

Hinckley & Bosworth Local Plan

Regulation 18 | Autumn 2025

Leicestershire County Council Response

Note: These comments should be read in conjunction with the County Council comments on the 2024 version of the Regulation 18 Plan, as set out in a [report to the County Council's Cabinet in September 2024](#).

	Overarching Comments
	Whilst the County Council supports the principle of a plan-led approach to the delivery of new development, it expects Hinckley & Bosworth BC to work with the County Council to develop a set of robust policies and ensure that: i. The Local Plan needs to include an appropriate and robust mechanism for securing and collecting developer contributions and delivering key infrastructure. This reflects the need to meet the concerns raised in previous County Council Cabinet reports (including October and November 2024 Cabinet reports) regarding sufficient funding to deliver infrastructure. ii. The Local Plan reflects the draft key 'policy positions' of the proposed ETCS and demonstrates how the Local Plan will help to deliver on the Core Themes and Policies of LTP4. iii. The Local Plan's transport evidence base is sufficiently developed by the time that it is ready to be submitted for Examination in Public. iv. The proposed A5 Concept Link is appropriately included in the Local Plan, including to safeguard its future delivery and to identify an approach to its funding. v. Viable education solutions are established for the proposed housing allocations intended to be taken forwards to Regulation 19. The County Council will continue to work with Hinckley & Bosworth BC and other organisations (such as National Highways) to find ways to address infrastructure challenges. However, this is without prejudice to any future views that it might express at later stages of the Local Plan's development and on any planning application(s) relating to the proposed allocation sites. The County Council continues to support in principle a (local) plan-led approach to the delivery of new development; it represents the best way to seek to coordinate the delivery of growth with the delivery of necessary infrastructure and services (transport or otherwise). This in comparison to an unplanned, speculative development approach. It remains

committed to seeking to work in partnership with Plan-making authorities to develop and to secure the successful adoption of Plans; this increasingly in circumstances beyond the Plan-making authority's and (Local Transport Authority) LTA's control, e.g. as was acknowledged in the LTA's response to the 2024 version of the Reg18 Plan.

Having said that, the LTA is on record (as an example in this [report to the County Council's Cabinet](#)) as stating that unless there are significant changes in societal behaviours and expectations there will be limits on the extent to which the travel demand impacts of population and economic growth can be mitigated.

In the light of this, the LTA is in the process of developing an Enabling Travel Choice Strategy (ETCS) as part of its full [Local Transport Plan \(LTP4\)](#). In essence, the ETCS will be built around the concept of seeking to understand how and where people living and working in existing and future communities and business in Leicestershire will need to travel and then:

- seeking to deliver the most appropriate choices of travel to enable that demand; and/or
- looking at how services and facilities could be brought closer to communities to improve travel choices (e.g. because distances become walkable or cyclable).

Please see a report to the County Council's Cabinet 28 October 2025 '[Delivering the Local Transport Plan \(LTP4\) 2025 -2050 Next Steps' \(Item 5\)](#) for further information on the LTA's ETCS and its draft key 'policy positions' relating to, amongst other things, the Local Plan development process. The LTA will welcome the opportunity to discuss with Hinckley and Bosworth Borough Council (the Borough Council) how these key 'policy positions' might be reflected through the development of the Reg19 version of the Plan.

Since the previous Regulation 18 consultation, the LTA's [LTP4 Core Document](#) (LTP4 CD) has been approved by the County Council. The LTA will expect the Reg19 Plan version to demonstrate how it will help to deliver on the LTP4 CD's Core Themes and Policies.

Finally also since the previous consultation, via a report on the [Charnwood Local Plan in October 2024 the County Council's Cabinet](#) approved a set of principles for the LTA's [or LHA as referenced in the report] future engagement in other local plan processes. The LTA will welcome the opportunity to discuss with the Borough Council how these principles have been addressed/will be addressed through the development of the Reg19 version of the Plan.

