



Hinckley & Bosworth
Borough Council

LOCAL PLAN 2020-204 REGULATION 18 CONSULTATION REPORT (2024)

REGULATION 18 CONSULTATION REPORT

31 JULY TO 27 SEPTEMBER 2024; HINCKLEY AND BOSOWRTH BOROUGH COUNCIL

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1. Executive Summary

- 1.1. The Regulation 18 consultation on the Hinckley & Bosworth Local Plan (2020–2041), was held between 31 July and 27 September 2024. The consultation generated 774 responses and over 1,500 individual representations.
- 1.2. Feedback showed strong support for the Plan’s emphasis on sustainable development, an urban-focused growth strategy, and addressing Leicester’s unmet housing need.
- 1.3. However, significant concerns were raised about the deliverability of large strategic sites, infrastructure capacity, particularly along the A5 corridor and reliance on outdated evidence. Respondents called for clearer affordable housing policies, greater flexibility through smaller site allocations, and a robust Infrastructure Delivery Plan before Regulation 19.
- 1.4. While climate change and green infrastructure policies were welcomed, issues of duplication with building regulations and viability testing were highlighted.
- 1.5. Objections focused on Market Bosworth’s classification as a District Centre, gaps in tourism strategy, and transport modelling deficiencies.
- 1.6. Overall, the consultation confirmed broad support for the Plan’s vision but emphasized the need for updated evidence, contingency planning, and stronger infrastructure commitments to ensure the Local Plan is positively prepared, justified, effective, and legally compliant.

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 2041. The plan:

- Identifies land and areas for development for a broad range of uses;
- Identifies areas that should be conserved or enhanced and where future development should be carefully managed;
- Sets clear policies that guide decisions on planning applications; and
- Indicates how the Plan will be delivered, including infrastructure, and how progress will be monitored.

2.2. The development plan is at the heart of the planning system with a requirement established in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. The Plan sets out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well-designed places. It is essential that plans are in place and kept up to date.

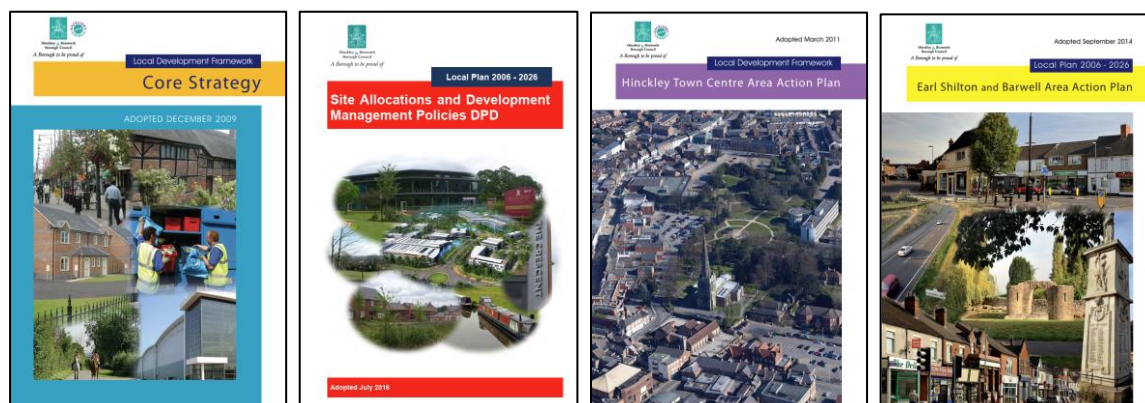
2.3. The Local Plan will replace the following Development Plan Documents:

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

2.4. The following Area Action Plans (AAP) will be saved to support the applications for the Barwell and Earl Shilton Sustainable Urban Extensions (SUEs) and the preparation of a new Hinckley Town Centre Masterplan.

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

Figure 1. Local Plan 2006-2026



2.5. The Regulation 18 consultation represents a formal stage in the preparation of the Hinckley & Bosworth Borough Council Local Plan 2020–2041. Its purpose is to gather comments on emerging strategic sites (greater than 500 dwellings or greater than 1 ha

employment), 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.

- 2.6. 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.
- 2.7. 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.
- 2.8. The Council consulted on a further Regulation 18 draft of the new Local Plan which built upon previous consultation stages, incorporating feedback received and reflecting new evidence gathered since those earlier exercises. A Sustainability Appraisal was published alongside the draft Plan to assess its potential social, environmental, and economic impacts. This represented the initial stage of the appraisal process, which will be updated at each subsequent stage to ensure sustainability considerations inform the development of the Plan. The appraisal supported the plan-making process but did not itself determine policy.
- 2.9. A further Regulation 18 consultation was considered necessary, as emerging evidence indicated that the previously consulted spatial strategy might not be deliverable. In addition, changes to national planning policy had occurred, and the position regarding Leicester City Council's unmet housing and employment needs had been finalised.

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.

Informal Consultation and Duty to Cooperate

- 3.2. Under the National Planning Policy Framework, local planning authorities and two-tier county councils are legally required to cooperate with each other and with prescribed statutory bodies on strategic matters that cross administrative boundaries, such as housing, infrastructure, and environmental protection.
- 3.3. To fulfil this requirement, HBBC engaged in ongoing, constructive dialogue with neighbouring authorities across Leicestershire and Warwickshire, as well as with statutory organisations. This collaborative work helped address cross-boundary issues and develop a robust shared evidence base.
- 3.4. Key outcomes of this cooperation include:
- Shared ownership of the Leicester & Leicestershire Strategic Growth Plan, which sets a long-term regional vision;
 - The joint preparation of evidence base documents, such as housing need assessments, infrastructure capacity studies, and strategic flood risk assessments.
 - The establishment of Memoranda of Understanding (MoUs) to formalise shared commitments and planning principles.
 - Collaborative work on Statements of Common Ground, which document the strategic matters being addressed and the progress made in resolving them.
 - Cross-boundary working groups such as Coventry, Solihull & Warwickshire Association of Planning Officers Group (CSWAPO), Leicestershire Task and Finish Group.
- 3.5. This informal cooperation underpinned the preparation of the Regulation 18 draft and continues into Regulation 19. A formal Duty to Cooperate Statement is planned for publication alongside the Regulation 19 submission to document transparent and effective joint working.
- 3.6. In addition to external stakeholder working groups the Planning Policy Team held informal discussions with Council departments: green spaces, built & natural environment, climate change, housing, economic development, environmental health, and infrastructure, to ensure the Local Plan reflects a fully integrated and deliverable strategy.
- 3.7. The Planning Policy team worked closely with Development Management officers to ensure that proposed policies and site allocations were informed by practical experience and local knowledge of planning applications, appeals, and development trends. This collaboration helped refine policy wording, assess deliverability, and ensure consistency between the Local Plan and day-to-day decision-making processes.
- 3.8. The Local Plan Member Working Group also plays a vital role in supporting the development of the Local Plan. It is a non-decision-making cross-party forum

established to keep elected members informed and engaged in planning policy matters, including the preparation of the Local Plan and related strategic documents. The group provides a platform for members to review and discuss draft evidence base documents, Local Plan policies, and Neighbourhood Development Plans at early stages, offering informal feedback to guide officers in shaping formal proposals.

Regulation 18 Consultation

- 3.9. The Local Plan Regulation 18 consultation was conducted from Wednesday 31 July to Friday 27 September 2024. The Council carried out the consultation in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and in line with its adopted Statement of Community Involvement, which sets out how the Council will engage with residents, businesses, and other stakeholders during the plan-making process.
- 3.10. 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.

Figure 2. Local Plan 2020-2041 Front Cover



Direct Notification

- 3.11. 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.
- 3.12. Consultation letters/emails notifying of the scope and date of consultation, illustrating how to make a representation and the date to be received were directly sent 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.
- 3.13. Where a record of an email address exists on the database the consultation notification letter has been sent via that medium unless otherwise stated.
- 3.14. 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
- 3.15. 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.
- 3.16. A copy of the consultation notification letter can be viewed in Appendix A.

Borough Council's Website

- 3.17. 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

- 3.18. 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.

- 3.19. Appendix A includes examples of social media posts which were used during the consultation.

Press Release

- 3.20. A press release was issued to formally announce the launch of the Regulation 18 consultation for the Hinckley & Bosworth Borough Council Local Plan 2020–2041. 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

- 3.21. 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 2024 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

- 3.22. Four articles were published in the Borough Council's Resident E-Newsletter, which was distributed via email to all subscribers on 31 July, 14 August, 28 August and 12 September 2024. These articles provided information about the Regulation 18 consultation, including details of the draft Local Plan and upcoming engagement events. Copies of two of the articles are included in Appendix A.

Posters

- 3.23. 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

- 3.24. 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.
- 3.25. 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.

3.26. The following in-person events took place:

- Newbold Verdon Library – Thursday, 15 August 2024, 4:00–7:00pm
- Ratby Methodist Church, Station Road – Thursday, 22 August 2024, 4:00–7:00pm
- Earl Shilton Library – Thursday, 29 August 2.00-5.00pm
- Hollycroft School, Hinckley – Wednesday, 4 September 2024, 4:00–7:00pm
- Higham on the Hill Methodist Church – Wednesday, 4 September 2024, 4:00–7:00pm
- The Black Horse, Market Bosworth – Saturday, 14 September 2024, 10:00am–12:30pm
- Millennium Hall, Burbage – Saturday, 14 September 2024, 2:00–4:30pm
- Hinckley Hub, Hinckley – Wednesday, 18 September 2024, 4:00–7:00pm

3.27. In addition to the in-person events, a virtual consultation session was held via Microsoft Teams on Wednesday 18 September 2024, between 4:00–7:00pm. This online event required advance booking to secure a time slot and receive access details.

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.

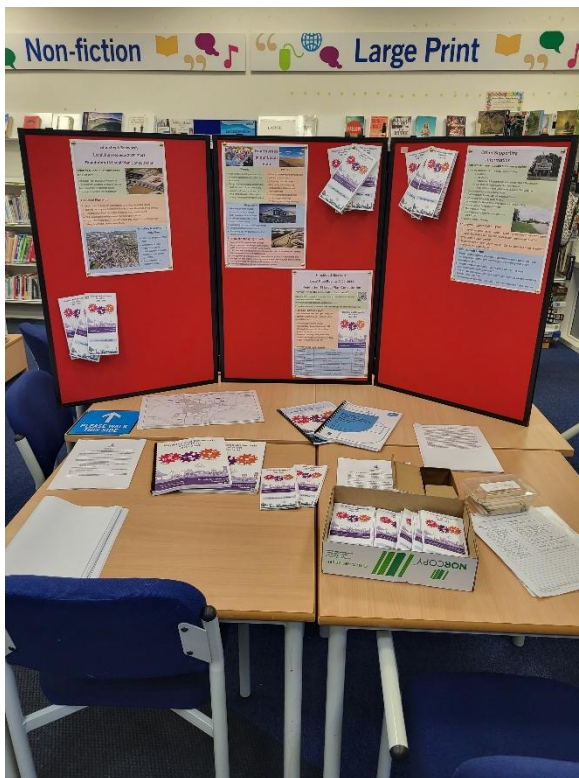
Figure 3. Consultation events at Earl Shilton, Ratby and Hinckley.



Document Availability

- 3.29. To ensure accessibility, consultation documents were made available through multiple formats. Copies of the Regulation 18 Local Plan were made available on the Council's 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.

Figure 4. Consultation Event set up at Newbold Verdon Library and Hollycroft School, Hinckley



4. Overview of the Consultation Responses

- 4.1. The Local Plan Regulation 18 consultation received 774 responses within the consultation period. A further 12 consultation responses were received late and outside of the consultation period. Representations received during the formal consultation period equated to 1,553 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).

Local Plan Overview and Plan Period

- 4.4. Respondents expressed concerns about the reliance on outdated evidence and called for a robust, up-to-date policy framework. There were strong requests for flexibility to respond to unforeseen events (e.g., COVID-19) and clearer differentiation between strategic and non-strategic policies. Comments highlighted the need to revise the Strategic Growth Plan (SGP) and improve policy numbering and structure. While some supported the inclusion of the SGP and efforts to address Leicester's unmet housing need, objections focused on the proposed plan period (2020–2041) being too short or misaligned with adoption timelines, legal compliance with NPPF paragraph 22, and perceived lack of community empowerment.

Spatial Portrait

- 4.5. Feedback emphasised the need for more comprehensive and accurate supporting text. Suggestions included referencing key assets such as Groby Pool (SSSI), Hinckley Leisure Centre, and Market Bosworth as tourism destinations. Respondents called for improved clarity on demographics, benchmarking against OECD countries, and inclusion of commuting statistics. Concerns were raised about the impact of development on rural identity, heritage, and community spirit, particularly in Market Bosworth.

Vision and Objectives

- 4.6. General support was noted for the vision's emphasis on sustainable development and urban focus, but many felt the wording was verbose and lacked clarity. Key themes included better alignment with spatial strategy, addressing housing affordability, infrastructure needs, and climate change. Respondents requested clearer terminology (e.g., "green growth"), stronger aspirational language, and recognition of rural growth needs. Objections related to overdevelopment in Market Bosworth and specific objectives lacking ambition or clarity. Support was expressed by Historic England and the Environment Agency for cultural heritage and sustainability references.

Spatial Strategy

- 4.7. Policy SP01 (Sustainable Development) attracted comments about alignment with the NPPF, particularly paragraph 11, and concerns over wording that could undermine the presumption in favour of sustainable development. SP02 (Development Strategy) drew mixed views: support for urban focus and hybrid strategies, but objections to over-reliance on large strategic sites (Barwell and Earl Shilton SUEs), lack of flexibility, and insufficient allocations in sustainable rural centres. Deliverability, infrastructure capacity, and contingency planning were recurring issues. Strategic site policies (SP03 and SP04) faced criticism for viability, transport, flood risk, and heritage impacts, with doubts about housing delivery rates and infrastructure provision.

Climate Change

- 4.8. Policies SP05 to SP07 were broadly supported for addressing climate change, flood risk, and renewable energy, but concerns included duplication of building regulations, lack of clarity, and viability testing. Respondents urged stronger integration of green infrastructure, biodiversity, and circular economy principles. Objections targeted requirements for Sustainability Statements and water efficiency standards without robust evidence. Calls were made to update outdated renewable energy studies and ensure alignment with national guidance.

Place Making and Design

- 4.9. SP08 (High Quality Design) received support for promoting active design and green infrastructure but faced objections over vague wording, mandatory requirements (e.g., tree-lined streets), and potential conflicts with highway adoption standards. SP10 (Preventing Pollution) and SP11 (Health and Well-being) were welcomed in principle, though respondents sought clearer terminology, proportionate Health Impact Assessment requirements, and stronger links to national guidance.

Housing to Meet Different Needs

- 4.10. Comments highlighted gaps in affordable housing policy and housing mix requirements. Respondents stressed the need for clarity, viability testing, and alignment with the Housing Needs Study (April 2024). There were calls for policies supporting custom and self-build housing and better integration of transport and accessibility considerations.

Economic Prosperity

- 4.11. Support was expressed for employment growth and the MIRA Enterprise Zone, but concerns focused on future-proofing policies, addressing skills gaps, and balancing employment land allocations with housing provision. Infrastructure constraints, particularly along the A5 corridor, were a major theme. Some objected to over-allocation of employment land and lack of clarity on strategic B8 requirements.

Town Centres and Tourism

- 4.12. Respondents welcomed flexibility for mixed-use development and regeneration in town centres but raised objections to Market Bosworth's classification as a District Centre, citing inadequate facilities and infrastructure. There were strong calls to recognize Market Bosworth as a heritage and tourism destination and to broaden the tourism strategy beyond Twycross Zoo.

Natural Environment

- 4.13. Policies on green and blue infrastructure, biodiversity, and countryside protection were supported in principle but criticized for duplication, lack of clarity, and exceeding national standards without viability evidence. Respondents emphasized the need for measurable targets, integration with Local Nature Recovery Strategies, and recognition of cultural heritage assets. Concerns were raised about Green Wedge boundaries acting as de facto Green Belt and restricting sustainable development.

Transport and Infrastructure

- 4.14. Transport policies were supported for promoting sustainable travel, but objections highlighted severe capacity issues on the A5 corridor, reliance on outdated traffic models, and lack of clear mitigation measures. Infrastructure delivery and funding were recurring concerns, with calls for a robust Infrastructure Delivery Plan before Regulation 19 consultation. Respondents stressed the need for cross-boundary collaboration and early engagement with utility providers.

Evidence Base and Sustainability Appraisal

- 4.15. Significant concerns were raised about the completeness and currency of the evidence base, including housing need figures, transport modelling, flood risk assessments, and viability studies. The Sustainability Appraisal was criticized for failing to test reasonable alternatives or appraise the draft plan against SA objectives, raising risks of legal non-compliance and unsoundness.

Specific Sites

- 4.16. Representations on specific sites under Policy SP02 raised a mix of support and objections, primarily focused on deliverability, infrastructure, and compliance with strategic policies. For Earl Shilton and Barwell SUEs, concerns were expressed about long-standing delivery challenges, unresolved transport issues, and viability risks due to cost inflation. While some support continued allocation, others questioned reliance on these sites given historic delays. Additional strategic land south of the A47 was proposed, but objections cited coalescence risks with Elmesthorpe, outdated green wedge reviews, and lack of site-specific policies.
- 4.17. For Hinckley North (Normandy Way and Middlefield Farm), strong support was noted for strategic allocations, citing sustainability, availability, and deliverability, with promoters highlighting advanced planning stages and infrastructure benefits. However, objections focused on unresolved traffic impacts on the A5 corridor and doubts about achieving housing numbers within the plan period.
- 4.18. Other site-specific comments included Higham on the Hill, where smaller-scale growth was supported for meeting local needs, and Market Bosworth, where objections highlighted lack of public transport, heritage concerns, and excessive housing numbers compared to local need. Employment allocations such as Hinckley LPR22 and Markfield LPR95 attracted support for job creation and strategic location but faced objections over A5 capacity, flood risk, and landscape impacts. Across all sites, recurring themes included safeguarding minerals and waste facilities, flood risk mitigation, and heritage considerations.
- 4.19. The proposed allocation for around 450 to 475 dwellings at Ratby raised mixed views. Supporters, including Lagan Homes, highlighted the site's sustainability, Flood Zone 1 status, biodiversity net gain potential, and infrastructure benefits such as a new primary school and community hub. Transport assessments indicate safe access and good bus links to Leicester. Objections focused on infrastructure capacity, citing congested roads, full schools, overstretched healthcare, and utilities. Environmental concerns included loss of greenfield land, flood risk, and harm to heritage assets such as Ratby Camp and the Conservation Area. Community representations raised fears of overdevelopment, village coalescence, and policy conflicts, noting Ratby's recent rapid growth and lack of cumulative impact assessment.

Omitted Sites

- 4.20. Representations promoting omitted sites emphasised their suitability, availability, and deliverability within five years, arguing that inclusion would improve flexibility and early housing delivery. Sites in Bagworth, Barlestone, Barwell, Burbage, Desford, Earl Shilton, Groby, Newbold Verdon, Stoke Golding, Thornton, and Witherley were highlighted as logical extensions to existing settlements, often supported by technical evidence and

masterplans. Promoters stressed alignment with the spatial strategy, sustainable locations, and ability to address Leicester's unmet housing need. Common benefits cited included provision of affordable housing, biodiversity net gain, green infrastructure, and community facilities such as schools, healthcare, and play areas. Several representations criticized heavy reliance on large strategic sites, advocating for a balanced approach with smaller sites to ensure quicker delivery and resilience against delays. Objections to their omission focused on soundness risks, arguing that failure to allocate these sites undermines housing supply and flexibility. Employment-related omissions (e.g., Markfield LPR32) were also raised, with promoters providing evidence of market demand and technical feasibility. Overall, omitted site representations sought to demonstrate compliance with NPPF principles, deliverability within the plan period, and contribution to a robust housing trajectory.

- 4.21. The Regulation 18 consultation highlighted a broad spectrum of views. Overall, there was strong support for the Local Plan's emphasis on sustainable development principles, an urban-focused growth strategy, and the commitment to addressing Leicester's unmet housing need. However, concerns were raised regarding the deliverability of strategic sites, infrastructure capacity, reliance on outdated evidence, and the absence of robust contingency planning. In addition, objections focused on over-reliance on large sites, misclassification of settlements within the spatial hierarchy, insufficient clarity on affordable housing policy, and notable gaps in the recognition of tourism and heritage assets.

Appendix A: Copies of Consultation Material

Figure 5: Screenshot of social media post on Instagram - 6 August 2024



Figure 6: Screenshot of social media post on LinkedIn - 7 August 2024



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



The infographic features a yellow background with a diagonal split. At the top, a black-outlined speech bubble contains the text 'Local Plan Consultation' in bold and 'Have your say' below it. Below this, two event locations are listed in bold black text, separated by a horizontal line. To the right of the second event, there are two stylized speech bubbles, one red and one pink, each containing three white dots. At the bottom, a teal banner contains contact information and the council's name.

Local Plan Consultation
Have your say

The Black Horse, Market Bosworth
Saturday 14 September
10am to 12:30pm

Millennium Hall, Burbage
Saturday 14 September
2pm to 4:30pm

Your opportunity to meet members of the Policy Planning Team to discuss future development in Hinckley and Bosworth up to 2041.

To find out more about the plan visit hinckley-bosworth.gov.uk/reg18

Hinckley & Bosworth
Borough Council

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

Eight-week consultation to begin on local plans

We will soon be holding an eight-week consultation, starting on 31 July and running until 27 September, on the Regulation 18 Local Plan.

