



Hinckley & Bosworth
Borough Council

LOCAL PLAN 2024-2045 REGULATION 18 CONSULTATION REPORT (2025)

REGULATION 18 CONSULTATION REPORT

17 OCTOBER TO 28 NOVEMBER 2025

HINCKLEY & BOSWORTH BOROUGH COUNCIL

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1. Executive Summary

- 1.1. The Hinckley & Bosworth Borough Local Plan 2024–2045 Regulation 18 consultation was undertaken between 17 October and 28 November 2025. The consultation sought views on new and amended elements of the emerging Local Plan, including additional housing and employment site options, revised draft planning policies, and supporting evidence prepared in response to changes in national planning policy and updated local evidence.
- 1.2. The consultation formed a key stage in the preparation of the Local Plan and provided residents, businesses, landowners, developers, infrastructure providers, statutory consultees and other stakeholders with the opportunity to comment on the Council's emerging proposals before the Plan progresses to the Regulation 19 Pre-Submission stage. Consultation activities included direct notifications, online engagement, social media campaigns, newsletters, public exhibitions and document deposits across the borough.
- 1.3. A total of 710 responses were received during the consultation period, with a further 27 responses received after the consultation had closed. The responses generated 1,029 individual representations relating to draft policies, site allocations and supporting evidence base documents.
- 1.4. The consultation generated considerable interest, particularly in relation to the proposed spatial strategy, housing growth requirements and the identification of development sites. The greatest volume of comments related to the proposed Norton Heath New Settlement (LPR231), which attracted significant public interest and a substantial number of objections concerning its scale, location, environmental impacts, transport implications, infrastructure requirements and overall deliverability. A number of statutory consultees also raised detailed technical matters requiring further consideration as the Plan progresses.
- 1.5. More generally, consultation responses highlighted concerns regarding transport capacity, infrastructure provision, healthcare and education services, flood risk and drainage, biodiversity impacts, the loss of agricultural land and the adequacy of supporting evidence. Many respondents sought further information regarding site selection, the distribution of growth across the borough and the delivery of supporting infrastructure. Several representations also called for the publication of additional technical evidence and detailed site-specific frameworks prior to the submission of the Plan.
- 1.6. The consultation also generated constructive feedback on a range of policy matters. Respondents provided detailed comments on the Plan's approach to sustainable development, housing delivery, employment land provision, healthy place-making, open space and recreation, and environmental protection. Statutory consultees, including Historic England, Natural England, National Highways, Sport England and Severn Trent Water, provided technical advice that will help inform future revisions to policies, site allocations and supporting evidence.
- 1.7. The Council has considered all representations received and will continue to review the evidence base, undertake further technical work where necessary, and make amendments to the Local Plan where appropriate. The consultation has provided

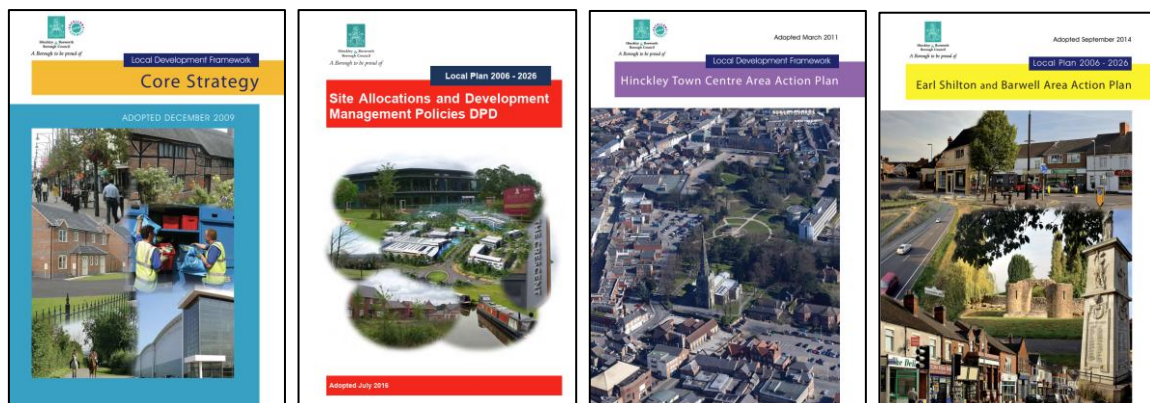
valuable insight into the issues of greatest importance to communities and stakeholders and will inform the preparation of the Regulation 19 Pre-Submission Local Plan.

- 1.8. Overall, the consultation demonstrated strong public engagement in the future planning of the borough. While significant concerns were raised regarding elements of the proposed strategy and specific site allocations, the responses have helped identify key matters requiring further consideration, ensuring that the emerging Local Plan is supported by a robust evidence base and is positively prepared, justified, effective and consistent with national planning policy.

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 2045. 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).
 - Hinckley Town Centre Area Action Plan (March 2011); and
 - Earl Shilton and Barwell Area Action Plan (September 2014).

Figure 1. Local Plan 2006-2026



- 2.4. The Regulation 18 consultation represents a formal stage in the preparation of the Hinckley & Bosworth Borough Council Local Plan 2024–2045. Its purpose is to gather comments on emerging strategic sites (greater than 500 dwellings or greater than 1 hectare of employment land), major housing allocations (101–499 dwellings), and draft policies. This stage invites participation from a wide range of stakeholders including

residents, statutory consultees, and developers, to provide feedback on the emerging Local Plan. It offers an opportunity to assess whether the draft proposals align with national planning policy and comply with relevant legislative requirements, helping to shape a sound and legally robust plan.

- 2.5. The consultation is being undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This stage enables the local planning authority to engage with stakeholders, including residents, statutory bodies, and developers on the emerging content of the Local Plan. It provides an opportunity to shape the direction of the Plan by inviting views on proposed policies, strategic site allocations, and the supporting evidence base. Feedback received will help ensure the Plan is positively prepared, justified, effective, and consistent with national planning policy, ahead of its formal publication under Regulation 19.
- 2.6. Prior to the Regulation 18 consultation, Hinckley & Bosworth Borough Council undertook several earlier engagement stages, including:
 - **Scope, Issues and Options consultation (January to February 2018)**, which explored key themes and challenges facing the borough.
 - **New Directions for Growth consultation (January 2019)**, which examined strategic growth options.
 - **Draft Local Plan consultation under Regulation 18 (June to August 2021)**, which presented initial policy proposals and site allocations.
 - **Sustainability Appraisal consultation (November 2020 to January 2021)**, which assessed the environmental, social, and economic impacts of the plan.
 - **Draft Submission Local Plan (February to March 2022)**, which set out 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.
 - **Regulation 18 Draft Local Plan consultation (June to August 2024)**, which sought views on emerging strategic sites, major housing allocations and a comprehensive suite of draft planning policies to inform the next stage of plan preparation.
 - **Further Regulation 18 Draft Local Plan consultation (October to November 2025)**, which focused on new and amended elements of the Plan that had emerged since the 2024 consultation, including additional development site options and updated draft policies.
- 2.7. Following publication of the Draft Submission Local Plan in 2022, subsequent changes in national policy and local evidence required further plan review and additional Regulation 18 consultations.
- 2.8. The Regulation 18 consultation undertaken in 2024 represented a significant stage in the preparation of the Local Plan, enabling stakeholders to comment on the Council's proposed spatial strategy, development site options and emerging planning policies. Responses received through this consultation informed further work on the Local Plan, including the preparation of additional evidence and refinement of policies and site proposals. A Sustainability Appraisal was published alongside the draft Plan to assess

its likely social, environmental and economic effects and to ensure sustainability considerations continued to inform plan-making.

- 2.9. Following the conclusion of the 2024 Regulation 18 consultation, the Council determined that a further Regulation 18 consultation was necessary before progressing to Regulation 19. This was driven by a number of factors, including changes to national planning policy through revisions to the National Planning Policy Framework (NPPF) published in December 2024 and the associated changes to the Standard Method for calculating local housing need, which resulted in revised housing requirements for the borough. In response, the Council identified additional development sites and prepared new and amended draft policies. Furthermore, a number of key evidence base documents required updating in light of the changing national policy context and the latest available data. The 2025 Regulation 18 consultation therefore provided stakeholders with an opportunity to comment on these new and revised elements of the Local Plan before the Plan progressed to the Regulation 19 Pre-Submission stage. Discussions regarding Leicester City Council's unmet housing and employment needs also remained ongoing and formed part of the wider strategic context influencing the preparation of the Local Plan.

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 18 Consultation Draft.

Strategic Collaboration and Plan Preparation

- 3.2. The preparation of the Hinckley & Bosworth Local Plan has taken place within a wider framework of collaborative working across Leicester and Leicestershire. The delivery of sustainable growth, infrastructure and services extends beyond individual administrative boundaries, requiring local authorities and partner organisations to work together to address strategic planning matters and support the long-term prosperity of the area.
- 3.3. Hinckley & Bosworth Borough Council has a long-established history of working in partnership with neighbouring authorities, Leicestershire County Council, statutory bodies and other key stakeholders. This joint approach has supported the identification and resolution of cross-boundary planning issues and has helped ensure that the Local Plan is informed by a robust and consistent evidence base.
- 3.4. Key examples of this collaborative working include:
- Participation in the preparation and ongoing implementation of the Leicester and Leicestershire Strategic Growth Plan, which sets out a shared vision for growth across the area to 2050.
 - Joint commissioning and preparation of technical evidence studies, including housing and economic needs assessments, strategic flood risk assessments, water cycle studies and infrastructure planning evidence.
 - The preparation of Statements of Common Ground to record areas of agreement and ongoing discussions on strategic planning matters.
 - The use of Memorandums of Understanding where appropriate to establish shared principles and commitments between authorities and partner organisations.
 - Regular engagement through established strategic planning forums and officer groups, including the Leicestershire Task and Finish Group and the Coventry, Solihull and Warwickshire Association of Planning Officers (CSWAPO).
- 3.5. The Council has continued to work proactively with authorities across the Leicester and Leicestershire Housing Market Area and Functional Economic Market Area on matters relating to housing and employment needs, strategic infrastructure, transport, environmental issues and growth distribution. This work has informed successive iterations of the Local Plan and has been particularly important in considering the implications of Leicester City's unmet development needs and changes to national planning policy.
- 3.6. The Council acknowledges that reforms to the plan-making system have altered the statutory framework relating to strategic planning and cross-boundary engagement since earlier stages of Local Plan preparation. References within this report to the Duty to Cooperate reflect either previous stages of plan preparation, consultation representations submitted by respondents, or historic evidence prepared under the

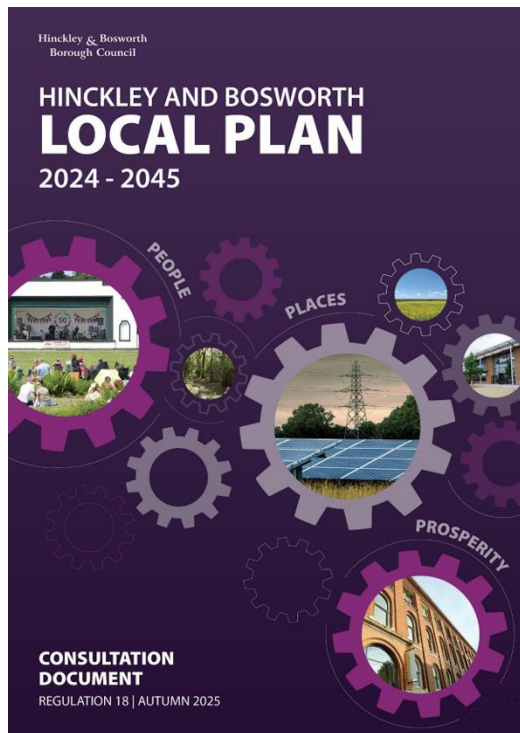
legislative framework that applied at the time. Regardless of changes to statutory requirements, the Council remains committed to continuing constructive engagement with neighbouring authorities, infrastructure providers and other prescribed bodies on strategic planning matters that extend beyond administrative boundaries.

