate Gypsy and Traveller Site Allocation DPD, but emphasis placed on the need for timely and collaborative work across Leicestershire.
Strategic Growth and Cross-Boundary Needs	Leicester's Unmet Need: The Plan defers addressing Leicester City's unmet housing need to a future review (Policy SS03), which is seen as inadequate. Respondents call for immediate inclusion of an allowance in the current Plan.
Site Selection and Evidence Base	Heritage Assets: Concerns raised about the lack of site assessment information and the absence of a Site Selection Topic Paper. This undermines transparency and the ability to assess impacts on heritage assets. Sustainability Appraisal Consultation: The absence of a concurrent SA consultation makes it difficult to evaluate whether earlier concerns have been addressed.
Health and Wellbeing	NHS Support: The Leicester, Leicestershire and Rutland Clinical Commissioning Groups (LLR CCGs) support the Plan's vision and seek collaboration to improve population health outcomes. Key priorities include: Community cohesion and identity. Access to green space and recreational facilities. Design that promotes physical and mental wellbeing. Carbon reduction measures linked to health benefits.
Consultation Process	Insufficient Engagement: The Regulation 19 version is viewed as rushed, with inadequate consultation on key matters such as the settlement hierarchy, housing allocations, and strategic policies. These should have been addressed at Regulation 18 stage.
Housing Requirement and Neighbourhood Planning	Affordable Housing Need: The Plan's reliance on the Standard Method is challenged. Respondents argue that the significant shortfall in affordable housing delivery (271 dpa needed vs. ~21% historic delivery) justifies a substantial uplift in the housing requirement. Neighbourhood Plans: The Plan fails to provide a breakdown of housing requirements per parish, as required by paragraph 66 of

	the NPPF. This omission undermines the ability of Neighbourhood Plan groups to plan effectively. Desford Parish: The Plan incorrectly treats reserve sites in the Made Desford Neighbourhood Plan as commitments, despite their status and timing.
Employment Land & Economic Growth	The Borough Council supports addressing logistics needs through regional employment land studies and advises considering findings from Leicestershire and West Midlands studies. Wilson Bowden promotes land at West Hinckley for employment use. The Employment Land and Premises Study (ELPS) 2020 identifies the site as high priority. Criticism of the Local Plan for deferring strategic employment allocations. Support for development along the A5 corridor, aligning with the Strategic Growth Plan (SGP). Concerns that deferral will harm economic growth and investment.
Education provision	Generally less complex, but cross-district impacts could be significant. Example: new secondary school proposed at Stoney Stanton to reduce transport and environmental impact. Hinckley Academy redevelopment may reduce capacity. The draft plan lacks a clear strategy for delivering education needs arising from new housing. There is no detail on housing trajectories, land for schools, or funding mechanisms, particularly where multiple developers must contribute.
Biodiversity Net Gain	The Environment Act (2021) mandates 10% biodiversity net gain as a condition for planning permission. Policy NAT08 requires on-site biodiversity net gain first, then off-site or offsetting. This could reduce developable land and affect housing delivery. No local mechanism exists for biodiversity credits or financial contributions, creating risks of delays and uncertainty.

	Current housing density methodology does not account for land needed for biodiversity net gain, likely reducing site capacity and housing numbers. Concerns raised that the Local Plan may not be positively prepared or supported by proportionate evidence to achieve its development strategy.
Blue-Green Infrastructure & Biodiversity	Support for blue-green infrastructure and biodiversity enhancement. Severn Trent's "Great Big Nature Boost" campaign aims to: • Revive 12,000 acres of land. • Plant 1.3 million trees. • Restore 2,000 km of rivers by 2027. Proposed policies: • Blue and Green Infrastructure Policy: Development should enhance blue-green corridors and protect watercourses. • Green Open Spaces Policy: Flood resilience schemes in green spaces supported if they don't harm the space's primary function. Emphasis on Sustainable Drainage Systems (SuDS) and alignment with NPPF paragraph 170.
Strategic Planning & Cross-Boundary Cooperation	Concerns from Leicestershire County Council about HBBC's approach, lack of detail, and unrealistic timetable. Issues with the effectiveness of joint working and the soundness of the Local Plan. Reference to the Leicester & Leicestershire Housing Market Area (HMA) and Functional Economic Market Area (FEMA). Need for HBBC to identify land to meet Leicester City's unmet housing and employment needs. Criticism of Policy SS03 (Local Plan Review) for delaying action on unmet needs.

Infrastructure & Transport	Support for Policy HT01 (Highways and Transportation) and HT04 (A5 Improvement Corridor). Strategic Business Case and Road Safety Audit submitted for A5 access. Emphasis on sustainable transport and safeguarding land for future infrastructure.
Housing Strategy & Delivery	Concerns about over-reliance on Barwell and Earl Shilton SUEs (Strategic Urban Extensions). Delays in planning applications and infrastructure issues raise doubts about deliverability. Suggestion to redistribute housing to sustainable rural areas. Calls for increased housing numbers to meet affordable housing needs and support economic growth. Criticism of the plan for not addressing Leicester's unmet housing need.
Waste management and utilities	Severn Trent encourages early engagement from developers. Recommendations for policies on: • Drainage hierarchy. • Sustainable Drainage Systems (SuDS). • Water resource protection. • Water efficiency (110 litres/person/day target). Emphasis on avoiding surface water discharge into foul sewers.

Table 6: Main Issues raised on supplementary documents and additional plans

Document	Main Issues Raised
Sustainability Appraisal	• Explicit NPPF and NPPG Requirements Ignored: National Planning Policy Framework and Planning Practice Guidance clearly require Sustainability Appraisal (SA) to inform plan preparation and site selection, and for the SA report (including non-technical summary) to be published alongside the draft plan for at least six weeks. This has not occurred.

	• The Submission Local Plan was published without a supporting Sustainability Appraisal (SA), breaching Section 19(5) of the Planning and Compulsory Purchase Act 2004 and Regulations 17 and 19 of the Local Planning Regulations 2012. The latest SA is from September 2020 and does not cover the Submission version. • Failure to Consult Statutory Bodies: NPPG guidance states that consultation bodies and affected parties must be consulted during the SA process. The absence of an SA means these legal obligations have not been met. • Missed Opportunity for Evidence-Based Site Selection: Without SA, the Council cannot demonstrate that site allocations were chosen based on sustainability criteria or that reasonable alternatives were assessed. This undermines transparency and accountability. • Outdated Evidence Base: The most recent SA work available is dated September 2020, which predates key policy changes and site allocations. This is insufficient for the Submission version. • No SA consultation occurred, and the Regulation 19 webpage did not list an SA report. This omission means the plan cannot demonstrate assessment of reasonable alternatives or compliance with legal requirements. • Cannot Be Rectified at Examination: Legal compliance issues relating to SA and SEA cannot be fixed during the examination stage. The plan must be re-consulted with an up-to-date SA before submission. • Risk of Legal Challenge: Failure to publish and consult on SA and HRA exposes the Council to potential legal challenge and jeopardizes the soundness of the Local Plan.
Strategic Environmental Assessment	• No SEA or Environmental Report was published with the Regulation 19 Local Plan, contrary to the Environmental Assessment of Plans and Programmes Regulations 2004.

	The plan does not show assessment of significant effects, reasonable alternatives, or reasons for site selection/rejection. No updated appraisal of policies or site allocations has been consulted on since 2018. This omission requires a compliant SEA and re-consultation before submission.
Preliminary Site Selection Paper	• Concerns raised about the robustness and transparency of the site selection process. • The Preliminary Site Selection Paper (Feb 2022) is high-level and lacks detailed assessments, including consideration of heritage assets and sustainability credentials. No Site Selection Topic Paper or Sustainability Appraisal has been published to justify allocations or demonstrate comparison with reasonable alternatives. Deliverability issues identified for key allocations (Barwell, Earl Shilton, Market Bosworth) and reliance on these sites questioned. • Evidence base is not proportionate, and without further assessment, the process is considered flawed. • Calls for additional sustainable and deliverable sites to be assessed and allocated to ensure housing requirements are met. • Lack of detailed site assessment and absence of a Site Selection Topic Paper or Sustainability Appraisal undermines confidence in the robustness of the process.
Rural Housing Numbers Methodology Statement	• Concerns over inconsistencies in settlement boundaries and lack of transparency in the methodology for rural housing numbers. • Respondents argue that Twycross, Witherley, Markfield, and Ratby should receive higher allocations due to sustainability, infrastructure capacity, and connectivity to higher-order settlements.

	• Evidence suggests Witherley could be considered a Key Rural Centre or accommodate more growth to support local services and address affordable housing need. • The Rural Housing Numbers Methodology Statement does not clearly explain how evidence and settlement characteristics informed minimum dwelling figures, which appear arbitrary and disconnected from overall housing targets. • Calls for a review of methodology and increased allocations in sustainable settlements to meet housing and affordable housing needs.
Settlement Hierarchy Paper December 2021	• General support for the settlement hierarchy approach, but significant concerns about methodology, transparency, and resulting allocations. • Figures for housing distribution appear arbitrary and disconnected from overall targets, with insufficient consideration of sustainability factors such as connectivity, employment opportunities, and infrastructure capacity. • Nailstone: Classified as a Rural Hamlet despite proximity to major employment site (Nailstone Colliery) and local facilities, which respondents argue justifies Rural Village status. • Desford, Markfield, Ratby: Highly sustainable locations with strong transport links and substantial affordable housing need, yet limited growth proposed. • Burbage: Lack of justification for discounting alternative sites (e.g., Lychgate Lane). • Concerns also raised about reliance on large sites like Hinckley West given historic delivery delays, risking five-year land supply. Borough-wide affordable housing need (271 homes per annum) far exceeds historic delivery, yet the plan does not propose increasing housing numbers or targeting growth in Key Rural Centres where higher affordable housing percentages could be achieved. Calls

	for reclassification of settlements, additional allocations in sustainable locations, and clearer evidence demonstrating how site choices were informed by Sustainability Appraisal and reasonable alternatives.
Settlement Inset Maps	• Requests clarification on the planning status of allocated sites in Burbage near Sapcote Road and whether boundary adjustments (e.g., BUR01H southern boundary) can be made to follow existing hedgerow lines. • Concern raised about the Market Bosworth site (Sedgemere 21/00379/FUL) intersecting a National Grid gas transmission pipeline (Blaby to Alrewas route), highlighting potential safety and deliverability issues. • Support expressed for development in urban areas and the settlement hierarchy, but strong objections to proposed housing in Thornton (e.g., Site AS33). Key concerns include severe highway congestion, road safety risks, inadequate parking, and existing issues with illegal parking linked to reservoir visitors. • Additional objections relate to insufficient village amenities, school capacity, and loss of countryside and natural habitat, including impacts on public footpaths and the National Forest. Respondents argue the site does not provide an acceptable extension to the village and would significantly harm its character.
Conservation Area Appraisal	• Request for Hinckley and Bosworth Borough Council to review its conservation area designations due to the age of the current appraisal and deterioration of character. Suggestion to assess whether the site should remain within the conservation area and concern that Hansom Court is detrimental to the existing conservation area.
Neighbourhood Plans	Desford NDP • Concerns that Policy SS02 and Table 5 incorrectly count two Desford Neighbourhood Plan reserve sites, including land north of Kirkby Road (Ashfield Farm), as

	commitments despite no planning permission. Borough-wide and Desford inset maps label these sites as “residential” and “NDP reserve allocation,” creating confusion. Respondents request that these sites be properly allocated in Policy HO01 or removed from commitment figures to ensure accuracy and soundness. Market Bosworth NDP • Strong objection to the proposed allocation of 243 additional homes in Market Bosworth. Respondents highlight that the Neighbourhood Plan (MBNP) has been actively monitored and updated, with community-supported projects and engagement undertaken in collaboration with HBBC. Concerns that the Local Plan disregards this work and previous assurances that allocations would be proportionate and aligned with Neighbourhood Plan objectives. The approach is seen as undermining community trust and the Neighbourhood Planning process, raising questions about soundness and justification. Markfield NDP • Concerns that the Markfield Neighbourhood Plan housing figure (334 dwellings) is not aligned with the Borough’s spatial strategy or evidence on sustainability and capacity. Respondents argue the approach fails to consider Markfield’s role as a Key Rural Centre, its connectivity, and ability to contribute to unmet housing and affordable housing needs. Calls for a more strategic distribution of growth and additional allocations in Markfield to reflect its size, services, and potential to deliver affordable housing.
Habitat Regulation Assessment	• No evidence that the Submission Plan has been re-screened under Habitats Regulations despite earlier advice that significant effects could occur. This omission risks non-compliance with the Conservation of Habitats and Species Regulations.

- A Shadow Habitat Regulations Assessment Screening Report was published in draft form in September 2020 under the Conservation of Habitats and Species Regulations 2017.
- If significant effects cannot be ruled out, a detailed Appropriate Assessment must be undertaken.
- The 2020 screening concluded that spatial strategy options and policy issues could have likely significant effects, requiring further assessment when the draft Local Plan is available.
- The submission Local Plan has not been re-screened, which is a major compliance issue.
- Natural England issued advice on 16 March 2022 regarding nutrient impacts on habitats, including the River Mease SAC within Hinckley and Bosworth.
- Local authorities must undertake an Appropriate Assessment with mitigation measures for nutrient impacts, this has not been done.

3.16. ' includes examples of social media posts which were used during the consultation.

Press Release

3.17. A press release was issued on 10 February 2022 to formally announce the launch of the Regulation 19 consultation for the Hinckley & Bosworth Borough Council Local Plan 2020-2039. The release outlined the purpose of the consultation, emphasising the importance of public input on the soundness and legal compliance of the draft plan. It provided clear instructions on how residents, stakeholders, and organisations could access the consultation documents, submit representations, and attend scheduled events. The press release was distributed to local media outlets, helping to raise awareness and encourage broad participation across the borough.

The Borough Bulletin

3.18. An article was published in the quarterly Borough Bulletin to notify residents of the borough of the Regulation 19 consultation and invite representations. The Spring 2022 Borough Bulletin was delivered to every household in the borough and a copy of the article can be viewed in Appendix A.

Poster Notification

3.19. Posters were distributed to parish councils across the borough to encourage local participation. A poster was also displayed in reception at the Council Office at the

Hinckley Hub, Rugby Road during the consultation period. A copy of the poster can be viewed in Appendix A.

Events

- 3.20. A series of events were organised to provide opportunities for direct engagement. The Borough Council was particularly mindful of the transition out of the coronavirus pandemic. Recognising the need to balance public health considerations with meaningful consultation, the Council adopted a hybrid approach combining in-person and virtual formats to ensure accessibility and safety.
- 3.21. Officers attended the Rural Conference hosted at Twycross Zoo on Thursday, 3rd March 2022. All rural parishes received an invitation to attend. The Planning Policy Manager provided a short presentation giving an update on the plan, and the Borough Council had a stall at lunchtime for attendees who had further questions or wished to speak to an officer.
- 3.22. The Planning Policy Team also hosted two virtual events hosted on Microsoft Teams, details of which are below:
- Date: 17 February 2022, time: 1.30pm to 3pm
 - Date: 22 February 2022, time: 6pm to 7.30pm
- 3.23. If people were not able to attend one of the above dates, could not access Microsoft Teams, or preferred an individual one-to-one discussion with an officer, slots were made available on request.

Document Availability

- 3.24. To ensure accessibility, consultation documents were made available in multiple formats. Copies of the Local Plan Regulation 19 version were made available on the Council's website www.hinckley-bosworth.gov.uk and hard copies were deposited at Hinckley Hub, Desford Library, Earl Shilton Library, Market Bosworth Library and Markfield Library.
- 3.25. Printed copies were also sent directly to individuals upon request, ensuring that those without internet access could still participate.

Direct Notification

- 3.26. Consultation letters, notifying recipients of the scope and dates of the consultation, explaining how to make a representation, and confirming the deadline for receipt, were sent directly to stakeholders and members of the public registered on the Local Plan consultation database, including those previously consulted on earlier versions of the Local Plan.
- 3.27. Where a record of an email address existed on the database, the consultation notification letter was sent by that method unless otherwise stated.
- 3.28. A copy of the consultation notification letter can be viewed in Appendix A.

4. Responses to Representations

- 3.29. The Local Plan Regulation 19 consultation received 469 responses within the consultation period. A further 19 consultation responses were received late, outside the

consultation period. Representations received during the formal consultation period equated to 1,564 individual representations on specific elements of the Plan.

- 3.30. The public consultation on the Local Plan Regulation 19 document was carried out having regard to the provisions of the Hinckley and Bosworth Statement of Community Involvement (2019), which was in effect at the time but has since been superseded (June 2024).
- 3.31. However, the consultation took place as the country was emerging from the coronavirus pandemic. During this period, consideration was still being given to the *Supplementary Guidance to the Statement of Community Involvement in Response to the Coronavirus Pandemic* (published 22 May 2020). Although national restrictions were easing, the guidance remained relevant in shaping engagement approaches and provided flexibility in consultation methods to reflect public health restrictions and evolving circumstances. The guidance was used to help shape engagement methods as the Council transitioned back to more traditional forms of public consultation.
- 3.32. All representations received on the Local Plan have been considered and amendments and revisions made where considered appropriate.

Summary of responses

- 3.33. Comments were received across a wide range of policy areas, site allocations and supporting documents. A summary of the main points identified through the consultation responses is available to view in Table 1 below. A more detailed summary is contained within Appendix B. A complete record of representations and the Council's response is available to view in Appendix C.