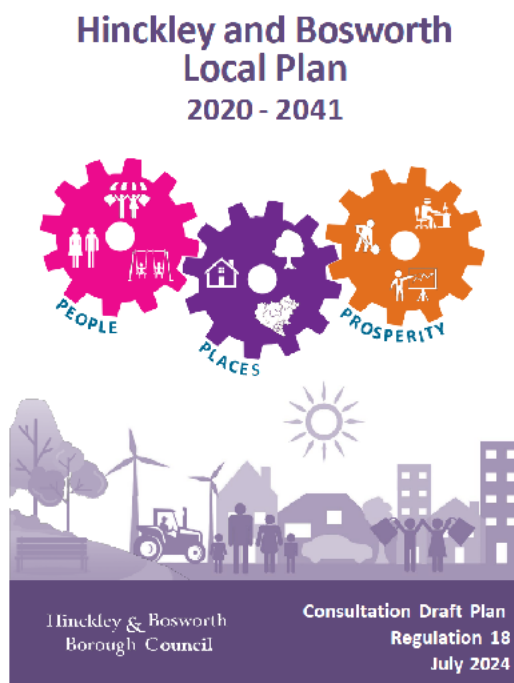
This plan will guide future development in Hinckley and Bosworth up to 2041. It sets out a preferred strategy for housing and economic growth and includes policies covering a range of issues such as conserving and enhancing the natural and historic environment, sustainable transport and development, good design and responding to the challenges of climate change.

The policies will be used to guide development and respond to economic, environmental and social issues within the borough, and we very much encourage all residents to have their say on issues that are important to them.

There will be a series of in-person consultation events, which will take place in locations throughout the borough in August and September, as well as an opportunity to comment via the council's website

Keep an eye on our website for updates and consultation dates: [Local Plan review](#), or [sign up for planning news updates](#) from the planning team.

Figure 9: Poster distributed to Parish Councils



The Hinckley and Bosworth Borough Council Local Plan Regulation 18

Consultation starts from 9am Wednesday 31 July through to 5pm Friday 27 September 2024

If you would like more information, please see our website

www.hinckley-bosworth.gov.uk/localplanreview

Figure 10: Copy of Resident E-Newsletter Article - 31 July 2024

Local Plan consultation goes live

Residents, community groups, local businesses, and others with an interest in the borough are invited to give their views on the new Hinckley and Bosworth Local Plan in a consultation which is open until 5pm on 27 September 2024.

The Local Plan is the key planning document for the borough that will guide future development in Hinckley and Bosworth up to 2041. The Plan sets out where and how housing and economic growth should take place and includes a range of development sites.

Hinckley and Bosworth Local Plan 2020 - 2041

Have your say and tell us what you think



To get involved and have your say, you can use [this online consultation form](#) on the Borough Council website.

Figure 11: Copy of Resident E-Newsletter Article - 28 August 2024

Local Plan consultations continue

If you would like to share your views about the local plan, there are still plenty of opportunities to come and speak to members of the Planning Policy Team.

- Earl Shilton Library, Thursday 29 August 2024, 2pm to 5pm
- Hollycroft School, Greenfinch Road, Hinckley, Wednesday 4 September 2024, 4pm to 7pm
- Higham on the Hill Methodist Church, Tuesday 10 September 2024, 4pm to 7pm
- The Black Horse, Market Bosworth, Saturday 14 September 2024, 10am to 12:30pm
- Millennium Hall, Burbage, Saturday 14 September 2024, 2pm to 4:30pm
- Hinckley Hub, Hinckley, Wednesday 18 September 2024, 4pm to 7pm

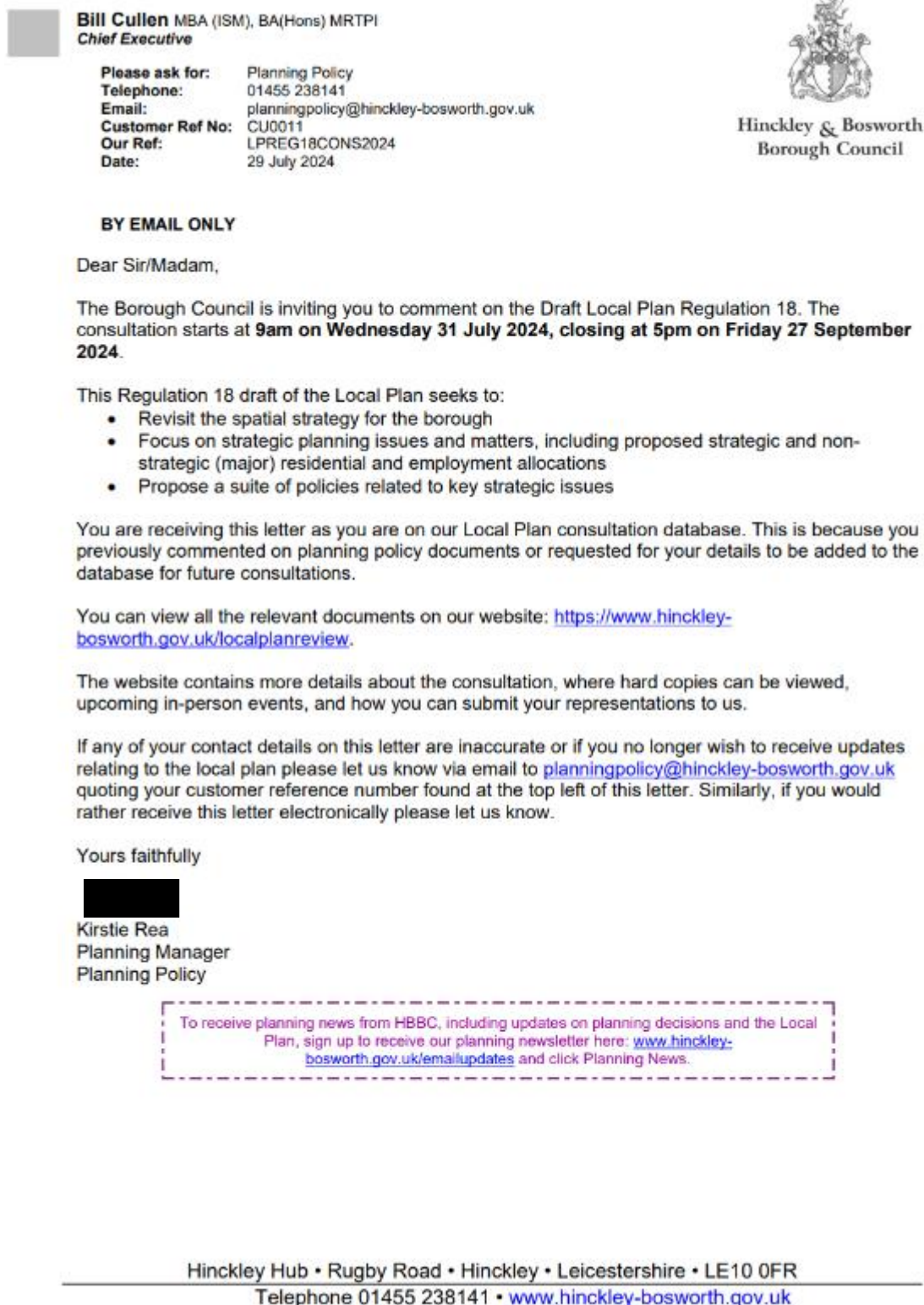
Officers will also be available via Microsoft Teams on Wednesday 18 September 2024 between 4pm to 7pm. Please [contact Planning Policy to book](#) one of our 10-minute individual slots.

Hinckley and Bosworth Local Plan 2020 - 2041

Have your say and tell us what you think



Figure 12: Copy of the direct notification letter which was issued via email or post



Appendix B: Summary of Main Issues Raised

Table 1: Chapter 1. What is the Local Plan and Plan Period

Policy/Section	Main Issues Raised
Supporting Text	General Comments - Concerns about outdated evidence and the need for a robust, up-to-date policy framework. - Calls for flexibility in the Plan to respond to unforeseen events (e.g. COVID-19). - Suggestions to clarify strategic vs non-strategic policies. - Comments on the Strategic Growth Plan (SGP) being outdated and needing revision. - Requests for clearer differentiation in policy numbering and structure. - Observations on the need to reflect Neighbourhood Plans more consistently. Support - Endorsement of the Strategic Growth Plan's inclusion. - Support for the development of Neighbourhood Plans. - Recognition of the Council's efforts to address Leicester's unmet housing need. Objections - Criticism of the proposed plan period (2020–2041) as too short or misaligned with adoption timelines. - Concerns about legal compliance with NPPF paragraph 22. - Objections to the perceived lack of empowerment for local communities. - Challenges to the accessibility and clarity of the consultation documents. - Disagreement with the classification of Market Bosworth as a district centre.

Table 2: Chapter 2. Spatial Portrait

Policy/Section	Main Issues Raised
Supporting text	General Comments Groby Pool (borough's largest water body and an SSSI) should be mentioned.

	• Crescent and Hinckley Leisure Centre developments have overshadowed smaller retail offerings; planning policies should allow flexibility to avoid vacancy and social issues. • Suggested rewording of paragraph 2.9 for clarity and accuracy regarding age demographics and parish references. • Benchmarking should consider comparisons with OECD countries. • Ageing population presents challenges suggest breaking down economic inactivity by age; add Triumph Visitor Centre and Market Bosworth as key attractions; reference inequalities in life expectancy. • Include travel-to-work statistics to understand commuting patterns and transport modes. Objections: • Paragraph 2.12 misrepresents the impact of development on rural identity and community spirit, especially in Market Bosworth. Concerns raised about profit-driven development, loss of heritage, traffic, and community disempowerment.
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Table 3: Chapter 3. Vision and Objectives

Policy/Section	Main Issues Raised
Para 3.5 - Vision	Support • Harrow supports the vision, especially the focus on urban areas like Barwell and the ambition for sustainable growth. • Several representations express general support for the vision's emphasis on sustainable development and urban focus, while noting the need for realistic implementation. General Comments • Multiple comments suggest the vision is too verbose and lacks clarity. • Concerns about over-reliance on the Council's Corporate Plan for long-term planning. • Calls for better alignment between the vision and spatial strategy. • Suggestions to include unmet housing needs from Leicester City. • Requests for clearer terminology (e.g., "green growth") and more aspirational language.

	• Emphasis on the need for rural growth, especially in places like Desford and Barlestone. • Suggestions to revise the vision to reflect challenges like housing affordability, infrastructure needs, and climate change.
Paragraph 3.6	Support • Harrow supports early development in Barwell, citing benefits like infrastructure delivery, housing variety, and biodiversity net gain.
Paragraph 3.7	General Comments • Suggestions to improve air quality and noise pollution mitigation. • Preference for “increase biodiversity” over “protect biodiversity.” • Comments on climate change mitigation, tree cover, and offsetting development impacts. • Criticism of vague terms like “townscape” and preference for “streetscape.” • Calls for succinct and aspirational plans.
General	General Comments • Support for solar PV and battery installation in new developments. • Emphasis on reducing carbon emissions beyond tree planting. • Importance of access to green spaces for health and well-being. • Recognition of the Ashby Canal’s role in health, tourism, transport, and biodiversity. • Suggestions to strengthen references to the Midlands Engine and Strategic Growth Plan. • Need for cross-boundary infrastructure planning. Objections • Concerns about overdevelopment in Market Bosworth and its impact on community and tourism. • Objection to Lindley Meadows allocation due to poor sustainability.

- Objections to specific objectives (e.g., Objective 1, 2, 6, 7, 8, 9, 13) for lacking clarity, ambition, or appropriate terminology.

Support

- Historic England supports the vision's recognition of historic and cultural assets.
- Environment Agency supports the emphasis on sustainable development and carbon reduction.

Table 4: Chapter 4. Spatial Strategy

Policy/Section	Main Issues Raised
SP01 Sustainable Development	General Comments • SP01 is broadly in line with current national planning policy but does not reflect emerging changes in the draft NPPF. • There's a high likelihood the draft NPPF will be adopted, so SP01 should be reviewed accordingly. • Suggestion to revise SP01 wording to align with the NPPF to avoid it becoming outdated. • Policy should mirror NPPF paragraph 11 to prevent misapplication by decision-makers. • Concerns about the phrase “unless material considerations indicate otherwise” conflicting with the NPPF’s presumption. • Recommendation to revise SP01 to reflect updated NPPF provisions, especially paragraph 11. • Some suggest removing replication of NPPF altogether due to frequent changes. • Affordable housing in rural areas is critical; rural affordability issues highlighted using Rural Services Network data. • Suggestion to include legal duty under Planning Act 2004 to mitigate climate change in policy justification. Support • Support for SP01’s alignment with development plan policies and its role in facilitating housing growth. • Positive feedback on SP01’s continuation from previous policy DM1. • Recognition that SP01 helps avoid unnecessary delays in development approvals. • Seen as reflecting NPPF aspirations to boost housing supply. Objections • Repeated objections to SP01’s wording diverging from NPPF paragraph 11. • “Material considerations” clause seen as undermining the presumption in favour of sustainable development.

	• Second paragraph wording deviates from NPPF's criteria for out-of-date policies. • Recommendation to either delete SP01 or revise it to refer to the latest NPPF version. • Criticism of NPPF's practical application favouring short-term economic gains over long-term sustainability. • Reference to Strategic Growth Plan (SGP) as incompatible with climate goals. • Suggestion to include a net zero policy (SP0) to meet legal climate obligations.
SP02 Development Strategy	General Comment • Lychgate Lane site in Burbage should be allocated; policy SP02 lacks flexibility for small urban sites. • FP McCann requests flexibility for rural employment expansion. • Preference for brownfield development over countryside loss. • Clarification needed on annual housing target and Leicester's unmet need. • Suggestion to add a 10% flexibility allowance to housing provision. • County Council supports urban focus but wants clearer sub-area strategy and more strategic allocations. • Sport England recommends feasibility studies for on-site and off-site sports provision. • Calls for clearer definitions and contingency in housing supply. • Support for hybrid spatial strategy balancing urban and rural growth. • Suggestions to increase allocations in Key Rural Centres to support vitality and sustainability. • Concerns about lack of infrastructure and environmental assessments for proposed sites. • Calls for more deliverable sites and reduced reliance on large strategic allocations. • Requests for inclusion of Wood Farm site in employment land supply figures. Support

- Carlton Parish Council supports concentrating development near transport links and urban centres.
- WPC supports large-scale allocations near urban areas for better infrastructure delivery and sustainability.
- Horiba MIRA supports Lindley Meadows development if integrated with MIRA Technology Park.
- General agreement that development should be directed to sustainable locations.
- Support for the housing provision figure (13,862 homes) and its alignment with the Statement of Common Ground.

Objection

- Redrow objects to the omission of Burbage from new allocations despite its sustainability credentials.
- Concerns about lack of evidence for site selection and spatial strategy, contrary to NPPF paragraph 31.
- Objections to over-reliance on strategic sites (e.g., Barwell and Earl Shilton SUEs) with poor delivery history.
- Calls for more allocations in Burbage and Key Rural Centres to balance growth.
- Objections to lack of flexibility in employment land allocations and unclear definitions of “general” vs “strategic” employment.
- Historic England objects due to lack of heritage impact assessments and site selection methodology.
- Concerns about transport infrastructure capacity, especially around the A5 corridor.
- Objections to the housing target being too low given proposed changes to the Standard Method (suggested increase to 820 dpa).
- Objections to lack of safeguarded land and contingency planning for housing delivery failures.
- Objections to the exclusion of self-build and custom-build housing options.
- Concerns about misleading site naming (e.g., Field Head being labelled as Markfield).
- Objections to development in countryside without exception for previously developed land.
- Objections to lack of clarity on housing distribution and sub-area strategy.

	- Concerns about environmental constraints and lack of infrastructure planning. - Objections to excessive development in areas like Market Bosworth and Markfield. - Objections to lack of consideration for strategic warehousing and employment needs.
SP03 Strategic Site: Earl Shilton SUE	General Comments - Lack of Public Transport: Noted absence of public transport infrastructure. - Green Infrastructure & Biodiversity: Natural England advises early integration of green infrastructure and biodiversity net gain into masterplans. - Viability & Deliverability Concerns: No up-to-date evidence supporting viability of infrastructure requirements; concerns about audit trail for site selection. - Equestrian Access: Suggests inclusion of horse-riding infrastructure in sustainable travel plans; references NPPF and parliamentary statements. - Historic Environment: Lack of assessment of impacts on heritage assets like Earl Shilton Motte and Bailey Castle and Church of St. Simon and St. Jude; recommends using HEAN 3 guidance. - Employment Land Viability: Questions whether small employment allocations will be delivered given residential developer dominance; suggests alternative site at Desford. - Over-Reliance on Undelivered Sites: Notes failure of SUEs to deliver homes over 9 years; recommends diversifying site allocations. - Housing Market Saturation: Concerns about feasibility of delivering large housing numbers within plan period; risk of market saturation. - Flood Risk: Southern border of site lies within Flood Zones 2 and 3; requires NPPF-compliant Flood Risk Assessment. - Waste Infrastructure: County Council requests engagement on future capacity at Household Waste and Recycling Centres. - Absorption Capacity: Questions rationale for allocating additional land south of A47 given slow progress of existing SUE; recommends contingency sites. Objections

	• Secondary School Provision: No feasible plan for secondary education infrastructure for additional SUE; undermines sustainability claims. • Transport Infrastructure: Significant unassessed transport impacts; reliance on congested routes and uncertain Rail Freight Terminal. • Employment Land Double Counting: Unclear whether employment land is counted twice; needs clarification. • Policy Ineffectiveness: Long planning history with little progress; unclear infrastructure delivery; risks to affordable housing due to viability issues. • Unrealistic Housing Delivery: Planning permission not yet granted; average build-out rates suggest only ~800 homes deliverable by 2041, not 1582 as claimed.
SP04 Strategic Site: Barwell SUE	General Comments • Natural England advises early integration of Green Infrastructure and Biodiversity Net Gain into masterplans. • Equestrian access should be included in sustainable travel infrastructure to avoid safety issues; horse riding is part of Active Travel. • Historic England notes lack of assessment of impacts on heritage assets (e.g. Church of St. Martin at Stapleton); recommends using HEAN 3 guidance. • Flood Risk: Western edge of site lies in Flood Zones 2 and 3; requires NPPF-compliant Flood Risk Assessment. • Employment Land Viability: Questions whether small employment allocations (5.3ha and 6.2ha) will be delivered due to residential developer dominance. • Alternative Site Promotion: Desford site proposed as a more viable mixed-use alternative. • Delivery History: SUEs have failed to deliver homes over 9 years; concerns about continued reliance on undeliverable sites. • Viability Issues: Increasing reliance on S106 for affordable housing may worsen viability. • Housing Market Trends: National slowdown in completions and house price inflation raises doubts about delivery confidence.

- Public Rights of Way: NPPF requires enhancement of access; upgrading footpaths could benefit cyclists and equestrians.
- Green Space Conflicts: Fees for residents in green spaces may cause tension with public access.
- Infrastructure Evidence: Lack of up-to-date viability evidence for infrastructure requirements.
- Housing Delivery Rates: Lichfields report suggests average build-out rates of 101 dpa; council's target of 130 dpa is unrealistic.
- Lead-in Times: Earliest delivery unlikely before 2028; council's own Housing Delivery Test Action Plan confirms delays.
- Strategic Dependence: Over-reliance on SUEs for 3,001 of 13,862 homes is considered unsound.
- Alternative Site Promotion: Bellway promotes land south of Bosworth Academy as a more deliverable option.

Objections

- No Public Transport: Site lacks adequate public transport provision.
- Land Ownership Conflict: Poors Platt Charity objects to inclusion of privately owned allotments in the plan.
- Planning History: No detailed permission granted in 10 years; concerns about viability and deliverability.
- Minerals Safeguarding Area: Site lies in area for sand & gravel; unresolved legal and infrastructure issues.
- Double Counting: Employment land figures may be duplicated; clarification needed.
- Housing Delivery Unrealistic: 1,420 homes expected by 2041 is overly optimistic; build-out rates suggest only ~750 homes feasible.
- Traffic Impact: Narrow roads in Barwell may not support increased traffic; concerns about bus service viability.
- Infrastructure Clarity: SSIS lacks detail on infrastructure costs and delivery; undermines credibility of SUE.
- Transport Modelling: Additional modelling needed before mitigation schemes can be confirmed; delays S106 agreements.
- Market Saturation: Risk of oversupply in Earl Shilton area; may slow sales and delivery.