- 3.7. The collaborative approach underpinning the Local Plan has extended beyond external organisations. Throughout the plan-making process, the Planning Policy team has engaged with a wide range of Council services, including housing, economic development, environmental health, climate change, infrastructure, green spaces and the built and natural environment teams. This has helped ensure that the emerging Local Plan reflects corporate priorities and supports the delivery of an integrated and achievable spatial strategy.
- 3.8. Close working has also taken place between Planning Policy and Development Management officers. Development Management staff have provided valuable insight into local development trends, planning application outcomes, appeal decisions and practical implementation considerations. This ongoing dialogue has assisted in refining draft policies, assessing the deliverability of site allocations and ensuring that proposed policy approaches can be effectively applied through the development management process.
- 3.9. Member engagement has remained an important part of Local Plan preparation through the Local Plan Member Working Group. This cross-party advisory group provides an opportunity for elected Members to consider emerging evidence, review draft policies and discuss key planning issues before formal decisions are made through the Council's governance processes. Feedback from the Working Group has helped inform the evolution of the Local Plan and ensure that Members remain engaged throughout the plan-making process.

Regulation 18 Consultation

- 3.10. The Local Plan Regulation 18 consultation was conducted from Friday 17 October to Friday 28 November 2025. The consultation was undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement. The requirements of the Statement of Community Involvement were met through direct notification of consultees, publication on the Council's website, social media engagement, public exhibitions, document deposit locations and public notices.

Figure 2. Local Plan 2024-2045 Front Cover



- 3.11. To ensure widespread awareness and accessibility, the Council employed a broad range of communication methods throughout the consultation period. These were designed to reach as many individuals and organisations as possible across the borough. The paragraphs below outline the various engagement activities undertaken to promote the consultation and encourage participation.

Direct Notification

- 3.12. The Council has an established consultation database of individuals, landowners, developers, agents, stakeholders, and others who have indicated that they wish to be notified of updates and consultations in respect of the Local Plan.
- 3.13. Consultation letters and emails notifying recipients of the consultation period, explaining how representations could be submitted and specifying the deadline for responses were sent directly to those stakeholders and members of the public registered on the Local Plan Consultation database including those previously consulted on previous versions of the Local Plan.

- 3.14. Where a record of an email address exists on the database the consultation notification letter has been sent via that medium unless otherwise stated.
- 3.15. Direct notification was sent to those on the database which included:
- Statutory consultees
 - Neighbouring Local Authorities
 - Local Authorities in the Housing Market Area
 - Residents
 - Landowners
 - Developers
 - Agents
 - Infrastructure providers
 - Community Groups
 - Organisations
 - Parish and Town Councils and
 - Borough Councillors
- 3.16. In addition to this wide range of individuals and organisations, those not directly consulted would have also been reached through other methods of engagement highlighted below.
- 3.17. A copy of the consultation notification letter can be viewed in Appendix A.

Borough Council's Website

- 3.18. 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 18 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

- 3.19. To broaden the reach of the Regulation 18 consultation and engage a wider audience, Hinckley & Bosworth Borough Council actively used its social media platforms including; X (formerly known as Twitter), Instagram, LinkedIn 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.
- 3.20. Appendix A includes examples of social media posts which were used during the consultation.

Press Release

- 3.21. A press release was issued to formally announce the launch of the Regulation 18 consultation for the Hinckley & Bosworth Borough Council Local Plan 2024–2045. 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 and published on the Council's website, helping to raise awareness and encourage broad participation across the borough.

The Borough Bulletin

- 3.22. An article was published in the quarterly Borough Bulletin to notify residents of the borough of the Regulation 18 consultation and invite representations. The Summer/Autumn 2025 Borough Bulletin was delivered to every household in the borough and a copy of the article can be viewed in Appendix A.

Residents e-newsletter

- 3.23. The Borough Council promoted the Regulation 18 consultation through a series of articles published in its Resident E-Newsletter, which was distributed to subscribers by email on 15 October, 21 October, 29 October and 12 November 2025. In addition, a dedicated Planning E-Newsletter focusing on the Local Plan consultation was issued during the consultation period. These communications provided information on the draft Local Plan, explained how to participate in the consultation, and publicised the programme of engagement events. Copies of the newsletter articles are provided in Appendix A.

Posters

- 3.24. Posters were distributed to parish councils across the borough to encourage local participation. A poster was also displayed in reception of 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

- 3.25. As part of the Regulation 18 consultation, a series of public engagement events were held across the borough to provide residents, businesses, and stakeholders with opportunities to speak directly with planning officers. These events were designed to support understanding of the draft Local Plan, answer questions, and offer guidance on how to submit formal representations.
- 3.26. No booking was required for the in-person sessions, which were hosted at accessible community venues across a range of locations. Planning officers were available throughout each event to discuss the proposals and gather informal feedback.
- 3.27. The following in-person events took place:
- Newbold Verdon Cricket Club, Alans Way, Newbold Verdon – Saturday 25 October 2025, 10:00am–1:00pm

- St Simon & St Jude's Church Hall, High Street, Earl Shilton – Monday 27 October 2025, 5:30pm–8:30pm
- Markfield Congregational Community Church, Main Street, Markfield – Thursday 30 October 2025, 4:00pm–8:00pm
- Twycross Village Hall, Burton Road, Twycross – Tuesday 4 November 2025, 4:00pm–7:30pm
- Hinckley Hub – Tuesday 25 November 2025, 5:30pm–7:30pm

3.28. These events formed a key part of the Council's commitment to inclusive and accessible engagement, ensuring that a wide range of voices could contribute to the development of the Local Plan.

Figure 3. Consultation events at Newbold Verdon, Earl Shilton and Hinckley.



Document Availability

- 3.29. To ensure accessibility, consultation documents were made available through multiple formats. Copies of Local Plan Regulation 18 Version and supporting documents were made available on the Councils website www.hinckley-bosworth.gov.uk and hard copies were deposited at Hinckley Hub, Burbage Community Library, Desford Library Community Hub, Groby Community Library, Hinckley Library, Newbold Verdon Library, Earl Shilton library, Market Bosworth Library, Markfield Library, and Ratby Library.
- 3.30. Printed copies were also sent directly to individuals upon request, ensuring that those without internet access could still participate.

4. Overview of the Consultation Responses

- 4.1. The Local Plan Regulation 18 consultation received 710 responses received within the consultation period. A further 27 consultation responses were received late and outside of the consultation period. Representations received during the formal consultation period equated to 1,029 individual representations on specific elements of the Plan.
- 4.2. All representations received on the Local Plan have been considered and amendments and revisions made where considered appropriate.

Summary of responses

- 4.3. 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 are provided in the paragraphs below and 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 (please note this is a separate document).

Consultation process and overall approach

- 4.4. A significant number of representations commented on the consultation process itself. The six-week consultation period was widely criticised as being insufficient given the scale and complexity of the Draft Local Plan, the volume of supporting evidence published, and the inclusion of the proposed Norton Heath new settlement. Respondents referred to requests and petitions seeking an extension to the consultation period and expressed concern that these requests had not been accepted. Concerns were also raised regarding the accessibility and navigation of the consultation material, with respondents citing the number of evidence base documents, the structure of the consultation questionnaire, and the absence of certain accessible formats. A recurring criticism was that key evidence and policy detail had been deferred to Regulation 19, limiting opportunities for meaningful public engagement at Regulation 18.
- 4.5. Several respondents sought clarification regarding the relationship between the 2024 and 2025 Regulation 18 consultations, noting differences in housing and employment figures and plan periods. Requests were also made for greater transparency regarding how consultation responses would be analysed, reported and used to inform the next version of the Local Plan.

Vision and Strategic Objectives

- 4.6. Responses to the Vision and Strategic Objectives were mixed. While there was support for the overarching ambition to deliver sustainable growth, support neighbourhood planning and protect environmental assets, a number of respondents questioned whether the Vision aligned with the scale and location of development proposed elsewhere in the Plan. In particular, concerns were raised regarding the apparent tension between commitments to protect and enhance the natural and historic environment and proposals for substantial greenfield development. Respondents sought clearer explanation of how growth would be balanced against environmental protection and requested more measurable outcomes against which progress could be monitored. Historic England also sought stronger recognition of archaeology, non-designated heritage assets and the wider historic environment within the objectives framework.

Sustainable Development and General Development Principles

- 4.8. Representations on Policy REV01 (Sustainable Development) focused on the definition and application of sustainability within the emerging Local Plan. Several respondents considered the policy insufficiently clear in explaining how sustainable locations would be identified and how development would contribute towards climate change mitigation and adaptation objectives. Requests were made to strengthen references to heritage assets and the historic environment. Conversely, several development industry respondents considered the policy unnecessary, arguing that it duplicates the presumption in favour of sustainable development already contained within the National Planning Policy Framework.

Spatial Strategy

- 4.9. The Spatial Strategy chapter generated the largest number of consultation responses and was the principal focus of public interest throughout the consultation. A recurring theme was concern regarding the overall scale of development proposed within the Borough, the calculation of housing need, the treatment of Leicester City's unmet housing requirement and the justification for accommodating growth beyond identified needs. Respondents sought greater clarity regarding the housing trajectory, flexibility allowances and the rationale for the distribution of growth between settlements.
- 4.10. Concerns were also raised regarding Policy NEW01 (Safeguarding Development Potential), particularly in relation to the safeguarding of strategic infrastructure associated with Norton Heath, Nuneaton Parkway Station and the proposed Hinckley Western Link Road. Respondents questioned the deliverability, funding and justification of these infrastructure proposals and argued that the policy lacked sufficient certainty regarding the nature and extent of infrastructure being safeguarded. Infrastructure issues raised in relation to safeguarding included transport, drainage, flood alleviation and healthcare provision.
- 4.11. Representations on Policy NEW02 (Provision of Overall Development) highlighted concerns regarding inconsistencies in housing figures presented throughout the supporting text and sought greater transparency regarding how housing requirements had been calculated. Respondents questioned the distribution of growth across the settlement hierarchy and whether sufficient evidence existed to justify the proposed pattern of development. Development interests generally supported a more flexible approach and sought confirmation that housing requirements should be treated as minimum rather than maximum figures.