Table 1: Summary of main issues raised

Topic Area	Summary of main issues raised
Housing Strategy and Distribution	• Insufficient Housing Requirement: Proposed figure of 9,124 dwellings considered too low. • Affordable Housing Shortfall: Plan does not meet the need for 271 affordable homes per year. • Strategic Urban Extensions (SUEs): Barwell and Earl Shilton SUEs seen as unreliable due to historic delays. • Windfall and Small Sites: Concerns over robustness and NPPF compliance. • Policies HO03 (Space Standards) and HO05 (Accessible Housing) were challenged for lacking viability testing and local justification. • Policy HO09 (Affordable Housing) was criticised for not meeting identified needs and lacking supporting viability evidence. Settlement-Specific Objections: • Market Bosworth: Opposition to 243 dwellings due to infrastructure and character concerns. • Groby: Under-allocation despite sustainability credentials. • Desford: Reserve sites now committed; need for clearer policy alignment. • Thornton: Flood risk and infrastructure concerns due to reservoir proximity.
Infrastructure and Viability	• Infrastructure Delivery Plan (IDP): Phase 2 awaited; concerns over transport and education. • Viability Assessment: Not published; questions over financial deliverability of policies. • Education and Healthcare: Capacity concerns raised by Leicestershire County Council and NHS. • Water and Drainage: Severn Trent flags high-risk sites; recommends early engagement.
Climate Change and Sustainability	• Policy Vagueness: Climate policies lack measurable targets and duplicate other policies. • Passivhaus/Home Quality Mark: Exceeds national standards without local justification.

	• Biodiversity Net Gain: 10% target supported; concerns over delivery and off-site provision. • Tree Canopy and Native Species: 20% canopy cover and native-only planting requirements challenged. • Policy CC01 was criticised for lacking clarity, enforceability, and measurable assessment criteria. Terms such as “active design” and “circular economy principles” were seen as vague. • Several representations questioned the viability of carbon costing and the absence of a Viability Appraisal. • Concerns were raised about duplication with Building Regulations and the lack of alignment between spatial strategy and climate goals. • Policies CC02 and CC03 were viewed as vague and inconsistent with national policy. Calls were made to rely on national guidance rather than local policies. • Policy CC04 was seen as overly focused on wind energy, despite local support for solar and ground source energy. Concerns were raised about turbine viability and recycling. • Policy CC05 received mixed feedback. While support was given for high standards (e.g. Passivhaus, HQM), objections cited lack of local evidence, technical complexity, and duplication with Building Regulations. • Viability concerns were raised regarding exceeding national standards.
Employment Land and Economic Growth	• Employment Land Supply: Discrepancies between need and deliverable supply; calls for more small sites. • Strategic Sites: Support for MIRA Enterprise Zone; proposals for new sites like Soar Brook. • Policy EP06: Criticized for onerous developer requirements via S106. • Policy EP01 was criticised for failing to allocate sufficient land for local employment needs and relying heavily on the MIRA site. • Concerns were raised about the lack of flexibility, deliverability, and alignment with the Employment Land & Premises Study. • Calls were made to allocate additional sites in Groby, Earl Shilton, and Desford.

Legal and Procedural Concerns	• Sustainability Appraisal (SA): Not published with consultation; considered legally non-compliant. • Habitat Regulations Assessment (HRA): Outdated and not re-screened per updated guidance. • Duty to Cooperate: Initial lack of agreement on Leicester's unmet need; deferred resolution. • Soundness and Legal Compliance: Plan criticized for not being positively prepared or justified.
Design, Accessibility and Density	• Nationally Described Space Standards (NDSS): Applied without viability evidence; calls for flexibility. • Accessible Housing (M4(2)/(3)): Cost concerns and lack of local justification. • Self-Build Housing: 5% requirement questioned due to low demand. • Density Policies: Minimum densities seen as rigid and conflicting with design-led approaches. • Design Policies (PMD01 to PMD08): Overly prescriptive and misaligned with NPPF.
Water Management and Flood Risk	• Support was given for natural flood management techniques and the Drainage Hierarchy. • Clarification was requested on terminology such as "large scale developments." • Support was expressed for water efficiency targets and SuDS, particularly by Severn Trent Water.
Transport	• Multiple policies (HT01, HT04, INF01) were deemed unsound due to the absence of a Strategic Transport Assessment and Infrastructure Delivery Plan. • Concerns about cumulative highway impacts, lack of mitigation strategies, and outdated evidence were raised. • EV charging infrastructure policy (HT03) was seen as duplicative of Building Regulations and lacking viability testing.
Natural Environment	• Policies on biodiversity, green infrastructure, and tree planting (NAT01 to NAT08) were generally supported but raised concerns about feasibility, clarity, and alignment with national legislation (e.g. Environment Act 2021).

	• Objections were made to rigid canopy cover targets and native species requirements.
Neighbourhood Plan and Settlement Strategy	• Concerns were raised about the treatment of Neighbourhood Plan allocations, particularly in Desford and Market Bosworth. • Calls were made for clearer housing requirements per parish and better integration of Neighbourhood Plans. • Objections to settlement boundaries and classification (e.g. Nailstone as a Rural Hamlet) were also noted.

Appendix A: Copies of consultation materials

Figure 1: An example of one of the Facebook Social Media Posts during the consultation



Figure 2: An example of one of the LinkedIn Social Media Posts during the consultation

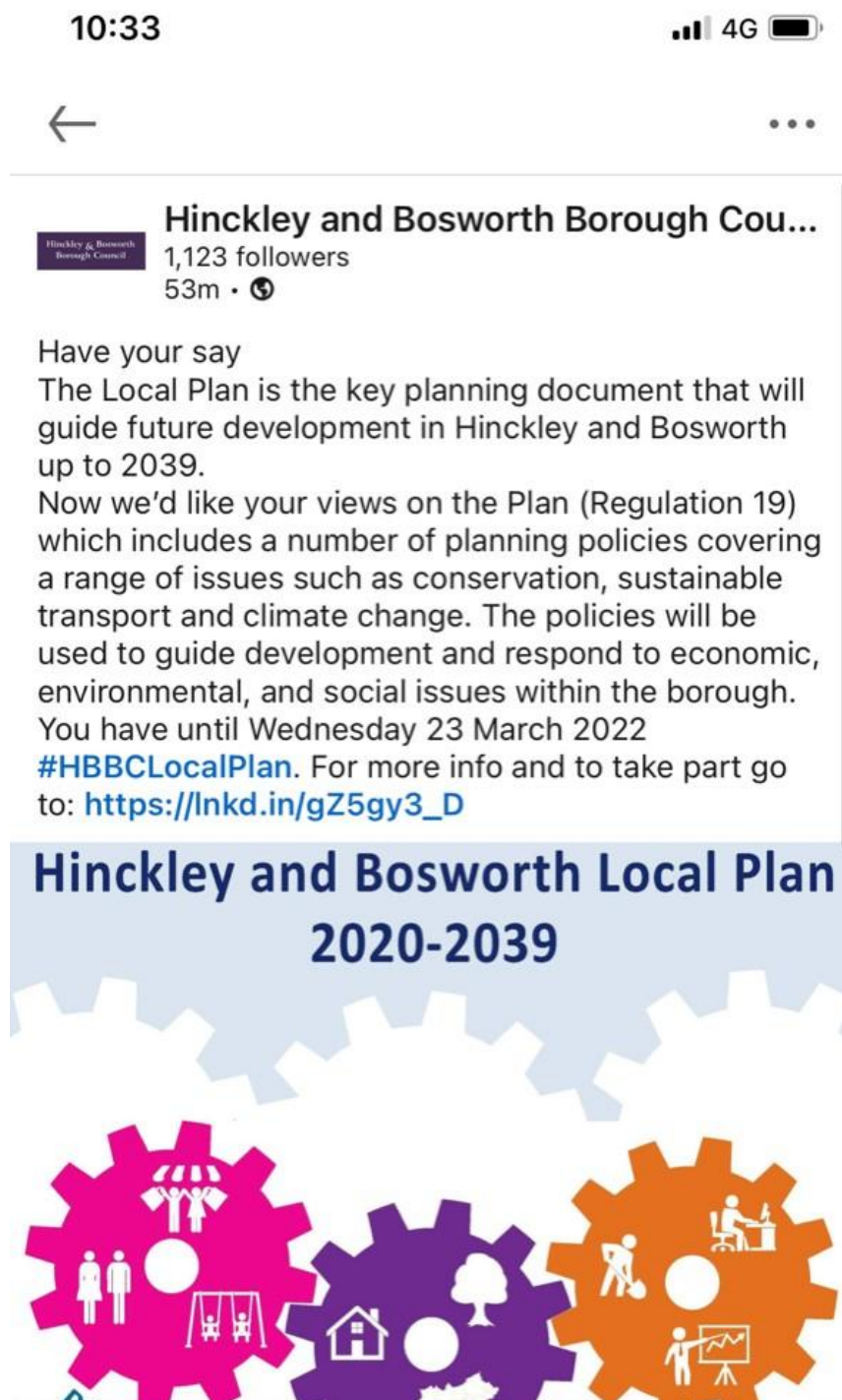


Figure 3: Press Release which was issued at the start of the consultation

Hinckley & Bosworth Borough Council

Hinckley Hub, Rugby Road, Hinckley, Leicestershire, LE10 0FR

PRESS RELEASE

ISSUED 10 FEBRUARY 2022

Have your Say on the Local Plan

Residents, community groups, local businesses and others with an interest in the area are invited to give their views on the pre-submission version of the Hinckley and Bosworth Local Plan in a consultation which has launched this week.

The Local Plan is the key planning document for the borough that will guide future development in Hinckley and Bosworth up to 2039. It sets out a preferred strategy for housing and economic growth and includes a number of planning policies covering a range of issues such as conserving and enhancing the natural and historic environment, sustainable transport, good design and responding to the challenges of climate change. The policies will be used to guide development and respond to economic, environmental and social issues within the borough.

As a result of feedback from the previous consultation in 2021, officers have now progressed the Local Plan to the next formal stage known as Regulation 19 (Publication). Now the council is seeking views on this document and the next steps will be submitting the Local Plan to the Planning Inspectorate for Examination in Public.

Once it has completed this process, it will form the council's future framework for decision making on planning.

Councillor David Bill, Executive Member for Planning at the Borough Council said:

"The Local Plan sits at the heart of the planning system and provides the framework against which all planning decisions are considered. The Council has worked hard to

progress it and we are pleased to have had support from senior government officials over our approach and progress on the Plan to date.

While we have experienced some well documented delays incurred as a result of waiting for relevant support information from the County Council on key matters such as education and highways infrastructure, we now need to move the plan forward to meet the Government's deadlines. We also remain fully committed to supporting the production of Neighbourhood plans in this borough and we congratulate the work of volunteers in our communities for the effort and work they have put in to advancing them.

We've now called on partners to engage in constructive dialogue. With this in place, we can help protect communities from unwarranted development and guide it to more appropriate areas set out in the Local Plan and Neighbourhood Plans."

Members of the public and businesses are invited to attend virtual events where planning officers will answer questions, discuss views and provide advice on how to submit comments. For further details on the consultation and to book at place at an event go to www.hinckley-bosworth.gov.uk/localplanreview

As well as being available to view and download on the website, printed copies of the document will be located at selected libraries within the borough and at the Hinckley Hub.

The consultation is open until 5pm on 23 March 2022.

ENDS

NOTES FOR EDITORS

For more information contact:

Figure 4: The Borough Bulletin Spring Edition 2022 Article

What kind of borough would you like to live in?

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Figure 5: Copy of the poster sent to parish councils and displayed at the Hinckley Hub

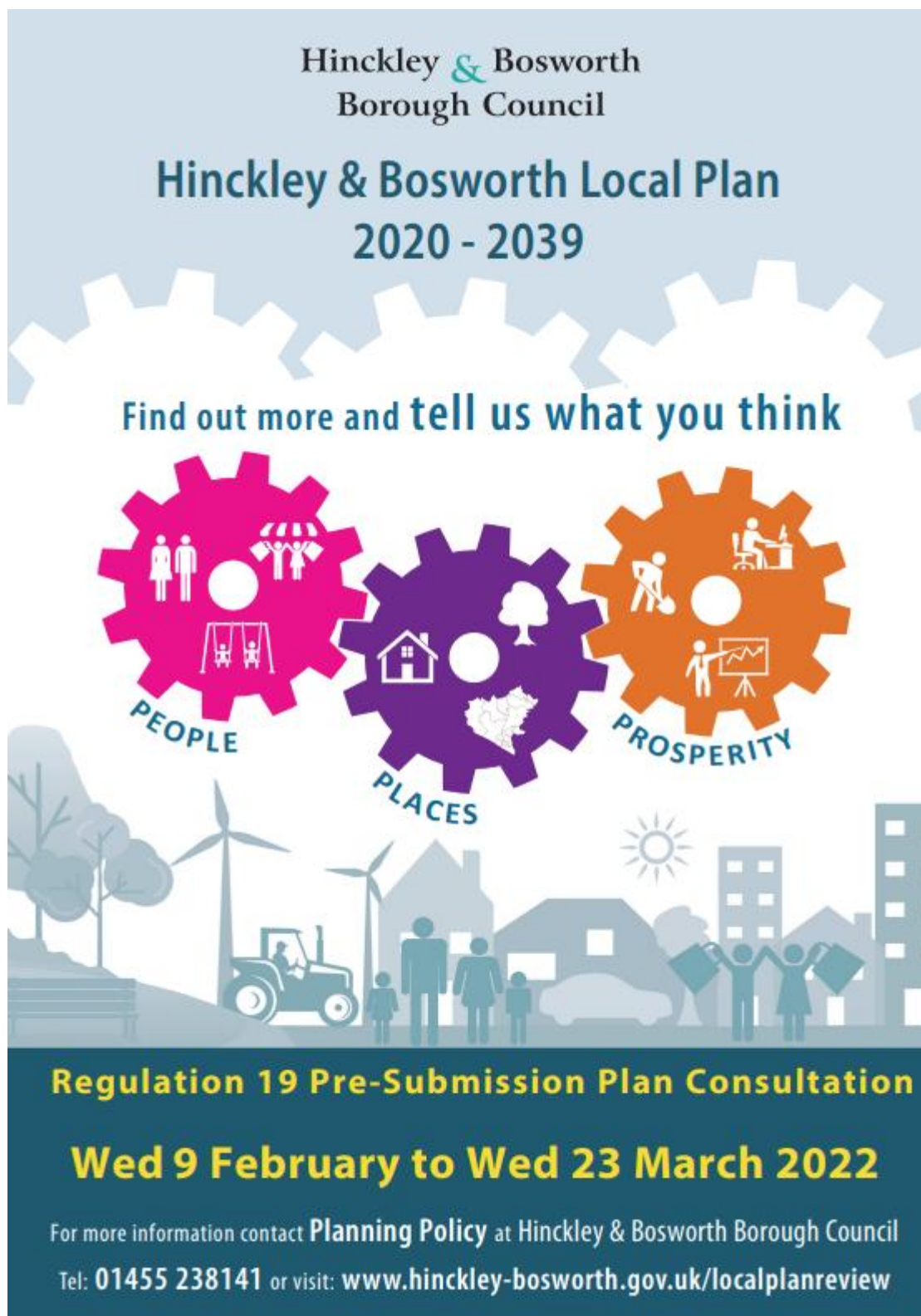


Figure 5: Letter issued to those on the Local Plan Consultation Database



Bill Cullen MBA (ISM), BA(Hons) MRTPI
Chief Executive

Please ask for: Planning Policy
Direct dial/ext: 01455 238141
Email: planningpolicy@hinckley-bosworth.gov.uk
Customer Ref No: **INSERT**
Our ref: Draft Local Plan Reg 19
Date: **09/02/2022**



**Hinckley & Bosworth
Borough Council**

ADDRESS

Dear **INSERT**

**Hinckley & Bosworth Draft Local Plan (Regulation 19) Submission Consultation
Wednesday 9 February 2022 to 5pm on Wednesday 23 March 2022**

You are receiving this letter as you are on our Local Plan consultation database. This is because you previously commented on planning policy documents or requested for your details to be added to the database for future consultations.

The Borough Council is inviting you to comment on the Draft Local Plan from **Wednesday 9 February to 5pm on Wednesday 23 March 2022**. Any comments on the documents need to be made during this period.

As a result of feedback from our previous consultation on the Draft Local Plan (Regulation 18) in 2021, we have now progressed the Local Plan to the next formal stage known as Regulation 19 (Publication). The Regulation 19 Local Plan is the document that will be submitted to the Planning Inspectorate for Examination in Public. It is the version that the council seeks to adopt, subject to that examination, as the future framework for decision making on planning.

You can view and download all the relevant documents from our website: <https://www.hinckley-bosworth.gov.uk/localplanreview>. Paper copies will be available for reference use at a number of locations across the Borough including some libraries and at the main council's office the Hinckley Hub, Rugby Road, Hinckley, **Leics**, LE10 0FR. The website contains more details about the consultation and how you can submit your representations to us. A number of virtual events will be held and the details of these will be placed on our website in due course.

If any of your contact details on this letter are inaccurate, if you are receiving this communication by post and have an email address, or if you no longer wish to receive updates relating to the local plan please let us know using the contact details below or via email to planningpolicy@hinckley-bosworth.gov.uk quoting your customer reference number at the top of this letter.