	Waste Infrastructure: County Council raises concerns about capacity at Household Waste and Recycling Centres.
Supporting Text	General Comments - Employment Land vs Housing Balance: Multiple comments question whether the housing provision aligns with the scale of employment land allocated (109.25ha), suggesting a potential mismatch that could lead to unsustainable commuting patterns. - Infrastructure and Growth: Strategic infrastructure improvements (e.g. A5 corridor) may require more housing to support funding and delivery. - Evidence Base Concerns: Lack of cross-referencing to evidence supporting housing conclusions; concerns about outdated or incomplete studies. - Affordable Housing Viability: Questions over whether affordable housing needs are truly accounted for; viability concerns due to competing developer contributions. - Transport Evidence Gaps: Local Highway Authority (LHA) highlights absence of comprehensive transport evidence and potential impacts on strategic road networks. - Spatial Hierarchy Clarity: Suggestions to revise settlement categories (e.g. Groby and Ratby as 'Edge of Leicester Urban Area') and better align with Strategic Growth Plan. - Duplication and Clarity: Chapter 4 criticised for excessive repetition, unclear figures (e.g. housing targets), and lack of succinctness. - Duty to Cooperate: Emphasis on cross-boundary collaboration with neighbouring council's (e.g. Staffordshire, Derbyshire). - Strategic Growth Plan Alignment: Charnwood Borough Council welcomes reference to the SGP but suggests stronger integration. - Deliverability and Absorption Capacity: Concerns about over-reliance on large strategic sites (e.g. Earl Shilton SUE) and market absorption limits. - Contingency Planning: Recommendation to include reserve sites to mitigate delivery risks. Support - Urban Focus Endorsed: Harrow supports directing development to sustainable urban areas, especially

	Barwell, citing access to services and regeneration potential. • Balanced Growth Strategy: General support for a strategy that includes urban areas and proportionate growth in rural centres. • Infrastructure and Services: Recognition that urban areas offer better infrastructure and service delivery opportunities. Objections • Housing vs Employment Imbalance: Objections to the lack of housing uplift despite significant employment land allocations. • Flooding and Sustainability: Local concerns about increased flooding due to new housing developments. • Transport and Commuting: Fears that insufficient housing will lead to unsustainable commuting patterns. • Strategic Site Viability: Doubts about the deliverability of strategic sites like Earl Shilton and Barwell SUEs, given past delays and infrastructure challenges. • Affordable Housing Delivery: Objections to the assumption that affordable housing needs are fully met within the existing housing requirement. • Infrastructure Funding: Concerns that without higher housing numbers, critical infrastructure improvements (e.g. A5 corridor) may not be financially viable.
Table 1: Hinckley & Bosworth Local Plan Housing Provision (2020–2041)	General Comments • Affordable Housing Need: Multiple representations highlight a significant shortfall in affordable housing delivery compared to identified need (430 dwellings/year). Concerns that the standard method does not adequately account for affordable housing needs. Calls for an uplift in housing targets to enable more affordable housing delivery. • Housing Requirement and Standard Method: Widespread concern that the current housing requirement (660 dpa) is insufficient given proposed changes to the standard method (raising LHN to 689 dpa). Suggestions to increase housing targets to reflect new national policy direction and ensure flexibility. • Housing Supply and Delivery Risks: Over-reliance on large strategic sites (e.g. Barwell and Earl Shilton SUEs) with poor delivery history. Recommendations for a buffer (10–20%) to account for non-implementation and delays. Calls

for more small and medium-sized site allocations to improve deliverability and resilience.

- **Spatial Strategy and Site Selection:** Criticism of the plan's focus on strategic urban extensions and lack of allocations in sustainable urban areas like Burbage and Desford. Suggestions to diversify site types and locations to support infrastructure and services.
- **Policy Clarity and Evidence Base:** Requests for clearer explanation of housing figures and apportionment of Leicester's unmet need. Need for a housing trajectory and more robust evidence on deliverability and viability. Concerns about the lack of review triggers and contingency planning.
- **National Policy Alignment:** Multiple reps reference the July 2024 Written Ministerial Statement and draft NPPF revisions, urging the Council to plan for higher housing delivery. Emphasis on the need to reflect economic growth, infrastructure investment, and unmet needs from Leicester.

Support

- **Proactive Planning:** Support for HBBC's decision to plan for 13,862 dwellings, including Leicester's unmet need. Recognition of the Council's intention to exceed the standard method figure.
- **Alignment with SoCG:** North West Leicestershire District Council supports HBBC's commitment to the Statement of Common Ground (SoCG) and acknowledges the need to adapt to future changes.

Objections

- **Insufficient Flexibility:** Objections to the lack of contingency in the housing supply. Criticism of reliance on strategic sites with slow delivery and infrastructure challenges.
- **Underestimation of Need:** Objections to the assumption that affordable housing need is fully captured in the LHN. Calls for a higher housing requirement to meet both local and Leicester's unmet needs.
- **Delivery Concerns:** Doubts about the realism of build-out rates and delivery timelines for strategic sites. Concerns that the plan does not provide enough short-term deliverable sites.
- **Economic Growth and Infrastructure:** Objections that the plan does not adequately consider the Borough's economic potential and infrastructure needs. Calls for housing targets

	to reflect employment land allocations and strategic transport improvements.
Table 2: Hinckley & Bosworth Settlement Hierarchy	General Comments • Settlement Hierarchy Logic: Broad support for the logical structure of the hierarchy, with Hinckley at the top due to its infrastructure and services. Recognition of Key Rural Centres as important service hubs for surrounding rural areas. • Concerns About Existing Hierarchy: Some argue the current hierarchy is outdated and doesn't reflect changes in settlement roles (e.g. Market Bosworth's shift to a tourism-based economy). Suggestions to create new categories like "Heritage and Tourism Destination" for unique settlements. • Infrastructure Capacity & Growth Viability: Infrastructure studies highlight that growth in Key Rural Centres must be either large enough to justify infrastructure investment or small enough to fit existing capacity. Newbold Verdon and Markfield identified as capable of accommodating further growth with manageable infrastructure upgrades. • Functional Links to Leicester: Several comments stress the importance of recognising settlements like Desford, Groby, Ratby, and Markfield as having strong functional ties to Leicester. Suggestion to reinstate the "Key Rural Centres Relating to Leicester" classification or create a new tier for these settlements. • Settlement-Specific Observations: Stoke Golding is well-placed for modest growth due to existing infrastructure and services. Groby's growth has outpaced infrastructure provision, raising concerns about sustainability. Support • Endorsement of Settlement Hierarchy: Multiple respondents support the hierarchy as a sound basis for spatial strategy and site selection. Hinckley's role as the most sustainable location is widely supported. • Support for Specific Settlements: Market Bosworth, Markfield, Desford, and Stoke Golding are seen as appropriate Key Rural Centres capable of sustainable development. Support for allocating more housing to these areas due to their infrastructure and service levels. • Strategic Growth Distribution: Support for directing growth to both urban areas and Key Rural Centres to maintain vitality and ensure balanced development. Recognition of

	the need for a varied portfolio of housing sites to support delivery throughout the plan period. Objections • Hierarchy Fit for Purpose: One representation argues the settlement hierarchy is outdated and maintains the status quo without addressing infrastructure gaps. Suggests a more dynamic strategy with master-planned expansions and caps on village sizes.
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Table 5: Chapter 5. Climate Change

Policy/Section	Main Issues Raised
SP05 Mitigating and Adapting to Climate Change	General Comments • Policy Scope and Clarity: Several respondents support the principle of SP05 but caution against duplicating building regulations in planning policy. Calls for clearer wording and alignment with existing regulations and standards. • Green Infrastructure and Biodiversity: Natural England supports the policy's focus on carbon capture and habitat connectivity but recommends explicit reference to Green Infrastructure (GI) for resilience and air quality benefits. • Circular Economy and Waste Management: Support for inclusion of circular economy principles and waste design. Suggestions to strengthen wording around waste prevention and hierarchy during construction and occupation. • Heritage and Climate Adaptation: Historic England welcomes references to retrofitting heritage assets and provides links to relevant guidance. • Transport and Active Travel: Ashby Canal highlighted as a potential contributor to active travel and heating/cooling systems. Stoke Golding's proximity to bus routes seen as an opportunity to support modal shift. • Tree Canopy and Urban Cooling: Support for increasing tree cover to reduce urban overheating; suggestion to revise wording for clarity. Support • Policy Intent and Detail: Strong support for the inclusion of SP05 and its detailed bullet points. Specific endorsement of bullet points promoting tree canopy cover and habitat connectivity. Objections

	• Sustainability Statement Requirement: Multiple objections to the requirement for a Sustainability Statement with every planning application. Concerns about added cost, complexity, and overlap with existing building regulations. • Policy Structure and Duplication: Criticism that SP05 lacks clarity, replicates other policies, and lacks measurable standards. Suggestion to restructure SP05 as a set of objectives rather than a standalone policy. • Policy Placement and Relevance: Objection to inclusion of certain bullet points (e.g. n and q) that are seen as unrelated to climate change or better suited to other policies. • Viability and Evidence Base: Concerns about lack of a viability assessment to support policy requirements. Reference to national guidance discouraging local standards that exceed building regulations without robust justification. • Legal and Strategic Alignment: Objection that SP05 does not fully reflect the legal duty to mitigate climate change. Reference to national reports and guidance calling for systemic planning reform and stronger climate alignment.
SP06 Flood Risk	General Comments • Flood Risk Management Scope: Multiple comments highlight the need for SP06 to address all sources of flooding, including fluvial, groundwater, surface water, and reservoir flooding. Suggestions to amend the policy wording to explicitly include climate change impacts in the Sequential Test and flood risk assessments. • Site-Specific Concerns: Concerns raised about the impact of large developments, such as Lindley Meadows, on downstream flood risk, particularly in Witherley. Questions were raised about whether developers are required to improve river infrastructure to mitigate increased flood risk. • Policy Structure and Clarity: Recommendation to rewrite SP06 more concisely using bullet points or numbered criteria. Suggestion to include non-statutory recommendations from the HBBC Strategic Flood Risk Assessment (SFRA) to strengthen policy weight. • Sustainable Drainage and Infrastructure: Support for including SuDS, greenfield runoff rate limits, and culvert daylighting in the policy. Emphasis on long-term maintenance and adoption of drainage systems. • Ashby Canal Considerations: Canal and River Trust suggests including canal discharge feasibility in Sustainability Statements for nearby developments. Notes that discharges to the canal require commercial agreements and are not guaranteed.

	• River Corridor and Biodiversity Enhancements: Proposals to include river corridor protection measures such as naturalising urban watercourses, avoiding development over culverts, providing easements and space for future flood management, and preserving riverbank buffers for habitat and maintenance access. • Sequential Test Application: Clarification requested on when the Sequential Test applies and how climate change should be factored into its assessment. Support • Policy Detail and Intent: Support for the policy’s emphasis on reducing and managing surface water. Appreciation for the inclusion of climate change considerations and detailed supporting commentary. Objections • Groundwater Flooding Omission: Objection that SP06 focuses only on surface water and omits groundwater flood risk, which should be explicitly included. • Realism of Surface Water Discharge Assumptions: Concerns that assumptions about maintaining current discharge levels are unrealistic for large developments like Lindley Meadows. • Downstream Impact and Developer Responsibility: Questions about whether developers are required to improve river infrastructure to mitigate increased flood risk downstream.
SP07 Renewable and Low Carbon Energy	General Comments • Policy Support and Refinement: The Environment Agency supports the inclusion of SP07 and recommends refining bullet point ‘a)’ to ensure comprehensive mitigation of adverse impacts (e.g. landscape, air, land, water, noise, visual, cumulative). Emphasis on technologies that: Consider environmental risks early. Minimise impacts to people and the environment. Are resilient to climate change. • Outdated Evidence Base: Multiple comments note that the 2014 Renewable Energy Capacity Study is outdated and does not reflect current technology or energy needs. Suggestion to update the study to reflect advancements in renewable energy and the transition to electricity for heating and transport. • Opportunities for Waste-Based Energy: Recommendation to include decentralised energy opportunities in the policy, particularly where waste sites could supply heat, energy, or steam.

	- Local Area Energy Plan: Support for the reference to the Local Area Energy Plan for Leicestershire, which is expected to contribute significantly to net zero delivery. - Planning-Led Approach: Support for enabling commercial renewable energy schemes to be assessed solely on planning criteria. Recognition that the policy provides a clear framework for renewable energy development. Objections - Outdated Study and Technology Bias: Objection to reliance on the 2014 Energy Capacity Study; request for HBBC to update it. - WPC objects to wind turbines and requests that alternative renewable options be investigated.
Supporting Text	General Comments - Terminology and Classification: A respondent noted that Groby and Ratby should not be classified as 'urban areas', suggesting a need for more accurate settlement categorisation in the supporting text. Support - Whole Plan Approach: Support for the recognition that climate change adaptation and mitigation measures are integrated throughout the local plan policies, reflecting a comprehensive and consistent approach. Objections - Misplaced Content: Objection to the inclusion of references to a “healthy and biodiverse environment” in paragraph 5.1, arguing that this content belongs in Section 11 (biodiversity) rather than Section 5 (climate change). - Flood Risk and Community Engagement: Concerns raised in relation to paragraphs 5.7–5.8: Need for more detail on risks associated with culverted watercourses, especially under climate change pressures. Specific mention of fluvial flood risk from the River Tweed in Sibson. Recommendation for the Borough Council to commit to working with communities and agencies (e.g. Parish Councils) to develop flood-related public initiatives and improve communication with affected areas.

Table 6: Chapter 6. Place Making

Policy/Section	Main Issues Raised
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SP08 High Quality Design

General Comments

- Environmental and Climate Considerations: The Environment Agency supports the policy but recommends amending bullet point 'a)' to include broader environmental impacts (e.g. landscape, air, land, water, noise, visual, cumulative). Suggestions to include carbon reduction strategies such as the energy hierarchy, water cycle, and waste hierarchy.
- Green and Blue Infrastructure: Natural England supports the inclusion of green and blue infrastructure and recommends referencing the 2023 Green Infrastructure Planning and Design Guide.
- Waste and Recycling: Support for integrating recycling and waste management into design, with suggestions to include kerbside collection, waste separation, and minimisation.
- Active Design and Healthy Communities: Endorsement of active design principles to promote physical and mental health. Recommendation to reference Sport England's "Active Design" guidance and clarify the link to Policy SP09.
- Design Clarity and Application: Requests to revise wording for clarity, especially around: Design and Access Statement requirements (suggest limiting to major or heritage-sensitive developments). Ambiguity in terms like "visual intrusion". Condensing verbose criteria for ease of application.
- Neighbourhood Plans and Local Identity: Suggestion to reference design guides from made Neighbourhood Plans (e.g. Sheepy). Encouragement to incorporate local heritage into public realm improvements to foster community identity.
- Equestrian and Multi-User Routes: Recommendation to use appropriate signage and environmentally sound materials on shared routes. Reference to Highway Code and DMRB guidance for inclusive design.
- Ashby Canal Integration: Suggestion to reference the Ashby Canal as a multifunctional asset for design, recreation, and active travel.
- National Forest Character: Recommendation to include reference to National Forest character either as a standalone criterion or within existing design principles.

Support

	• General Endorsement: Multiple respondents support the overall intent and structure of SP08, recognising its alignment with national policy and NPPF paragraph 35(d). National Highways supports the emphasis on active and sustainable travel as part of high-quality design. Lagan Homes supports the policy and confirms its criteria are achievable on proposed sites. Objections • Policy Precision and Deliverability: Concerns about vague and imprecise wording leading to subjective interpretation. Objection to the requirement for Design Statements for all developments; seen as exceeding national policy. Criticism of the mandatory tree-lined street requirement due to adoption issues with the Highway Authority (LCC). • Suggestion to move some elements to supplementary guidance (e.g. Good Design Guide SPD) for better clarity and flexibility.
SP10 Preventing Pollution	General Comments • Nutrient Neutrality and River Mease: Natural England welcomes reference to nutrient neutrality but clarifies it is a methodology, not a legal requirement. Suggests rewording to focus on avoiding adverse effects rather than “achieving nutrient neutrality”. • Agent of Change Principle: Recommendation to include the NPPF’s ‘agent of change’ principle to protect existing minerals and waste sites from sensitive new uses. • Terminology and Scope: Requests clarification of vague terms like “contribute positively” in part a). Suggests expanding part c) to include a wider range of pollutants (e.g. dust, odour). Recommends part g) include human health impacts alongside environmental concerns. • Ashby Canal Protection: The Canal & River Trust supports the policy’s reference to tranquillity and noise impacts near the canal. Emphasises the need to assess impacts on wildlife, users, and infrastructure. Recommends acknowledging construction-related land instability risks to canal structures. Support • Land Instability: The Coal Authority supports the inclusion of land instability considerations and welcomes signposting to their expertise in paragraph 6.15. Objections

	• Policy Wording and Consistency: Jelson and others object to several parts of SP10 as imprecise, onerous, and inconsistent with national policy: Part b) on nutrient neutrality. Part d) on light pollution and the missing Light Zone Map. Part e) on tranquillity lacks clear identification of affected areas. Part f) lacks evidence and clarity. Part g) is repetitive and inconsistent with NPPF flood risk guidance. • Mapping and Evidence Base: Objection to part d) requiring a Landscape and Visual Impact Assessment without the supporting Environmental Zones Map being available. Considered contrary to NPPF paragraph 16(d) which requires clear and unambiguous policies.
SP11 Health and Well-being	General Comments • Policy Support and Scope: Broad support for including a dedicated chapter on health and well-being in the Local Plan. Recognition that health is a cross-cutting issue relevant to all chapters and should be referenced throughout the plan. • Health Impact Assessments (HIAs): Support for requiring HIAs for major developments but calls for clarity on what constitutes “major development” and when HIAs are triggered. Leicestershire County Council is undertaking a full HIA and working with Hinckley & Bosworth BC to inform planning policy. Suggestions to allow for proportionate HIAs (e.g. “HIA light” for smaller sites) and screening processes to determine necessity. • Green Infrastructure and Active Design: Natural England recommends cross-referencing SP20 (Green Infrastructure) to highlight health benefits of nature access. Sport England supports the use of Active Design principles to promote physical activity and well-being. Calls to reference national guidance and case studies on active environments. • Funding and Delivery: Support for using s106 contributions to fund health-related infrastructure and services. • Policy Alignment and Interpretation: PPG guidance suggests HIAs are useful where significant impacts are expected, but not always necessary if development aligns with Local Plan policies. Recommendation to clarify policy wording to ensure consistency with national guidance and avoid ambiguity. Support

	- Policy Intent: General support for the policy's aim to promote mental and physical health and reduce health inequalities. Endorsement of integrating health considerations into planning and design processes. Objections - Policy Clarity and Justification: Objection that SP11 is ambiguous and lacks clear criteria for assessing health impacts. Recommendation to revise wording to align with Paragraphs 16 and 96 of the NPPF for clarity and decision-making. - HIA Requirement Concerns: Objections to a blanket requirement for HIAs on all major developments. Suggestions to limit HIA requirements to residential schemes or allow alternative assessments for employment and commercial uses. Concerns that HIAs duplicate other policy requirements and may not effectively address health priorities. - Threshold and Viability: Recommendation to raise the threshold for requiring HIAs (e.g. only for developments over 100 dwellings). Criticism that HIAs may not be the most effective tool for delivering health outcomes compared to other planning policies.
Supporting Text	General Comments - Private Streets and Maintenance: Concern raised about residential developments with private streets lacking long-term maintenance strategies, which could lead to future issues. - Air Quality Terminology: Corrections suggested for terminology: "fine particular matter" should be "fine particulate matter". - Nutrient Neutrality and Water Pollution: Recommendation to integrate nutrient neutrality content (paras 6.16–6.22) into the water pollution section due to its relevance to water quality and ecological health. Environment Agency should be explicitly referenced alongside the Coal Authority and potentially Public Health England. - Water Framework Directive (WFD): Suggestion to update references to WFD Regulations post-Brexit and include groundwater. Clarification needed on the use of GSPZs vs. Drinking Water Protected Areas (DWPAs). Linkages to SP24 should be made clearer. - Soil Protection and BMV Land: Reiteration of previous advice to include a policy on protecting soils and best and

	most versatile agricultural land (Grades 1, 2, 3a), in line with NPPF paragraph 174. • Transport and Active Travel: Local Highway Authority (LHA) highlights funding limitations for maintaining non-standard design elements (e.g. street furniture, trees). Suggests requiring a long-term maintenance strategy for such features. Recommends strengthening the language around EV charging points to reflect their importance as essential infrastructure. Suggests extending the policy’s scope beyond residential developments to include employment and visitor-generating uses. Recommends referencing the Government’s “Gear Change” vision and Cycle Design Guidance (LTN 1/20). Support • Air Quality Policy Update: Natural England acknowledges the inclusion of ammonia in the air quality policy as a positive response to previous feedback. • Health Impact Assessments: Support for requiring Health Impact Assessments for all major developments (para 6.47), though minor text corrections are needed. Objections • Terminology and Structure: Objection to the use of “fine particular matter” and “particular matter” – should be corrected to “particulate matter”.
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Table 7: Chapter 7. Housing to meet different needs

Policy/Section	Main Issues Raised
SP13 Gypsies, Travellers and Travelling Show people	General Comments • Evidence Preparation: New evidence is being prepared to support the emerging Local Plan. This is welcomed, but there is no detail to comment on yet. • Accommodation Assessment & Policy Clarity: Hinckley and Bosworth BC is working with the Multi-Agency Traveller Unit on a 2024 Gypsy and Traveller Accommodation Assessment to replace the outdated 2016 study. Clearer wording is sought for Transit pitches to ensure any identified need is met by local authority Transit sites. Health

	inequalities for Gypsy and Traveller populations noted in the 2023 JSNA. Minerals and waste safeguarding should be considered to avoid amenity issues and resource sterilisation. Policy should broaden to include all groups mentioned in NPPF paragraph 63. - Supply and Monitoring: Draft plan states sufficient supply of pitches for 2024–29; additional needs will be met on windfall sites via Policy SP13. A call for sites will occur if required. HBBC encouraged to allocate specific sites where possible. Objection - Provision Increase Questioned: Concern raised about increasing provision for a reducing population. Belief that there are already ample provisions locally, and these should not be extended further.
Supporting Text	General Comments - Transport Advice & Policy Suggestions: Appendix B contains previous transport advice for consideration.: Threshold for active travel infrastructure should not apply to passive provision (e.g., safeguarding land for future infrastructure), even for developments under 10 dwellings.: Suggested amendment to Policy HO04: clarify exceptions for good design and essential infrastructure. - Concerns about “pepper potting” accessible dwellings; recommend locating them near public transport routes or clustering for efficiency in transport and social care services. Affordable housing exemptions: need clarity on funding and delivery of transport infrastructure if exemptions are applied. - Custom and Self-Build Housing: Plan should include a policy supporting custom and self-build housing in line with the Self-build and Custom Housebuilding Act 2015 and NPPF guidance. Objection - Affordable Housing Policy Gap - No policy currently sets out requirements for affordable housing or housing mix (size and tenure). - Council must use Housing Needs Study (April 2024) and other evidence to inform Local Plan policies.