Site selection and housing allocations

- 4.12. Policy NEW03 (Housing Development Sites) generated substantial interest and attracted the highest volume of policy-related representations. A significant proportion of respondents questioned the robustness of the evidence base supporting the proposed allocations, particularly the absence of a Sustainability Appraisal Environmental Report, reliance on an older SHELAA assessment and the publication of site allocations before the completion of key technical studies. Numerous comments challenged the transparency of the site selection process and requested clearer explanation as to how sites had been selected from the wider pool of promoted land.

- 4.13. Respondents also questioned whether sufficient priority had been given to brownfield and previously developed land before greenfield sites were selected for allocation. Concerns were raised regarding housing mix, affordable housing provision, accessibility requirements and accommodation for older people and disabled residents. Parish councils, statutory consultees and community groups also emphasised the importance of ensuring neighbourhood plans and locally prepared evidence are reflected within future iterations of the Plan.

Norton Heath New Settlement (LPR231)

- 4.14. By a considerable margin, the proposed Norton Heath new settlement allocation (LPR231) attracted the greatest number of representations received during the consultation. The majority of representations objected to the allocation, raising concerns across a broad range of planning, environmental, infrastructure and delivery matters. Many respondents questioned the principle of directing significant growth to a predominantly rural location, rather than concentrating development in or adjacent to existing settlements with established services and infrastructure.
- 4.15. Highway and transport impacts were the most frequently raised issues. Respondents expressed concern about the ability of the A444, B4116 and wider rural road network to accommodate the scale of growth proposed, and highlighted the absence of published transport modelling or strategic transport evidence. Related concerns were raised regarding construction traffic, road safety and cumulative impacts on the wider transport network.
- 4.16. Infrastructure delivery was also a major theme. Representations repeatedly cited concerns regarding school capacity, healthcare provision, utilities, wastewater treatment, emergency services and community facilities. A common concern was that the infrastructure necessary to support a new settlement of this scale had not been sufficiently evidenced, funded or phased. Questions were also raised regarding land assembly, governance structures, delivery mechanisms and overall viability.
- 4.17. Environmental concerns featured prominently. Objections referenced flood risk, drainage, impacts on the River Mease SAC, biodiversity loss, landscape character, dark skies, agricultural land quality and the loss of rural character. Natural England, Historic England and Severn Trent Water raised significant technical concerns, particularly in relation to water quality, wastewater infrastructure, heritage impacts and environmental constraints. Parish councils and local groups also expressed concerns regarding cross-boundary impacts, consultation arrangements and compliance with the Duty to Cooperate.
- 4.18. A single, very substantial representation was received from the Norton Heath Development Opposition Group (NHDOG), extending to 382 pages. The representation objected to the proposed strategic allocation at Norton Heath, which comprises approximately 10,000 homes overall, including 2,500 homes and 14 hectares of employment land within the current plan period, on approximately 700 hectares of farmland. NHDOG contended that the allocation is unsound, arguing that it is not positively prepared, justified, effective or consistent with national policy.
- 4.19. The NHDOG representation raised concerns across the full range of plan-making matters, including the loss of productive farmland and implications for food security; ecology and biodiversity net gain; flood risk, hydrology and nutrient neutrality affecting

the River Mease SAC; climate and carbon impacts; air quality, noise and landscape effects; impacts on Twycross Zoo and animal welfare; transport capacity on the A444 and B4116; heritage and townscape character; capacity of schools, health services, emergency services, utilities and digital infrastructure; the underuse of brownfield land and existing permissions; viability and infrastructure funding; governance and delivery arrangements; the Duty to Cooperate with North West Leicestershire District Council; and the adequacy of consultation engagement, including the event held at Twycross Village Hall on 4 November 2025.

- 4.20. The representation also questioned the strategic justification for a new settlement and the assessment of reasonable alternatives, arguing that the allocation is not supported by sufficient evidence and that alternatives have not been adequately explored.
- 4.21. Given the volume and technical range of matters raised, officers have prepared a dedicated topic-based summary of the issues raised, set out in Appendix B (Table 5. Norton Heath Representation - 'You can't mitigate this' (representation from Norton Heath Development Opposition Group). Officers will consider each topic area as part of the ongoing evidence base review ahead of Regulation 19, alongside representations received on LPR231 from other consultees and statutory bodies.

Other Housing Allocations

- 4.22. Comments on other proposed housing allocations generally reflected similar themes to those raised in relation to Norton Heath, albeit on a smaller scale. The allocation south of Desford (LPR151A) generated significant concern regarding highway capacity, school and healthcare provision, drainage, air quality and the overall scale of growth proposed relative to the size of the village. Additional concerns related to impacts on heritage assets, village character and consistency with neighbourhood planning objectives.
- 4.23. The proposed allocation at Sheepy Magna (AS519) generated substantial objection, principally relating to flood risk, drainage, highway access and the loss of agricultural land. Respondents also highlighted perceived conflicts with the adopted Sheepy Parish Neighbourhood Plan and raised concerns regarding biodiversity, recreation space and sewerage capacity. More limited representations on other allocations raised recurring concerns relating to highway capacity, landscape impact, biodiversity, heritage assets, infrastructure constraints and cumulative development pressures.

Economic Prosperity

- 4.24. Responses to Policy NEW04 (Employment Development Sites) focused on both the overall employment strategy and the suitability of specific sites. The proposed employment element within the Norton Heath allocation generated significant opposition, with respondents arguing that it would add further infrastructure, environmental and transport pressures to an already constrained location. Concerns were also raised regarding the timing of employment allocations before the completion of strategic employment evidence and distribution studies.
- 4.25. Conversely, support was expressed by some respondents for strategic employment allocations located close to the M69 and A5 corridors. Supporters highlighted the economic benefits, strategic accessibility and contribution towards meeting identified employment land requirements. Historic England raised concerns regarding the

potential impact of several employment allocations on designated heritage assets and archaeological interests.

Healthy Place-making, Open Space and Recreation

- 4.26. Representations regarding healthy place-making and leisure-related policies were comparatively limited but focused on ensuring adequate provision of open space, recreation facilities and sports infrastructure alongside new development. Sport England objected to aspects of Policy NEW05, arguing that stronger standards and mechanisms are required to secure outdoor sports provision and protect existing playing fields. Additional comments sought stronger protection of public rights of way, green infrastructure networks and access to informal recreation opportunities.

Supporting Evidence Base

- 4.27. The supporting evidence base attracted considerable comment, particularly in relation to the Settlement Hierarchy Methodology Paper, Site Selection Methodology Paper and Sustainability Appraisal. Respondents consistently argued that the methodologies had been published without demonstrating how they were applied in practice, limiting the ability of stakeholders to understand and test site selection and growth distribution decisions. Concerns were also expressed regarding the age of some evidence sources and the absence of updated assessments.
- 4.28. The Sustainability Appraisal generated significant representations from statutory consultees and community groups. Historic England considered the appraisal was lacking because only a Scoping Report had been published and no Environmental Report accompanied the consultation. Similar concerns were expressed by CPRE Leicestershire, which considered the evidence base inadequate and insufficiently robust to support the proposed strategy. Natural England provided recommendations regarding biodiversity, green infrastructure and climate change considerations to be incorporated into future appraisal work.

Cross-cutting themes

- 4.29. Several issues emerged repeatedly across multiple chapters, policies and site allocations. The most commonly raised concern was highway capacity and the absence of published transport modelling, followed closely by infrastructure provision and delivery. Respondents repeatedly questioned whether schools, healthcare services, utilities and community facilities could accommodate the proposed scale of growth and sought greater clarity regarding infrastructure funding, phasing and delivery mechanisms.
- 4.30. Flood risk and drainage represented another major area of concern, particularly in relation to greenfield allocations and locations affected by surface water flooding. Landscape character, settlement identity, biodiversity, agricultural land loss and heritage impacts also featured prominently across representations. Many respondents considered that further evidence and assessment work would be required to demonstrate that the proposed strategy and allocations are justified, deliverable and consistent with national planning policy.
- 4.31. Overall, the consultation demonstrated broad support for the preparation of a new Local Plan and for the objective of meeting the Borough's housing, employment and infrastructure needs. However, substantial concerns were raised regarding the evidence

base, the scale and distribution of growth, the deliverability of strategic infrastructure, and the proposed Norton Heath new settlement. Issues relating to transport, infrastructure capacity, environmental impacts, heritage assets and the soundness of the site selection process were consistently identified as the principal matters requiring further consideration in the preparation of the Regulation 19 Local Plan.

Appendix A: Copies of Consultation Material

Figure 4: Screenshot of social media post on Facebook – 17 October 2025

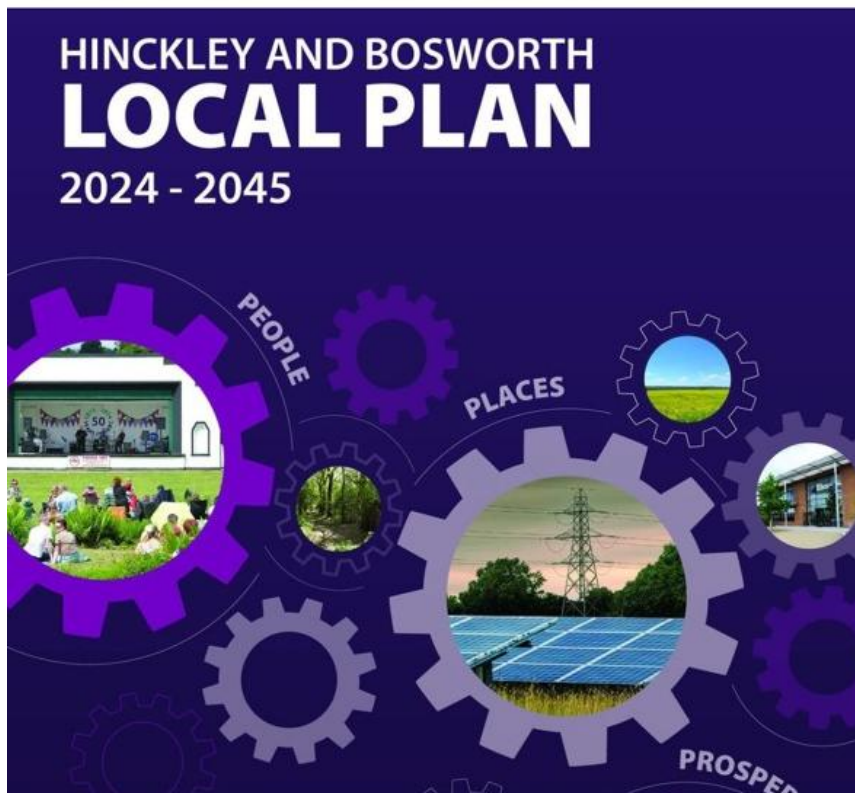
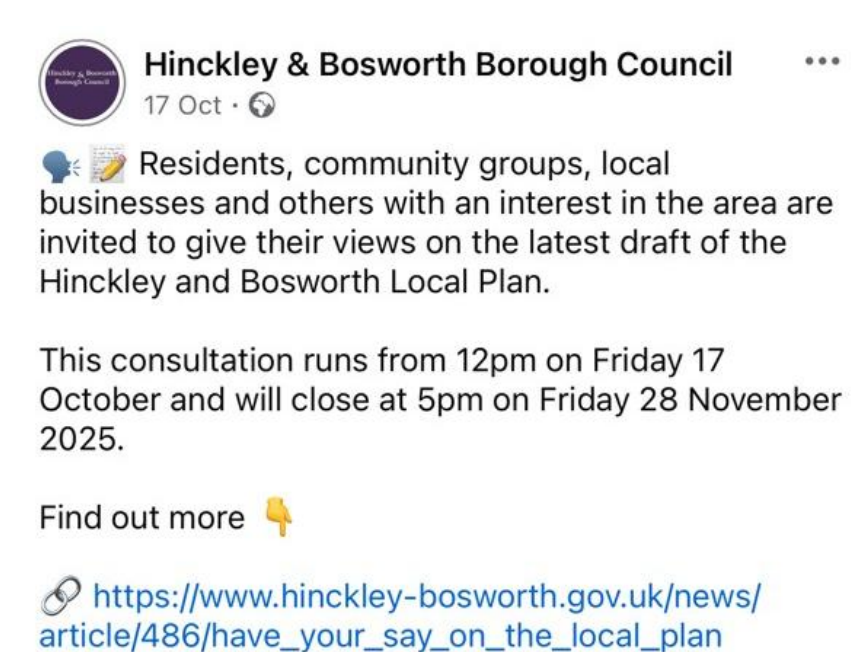