Yours faithfully

Kirstie Rea
Planning Manager (Policy)



Scan the QR code with a smart-phone or visit
www.hinckley-bosworth.gov.uk/localplan

Appendix B: Summary of Main Issues Raised

Table 2: Main issues raised by policy

Policy	Main Issues Raised
CC01: Mitigating and adapting to climate change	General Comments • Lack of clarity and enforceability: the policy requires a Sustainability Statement but does not specify how it will be assessed. • Carbon neutrality goal: Supporting Hinckley & Bosworth's aim to be carbon neutral by 2050 is noted, but this is seen as too vague to guide development effectively. • Transport and location: insufficient evidence has been provided on how sustainable transport modes will be delivered or how they will reduce carbon emissions. Objections • Ambiguity in terminology: Terms like "active design" and "circular economy principles" are unclear and need definitions. • Viability concerns: No Viability Appraisal has been published to support the policy's requirements. • Building Regulations confusion: References to Building Regulations are seen as inappropriate within planning policy, as they are governed separately. • Duplication of policy content: Some elements of CC01 are repeated in other draft policies, leading to unnecessary overlap. • Spatial strategy disconnect: IM Land argues that the spatial distribution of development does not align with CC01's climate goals. • Assessment criteria missing: Developers are concerned that without clear standards, decisions may rely too heavily on subjective judgment. • Carbon costing requirement: The idea of "carbon costing" is vague and potentially unrealistic for smaller applications. • Legal compliance: One objection states the Plan fails to demonstrate how it contributes to climate change mitigation, breaching Section 19(1F) of the Planning and Compensation Act 2004. Support

	Severn Trent Water supports the inclusion of water efficiency targets (110 litres per person per day) and the use of Sustainable Drainage Systems (SuDS), and recommends referencing the Drainage Hierarchy as best practice.
CC02: Flood Risk	General Comments - Natural flood defences: These are often cheaper and should be considered first to reduce flooding. Measures like slowing rainwater runoff are encouraged. - Wetherley-specific suggestions: Natural flood management techniques are cost-effective for small-scale local projects. Community-led efforts (e.g. with Woodland Trust) can help mitigate flood risk. Benefits include carbon sequestration, biodiversity, and alignment with climate policies (CC01). Techniques include tree planting, reed beds, shrubs, and retaining structures. Maintenance is low-cost and sustainable. Objection - Policy vagueness: The flood risk policies are seen as inconsistent with national policy. - Recommendation: Remove local policies and rely on national guidance for flood risk and sustainable drainage systems. Support - Severn Trent Water supports the inclusion of a flood risk policy and recommends protecting and enhancing existing drainage features, such as ditches and watercourses; daylighting culverts to improve biodiversity and reduce flood risk; and emphasising the Drainage Hierarchy to secure sustainable surface water outfalls.
CC03: Sustainable Drainage Systems	Objection - Policy vagueness and inconsistency: The policies are seen as vague and not aligned with national policy. - Recommendation: Remove these local policies and rely on national guidance for flood risk and SuDS. - Terminology clarification needed: The term “large scale developments” is used but not defined. It may refer to “major proposals” (as per paragraph 5.18), but this needs to be clarified and justified. Support

	• Severn Trent Water: Expresses support for the principles outlined in Policy CC03. Repeats support in multiple entries, indicating strong endorsement. • General support for flexibility: The policy allows for exceptions where SuDS are not technically, operationally, or financially viable. Representors agree with the need for evidence when SuDS cannot be implemented. • Suggestion: Greater weight should be given to the financial impact of SuDS on development viability.
CC04: Renewable and Low Carbon Energy	General Comment • The NDP household survey shows strong support for solar panels, ground source energy and wind power. • Policy CC04 places too much emphasis on wind turbines and does not adequately highlight solar panels, which is considered to contradict local evidence. • Include a broader mix of renewable energy options in the Local Plan. • Address practical concerns: wind turbines may face operational issues during storms, which are expected to increase with climate change, and turbine blades present recycling challenges at the end of their lifespan.
CC05: Sustainable Design and Construction Measures	Support • General Support for CO₂ Reduction: Several respondents (e.g. BHL) support aligning with the 2021 Edition of the 2010 Building Regulations (Part L) for CO₂ emissions reduction. • Encouragement for Exceeding Standards: Support is expressed for developments that exceed minimum standards, such as those achieving the Home Quality Mark (HQM) or Passivhaus, but with caution about making these a requirement. • Water Efficiency: Severn Trent recommends including water efficiency measures in both construction (e.g. reusing surface water) and building design (e.g. 110 litres/person/day for residential, BREEAM for non-domestic). Objection • Passivhaus and HQM Standards: multiple objections argue that these standards go beyond national policy and lack a local evidence base. Concerns were raised that including them, even as encouragement, makes the policy

	unclear and inconsistent with NPPF paragraph 16(d), which requires policies to be clear and unambiguous. Passivhaus was also seen as technically and commercially demanding, particularly without local justification. • Duplication of Building Regulations: Some argue that sustainable design is already covered by Building Regulations, and planning policy should not duplicate these controls. • There is concern about the lack of expertise within planning departments to assess technical documents such as Circular Economy Statements. • Viability and attractiveness: requiring higher local standards could increase development costs and reduce the borough's attractiveness for investment. One representation suggests that, while sustainable design is important, its cost implications should be balanced against other developer obligations.
CLT01: Community Facilities	General Comment • Schools are valued as community hubs, especially outside school hours and during holidays. • All new schools under the Local Plan will be academy (free) schools, run by Academy Trusts (charitable/commercial entities) and controlled by the Department for Education (DfE). • Academy schools are unlikely to enter into shared-use or joint-management agreements with councils or other organisations. • Such agreements are discouraged if they pose a financial risk to the school's operation (as judged by the Trust, County Council, or DfE).
CLT02: Public Houses	General Comment • CAMRA welcomes the retention of Policy CLT02 from the earlier draft. • They support the removal of the urban/rural distinction for public houses. • Objection to Criterion (i): ◦ This criterion allows for the loss of all but one public house in a rural settlement.

	○ CAMRA argues this is too restrictive and does not reflect the varied roles pubs play in community life. ○ It is inconsistent with the National Planning Policy Framework (NPPF), which promotes sustainability in rural areas. • Unlike other community facilities in Policy CLT01, public houses are unfairly limited by this criterion. • CAMRA requests that criterion (i) be deleted before the Draft Local Plan is submitted for examination.
CLT03: Cultural and Tourism Facilities	Objection • Main issue: the policy is considered ineffective. • Reason: it does not reference '<i>A National Forest Design Guide: Sustainable Tourism Accommodation</i>'. • Suggested change: although this Design Guide is mentioned in Policy EP07, the objector considers Policy CLT03 to be the more appropriate location for this reference.
EP01: Scale and distribution of new employment sites	General Comments • Green Space & Village Identity: Concern about the IM Properties development in Groby encroaching on nearby villages and the importance of preserving green spaces for leisure. • A5 Corridor Infrastructure: Emphasis on the need for improvements along the A5 corridor before allocating employment land under Policy EP01. Warns against exacerbating existing congestion and capacity issues. • Economic Prosperity Chapter (EP01 and EP02): notes that only one employment site, MIRA, is allocated, while many housing sites are allocated. It highlights unmet demand for small and mid-sized industrial units, especially in Earl Shilton, and cites delays in the delivery of employment land in the Strategic Urban Extensions at Barwell and Earl Shilton, with likely delivery not until the 2030s. Support • Supports the identified location for distribution and logistics in the Local Plan. Reserves the right to revise its position if new evidence emerges. Objections

	• Lack of Local Employment Allocation: The plan fails to allocate land to meet local employment needs as recommended by the Employment Land & Premises Study. Site LPR32 is highlighted as suitable for Groby, Ratby, and Markfield. • Inadequate Economic Growth Strategy: the Plan does not meet objectively assessed needs. Criticism was raised about reliance on BUR01E (Hinckley Sewage Treatment Works) for 73% of new employment land without sufficient evidence of deliverability. • Policy EP01 confusion: concerns were raised about repetition of SS02 and vague language on site selection, despite allocations already being made. It was suggested that the policy should include specific allocations and additional flexibility. The site south of Little Shaw Lane, Markfield, was promoted as a viable employment site. • Climate change mitigation: the plan lacks evidence that it contributes to climate change mitigation, contrary to Section 19(1F) of the Planning and Compulsory Purchase Act 2004. Concerns were raised about carbon emissions from greenfield development and infrastructure. • Ad Hoc Employment Planning: Criticism that the plan does not clearly plan for future employment land needs. Raises concerns about loss of employment land to housing and lack of clarity on site flexibility. Notes that some sites are unfairly deprioritised due to tree coverage, which could be mitigated. • Urgent Need in Earl Shilton: Longstanding shortage of employment land in Earl Shilton since 2012. Delays in delivery of allocated sites. Promotes land at Leicester Road (LPR12 & LPR56) as available, deliverable, and suitable for small business units.
EP02: New employment development	Support • Support for the economic focus but reserves the right to revise its position. • Other representations support Policy EP02 in principle, particularly for non-allocated sites, but suggest that applications should include need and demand assessments and that further clarity should be provided on the scale and distribution of employment land. Objection

	• The policy should better reflect NPPF paragraphs 82(d) and 83. • It should allow for flexibility and accessibility to strategic road networks. • There is a need for more employment land to meet strategic and local demand • Others support the criteria-based approach but want clearer recognition of economic growth needs. • General opposition was raised to any development in Groby, particularly warehousing allocations, employment allocations and sites LPR49A and LPR49B.
EP03: Existing employment areas	Objection • Concerns were raised about how this policy affects the representor's land. • While the policy allows Category B employment sites to be released for other uses, it is seen as inflexible and outdated.
EP04: Existing non identified employment areas	Objection • Representors argue that if a site was suitable for ongoing employment use, it would have been included in the latest ELPS. Therefore, such sites should be considered suitable for alternative uses. • The policy should better acknowledge the demand for strategic distribution and logistics floorspace. • There is strong market demand, including for smaller-scale logistics units, not just large ones (9,000+ sqm). • The emerging Local Plan should reflect this demand or allow for it through speculative planning applications.
EP05: MIRA Site	General Comment • Concern that planning applications at MIRA are approved without requiring native planting or biodiversity net gain. • Suggests mandating solar panels on all developments. • Recommends using opportunities like the proposed hotel development to push for green infrastructure (e.g. green walls). • Emphasises applying Policy NAT08 consistently to all MIRA developments.

	• Policy EP05: Part C Criticism: Argues that requiring evidence of need for complementary uses (Part C) is onerous and unreasonable. Suggests that Part B alone should guide decisions on alternative uses. Support • Recognises the strategic importance of the MIRA site and its role in the wider economy. • Supports the inclusion of the additional 47 hectares allocated in the North Warwickshire Local Plan. Emphasises the need to ensure that future employment needs (Policy EP01) do not compromise the delivery of MIRA expansion, especially in terms of A5 highway capacity. Objection • Objection queries why the representor's land at Desford has not been considered in a similar manner to MIRA, despite its potential employment benefits. • States that the Desford site may currently generate more employment than MIRA. • Challenges whether the scale of MIRA's allocation is justified. • Argues that if MIRA is acceptable in sustainability terms, then the same should apply to Desford. • Calls for equal treatment in terms of growth and development encouragement.
EP06: Education and Skills for a Strong Local Workforce	General Comment • A representation suggests this policy should be better linked to social value and levelling up objectives, particularly in relation to site allocations and development opportunities (e.g. land at Desford). Support • No explicit support is recorded in the table. All entries are either objections or general comments. Objection • No national policy basis for requiring a Local Employment & Training Strategy via S106. • Threshold for applying this policy is too low; should apply only to large-scale developments (100+ dwellings).

	• Should be viability tested as part of the Plan Viability Assessment. • Wording on education provision contributions is imprecise and should align with NPPF paragraph 57. • Impact on Small Builders: HBF argues the policy disproportionately affects small and medium-sized developers. These companies may lack resources to prepare a strategy. Emphasises the importance of diversity in the housebuilding industry. Policy EP06 is considered unsound (not positively prepared, justified, effective, or consistent with NPPF para 35). Calls for modification before submission of the Local Plan. • One representation acknowledges the positive impact of major development on employment but argues there is no national requirement for such contributions. Recommends deleting the policy entirely.
EP07: Growing and Diversifying the Rural Economy	General Comment • The policy is generally considered sound. • However, the last line references '<i>A National Forest Design Guide: Sustainable Tourism Accommodation</i>'. • It is suggested that this reference would be more appropriate in Policy CLT03 (Cultural and Tourism Facilities). • If the reference remains in EP07, it should be clearly stated that the Design Guide applies only to sites within the National Forest. Support • Support was expressed for Policy EP07, particularly paragraph 8.27. ○ The policy is generally supported by representors. ○ Acknowledges the importance of supporting economic growth in rural areas. ○ Notes that the Borough's rural areas are small in scale and well connected to urban areas and service centres. ○ Support was expressed for proposals that: ▪ grow and diversify the rural economy; ▪ secure local employment; and

	- enable agricultural growth and diversification. Objection - No additional objections beyond the general comment were listed in the table.
HE01: Conserving and enhancing the historic environment	General Comment - Support for the policy's intention to conserve and enhance the historic environment. - The policy lacks clarity on how proposals affecting heritage assets should be assessed. - A clause should be added stating that developments affecting designated heritage assets will be assessed against NPPF paragraphs 200-204. - This change is needed to ensure the policy is consistent with NPPF paragraph 35(d) on soundness and paragraph 16(d) on clarity and decision-making.
HE02: Heritage Assets	Objection - Criterion d repeats wording from NPPF paragraph 201. - Criteria h and i suggest enabling development is the default solution for securing viable uses of heritage assets and specifically for heritage at risk, which is not always true. - This same issue appears in paragraph 11.26 of the main text, where wording duplicates NPPF requirements and again implies enabling development is the primary solution for heritage at risk.
HO01: Provision of New Housing	General Comments - Over-reliance on Strategic Urban Extensions (SUEs): Concern that many SUEs have not yet been delivered, raising questions about their deliverability. Suggests the need for additional allocations. - Policy HO01: recommends including land north of Normandy Way for 1,300 homes as an additional allocation to support flexibility and address unmet housing needs from Leicester City. Objections Market Bosworth (LPR139): - Objection to development on productive arable land.

- Concerns about food security and loss of scenic views.
- Presence of a spinney with a blanket Tree Preservation Order (TPO).

Climate Change Compliance:

- The plan lacks evidence of contributing to climate change mitigation.
- Concerns over carbon emissions from greenfield development and infrastructure.

Site Selection Process:

- Criticism of paragraph 7.1 of the Pre-Submission Draft.
- Claims the sustainability appraisal and transport modelling are incomplete.
- Infrastructure impacts not properly assessed due to missing Phase 2 Infrastructure Delivery Plan.

Support

Rothley Brook Green Wedge (LPR49A & LPR49B):

- Support for retaining these sites as farmland and protecting the green wedge.

Laurel Farm, Groby:

- General support for the proposal.

Station Road, Market Bosworth:

- Support for Phase 2 housing development.
- Emphasis on walkability, potential job creation, and need for improved public transport and green energy.
- Suggestion for a perimeter road to manage traffic.

STA01H Site Allocation:

- Support for the proposed site.

THO02H Site Allocation:

- Belief that the site is locally beneficial and deliverable.

Desford Neighbourhood Plan Sites:

- Support for allocating reserve sites including land north of Kirkby Road (Ashfield Farm).
- Site is deliverable and controlled by a housebuilder.
- Suggests updating maps to reflect these allocations.

HO02: Housing Mix, Size and Type

General Comments

- Supports Policy HO02's approach to housing mix based on up-to-date evidence.
- Recommends that flexibility (e.g. site-specific needs, viability, economic conditions) be embedded in the policy wording, not just the supporting text.
- Stresses the need for a full Viability Assessment to ensure policy deliverability.
- Without this, the policy may not meet NPPF paragraph 35c (effectiveness).

Support

- No distinct entries labelled as "Support" in this table, but general comments express conditional support for Policy HO02 if recommended changes are made.

Objections

- Thornton: Concern over the number and location of new homes. Highlights traffic congestion, narrow roads, lack of parking, and pedestrian safety. Emphasises danger to children and emergency access.
- Objects to the prescriptive nature of the housing mix in Policy HO02.
- Argues it contradicts the Housing Needs Study (2019) which recommends flexibility.
- Claims the policy is unclear, inflexible, and not aligned with NPPF paragraphs 16(d) and 82(d).
- Suggests the mix should be indicative and based on market signals.
- Terminology Concern: Objects to the phrase "most up-to-date" evidence. Argues it should be "up-to-date" and that the Council must maintain current evidence.
- Policy HO03: NDSS Compliance: Objects to the requirement for Nationally Described Space Standards. Claims lack of evidence on need, viability, and affordability. Recommends deletion of the policy unless supported by a robust local assessment and viability study.
- Table 7 vs Housing Needs Study: Objects that Table 7's suggested mix does not align with Figure 3 of the Housing Needs Study. Recommends site-by-site determination of housing mix based on market and site characteristics.