- Policies should provide clarity for developers and undergo viability testing to ensure deliverability.

Table 8: Chapter 8. Economic Prosperity

Policy/Section	Main Issues Raised
SP16 Strategic Site: MIRA Enterprise Zone	General Comments • Policy Alignment and Futureproofing: Welcome policy supporting high-quality employment aligned to MIRA Enterprise Zone but recommend reflecting evolving innovation in mobility and automation technology to avoid limiting emerging automotive-aligned sectors. Strategic B8 requirements for Leicester and Leicestershire are still emerging and depend on HNRFI DCO outcome; advise strengthening focus on Hinckley Urban Area for futureproofing. • Plan notes adequate supply (66ha) but forecasts additional need (33–55ha); request clarity on which sectors are expected to grow. • Concern that emphasis on large warehousing may limit employment diversity; automation trends require different skill sets and back-office functions. • Need assessment of HBBC residents' skills and policies to upskill workforce for future occupiers. • Consider hybrid-working trends and whether HBBC has sufficient high-quality, flexible office accommodation. • Questions raised: workforce skills, employment at MIRA, need for “grow-on” space for existing businesses. • Highway Network Capacity: Policy SP16 traffic impact clause should consider cumulative effects of developments along A5 corridor; currently no plans to increase A5 capacity between M1 and M6. All developments should reduce generated travel and contribute to wider mitigation measures. Surprised national/local highway authorities have not addressed this in formal responses. • Horiba MIRA welcomes continued support for employment development related to automotive research, development, and innovation. Supports allocation of the site and provision of complementary uses under Policy SP16 Part B. • WPC requests all planting be native and MIRA have explicit biodiversity targets.

	Objection • Policy SP16 Part C : Requirement for “clear and evidenced need” for complementary uses considered excessive; suggest rewording to require “clear synergy” instead. Example: solar farm proposals at MIRA difficult to evidence need, but strong synergy with site’s function and sustainability goals.
Supporting Text	General Comments • Employment Land Need & Supply: Additional requirement for 33–55ha of general employment land identified; some respondents suggest windfall sites like Hansom Court could help meet this need. Employment Land and Premises Study 2024 shows 194.68ha allocated, which is 43.25ha more than required, but strategic B8 needs remain uncertain and depend on the Hinckley National Rail Freight Interchange (HNRFI). Current supply includes 66ha of land with permission, plus MIRA Enterprise Zone allocations (specialist automotive and strategic B8 uses). Concerns that strategic sites may absorb allocations intended for general employment, leaving gaps. • Strategic B8 & HNRFI: Strong emphasis on Hinckley’s strategic location for logistics and B8 uses. HNRFI proposal still unresolved; respondents urge clarity and contingency planning in the Local Plan. • Retail & Town Centres: Support for flexible policies to maintain vitality of Hinckley town centre and local centres. Recognition of changing retail trends (e.g., post-COVID shift to online shopping) and need for mixed-use development. • Transport & Infrastructure: Local Highway Authority highlights severe capacity issues on A5, M1 J21–21a, and Leicester Western Bypass. Calls for coordinated, cross-boundary transport strategy and robust evidence base. Suggests policy wording changes (e.g., replace “bus” with “passenger transport”). • Policy Clarity: Requests for clearer references (e.g., Wood Farm site inclusion in employment land tables). Some comments note redundancy in text and recommend restructuring for clarity. • General endorsement of: Council’s approach to economic growth and employment land provision. Flexibility in town centre policies to allow non-retail uses and residential development. Strategic focus on Hinckley and Bosworth for

	logistics and B8 employment. Active engagement with transport authorities in planning for growth. Objections • Over-Allocation Concerns: Some argue that allocating 194ha vs. 55ha need is excessive and should be balanced with housing growth to support workforce needs. Suggest similar flexibility for housing allocations, especially near employment sites (e.g., Bagworth). • Plan Timing & Evidence Criticism that Regulation 18 draft does not fully address strategic B8 requirements or reflect upcoming NPPF changes. Calls for delaying Regulation 19 stage until national policy updates and HNRFI decision are clear. • Delivery Risks: Doubts about whether strategic sites (e.g., Earl Shilton, Barwell SUEs) can deliver employment land as planned. Concerns that current allocations may not meet general employment needs if strategic sites prioritize B8 uses.
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Table 9: Chapter 9. Town, District, Local and Neighbourhood Centres

Policy/Section	Main Issues Raised
Supporting Text	General Comments • Evidence and Strategy: Respondents welcome the forthcoming Hinckley Town Centre Strategy and Masterplan, and the review of retail frontage designations. They expect flexibility for mixed-use development and residential uses to improve vitality and footfall in town centres. • Retail Trends: Recognition of changing retail patterns and the need for managed contraction of core retail areas, with emphasis on healthier options and restrictions on hot food takeaways. • Transport and Policy Controls: Suggestions for Article IV Directions to protect key town centre uses, and conditions to regulate changes of use to maintain sustainable access. • Heritage Considerations: Historic England supports regeneration but stresses heritage-led approaches for historic centres.

- **Neighbourhood Centres:** Observations that few rural villages have designated neighbourhood centres; calls for clarity in classification.
- **Evidence Base Concerns:** Criticism of outdated evidence for removing Hinckley Retail Park's Local Centre designation; requests retention due to its role and proximity to major housing growth.
- Support for policies promoting flexibility in town centres, mixed-use development, and residential integration to enhance vitality.
- Endorsement of plans to review shopping frontage designations and involve stakeholders in evidence preparation.
- Historic England supports the Local Plan's intention to sustain and enhance heritage assets while promoting vitality.

Objections

- **Market Bosworth Classification:** Overwhelming objections to Market Bosworth being designated as a District Centre. Respondents argue it lacks key facilities (supermarket, bank, full-time post office, adequate library, public transport). Many suggest reclassification as a Local Centre or creation of a new category such as Heritage Centre or Tourism Destination to reflect its historic and rural character. Concerns that incorrect classification will lead to disproportionate housing allocations, loss of rural character, and strain on infrastructure (schools, healthcare, parking, roads). Strong emphasis on the importance of the Market Bosworth Neighbourhood Plan and its housing needs assessment, which respondents feel is ignored.
- **Infrastructure and Services:** Objections highlight lack of infrastructure upgrades alongside proposed growth; schools, medical facilities, traffic management, and parking are already overstretched.
- **Tourism and Heritage Impact:** Fear that excessive development will damage Market Bosworth's historic appeal and tourism economy.
- **Evidence and Soundness:** Objections to removal of Hinckley Retail Park's Local Centre designation without updated evidence, undermining the Local Plan's soundness.

	• Traffic and Parking: Concerns about worsening congestion and pedestrian safety in Market Bosworth and other centres. • Housing Mix: Criticism that new developments fail to meet local needs (starter homes, smaller properties, bungalows) and instead focus on large, expensive homes.
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Table 10: Chapter 10. Communities, Leisure and Tourism

Policy/Section	Main Issues Raised
SP19 Twycross Zoo	General Comments • Visitor Numbers Correction: Page 81 should state that the attraction welcomes 500,000 visitors, not 5 million. • Tourism in Vision: There is a request for tourism to be reinstated in the vision for the Local Plan. • Expansion Area for Twycross Zoo: Request to amend Figure 2 to include the potential expansion area for Twycross Zoo to support its role as a visitor and tourist facility and implement its Conservation Strategy 2023–2030. A plan will be provided once land purchase is complete. • Impact on Local Tourism: Sheepy Parish Council raises concerns that the Twycross Zoo Special Policy Area could create a ‘closed economy’, reducing trade for local businesses such as B&Bs. Calls for a coordinated approach to tourism and assessment of rural development impacts. • Support for Policy SP19 with Amendments: Twycross Zoo supports the aims of draft Policy SP19 but requests: Explicit encouragement for overnight visitor accommodation on-site. Inclusion of the potential expansion area in Policy SP19 and Figure 2. Policy wording changes to allow developments directly related to the Zoo, visitor accommodation, staff accommodation, and conservation-related facilities. Emphasis on sustainability benefits of on-site accommodation and alignment with the Zoo’s conservation goals (e.g., managing 30% of land for wildlife by 2030 and training 5,000 native species champions). Support

	WPC supports promoting tourism and requests that the Hinckley & Bosworth Tourism Strategy is referenced in this section.
Supporting Text	General Comments - Visitor Numbers & Text Accuracy: Correction requested for Twycross Zoo visitor numbers (should be 500,000, not 5,000,000) and amendments to SP19 wording to reflect accurate figures and conservation aims. - Policy Amendments: Suggested changes to paragraphs 10.1–10.3 to: Emphasize Twycross Zoo’s role as a major conservation and education centre. Include overnight accommodation and expansion of the Nature Reserve. Recognize the new National Science and Conservation Centre and potential expansion area. - Tourism Recognition: Market Bosworth is highlighted as a major tourism destination; calls for protection of its character and recognition in the Local Plan. Section on Communities, Leisure and Tourism seen as inadequate should reflect wider borough assets, rural strategy, and tourism strategy. - Leisure Opportunities: Calls for better integration of parks, open spaces, cultural assets, and road safety. Suggestion to promote equestrian tourism and multi-user routes to boost local economy. Objections - Market Bosworth Classification & Tourism Strategy: Strong objection to limiting Section 10 to Twycross Zoo; Market Bosworth should be fully recognized as a heritage and tourism destination. MBPC argues for a holistic review of Market Bosworth to balance housing growth with tourism development. Suggests creating a “Tourism/Visitor Growth Strategy” to manage competing demands and protect the parish’s character. - Policy Scope: Criticism that SP19 and Section 10 are too narrow, failing to represent the borough’s cultural, leisure, and tourism assets.

Table 11: Chapter 11. Natural Environment

Policy/Section	Main Issues Raised
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SP20: Green Infrastructure

General Comments

- Green Infrastructure Designation & Longevity: Carlton PC stresses that land provided off-site for mitigation should be designated as green infrastructure in perpetuity, with ownership possibly transferred to conservation bodies (e.g., Wildlife Trust, Woodland Trust, RSPB) or designated as village/town green.
- Recognition of Key Assets: National Forest and Charnwood Forest Regional Park should have stronger policy support and recognition through specific policies.
- Policy SP20 Refinement: SP20 needs clearer application and removal of conflicting standards (Natural England vs. Building with Nature). Current wording is verbose and duplicates legal requirements for biodiversity net gain (BNG) under the Environment Act 2021.
- Equestrian Activity & Health: Highlights the health and wellbeing benefits of equestrian activities and their link to outdoor recreation.
- Policy Integration: Policies SP20, SP21, SP24, SP25, SP28 lack clarity on how they interrelate, especially regarding mandatory 10% BNG.
- Historic Environment: SP20 and SP28 should explicitly recognise cultural heritage assets (historic parks, gardens, canals) as part of multifunctional green-blue infrastructure.
- Twycross Zoo Alignment: Proposes adding a clause to SP20 to promote wildlife corridors and enhance the Twycross Zoo Nature Reserve concept.
- Ashby Canal: Recognised as a strategic green infrastructure corridor; development should contribute to its protection and enhancement.
- Lawton Review Reference: Suggestion to include "Bigger, better, more joined up" quote from The Lawton Review.
- Nature Policies Clarity: HBF recommends revisiting nature-related policies to clarify BNG delivery and correct misplaced text in SP25.
- National Forest Planting: Include a criterion requiring development in the National Forest to follow planting guidelines.

Support

- Natural England: Supports SP20 for its clear approach to delivering green infrastructure and alignment with Natural England's GI Framework. Suggests strengthening

	references to GI Standards (e.g., Accessible Greenspace, Urban Greening Factor, Tree Canopy Cover) and setting measurable targets (e.g., “green in 15” access within 15 minutes’ walk). Welcomes climate change references and integration with local strategies. Objections • Public Open Space Standards: Policy SP20 lacks clear POS standards; next iteration should include evidence-based requirements considering site capacity and viability. • Policy Overreach & Viability: DWH objects to SP20 for exceeding national policy by mandating Building with Nature standards without viability evidence. Suggests making BwN optional (“where possible”) and aligning with NPPF soundness tests.
SP21: Green Wedges	General Comments • Maintain some green space between urban centres. • Add references to blue networks and enhance visual appearance in policy points; clarify duplication and typos in criteria (n–r and m). • LCC suggests adding “essential transport infrastructure” as an acceptable land use in Green Wedges. • Policies SP20, SP21, SP24, SP25, SP28 need clearer integration, especially for delivering mandatory 10% Biodiversity Net Gain (BNG). • HBF recommends revisiting nature policies and allowing Green Wedges to host off-site BNG units; clarify that BNG is not a refusal reason. • Concern that Green Wedges lack national policy recognition and are vulnerable to development. • Suggest cross-reference to Stoke Golding Area of Separation and correct typos (e.g., “Meadows” should be singular). • Define jargon like “green lung” for clarity. Support • Anstey Parish Council supports inclusion of Green Wedge policy. • Natural England welcomes policy and suggests using Green Wedges for BNG habitat banks; highlights benefits for active travel and health.

	- Support for Rothley Brook Meadow Green Wedge alignment with Charnwood Local Plan and regional green wedge strategy. Objections - Crabtree Farm site: Unclear if included in Green Wedge; logic suggests western part should also be removed due to housing approval. - Policy SP21 replicates Core Strategy Policy 6, restricting housing in sustainable locations; should assess parcels individually. - Green Wedge acts as a de facto Green Belt, overly restrictive and not referenced in NPPF; Council should revisit boundaries to allow sustainable development. - Harrow objects to lack of flexibility; policy should permit exceptions where objectives aren't compromised. Suggests Barwell Green Wedge review to enable regeneration. - Specific sites (e.g., Land off Sapcote Road, Land east of Ashby, Land south of A47, Dawson's Lane) cited as sustainable but constrained by Green Wedge designation. - Concern that Green Wedge policy prevents housing delivery despite pressing need and delays in strategic sites.
SP24 Protecting Biodiversity	General Comments - Policy Tone & Strengthening: Concern about the tone of biodiversity policy; should emphasise <i>protection</i> rather than exceptions. Strengthen wording on irreplaceable habitats to prioritize avoidance and bespoke compensation. Amend para 11.7 to require up-to-date protected species surveys. - Clarity & Structure: Suggest separating points for national vs international sites for clarity. Conservation objectives apply to European sites; SSSIs aim for "favourable condition." Welcome District Level Licensing inclusion. - Evidence & Integration: Concerns over reliance on outdated Green Infrastructure Strategy (2020) and missing reference to 2024 Strategic Flood Risk Assessment. Recommend referencing Local Nature Recovery Strategy (LNRS) and mandatory Biodiversity Net Gain (BNG). Update NPPF references. Highlight health and wellbeing benefits of green infrastructure and accessibility for diverse groups. - Policy Linkages: Policies SP20, SP21, SP24, SP25, SP28 lack clarity on how they interrelate, especially regarding 10% BNG delivery.

	• Specific Additions ○ Include protection for endangered urban wildlife (e.g., swifts, house martins) and mitigation for lost nest sites. ○ Reference River Mease SAC in pollution/nutrient neutrality policies. ○ Archaeological surveys should be required for developments. ○ Improve formatting of long policies (SP24, SP25) with paragraph numbering. • Technical Adjustments ○ Add biodiversity to natural capital assets list and include “blue” in infrastructure maintenance. ○ Recognize biodiversity benefits of mineral/waste site restoration. ○ Clarify that BNG is not a refusal reason; should be secured post-permission via conditions. Support • Natural England welcomes the policy overall and inclusion of District Level Licensing. • Ashby Canal Trust supports Policy SP24 for protecting SSSI sites and details ongoing conservation efforts (e.g., dredging, hedge management, aquatic plant monitoring). Objections • Development will destroy natural beauty and wildlife; policies should aim to increase biodiversity, not reduce it. • Concern that Policy SP24 requires compliance with Water Cycle Study and LNRS, which are incomplete and not published for consultation making assessment difficult. • Similar objection repeated: SP24 replaces DM6 but relies on unfinished evidence documents, undermining soundness.
SP25 Enhancing Biodiversity and Habitat Connectivity	General Comments • Policy SP25 duplicates statutory BNG requirements; should be streamlined and avoid unnecessary detail at application stage.

- Embed Local Nature Recovery Strategy and link to Green/Blue Infrastructure, including mineral/waste site restoration benefits.
- Clarify how SP20, SP21, SP24, SP25, and SP28 work together; consider an SPD for consistency.
- Allow flexibility in information required for demonstrating BNG; avoid rigid requirements.
- Concerns about 30-year timeframe for habitat development; recommend off-site mitigation land be designated as green infrastructure in perpetuity.
- Include species-specific measures (e.g., swift bricks, bird boxes) as they fall outside BNG metrics; reference best practice and other councils' policies.
- Recognize Ashby Canal's ecological role and improve towpath access; developer contributions suggested for enhancements.
- Environment Agency recommends referencing "measurable" BNG and including watercourses in calculations.
- Suggest clearer formatting (paragraph numbering) for usability.
- Clarify offsetting options (local sites, biodiversity banks, national credits).
- Ensure policies do not exceed national standards without viability testing.

Support

- Natural England welcomes SP25, notes alignment with mandatory BNG and strategic documents (LNRS, GI strategy).
- Environment Agency supports inclusion of measurable BNG and detailed commentary.

Objection

- Developers argue SP25 should be more flexible and avoid duplication of national legislation.
- Concerns about viability if requirements exceed statutory 10% BNG.
- Policy should explicitly allow offsetting and clarify mechanisms.
- Last sentence of SP25 appears misplaced; BNG should not be a reason for refusal.

	Recommend adding “where possible” to habitat creation requirements and removing prescriptive measures that may not suit all sites.
SP26: Development in the Countryside and Settlement Separation	General Comments - Policy SP26 vs DM4: SP26 is seen as more restrictive and less flexible than DM4. DM4 supported economic growth and sustainability, which respondents feel should be retained. - Transport Considerations: Suggest adding a bullet point requiring residual traffic and transport impacts to be addressed per policies HT01–HT04. - Sport England: Welcomes inclusion of outdoor sport and recreation, emphasizing accessibility by public transport, walking, and cycling. - Policy Wording: Requests to clarify preamble and add exclusions for Green Wedges; also amend clauses to allow previously developed land in sustainable locations. - Tourism & Leisure: Policy should recognize tourism as a key asset and consider impacts on tourism. Suggestions include promoting equestrian tourism and multi-user routes to connect heritage sites. - Policy Vagueness: Section 6.15 considered vague and recommended for removal. - National Forest: Amend criterion iii to align with Sustainable Tourism Accommodation Guide. - Green Wedge Clarity: Introductory sentence and item 'v' appear contradictory; needs clarification. Support - Welcomes inclusion of minerals and waste development in permitted countryside uses. Objections - Restrictive Nature: SP26 overly limits development outside settlement boundaries; should allow development adjacent to urban areas or key rural centres if housing need exists or HBBC fails housing supply tests. - Housing Need: Policy should support housing near Rural Hamlets where local need is evidenced (e.g., via Neighbourhood Plan or Housing Needs Survey).

	• Environmental Concerns: Development threatens wildlife (bats, badgers, foxes), natural habitats, and greenspaces. Requests removal or refinement of clause allowing “other uses compatible with countryside location.” • Loss of Open Space: Concern over losing well-used walking areas due to housing developments.
SP27 Landscape Character	General Comment • Evidence Base Concern: Policy SP27 requires conserving and enhancing key landscape features, but the supporting evidence (landscape character assessment and sensitivity study) dates back to 2017 and references the 2012 NPPF. This is outdated and should be updated to reflect current understanding. • Policy Wording Issue: The policy wording is inconsistent with NPPF paragraph 180, which expects recognition of intrinsic character and beauty rather than the stronger “protect and enhance” requirement. This inconsistency should be addressed. • Technical Note: Final sentence referring to “urban form” should clarify that it applies to all settlement types (urban and rural). Support • Natural England supports the policy and welcomes reference to the Hinckley & Bosworth Landscape Character Assessment and inclusion of National Character Areas (NCAs) at paragraph 11.49. Objection • The Local Plan does not align with the Neighbourhood Plan regarding the Landscape Character Assessment. Important views, such as from Shenton towards Station Road, have been ignored in housing allocation. • Current proposals risk significant adverse effects on Market Bosworth’s intrinsic beauty, open character, and landscape character (Policy SP27). Once views are lost, the town’s character will be permanently changed.
SP28 Blue Infrastructure	General Comments • Policy SP28 – point a): Should reference River Sence (Poor Status) alongside Ashby Canal; WFD objectives are important.