Figure 5: Screenshot of social media post on Facebook - 22 October 2025

 **Hinckley & Bosworth Borough Council** ...
22 Oct · 🌐

Local Plan consultation - have your say!... [See more](#)

Local Plan Consultation
Have your say

Newbold Verdon Cricket Club
Saturday 25 October, 10am - 1pm

**St Simon & St Judes Church Hall,
Earl Shilton**
Monday 27 October, 5.30pm - 8.30pm

**Markfield Congregational
Community Church**
Thursday 30 October, 4pm - 8pm

Twycross Village Hall
Tuesday 4 November, 4pm - 7.30pm

Hinckley Hub
Tuesday 25 November, 5.30pm - 7.30pm

For further information and how to submit comments visit
www.hinckley-bosworth.gov.uk/2025reg18

Hinckley & Bosworth
Borough Council

Figure 6: Infographic used in social media posts to advertise one of the consultation events



The infographic is set against a dark blue background. At the top, a white speech bubble contains the text 'Local Plan Consultation' in bold and 'Have your say' below it. Below this, the event details are listed in large white text: 'Newbold Verdon Cricket Club', 'Alans Way, Newbold Verdon', 'Saturday 25 October', and '10am to 1pm'. To the left of the event details, a paragraph in white text describes the opportunity to meet the Policy Planning Team. To the right, there is a graphic of three interlocking gears of different sizes. At the bottom, a purple banner contains the contact information and the council's name in white text.

Local Plan Consultation
Have your say

Newbold Verdon Cricket Club
Alans Way, Newbold Verdon
Saturday 25 October
10am to 1pm

Your opportunity to meet members of the Policy Planning Team to discuss future development in Hinckley and Bosworth up to 2045.

For further information and how to submit comments visit
www.hinckley-bosworth.gov.uk/2025reg18

Hinckley & Bosworth
Borough Council

Figure 7: Infographic used in social media posts to advertise consultation events



The infographic features a dark purple background with a white speech bubble at the top right containing the text 'Local Plan Consultation' and 'Have your say'. Below this, five consultation events are listed in white text. To the right of the events, there are three interlocking gears of different sizes, also in white. At the bottom, there is a dark purple footer bar with white text providing further information and the council's name.

Local Plan Consultation
Have your say

Newbold Verdon Cricket Club
Saturday 25 October, 10am - 1pm

**St Simon & St Judes Church Hall,
Earl Shilton**
Monday 27 October, 5.30pm - 8.30pm

**Markfield Congregational
Community Church**
Thursday 30 October, 4pm - 8pm

Twycross Village Hall
Tuesday 4 November, 4pm - 7.30pm

Hinckley Hub
Tuesday 25 November, 5.30pm - 7.30pm

For further information and how to submit comments visit
www.hinckley-bosworth.gov.uk/2025reg18

Hinckley & Bosworth
Borough Council

Figure 8: A copy of the article included in the Summer/Autumn 2024 Edition of the Borough Bulletin



Figure 9: Poster distributed to Parish Councils

HINCKLEY AND BOSWORTH LOCAL PLAN

2024 - 2045

X Instagram Facebook

PEOPLE

PLACES

PROSPERITY

Scan or visit to find out more and share your views.

www.hinckley-bosworth.gov.uk/localplanreview

The Regulation 18 Consultation closes on:
FRIDAY 28 NOVEMBER 2025 AT 5PM

Hinckley & Bosworth
Borough Council

Figure 10: Copy of Resident E-Newsletter Article – 21 October 2025

Update on the Hinckley & Bosworth Local Plan

Below you will find important updates regarding the Local Plan, along with details on how you can contribute to the consultation process and help shape future development.

Residents, community groups, local businesses and others with an interest in the area are invited to give their views on the latest draft of the Hinckley and Bosworth Local Plan.

This consultation is now live and will close at 5pm on Friday 28 November 2025.

The Local Plan is the key planning document for the borough that will guide future development in Hinckley and Bosworth, up to 2045. It sets out a preferred strategy for housing and economic growth and includes planning policies covering a range of issues such as providing the right housing in the right places, conserving and enhancing the natural and historic environment, good design and place-making, and responding to the challenges of climate change.

Following the previous consultation in Summer 2024, this new consultation relates to specific new or updated policies and site allocations only. Previous responses received in 2024 do not need to be re-submitted as they have already informed the development of these proposals and will continue to shape the next stage of preparing a full pre-submission version of the Local Plan (Regulation 19). We now welcome any new, targeted feedback on the content presented in this Regulation 18 consultation.

Next steps include another consultation, the next formal stage (known as Regulation 19), which is a full and complete draft of the Local Plan, in 2026 with a view to submitting the Local Plan to the Planning Inspectorate for Examination in Public by the end of 2026. Once it has completed this process, and the plan is adopted by the council, it will form the council's framework for decision-making on planning.

You will also have the opportunity to attend consultation events where planning officers will be available to answer questions, discuss views, and provide advice on how to submit comments. Dates are as follows:

- Newbold Verdon Cricket Club, Alans Way, Newbold Verdon, Saturday 25 October, 10am to 1pm
- St Simon and St Jude's Church Hall, High Street, Earl Shilton, Monday 27 October, 5:30pm to 8:30pm
- Markfield Congregational Community Church, Main Street, Markfield, Thursday 30 October, 4pm to 8pm
- Twycross Village Hall, Burton Road, Twycross, Tuesday 4 November, 4pm to 7:30pm
- Hinckley Hub, Rugby Road, Hinckley, Tuesday 25 November, 5:30pm to 7:30pm



Local Plan Consultation
Have your say

Newbold Verdon Cricket Club
Saturday 25 October, 10am - 1pm

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Thursday 30 October, 4pm - 8pm

Twycross Village Hall
Tuesday 4 November, 4pm - 7.30pm

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For further information and how to submit comments visit
www.hinckley-bosworth.gov.uk/2025reg18

Hinckley & Bosworth
Borough Council

Leader of the Council Cllr Stuart Bray 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 on its progress, and we are pleased to provide another opportunity for the public to have their say on updates and new information provided in this draft plan.

"We need to move the plan forward to meet the deadlines set by central government; in the meantime, we continue to call on a wide variety of partners to engage in constructive dialogue to ensure this plan is appropriate and sustainable. With a new Local Plan 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, as well as supporting the improvement and provision of infrastructure, facilities and services in our communities."

To keep up to date with consultation events and how to submit comments visit our Local Plan [web page](#).

Figure 11. Copy of Resident E-Newsletter Article – 29 October 2025

A reminder to have your say

As you may have seen in a recent edition of this newsletter, we're asking for your views on the Regulation 18 draft Local Plan. This consultation runs from **12pm on Friday 17 October and will close at 5pm on Friday 28 November 2025**.

You can [find out more and have your say online here](#).

If you want to discuss something further, meet our planning officers at one of the remaining consultation events

- Markfield Congregational Community Church, Main Street, Markfield – Thursday 30 October, 4pm - 8pm
- Twycross Village Hall, Burton Road, Twycross – Tuesday 4 November, 4pm - 7.30pm
- Hinckley Hub, Rugby Road, Hinckley – Tuesday 25 November, 5.30pm - 7.30pm

Figure 12. Copy of Resident E-Newsletter Article – 12 November 2025

Have your say: Local Plan

There is just over two weeks left to give your views on the Regulation 18 draft Local Plan. This is the key planning document guiding development in the borough - covering, for example, housing, jobs, infrastructure, environment and design. It will cover the period to 2045.

The consultation closes **at 5pm on Friday 28 November 2025**.

Want to discuss something further? You can meet our planning officers at the Hinckley Hub on Tuesday 25 November. The consultation event will run from 5:30pm until 7:30pm.

If you can't attend, [request a one-to-one chat with a planning officer](#) (by prior agreement only, subject to availability).

Figure 13. Copy of Planning News E-newsletter – 20 October 2025



Dear Resident

Thank you for subscribing to *Planning News*.

Below you will find important updates regarding the Local Plan, along with details on how you can contribute to the consultation process and help shape future development.

Residents, community groups, local businesses and others with an interest in the area are invited to give their views on the latest draft of the Hinckley and Bosworth Local Plan.

This consultation is now live and will close at 5pm on Friday 28 November 2025.

The Local Plan is the key planning document for the borough that will guide future development in Hinckley and Bosworth, up to 2045. It sets out a preferred strategy for housing and economic growth and includes planning policies covering a range of issues such as providing the right housing in the right places, conserving and enhancing the natural and historic environment, good design and place-making, and responding to the challenges of climate change.

Following the previous consultation in Summer 2024, this new consultation relates to specific new or updated policies and site allocations only. Previous responses received in 2024 do not need to be re-submitted as they have already informed the development of these proposals and will continue to shape the next stage of preparing a full pre-submission version of the Local Plan (Regulation 19). We now welcome any new, targeted feedback on the content presented in this Regulation 18 consultation.

Next steps include another consultation, the next formal stage (known as Regulation 19), which is a full and complete draft of the Local Plan, in 2026 with a view to submitting the Local Plan to the Planning Inspectorate for Examination in Public by the end of 2026. Once it has completed this process, and the plan is adopted by the council, it will form the council's framework for decision-making on planning.