	• Prescriptive Nature of Policy: Objects to lack of clarity on whether the mix is a guide or mandatory. Argues the policy does not reflect market demand and is overly prescriptive. • NDSS Justification (additional comment): Reiterates that the Local Plan lacks evidence to justify NDSS requirements. Notes Planning Practice Guidance requires such evidence for policy inclusion.
HO03: Space Standards	General Comments • Viability and Justification: Multiple comments note that Policy HO03 lacks sufficient justification and has not been viability tested. NDSS should only be applied where there is a clearly evidenced need and where viability has been considered (as per NPPF footnote 49 and PPG guidance). The Council's evidence (e.g. RIBA research and internal space standards report) is considered insufficient to justify NDSS requirements. • Conversions and Flexibility: Concern that applying NDSS to conversions (e.g. above shops) may sterilise usable space and lead to vacancy. Suggests NDSS should not be universally applied, especially where it may hinder development. • Acknowledges the aim of high-quality housing but stresses the need for flexibility. • Recommends NDSS be applied selectively (e.g. by tenure or dwelling size) and only after full viability testing. Objections • Affordability and Market Impact: NDSS could lead to larger, more expensive homes, reducing affordability. Larger homes may be inefficient and harder to maintain. Could limit housing choice and increase costs for buyers. • Evidence Base and Soundness: Several objections argue that the Council's evidence (e.g. 73% of homes not meeting NDSS) is not sufficient to justify the policy. Lack of analysis on quality of life, market demand, or housing performance. NDSS should not be applied rigidly; flexibility is needed. • Viability Testing: The policy has not been tested for its impact on viability. Without a published viability assessment, the policy is considered unsound. Risk of undermining housing delivery and delaying development. • Policy Application and Clarity: Concerns about applying NDSS to all dwellings, including conversions and change

	of use. Suggests transitional arrangements are needed for sites already in the planning system. Resident Concerns (Thornton): Objection to housing growth in Thornton due to traffic congestion and safety risks. Highlights infrastructure limitations and pedestrian hazards.
HO04: Housing Density	General Comments - Increased Urban Density Welcomed: Support for raising minimum net density from 40 to 45 dwellings per hectare in urban areas. Suggests rural density should also be increased from 30 to 35 dph for Key Rural Centres, Villages, and Hamlets. - Supports the principle of efficient land use. - Concerned that proposed minimum densities (45 dph urban, 30 dph rural) are overly prescriptive. Notes these figures are significantly higher than historic averages (34 dph urban, 24 dph rural). Recommends a range of densities based on accessibility and site context. Calls for a Viability Assessment to ensure deliverability and consistency with other policies (e.g. HO03 NDSS). Support - No entries explicitly labelled as “Support” in this table. However, the first general comment and BHL’s remarks show conditional support for the policy’s intent, if modified for flexibility and viability. Objections - Supports design-led approach but objects to conflicting minimum density targets. Argues 30 dph is too high for rural areas; evidence shows 24 dph is typical. Notes National Design Code does not set rural density standards. - Internal Inconsistency: Policy is contradictory: claims to be design-led but imposes fixed density targets. Confusing for developers and decision-makers. - Evidence and Viability Concerns: Policy relies on guidance documents rather than robust evidence. Suggests viability should be considered to support affordable housing delivery. - Policy is not clearly written or justified. - Aspirational targets (45/30 dph) should not be enforced as minimums.

	• Recommends deleting minimum density standards. • Proposes differentiated density targets: ○ 45 dph in urban areas, ○ 35 dph on land adjoining urban areas, ○ 30 dph in rural areas. • Highlights inconsistency in Council's own allocations (e.g. Burbage sites showing only 18 dph). • Site-Specific Flexibility Needed: Blanket density figures fail to reflect local character and accessibility. Recommends site-by-site assessment. • Design vs Density Conflict: Concern that minimum densities may lead to repetitive, high-density developments. May not support a full mix of housing types or align with PMD01 objectives.
HO05: Accessible Housing	General Comments • Recommends increasing the requirement for wheelchair accessible homes to 10% (M4(3)), with the remaining 90% meeting M4(2) standards. • Supports the policy in principle, based on the 2019 Housing Needs Study. Emphasises the need for a comprehensive Viability Assessment. Suggests the policy should be flexible, allowing for site-specific viability and constraints. • Highlights the critical need for specialist housing for older people. Notes significant projected growth in elderly population. Argues that adaptable housing alone is insufficient to meet elderly needs. Recommends redrafting Policy HO05 to explicitly support sheltered and extra care housing. • Warns that the policy may duplicate Building Regulations if national changes are implemented. • Stresses that any local standards must be justified by robust evidence and viability tested. Support • No entries explicitly labelled as "Support", but some respondents express conditional support if the policy is made flexible and evidence-based. Objections

	• Argues that referencing an ageing population is not sufficient justification for applying optional standards. Notes that M4(3) should only apply to dwellings with Council nomination rights. • Reiterate that specialist housing is essential and not addressed in Policy HO05. Claim the policy fails the soundness tests of the NPPF (not positively prepared or effective). • Objects to mandatory application of M4(2) and M4(3) standards. Argues that these are optional under national policy and require local justification. Highlights viability concerns, especially for market housing. Notes that existing housing stock and market preferences are not considered. • General Viability & Evidence Concerns: Multiple objections cite lack of a published Viability Assessment. Claim the policy is not justified, not effective, and not consistent with national policy. • Threshold & Applicability Issues: Suggests M4(3) requirement should only apply to developments of 20+ dwellings. Questions the 5% target and its applicability to market housing. • Infrastructure Concerns: One objection raises issues about local amenities (schools, doctors, dentists) struggling with population growth. • Objects to the 5% requirement for developments of 100+ dwellings. Argues lack of evidence and practical challenges in implementation.
HO06: Self-build and Custom Housing	General Comments • Supports the inclusion of a self-build/custom-build policy in principle. Recommends the policy wording (not just supporting text) should specify that unsold plots after 12 months revert to market housing. • Supports the 12-month reversion mechanism, but raises concerns about the lack of evidence for the 5% requirement, the validity of Custom and Self-Build registers, practical delivery issues such as access, infrastructure and design consistency, and the need for needs assessment and viability testing. It suggests removing the blanket requirement if it is not justified. Support

	• No entries explicitly labelled as “Support”, but respondents express conditional support for the concept if the policy is revised for clarity, flexibility, and evidence. Objections • Argues there is no legislative or national policy requirement for developers to provide CSB plots. Believes the Council’s register does not reflect actual demand. Notes practical issues with vacant plots and coordination. Suggests limiting the policy to smaller developments or using an exceptions policy. • Concerned about impact on tourism and local character. • Objects to the 100+ dwellings threshold. Highlights logistical and health & safety challenges. Warns of negative impacts on viability and consumer satisfaction. Recommends deletion of the policy due to lack of justification. • Cite precedent from Blaby Local Plan Inspector rejecting similar policies. • Argue the policy will not boost housing supply and may cause street-scene gaps. • Notes low demand, with only 60 expressions of interest, and recommends removal or amendment of the 5% requirement. • Suggests the 5% M4(3) target should only apply to developments of 20+ dwellings, implying similar logic should apply to CSB provision.
HO07: Gypsies, Travellers and Travelling Showpeople	General Comments • Hinckley and Bosworth Borough Council (HBBC) states it cannot meet its own needs for gypsies and travellers. • Policy HO07 and paragraph 7.29 suggest working with partners to identify and allocate sites, possibly beyond the borough. • It is unclear whether provision will be within HBBC or elsewhere. • No formal Duty to Cooperate actions have been taken with neighbouring authorities. • There is no published evidence demonstrating HBBC’s inability to meet its own needs.

HO08: New Housing in the Countryside

General Comments

- Notes Hinckley and Bosworth's historic difficulty in maintaining a 5-year housing land supply.
- Suggests the policy should allow development in sustainable countryside locations if needed to maintain supply.
- Recommends the Plan include flexible guidance to support housing delivery beyond settlement boundaries.

Objections

- Policy Misalignment with National Planning Policy: Policy HO08 is seen as too restrictive and not aligned with the National Planning Policy Framework (NPPF). Fails to reflect the flexibility encouraged by the NPPF for rural development. Does not address scenarios where Paragraph 11 is engaged (e.g. lack of 5-year supply or outdated policies).
- Need for Additional Exception Criteria: Suggests adding a criterion to support housing in sustainable edge-of-town/countryside locations when supply is insufficient.
- Settlement Boundaries Criticised: Objects to the use of settlement boundaries, calling them arbitrary and restrictive. Argues the policy lacks flexibility to respond to changing circumstances, such as housing shortfalls. Notes reliance on strategic sites with planning challenges, making flexibility even more critical.
- Soundness and Deliverability Concerns: Policy is not considered positively prepared or effective. May prevent sustainable sites from coming forward. Recommends amendments to ensure compliance with Paragraphs 11 and 16(b) of the NPPF.

HO09: Affordable Housing

General Comments

- Evidence and Clarity: Calls for evidence to justify the proposed tenure mix (as per NPPF paragraph 35). Suggests Table 8 should be moved to supporting text and used as guidance only. Requests clarification on what constitutes 'significant clustering'.

Support

- Supports Policy HO09's requirement for 20% affordable housing within or adjacent to Hinckley. Confirms their proposed development to the north of Hinckley can meet this requirement.

	Objections • Supports a differentiated approach but objects due to lack of Viability Assessment. Stresses that viability must be tested at the plan-making stage. Notes that affordable housing tenure mix aligns with national policy (10% affordable home ownership). Requests publication of viability evidence before submission. • Tenure and Clustering Concerns: Policy wording on tenure is unclear and needs redrafting. Any mix must be justified by up-to-date evidence. Criticises the poorly defined objective of avoiding clustering. Notes that registered providers often prefer grouped stock for management efficiency. • General Viability Concern: Notes that the plan proposes 20% affordable housing for urban sites and 40% for rural sites (10+ dwellings). Again, viability evidence to support these targets is missing.
HT01: Highways and Transportation	General Comments • Transport Assessment Missing: Leicestershire County Council notes the absence of a transport assessment in the Regulation 19 evidence base. Concerns about lack of consideration for strategic and local road network capacity. Policy HT01 deemed unsound due to lack of justification and positive preparation. • Critique of Transport Assessments: Questions the reliability and objectivity of applicant-led Transport Assessments. Notes issues with modal shift assumptions, transport modelling complexity, and effectiveness of Travel Plans. Criticises Leicestershire CC's support for road schemes over sustainable transport. Highlights lack of clarity on: Who assesses TA suitability. What services/facilities require walking/cycling access. What constitutes well-designed sustainable transport infrastructure. • Employment Development Consideration: Suggests giving special weight to employment sites well-connected to settlements. Emphasises their contribution to sustainability and active travel. Support • Two entries express general support for the policy without detailed comment.

	Objections • Climate Change Compliance: Plan fails to demonstrate how it contributes to climate change mitigation. Concerns over carbon emissions from greenfield development and infrastructure. • Policy Wording and National Consistency: HT01 uses terms like “significant adverse impact” which contradict NPPF’s “severe” impact test. Calls for policy to be rewritten for consistency with national policy. • Site-Specific Objection: NEW01H: Site lacks proximity to bus services and pedestrian connectivity. Therefore, does not meet HT01’s criteria for minimising travel and maximising sustainable transport.
HT02: Parking Standards	General Comments • Sustainable Transport Commitment: The Council’s commitment to sustainable transport is acknowledged and welcomed. • Parking Standards Location: Concern that parking standards are not included in Policy HT02 itself but are instead referenced in the Leicestershire County Council Highways Design Guide, a separate and extensive document. Suggestion to include car and cycle parking standards in an Appendix to the Local Plan for clarity and accessibility. • Car Parking for Older Persons’ Housing: Argues that current standards may lead to overprovision of parking for specialist older persons’ housing. Evidence from McCarthy & Stone developments shows: Average age of entry is 76 years. Around 18% give up car ownership at or near the time of moving in. In Extra Care schemes, average age is 83, with even lower car ownership. Supports a bespoke parking assessment approach for older persons’ housing. • Cycle Parking for Older Persons’ Housing: ○ Survey of 242 units showed only 7 bicycles owned (1 per 35 apartments). ○ Argues that cycle parking requirements for older persons’ housing are inappropriate and unnecessary. ○ Suggests cycle parking should be limited to staff and visitors.

	○ Notes that mobility scooter storage is more relevant and already provided. Support • No entries explicitly labelled as “Support”, but the general comments express partial support for the Council’s sustainable transport aims and bespoke parking assessments. Objections • One entry is labelled “Objection” but does not provide specific content or reasoning.
HT03: EV Charging Infrastructure	General Comments • Risk of Obsolescence: Installing a fixed quota of EV charging points may become outdated due to rapid technological advancements. Provision of cabling for future installation is seen as more practical. • Viability Assessment Missing: Multiple comments highlight the absence of a Local Plan Viability Assessment during Regulation 18 consultation, questioning whether EVCP costs have been properly accounted for. • Government Consultation Reference: BHL and others refer to the 2019 Department for Transport consultation, noting estimated costs (£976 per dwelling) and potential grid upgrade costs (up to £3,600), which could impact development viability. • Need for Flexibility: The evolving nature of EV technology and varying charging needs suggest that infrastructure should allow for future adaptability rather than fixed installations. Support • Supports EVCPs in principle but believes Policy HT03 should be deleted due to overlap with Building Regulations. • Recognises the importance of EV infrastructure and the alignment with Government proposals, but raises concerns about implementation and viability. Objections • Duplication with Building Regulations: Many argue that EVCP requirements are already covered under Part S of the Building Regulations (effective June 2022), making local policy redundant. Suggest deferring to national standards for consistency and clarity.

	• Viability Concerns: Cost of installation and grid upgrades could undermine housing delivery and other policy goals (e.g. affordable housing, net zero). Without a robust viability assessment, the policy is seen as unsound under NPPF para 35. • Flexibility and Technological Change: Fixed EVCP requirements may not suit all vehicle types or future needs. Preference for cabling infrastructure to allow residents to install tailored solutions later. • Effectiveness and Soundness: The policy fails the tests of soundness (not effective, not justified, not positively prepared). Recommend deletion or amendment to align with Building Regulations and allow for exemptions where costs are prohibitive.
HT04: A5 Improvement Corridor	General Comment • The A5 Strategy is supported by Leicestershire County Council and other authorities via the informal A5 Strategy Partnership. • Policy HT04 replaces Policy 5 from the 2006-26 Local Plan, which had broad proposals, most of which remain unimplemented. • The proposed dualling of the A5 between Dodwells Roundabout and Longshoot was abandoned in July 2021. • The May 2020 Infrastructure Capacity Study assumed the Dodwells, Longshoot scheme would mitigate development impacts, but this is no longer committed. • Numerous developments along the A5 (including those in adjacent authorities) have increased traffic, with no effective mitigation measures. • LP 13.23 references aspirations for the A5 to become an Expressway, but the strategy lacks formal status and funding. • RIS2 includes the A5 Hinckley, Tamworth as a pipeline scheme for RIS3, but progression depends on future studies. • Climate change impacts of new road schemes have not been addressed; evidence suggests new roads worsen emissions. • No evidence has been provided to show alternatives have been considered or that new schemes wouldn't cause further issues.

	- NPPF Paragraph 11 allows refusal of development if cumulative highway impacts are severe. Support - The Borough Council supports Policy HT04, recognising the need to assess and mitigate both individual and cumulative impacts of development on the A5. - It urges National Highways to consider refusing developments that significantly impact flow, capacity, and congestion, especially where they may prejudice existing allocations (e.g. MIRA). - Support is conditional on programmed and future highway improvements being completed, approved, and funded. Objection - Evidence Base & Viability - While the principle of developer contributions is supported, a robust transport evidence base is needed to determine appropriate levels. - The Council has not published its Infrastructure Delivery Plan, transport evidence, or Plan Viability Assessment. - The policy defers key infrastructure matters to the application stage, making it hard to assess its justification or effectiveness. - Policy Clarity & Consistency - The policy's test of "significantly adverse effect" does not align with NPPF Paragraph 111, which uses "severe" as the threshold. - It's unclear whether the policy applies only to an A5 corridor (not currently mapped) or to the whole Borough. - The term "significant adverse impact" is undefined, leaving developers uncertain about compliance. - Lack of clarity and consistency with neighbouring authorities may lead to unequal burdens and unintended promotion of development outside Hinckley & Bosworth.
INF01: Infrastructure and Delivery	General Comment Support for Allocation: The representation supports housing allocation at Land North of Hunts Lane, Desford,

and links it to the potential delivery of a GP surgery to address local capacity issues.

- Infrastructure Capacity & Viability:
 - The Infrastructure Capacity Study (May 2020) identifies challenges, especially around the A5.
 - The Plan acknowledges that infrastructure costs may affect viability and delivery of planning objectives.
 - The dualling scheme for the A5 was abandoned in July 2021, highlighting misalignment between Local Plans and transport infrastructure.
 - This misalignment has broader implications, particularly for climate change mitigation.

Support

- Indirect Support: The representation agrees with Policy INF01 and supports the idea that development at Hunts Lane could help deliver necessary infrastructure (e.g. GP surgery), aligning with broader policy goals.