- Policy SP28 – point g): Correct term should be “Local Wildlife Site.”
- Para 11.58: Needs better description of River Sence as a significant catchment at Poor Chemical Status.
- Suggest placing Blue Infrastructure policy immediately after SP20 (Green Infrastructure) for clarity.
- Welcome mention of still water bodies (Thornton Reservoir, Groby Pool); note former mineral/waste sites can provide green/blue infrastructure and flood storage. Include Sustainable Urban Drainage in policy.
- Carlton PC: 30 years is short for habitat development; off-site mitigation land should be designated green infrastructure in perpetuity, possibly transferred to conservation bodies.
- Criterion d) in Blue Infrastructure contains duplicated text.
- Policy SP28 wording should be aspirational but deliverable; measures may not always be feasible.
- 8m buffer requirement lacks justification; recommend “appropriate” buffers informed by flood risk assessment.
- Policies SP20, SP21, SP24, SP25, SP28 need clearer integration, especially for 10% biodiversity net gain.
- Historic England: SP20 and SP28 should explicitly recognise historic environment’s role in green-blue infrastructure.
- HBF: Nature policies should clarify BNG delivery; SP21 should allow off-site BNG in Green Wedges; SP25 sentence misplaced.
- Policy SP28 considered vague and unclear; needs amendment for effectiveness.

Support

- Strong support for Policy SP28 and its bullet points (though d) needs reformatting).
- Welcome requirement for built development to be at least 8m from watercourse banks; suggest wording include “including Main Rivers.”

Objections

- Blanket 8m buffer for all watercourses inappropriate; recommend “appropriate offsets” based on scale/nature of watercourse.

	• DWH: Final paragraph on 30-year maintenance is onerous and should be removed; such details usually handled by condition, not policy. • Policy SP28 as written not justified under NPPF paragraph 35(b).
Supporting Text	General Comments • Clarity Issues: Sentence about Rothley Brook Meadow Green Wedge boundary amendment is vague; needs location detail. Wording on “substantial still water bodies...including those are former mineral sites” is misleading; Groby Pool and Thornton Reservoir are not former mineral sites. • Environmental Concerns: River Mease SAC: Principles should be strictly enforced and include nutrient neutrality. Avoid filling open and green spaces with solar farms. • Character & Landscape: North-Eastern GI Zone characterization as Charnwood Forest “fringe” is misleading. Twycross Open Farmland: Requirements should apply to the whole parish due to its unique historic character. • Farming & Rural Economy: Strong support for farming recognition in the draft plan; request for a dedicated section highlighting farming’s role in food production and environmental protection. Criticism of Mercia Park development on prime farmland; NFU and local farmers suggested as contributors. • Biodiversity Net Gain (BNG): Twycross Zoo proposes creating a BNG offsetting site on its land and seeks discussion with the Council. Support • Positive feedback on the draft plan’s recognition of farming and natural landscapes. • Agreement that growth should respect natural landscapes and conserve/enhance the environment. Objections • Policy Gaps: No clear policy on open space provision in the plan. Open space standards should be explicitly set out, evidenced, and viability-tested to ensure deliverability. Current Open Spaces Study postdates previous DPD; needs integration into the new Local Plan.

Table 12: Chapter 12. Transport

Policy/Section	Main Issues Raised
SP29 Transport, Movement and Access	General Comments • Transport Strategy Alignment: The Local Transport Authority (LTA) emphasizes referencing the emerging North of Leicester Local Cycling and Walking Infrastructure Plan (LCWIP) and the Local Transport Plan (LTP4) in the Local Plan. LTP4 vision: <i>Delivering a safe, connected, resilient transport network supporting health, economy, and environment</i>. Five core themes: health & wellbeing, environment, economic growth, resilience, innovation. Six core policies: managing demand, enabling travel choice, delivering solutions, embracing innovation, evaluating progress. Need for cross-boundary transport strategy (e.g., Hinckley–Nuneaton links) to reduce carborne traffic. • Equestrian Access: Horse riders are vulnerable road users; planning should integrate safe equestrian routes alongside cycling and walking strategies. NPPF and Highway Code revisions support protecting rights of way and equestrian safety. • Infrastructure & Policy Requirements: Electric vehicle charging points should be mandated (already in Building Regulations). Policy wording should clearly require developments to reduce transport impact and reflect hierarchy. Criticism of reliance on traffic models (predict-and-provide approach); advocates for vision-led planning to address congestion and climate goals. Support • Endorsement of sustainable transport infrastructure design integrated with green infrastructure. • Agreement that Policy SP29 aligns with NPPF and supports housing/employment allocations (e.g., Markfield site). • Support for reducing car trips and promoting public transport, especially near existing routes (e.g., Stoke Golding). Objections • Infrastructure Capacity Concerns: Policy acknowledges significant transport impact but lacks measures to maintain or improve infrastructure. A46/A50 roundabout already

	gridlocked; safety issues with traffic lights and speeding; additional development would worsen congestion. • Local Access Issues: Proposed York Close development: Roads (Weston Drive, Lancaster Avenue, Tudor Close) are narrow, unclassified, unsuitable for HGVs. Parking restrictions would disrupt residents and services. Risks to pedestrian safety, especially children; potential damage to drains/infrastructure. Village already congested; parking at capacity; adding 100 homes would overwhelm infrastructure. • General Overdevelopment Concern: Area has doubled in size in 10 years; roads cannot cope with more housing and traffic.
SP30: A5 Improvement Corridor	General Comments • The A5 is a vital strategic corridor supporting economic growth but is heavily constrained and lacks clear upgrade plans. • Cycling and walking strategies north of Leicester should be referenced alongside LTP4 objectives. • Significant investment is needed to prevent worsening congestion; rigorous impact assessments and mitigation measures are essential. • Requests for Rugby Borough Council to be kept informed of evidence and infrastructure plans. • Parish Council suggests upgrading A5 to Expressway standard and allocating land for widening and buffer zones. • A5 is a barrier to active travel; development should provide safe access for walkers, cyclists, and equestrians. • Past development along A5 has not been matched with credible capacity improvements; major junctions remain bottlenecks. • National Highways has no current capital programme for A5 upgrades; government funding uncertainty persists. • Growth agenda conflicts with climate change mitigation and sustainable transport principles. • Draft policy SP30 lacks clarity on contributions, infrastructure requirements, and viability testing; appears deferred to application stage. • Emerging NPPF moves away from “predict and provide” transport planning.

	• Policy should align with NPPF tests for planning obligations and provide clear contribution calculation methods. Support • Policy seeking financial contributions towards A5 improvements aligns with the Leicester and Leicestershire Strategic Growth Plan and is supported. Objections • Health concerns: Dualling A5 near settlements may increase noise and air pollution. • Road safety concerns: A5 has high collision rates at private accesses and roundabouts, far above national averages. • Strategic uncertainty: Hinckley National Rail Freight Interchange and SRN investment plans are unclear. • Local Transport Authorities (Leicestershire & Warwickshire) warn that growth impacts would be severe without strategic A5 solutions, which currently lack deliverability. • WANA argues there is no sound basis for further development given infrastructure limitations and uncertainties.
Supporting Text	General Comments • Ashby Canal Towpath: Recognized as a key element for promoting active travel (walking/cycling), improving health and well-being, and enhancing connectivity. Suggests policies should acknowledge its role and advocate for improved access, surface upgrades, and integration with wider networks. • Transport Assessment: Council awaits results to understand growth impacts on Leicester's transport system. Current evidence is insufficient to determine if additional growth can be accommodated or what measures are needed. • A5 Strategy – Local Impacts: Concerns about diversion routes (e.g., A444) during A5/M42 works causing increased HGV traffic, road damage, safety issues, and property vibration in villages like Twycross. Support • City Council supports the principle that development impacting the strategic road network should involve cross-boundary liaison with neighbouring highway authorities. Objections

	• A5 Strategy as Evidence: Local perception is that junction improvements (A5/A47) have not resolved pinch points; real issues remain at Dodwells Bridge. • Midlands Connect Reference: Lacks detail on priorities and relevance. • Strategic Growth Plan Reference: Mentions A5 corridor improvements but fails to localize policy implications. • A5 Partnership Objectives: Calls for full dualling and major upgrades (RIS3/RIS4), raising concerns about drastic changes, local access, settlement impacts, and disruption during works. Local opinion opposes an Expressway but supports resolving bottlenecks. • Threats Identified in A5 Strategy: Increased congestion, air quality issues, lack of lorry parking, and cumulative growth impacts are not addressed in the Local Plan.
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Table 13: Chapter 13. Infrastructure

Policy/Section	Main Issues Raised
SP31 Infrastructure and Delivery	General Comments • Sport England supports inclusion of indoor and outdoor sports provision as essential infrastructure but notes lack of robust assessment for indoor facilities (NPPF para 102). • Policy SP31 requires developers to provide infrastructure or mitigate impacts; Phase 2 Infrastructure Capacity Report highlights Desford's needs for education and healthcare expansion. • Bellway's site south of Bosworth Academy could address infrastructure constraints, but Council has not allocated it despite evidence. • Developer contributions must comply with CIL regulation tests and NPPF para 57; Infrastructure Delivery Plan (IDP) should be published before Regulation 19 consultation. • HBF agrees contributions should only mitigate development impacts, not historical underinvestment. • Delivery of infrastructure is vital; strategic sites are best for securing infrastructure. Waste management and water supply should be considered critical.

	• Lack of IDP and funding clarity poses risk to plan soundness; highways are critical, but prioritization unclear. Support • Positive feedback for Policy SP31 and its supporting commentary. • Agreement that developer contributions can help create sustainable development and viability assessments should remain part of SP31. Objections • Market Bosworth lacks adequate services (no supermarket, post office, bank, train station); local services (dentist, doctors, schools) are at breaking point; no infrastructure improvement plans. • Local primary schools overcrowded; roads already problematic. • Policy SP31 wording criticized for requiring developers to address existing deficiencies, contrary to NPPF para 75. • IDP lacks clarity on monetary contributions; policies must be unambiguous (NPPF para 16). • Concerns that policy requirements (affordable housing, housing mix, accessibility) lack evidence and may affect viability. • Need for timely infrastructure delivery alongside growth; viability assessment essential to ensure obligations are deliverable.
SP32: Water Supply and Wastewater Management	General Comments • Building Regulations vs Planning Policy: Several respondents argue that water efficiency and carbon neutrality standards should remain within Building Regulations, not duplicated in planning policy. They suggest revising wording to avoid overlap. • Water Efficiency Standards: Concerns raised about requiring 110 litres/person/day when Building Regulations already set 125 litres/day. Some note the industry often achieves 115–110 litres/day voluntarily. • Responsibility for Water Infrastructure: Multiple comments state that assessing water supply and wastewater capacity should be the water company’s legal responsibility, not developers or planning policy. • Evidence for Higher Standards: PPG allows LPAs to set stricter standards only if justified by local evidence.

	Respondents question whether Hinckley & Bosworth has demonstrated this need. - Policy Justification: References to Severn Trent's Water Resources Management Plan are noted, but clarity is needed on its relevance to the borough. Support - Welcomes inclusion of the policy and its aims for water efficiency and infrastructure provision. - Suggests minor wording changes for clarity (e.g., requiring BREEAM Excellent for non-residential development and specifying applicant responsibilities for major/minor developments). Objections - Infrastructure Capacity: local residents highlight risks of sewage treatment works being overwhelmed by new development, especially in areas like Witherley prone to runoff. - Flooding & Water Supply Issues: Residents report existing problems with flooding and water pressure, fearing new development will worsen these. - Policy Overreach: Developers and industry bodies object to requirements for water neutrality and capacity assessments, arguing these are outside planning's remit and covered by other legislation (Water Industry Act 1991).
SP33 Telecommunications Infrastructure	General Comments - Suggestion that full fibre connections should be buried underground. Objections - Telecommunications in the village are extremely poor, especially in peripheral areas with limited Wi-Fi/broadband connectivity despite a communications mast being installed. - The introduction of new dwellings will further dilute the already poor connectivity.
Supporting Text	General Comments Infrastructure & Services: Local services (water, sewerage, transport, highways, mobile coverage, broadband) already face deficits; these must be

addressed alongside new provision. Lack of public transport in some villages; sewerage and mobile signal issues persist.

- **Developer Contributions & Transparency:** Parishes should have more involvement in Section 13 developer contribution process; current lack of transparency means oversubscribed schools remain unresolved.
- **Education Provision:** New developments require significant school planning; large settlements (e.g., Norton Juxta Twycross proposal) offer flexibility for primary and secondary provision. Threshold for new primary schools: ~1,400–1,500 dwellings; secondary schools needed for sites of ~4,500 dwellings or more.
- **Healthcare:** Increased population will impact NHS services (primary, hospital, community care); developer contributions needed to mitigate.
- **Transport & Highways:** Significant challenges and costs anticipated for highways and strategic road network improvements (M1, A5, A46); risk to plan viability if costs fall solely on developers.
- **Energy & Net Zero:** National Grid emphasizes early engagement for capacity planning; LPAs should safeguard land for substations and retain overhead lines where possible.
- **Community Facilities:** MPC needs new cemetery (5–6 years capacity left), surgery extension, play area improvements, Main Street investment, and transport funding for schools.

Objection

- **Infrastructure strain in Market Bosworth:** Local dentist no longer accepting NHS patients; private list nearly full. Long waits for GP appointments; reduced capacity at Newbold Verdon surgery due to new housing. Existing primary and secondary schools cannot accommodate projected population growth; new schools would alter town character and heritage. Parking already limited; new housing outside walking distance worsens congestion and impacts tourism.

Table 14: Appendices

Policy/Section	Main Issues Raised
Appendix 1: Glossary	General Comment • Ensure Local Nature Recovery Strategy is referenced
Appendix 2: Key Diagram	General Comment • The transport section still shows bus routes 1 and 2, which no longer exist. • Development cannot proceed until additional bus services and cycleways are provided. • The current key diagram only shows Barwell and Earl Shilton Sustainable Urban Extensions. • The next version of the key diagram should clearly illustrate all strategic development locations.
Appendix 3: Site Allocations	General comment • For site LPR22 (Land at Wapping and Harrow Farm), the draft Local Plan commentary requires all hedges to be retained. • Hedgerow quality will be assessed, but some removal will be necessary for vehicular access. • The Illustrative Masterplan includes hedgerow enhancement to achieve a net positive outcome. • A more flexible approach is recommended instead of a blanket retention policy. Call for Sites Submission: • Some allocated sites lie within the National Forest. • Site information should reference: ○ National Forest location ○ Compliance with National Forest Policy (design, character, appearance) ○ Requirement for National Forest planting
Appendix 4: Strategic and non-strategic policies	General Comments • The County Council has focused its comments on strategic policies only. It expresses concern about the large number of smaller proposed allocations, noting that

	their cumulative impact on infrastructure provision will be substantial and challenging. - Missing Policies: Policies SP09, SP12, SP14, SP15, SP17, SP18, SP22, and SP23 are absent from the Draft Plan, raising questions about completeness and alignment with previous frameworks. Objection - The Local Plan does not build upon or reference the Bosworth Neighbourhood Plan, which is considered a significant strategic gap.
Appendix 5: Evidence Base List	General Comments - Rural Strategy: Not referenced in the Consultation Draft or Appendix 5, which is surprising to the Parish Council. - Evidence Base Status: The list is incomplete (ends at “L”). Several key documents are missing or outdated: - Gypsy and Traveller Accommodation Assessment (to replace 2016 study) - Strategic Flood Risk Assessment Level 2 (Level 1 pending sign-off) - Renewable Energy Strategy (2014 version likely invalid) - Habitat Regulations Assessment - Sustainability Appraisal Scoping Report - Critical evidence documents (highway modelling, infrastructure capacity, viability) are incomplete. - South Leicestershire Joint Transport Evidence (JTE) is missing; essential for highways capacity assessment and soundness. - Highway Authority doubts JTE will be ready by June 30, 2025, risking soundness if timetable accelerates. - Agreement needed on infrastructure requirements, funding, and impact on delivery strategy. Objection - Draft Local Plan omits housing requirement for designated neighbourhood areas (NPPF para 67). - Sheepy Parish NP and Market Bosworth NP not considered in evidence base (Appendix 5), unlike other NPs potential legal compliance risk or incomplete appendix.

Table 15: Local Plan in general

Policy/Section	Main Issues Raised
General Comments on the Local Plan	General Comments • Consultation Process Issues ○ Poor publicity and inadequate venues for events (e.g., Market Bosworth and Ratby). ○ Lack of clarity on how previous consultations informed the current draft. ○ Concerns about timescales and delays in plan preparation. ○ Requests for better readability and less duplication in the Local Plan document. • Neighbourhood Plans ○ Strong emphasis on respecting made Neighbourhood Plans. ○ Criticism that Neighbourhood Plans are referenced but not integrated into policies. ○ Calls for Neighbourhood Plan groups to be stakeholders in future stages. • Infrastructure and Services ○ Schools, GPs, dentists, and transport services under pressure from new development. ○ Policing needs and developer contributions for infrastructure highlighted by Leicestershire Police. • Strategic Planning and Policy ○ Need for flexibility in Hinckley town centre redevelopment. ○ Concerns about employment land allocations and lack of justification. ○ Requests for contingency sites to mitigate delivery risks. ○ Cross-boundary impacts (e.g., Stoney Stanton development and NRFI). • Other Themes

	○ Health Impact Assessment being prepared. ○ Desire for indicative implementation timescales. ○ Comments on website layout and document confusion. Support • Endorsement of Local Plan objectives and spatial strategy. • Support for addressing Leicester's unmet housing need and Strategic Growth Plan. • Positive comments on directing growth to sustainable locations and urban areas. • Recognition of the importance of Neighbourhood Plans and cooperation. Objection • Historic Environment: Lack of a dedicated heritage chapter; considered non-compliant with NPPF. • Employment Land Strategy: Site selection process criticized as unjustified and lacking proper Sustainability Appraisal. Specific objections to allocation of LPR95 and support for LPR32 instead. • General Concerns: Perception that previous comments were ignored. Disproportionate housing distribution across political wards.
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Table 16: Sustainability Appraisal

Policy/Section	Main Issues Raised
Sustainability Appraisal	General Comments • SA Scoping Report Limitations: The July 2024 Sustainability Appraisal (SA) Scoping Report only sets out baseline data and appraisal framework. It does not appraise the draft Plan against SA objectives or test reasonable alternatives (e.g., housing growth options or spatial strategies). • Need for Full SA Report: Multiple representations recommend that the next consultation phase includes a full SA report summarizing the plan-making journey, testing reasonable alternatives, and explaining why certain options were selected or rejected.

- **Historic Environment Concerns:** Historic England notes that the SA Scoping Report lacks assessment of the Regulation 18 Plan against SA objectives, making the SA legally non-compliant. They reference guidance (HEAN8) for proper assessment.
- **Housing Growth Options:** Several comments urge testing higher housing requirements and alternative spatial options to ensure the Plan and housing strategy are robustly justified.

Support

- **Site-Specific Endorsements:**
 - Bagworth (Almond Way): Considered suitable for development low flood risk, no major biodiversity or heritage constraints, and potential to improve housing supply and affordability.
 - Hinckley (North of Normandy Way): Low flood risk, minimal heritage impact, and technical evidence supports deliverability. SA methodology (RAG scoring) seen as appropriate.
- **Methodology Approval:** Support for the proposed SA scoring mechanism (seven-point RAG system) to assess sustainability impacts comprehensively.

Objections

- **Legal Compliance Issues:**
 - The Regulation 18 Plan is not accompanied by a full SA, only a Scoping Report. This fails to meet SEA/SA legal requirements and NPPF guidance that SA should inform plan-making throughout.
 - Lack of appraisal of policies, site allocations, and reasonable alternatives (including housing scenarios and spatial strategies) raises risks of the Plan being unlawful.
- **Transparency and Justification:**
 - No clear methodology for site selection; consultees cannot properly engage without SA showing reasons for selecting or rejecting alternatives.
 - Spatial Options for Housing Strategy (SOHS) lists options that are either insufficiently defined or incapable of meeting development needs, making meaningful SA assessment impossible.

	• Specific Site Concerns: ○ LPR95: Evidence shows it is unsuitable and undeliverable due to access issues. ○ LPR32: Considered suitable and recommended for allocation but excluded without clear justification. • Risk of Soundness Failure: Without proper SA testing of reasonable alternatives and compliance with SEA regulations, the Plan risks being found unsound or unlawful at examination.
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Table 17: Supporting Documents

Policy/Section	Main Issues Raised
Call for sites: Employment	General Comments • The Cottage, 3 Nock Verges, Earl Shilton (LE9 7DY) Submitted as part of the call for sites. No further comments provided. • Land to the South of Cliffe Hill Road and North of Grassy Lane, Markfield Submitted as part of the call for sites. No additional commentary. • Three sites submitted through the Employment Call for Sites process Acknowledged and will be considered through the call for site process.
Employment Land Review (ELR)	General comment • Current methodology relies too heavily on historic take-up trends (dating back to 1996), which do not reflect current economic needs. • Lack of a layered approach for estimating industrial and logistics demand. • Recommendation to adopt British Property Federation methodology for logistics demand, factoring in suppressed demand and e-commerce growth. • Concern that emerging Local Plan underestimates employment land needs, risking speculative proposals. • Evidence gaps regarding strategic B8 and large-scale B2/E uses; these are not assessed in the ELR. • Confusion in figures between ELR (2024) and Warehousing & Logistics report (2021) regarding shortfall (sq.m vs ha).

Infrastructure Capacity Study	General comment • Correction needed: Witherley Primary School is at capacity, and Lindley Meadows is within Witherley Parish (contrary to current statement).
SHELAA	General comment • Sites assessed as developable (11–15 years) but promoters argue they are deliverable within 5 years (e.g., Normandy Way, Bagworth). • Suggest inclusion in housing trajectory and five-year supply.

**Warehousing &
Logistics Report
(2021)**

General comment

- Concerns over rail vs road served site split (43% rail vs 57% road).
- Belief that last-mile distribution needs were underestimated.
- Figures in ELR referencing this report appear inconsistent and outdated.