The public will also have the opportunity to attend consultation events where planning officers will be available to answer questions, discuss views, and provide advice on how to submit comments. Dates are as follows:

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Local Plan Consultation
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Tuesday 25 November, 5.30pm - 7.30pm



For further information and how to submit comments visit
www.hinckley-bosworth.gov.uk/2025reg18

Hinckley & Bosworth
Borough Council

Leader of the Council Cllr Stuart Bray 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 on its progress, and we are pleased to provide another opportunity for the public to have their say on updates and new information provided in this draft plan.

"We need to move the plan forward to meet the deadlines set by central government; in the meantime, we continue to call on a wide variety of partners to engage in constructive dialogue to ensure this plan is appropriate and sustainable. With a new Local Plan 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, as well as supporting the improvement and provision of infrastructure, facilities and services in our communities."

To keep up to date with consultation events and how to submit comments visit our Local Plan [web page](#).

Figure 14: Copy of the direct notification letter which was issued via email or post

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



Hinckley & Bosworth
Borough Council

Please ask for: Planning Policy
Direct dial/ext: 01455 238141
Email: planningpolicy@hinckley-bosworth.gov.uk
Customer Ref No: **INSERT**
Our ref: LPCONSULTATION2025
Date: **INSERT**

ADDRESS

Dear **INSERT**

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

We're now asking for your views on the Regulation 18 draft Local Plan 2024 to 2045. This consultation runs from 12pm on Friday, 17 October 2025 and will close at 5pm on Friday, 28 November 2025.

This consultation only relates to specific new or updated policies and additional site allocations. Please do not re-submit comments on areas not included in this draft or repeat feedback already provided during the previous consultation in 2024. Previous responses have already informed the development of these proposals and will continue to shape the next stage of preparing a full pre-submission version of the Local Plan (Regulation 19). We welcome new, targeted feedback on the content presented in this Regulation 18 consultation.

You can view all the relevant documents on our dedicated consultation web page: <https://www.hinckley-bosworth.gov.uk/2025reg18>. The web page also contains more details about the consultation, where hard copies can be viewed, upcoming in-person events, and how you can submit your representations to us.

If any of your contact details on this letter are inaccurate or if you no longer wish to receive updates relating to the Local Plan, please let us know via email to planningpolicy@hinckley-bosworth.gov.uk quoting your customer reference number found at the top left of this letter. Similarly, if you would rather receive this letter electronically, please let us know.

Yours faithfully

Kirstie Rea
Planning Manager
Planning Policy

To receive planning news from HBBC, including updates on planning decisions and the Local Plan, sign up to receive our planning newsletter here: www.hinckley-bosworth.gov.uk/emailupdates and click Planning News.

Appendix B: Summary of Main Issues Raised

This appendix summarises the main issues raised in representations received during the Regulation 18 consultation on the Hinckley & Bosworth Local Plan 2024–2045 (Summer/Autumn 2025). It has been prepared to accompany the Regulation 18 Consultation Report and should be read alongside the full schedule of representations and officer responses. A total of 1,029 individual comments were recorded from 710 respondents during the consultation period.

Comments are organised below by document chapter, and within each chapter by policy reference and, where relevant, by individual site allocation. Where a substantial number of representations raised materially the same point, those points have been synthesised into a single issue and the number of representations raising it has been recorded. It should be noted that a significant proportion of comments were received in materially similar or identical form as part of co-ordinated campaign responses, particularly in relation to site LPR231 (Norton Heath). Numerical totals therefore indicate the volume of representations received on a point and should not be read as a measure of the planning weight to be attached to it.

Documents covered by this appendix: the Regulation 18 Draft Local Plan; the Site Selection Methodology Paper; the Settlement Hierarchy Methodology Paper; allocations carried forward from the 2024 Regulation 18 consultation; the Settlement Boundary Review Paper; the Sustainability Appraisal Scoping Report; and other documents.

This appendix summarises the main issues raised and does not constitute the Council's response to those issues. The detailed text of every duly made representation received along with an officer response is available in Appendix C.

Table 1: Chapter 1. Consultation Overview

Policy/Section	Main Issues Raised
Consultation Process, Duration and Accessibility	Objections - The six-week consultation period was considered insufficient given the scale and complexity of the material consulted upon, which included a proposed new settlement and an extensive supporting evidence base. This was among the most frequently repeated procedural criticisms across the consultation, and was raised in over 200 comments across the Draft Plan and evidence base documents. - Respondents referred to a community petition seeking an extended consultation period, and noted that the request for an extension was declined. CPRE Leicestershire submitted a representation formally objecting to the six-week period and requesting an extension to sixteen weeks, stating its support for the petition. - Residents of parishes outside the borough boundary, and of settlements adjoining proposed allocations, stated that they had not been directly notified. Snarestone Parish Council requested formal addition to the consultee list for future stages, and

	comments were also received from residents in adjoining authority areas, including Austrey and Measham. • The consultation documentation was considered difficult to navigate, with respondents citing the number of supporting documents, the drafting style of the questionnaire and the absence of accessible formats for readers with additional needs. • Repeated statements in the consultation documents that further detail would be provided at Regulation 19 were considered to defer material information to a stage at which the opportunity for meaningful public influence would be substantially reduced. General Comments • Several respondents sought clarification of the relationship between the 2024 and 2025 Regulation 18 consultations, noting differing plan periods and differing employment land figures between the two. • Requests were made for greater clarity on how representations would be reported and how they would inform the Regulation 19 plan.
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Table 2: Chapter 5. Vision and Objectives

Policy/Section	Main Issues Raised
Plan Vision and Strategic Objectives	Support • Burbage Parish Council supported the aims and objectives set out in the Plan Vision in principle, and welcomed the commitment to champion neighbourhood planning and to support the delivery of neighbourhood plans. Objections • Respondents considered the Vision's commitment to protecting and enhancing the natural and historic environment to be in tension with the scale and location of development proposed elsewhere in the Plan, particularly in rural areas. • The Vision was considered insufficiently specific about how growth would be reconciled with the protection of rural character, and about the measurable outcomes against which delivery would be assessed. General Comments • Historic England commented that Environmental Objective 9 (Built Environment and Townscape) does not align with its content or with NPPF requirements, as it omits buried archaeology, earthworks, rural landscape features and non-designated heritage assets. A revised title was proposed: "9 Built and historic environments, including townscape and archaeology".

	Stanton-under-Bardon Parish Council sought stronger alignment between the Local Plan and the emerging Bagworth, Thornton and Stanton-under-Bardon Neighbourhood Plan, including recognition of neighbourhood plan evidence on local character, landscape, heritage, design and infrastructure.
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Table 3: Chapter 6. General Development Principles

Policy/Section	Main Issues Raised
Policy REV01: Sustainable Development	General Comments - Historic England noted that, as the Sustainability Appraisal remains at scoping stage, policies have not yet been robustly assessed against the objectives. It suggested adding a bullet to REV01 to secure explicit consideration of the historic environment, heritage assets and their settings, and indicated its position may be reconsidered once the next draft demonstrates how heritage has been addressed. - CPRE Leicestershire considered that REV01 does not adequately define what constitutes a sustainable location and does not demonstrate how development will contribute to climate change mitigation. - Several development industry respondents, including Bloor Homes, requested deletion of Policy REV01 on the grounds that it duplicates the presumption in favour of sustainable development in the NPPF.

Table 4: Chapter 7. Spatial Strategy

The Spatial Strategy chapter attracted the substantial majority of representations, with 670 comments recorded against this chapter and its associated policies.

Policy/Section	Main Issues Raised
Policy NEW01: Safeguarding Development Potential	73 comments were recorded against Policy NEW01 (68 objections, 4 general comments, 1 without a recorded stance). The majority related to the safeguarding of land in connection with the Norton Heath (LPR231) proposal. Objections • The policy is drafted in imprecise terms. 20 comments stated that the term “key infrastructure” is undefined beyond a reference to flood alleviation schemes and “other strategic infrastructure”, and that criteria (ii) and (iii) do not identify what is being protected with sufficient certainty for landowners or applicants. • The two schemes identified in the supporting text at paragraph 6.30, Nuneaton Parkway Station and the potential Hinckley Western Link Road, are not named within the policy itself. Respondents requested that, if the policy is retained, both schemes be listed in the policy wording. • Criterion (iii) is unnecessary, as allocated sites already benefit from statutory protection through their allocation in the development plan; an additional layer of policy is not justified. • 53 comments questioned the deliverability and funding of the safeguarded schemes. CPRE Leicestershire objected to the safeguarding of the A5 western link road concept and Nuneaton Parkway Station on the grounds that delivery, funding and strategic benefits remain uncertain. • The absence of draft site-specific strategic development policies, design codes and masterplanning principles for the three strategic sites identified in Policy NEW03(a) at this stage was considered a material omission. Respondents stated that such frameworks are necessary to enable informed comment on form, scale and cumulative effects on neighbouring communities including Norton Juxta Twycross, Twycross, Appleby Magna, Austrey and Measham, and requested that they be published at Regulation 19. • 62 comments raised drainage and surface water capacity in connection with the safeguarded infrastructure, and 6 raised health infrastructure, stating that access to health services should be explicitly recognised within the policy.

	General Comments • Wilson Bowden raised concerns about the proposed safeguarding approach in relation to the Hinckley Western Link Road and its interaction with employment allocations. • Comments were received noting that the sustainability of a location for growth is not solely a function of existing facilities and services, and that NPPF paragraph 110 requires a vision-led approach directing significant development to areas that are, or can be made, sustainable.
Policy NEW02: Provision of Overall Development	16 comments were recorded against Policy NEW02 (13 general comments, 3 objections). Objections • The housing figures presented in the supporting text were considered internally inconsistent and difficult to reconcile. Respondents referred to the requirement of 15,603 homes at paragraph 7.20, the 7,884 homes identified through the 2024 Regulation 18 consultation at paragraph 7.21, and the figure at paragraph 7.22, and stated that the residual requirement of 3,710 dwellings shown in Table 2 is not clearly carried through the narrative. • The scale of growth proposed was considered to exceed the identified requirement, and the justification for accommodating unmet need beyond 2036 was considered insufficiently evidenced. • The distribution of growth between settlements was questioned, including the basis on which settlement status determines the level of housing apportioned to individual villages. General Comments • National Highways emphasised the need to protect the safe and efficient operation of the Strategic Road Network (A5, M1, M69 and M42). It noted that several proposed housing and employment sites lie close to the SRN and could significantly affect capacity, safety and junction performance, including freight movements arising from large B8 allocations, which will require robust freight trip modelling and evidence on freight routing and network capacity. It stressed the importance of early engagement, comprehensive transport and freight assessments, and adherence to DfT Circular 01/2022, and referred to the relevance of planned strategic infrastructure including Nuneaton Parkway and the Hinckley Western Link Road. It supported joint working with neighbouring authorities on cross-boundary impacts. • Historic England noted that, while NEW02 includes criteria to minimise or mitigate environmental impacts for employment development, no equivalent criteria are set out for the housing