Objection

- Infrastructure Planning & Delivery:
 - The Plan lacks a completed Infrastructure Delivery Plan and transport modelling, raising concerns about its robustness.
 - Leicestershire County Council (LCC) considers the Plan premature due to unresolved infrastructure needs and funding.
 - LCC and North West Leicestershire District Council object due to insufficient evidence that cumulative impacts on the highway network can be mitigated.
- Climate Change Compliance:
 - The Plan does not demonstrate how it contributes to climate change mitigation, making it non-compliant with Section 19(1F) of the Planning and Land Compensation Act 2004.
 - Significant greenfield development and associated infrastructure would increase carbon emissions, with no mitigation strategy provided.
- Policy Clarity & Viability:

	○ Policy INF01 is vague and lacks alignment with NPPF paragraph 57 regarding planning obligations. ○ The absence of a published Infrastructure Delivery Plan and Viability Assessment makes it impossible to assess deliverability. ○ References to PMD06 and HT01 relying on INF01 raise further concerns about effectiveness. • Market Bosworth Infrastructure Concerns: ○ MBPC highlights lack of holistic planning for Market Bosworth and surrounding villages (totalling 1175 dwellings). ○ Concerns include school capacity, transport (school buses, parking), and emergency services. ○ No infrastructure or transport impact assessment has been carried out to understand cumulative effects.
INF02: Water Supply and Wastewater Management	General Comment • Water Supply and Wastewater Infrastructure: Major developments must demonstrate adequate water supply and wastewater treatment capacity at the time of occupation. Infrastructure must be in place before occupation of the development or relevant phase. Plans referenced in paragraphs 14.14 and 14.15 (from 2018) are outdated and no longer reliable post-COVID. Concerns raised (including via FOI evidence) about local sewerage being overwhelmed, leading to pollution events. • Emphasis on infrastructure-first approach to protect environmental and public health. • Severn Trent's Investment Strategy: Severn Trent waits for sufficient certainty in development before investing in capacity improvements. This approach avoids speculative spending and ensures infrastructure charges are only used where development occurs. Developers must engage realistically about delivery timescales to allow timely infrastructure planning. Severn Trent provides general guidelines and policy wording to support understanding of their approach. Support • Severn Trent's Strategic Approach: Their rationale for waiting until development certainty is acknowledged as sound financial practice. Supports the principle of aligning

	infrastructure investment with actual development to protect customer funds. Objection • Outdated Evidence Base: Reference to 2018 plans (14.14 and 14.15) is challenged as no longer valid, especially post-COVID. Local evidence (via FOI) suggests sewerage infrastructure is already under strain, with pollution incidents occurring. • Infrastructure Lag: Concern that development is being permitted without adequate infrastructure in place. This risks breaches of policy and environmental harm, undermining health and wellbeing.
INF03: Telecommunications Infrastructure	Objection • An objection was recorded, but no supporting justification text was provided.
NAT01: Green Infrastructure	General Comment • Policy NAT01 Green Infrastructure refers to the “latest Borough Council Green Infrastructure Strategy,” but the text cites the 2020 GI Strategy, which has notable omissions: ◦ Lacks coverage of biodiversity importance. ◦ Includes inappropriate recommendations, such as: Management of private gardens. ‘Re-wilding’ of highway verges, which is still referenced but considered meaningless as a concept. • The 2020 GI Strategy is not considered an acceptable evidence base for biodiversity elements of green infrastructure. Support • No explicit support is stated in the table. However, the general comment suggests engagement with the strategy and a desire for improvement, which could be interpreted as constructive feedback rather than outright rejection. Objection • Paragraph 12.9 of the plan mentions that development may need to contribute to off-site green infrastructure gains, depending on location. • The objection raises concerns about:

	○ Lack of clarity on which locations would be required to contribute. ○ Uncertainty about the level of financial contribution expected. ○ The need for this contribution to be factored into the Viability Appraisal for the plan.
NAT02: Green Wedges	General Comment • Housing Need in Groby: Multiple representations argue that the HBLP fails to meet Groby's housing needs, partly due to historic under-provision and constraints from the Green Wedge. • Green Wedge Status: The Green Wedge is not formally recognised in the NPPF and does not carry the permanence of Green Belt. Its boundaries should be reviewed to accommodate sustainable development. • Site-Specific Analysis: BHL's land south of Sacheverell Way is argued to have limited strategic value to the Green Wedge and could be developed with minimal harm, supported by a Masterplan Report. • Review of Boundaries: The Green Wedge boundaries are based on outdated housing requirements and should be reassessed in light of current spatial strategy and unmet housing needs (e.g. Leicester). • Potential Benefits of Development: Development could enhance Green Infrastructure (GI), recreation, biodiversity, and landscape quality while retaining parts of the Green Wedge. Support • Leicestershire County Council: Supports clause 12.12 of the Green Infrastructure Strategy (2020), highlighting potential for community gardens, woodlands, orchards, and environmental education centres. • Charnwood Borough Council: Supports the Rothley Brook Meadow Green Wedge designation, aligning with their own Local Plan policies. • Site-Specific Support: Endorsement for retaining sites LPR49A and LPR49B as countryside within the Green Wedge. Objection

	• Policy Justification: Several representations argue that Green Wedge policy lacks strategic weight under the NPPF and duplicates Green Belt principles without justification. • Need for Review: Objections call for a reassessment of Green Wedge boundaries to allow development in areas that do not compromise policy objectives. • Limited Recreational/Ecological Value: IMP's appraisal notes that much of the Green Wedge is inaccessible, intensively farmed, and lacks significant ecological or recreational value. • Employment Park Proposal: IMP proposes that development (e.g. employment park) could enhance the Green Wedge through structured GI improvements, permissive paths, and biodiversity gains. • Planning Flexibility: Some argue that standard planning policies can achieve Green Wedge objectives without needing a specific designation.
NAT03: Trees, Hedgerows, Woodlands and Development	General Comment • Ecological Sensitivity: Tree planting schemes should be informed by ecological surveys. Avoid planting on habitats of local biodiversity value (e.g. species-rich grasslands), as outlined in the local Biodiversity Action Plan (BAP). • Net Zero & Tree Canopy Targets: Recognition of the role of tree planting in achieving net zero by 2050. The 20% tree canopy cover requirement for sites ≥0.5ha is noted, but concerns are raised about feasibility and impact on urban density. • Green Infrastructure Alternatives: If on-site tree planting isn't feasible, green roofs/walls are suggested as alternatives, though their cost implications are unclear. • Viability Assessment Missing: The absence of a Local Plan Viability Assessment is repeatedly flagged, raising concerns about whether the costs of tree planting and green infrastructure have been properly accounted for. Support • Supports protection of existing trees and hedgerows. • Recommends protection of watercourses to maintain natural water flow. • Suggests tree pits in urban areas to provide surface water attenuation benefits.

	Objection • Native Species Requirement: objects to the exclusive use of native species, arguing that non-native species may offer climate resilience and biodiversity benefits. Calls for either supporting evidence or revised wording. • Tree Sourcing & Ambition: Suggests specifying that trees should be locally sourced for better survival. Recommends a more ambitious replacement ratio than 3:1 due to poor canopy cover in the borough. • Policy Wording is overly protective: The phrase “wholly exceptional” is seen as inconsistent with NPPF Paragraph 180(c), which applies only to irreplaceable habitats. Suggests revising to “not normally permitted unless reasonably justified.” • Replacement Tree Ratio & Canopy Cover: The 3:1 replacement ratio is considered arbitrary and lacking evidence. The 20% canopy cover requirement in rural areas is questioned for its practicality and impact on usable open space and SUDs. Calls for case-by-case assessment of tree loss and replacement. • Canopy Cover Calculation & Tree Quality: Unclear how canopy cover will be calculated. Concern over how the 3:1 ratio aligns with canopy cover targets. Argues that low-quality trees should not be given equal weight.
NAT04: National Forest	General Comment • Policy Scope & Clarity: The policy is seen as vague and lacking a clear supporting evidence base. There’s uncertainty around how much weight can be given to the National Forest Company’s Guide for Developers and Planners, which is not formally adopted or independently scrutinised. • Strategic Integration: Suggests that the National Forest Strategy should be used as a material consideration in plan-making, not just decision-taking. Emphasis on embedding environmental enhancements into the Local Plan allocations, rather than relying solely on planning applications. • Green Infrastructure Vision: Outlines a green infrastructure strategy for an economic hub, including: On-site and off-site enhancements. Woodland planting. Improved connectivity via public rights of way and nature

	trails. This vision was shared with residents during public consultations in March 2022. Support • Welcomes recognition and support for the National Forest and Charnwood Forest Regional Park. Reserves the right to amend its position pending further evidence. • Considers NAT04 a sound policy. Welcomes changes made following Regulation 18 consultation. Notes success of previous Core Strategy policy in delivering forest creation. Suggests relocating references to the National Forest Design Guide: Sustainable Tourism Accommodation to Policy CLT03. • Fully supports the approach to protecting and enhancing the National Forest. Finds the policy justified and consistent with national policy, particularly NPPF paragraph 146. Endorses development management principles as a suitable framework for decision-making. Objection • Questions the reliance on the National Forest Company's Guide, arguing it is only guidance and not formally adopted. States it is inappropriate for such a document to form the basis of a firm policy requirement. • Criticises the policy for being extremely vague and lacking a supporting evidence base.
NAT05: Charnwood Forest Regional Park	General Comment • Policy Scope & Evidence Base: The policy sets out criteria for development proposals within the Charnwood Forest Regional Park. However, concerns are raised about the lack of a robust evidence base to justify the policy wording. • Reference to National Forest Planting Guidelines: The policy refers to these guidelines, but the representation suggests this reference is too vague and lacks clarity on how it should be applied. Support • Welcomes the recognition and support for both the National Forest and Charnwood Forest Regional Park within Policy NAT05.

	- Reserves the right to amend their position should further evidence come to light, indicating a flexible and evidence-led approach. Objection - Questions the appropriateness of the evidence base underpinning Policy NAT05. - Argues that the policy wording is too vague, particularly in its reference to the National Forest Planting Guidelines. - Suggests that without clearer justification, the policy may not be effective or sound.
NAT07: Protecting Biodiversity	General Comment The wording around irreplaceable habitats in Policy NAT07 may need revision. Defra is expected to publish guidance on what constitutes irreplaceable habitat for Biodiversity Net Gain (BNG), which may differ from local interpretations. It is suggested that the policy be amended to reflect forthcoming national guidance.
NAT08: Enhancing Biodiversity and Habitat Connectivity	General Comment - Alignment with DEFRA Consultation: - The statement in NAT08 that “BNG should be additional to any habitat creation required to mitigate or compensate for impacts on protected species” is not aligned with the latest DEFRA consultation. - DEFRA indicates that mitigation habitats may count towards BNG under certain conditions. - If this is adopted in secondary legislation, the Local Plan policy would be in conflict with national law. - Policy Wording Suggestion: - BHL recommends the policy require biodiversity net gain “in accordance with national policy and legislation” to ensure it remains up-to-date and sound. - This would future-proof the policy against changes in national requirements (e.g. if BNG increases beyond 10%). Support - Supports the principles of Policy NAT08.

	• Encourages the use of SuDS (Sustainable Drainage Systems) within biodiversity enhancements to achieve multiple benefits. • This support is repeated elsewhere in the document. Objection • Policy is considered unsound due to: Lack of clarity on off-site mitigation options. No transitional arrangements in line with the Environment Act 2021. Absence of costing for biodiversity credits in the Viability Study. • Policy should exempt reserved matters or approvals before a specified date. Without this, the policy may be inconsistent with the Environment Act. • Cost of Biodiversity Units: Council must establish local costs and include them in the Viability Study. Without this, the policy may threaten site viability and compromise delivery. • Definition of Development: Policy applies to “all development” but lacks clarity. Questions whether minor works (e.g. house extensions) are included. Calls for clearer thresholds and justification. • Legal Compliance: One objection notes the Environment Act provisions are now enacted, and the Plan should reflect this. Suggests including off-site credit purchase as a fallback for developers.
NAT09: Development in the Countryside and Settlement Separation	General Comment • Policy structure and planning balance: NAT09 is considered flawed because it defines “sustainable” development by reference to specific criteria, which is considered inconsistent with the NPPF. Sustainability should be determined through the planning balance, not pre-set criteria, a principle referred to in local appeal decisions. • Redundancy of Cross-Referencing Policies: The second part of NAT09 refers to other policies in the Plan, which is seen as unnecessary. All applications are already assessed against the Plan as a whole, making this reference duplicative. Green Wedge Example: If a proposal is in a Green Wedge, it will naturally be assessed against NAT02; NAT09 doesn’t need to restate this. • Housing Land Supply Context: Past decisions have shown that development in the countryside can be necessary to meet the 5-year housing land supply. The policy should

	acknowledge that lack of supply may justify countryside development. Support - No explicit support is expressed in the table. However, the general comments suggest a desire for policy refinement rather than outright rejection, which may imply conditional support for a revised version. Objection Additional Exception Criteria: Suggests adding a clause to support housing in sustainable edge-of-town countryside locations when the Council cannot demonstrate sufficient supply. Policy Overlap & Vagueness: One objection states that NAT09 is vague and overlaps with Policy HO08. Recommends that NAT09 be removed entirely due to lack of clarity and duplication.
NAT10: Landscape Character	Objection Outdated evidence base: the Landscape Sensitivity Study is from 2017 and does not reflect substantial landscape changes, including the construction of large-scale warehouses such as Amazon BHX7 and DPD UK Hub 5 at Hinckley Park. In particular, Area 09: Land South of M69 is considered outdated and does not account for recent built form. The representation therefore recommends removing the reference to this study from the policy. Inconsistency with national policy: the policy wording “conserve and enhance” is considered inconsistent with paragraph 174 of the NPPF, which expects policies to “protect and enhance valued landscapes... in a manner commensurate with their statutory status or identified quality in the development plan” and to recognise the intrinsic character and beauty of the countryside. - This inconsistency with national guidance should be addressed.
NAT11: Blue Infrastructure	General Comments Supports the general aims of Policy NAT11, especially its emphasis on enhancing blue infrastructure for biodiversity and recreation.

	• The policy's requirement for safe and convenient walking and cycling routes near canals or rivers is acknowledged positively. • A specific example is provided: the Hinckley West development (HIN02H) includes a pedestrian connection to the Ashby Canal, aligning with the policy's intent. • However, requests clarification that developers are only responsible for new blue infrastructure features, not existing ones like canals. • This clarification is necessary to ensure the policy is "clearly written and unambiguous", in line with NPPF paragraph 16d. Support • Support for Policy NAT11 and its alignment with the Water Framework Directive (WFD). Highlights ongoing work with the Environment Agency to improve watercourses. Emphasis is placed on the importance of protecting and enhancing natural drainage features and watercourses to support environmental and water supply needs. Objection • One comment states that the policy is vague, imprecise, and unclear, and requires amendment to be effective.
NAT12: Soils and Best and Most Versatile Agricultural Land	Objection • The policy is inconsistent with Paragraph 174 of the National Planning Policy Framework (NPPF). ◦ Paragraph 174 requires that planning policies and decisions recognize the economic and other benefits of the best and most versatile agricultural land. • The current policy goes beyond this by imposing additional requirements, which are not supported by national policy. • Therefore, it is recommended that the policy be removed.
PMD01: High Quality Design	General Comments • Nature and Wildlife Integration: CPRE suggests the policy should explicitly incorporate nature and wildlife into site design, including habitats and ecological networks. • SPD Reference Concerns: Concern that referencing the Hinckley and Bosworth Good Design Guide SPD in the

policy elevates it to development plan status. Suggests referencing it in supporting text instead.

- **Design Principles and Flexibility:** Support was expressed for the policy, but the need for flexibility in applying design principles was emphasised to avoid impacts on viability and deliverability.
- **Water Management:** Severn Trent recommends including water efficiency and the drainage hierarchy alongside SuDS for sustainable water management.
- **Site Constraints:** Suggestion to include a requirement that new development respects existing site constraints, including utilities.
- **Unclear Statements:** Some comments identify unclear wording or vague statements in the policy.
- **Positive Feedback on Natural Options:** A brief comment supports the inclusion of natural options.

Support

- **Viability Considerations:** Support was expressed for the policy, with a request that viability impacts be considered, referencing similar points made in relation to Policy CC05.

Objections

- **Unrealistic Standards:** Multiple objections were made to the phrase “highest standards” of design, arguing that it is subjective, unrealistic and inconsistent with the NPPF. It was suggested that this be replaced with “high quality”.
- **Imaginative Solutions:** Criticism of vague terms like “imaginative solutions” for parking and waste management. Requests clarification or examples.
- **Design Statement Requirement:** Objection to the requirement for a Design Statement for all developments. Suggests it duplicates national requirements and lacks clarity.
- **Tree-lined Streets:** Concern over the requirement for all new streets to be tree-lined, citing inconsistency with national policy and potential deliverability issues.
- **Policy Structure and Duplication:** Objection that PMD01 repeats other policies and includes vague criteria that may lead to subjective decision-making. Suggests moving elements to SPD.
- **Flexibility and Creativity:** Objection to limited flexibility in the policy, arguing it may stifle creativity and good design.