Spatial Options for Housing Strategy (July 2024)

General comment

- **Housing Need Figures:** The SOHS report uses outdated housing need figures (472 dpa + 102 dpa from Leicester = 574 dpa). The Local Plan requirement is 660 dpa, and some representations argue for testing higher figures (e.g., 689 dpa or 820 dpa under proposed Standard Method). Calls for the SOHS report to be updated for consistency with latest evidence.
- **Sustainability Appraisal (SA) Concerns:** The SA accompanying the consultation only sets out scope, not how it shaped the Plan. Lack of clarity on why six spatial options were chosen and whether they represent reasonable alternatives. Need for better integration of SOHS within the wider SA process.
- **Evaluation of Spatial Options:**
 - **Option 1 (NDP-led):** Widely considered unrealistic; NDPs are voluntary and cannot underpin strategic housing distribution.
 - **Option 2 (Core Strategy approach):** Criticized for over-reliance on Urban South and large sites (e.g., Earl Shilton & Barwell SUEs), which have stalled and caused supply shortfalls.
 - **Option 3 (Transport corridors):** Some support for A50 corridor growth, but objections to assumptions about car dependency; bus connectivity and local services should be acknowledged.
 - **Option 4 (New settlement):** Mixed views acknowledged as long-term but concerns about deliverability, infrastructure costs, and timing. One objection argues for considering a much larger settlement (10,000 dwellings at Norton-Juxta-Twycross) for sustainability and infrastructure viability.
 - **Option 5 (Proportionate growth of Key Rural Centres):** Criticized for underestimating sustainability credentials of rural centres; advocates for larger growth to deliver infrastructure and address affordability.
 - **Option 6 (Hybrid approach):** Broad agreement that a hybrid is most realistic but concerns about over-reliance on large sites and lack of tested growth scenarios.

	• Infrastructure & Deliverability: Infrastructure constraints (roads, schools, healthcare) noted for some rural centres, but evidence needs updating. Strategic development could help fund new infrastructure. Risks of absorption capacity and delayed delivery for large urban allocations (e.g., Earl Shilton SUE). Calls for contingency sites or reserve allocations to mitigate delivery risks. • Affordability Issues Contradiction between SOHS stating, “no affordability issue” and Housing Needs Study identifying acute affordability problems. Larger rural growth could help address affordability challenges. • Strategic Employment Growth: Evidence base (AECOM, Strategic Growth Options Mapping) identifies potential employment sites (e.g., north of Groby, west of Dodwells). Concerns about inconsistency with ELR and need for duty to cooperate on cross-boundary strategic growth.
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Table 18: SP02: Spatial Development Strategy comments on specific sites

Policy/Section	Main Issues Raised
Earl Shilton: LPR237	General Comment • Concern noted regarding safeguarding waste facilities under Policy W9 of the Leicestershire Minerals and Waste Local Plan. • Development near existing or permitted waste sites (e.g., Sewage Treatment Works) must demonstrate no adverse impact on amenity or future operations. • Public Health comments have been shared with H&BBC during plan drafting. • Barwell & Earl Shilton SUEs (LTA Comments): • LTA questions continued focus on these areas for growth despite long-standing delivery challenges. • Barwell SUE: Planning permission was nearly granted in 2015, but transport-related S106 issues remain unresolved after almost a decade; viability concerns due to cost inflation. • Earl Shilton SUE: Slow progress only recently gained permission after 15 years.

	• Draft Local Plan still proposes an additional strategic site south of A47 Earl Shilton bypass despite these uncertainties.
Earl Shilton: LPR200	General Comments • Public Transport: There is no public transport at the site. • Spatial Strategy: The principle of directing development to sustainable locations aligns with NPPF requirements. Settlement hierarchy and hybrid spatial strategy approach are considered appropriate. • Minerals & Waste: Site lies within a Minerals Safeguarding Area (Sand & Gravel). Policy M11 requires a Mineral Assessment for non-mineral development. Policy W9 requires safeguarding waste sites and ensuring no adverse impact on amenity. • A5 Corridor: Recognised as having significant capacity constraints. Development must consider impacts and propose mitigation; no committed improvements currently exist. • Health & Amenity: Allocation surrounds Earl Shilton Sewage Treatment Works; topography results in proximity on two sides. Public Health comments have been provided. • Earl Shilton SUE: Support for re-allocation of existing SUE and allocation of land south of A47 (East of Earl Shilton SUE). • Deliverability: Existing SUE has outline permissions; Reserved Matters applications expected soon. • Strategic Location: Earl Shilton is Tier 1 settlement with key services and transport links. • Infrastructure: Development will maximise use of existing infrastructure (schools, community hubs, employment area, A47 improvements). • Site Suitability: ○ Flood Zone 1; low surface water risk. ○ No listed buildings or statutory ecological designations. ○ Opportunities for public transport strategy and pedestrian connectivity. • Capacity: Vision Document proposes ~2,000 dwellings, primary school, local centre, green/blue infrastructure. Objections

	• Deliverability Concerns: Based on lead-in times, unlikely to deliver 900 homes within plan period; full build-out forecast around 2039. • Locational Sustainability: Site is ~1.75 km from Earl Shilton centre; requires crossing A47 with no detail on safe access. • Elmesthorpe Parish Council: ○ Risk of coalescence with Elmesthorpe, loss of rural identity. ○ Lack of site-specific policies at Regulation 18 stage hampers assessment. ○ Areas of separation review outdated; green wedge review did not consider LPR 200. ○ Flood risk areas identified; highways concerns. ○ Requests designation of green wedge and area of separation. ○ Questions compliance with Policy SP26 and duty to consult Blaby District Council. • Alternative Site: Gladman promotes an alternative site closer to services, not reliant on current SUE, and avoids bypass crossing.
Higham on the Hill: LPR181	General comment • Draft Policy SP02's development strategy is supported as it promotes major strategic schemes alongside smaller, sustainable sites that meet local needs and enhance services, aligning with the Local Plan's spatial and social objectives. • Although sites under 100 units are not part of this consultation (to be addressed at Regulation 19 stage), the client highlights land availability at Wood Lane, Higham on the Hill: ○ Located on the western edge of the village, near Lindley Walk development and proposed village shop. ○ Village has community facilities and a primary school, making it a sustainable location for further development. ○ Site plan provided for reference.

Hinckley: LPR1031
(includes
LPR1031A &
LPR1031B)

General Comments

- Policy SP02: Supports locating development in sustainable areas (urban areas first, then key rural centres and villages) to reduce environmental impact.
- Housing Need: Council used the Standard Method (433 dwellings/year), but: Housing Need Study (Apr 2024): 468 dwellings/year and Government's proposed new method: 689 dwellings/year. Council may need additional strategic sites to meet increased housing requirements.
- Middlefield Farm Proposal: Suggests allocating land at Middlefield Farm (LPR 47 & LPR 48) as part of a wider scheme north of Normandy Way. SGP Strategic Growth Options Report identified 128 ha site for 3,200 houses as suitable. Current partial allocation of 1,200 houses seen as insufficient for long-term supply and infrastructure delivery. Site is County Council-owned, considered suitable, available, and deliverable. Minerals Safeguarding Area considerations: Any non-mineral development should include a Mineral Assessment. Waste site safeguarding under Policy W9 must be addressed. County Council intends to market the site post-outline permission, similar to private promoters.

Support

- Richborough strongly supports the proposed strategic allocation at Land at Normandy Way, Hinckley within the draft Local Plan. The site already has planning permission for 475 dwellings (Phase 1), with Phase 2 expected to be approved before plan adoption. The site is available, suitable, and deliverable, with Richborough having a proven track record and working with housebuilders to deliver within five years of adoption. The allocation will provide high-quality market and affordable homes, open space, play areas, sustainable drainage, and infrastructure. Richborough's Phase 2 application (ref: 24/00264/OUT) is at an advanced stage.

Hinckley: LPR138

General comment

- Historic England (HE) highlights heritage considerations for a site with a pending planning application. It advises that any application should assess potential impacts on:
 - The Grade II listed Church of the Holy Trinity.
 - The Scheduled Monument (remains of the motte and bailey castle at Hinckley, NHLE: 1010299).

	○ Other listed buildings in the vicinity.
Hinckley: LPR199	General Comment • Strategic development north of Normandy Way is supported. • Suggests allocating Middlefield Farm (LPR 47 & LPR 48) as part of a wider scheme (SGP Strategic Growth Options Report recommended 128 ha for 3,200 houses). • Current partial allocation of 1,200 houses is questioned; full allocation would: ○ Ensure ongoing housing supply. ○ Support highways and community infrastructure. ○ Provide resilience for Borough housing needs. • If HNRFI DCO Application succeeds, Normandy Way would meet increased housing needs. • Minerals Safeguarding Area considerations: ○ Most of the site is outside safeguarding area. ○ Residential site with outline permission (22/00318/OUT) lies within Sand & Gravel safeguarding area → Mineral Assessment required for future applications. • Waste safeguarding under Policy W9: Development near waste sites must not harm amenity or operations. • Site is in sole County Council ownership, considered suitable, available, and deliverable. • Due diligence completed; draft masterplan and vision statement in progress. • County Council intends to market site post-outline permission, similar to private promoters. • Track record includes Barton Road and other sites. Support • Allocation west of Hinckley West supported: Brings forward residential development in Hinckley Urban Area. Supports 20m natural buffer along Ashby de la Zouch Canal. Site not in Minerals Safeguarding Area. Waste safeguarding applies (Policy W9). • Miller Homes Representation: Supports Hinckley North allocation (AS1029, AS1031A/B, LPR199). Controls 19.4 ha within allocation (minimum 1,200 homes). Western part has outline permission for 475 dwellings; further 415

	dwellings pending. Hinckley is sustainable (schools, sports, employment, transport links). No planning/technical constraints; outside flood zones; no heritage assets. Proposals include social and infrastructure benefits. Committed to buffer design and infrastructure delivery. Miller Homes can provide east-west route connectivity. Active national housebuilder with proven delivery capability. Supports spatial strategy and buffer over minimum housing requirement. Advocates balanced approach with some rural growth. Objection • Delivery of Normandy Way allocation (1,200 units) unresolved: ○ 475 units approved on appeal (Jan 2024). ○ Second application for 415 units (24/00264/OUT) faces unresolved traffic impact issues raised by National Highways. ○ Concerns relate to A5 and connected infrastructure capacity.
Hinckley: LPR22	General Comments • A plan showing National Gas Transmission assets is attached; policies must acknowledge these constraints. • Proposed Employment Allocation under Policy SP02; strategic employment land should be in sustainable locations aligned to transport networks. • Site is not within a Minerals Safeguarding Area; no waste safeguarding concerns. • Historic environment considerations unclear; recommend Site Selection Topic Paper and HEAN 3 process. • A5 corridor is under significant capacity constraints; developers must consider impacts and mitigation. Support • Illustrative Masterplan submitted; site can deliver high-quality employment uses. • Development could create approx. 2,960 FTE jobs and £4m–£4.5m annual Business Rates. • Employment mix: B2 (General Industry), B8 (Storage & Distribution), E(g) (Offices/R&D).

	• Site is sustainably located on the A5 corridor; Council evidence base supports suitability. • Early delivery of 1.6 million sq.ft floorspace expected; strong locational characteristics. Objections • Unexplained asterisk in allocation; major enabling infrastructure costs; flood risk concerns. • Severe A5 capacity issues: low rail bridge, limited traffic capacity, withdrawn upgrade funding. • Appeal decisions show area unsustainable for further development; NBBC Strategic Transport Assessment confirms capacity problems. • Loss of countryside and rural character; urbanisation of Higham-on-the-Hill. • Increased traffic accidents on rural roads; lack of infrastructure to support planned housing. • Negative impact on A5 corridor and neighbouring Local Plan allocations; risk of coalescence between Hinckley and Nuneaton.
Hinckley: LPR31	General Comments • Spatial Strategy & Site Promotion: The spatial strategy aligns with NPPF principles by directing development to sustainable locations. Settlement hierarchy and hybrid approach for housing strategy are considered appropriate. Hinckley identified as Tier 1 Urban Area; allocation of land west of Hinckley West for ~530 homes is supported strategically. Site suitability highlighted: good access, flood zone 1, no heritage or ecological constraints, potential for 550 dwellings with green/blue infrastructure. • Historic Environment Concerns (Historic England): Lack of site assessment information for historic environment. Unclear impacts on Bosworth Battlefield, Ashby Canal Conservation Area, and non-designated assets. Recommendation: include heritage assessment and follow HEAN 3 five-step process. • Canal Proximity (Canal & River Trust): Supports 20m buffer to protect canal character and biodiversity. Warns of structural risks from development (vibrations, piling). Suggests exploring public access via canal bridges and improving towpath for active travel. Recommends inclusion of these requirements in policy SP022.

	• A5 Corridor Capacity (National Highways): A5 corridor under significant capacity constraints. Developers must assess and mitigate impacts on A5 junctions. No committed improvements yet; mitigation to be secured via planning obligations. • One representation supports: Spatial strategy principles. Settlement hierarchy. Allocation of land west of Hinckley West as sound and sustainable. Site suitability and capacity for 550 dwellings. • Historic England raises concerns due to: Lack of evidence on historic environment impacts. Potential harm to heritage assets (Bosworth Battlefield, Ashby Canal, listed buildings). Calls for further assessment before allocation is justified.
Lindley Meadows: LPR235A	General Comment • West Analysis Area has very limited existing sports facilities; on-site and off-site contributions will be needed. • Requests for buffer zones, traffic improvements, and community facilities (schools, leisure, healthcare). • Suggestions for green infrastructure, biodiversity protection, and heritage considerations. • Concerns about flooding, mineral safeguarding, and ecological impacts. Support • Some developers and promoters express interest in bringing the site forward. • Advantages noted: proximity to MIRA Enterprise Zone, potential for new services and facilities in the southwest of the Borough. Objection • Lack of proportionate evidence and justification for Lindley Meadows allocation. • Concerns about deliverability, infrastructure, and transport capacity (A5 corridor issues). • Site outside settlement hierarchy; insufficient clarity on spatial strategy and alternatives. • Education provision concerns (secondary school viability). • Environmental and heritage impacts (Bosworth Battlefield, listed churches, biodiversity).

	• Risk of Local Plan being found unsound due to inadequate evidence base. • Fear of urban sprawl, loss of rural character, and merging of settlements. • Consultation process criticized as inadequate. • Traffic safety concerns and accident hotspots highlighted.
Market Bosworth: LPR139	General Comment • There is no public transport here. • The site lies within a Minerals Safeguarding Area for Sand & Gravel; any planning application should include a Mineral Assessment. • Safeguarding waste sites is important; development must not prejudice their operation. • Public Health comments will be provided in the full HIA report. • Historic England notes concerns about the historic environment and recommends a Site Selection Topic Paper addressing these issues. Support • The respondent is promoting site LPR139, stating it is suitable, available, and achievable. • The site is controlled by a housebuilder and promoted through the SHELAA process. • The masterplan includes supporting infrastructure and demonstrates deliverability. • The site will round off Market Bosworth without conflicting with designations. • The Vision Document shows potential for 130 dwellings, biodiversity net gain, and protection of key views. Objection • The proposed Local Plan ignores Market Bosworth's Neighbourhood Plan. • No consideration for traffic flow, pedestrian safety, or infrastructure (schools, doctors, parking, public transport). • Proposed housing numbers far exceed assessed local need (AECOM identified 77 homes; Local Plan proposes 180+).

	• Market Bosworth lacks capacity for additional housing due to physical constraints and medieval road layout. • Tourism and heritage character will be negatively impacted. • Significant concerns about cumulative growth: existing commitments + speculative proposals could double housing stock. • Lack of public transport and employment opportunities will increase car dependency. • Environmental concerns: loss of agricultural land, biodiversity harm, and failure to prioritize brownfield sites. • Misclassification of Market Bosworth as a District Centre; lacks supermarket, bank, and adequate amenities. • Residents fear deterioration of quality of life, congestion, and safety risks.
Markfield: LPR95	General Comment • Savills report provides evidence of strong demand for Industrial & Logistics (I&L) development in Hinckley & Bosworth and the wider FEMA, highlighting: ○ National growth of I&L sector accelerated by e-commerce and quick delivery trends. ○ Attractive location of H&B for I&L due to central position and transport links. ○ Lack of supply constraining economic potential; high rental growth confirms demand. ○ Better-paid jobs compared to national average. ○ Criticism of existing Employment Land Review (ELR) and Strategic Warehouse Study for underestimating demand. ○ Savills estimates future demand at 191–280ha over 21 years, higher than ELR figures. ○ Draft Local Plan provision of 195ha welcomed; strategic B8 provision to follow HNRFI decision. ○ Even if HNRFI is approved, sub-regional/regional demand remains unmet. ○ Draft Local Plan acknowledges pressure for economic growth and additional employment land needs. • Minerals safeguarding and waste site policies noted; any planning application should include Mineral Assessment.

- Highways impacts and cumulative effects with nearby quarries need consideration.
- Design should reflect National Forest guidelines (30% woodland planting).
- National Highways flags potential need to safeguard land near M1 J22 for future upgrades.

Support

- Policy SP02 allocates 194.68ha employment land (2020–2041), including 28.3ha at Cliffe Hall Farm (LPR95).
- Site is well-located for strategic employment, deliverable, and sustainable.
- Extensive surveys and technical reports show no major constraints:
 - Good transport links (bus services, proximity to Markfield).
 - Safe access achievable; flood risk low (Flood Zone 1).
 - No statutory ecological or heritage constraints; biodiversity net gain achievable.
- Landowners and developer agreements in place; outline planning application planned.
- Allocation text should include “where possible” for habitat retention.
- MPC supports allocation but requests early consultation on employment type.
- Some local support for employment allocation with preference for mixed commercial uses and safe pedestrian connections.

Objection

- Site assessed (26.8ha) smaller than proposed allocation (28.3ha); unexplained asterisk in allocation.
- Land assembly uncertain; enabling infrastructure costly and time-consuming.
- Poor proximity to labour markets; reliance on long-term public transport provision.
- Allocation of LPR95 questioned as ELR only recommended “consider” vs stronger recommendation for LPR32.

	• Landscape Technical Note: Site lies in Ulverscroft Wooded Valley peaceful, upland, good condition, no industrial precedent. • Transport Technical Note: Access issues: ○ No safe access from M1 off slip. ○ Whitwick Road unsuitable; A50 access contrary to policy. ○ Significant junction improvements required.
Ratby: LPR107	General Comments • Classification: Site is a Non-Strategic Major Allocation (100–499 dwellings). • Minerals Safeguarding: Partly within Sand & Gravel safeguarding area; requires mineral assessment. • Historic Environment: Historic England requests detailed assessment for impacts on Ratby Camp, Old Hays Moated Site, Ratby Conservation Area, and listed church. • Sports Facility: Adjacent to Burroughs Park football pitch; mitigation needed to comply with NPPF. • Policy Adjustments Suggested: ○ Housing figure: Change from “450 dwellings” to “about 475 dwellings.” ○ Affordable housing: Opposes blanket 40% rural requirement; suggests site-specific viability approach. Support • Lagan Homes strongly supports ○ Proposal Details: 450 dwellings plus care facility or 475 dwellings without care facility. ○ Includes land for community hub and new primary school. • Deliverability: Technical work completed; no major constraints. Flood Zone 1 (low risk), biodiversity net gain >10% achievable. • Infrastructure & Benefits: New school site, green paths, parkland. Supports sustainable growth and Leicester’s unmet housing need.

	• Transport: Three access points; no major highway concerns. Good bus links to Leicester.
	Objections • Infrastructure Overload: ○ Roads narrow and congested; junction safety concerns. ○ Primary school full; GP surgery overstretched. ○ Utilities fragile (recent water/gas outage). ○ Parking shortages; risk of gridlock. • Environmental Impact: ○ Loss of greenfield land and Burroughs Woods. ○ Increased flood risk from impermeable surfaces. ○ Climate impact: CO₂ emissions from ~900 cars. • Heritage & Landscape: ○ Damage to historic sites (Bury Camp, ridge and furrow fields). ○ Loss of countryside character; gateway to National Forest compromised. • Community & Wellbeing: ○ Ratby already had 574 new homes in 3 years; proposal adds 470 more → 40% growth. ○ Loss of recreational space; mental health concerns. ○ Fear of village merging with Groby/Kirby Muxloe. • Policy Conflicts: ○ Contradicts multiple DM policies (1, 3, 4, 7, 11, 17) and NPPF principles. ○ Lack of cumulative impact assessment; failure to plan strategically.

Table 19: SP02: Development Strategy Omitted Sites

Policy/Section	Main Issues Raised
Bagworth: LPR71	General Comment • Chapter 2 outlines the merits of the promoted site.