	element, and sought clarification as to whether the policy should be separated into distinct housing and employment parts with criteria for each. • Charnwood Borough Council welcomed the Council's Duty to Cooperate engagement and joint working across the Leicester and Leicestershire Housing Market Area. It supported the revised Development Strategy structure and the proposed housing requirement of 743 dwellings per annum, including Leicester City's unmet need and the 5% buffer, as consistent with the emerging Statement of Common Ground and updated HENA work, and noted that the employment land requirement (110+ hectares) is under review. • Development industry respondents requested that the housing requirement be expressed as a minimum figure and that the 5% flexibility buffer be increased, and sought confirmation of the final unmet need contribution. • Habinteg Housing Association commented that the Plan does not go far enough to secure housing provision for older and disabled people and wheelchair users, and requested strengthened accessible housing standards.
Policy NEW03: Housing Development Sites - General	604 comments were recorded against Policy NEW03 (568 objections, 17 general comments, 14 in support, with the remainder unclassified). Issues raised in respect of the policy as a whole, rather than a specific site, are summarised below; site-specific issues follow. Objections • Respondents considered the evidence base underpinning the allocations incomplete at the point of consultation. 156 comments raised the absence of a Sustainability Appraisal Environmental Report, the reliance on a SHELAA dated 2022, and the fact that supporting studies were still in preparation. • 162 comments objected to the site selection methodology, stating that it does not explain how or why specific sites were selected in preference to others in the SHELAA database, and that the methodology has not been applied transparently on a site-by-site basis. • 41 comments argued that insufficient priority has been given to brownfield and previously developed land, and that the sequential approach set out in national policy has not been demonstrably applied. • 99 comments questioned the overall housing requirement, the application of the standard method, the windfall allowance and the approach to Leicester City's unmet need, with several respondents arguing that unmet need should be met through urban regeneration rather than distributed to rural areas. • 18 comments raised affordable housing and housing mix, requesting greater provision of affordable homes, bungalows,

	accessible housing and homes for older people, and questioning whether the allocations will deliver the tenures most needed locally. General Comments - Historic England advised that the Plan must include a positive strategy for the historic environment in accordance with the NPPF, that the site selection methodology in Historic England Advice Note 3 (HEAN3) should be followed, and that comprehensive Heritage Impact Assessments should be prepared for relevant allocations. It further advised that non-designated heritage assets be assessed and that the Council's archaeological specialists be involved before sites are allocated. Historic England raised concerns that only a Sustainability Appraisal Scoping Report has been published and that no assessment of the Regulation 18 Plan has been undertaken, and considers that an Environmental Report should have accompanied the consultation to comply with the SEA/SA Regulations; it therefore regards the current Sustainability Appraisal as not legally compliant. - Natural England welcomed the Plan's green infrastructure ambitions and recommended application of its Accessible Greenspace Standards and alignment with the Environmental Improvement Plan's 15-minute access aim. For the Sustainability Appraisal, it advised referencing Natural England's Green Infrastructure Framework and the Leicestershire and Rutland Local Nature Recovery Strategies, addressing agricultural ammonia emissions within air quality considerations, linking appraisal criteria to the Nature Recovery Network, and adding a question on nature-based solutions within the climate change objectives. - Sheepy Parish Council and Newbold Verdon Parish Council sought stronger recognition of made neighbourhood plans throughout the Plan and its evidence base, and requested that housing requirements be identified for neighbourhood areas so that they may be met through neighbourhood plan reviews.
Site Allocation LPR231: Norton Heath New Settlement (Policy NEW03)	410 comments were recorded against site LPR231 under Policy NEW03 (406 objections, 1 general comment, 1 in support), together with 67 comments under Policy NEW01, 50 under Policy NEW04 and 4 under the omitted sites section. This site attracted the largest volume of representations of any element of the Plan. A high proportion of these comments were received in materially similar form. Objections 330 comments objected on the grounds of highway capacity and traffic impact, stating that the surrounding rural road network, including the A444 and B4116, is of insufficient standard to accommodate the scale of traffic generated, and

that no transport evidence or modelling was published to support the allocation.

- 311 comments raised education capacity, and 201 raised healthcare and GP capacity, stating that local provision is already at or beyond capacity and that no deliverable expansion plan has been evidenced.
- 293 comments questioned the deliverability of the allocation, including land assembly and the potential need for compulsory purchase, the absence of an identified delivery vehicle or funding strategy, and the realism of delivery assumptions within the plan period.
- 235 comments objected to the principle of a new settlement in this location, arguing that it is contrary to the established strategy of directing growth to higher-tier settlements, that the proposal amounts to a new town rather than the “three connected villages” described, and that expansion of existing settlements with infrastructure already in place would be a more sustainable alternative.
- 216 comments raised flood risk and surface water drainage, referring to Environment Agency mapping showing parts of the site within Flood Zones 2 and 3, the loss of functioning floodplain and permeable greenfield land, and increased runoff affecting Twycross Brook, the River Sence and the River Mease downstream.
- 213 comments objected on landscape and rural character grounds, including the loss of an area identified in the Landscape Character Assessment (2017) as remote and rural with dark night skies, and harm to the setting and identity of Norton Juxta Twycross and adjoining villages.
- 188 comments raised biodiversity and ecology, including the loss of mature hedgerows, veteran trees and ecological corridors, and impacts on protected and priority species.
- 143 comments objected to the loss of best and most versatile agricultural land and raised food security concerns.
- 175 comments raised procedural objections, including inadequate notification of neighbouring parishes and the absence of published cross-boundary evidence or a Statement of Common Ground with North West Leicestershire District Council.
- Natural England raised significant concerns because the site lies within the catchment of the River Mease SAC/SSSI. It advised that development must demonstrate no adverse effect on the SAC, particularly in relation to phosphorus loading and water quality; that a plan-level Habitats Regulations Assessment and a project-level HRA at application stage will be required; that any new Wastewater Treatment Works must discharge outside the SAC catchment,

supported by high-quality SuDS; and that risks relating to water abstraction and the natural flow regime require assessment. It further noted that the site contains best and most versatile agricultural land requiring detailed soil surveys, sustainable soil management and a soil handling plan. Natural England indicated that, should the site progress, it presents an opportunity to deliver an exemplar new settlement with strong green infrastructure, Biodiversity Net Gain, nature-based solutions and active travel networks.

- Severn Trent Water advised that the site cannot be served by existing wastewater treatment works, as local waterbodies including the River Mease SAC are already at environmental capacity. It advised that flows would likely need to be diverted to a different catchment, requiring a major new rising main and capacity upgrades elsewhere, and that close strategic collaboration with the Council will be essential to deliver a viable wastewater solution.
- Historic England objected on the grounds that the Plan does not demonstrate how the proposed new settlement has considered impacts on the historic environment, including the Grade II* Church of the Holy Trinity, local non-designated heritage assets, and heritage assets in North West Leicestershire including the Sir John Moore site. It considers this raises concerns as to the soundness of Policy NEW03 and compliance with the NPPF and the Planning (Listed Buildings and Conservation Areas) Act 1990.
- Sport England raised concerns regarding the adequacy of playing pitch, outdoor sport and built facility planning in the West Analysis Area, where existing provision is extremely limited. It advised that on-site facilities and off-site financial contributions will be required and that a Sports Feasibility Report should be produced, informed by the Playing Pitch and Outdoor Sports Strategy and an updated Built Sports Facilities Strategy.
- CPRE Leicestershire objected on the grounds that the location is unsustainable, that insufficient evidence has been provided, that transport and infrastructure requirements are unclear, and that there is no demonstrated funding or delivery strategy.
- Objections were received from parish councils including Appleby Magna, Twycross, Snarestone and Stoke Golding. Points raised included the characterisation of the proposal as a new town, the absence of cross-boundary evidence, harm to rural landscape and village character, the insufficiency of the consultation period, and the suggestion that expansion of an existing settlement such as Measham would be preferable.

Support

- One respondent supported the proposed new settlement, expressing a preference for new settlements over further

	estate development attached to existing towns, and considering the location favourable in strategic road transport terms. - Burbage Parish Council indicated support in principle for the Norton Heath proposal on the basis that it would reduce pressure for further housing development within Burbage. General Comments - Requests were made for the Council to publish site-specific strategic policies, design codes, phasing and infrastructure delivery frameworks for the site at Regulation 19.
Site Allocation LPR151A: Land South of Desford (Policy NEW03)	69 comments were recorded against site LPR151A (67 objections, 1 general comment, 1 in support). The site is proposed for approximately 500 dwellings. Objections 52 comments objected on highway capacity grounds, citing existing congestion on the A47 and at Desford crossroads, the constrained width of High Street and Main Street, and the additional vehicle movements associated with the allocation. 56 comments raised general infrastructure and service capacity, with 46 specifically raising school capacity and 45 raising GP and healthcare capacity. - The scale of the allocation was considered disproportionate. Respondents stated that 500 dwellings, together with 239 dwellings already approved, would increase the size of the village by approximately 30–35 per cent, and that this exceeds the level of growth proposed for other settlements within the same Key Rural Centre tier. 41 comments raised drainage and surface water flooding, and 30 raised air quality, noise and residential amenity, with requests for monitoring of road safety, air quality and noise prior to any further major development. 27 comments raised harm to the character and setting of the village, including the Desford Conservation Area designated in 1981 and the historic core of the settlement. - Desford Parish Council objected and requested removal of the allocation, citing the absence of consultation with the Parish Council prior to inclusion of the allocation, the disproportionate scale of growth for a Key Rural Centre, the substantial recent growth already accommodated by the village, and highway and traffic concerns including the proposed link road. - The Desford Neighbourhood Development Plan Group objected on the grounds of inadequate engagement prior to the inclusion of the allocation, noting the length of time invested in preparing the neighbourhood plan.