	• Climate Change Mitigation: Objection that the plan lacks evidence of contributing to climate change mitigation, especially given the allocation of greenfield land. • Agricultural Land Policy: Objection to a policy perceived as inconsistent with NPPF paragraph 174 regarding best and most versatile agricultural land. • Sustainable Settlement Growth: Suggestion that growth should be directed to the most sustainable settlements, with specific reference to Newbold Verdon.
PMD02: Active Design and Travel	General Comments • Economic and Social Value of Development: Developments that create jobs and contribute to levelling up in sustainable locations (e.g., Desford) should be given weight in transport assessments. • Support for Active Travel Principles: The Stoke Road site is highlighted as an opportunity to support active travel, aligning with PMD02 by encouraging walking and cycling to nearby facilities. • Pollution Prevention Role of Planning: Emphasizes the planning system's role in preventing pollution, particularly regarding water quality, ecological value, and drainage. Support • General Support for PMD02: CPRE Leicestershire supports the policy and its supporting text (paras 6.22-6.27), but suggests stronger emphasis on creating new links between urban areas and the countryside. • Green Routes Proposal: CPRE proposes adding a clause to the policy to support construction of high-quality green routes linking urban areas to the countryside, citing mental and physical health benefits. Objection • PRoW Realignment Flexibility: Suggests the policy should allow for realignment of Public Rights of Way (PRoW), provided they are retained, and seeks clarity on meeting the needs of "all users" year-round. • Use of Sports England Guidance: Objects to requiring compliance with Sports England's 'Active Design Principles' as it is non-statutory guidance and not formally adopted policy. • Applicability to Small Developments: Argues that small major developments (e.g., 10 dwellings) may not be able

	to meet Active Design Principles due to density and land efficiency constraints. Calls for flexibility.
PMD03: Preventing Pollution	General Comments • Role of Planning in Pollution Prevention: Acknowledges the planning system's role in preventing pollution, especially regarding water quality, ecological value, and drainage. • Obtrusive Light and LVIA Requirements: ○ BHL supports the principle of abating obtrusive light but raises concerns about the clarity of the policy. ○ Suggests the Light Zone map should be published before the plan's examination to ensure transparency and consistency with NPPF paragraph 16d. ○ Recommends including the map in the supporting text to aid interpretation. Support • Air Quality and Agricultural Development: Welcomes the policy but suggests the explanatory text should acknowledge air quality impacts from agricultural development/intensification. • Coal Authority Support Supports criteria (g) regarding land instability and paragraphs 6.28 and 6.46-6.48 for addressing coal mining legacy and associated risks. Objection • Evidence Base and Clarity: Objects to the lack of clarity and justification in the policy's requirements, especially regarding LVIA and light pollution. Cites NPPF paragraph 31, which requires policies to be underpinned by relevant and proportionate evidence. • Policy Wording and Consistency: ○ Criticizes the policy for being imprecise, onerous, and inconsistent with national policy. ○ Specific concerns include: ○ Part a) Should refer to mitigation and align with national policy on improving environmental conditions. ○ Part c) Overly burdensome and inconsistent with NPPF paragraph 185 on light pollution.

	○ Part d) Refers to tranquil areas without identifying them, contrary to NPPF guidance. ○ Part f) Lacks precision and evidence base. ○ Part h) Unclear and repetitive; inconsistent with national flood risk policy. • Mitigation Reference: Suggests the first paragraph should explicitly refer to mitigation to align with other parts of the policy (e.g., criteria h).
PMD05: Open Space, Sport and Recreation Facilities	General Comments • Clarification Request: A general query asking: “<i>What is POS?</i>” (likely referring to Public Open Space). • Flexibility in Policy Application: supports the policy’s intent but recommends flexibility: ○ Consider existing provision/surplus in the surrounding area. ○ Recognize that on-site provision may not always be feasible due to site constraints. ○ Explicitly allow for off-site contributions or quality improvements where on-site provision isn’t possible. ○ These changes would help ensure the policy is sound in terms of the NPPF. Support • Multifunctional Open Spaces: Severn Trent supports the policy’s approach to multifunctional open spaces. Recommends incorporating SuDS (Sustainable Drainage Systems) to enhance amenity and biodiversity. Suggests the policy should also support flood alleviation schemes. Objections • Outdated Evidence Base: Concern that the Open Space and Recreational Facilities Strategy (2016) is outdated and not robust per NPPF para 98. • Playing Pitch Strategy (2019) should be referenced in the policy, especially for playing fields. Playing fields should be assessed against the PPS, not the recreational study. • Use of Standards and Calculators: Sport England’s Pitch Demand Calculator is recommended for identifying demand from development. Standards are deemed inappropriate for assessing playing field provision.

	• Suggested Rewording of Policy ○ Proposed revision to clarify that development resulting in loss/reduction of open space or facilities will not be permitted unless justified. ○ Questions the necessity of referencing the local standards table in the POS study. • Supplementary Text Clarity: Requests clarification that if required open space is provided on-site, additional off-site contributions should not be sought.
PMD06: Indoor Sports Facilities	Support • Support for PMD06 Objections • A comment notes that the policy references potential contributions towards indoor sport facilities, but no Viability Appraisal has been prepared to support this requirement. The commenter requests the opportunity to review and provide further comments once the appraisal is published.
PMD07: Health and Well-being	General Comment • Alignment with County-wide HIA Procedure : Suggestion to add a statement that “Leicestershire County Council are working to establish a standard Health Impact Assessment (HIA) procedure for Leicestershire around health considerations in planning which HBBC will align with.” Support • Two entries simply state “PMD07 supported” without further elaboration. Objections • Requirement for HIA Goes Beyond NPPF: Jelson objects to the requirement for a Health Impact Assessment (HIA) for major developments, arguing there is no basis in the NPPF for this and that the policy exceeds national requirements. Suggests removing the policy or raising the threshold to developments over 100 dwellings. • Unclear Definition of ‘Fit for Purpose’ HIA: Gladman objects to the lack of clarity around what constitutes a “fit for purpose” HIA. Notes that the policy and supporting text do not effectively explain this, making it unclear for decision makers, developers, and the community.

	Recommends removing this requirement unless clearer wording and justification are provided.
PMD08: Recycling and Refuse Storage	General Comments • Design Integration and Practicality: New developments and conversions should include adequate internal storage to reduce premature disposal, home composting facilities, and sufficient space for segregated waste collection. Storage should be secure, convenient for occupiers and collectors, and minimize street scene impact. Where bins are stored at the front, screening should be provided. Concern raised about how this can be achieved given recent developer trends to reduce space to fit more properties. • Typographical Error: Noted missing word in the last sentence: “facilities to provided” should be corrected to “facilities to be provided”. • Policy Linkage: PMD08 does not reference or align with the Leicestershire Minerals and Waste Local Plan, which could be important for consistency and strategic planning. Objections • Lack of Clarity and Detail: Jelson objects to the vagueness of the policy, stating it lacks clear standards for “adequate internal storage” and does not define when home composting is appropriate. • Supporting Text as Policy: Objection to supporting text introducing additional policy “tests” not backed by national guidance. Argues these should not be embedded in supporting text and exceed national requirements.
SS01: Sustainable Development	General Comments • Duplication of National Policy (NPPF): Multiple comments argue that Policy SS01 unnecessarily repeats the National Planning Policy Framework (NPPF), particularly paragraph 11 and 16f, which advise against duplication in Local Plans. • Risk of Inconsistency: Repeating national policy may lead to inconsistencies, especially if the NPPF is amended post-adoption, causing interpretation and weighting issues between local and national policy. • Wording Concerns: The use of “normally be supported” instead of “should be granted” is seen as a departure from

	the NPPF's language, potentially weakening the policy's alignment with national guidance. • Material Considerations Reference: Reference to material considerations in SS01 is viewed as unnecessary, since they are already covered in the planning balance under paragraph 11.d.ii of the NPPF. • Policy Modification Suggestions: One comment suggests modifying SS01 to require proposals to demonstrate compliance with other relevant policies (e.g., CC01, PMD01, PMD02, HT01) if exceptions a. and b. do not apply. Objections • Policy Should Be Deleted: Numerous objections call for the deletion of SS01, arguing it serves no purpose beyond what is already covered in national policy. • Non-Compliance with Planning Legislation: One objection states the plan fails to demonstrate how it contributes to climate change mitigation, making it non-compliant with Section 19(1A) of the Planning and Compulsory Purchase Act 2004. • Greenfield Development Concerns: Objection to the allocation of greenfield land, citing carbon generation and increased travel without clear mitigation strategies.
SS02: Development Strategy	General Comments • Employment Land Provision: Policy SS02 sets a minimum of 105.95 hectares of employment land, but concerns are raised about the soundness of relying solely on existing allocations and commitments. • Sustainable Urban Extensions (SUEs): The Earl Shilton SUE has not received planning permission, and the Barwell SUE has not signed a S106 agreement despite a 2013 resolution. These delays cast doubt on their delivery within the plan period. • Housing Delivery Test Action Plan (2021): Indicates that the SUEs will not contribute to housing supply in the next five years due to unresolved issues. • Phasing of Employment Land: Employment elements of the SUEs are expected to be delivered late in the developments, which are residential-led. This puts 10.7 hectares (25%) of allocated employment land at risk. • Evidence Base Limitations: The Employment Land and Premises Study (2020) shows sufficient land to meet

	needs up to 2036, but the plan runs to 2039, leaving a gap in evidence. • Need for Flexibility: The policy lacks flexibility to respond to changing circumstances or increased employment land needs. • Opportunity for Strategic Development: The Council's evidence suggests potential for a substantial site with critical mass and visibility, offering modern, flexible, high-specification space. Support • Strategic Employment Development: Support implied for planning employment development with critical mass and visibility, aligning with the consultation's emphasis on attractive, flexible workspaces. Objections • Unsound Policy Approach: The reliance on undelivered SUEs is considered unsound and unjustified. • Inflexibility of SS02: The policy does not provide sufficient flexibility to accommodate changing employment needs or alternative delivery options. • Unrealistic Delivery Expectations: Counting undelivered employment land within the plan period is seen as unrealistic and undermines the robustness of the strategy. • Evidence Gap to 2039: Lack of employment land need evidence beyond 2036 raises concerns about the policy's justification and long-term viability.
SS03: Local Plan Review	General Comments • Consultation Process Concerns: The respondent believes the Local Plan was not developed with proper consultation, especially regarding Leicester City's unmet housing need. • Review Policy Limitations: Criticism of reliance on a review mechanism (as used unsuccessfully in North West Leicestershire's 2017 Local Plan) to address unmet need. Seen as unresponsive and ineffective. • Statement of Common Ground Dependency: Concern that Policy SS03's effectiveness is undermined by its reliance on an agreed Statement of Common Ground, which may not be reached and is negotiated outside the public domain.

	• Spatial Relationship with Leicester City: Acknowledges Hinckley and Bosworth's spatial relationship with Leicester City and the growth directed to the city boundary, suggesting this warrants stronger measures in the Local Plan. • Evidence Conflict: Notes a contradiction between the Local Plan's statement that Leicester's unmet need is unquantified and the March 2021 Statement of Common Ground, which identifies over 16,500 dwellings of unmet need. Objections • Policy SS03 Not Supported: The policy is explicitly not supported due to its perceived ineffectiveness and lack of immediate action to address Leicester's unmet housing need. • Premature Submission of Local Plan: Objection to HBBC submitting its Local Plan before the apportionment of Leicester's unmet need is known. Suggests a short delay (4 months) would allow incorporation of new evidence. • Need for Immediate Action: Recommends either increasing the housing requirement by 15-20% above the base Local Housing Need or allocating reserve sites to be released immediately if unmet need is apportioned to HBBC. • Review Mechanism Critique: Argues that relying on triggers for review is insufficient and that a full review should be undertaken upon adoption, especially since the unmet need distribution will be known by February 2023.
SS04: Strategy for Hinckley	General Comments • Strategic Road Network Focus: Concern that both policies focus heavily on improving the strategic road network without mentioning active or sustainable transport. This emphasis may undermine the soundness of the policies, especially given the Plan's broader goals around climate change and reducing car dependence. • Support for Hinckley's Role: BHL supports Hinckley's role as a sub-regional centre and sustainable growth location. They argue that development west of Hinckley (LPR31) aligns well with SS04, offering high-quality housing, community facilities, and public open space. • Repeated Support for Hinckley Strategy: The same general support for SS04 and the LPR31 site is repeated

	twice, emphasizing its contribution to sustainable growth and alignment with the town's character and landscape. Support • Strategic Road Improvements in Burbage: Support for SS04's reference to improving the strategic road network around the A5 and M69 corridors in Burbage. • Normandy Way Allocation: Support for SS04's strategy for Hinckley, with specific endorsement of additional land allocation north of Normandy Way, which is seen as consistent with the policy's aspirations. This support is repeated twice. Objections • Unclear Public Realm Masterplan: Objection to the lack of clarity around the "new Public Realm Masterplan" mentioned in SS04. It's unclear whether it's a new document or a continuation of the 2020 strategy. Hansom Court is proposed as a regeneration opportunity, and the representation argues it should not be defined as Secondary Shopping Frontage. • Insufficient Transport Evidence: Objection to SS04 and SS05 due to limited transport evidence. The strategies are seen as premature without clear identification of impacts and mitigation measures needed to support strategic infrastructure.
SS05: Strategy for Burbage	Objection • The objection focuses on the lack of transport evidence to assess the suitability of the strategies. • Specifically, there is a need for evidence showing the likely impact, scale of mitigation, and deliverability of strategic infrastructure improvements.
SS06: Barwell Sustainable Urban Extension	General Comments • Outdoor Sports Provision ○ The policy references outdoor sports provision but lacks clarity on what will be provided on-site versus off-site. ○ Suggests using the Playing Pitch Strategy and Facilities Framework as evidence for what is needed.

- Notes the original S106 agreement included a contribution to the replacement Hinckley Swimming Pool.
- Recommends assessing:
 1. Can existing facilities meet demand?
 2. Can investment in existing facilities help?
 3. What must be provided on-site?
- **Delivery Concerns**
 - Concern that Barwell and Earl Shilton SUEs will not be completed within the Plan period.
 - Argues this is an unsound approach that could lead to development on other greenfield sites.
 - Calls for improved delivery targets and stronger justification in the Plan.
- **Transport Infrastructure Ambiguity**
 - Policies SS06 and SS07 refer to Policy 16 in the Area Action Plan, which includes a £27.2m contribution to the A5 Dodwells scheme.
 - Criticism that the road scheme is unspecified and lacks clarity on its purpose and scope.

Objections

- **Over-Reliance on Undelivered SUEs**
 - The Council continues to rely on Barwell and Earl Shilton SUEs for 22-24% of housing provision, despite no delivery to date.
 - No up-to-date evidence base is provided to support continued allocation or delivery trajectory.
 - Boundaries of the SUEs are not shown on the Policies Map.
- **Planning Permission and Delays**
 - Barwell SUE outline application (submitted in 2012) remains undetermined.
 - Earl Shilton application only submitted in 2022.
 - Delivery now expected from 2028/29, 15-20 years after original identification.
- **Viability and Affordable Housing Issues**
 - Disputes over affordable housing provision are delaying progress.

	○ Barwell proposes only 10% affordable housing; Earl Shilton up to 20%, subject to viability. ○ Both fall short of the 20% requirement in strategic policies. • Unsoundness and Lack of Evidence ○ The Plan lacks evidence to demonstrate the SUEs are developable or will meet policy requirements. ○ Employment Land and Premises Study (2020) raises concerns about viability and deliverability. ○ Suggests pushing delivery back to 2031/32 and reducing projected dwellings: 1. Barwell: 607 dwellings 2. Earl Shilton: 858 dwellings • Alternative Site Promotion ○ Recommends considering other sites such as Land at Soar Brook, which is seen as more viable and capable of delivering affordable housing.
SS07: Earl Shilton Sustainable Urban Extension	General Comments • Policy SS07 vs SS06: There is a concern that Policy SS07 addresses issues that are also relevant to Policy SS06, specifically section d(ii). It is suggested that these points should be explicitly repeated in SS06 unless "recreation" does not include sports facilities. If sports facilities are excluded, then the earlier comments regarding their omission apply. Support • Earl Shilton SUE Re-allocation: BHL expresses support for the re-allocation of the Earl Shilton Sustainable Urban Extension (SUE), citing the site's suitability and deliverability. A recent planning application for 1,000 dwellings is presented as evidence of imminent delivery, reinforcing the view that the policy is sound. Objection • Lack of Transport Evidence: Objections are raised against Policies SS07, HT01, HT04, and INF01 due to the absence of a Strategic Transport Assessment and Infrastructure Delivery Plan accompanying the Regulation 19 document. This lack of evidence undermines the justification for proposed allocations.

	• Outdated Planning Documents: The Earl Shilton and Barwell Area Action Plan (AAP) from 2014 and the Strategic Transport Assessment from 2013 are considered outdated. Updates are needed, especially to infrastructure details like Table 2 in the AAP. • Unresolved Transport Modelling: The strategic modelling for the Earl Shilton SUE is still in early stages, with key elements (e.g., committed development, highway infrastructure, forecast scenarios) not yet agreed upon with National Highways or Leicestershire County Council. Similarly, Barwell SUE is undergoing revised modelling, and its original Transport Assessment (2012) is outdated and tied to an expired outline consent. • Unsound Plan Justification: Due to the lack of updated transport evidence and unresolved infrastructure planning, the policies and proposals are deemed not adequately justified and therefore not soundly based.
SS08: Strategy for the Key Rural Centres	General Comments • Support for Policy SS08's Intent: Multiple respondents support the overall aim of Policy SS08 to guide development in Key Rural Centres (KRCs), recognising their role in providing local services and acting as focal points for surrounding rural areas. • Concerns about Groby's Sustainability: BHL and others argue that the strategy fails to support Groby's long-term sustainability due to the lack of new housing allocations, despite its capacity and sustainable links to Leicester. They suggest the plan is not positively prepared or justified. • Omission of Leicester Relationship: The relationship between Groby and Leicester, including Leicester's unmet housing need, is not acknowledged in the reviewed Local Plan, despite being recognised in the adopted Core Strategy. • Neighbourhood Planning: IMP highlights Groby Parish Council's progress in developing a neighbourhood plan and stresses the importance of HBBC supporting this process to align with strategic objectives. • Green Wedge Concerns: IMP notes local concerns about protecting the Rothley Brook Meadows Green Wedge. While their proposed employment park would reduce its size, they argue it would maintain quality through green infrastructure standards.