	• Site is suitable, available, and deliverable within 5 years. • Request for inclusion as a draft housing allocation in the emerging Local Plan. • Persimmon Homes North Midlands committed to delivering the site within five years of plan adoption. • Development will help meet housing needs in Hinckley and Bosworth.
Barlestone: LPR126	General Comment • Site & Proposal: 3.5 ha site on Newbold Road; current application for 60 homes with landscaping, LEAP, and community orchard. • Access & Highways: Access via demolition of No. 68; Stage 1 Road Safety Audit approved; PROW diversion supported by LCC. • Constraints: Flood Zone 1, no heritage or ecological designations, single ownership, no technical barriers to development. • Infrastructure & Services: Healthcare contributions agreed; no GP capacity issues; Barlestone is a Key Rural Centre with school, shops, GP, and bus links. • Deliverability: Site promoted in Neighbourhood Plan; Maruti Developments committed to high-quality, mixed-tenure housing. • Spatial Strategy: Supports balanced growth; smaller rural sites needed for early delivery alongside urban allocations.
Barlestone: AS4241	General comment • Barlestone as a Key Rural Centre: Serves its residents and surrounding rural hinterland with hourly bus links to Hinckley, Leicester, Ashby, Ibstock, and Coalville. • Local Services: Village centre has a Co-op (with Post Office), hairdressers, takeaways, a restaurant, and a pub; additional amenities include a doctor's surgery, dental practice, and newsagent outside the centre. • Employment Gap: No employment provision in the village; identified as a weakness in the Core Strategy, but previous proposals for employment land have not been approved. • Housing Allocation Potential: SHELAA site AS4241 is suitable, available, and sustainable; estimated capacity for 100–120 dwellings on approx. 4 hectares, with planning

	permission already resolved for 49 dwellings on part of the site. • Planning & Impact Assessment: Access deemed safe; no significant impact on highways, drainage, biodiversity, heritage, or landscape; structural landscaping will mitigate visual impact. • Strategic Importance: Site offers opportunities for public open space, play areas, improved habitats, and footpath connectivity; considered more appropriate than current draft allocation at Barton Road and recommended for inclusion in the Local Plan.
Barlestone: AS53B	General Comment • Appendix 1 – Portfolio of Sites Vision Document • Purpose: Gladman outlines sites they are promoting for residential development in Hinckley & Bosworth, both small-scale (under 100 dwellings) and larger strategic sites. • Key Principles: ○ All sites are controlled by Gladman, with no ownership constraints. ○ Sites are viable and deliverable, with development typically starting within 18–24 months of outline consent. ○ Commitments to biodiversity net gain (minimum 10%), green infrastructure, and community contributions (education, health, recreation). ○ Benefits of Proposed Sites: ○ Delivery of market and affordable housing. ○ Public open spaces, play areas, and integration with existing rights of way. ○ Economic benefits through increased local spending. • Land off Cunnery Close, Barlestone: Approx. 100 homes, sustainable extension to the village. Includes green infrastructure and improved access.
Barwell: LPR185	General Comment • Location & Size: 2.6-hectare site east of Kirkby Road, northern edge of Barwell. • Current Application: Planning ref. 22/00121/FUL for 92 dwellings (18 affordable), garages, gardens, open space,

	orchard, play area, pumping station, sub-station, SUDS pond, landscaping. • Status: Design issues resolved; access matters with highway authority nearing conclusion. • Land Quality: Grade 3b agricultural land (not Best & Most Versatile) – loss not a constraint. • Flood Risk: Flood Zone 1; low surface water risk – consistent with national policy. • Heritage: No listed buildings or conservation area; low archaeological potential – no heritage constraints. • Access: Via Kirkby Road – suitable for development. • Suitability: Adjacent to Barwell urban area; available and deliverable for housing to meet immediate needs. • Ownership: Controlled by Elan Homes; short-term housing solution. • Recommendation: Allocate site for residential development in Regulation 19 Plan.
Barwell: LPR75	General Comment • Remove from Green Wedge and Allocate for Housing: SHEELA site LPR75 is immediately deliverable. • Meets Current Housing Needs: Provides a mix of family homes, self/custom-build plots, and affordable housing. • Supports Barwell Regeneration: Addresses socio-economic issues and strengthens vitality of the district centre. • Delivers Environmental and Recreational Benefits: Multifunctional green space, biodiversity net gain, and improved countryside access. • No Technical or Infrastructure Constraints: Development can proceed without barriers. • Positive Contribution to Soundness: Helps meet NPPF requirements and correct flaws in the draft plan.
Barwell: LPR76	General Comment • Four live applications on the site are pending determination; most consultees are satisfied with submitted information. • Flood Authority's outstanding issue is resolved; Highways' request for further details is ongoing.

	• No objections have been raised by any consultee to date. • Proposed increase from 96 to 126 dwellings is marginal; net density of 38 dph meets HBBC Local Plan Policy HO04. • Design respects local character, includes open space and green infrastructure. • Developer has a strong track record; allocation ensures efficient land use and supports housing supply.
Burbage: LPR131	General Comment • Site Overview: Redrow is promoting 26.42 ha of land at Burbage Fields Farm for residential development, comprising nine greenfield parcels currently used for grazing, with existing farm buildings and two residences offering access via Coventry Road. • Location & Connectivity: The site adjoins Burbage's settlement boundary, is near the M69, and lies 250–700m from Burbage centre. It is well-connected to local facilities, schools, and public transport, making it a sustainable location for growth. • Planning Context: Initially not submitted in the 2019 Call for Sites, the land was later assessed in the SHELAA (2021) as 'suitable, available and achievable,' supporting its inclusion in the Local Plan Review. • Development Proposal: Vision Document and layout plan propose around 422 dwellings (including 20% affordable housing), 12 self-build plots, a residential care home, and extensive green infrastructure (approx. 50% of the site), with primary access from Coventry Road. • Design Principles: The scheme prioritises ecological corridors, retention of hedgerows and trees, noise buffers near the M69, and sustainable travel links via footpaths and cycleways, ensuring environmental enhancements and residential amenity. • Deliverability & Viability: No known constraints or abnormal costs; development could start by 2026 and deliver within the first five years of the plan period. Affordable housing will meet policy requirements, and Redrow's involvement ensures timely delivery.
Burbage: LPR133	General Comment

	• Avant Homes' Interest: Avant Homes holds a contractual interest in land at Lychgate Lane, Burbage (SHLAA Ref LPR 133). • Planning Status: The site gained Outline consent via appeal on 30 October 2023 (Ref: 22/00192/OUT) and Reserved Matters approval for 79 dwellings on 25 July 2024 (Ref: 24/00179/REM). • Current Progress: Conditions are being discharged, with site commencement expected in early 2025. • Request for Allocation: Avant Homes urges the Council to formally allocate the site in the new Local Plan or at least show it as a committed residential development under Policy SP02. • Settlement Boundary: The settlement boundary should be extended to include the site, reflecting the current planning consent. • Justification: The principle of development was confirmed by an independent Planning Inspector, ensuring its appropriateness for inclusion in the Local Plan.
Burbage: LPR16	General Comment • The representation disputes the latest SHELAA assessment for the Site, arguing it is not unduly constrained. • Evidence submitted shows the Site is controlled by a single land promoter (IML) with full landowner support. • The Site could be delivered in the short to medium term, subject to a supportive policy framework and necessary consents. • The recommended delivery timeframe should be amended to 6–10 years, reflecting the scale of the proposal. • This recommendation aligns with SGP growth options and constraints mapping, which currently places delivery in the 2030s–2040s. • The representation outlines the case for allocation, emphasizing scale, sustainability, community benefits, economic benefits, and deliverability.
Burbage: LPR234	General Comment • Appendix 1 – Portfolio of Sites Vision Document

	• Purpose: Gladman outlines sites they are promoting for residential development in Hinckley & Bosworth, both small-scale (under 100 dwellings) and larger strategic sites. • Key Principles: ○ All sites are controlled by Gladman, with no ownership constraints. ○ Sites are viable and deliverable, with development typically starting within 18–24 months of outline consent. ○ Commitments to biodiversity net gain (minimum 10%), green infrastructure, and community contributions (education, health, recreation). ○ Benefits of Proposed Sites: ○ Delivery of market and affordable housing. ○ Public open spaces, play areas, and integration with existing rights of way. ○ Economic benefits through increased local spending. • Land at Sapcote Road, Burbage: Approx. 350 homes, significant green infrastructure and play spaces.
Burbage: LPR36	General Comment • Site Identification: The site is listed in the Council's Strategic Housing Land Availability Assessment (SHLAA) 2022 as LPR36, with a total area of 11.51 hectares. • Existing Permission: Part of LPR36 (8.92 ha) has reserved matters approval for 135 dwellings (Ref: 22/00636/REM), following outline permission granted on appeal (Ref: APP/KR420/W/20/3265143). • Additional Capacity: Davidsons' detailed layout work indicates the approved area can accommodate 23 extra homes while meeting policy requirements for housing mix, biodiversity net gain, and open space. • Policy Implication: These additional 23 homes should be factored into the Pre-Submission Draft of the Hinckley & Bosworth Local Plan to support borough-wide housing delivery. • Remaining Land: A 2.59 ha portion of LPR36 remains undeveloped; SHLAA identifies it as suitable, available, and achievable, and Davidsons confirm it can be delivered within 5 years.

	• Next Steps: The remaining land should be allocated for development as a logical extension of the urban area; updated red line and SHELAA proforma can be provided if required.
Desford: LPR151	General Comment • Vision: Bellway proposes a sustainable, landscape-led extension south of Desford to deliver housing and community benefits. • Objectives: Up to 500 homes (with smaller options for 250 or 170), affordable housing, strong connectivity, and green infrastructure. • Site Context: 41.9ha agricultural land, well-connected to local facilities and employment, low flood risk, and low biodiversity baseline. • Development Options: ○ Option 1 (Preferred): 500 homes, primary school, local centre, community building, green corridor, SuDS, and new link road. ○ Option 2: 250 homes, community building with health provision, large open space. ○ Option 3: 170 homes, open space and play areas, fewer facilities. • Design Principles: Landscape-led approach, improved connectivity, respect local character, and community-focused spaces. • Key Benefits: Addresses housing need, infrastructure improvements (school, healthcare, link road), enhanced green infrastructure, and recreation opportunities.
Desford: LPR194	General Comment • Site Location & Context: Land east of Cortanis Lane, Desford, promoted by Miller Homes; currently an agricultural field linked to Manor Hill Farm, bordered by residential development (west/north) and farmland (east/south). • Adjacent Development: Miller Homes previously delivered 80 dwellings on a nearby site allocated in the Desford Neighbourhood Plan (Policy H2), completed in 2020 under permissions 19/00149/OUT and 19/01416/REM.

	- Proposed Scheme: Up to 99 residential dwellings with access via Charity Close through the earlier Miller Homes development. - SHELAA Assessment: Site reference LPR86 (2022) – 3.73ha total, 3.17ha developable, estimated capacity of 95 dwellings; classified as suitable, available, achievable, and developable within 6–10 years. - Pre-Application: Engagement with HBBC completed (reference 24/10048/PREMAJ) for development of the site. - Recommendation: Site should be allocated in the Regulation 19 version of the Local Plan.
Desford: LPR24	General Comment - The main representation was accompanied by several supporting documents. - These included the Desford Development Strategy – Credentials Document. - A Transport Report was also submitted to reinforce the representation. - The additional documents aim to provide evidence and justification for the proposed development strategy. - They collectively strengthen the case by addressing planning and transport considerations.
Desford: LPR83	General Comment - Site Promotion: Jelson is promoting ~3 hectares of land south of Hunts Lane, Desford, for residential development, with an indicative capacity of around 105 dwellings and a proposed access point from Hunts Lane. - Context & Precedent: The site (Phase 2) lies adjacent to Phase 1 land where Jelson recently secured planning permission for up to 100 dwellings on appeal, reinforcing its suitability. - Policy Alignment: Desford is identified as a Key Rural Centre in the Draft Plan, considered a sustainable location for growth. The site is next to land allocated in the Desford Neighbourhood Plan and aligns with the Council's development strategy. - Availability & Deliverability: Jelson owns the entire site with no ownership or tenancy constraints. The land is available immediately, and Jelson intends to develop it directly, meeting NPPF deliverability criteria.

	• Suitability: The site is adjacent to the settlement boundary, close to services and employment opportunities, and has good transport links. No significant technical constraints have been identified. • Achievability: Access via Hunts Lane has been authorised under the Phase 1 application. Jelson, as an experienced local housebuilder, can secure planning permission and commence development promptly.
Desford: LPR85	General Comment • Site Details & Location: Land north of Hunts Lane, Desford (approx. 3.34 ha) proposed for ~80 homes, a GP surgery, and parking for both the surgery and adjacent cemetery. Located on the north-west edge of Desford, bordered by Hunts Lane/Newbold Road to the south, cemetery to the west, housing to the east, and farmland to the north. • Access & Constraints: Unrestricted access from Hunts Lane; no anticipated highway safety or capacity issues. Flood Zone 1 (very low flood risk), no heritage, landscape, or nature conservation designations; single landowner under option to Peveril Homes. • Infrastructure Need: Desford GP Surgery is over-subscribed and cannot expand on its current site (confirmed by Infrastructure Capacity Study Phase 2, July 2024). • Current surgery: 10 staff for 4,800 patients, only 3 consultation rooms, limited parking (5 staff spaces, 4–5 patient spaces). • Proposed Healthcare Solution: New surgery planned on site with 5–7 consultation/treatment rooms and 12–16 parking spaces. Potential integration with cemetery parking to address local concerns. • Sustainability & Connectivity: Desford identified as a Key Rural Centre with schools, shops, pharmacy, dentist, and regular bus service (Leicester–Market Bosworth). Site within walking distance of village amenities and well-connected by footpath. • Deliverability & Strategic Fit: No planning or technical constraints; site available for development within 5 years. • Supports local plan's spatial strategy for balanced growth in rural areas; Peveril Homes have proven track record in East Midlands.

Earl Shilton: LPR12**General Comment**

- Persistent shortage of small business units (185–370 sqm for industrial and office use) in Earl Shilton has been an issue since at least 2012, causing major employers to leave the borough.
- Employment Land Review (July 2024) confirms an ongoing need for employment land; existing urban areas have little available land, and regeneration for employment use is often unviable.
- Leicester Road application (22/00727/OUT) proposes 14 small units (231 sqm each, total 3,234 sqm) to meet short-term local needs; approval is pending a Section 106 Agreement.
- The site in question (2.05 ha) is proposed for mixed use: over 1 ha for B2 employment units and the remainder for 10 traveller pitches, making it suitable for strategic allocation under the Local Plan.
- Location advantages: sustainable urban area (Hinckley, Burbage, Earl Shilton, Barwell), strong transport links via A47, and previously developed land (Gypsy and Traveller site).
- Allocation would deliver economic, social, and environmental benefits, addressing deprivation hotspots, supporting local employment, and enabling habitat and flood risk improvements.

**Earl Shilton: LPR
56**

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- Location advantages: sustainable urban area (Hinckley, Burbage, Earl Shilton, Barwell), strong transport links via A47, and previously developed land (Gypsy and Traveller site).

	Allocation would deliver economic, social, and environmental benefits, addressing deprivation hotspots, supporting local employment, and enabling habitat and flood risk improvements.
Earl Shilton LPR57	General Comment • Appendix 1 – Portfolio of Sites Vision Document • Purpose: Gladman outlines sites they are promoting for residential development in Hinckley & Bosworth, both small-scale (under 100 dwellings) and larger strategic sites. • Key Principles: ○ All sites are controlled by Gladman, with no ownership constraints. ○ Sites are viable and deliverable, with development typically starting within 18–24 months of outline consent. ○ Commitments to biodiversity net gain (minimum 10%), green infrastructure, and community contributions (education, health, recreation). ○ Benefits of Proposed Sites: ○ Delivery of market and affordable housing. ○ Public open spaces, play areas, and integration with existing rights of way. ○ Economic benefits through increased local spending. • Land North of Earl Shilton: Approx. 700–750 homes, supported by community facilities and extensive green spaces.
Earl Shilton: LPR127	General Comment • Heavy reliance on strategic sites risks slow delivery and delays, as seen with Barwell and Earl Shilton SUEs (allocated in 2014, outline consent only granted in 2024, no homes delivered yet). • Manor Oak Homes supports allocating 10% small sites but urges increasing this proportion to ensure flexibility, quicker delivery, and avoid underperformance against housing targets. • A balanced approach with varied site sizes, including smaller sites capable of early delivery, is essential to meet housing needs, provide choice, and prevent repeating past delays.

Groby: AS705**General Comment**

- The proposed allocation of land at Laurel Farm for 45 dwellings is unnecessary and misguided.
- The area has a history of flooding due to poor surface water drainage, which previously required years of costly improvements.
- Properties on Marina Drive back onto Laurel Farm and are separated by an open watercourse, partly culverted, maintained by residents.
- Developing the fields that currently absorb rainfall will increase water flow into the watercourse, raising flood risk and requiring further mitigation.
- Residents will lose valued rural views and green space adjacent to Marina and Castle Parks.
- The borough already has surplus land for development, making this loss of amenity and increased flood risk unjustifiable for such a small housing gain.

Groby: LPR146**General Comment**

- Groby's Role in Settlement Hierarchy: Identified as a Tier 2 Key Rural Area in the HBLP Settlement Hierarchy. Provides a wide range of services: schools, healthcare, retail, recreation, and community facilities. Strong transport links to Leicester and surrounding villages via bus services (routes 27 and 28).
- Sustainability and Strategic Importance: Well-connected to Leicester, offering access to employment and higher-order services. Acts as a rural hub for surrounding settlements (Ratby, Markfield, Thornton, etc.). Meets NPPF objectives for promoting sustainable rural development.
- Issues with Current HBLP Approach: Regulation 18 HBLP does not allocate any development sites in Groby.
- This omission: Fails to support Government's aim to boost housing supply (NPPF para 60). Ignores local housing needs and Leicester's unmet housing requirement. Misses opportunity to deliver housing in the Borough's most sustainable locations.
- Need for Allocation critical to identify a large housing allocation in Groby to: Support rural vitality and local services. Respond to residual housing supply and Leicester's unmet needs. Align with NPPF guidance on rural growth (para 82).

	• Site Advantages: Direct access to Sacheverell Way, A46, A50, and M1. Close to bus stops with services to Leicester and nearby settlements. Located in Flood Zone 1 (low flood risk). No heritage or major ecological constraints; biodiversity net gain achievable. Public rights of way enhance connectivity to countryside. • Green Wedge Considerations: Current designation should not be a barrier to meeting housing needs. Development would include robust landscape strategy to prevent coalescence. Loss of Green Wedge would be minimal and offset by new public spaces and green infrastructure. • Benefits of Allocation: Delivers housing in a sustainable location. Provides enhanced recreational spaces, biodiversity improvements, and improved pedestrian links. Supports strategic housing delivery and rural community vitality.
Groby: LPR152	General Comment • Site & Location: 2ha arable land north of Groby Road, Anstey; on Hinckley & Bosworth edge, adjacent to Charnwood Borough. • Planning Context: Next to proposed Charnwood allocation HA43 (714 homes + school); logical extension opportunity. • Development Potential: Suitable for 42–49 dwellings (30–35 dph), mix including affordable housing; access via Groby Road or adjoining site. • Constraints & Designations: Flood Zone 1 (low risk), no statutory or historical designations; existing footpath crosses site. • Accessibility & Infrastructure: ~1km from Anstey centre; good local services and frequent bus links to Leicester; utilities available. • Deliverability & Benefits: Single ownership, viable within 5 years; supports local economy and services during and post-construction.
Groby: LPR227	General Comment • Adjacent Allocation: The site lies next to proposed allocation HA43 in the emerging Charnwood Local Plan (2021–2037), which includes ~714 homes, a primary school, and supporting infrastructure.

	• Site Characteristics: Located in Flood Zone 1 (lowest flood risk), with no statutory environmental or historical designations; a public footpath crosses the site east–west. • Development Potential: Capable of accommodating 383–447 dwellings at 30–35 dwellings/ha, with 70% developable area and 30% open space; includes affordable housing provision. • Accessibility & Services: About 1.1 km south of Anstey village centre (20-min walk), close to local amenities and schools; good public transport links (2–3 buses/hour to Leicester). • Suitability & Constraints: No listed buildings, contamination, or infrastructure constraints; utilities and broadband available; site is well-contained and adjacent to existing residential areas. • Deliverability & Benefits: Single ownership, viable, and achievable within 5 years; development would create construction jobs and support local services through increased household spending.
Groby: LPR49A and LPR49B	General comment • Strategic Location & Labour Market: The site is near Leicester and surrounding settlements (approx. 500,000 population), offering a strong labour pool and consumer market, plus local workforce access from Groby and Anstey. • Alignment with Growth Priorities: The employment park supports Leicester & Leicestershire Strategic Growth Plan objectives and addresses socio-economic and environmental challenges in the borough. • Socio-Economic Benefits: • ~2,440 gross direct FTE jobs on-site and 2,200 additional jobs (direct, indirect, induced), including 1,375 within the borough. • Occupational diversity from elementary to managerial roles. • £182M annual GVA boost (£153M within the borough) and significant business rates for HBBC. • Environmental Enhancements: • 8 hectares of new woodland, 2 miles of hedgerow and footpaths, 90% habitat and wetland increase.

	• 17 hectares of accessible recreational space, BREEAM Excellent buildings, renewable energy use, and EV charging points. • Deliverability & Infrastructure: Developer-led investment will provide enabling infrastructure (access, utilities, landscaping). IMP asserts the site can be delivered in years 1–5, earlier than SHELAA’s 6–10 year timeframe. • Scale & Market Impact: Mixed-use Park for I&L businesses to grow locally and attract regional/national occupiers, meeting long-term employment land needs. IMP has proven experience with major projects (e.g., Hinckley Park, Mercia Park).
Hinckley: LPR187 & LPR188	General Comment • The respondent submitted supporting information, including a location plan and an emerging masterplan, to promote allocation of the proposed sites. • The representation highlights the locational advantages and includes a green wedge assessment to justify suitability. • It asserts that both sites have limited development constraints, making them viable for allocation. • The emerging masterplan emphasizes a landscape-led approach that integrates green infrastructure and enhances recreational connectivity. • The proposal aims to strengthen the area’s recreational function and improve links to existing facilities to the east. • The respondent concludes that both sites offer clear opportunities for high-quality residential development and should be considered in the emerging Local Plan.
Hinckley: LPR144A	General Comment • Masterplan Submission & Housing Need: A Masterplan was submitted with the representation. BHL emphasizes that additional allocation sites are needed to meet the housing requirement and raises concerns about the application of the spatial strategy and site identification. • Spatial Strategy Principles: The strategy appropriately directs development to sustainable locations and uses a settlement hierarchy based on services and connectivity. The hybrid approach is justified as it balances urban and rural needs, strategic sites with infrastructure, and smaller sites for early delivery.