	- Historic England objected on the grounds that the Plan does not demonstrate how the 500-dwelling allocation has considered impacts on the Grade II* Manor House, the Conservation Area, or their settings, and that without clear heritage assessment the soundness of the allocation is questioned. Support - Bellway Homes strongly supported the allocation and submitted further technical evidence to demonstrate that the site is suitable, available and deliverable. It stated that the site could accommodate approximately 550–570 dwellings following further masterplanning, and could deliver a new GP surgery to address existing capacity issues, together with supporting infrastructure. General Comments - Sport England advised that the proposed allocation adjoining Bosworth Academy must comply with NPPF paragraph 193 in respect of protecting existing sports uses from the impacts of new development (the “agent of change” principle).
Site Allocation AS519: Land off Oakfield Way and Meadow Close, Sheepy Magna (Policy NEW03)	63 comments were recorded against site AS519, of which 62 were objections. The site is proposed for approximately 58 dwellings under Policy NEW03(c)(viii). Objections 55 comments objected on flood risk and drainage grounds. Respondents stated that Sheepy Magna has flooded on numerous occasions in recent years, that the junction of Meadow Close with the B4116 Main Road has become impassable during flood events, and that the site's only vehicular access would rely on that junction. Reference was made to the Sheepy Magna Flood Report and to the site's proximity to the River Sence, and it was argued that the sequential and exception tests have not been satisfied. 48 comments raised highway capacity and 11 raised road safety, including the adequacy of the single point of access and the risk to residents cut off during flood events. 35 comments objected to the loss of high-grade agricultural land, arguing that development should be directed to land of lesser quality, to urban areas, and to former quarry and mining sites where infrastructure is already in place. 29 comments raised the loss of public rights of way, recreational land and green space, and 19 raised the capacity of the existing foul drainage and sewerage system. - The allocation was stated to be contrary to Policies S3–S5 of the Sheepy Parish Neighbourhood Plan (made 2022), including the protection of locally important views approved by

	referendum, and therefore inconsistent with the development plan for the parish. 10 comments raised biodiversity and habitat loss, including reference to Policy CC01 and NPPF requirements to protect and enhance biodiversity and green infrastructure. General Comments - Sheepy Parish Council supported the principle of a new Local Plan but raised significant concerns regarding the treatment of neighbourhood planning and the proposed allocation, noting that it has commenced a review of its neighbourhood plan.
Other Housing Site Allocations (Policy NEW03)	Objections - Site LPR146 A&B, Groby (8 comments; 6 objections): objections focused on landscape character and the coalescence of Groby with adjoining settlements (6 comments), highway capacity (3), drainage and wastewater capacity (2 each), and the adequacy of consultation (2). - Site LPR181, Wood Lane, Higham-on-the-Hill (5 objections): Higham-on-the-Hill Parish Council and residents objected on the grounds that the site lies outside the village envelope and its linear form would create development isolated from the village; that Wood Lane provides an essential green corridor and buffer to the A5 Watling Street; and that highway capacity, road safety, school capacity and amenity impacts have not been addressed. - Site LPR86, Desford (6 comments; 3 objections): objections related to highway capacity, school capacity and cumulative infrastructure pressure alongside LPR151A. - Site LPR207, Newbold Verdon (2 comments): Historic England objected on the grounds that the Plan does not demonstrate how the 200-dwelling allocation has considered impacts on the Grade I Newbold Verdon Hall, the Scheduled Monument, the Conservation Area or their settings, raising concerns as to soundness and compliance with the NPPF, the 1990 Act and the Ancient Monuments and Archaeological Areas Act 1979. - Site LPR216, South of the A47, Earl Shilton (2 objections): CPRE Leicestershire objected citing cumulative development pressures, existing congestion on the A47 corridor, the absence of a credible transport solution and concerns over infrastructure delivery. - Sites LPR232, LPR241 and LPR94B: individual objections were received relating to highway capacity, landscape impact and the adequacy of the supporting evidence. Support - Site LPR86, Desford: Miller Homes supported the allocation and the approach in Policy NEW02 to meeting the Borough's full

	housing need, including a proportion of Leicester City's unmet need. • Site LPR207, Newbold Verdon: the allocation of approximately 200 dwellings was supported on the grounds that the settlement is a sustainable location, the site is accessible to services and public transport, it is free from significant technical constraints, and it is capable of early delivery, with a planning application pending consideration. • Site LPR168, Higham-on-the-Hill: promoted as suitable, available, achievable and developable for 19 dwellings, on the basis of its infill character and relationship to the existing built extent of the settlement. • Site LPR70, Land South of Jacqueline Road, Markfield: Taylor Wimpey confirmed continued support for and commitment to delivering the draft allocation, noting a planning application submitted in July 2025. • Sites LPR16A and LPR88 were each identified by three respondents as reasonable alternatives capable of contributing to housing need with fewer adverse impacts than LPR231.
Policy NEW04: Employment Development Sites	59 comments were recorded against Policy NEW04 (53 objections, 4 in support, 2 general comments). Objections • Site LPR231, Norton Heath (50 objections): objections were raised to the allocation of employment land within the proposed new settlement. 48 comments objected to the principle of employment development in this rural location; 44 raised drainage, flood risk and the River Mease SAC constraint; 40 raised wider infrastructure capacity; and 8 raised biodiversity and habitat loss. Respondents argued that the site is already constrained for housing delivery and that adding employment land compounds environmental, infrastructure and heritage issues and introduces further logistics traffic. • Historic England objected in relation to sites LPR16A, LPR241 and LPR259, on the grounds that the Plan does not demonstrate how the proposed employment allocations have considered impacts on the High Cross Scheduled Monument and Roman town, nearby scheduled bowl barrows, Wigston Parva Conservation Area and associated listed buildings, or the archaeological potential of the wider landscape associated with Watling Street. It advised that cumulative impacts between LPR16A, LPR241, LPR259 and the existing employment site require evaluation, and raised concerns as to the soundness of Policy NEW04 and compliance with the NPPF, the 1990 Act and the 1979 Act. • Concerns were raised that the employment land requirement and the strategic distribution evidence had not been finalised at the point of consultation, and that allocations should not be confirmed in advance of that evidence.

	Support • Burbage Parish Council supported the introduction of three employment sites south of the M69, strongly supporting LPR241 and supporting LPR259 and LPR16A on the basis of their proximity to the A5 and M69, subject to traffic restrictions to prevent movements through the village centre. • IM Properties Development Ltd strongly supported the allocation of LPR259 (Land East of Hinckley Park) for strategic employment and logistics development, citing the October 2025 Strategic Distribution Floorspace Needs Update and Apportionment Study as identifying a substantial requirement for strategic B8 floorspace. • The allocation of LPR16A (Land South of Soar Brook) for strategic employment and logistics development was strongly supported on the same evidential basis. • Wilson Bowden supported the allocation of Harrow and Wapping Farm for employment development, while raising concerns regarding the safeguarding approach under Policy NEW01 and the employment policy evidence base.
Policy NEW03: Omitted Sites and Alternative Site Promotions	41 comments were recorded in respect of sites not proposed for allocation (25 general comments, 10 objections, 4 in support). The majority were submitted by landowners, developers and their agents promoting alternative or additional sites. General Comments and Site Promotions • Leicestershire County Council promoted sites LPR47 and LPR48 as part of the wider Middlefield Farm, Hinckley development opportunity, for approximately 600 dwellings together with a primary school site, local centre, public open space, allotments, community orchards and green infrastructure. It stated that the sites adjoin the Borough's most sustainable settlement, are close to employment, retail and bus services, were assessed through the SHELAA as suitable, available and achievable, and that masterplanning has identified no significant heritage, landscape, flood risk or technical constraints. • Davidsons Homes promoted Land South of the A47, Hinckley (LPR188), extending to approximately 37 hectares, for around 600 dwellings with open space, green infrastructure and biodiversity enhancements, stating the land is under its control and adjoins the Main Urban Area. • Miller Homes promoted land at Ashby Road (AS1031B, approximately 17 hectares) and north of Normandy Way (LPR199, approximately 2.4 hectares) within the wider Hinckley North allocation, stating that technical and design work has identified no constraints preventing development. • Hollins Strategic Land promoted land at Kennel Lane, Witherley (AS585), following the grant of permission on the adjoining site AS586 for up to 50 dwellings. • Allison Homes promoted land off Main Street, Stanton under Bardon (approximately 0.85 hectares) for approximately 27

	dwelling, stating the site is available, suitable and deliverable within 0–5 years and is the subject of a current planning application. • Site LPR98, Newbold Verdon, was promoted on the basis that Newbold Verdon should be recognised as one of the Borough's most sustainable rural settlements and that a settlement hierarchy policy should be included in the Plan. • Bloor Homes promoted land at Groby (LPR146 A&B) and Earl Shilton (LPR200), requesting that the Settlement Hierarchy Review identify a new tier between Urban Areas and Key Rural Centres comprising Groby, Desford, Market Bosworth and Markfield. • Further promotions were received in respect of sites LPR24, LPR32, LPR41, LPR64, LPR71, LPR85, LPR126, LPR131, LPR133, LPR153, LPR182, LPR184, LPR187 A&B, LPR197, LPR254, LPR255, LPR258, LPR260 and LPR264, and sites AS392, AS543 and AS1010. Objections • Objections were raised to the promotion of additional sites at Norton Heath (4 comments), LPR144B, LPR152, LPR227 and LPR41, principally on grounds of landscape impact, highway capacity and the absence of supporting infrastructure. • Severn Trent Water's advice regarding the inability of existing wastewater treatment infrastructure to serve LPR231 was recorded against this section (see Policy NEW03, site LPR231 above).
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Table 5. Norton Heath Representation - 'You can't mitigate this' (representation from Norton Heath Development Opposition Group)

A single, very substantial representation (382 pages) was received from the Norton Heath Development Opposition Group (NHDOG), objecting to the proposed strategic allocation LPR231 at Norton Heath (c. 10,000 homes, 2,500 homes and 14 hectares of employment land within the current plan period, on approximately 700 hectares of farmland). The representation contended that the allocation is unsound, arguing that it is not positively prepared, justified, effective, or consistent with national policy. Below is an outline of the main issues raised by this representation.

Policy/Section	Main Issues Raised
Strategic choice & alternatives	Objections • Considers the council has selected one large, remote new settlement while other towns, villages and brownfield options remain under-used. • Considers evidence on reasonable alternatives to be high-level, without robust like-for-like comparison on transport, flood, carbon, infrastructure cost or delivery risk.
Duty to Cooperate	Objections

	• Duty to Cooperate material does not show a robust shared strategy with NWLDC or Warwickshire. • States NWLDC officers have advised the allocation should not proceed on the evidence available. • Considers no Statement of Common Ground has been published covering Norton Heath specifically with relevant bodies.
Farmland, food security & rural economy	Objections • Approximately 700 hectares of farmland would be lost. • Limited assessment of food security, employment or farm business resilience. • No serious testing of phased delivery or splitting growth across less productive land.
Ecology, flood risk & Mease SAC	Objections • Site drains towards Twycross Brook, River Sence and River Mease SAC; flood risk areas identified. • Phosphorus neutrality not proven and mitigation not secured for full build-out. • Reliance on future SuDS performance and off-site works.
Climate & carbon	Objections • Additional emissions and loss of carbon sinks. • Mitigation depends on future planting, technology and offsets without firm net-zero pathway.
Twycross Zoo & animal welfare	Objections • Semi-rural zoo edge becomes town edge with more traffic. • Noise, lighting, air quality and biosecurity impacts not specifically assessed or mitigated.
Transport & road safety	Objections • Significant increase in vehicle trips. • A444 and B4116 near capacity with wider network effects. • Construction traffic and road safety concerns.
Heritage, townscape & equalities	Objections • Concerns regarding heritage and townscape impacts. • Concerns regarding Equalities Impact Assessment.
Social infrastructure & public services	Objections • Requires new schools without confirmed sites/funding. • Concerns about health, police, fire and ambulance capacity. • Concerns about utilities and community facilities.
Employment land	Objections • Questions need for new employment area. • Evidence favours industrial/logistics uses.