	- Transport and Climate Change: One comment criticises the emphasis on road network improvements in policies, calling for stronger references to active and sustainable travel and climate change mitigation. Support - Sustainable Growth Locations: Several comments support Policy SS08 for identifying KRCs such as Stoke Golding and Markfield as sustainable locations for growth, including housing, employment, retail, leisure, and community facilities. - Alignment with Local and National Objectives: IMP supports the policy's ambition to enhance and retain the role of KRCs like Groby, aligning with economic growth goals and neighbourhood planning principles. Objection - Unspecified Objection: One entry is marked as an objection but does not provide any stated reason or detail.
SS09: Strategy for the Rural Villages	General Comments - Policy SS09 Overview: The policy aims to support the role of Rural Villages in providing localised services and acting as community focal points. - Criteria Alignment: The criteria set out in SS09 are generally supported as they reflect the evidence base and promote sustainable development, vitality, and viability of rural services and facilities. Support - Neighbourhood Plan Alignment: The Neighbourhood Plan supports small-scale, sustainable businesses including home-based working (Policies BE1 & BE2). - Cautious Welcome for SS09: There is cautious support for SS09's strategy for Rural Villages, particularly its recognition and support for policy statements within local Neighbourhood Plans.
SS10: Strategy for the Rural Hamlets	General Comments Community-Led Development: Emphasis on ensuring that neighbourhood plans and parish plans are fully supported and considered in future reviews. The strategy should prioritise community-led development and regeneration.

	• Terminology Suggestion: A recommendation to replace the term “Rural Villages” with “Rural Hamlets” to better reflect the scale and nature of the settlements being referred to. • Policy Wording Concerns: ○ The wording of Policy SS10 is considered too similar to SS09, which may cause confusion. ○ Clarification is needed that hamlets are not being directly allocated housing. ○ Specific elements of the policy (e.g., reference to “townscape” and “retail”) are seen as inappropriate for hamlets, which typically lack such features or facilities.
TDC01: Town, District, Local and Neighbourhood Centres	Objection • Hansom Court Frontage: The secondary shopping frontage designation for Hansom Court is considered no longer achievable and should be removed in future Local Plan iterations. • Residential Development: It is suggested that residential development on the Hansom Court site would be more appropriate, aligning with Planning Practice Guidance to support town centre vitality. • Missing Evidence: Several key documents and evidence are missing, including: ○ Retail frontages evidence ○ Policies Map showing secondary frontages ○ Updated Town Centre Strategy and Masterplan ○ Reviews of town and district centres and neighbourhood centres • Policy Gaps: The Plan lacks criteria to support redevelopment of long-vacant units (vacant for over 6 months), as referenced in paragraph 9.7.
TDC02: Sequential and Impact Tests	General Comments • Policy TDC02: There is a general comment noting the absence of reference to a Health Impact Assessment (HIA) under this policy.
TDC03: Hot Food Takeaways and Betting Offices	Support • Severn Trent Water supports limiting the concentration of Hot Food Takeaways (HFTs) in one location due to:

- The risk of Fats, Oils, and Grease (FOG) entering the sewerage system, causing blockages.
- The importance of installing FOG interceptors in such premises.
- A general endorsement of policies that prevent clustering of these types of businesses.

Objection

- **Evidence and Justification:** Lack of local evidence showing high or increasing obesity rates. Absence of spatial analysis to assess the impact of exclusion zones. No assessment of the number of HFTs affected or the social, economic, and environmental impacts. Surveys cited do not include calorific content, energy density, or types of premises. The policy is not based on objectively assessed development requirements. Effectiveness and Practicality: Doubts about the effectiveness of banning HFTs within 400m of schools. Physical barriers (e.g., rivers, canals) make radius-based exclusion zones impractical. Monitoring and enforcement of over-proliferation is unclear. No mechanism for policy adjustment if objectives are not met.
- **Planning Policy Compliance:** The policy may not comply with NPPF paragraphs 16(d), 35(b) and PPG part 53. NPPF promotes creating choice, not restricting it. Planning system is ineffective at distinguishing between healthy and unhealthy food outlets.
- **Economic and Social Impact:** Risk of loss of convenience stores and increased car journeys due to HFT restrictions. Experiential uses like HFTs help maintain footfall for other shops. Blanket bans may disincentivize healthy food offerings by HFTs.
- **Research and Data Limitations:** Studies (e.g., Williams et al. 2004, 2014) show inconsistent findings on food environments. Difficulty in mapping actual land uses to research premises. Weak evidence linking proximity of HFTs to schools with obesity.
- **Policy Clarity:** No definition of over-proliferation or how it will be measured. Unclear how effectiveness of the policy will be evaluated.
- **Comparative Policy Context:** Similar policies elsewhere were adopted under more severe conditions (e.g., high obesity rates). In those cases, limited objections were received.

Table 3: Main issues raised on settlements

Settlement	Main Issues Raised
Bagworth	• Lack of awareness and late notice of the consultation period. • Parish Council's submitted development proposals appear to have been ignored. • Concerns about inclusion of sites previously refused planning permission. • Proposed housing increase in Thornton considered unsustainable. • Suggestion to combine sites for a more sustainable and policy-compliant development. • Objection to current allocations not meeting local housing needs, especially affordable housing. • Proposal to allocate additional land (e.g. off Murphy Drive and Chestnut Drive) to meet specific housing needs. • Objection to removal of land from settlement boundary without notification. • Concerns about inconsistencies and contradictions in the Local Plan, especially regarding land use designation and compliance.
Barlestone	• Concerns about infrastructure capacity in rural centres. • Suggests that allocations in rural centres like Barlestone may negatively impact infrastructure.
Barwell	• Concerns about over-reliance on strategic sites (Barwell SUE) for housing delivery. • Historical delays in planning applications and unresolved objections from Highways England. • Questions about the viability and realistic delivery of 990 homes.

	• Suggests a more conservative housing trajectory and redistribution to sustainable rural areas.
Burbage	• Support for the Local Plan's vision and environmental objectives. • Requests clarification on the planning status of allocated sites near Sapcote Road. • Suggests clearer policy wording and more transparency in site selection. • Concern about the lack of affordable housing delivery and the need for additional allocations. • Hinckley sewage works rationalisation will release only 11 hectares for employment use, not the 30 hectares indicated in the draft plan.
Congerstone	• Concern about flood risk: site CON01H includes areas in Flood Zone 3. • Environment Agency notes the need for further comments on this allocation due to proximity to flood zones.
Desford	• Objection to the draft Local Plan for not providing a housing requirement for neighbourhood plans. • Objection to showing reserve sites from the Desford Neighbourhood Plan as commitments. • Concern that the Local Plan does not meet accessibility regulations. • Objection to the lack of a Sustainability Appraisal and other supporting documents. • Suggests that the Local Plan should not be submitted until these issues are addressed.
Earl Shilton	• Similar concerns to Barwell regarding reliance on strategic urban extensions. • Delays in planning application validation and delivery. • Questions about the realistic delivery of 1,000 homes.

	• Suggests redistribution of housing to rural areas with better infrastructure capacity.
	• Objection to proposed sites between Groby and Ansty (LPR49A and LPR49B), requesting they remain farmland/green wedge. • Sites are close to Sheet Hedges Wood (a Site of Special Scientific Interest); development could harm its protected status and wildlife. • Emphasis on prioritising local food production. • Groby is already at amber level for traffic-related air pollution; further development could push it to red. • Road network cannot support large-scale development; concerns about congestion and safety. • Fear that allocations and other developments will change the village's character.
Hinckley	• Support for the Local Plan's intention to address development pressures. • Support for the vision and objectives, including environmental and economic goals. • Concern about the lack of clarity in the vision statement regarding urban area definition. • Suggests clearer reference to Hinckley, Burbage, Barwell, and Earl Shilton in the vision. • Objection to the lack of transport evidence and infrastructure delivery planning. • Concern about the delay in delivery of Hinckley West and its impact on housing supply.
Markfield	• Objection to the lack of allocations despite high sustainability score. • Concern about the ability to meet affordable housing needs. • Suggests that Markfield should accommodate more growth due to its size and connectivity.

		• Objection to the lack of Sustainability Appraisal and site selection transparency.
Market Bosworth		• Objection to the consultation process and lack of engagement with the Parish Council. • Concern about strategic changes between Regulation 18 and Regulation 19 versions. • Objection to the housing allocation of 243 homes, which is considered disproportionate. • Suggests that the Neighbourhood Plan update and community engagement have been ignored.
Nailstone		• Objection to Nailstone being classified as a Rural Hamlet. • Argues it should be a Rural Village due to proximity to major employment site (Nailstone Colliery). • Highlights local facilities including a primary school, pub (under refurbishment), and community spaces. • Suggests a small housing allocation would support local services and employment.
Newbold Verdon		• Objection to the proposed allocation NEW01H (Brascote Lane) for 221 dwellings. • Concerns about lack of Sustainability Appraisal and site selection transparency. • Suggests alternative sites (e.g. LPR98C) are more suitable and deliverable. • Questions the robustness of the site selection process.
Norton Twycross	Juxta	• Settlement boundary query
Ratby		• Suggests Ratby should receive more housing due to its size, connectivity, and employment potential. • Highlights significant affordable housing need in the area. • Concern that current allocations do not reflect the settlement's capacity or needs.

Stoke Golding	• Objection to the lack of Sustainability Appraisal and Appropriate Assessment. • Concern about the impact of development on infrastructure and services. • Suggests that the Local Plan is not legally compliant and should be reconsulted. • Proposed site for 210 dwellings plus existing applications will strain local primary school capacity. A new school would require at least 700 dwellings; nearest alternatives (Grobby, Kirby Muxloe) are not ideal.
Thornton	• Objection to proposed housing allocation due to traffic and parking concerns. • Concern about loss of countryside and natural habitat. • Suggests that amenities and infrastructure are insufficient to support additional housing.
Twycross	• HBBC should strictly maintain settlement boundaries to prevent development in unsustainable locations. • The Local Plan should better recognize the role of British farming in biodiversity, carbon reduction, and food production. • Requests evidence of public consultation supporting new settlements and urges early engagement with affected communities. • Emphasises that all development must include adequate infrastructure for power, water, highways, and telecommunications. • Welcomes the draft Local Plan to 2039 and supports its development hierarchy. • Supports the Local Plan's backing for Twycross Zoo as an internationally significant facility.
Witherley	• Highlights that Witherley has more facilities than Congerstone yet is not allocated any development.

- Notes Environment Agency's report on flood mitigation and suggests local action since flooding is limited.

Table 4: Main issues raised on supporting text

Section of document	Main Issues Raised
Chapter 1	1.12: Need to update the LP now Stoke Golding's NDP has been made, probably Barlestone will also need to be added. 1.16: The Local Plan (LP) needs updating to reflect the adoption of Stoke Golding's Neighbourhood Development Plan (NDP), and likely Barlestone's NDP should also be incorporated.
Chapter 2	2.12: Witherley Parish is 92% agricultural land; the Local Plan should reflect the true proportion of agricultural land in the Borough, as the rural setting is a key reason people choose to live there. 2.14: Witherley Parish is 92% agriculture land, I think the figure of 2.3% is mis-leading, the percentage of land within the Borough used for agricultural purposes should be reflected here. The rural setting is one of the main reasons people chose to live within the Borough. 2.17: Should any planning application for Earl Shilton Ward take into special consideration the need for providing the opportunity for day-to-day activities.
Chapter 3	3.2: the Corporate Plan is out of date, should read 2022-2025. 3.4: Community Plan should have a date 3.6: The Rural Strategy is from 2022-2024 and there are five priority themes. (only agreed 21-01-2022) Environmental Objective 7 is considered inconsistent with the National Planning Policy Framework (NPPF) because it does not include adaptation to climate change. The objective should be clarified and rewritten to ensure compliance with NPPF requirements. While the vision to focus development on urban areas is supported, it lacks clarity and should explicitly reference Hinckley,

	Burbage, Barwell, and Earl Shilton. Economic Objective 11 should include both deliverable and developable sites.
Chapter 4	4.1: LCC had a 101% as opposed to HBBC at 86%, why are LCC declaring an unmet housing need now? 4.19: Delete reference to next iteration of the draft plan. 4.23: disagrees the current LP reflects the current NDP allocations 4.5: there are only 4 distinct potential spatial strategies listed 4.6: The Submission version of the Local Plan includes a paragraph setting out the Council's view that new settlements should be considered as a key direction for future long term managed strategic growth in the borough. It states that work is underway to review options for new settlements and that this could form part of a future revision of the Local Plan or other development plan documents. It is not clear what the purpose of this paragraph is and how it relates to the development strategy proposed. It is also not clear how it relates to the process of testing alternative options due to the absence of the Sustainability Appraisal in the list of consultation documents. This paragraph should be deleted or needs to be clarified to explain its purpose. 4.7: The emerging Plan advises at paragraph 4.7 that the local housing need for the Plan period is 8,436 dwellings, the equivalent of 444 dwellings per annum. This is based upon the provisions of the Standard Method. This conclusion is, however, flawed and not supported by robust evidence. Paragraph 61 of the Framework advises that in order to determine the "minimum" number of homes needed strategic policy should be informed by a local housing needs assessment conducted using the Standard Method. Suggested Modifications: A significant uplift to the housing requirement is required to take account of a pressing need for affordable housing in the Borough. There should be an allowance for the growth of Leicester City included within this version of the Plan.

Respondents strongly disagree with the Council's conclusion that the standard method housing figure is sufficient. They argue that the significant demand for affordable housing in Hinckley and Bosworth justifies a substantial uplift to the housing requirement. Additionally, they contend that the Plan should include an allowance for Leicester City's unmet housing need, rather than deferring this to future revisions. The current approach is seen as failing to reflect the scale of local and regional housing pressures. Suggested Modifications: Increase the overall housing requirement to address affordable housing needs. Include provision for Leicester City's unmet housing need within this version of the Plan.

4.9: Respondents challenge the assertion in paragraph 4.9 that affordable housing need is already accounted for in the standard method figure. They argue that while affordable housing is a component of local housing need, the Plan fails to deliver the required level of affordable housing. They contend that this interpretation contradicts national policy and guidance, which allows for an uplift in housing numbers where justified by local needs. The current approach is seen as inadequate and risks under-provision of affordable homes. Suggested Modifications Apply a significant uplift to the housing requirement to reflect the pressing need for affordable housing. Include provision for Leicester City's unmet housing need within this version of the Plan.

4.10: Acknowledges Leicester City's unmet housing and employment needs and welcomes the preparation of a Statement of Common Ground to set out the proposed distribution of this unmet need.

4.16: The plan provides land for 9,124 homes by 2039, which is only 7.5% above the identified need. It is suggested that a larger contingency, at least 10% should be included to allow for flexibility and unforeseen circumstances.

4.19: Welcomes reference to the strategic distribution needs study and the upcoming Leicestershire wide employment land

	study is welcomed as is the commitment to consider the latest evidence on employment land needs in the next Local Plan.
Chapter 5	5.18: it should be a requirement that all minor developments have sustainable drainage systems for the management of runoff. If a developer puts in 3 minor phased developments to avoid S106 then the final development will be major and there will be significant runoff. 5.23: Witherley Parish Household Survey, as part of NDP, identified the parishioners preferred solar panels to wind turbines. Solar panels may not be the governments first choice but it is up to HBBC to provide opportunities for all forms of renewable energy options. Solar panels, ground source heat pumps etc should all be mentioned as viable options. The landscape of the Borough is noticeable fairly level and a wind farm would be visible from many locations. Are HBBC prepared to accept all sizes of wind turbine blades? 5.5: The respondent requests the removal of Witherley from the referenced paragraph, arguing that the Witherley Impact Assessment (Environment Agency, July 2019) has not been adequately considered in the Local Plan. The assessment outlines upstream watercourse adaptations to reduce flood risk in the village. It is suggested that this document be explicitly referenced in the Plan as a model for other areas. The respondent also recommends that natural flood defences (e.g. dams, tree planting) be incorporated into Witherley's Neighbourhood Development Plan (NDP) and relevant Local Plan policies. Additionally, the presence of historic sluice gates is noted as a potential means for landowners to manage water flow and enhance field productivity and biodiversity. General Locational Strategy: The Local Plan focuses development in urban areas and proportionate growth in rural settlements, but representors argue Desford should be prioritized as a key rural settlement due to its significant employment zones and potential for sustainable growth.