	- Concerns on Implementation: While the approach is robust, its application is inconsistent across the Borough. BHL highlights overlooked sites that could significantly contribute to housing needs. - Hinckley West Allocation: The allocation of land west of Hinckley West (c. 530 homes) is positive, leveraging Normandy Fields infrastructure. However, BHL argues that land north of Hinckley West should also be included to maximize the SUE's potential, delivering c. 105 homes plus green infrastructure. - Site Suitability: The northern site is sustainable and unconstrained served by Normandy Fields' road network, near key facilities, within flood zone 1, with no major heritage or ecological issues. Impacts on Wykin Hall Farmhouse can be mitigated through design. - Recommendation: The site should be allocated in the Regulation 19 HBLP to ensure logical development of Hinckley West and address housing needs. BHL invites further discussion with officers on its role in the spatial strategy.
Hinckley: LPR47	General Comment Strategic Location & Assessment: Middlefield Farm is in the most sustainable location in the Borough and was assessed positively in the Leicester & Leicestershire Strategic Growth Options (SGO) study (Aug 2024). It was identified as part of site 4d (Hinckley North) and deemed suitable for strategic growth only 6 out of 42 sites met this criterion. Established Development Principle: Adjacent land already has planning permissions (refs: 23/00432/OUT, 22/00318/OUT). Landscape sensitivity is medium, with mitigation reducing impact to minor-moderate. Accessibility & Services: The site is close to employment (Wheatfield Way industrial estate), Morrisons supermarket, and Hinckley Town Centre (1 km). It is on an existing bus route and supports walking/cycling access to health, education, and leisure facilities. Future Facilities: Development will provide critical mass for a local centre and primary school.

	• Technical & Policy Support: SHELAA (2022) identifies the site as suitable, available, and achievable. County Council and technical reviews found no major constraints (heritage, flood risk, or access). • Masterplan Potential: Approx. 600 dwellings, 2.05 ha primary school site, local centre, public open space (play areas, allotments, orchards), and green links to adjoining development. Confirms site is suitable and developable.
Hinckley: LPR48	General Comment • Strategic Location & Assessment: Middlefield Farm is in the most sustainable location in the Borough and was assessed favourably in the Leicester & Leicestershire Housing Market Area through the Strategic Growth Options (SGO) study (Aug 2024). Out of 42 sites, only 6 were deemed suitable, including this one. • Established Development Principle: Adjacent land already has planning permissions (refs: 23/00432/OUT and 22/00318/OUT), reinforcing the principle of development in this strategic area. • Accessibility & Services: The site is close to major employment areas, a Morrisons supermarket, and Hinckley Town Centre (1 km away). It benefits from an existing bus route (7/7a) and good walking/cycling access to health, education, and leisure facilities. • Capacity for Local Infrastructure: Development will provide critical mass for new services, including a Local Centre and a primary school site. • Technical & Policy Support: SHELAA (2022) identifies the site as suitable, available, and achievable. County Council reviews found no technical, heritage, or flood risk constraints, and safe access is confirmed by highway engineers. • Masterplan Potential: Current plans show capacity for ~600 dwellings, a 2.05 ha primary school site, local centre, public open spaces (play areas, allotments, orchards), and green links to integrate with southern development.
Hinckley: New Site	General Comment • Site Details: Sparkenhoe Business Centre (site ref: HIN130) is located on Southfield Road, Hinckley, covering 0.68 hectares (1.68 acres).

	• Building Condition: The Centre occupies a pre-war industrial building lacking modern amenities, with poor energy performance and nearing the end of its serviceable life. • Current Issues: Severn Trent Water is constructing a 14m deep sewage storage tank in the lower car park, further impacting occupancy and viability. • Employment Land Review: Classified as Grade B, but the owner argues it should be Grade C due to its unsuitability for modern business needs, high heating costs, and predominantly residential surroundings. • Occupancy & Sustainability: The Centre is the only employment use in the area, with falling occupancy levels making continued operation unsustainable. • Redevelopment Proposal: Suggests residential development in line with surrounding housing, estimating 60+ units at 90 dwellings/ha, potentially higher if flats are approved.
Market Bosworth: LPR127	General Comment • Appendix 1 – Portfolio of Sites Vision Document • Purpose: Gladman outlines sites they are promoting for residential development in Hinckley & Bosworth, both small-scale (under 100 dwellings) and larger strategic sites. • Key Principles: ○ All sites are controlled by Gladman, with no ownership constraints. ○ Sites are viable and deliverable, with development typically starting within 18–24 months of outline consent. ○ Commitments to biodiversity net gain (minimum 10%), green infrastructure, and community contributions (education, health, recreation). ○ Benefits of Proposed Sites: ○ Delivery of market and affordable housing. ○ Public open spaces, play areas, and integration with existing rights of way. ○ Economic benefits through increased local spending.

	Land York Close, Market Bosworth: Approx. 100 homes, logical extension to Market Bosworth. Includes play areas and biodiversity enhancements.
Market Bosworth: LPR149	General Comment - Appendix 1 – Portfolio of Sites Vision Document - Purpose: Gladman outlines sites they are promoting for residential development in Hinckley & Bosworth, both small-scale (under 100 dwellings) and larger strategic sites. - Key Principles: - All sites are controlled by Gladman, with no ownership constraints. - Sites are viable and deliverable, with development typically starting within 18–24 months of outline consent. - Commitments to biodiversity net gain (minimum 10%), green infrastructure, and community contributions (education, health, recreation). - Benefits of Proposed Sites: - Delivery of market and affordable housing. - Public open spaces, play areas, and integration with existing rights of way. - Economic benefits through increased local spending. - Land East of Shenton Lane, Market Bosworth: Up to 90 homes, well-integrated design with green spaces.
Market Bosworth: LPR32	General Comment - Site Details: Approximately 0.55 ha of pastoral land south of Cedar Drive, Market Bosworth; currently accessed via a gate at Cedar Drive's end. - Boundaries: Trees to the south, dwellings to the north, agricultural fields to the west, and Market Bosworth Country Park to the east. - Designations & Constraints: Located in Flood Zone 1 (lowest flood risk); no statutory environmental or historical designations; not within important views, vistas, or local green space. - Neighbourhood Plan Context: Classified as countryside beyond the assessment boundary; not allocated for any

	specific purpose; listed buildings in Market Bosworth are distant and unaffected. • Development Potential: No technical constraints; Council's SHELAA confirms suitability, availability, and achievability; development considered deliverable within 5 years (earlier than SHELAA's 6–10 years). • Settlement Role: Market Bosworth is a Key Rural Centre, the second most sustainable tier in the borough making it an appropriate location for further development.
Markfield: LPR32	General Comment • SHELAA Assessment: Site LPR32 has been assessed through SHELAA and confirmed as suitable, available, and achievable for development. • ELR Review: The Employment Land Review (ELR) also assessed the site's availability and suitability, but Appendix 7 scored it low for deliverability. • Deliverability Evidence: Despite the low score, a consortium of willing landowners led by an experienced developer exists, and an outline planning application for employment units (Ref: 23/01090/OUT) is currently under consideration by Hinckley and Bosworth Borough Council. • Council Recommendation: The ELR recommends allocating site LPR32 for employment "in whole or in part," raising questions about why it was not allocated compared to less-favoured sites in the Local Plan. • Expert Evidence: Client-commissioned landscape and transport assessments provide robust evidence supporting suitability; landscape analysis shows LPR32 lies in a quarry-influenced area of low condition, where industrial development aligns with character. • Access Feasibility: Proposed access includes a signal-controlled crossroads on the A511 (400m west of M1 J22) and a secondary ghost island T-junction from Cliffe Lane, ensuring safe distances from major junctions and improved site connectivity.
Markfield: LPR43	General Comment • Concern with Current Approach: Limiting consideration to non-strategic major sites over 100 homes overlooks smaller major sites that could deliver sustainable growth and added benefits.

	• Questionable Allocations: Sites in Appendix 3 propose housing only, without on-site infrastructure, offering no advantage over smaller sites; their suitability for accommodating growth is questioned. • Neighbourhood Plan Evidence: Local questionnaire results show strong community preference for sites south of London Road and off Hill Lane (LPR43), with only a small margin between them. • LPR43 Advantages: Land off Hill Lane is close to Markfield's centre (350m), adjoins built-up areas on three sides, and can deliver ~75 homes with open space, play area, and ecological design. • Technical Assessments Support Suitability: Previous application included landscape, ecology, flood risk, heritage, noise, and transport studies, all confirming the site's deliverability, low impact, and compliance with biodiversity and drainage requirements. • Deliverability and Community Benefit: The site is viable, available within five years, and aligns with Neighbourhood Plan priorities, including a new footpath along Hill Lane, making it well-placed for additional growth.
Markfield: LPR93	General Comment • Site Location & Size: Jelson is promoting a 1.62-hectare site south of Forest Road, at the western end of Markfield, supported by Development Framework and Constraints/Opportunities Plans (Appendices IV & V). • Availability: The land is under Jelson's control, making it immediately available for development. It is well-connected to local services in Markfield, a sustainable location for housing growth. • Development Potential: The site could accommodate up to 30 dwellings, with delivery expected within 1–2 years and faces no significant development constraints. • Technical Assessments: Investigations include a Highways Technical Note confirming access via London Road and negligible traffic impact from the proposed scale of development. • Achievability: No technical or ownership barriers exist; the site meets NPPF tests for deliverability and viability. • Alignment with Strategy: Jelson asserts the site is suitable, available, viable, and consistent with the Council's spatial

	strategy, requesting its allocation for early housing delivery in the Plan period.
Markfield: LPR49B	General Comment • Site Promotion: Jelson submitted a call for sites in May 2024 for land south of London Road and west of Ratby Lane, proposing mixed uses including housing, care home, retail, and community facilities. • Framework Plan: A development framework now shows potential for ~95 homes, a food store, and 0.9 ha for community uses (e.g., cemetery space or recreation). A care home could replace some housing or open space. • Community Use Adjustment: The plan relocates previously approved community land eastward, replacing it with housing, while maintaining overall community provision. • Retail Need: Retail in Markfield has not kept pace with growth; improved daily shopping options are needed to reduce reliance on out-of-village trips. • Evidence of Demand: The 2019 householder survey (Markfield Neighbourhood Plan) found 77% of respondents wanted more shops; the draft plan overlooks this need. • Deliverability: Jelson asserts no ownership or technical constraints exist, and mixed-use development would enhance settlement sustainability.
Markfield: LPR96	General Comment • The spatial strategy in the proposed Local Plan is broadly sound, but it must include a buffer above the minimum housing requirement and clarify that the requirement is a minimum figure. • The Plan appropriately addresses Hinckley and Bosworth's housing needs and a share of Leicester's unmet need. • Heavy reliance on large urban sites makes it essential to retain smaller-scale rural allocations, which are more deliverable and support early housing supply. • Growth in the North East of the Borough, particularly around Markfield, is critical to meeting Leicester's unmet need near its origin, leveraging strong transport links and sustainability benefits. • The Site offers good local amenities and transport connectivity, including bus services within 500m that link to major settlements.

	The masterplan is landscape-led, with generous green infrastructure, connectivity to adjacent land, and provisions for play areas, diverse housing types, and tenure mix to meet local needs.
Newbold Verdon: AS455	General Comment - Appendix 1 – Portfolio of Sites Vision Document - Purpose: Gladman outlines sites they are promoting for residential development in Hinckley & Bosworth, both small-scale (under 100 dwellings) and larger strategic sites. - Key Principles: - All sites are controlled by Gladman, with no ownership constraints. - Sites are viable and deliverable, with development typically starting within 18–24 months of outline consent. - Commitments to biodiversity net gain (minimum 10%), green infrastructure, and community contributions (education, health, recreation). - Benefits of Proposed Sites: - Delivery of market and affordable housing. - Public open spaces, play areas, and integration with existing rights of way. - Economic benefits through increased local spending. - Land South of Desford Road, Newbold Verdon: Approx. 24 hectares, potential for phased development. Includes recreational spaces, allotments, and community orchard.
Newbold Verdon: LPR190	General Comment - Site Details: Land east of Brascote Lane and south of Arnold's Crescent, Newbold Verdon, covers approx. 6.86 hectares and could deliver around 135 homes with associated infrastructure and landscaping. - Context & Connectivity: The site adjoins the existing settlement boundary and Phase 1 development (239 homes), forming a logical second phase. Vehicle and pedestrian access will link through Phase 1 and public rights of way, providing direct connections to the village.

	• Constraints & Suitability: Located in Flood Zone 1 (low flood risk), with no heritage, landscape, or ecological designations. No ownership or technical constraints; the site is available and suitable for short-term development. • Settlement Sustainability: Newbold Verdon is a Key Rural Centre offering schools, healthcare, shops, and public transport links to Leicester and Market Bosworth. Walking routes are considered attractive and usable. • Infrastructure Capacity: Local primary school has significant capacity to accommodate additional pupils, supporting further development. • Benefits & Deliverability: Development would provide market and affordable housing, open space, green infrastructure, and ecological enhancements. Promoter has a strong track record, ensuring quick delivery aligned with the spatial strategy for balanced rural growth.
Newbold Verdon: LPR207	General Comment • Site suitability: Land off Bosworth Road is a greenfield site with no insurmountable constraints, located within Flood Zone 1 (lowest flood risk), and free from landscape or ecological designations. • Housing delivery: Capable of providing 200–220 new homes on 8.74 hectares, including 40% affordable housing (80–88 dwellings). • Design approach: Landscape-led, pedestrian-friendly development retaining and enhancing existing green networks, adding tree planting, buffers, and biodiversity features. • Community benefits: Includes new public open spaces, play areas, SuDS, and improved connectivity to the wider Public Rights of Way network, promoting active travel and sustainable transport. • Accessibility: Well connected to local facilities (schools, shops, pharmacy, sports club) and public transport (bus route 153), with a clear vehicular and pedestrian access strategy minimizing village traffic. • Strategic fit: Represents a logical extension to Newbold Verdon, supporting housing needs in the emerging Local Plan while enhancing local character and sustainability.
Newbold Verdon: LPR98	General Comment

	• Site Location & Reference: Land north of Barlestone Road, Newbold Verdon (2022 SHLAA ref: LLPR98). • Size & Current Use: Approximately 13.9 hectares (34.35 acres) of agricultural grazing land. • Access: Two existing access points from Barlestone Road. • Development Potential: Immediate residential development opportunity, deliverable within the next 5 years. • Constraints & Assessment: 2022 SHELAA identifies the site as suitable, available, achievable, and developable with limited constraints. • Supporting Material: Updated Site Promotion document submitted alongside the representation.
Norton Juxta Twycross: LPR231	General Comment • The respondent has submitted extensive supporting documentation to promote the allocation of site LPR231 through the call for sites process. These include a Delivery Plan, Masterplan, and various technical appraisals (biodiversity, transport, social infrastructure, climate change, foul water strategy, historic environment, etc.). The representations argue that the current spatial strategy and evidence base in the CDP do not adequately consider the potential for a larger new settlement of around 10,000 dwellings as a sustainable growth option. They highlight issues with transport and education infrastructure in the south of the borough and propose that a new settlement at Norton Juxta-Twycross could address these challenges by offering self-containment, modal shift, and meeting a significant portion of housing need. • On-site secondary school: Capacity for 1,670 pupils (11+ FE), reducing need for off-site travel. • Self-contained community: Includes primary schools, high street, medical centre, sports facilities. • Strategic location reducing pressure on constrained southern road networks and improving regional accessibility. • Delivery by an experienced master developer with a comprehensive plan and stewardship model. • Transport analysis indicates the development would internalize most trips, significantly reducing reliance on the A5 corridor compared to proposed allocations like Lindley Meadows. Overall, the proposal is positioned as

	deliverable, sustainable, and capable of meeting housing and employment needs within the plan period. Support (for the site not being an allocation) NWL acknowledges and welcomes that no new settlement is proposed near Twycross. If this changes, NWL seeks detailed discussions to address all potential impacts, including cumulative effects, on the district.
Stoke Golding: AS534	General Comment - Site Overview & Merits: The respondent outlines the planning merits of the promoted site and its alignment with the proposed spatial strategy. - Soundness of Spatial Strategy: The spatial strategy in the draft Local Plan is generally considered capable of being found sound. - Housing Requirement: Emphasis is placed on ensuring a sufficient buffer above the minimum housing requirement and clarifying that the requirement is a minimum within the Plan. - Addressing Housing Needs: The Plan's provision for both the Borough's housing needs and Leicester's unmet needs (attributed to Hinckley and Bosworth) is welcomed. - Reliance on Urban Areas: Heavy reliance on urban areas and surrounding land for large-scale housing delivery highlights the need for smaller-scale allocations elsewhere. - Balanced Growth Approach: Smaller-scale sites outside main urban areas are seen as more deliverable and essential for early plan years, supporting a balanced growth strategy including rural areas.
Stoke Golding: LPR1	General Comment - Site Promotion: Jelson is promoting a 2.5-hectare site west of Hinckley Road, on the northern edge of Stoke Golding, for residential development (approx. 35 dwellings). - Strategic Location: Stoke Golding is a Key Rural Centre in the Settlement Hierarchy, suitable for additional housing growth with good access to Hinckley and local services. - Availability & Deliverability: Jelson has an option agreement with the landowner; the site is immediately available, and Jelson can deliver development promptly upon planning approval.

	• Suitability: The site is adjacent to the built-up area, within walking distance of schools, shops, and healthcare. It is well-contained by defensible boundaries and offers logical rounding off of the settlement. • Infrastructure & Constraints: No significant infrastructure or policy constraints; green infrastructure (0.5 ha) will provide buffers and maintain separation from Dadlington. Landscape impact considered minor and mitigable. • Achievability & Alignment: Jelson is an experienced local builder with proven delivery in the region. The site aligns with the Council's spatial strategy and meets NPPF deliverability tests, making non-allocation in the draft plan unsound.
Stoke Golding: LPR189	General Comment • Chapter 2 Representation: Outlines the merits of the site being promoted by the respondent. • Habitat Survey: A recent survey was conducted to assess whether the site meets Local Wildlife Site (LWS) criteria. • Environmental Considerations: Findings from the habitat survey are included in the response to support site suitability. • Site Capacity: The proposed development could accommodate approximately 40–50 dwellings. • Supporting Evidence: The representation provides detailed justification for the site's promotion. • Focus on Compliance: Emphasis on meeting ecological and planning requirements for development.
Stoke Golding: LPR41	General Comment • Location & Size: The site is 5.52 ha of agricultural land south of Stoke Golding, east of Wykin Lane/Stoke Lane, adjacent to permitted residential development and a solar farm. • Proposed Capacity: Approximately 65 dwellings, including a mix of smaller homes (1–3 bedrooms), public open space, and landscaping. • Accessibility & Services: About 400m from the village centre (5-minute walk), close to schools, shops, GP surgery, and served by the No. 66 bus route to Hinckley and Nuneaton.

	• Environmental & Heritage Context: Within Flood Zone 1 (low flood risk), bounded by hedgerows and trees; no statutory designations on-site, but two Grade II listed structures and a scheduled monument nearby. • Infrastructure & Viability: No known constraints utilities, broadband, and highways are adequate; site is available, achievable, and viable for development within five years. • Design & Integration: Development would form a logical extension to the settlement, well-contained by existing landscape features, with pedestrian links to the village and adjoining scheme.
Thornton: AS33	General Comment • Site Location & Context: The proposed site lies just outside Thornton's settlement boundary but adjoins existing residential areas on three sides, forming a logical extension to the village. • Settlement Role: Thornton is reclassified from a 'Key Rural Centre' to a 'Rural Village' in the draft Local Plan, recognized for its strong range of local facilities and good public transport. • Previous Assessments: The site (2.09 ha) was assessed in 2020 and 2022 as suitable, available, and achievable for up to 53 dwellings, and is included as draft allocation THO02H in the Local Plan. • Sustainability & Deliverability: The site is considered the most sustainable option in Thornton due to minimal constraints and proximity to services, supporting early housing delivery. • Developer Commitment: MyPad Group, an experienced East Midlands developer, is promoting the site and has engaged with the Council to deliver a 100% affordable housing scheme based on identified need. • Strategic Importance: Smaller-scale rural allocations like this are critical to meeting housing supply in the early plan period, complementing reliance on larger urban sites.
Witherley: AS585	General Comment • Site AS585 remains a deliverable site for allocation at the Regulation 19 stage. • The site was previously submitted through the Call for Sites process.

	• Appendix 8 of the SHELAA concludes that AS585 is a developable site. • The site has potential to deliver approximately 69 homes. • The promoter welcomes further discussions with the Local Planning Authority (LPA) as the Regulation 19 draft is prepared. • The intention is to ensure the site's inclusion in the Regulation 19 allocation.
Witherley	General Comment • Site Reference: AS586 • Application Details: Resolution to grant outline planning permission for up to 50 residential dwellings with access (Ref: 22/01190/OUT). • Status: Planning permission has been resolved to grant, indicating strong commitment. • Delivery Timeline: The site is considered deliverable within the next 5 years. • Classification: Can be treated as a committed site for housing supply purposes. • Nature of Development: Residential scheme, outline stage, with access included.

Appendix C: Detailed Consultation Responses

See separate document.