	No assessment of trip generation, freight routing or zoo access conflicts.
Housing delivery & brownfield use	Objections - Unbuilt permissions and brownfield land exist. - Questions why these alternatives cannot be used instead.
Viability & funding risk	Objections - No transparent up-to-date viability model. - Lack of clarity on funding for major infrastructure.
Governance & transparency	Objections - Evidence base shows gaps and reliance on promoter material. - Questions transparency of contacts and declarations. - Does not allege wrongdoing.
Consultation process	Objections - Concerns about 4 Nov 2025 Twycross Village Hall event. - Council response made via local media rather than directly. - Does not allege impropriety but considers consultation inadequate.

Table 6: Chapter 8: Healthy Place Making, and Chapter 9: Leisure and Tourism

Policy/Section	Main Issues Raised
Supporting Text	General Comments - Two comments were received in respect of Chapter 9, relating to the relationship between tourism and leisure policy and the protection of the rural landscape and visitor economy assets. - Comments on healthy place making were principally made in the context of Policy NEW05 and are summarised under Chapter 6 above, together with representations from Sport England and the British Horse Society.
Policy REV02: Hot Food Takeaways	General Comments One comment was received seeking clarification of the operation of the policy and its relationship to the healthy place-making objectives of the Plan.
Policy NEW05: Open Space Provision	Objections Sport England objected to Policy NEW05, noting that although outdoor sports provision is referenced, Appendix 7 contains no mechanism, typology definition or standards for outdoor sport. It advised that NEW05(p) does not align with NPPF paragraph 104 on playing field protection, and suggested clarifying that outdoor sports facilities fall within Policy NEW06 and adding a dedicated

	outdoor sports typology and standards (for example the Playing Pitch Calculator or 1.6ha per 1,000 population), together with requirements for ancillary facilities. Sport England also advised that the Indoor Sports Facilities Assessment is out of date and requires updating. • Objection was raised to the Plan's reliance on the Open Space Assessment (September 2025), on the grounds that the assessment contains errors and omissions (particularly in respect of Groby), treats spaces straddling parish boundaries inconsistently, uses unclear typologies and thresholds, and provides insufficient mapping. It was argued that limited weight should be given to the assessment unless improved before the next stage. • Concern was raised that the policy's provision for replacement of open space with equivalent or better provision elsewhere, and the reference to space potentially being surplus to requirements, conflicts with the accessibility needs of rural communities and with the healthy place-making objectives in Chapter 8. General Comments • A request was made for the supporting text to clarify the relationship between the open space requirement and National Forest planting requirements on sites within the National Forest, noting the potential for overlap only where public open space has a strong focus on trees and woodland creation. • The British Horse Society requested that the Plan protect and enhance public rights of way and equestrian access in accordance with NPPF paragraph 105, including opportunities to add links to the existing network. •
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Table 7: Supporting Evidence Base: Settlement Hierarchy Methodology Paper

Policy/Section	Main Issues Raised
Main Document	55 comments were recorded against the Settlement Hierarchy Methodology Paper (53 objections, 2 general comments). A high proportion were received in materially similar form. Objections • 55 comments objected that the paper presents a methodology but does not apply it. Respondents contrasted this with the 2021 Settlement Hierarchy Review, in which the Council both updated the methodology and applied it to rank each settlement, and stated that without worked examples the public cannot assess whether the proposed approach reflects local circumstances or how it would influence the distribution of development.

- 42 comments objected to the deferral of the application of the methodology to Regulation 19, on the grounds that the Regulation 19 plan is the version intended for submission and that deferral therefore limits the opportunity for meaningful public influence.
- 52 comments objected to the methodology itself, including that several components rely on qualitative officer judgement (Table 3 and paragraphs 3.7, 3.8, 4.1 and 5.3) without published criteria, and that the proposal to sub-divide the “Rural Village” tier lacks clear thresholds.
- 48 comments stated that the paper is vague or internally inconsistent, suggesting continuity with the existing strategy of directing growth to higher-tier settlements while indicating that lower tiers may receive development, without explaining the basis for such a shift.
- 33 comments considered that, in the absence of applied results, the Plan cannot be demonstrated to be justified or based on proportionate evidence.
- CPRE Leicestershire objected that the methodology does not adequately consider sustainability, access to employment, transport, facilities or infrastructure delivery.
- Bagworth and Thornton Parish Council requested the introduction of an additional tier to recognise rural villages with higher populations but limited services, citing Bagworth as an example, and stated that development in such locations is not sustainable.

General Comments

- Historic England raised no concerns with the settlement hierarchy methodology but stressed that the next iteration of the Plan, the Sustainability Appraisal, or a dedicated topic paper must clearly demonstrate how impacts on the historic environment have been considered, including in relation to any additional allocations arising from the hierarchy review. It indicated that it will reconsider its position as the Plan and evidence base develop.
- Comments were received noting that sustainability is not solely a function of existing services and facilities, and that access to employment and the potential for locations to be made sustainable through a vision-led approach to transport should carry weight in the hierarchy.

Table 8: Supporting Evidence Base: Site Selection Methodology Paper

Policy/Section	Main Issues Raised
Main Document	60 comments were recorded against the Site Selection Methodology Paper, all of which were registered as objections. Objections 60 comments objected that the paper provides only a high-level methodology and does not explain how or why specific sites were selected in preference to others in the SHELAA database. Respondents stated that, without the application of the methodology being set out for each site, the rationale for the Council's decisions cannot be understood or tested. 48 comments objected that the SHELAA relied upon dates from 2022 and is therefore out of date; while paragraph 3.5 notes that it is being updated, the updated assessment was not available to inform the consultation. 58 comments raised procedural concerns, including that the Local Plan has been in preparation since 2018 and that the absence of an applied site selection assessment at this stage constrains meaningful engagement. 48 comments questioned the deliverability and availability evidence underpinning the selected sites, including the absence of published infrastructure, transport and viability evidence. - CPRE Leicestershire objected that the site selection process fails to identify the most sustainable locations and is overly influenced by the call-for-sites process rather than by positive plan-making. 6 comments raised landscape and character impacts, 4 raised biodiversity, 3 raised heritage and 2 raised flood risk in connection with the application of the selection criteria.

Table 9: Supporting Evidence Base: Settlement Boundary Review Paper

Policy/Section	Main Issues Raised
Supporting Text	Support - Burbage Parish Council welcomed the Settlement Boundary review, particularly in light of the extent of development within the parish since the previous review in 2013. General Comments - A comment was received on the settlement boundary methodology, together with a request for specific amendments to a defined boundary.

Table 10: Supporting Evidence Base: Sustainability Appraisal

Policy/Section	Main Issues Raised
Main Document	Objections and General Comments • Historic England considers that the Sustainability Appraisal is not legally compliant, on the grounds that only a Scoping Report has been published and no assessment of the Regulation 18 Plan has been undertaken, notwithstanding that the draft Plan contains both policies and site allocations. It advised that an Environmental Report should have accompanied the consultation to comply with the SEA/SA Regulations, and that the assessment of impacts on the historic environment is insufficient. • CPRE Leicestershire considered the evidence base incomplete, inconsistent and insufficiently robust to support the proposed strategy and allocations, citing missing evidence, unfinished studies and uncertainty regarding information still in preparation for Regulation 19. • Natural England recommended that the Sustainability Appraisal reference its Green Infrastructure Framework and the Leicestershire and Rutland Local Nature Recovery Strategies, address agricultural ammonia emissions within air quality considerations, link appraisal criteria to the Nature Recovery Network, and include a question on nature-based solutions within the climate change objectives. • Historic England requested that Environmental Objective 9 be revised to encompass buried archaeology, earthworks, rural landscape features and non-designated heritage assets.

Table 11: Allocations Carried Forward from the 2024 Regulation 18 Consultation

43 comments were recorded in respect of sites and policies consulted upon at the 2024 Regulation 18 stage and carried forward into the current draft Plan (27 objections, 8 general comments, 5 in support).

Policy/Section	Main Issues Raised
Site LPR95: Copt Oak Employment Site, Markfield	23 comments were recorded against site LPR95, of which 20 were objections. Objections • Objections were raised on landscape sensitivity grounds, with respondents citing the Charnwood Forest Landscape Character

	Assessment (2019), which describes the Ulverscroft Wooded Valley Landscape Character Area as a peaceful, upland, heavily wooded landscape with a strong sense of tranquillity, maturity and heritage value. It was argued that large-scale B2/B8 development in this location is fundamentally incompatible with that character and with the elevated, long-distance views from the site. • A representation submitted on behalf of approximately 1,525 local residents under the banner “Save Ulverscroft's Nature” objected to the identification of LPR95 as a potential employment allocation and to the associated planning application for a logistics park, citing conflict with adopted Core Strategy Policies 21 and 22 and related site allocation policy. • Objections raised the absence of a sustainable or accessible location for strategic employment growth, and stated that more sustainable alternatives exist within the Borough with better accessibility and infrastructure capacity. • Further objections raised highway capacity, biodiversity and habitat impacts, air quality, noise, and the effect on the setting of Charnwood Forest and the National Forest.
Other Carried-Forward Sites	Support and General Comments • Support was expressed for the continued allocation of sites LPR70 (Markfield), LPR199 and AS1031B (Hinckley North), LPR200 (Earl Shilton) and LPR22 (Hinckley), principally by site promoters confirming deliverability and, in several cases, the submission of planning applications. • Comments were received on sites AS58, LPR107, LPR125 and LPR235A relating to deliverability, infrastructure provision and boundary definition. Objections • Objections to carried-forward sites principally raised highway capacity (25 comments), landscape character and coalescence (23), the scale and location of employment land (22), biodiversity (19) and cumulative infrastructure pressure (19).

Table 12: Cross-Cutting Issues

Policy/Section	Main Issues Raised
Cross-Cutting Issues	The following issues were raised consistently across multiple chapters, policies and sites and are recorded here to avoid repetition. Objections • Infrastructure capacity and phasing: 372 comments across the Plan raised the capacity of services and utilities generally,

385 raised education capacity and 258 raised healthcare and GP capacity, with the recurring theme that infrastructure delivery has not been evidenced, funded or phased alongside proposed growth.

- Highway capacity and the absence of published transport evidence: 452 comments raised traffic and highway capacity; respondents repeatedly noted that no transport assessment or modelling accompanied the consultation.
- Flood risk and drainage: 322 comments raised flooding, surface water and drainage capacity.
- Landscape, rural character and settlement coalescence: 268 comments.
- Biodiversity and ecology, including Biodiversity Net Gain: 227 comments.
- Loss of best and most versatile agricultural land and food security: 188 comments.
- Heritage and archaeology: 144 comments, with Historic England raising formal objections in respect of five allocations.
- Adequacy and timeliness of the evidence base, and the soundness tests in NPPF paragraph 36: 156 comments.
- Climate change, carbon reduction and sustainable design: 68 comments, including requests for stronger requirements on energy efficiency, renewable energy and electric vehicle charging.

Appendix C: Detailed Consultation Responses

See separate document.