	Climate Change Commitment: The Plan fails to demonstrate how it will mitigate climate change, lacks proactive measures, and does not justify its approach to transport and development patterns. Current policies are seen as “business as usual” and ineffective. Legal Compliance: The Plan does not comply with Section 19(1A) of the Planning and Compulsory Purchase Act 2004, as it fails to show how development will contribute to climate change mitigation and adaptation. New Settlements Paragraph: The inclusion of a paragraph about future new settlements is unclear and unjustified, especially without a Sustainability Appraisal. It should either be clarified or removed. Target date for carbon neutrality remains 2050, missing an opportunity to align with the County’s 2045 target. Energy capacity study is outdated (2014) and does not reflect future needs.
Chapter 6	6.39: should a regulation/law/guidelines be included to ensure minimum standards? 6.42: Severn Trent supports the need to protect groundwater, especially in areas where it is used for drinking water supply. Contamination of these sources could cause significant issues for potable water provision. 6.58: Criteria 4b queries
Chapter 7	7.33: Respondents highlight a significant mismatch between the identified affordable housing need—271 dwellings per annum (61% of the total requirement)—and the delivery proposed in Policy HO9, which sets lower targets due to viability constraints (25% on qualifying sites, 20% for SUEs, and 40% in rural areas). They argue this shortfall undermines the Plan’s alignment with the social objective of sustainable development (NPPF paragraph 8.b) and its duty to make “sufficient provision” for affordable housing (NPPF paragraph 20.a). To address this, they propose a

	substantial uplift to the overall housing requirement, which would proportionately increase affordable housing delivery. Affordable Housing: The approach is inconsistent with Planning Practice Guidance. The Plan should consider increasing the housing requirement to help deliver affordable homes. Without an uplift in housing numbers, the emerging Local Plan is not considered positively prepared under NPPF soundness tests. Planning Practice Guidance supports increasing total housing requirements where it helps deliver affordable homes.
Chapter 8	8.26: Respondents object to the statement in the draft Plan that no additional sites will be allocated for strategic distribution. They argue that this is presumptive and premature, given the unmet need for large-scale distribution uses across Leicester and Leicestershire. The Plan should remain flexible and responsive to emerging evidence and regional collaboration outcomes. General Housing Requirement & Economic Growth: The housing requirement should consider opportunities to support economic growth. Hinckley and Bosworth's strategic location and connectivity make it suitable for significant growth, which should be reflected in the Local Plan. Education Infrastructure: The draft plan lacks sufficient detail on education infrastructure needs, including housing mix, development timelines, and build trajectories. References to schools, SEND, and early years provision are minimal, undervaluing their role in sustainable communities. Employment Land Supply: There is concern over the lack of employment allocations to meet current demand for business units. This has led to lost economic opportunities. Mixed-use sites should be considered to reduce commuting and support sustainability. Support for Economic Prosperity Policies: The Economic Regeneration Team welcomes the Local Plan's focus on protecting existing employment sites and developing new ones,

	highlighting strategic sites like MIRA and the importance of skills development (Policy EP06).
Chapter 9	Libraries are omitted from the list of cultural and leisure uses and should be included.
Chapter 11	11.30: incorrectly states that Historic England can provide a list of approved archaeological organisations. This reference should be removed because Historic England does not maintain such a list.
Chapter 12	Biodiversity Net Gain: DEFRA's latest proposals may render some policies outdated. Environmental Objective wording should be strengthened to align with national policy and ensure net biodiversity gains.
Chapter 13	13.23: Respondents highlight that the reference to the proposed widening of the A5 between the Dodwells and Longshoot roundabouts is outdated. The scheme was cancelled, as confirmed in the National Highways Delivery Plan Update (July 2021). They recommend that the paragraph be updated to reflect that the dualling of this section of the A5 is no longer being pursued through the Road Investment Strategy (RIS). Stakeholders are currently working to assess the implications of the scheme's cancellation on future growth and infrastructure planning. General No transport evidence base or Infrastructure Delivery Plan has been prepared. Current transport policies are generic, and cross-boundary collaboration is missing. Risks include inadequate mitigation for cumulative impacts.
Chapter 14	General Healthcare Impact: Any increase in residents will directly impact local NHS services (primary, hospital, community care). Developer contributions (e.g., S106) are needed to mitigate this impact. Viability and Infrastructure Evidence: The Local Plan lacks a whole-plan viability assessment and infrastructure assessment.

	Without these, the plan's deliverability cannot be confirmed. If produced later, further consultation would be required. Transport Evidence: No published transport modelling evidence is available. NPPF and PPG require robust transport assessments to address impacts on local and strategic road networks. Cross-boundary implications (e.g., A46/A50 junction) need collaborative planning. Healthcare Facilities Under Pressure: Significant growth in Barwell (2,500 homes) and Earl Shilton (1,600 homes) will strain local practices (Barwell & Hollycroft, Station View, Centre Surgery, Maples Family Practice). Groby Surgery also flagged as high-impact. Request for S106 Contributions: NHS seeks S106 contributions for all developments to expand primary care services and mitigate population growth impacts.
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Table 5: Main issues raised by topic

Topic Area	Main Issues Raised
Legal and Procedural Concerns	Accessibility Compliance: The draft Local Plan fails to meet the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018, with over 1,600 errors identified. Sustainability Appraisal (SA): The Plan was published without an up-to-date SA, breaching Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environmental Plans and Programmes Regulations 2004. Habitat Regulations Assessment (HRA): The HRA is outdated and has not been re-screened in light of new guidance, particularly regarding the River Mease SAC. Duty to Cooperate: The Plan lacks a published Duty to Cooperate Statement and relies on an outdated Statement of Common Ground (SoCG). A new SoCG is expected but not yet incorporated. The Plan lacks a Strategic Environmental Assessment, Sustainability Appraisal, and Habitats Regulation Assessment

	screening statement. Without these, the Plan cannot be legally compliant or sound. Concerns that these issues could render the plan legally non-compliant.
Gypsy and Traveller Provision	Cross-Boundary Coordination: Support for the commitment to a separate Gypsy and Traveller Site Allocation DPD, but emphasis placed on the need for timely and collaborative work across Leicestershire.
Strategic Growth and Cross-Boundary Needs	Leicester's Unmet Need: The Plan defers addressing Leicester City's unmet housing need to a future review (Policy SS03), which is seen as inadequate. Respondents call for immediate inclusion of an allowance in the current Plan.
Site Selection and Evidence Base	Heritage Assets: Concerns raised about the lack of site assessment information and the absence of a Site Selection Topic Paper. This undermines transparency and the ability to assess impacts on heritage assets. Sustainability Appraisal Consultation: The absence of a concurrent SA consultation makes it difficult to evaluate whether earlier concerns have been addressed.
Health and Wellbeing	NHS Support: The Leicester, Leicestershire and Rutland Clinical Commissioning Groups (LLR CCGs) support the Plan's vision and seek collaboration to improve population health outcomes. Key priorities include: Community cohesion and identity. Access to green space and recreational facilities. Design that promotes physical and mental wellbeing. Carbon reduction measures linked to health benefits.
Consultation Process	Insufficient Engagement: The Regulation 19 version is viewed as rushed, with inadequate consultation on key matters such as the settlement hierarchy, housing allocations, and strategic policies. These should have been addressed at Regulation 18 stage.
Housing Requirement and Neighbourhood Planning	Affordable Housing Need: The Plan's reliance on the Standard Method is challenged. Respondents argue that the significant shortfall in affordable housing delivery (271 dpa needed vs. ~21%

	historic delivery) justifies a substantial uplift in the housing requirement. Neighbourhood Plans: The Plan fails to provide a breakdown of housing requirements per parish, as required by paragraph 66 of the NPPF. This omission undermines the ability of Neighbourhood Plan groups to plan effectively. Desford Parish: The Plan incorrectly treats reserve sites in the Made Desford Neighbourhood Plan as commitments, despite their status and timing.
Employment Land & Economic Growth	The Borough Council supports addressing logistics needs through regional employment land studies and advises considering findings from Leicestershire and West Midlands studies. Wilson Bowden promotes land at West Hinckley for employment use. The Employment Land and Premises Study (ELPS) 2020 identifies the site as high priority. Criticism of the Local Plan for deferring strategic employment allocations. Support for development along the A5 corridor, aligning with the Strategic Growth Plan (SGP). Concerns that deferral will harm economic growth and investment.
Education provision	Generally less complex, but cross-district impacts could be significant. Example: new secondary school proposed at Stoney Stanton to reduce transport and environmental impact. Hinckley Academy redevelopment may reduce capacity. The draft plan lacks a clear strategy for delivering education needs arising from new housing. There is no detail on housing trajectories, land for schools, or funding mechanisms, particularly where multiple developers must contribute.
Biodiversity Net Gain	The Environment Act (2021) mandates 10% biodiversity net gain as a condition for planning permission.

	Policy NAT08 requires on-site biodiversity net gain first, then off-site or offsetting. This could reduce developable land and affect housing delivery. No local mechanism exists for biodiversity credits or financial contributions, creating risks of delays and uncertainty. Current housing density methodology does not account for land needed for biodiversity net gain, likely reducing site capacity and housing numbers. Concerns raised that the Local Plan may not be positively prepared or supported by proportionate evidence to achieve its development strategy.
Blue-Green Infrastructure & Biodiversity	Support for blue-green infrastructure and biodiversity enhancement. Severn Trent's "Great Big Nature Boost" campaign aims to: • Revive 12,000 acres of land. • Plant 1.3 million trees. • Restore 2,000 km of rivers by 2027. Proposed policies: • Blue and Green Infrastructure Policy: Development should enhance blue-green corridors and protect watercourses. • Green Open Spaces Policy: Flood resilience schemes in green spaces supported if they don't harm the space's primary function. Emphasis on Sustainable Drainage Systems (SuDS) and alignment with NPPF paragraph 170.
Strategic Planning & Cross-Boundary Cooperation	Concerns from Leicestershire County Council about HBBC's approach, lack of detail, and unrealistic timetable. Issues with the effectiveness of joint working and the soundness of the Local Plan. Reference to the Leicester & Leicestershire Housing Market Area (HMA) and Functional Economic Market Area (FEMA).

	Need for HBBC to identify land to meet Leicester City's unmet housing and employment needs. Criticism of Policy SS03 (Local Plan Review) for delaying action on unmet needs.
Infrastructure & Transport	Support for Policy HT01 (Highways and Transportation) and HT04 (A5 Improvement Corridor). Strategic Business Case and Road Safety Audit submitted for A5 access. Emphasis on sustainable transport and safeguarding land for future infrastructure.
Housing Strategy & Delivery	Concerns about over-reliance on Barwell and Earl Shilton SUEs (Strategic Urban Extensions). Delays in planning applications and infrastructure issues raise doubts about deliverability. Suggestion to redistribute housing to sustainable rural areas. Calls for increased housing numbers to meet affordable housing needs and support economic growth. Criticism of the plan for not addressing Leicester's unmet housing need.
Waste management and utilities	Severn Trent encourages early engagement from developers. Recommendations for policies on: • Drainage hierarchy. • Sustainable Drainage Systems (SuDS). • Water resource protection. • Water efficiency (110 litres/person/day target). Emphasis on avoiding surface water discharge into foul sewers.

Table 6: Main Issues raised on supplementary documents and additional plans

Document	Main Issues Raised
Sustainability Appraisal	• Explicit NPPF and NPPG Requirements Ignored: National Planning Policy Framework and Planning Practice

Guidance clearly require Sustainability Appraisal (SA) to inform plan preparation and site selection, and for the SA report (including non-technical summary) to be published alongside the draft plan for at least six weeks. This has not occurred.

- The Submission Local Plan was published without a supporting Sustainability Appraisal (SA), breaching Section 19(5) of the Planning and Compulsory Purchase Act 2004 and Regulations 17 and 19 of the Local Planning Regulations 2012. The latest SA is from September 2020 and does not cover the Submission version.
- Failure to Consult Statutory Bodies: NPPG guidance states that consultation bodies and affected parties must be consulted during the SA process. The absence of an SA means these legal obligations have not been met.
- Missed Opportunity for Evidence-Based Site Selection: Without SA, the Council cannot demonstrate that site allocations were chosen based on sustainability criteria or that reasonable alternatives were assessed. This undermines transparency and accountability.
- Outdated Evidence Base: The most recent SA work available is dated September 2020, which predates key policy changes and site allocations. This is insufficient for the Submission version.
- No SA consultation occurred, and the Regulation 19 webpage did not list an SA report. This omission means the plan cannot demonstrate assessment of reasonable alternatives or compliance with legal requirements.
- Cannot Be Rectified at Examination: Legal compliance issues relating to SA and SEA cannot be fixed during the examination stage. The plan must be re-consulted with an up-to-date SA before submission.
- Risk of Legal Challenge: Failure to publish and consult on SA and HRA exposes the Council to potential legal

	challenge and jeopardizes the soundness of the Local Plan.
Strategic Environmental Assessment	No SEA or Environmental Report was published with the Regulation 19 Local Plan, contrary to the Environmental Assessment of Plans and Programmes Regulations 2004. The plan does not show assessment of significant effects, reasonable alternatives, or reasons for site selection/rejection. No updated appraisal of policies or site allocations has been consulted on since 2018. This omission requires a compliant SEA and re-consultation before submission.
Preliminary Site Selection Paper	- Concerns raised about the robustness and transparency of the site selection process. - The Preliminary Site Selection Paper (Feb 2022) is high-level and lacks detailed assessments, including consideration of heritage assets and sustainability credentials. No Site Selection Topic Paper or Sustainability Appraisal has been published to justify allocations or demonstrate comparison with reasonable alternatives. Deliverability issues identified for key allocations (Barwell, Earl Shilton, Market Bosworth) and reliance on these sites questioned. - Evidence base is not proportionate, and without further assessment, the process is considered flawed. - Calls for additional sustainable and deliverable sites to be assessed and allocated to ensure housing requirements are met. - Lack of detailed site assessment and absence of a Site Selection Topic Paper or Sustainability Appraisal undermines confidence in the robustness of the process.
Rural Housing Numbers Methodology Statement	Concerns over inconsistencies in settlement boundaries and lack of transparency in the methodology for rural housing numbers.

	• Respondents argue that Twycross, Witherley, Markfield, and Ratby should receive higher allocations due to sustainability, infrastructure capacity, and connectivity to higher-order settlements. • Evidence suggests Witherley could be considered a Key Rural Centre or accommodate more growth to support local services and address affordable housing need. • The Rural Housing Numbers Methodology Statement does not clearly explain how evidence and settlement characteristics informed minimum dwelling figures, which appear arbitrary and disconnected from overall housing targets. • Calls for a review of methodology and increased allocations in sustainable settlements to meet housing and affordable housing needs.
Settlement Hierarchy Paper December 2021	• General support for the settlement hierarchy approach, but significant concerns about methodology, transparency, and resulting allocations. • Figures for housing distribution appear arbitrary and disconnected from overall targets, with insufficient consideration of sustainability factors such as connectivity, employment opportunities, and infrastructure capacity. • Nailstone: Classified as a Rural Hamlet despite proximity to major employment site (Nailstone Colliery) and local facilities, which respondents argue justifies Rural Village status. • Desford, Markfield, Ratby: Highly sustainable locations with strong transport links and substantial affordable housing need, yet limited growth proposed. • Burbage: Lack of justification for discounting alternative sites (e.g., Lychgate Lane). • Concerns also raised about reliance on large sites like Hinckley West given historic delivery delays, risking five-year land supply. Borough-wide affordable housing need

	(271 homes per annum) far exceeds historic delivery, yet the plan does not propose increasing housing numbers or targeting growth in Key Rural Centres where higher affordable housing percentages could be achieved. Calls for reclassification of settlements, additional allocations in sustainable locations, and clearer evidence demonstrating how site choices were informed by Sustainability Appraisal and reasonable alternatives.
Settlement Inset Maps	• Requests clarification on the planning status of allocated sites in Burbage near Sapcote Road and whether boundary adjustments (e.g., BUR01H southern boundary) can be made to follow existing hedgerow lines. • Concern raised about the Market Bosworth site (Sedgemere 21/00379/FUL) intersecting a National Grid gas transmission pipeline (Blaby to Alrewas route), highlighting potential safety and deliverability issues. • Support expressed for development in urban areas and the settlement hierarchy, but strong objections to proposed housing in Thornton (e.g., Site AS33). Key concerns include severe highway congestion, road safety risks, inadequate parking, and existing issues with illegal parking linked to reservoir visitors. • Additional objections relate to insufficient village amenities, school capacity, and loss of countryside and natural habitat, including impacts on public footpaths and the National Forest. Respondents argue the site does not provide an acceptable extension to the village and would significantly harm its character.
Conservation Area Appraisal	• Request for Hinckley and Bosworth Borough Council to review its conservation area designations due to the age of the current appraisal and deterioration of character. Suggestion to assess whether the site should remain within the conservation area and concern that Hansom Court is detrimental to the existing conservation area.

Neighbourhood Plans

Desford NDP

- Concerns that Policy SS02 and Table 5 incorrectly count two Desford Neighbourhood Plan reserve sites, including land north of Kirkby Road (Ashfield Farm), as commitments despite no planning permission. Borough-wide and Desford inset maps label these sites as “residential” and “NDP reserve allocation,” creating confusion. Respondents request that these sites be properly allocated in Policy HO01 or removed from commitment figures to ensure accuracy and soundness.

Market Bosworth NDP

- Strong objection to the proposed allocation of 243 additional homes in Market Bosworth. Respondents highlight that the Neighbourhood Plan (MBNP) has been actively monitored and updated, with community-supported projects and engagement undertaken in collaboration with HBBC. Concerns that the Local Plan disregards this work and previous assurances that allocations would be proportionate and aligned with Neighbourhood Plan objectives. The approach is seen as undermining community trust and the Neighbourhood Planning process, raising questions about soundness and justification.

Markfield NDP

- Concerns that the Markfield Neighbourhood Plan housing figure (334 dwellings) is not aligned with the Borough’s spatial strategy or evidence on sustainability and capacity. Respondents argue the approach fails to consider Markfield’s role as a Key Rural Centre, its connectivity, and ability to contribute to unmet housing and affordable housing needs. Calls for a more strategic distribution of growth and additional allocations in Markfield to reflect its size, services, and potential to deliver affordable housing.

Habitat Regulation Assessment

- No evidence that the Submission Plan has been re-screened under Habitats Regulations despite earlier advice that significant effects could occur. This omission risks non-compliance with the Conservation of Habitats and Species Regulations.
- A Shadow Habitat Regulations Assessment Screening Report was published in draft form in September 2020 under the Conservation of Habitats and Species Regulations 2017.
- If significant effects cannot be ruled out, a detailed Appropriate Assessment must be undertaken.
- The 2020 screening concluded that spatial strategy options and policy issues could have likely significant effects, requiring further assessment when the draft Local Plan is available.
- The submission Local Plan has not been re-screened, which is a major compliance issue.
- Natural England issued advice on 16 March 2022 regarding nutrient impacts on habitats, including the River Mease SAC within Hinckley and Bosworth.
- Local authorities must undertake an Appropriate Assessment with mitigation measures for nutrient impacts, this has not been done.

Appendix C: Detailed representations received and the council's response

Please see separate document