As part of the pilot Strategic Health Impact Assessment (HIA) for local plans, Leicestershire County Council's Public Health team is working in close collaboration with planning colleagues at Hinckley and Bosworth Borough Council to inform policy development. A comprehensive Strategic HIA report was submitted to the council in 2024, and work is now underway to produce an additional chapter focusing on policies most relevant to health and wellbeing outcomes. The objective is to ensure that policy wording is as clear, precise, and robust as possible from a health perspective, with recommendations integrated directly into the planning process to improve health outcomes and reduce health inequalities. This work

	remains ongoing as part of our commitment to strengthening health considerations within local planning frameworks.
3	What is the Local Plan? (and further contextual info)
	Page 10, paragraph 3.8. As was recognised in the LTA's response to the 2024 version of the Reg18 Plan, the Borough Council is a partner in the South Leicestershire Joint Transport Evidence Work, which has examined the impacts of future growth across the south of the County and identified potential strategic transport mitigation measures. However, at this time the impacts of the Plan's spatial strategy have still not been assessed in isolation. It will be essential to securing the LTA's continued support for the Plan for this aspect of its evidence-based to be sufficiently advanced by the time of the Reg19 Plan's publication. The LTA welcomes the ongoing discussions with the Borough Council in this regard. Page 13, para' 3.14 sixth bullet point. The LTA welcomes that the Plan now covers a period up to 2045. This provides a greater degree of long term 'certainty' in respect of spatial planning, which in turn will assist the LTA in planning for the longer term travel needs of the County's growing population; albeit seeking to provide for such will continue to be challenging (as per the LTA's overarching comments). Page 13, para' 3.17 - The last line is missing the word 'used' – 'used in decision-making on planning applications'.
4	Spatial Portrait
	Page 26, para' 4.28: Caution should be exercised in quoting travel to work data from 2021 as it may not provide representative data regarding 'normal' travel patterns, WFH etc. given that the Country was still in the grips of a pandemic at that time.
5	Vision and Objectives
	Page 31, the Vision: With reference to the '<i>...development of a new settlement...</i>', in line with the intention the LTA's proposed Enabling Travel Choice Strategy (ETCS), it will expect the Reg19 Plan to set out the Borough Council's Place Vision for this new settlement, particular with regard to future residents' access to service and facilities needs and how they are to be provided for over the lifetime of the site's development. (See also LTA comments on NEW03.) Page 33, Objective 5 Transport: In line with the intention of the LTA's proposed ETCS, it is suggested that this objective should be updated as follows: 'Travel and transport <i>To promote a pattern and form of development that will enable its future occupiers to have genuine and realistic choices of travel. For future residents that will be travel choices to services and facilities that they are most likely to require access to on a daily basis. For future business that will be travel choices that enable them to access the necessary pools of skilled labour.'</i>

	Page 33, Objective 6 Natural Environment: This objective should refer to the local Nature Recovery Network rather than the Local Nature Recovery Network. A small 'l' on local is required as there is not an official Local Nature Recovery Network. The Nature Recovery Network is an ambition of the Government and is intended to be delivered by a range of mechanisms including the Local Nature Recovery Strategy, BNG, biodiversity duty. These will be delivered locally and will contribute to delivering the national network of wildlife rich places which is called the Nature Recovery Network. Also having the 'L' of Local capitalised risks it being confused with the Local Nature Recovery Strategy.
6	General Development Principles
a	Policy REV01 Sustainable Development
	LCC generally support the Policy however it is suggested that specific reference to "Development that accords with the policies in the Local Plan (and, where relevant, with policies in neighbourhood plans or other development plan documents) will be approved without delay, unless material considerations indicate otherwise" which was in previous versions the policy, should be reinstated. It is also considered that there is the opportunity to link in with minerals and waste and the circular economy and sustainable development by the replacement of: • <i>'Making effective use of land'</i> with <i>'Making effective use of land, natural resources and waste'</i> on p. 35 <u>Strategic Property Services on behalf of the Council as a Landowner</u> Policy REV01 broadly follows the guidance set out in the NPPF (2025) at Paras 11 c) and 11 d). For completeness it needs to incorporate all aspects of Para 11 d) ii)
b	Settlement Hierarchy Methodology Review (see 4 Settlement Hierarchy Methodology Paper 2025 , item 9.  PDF 365 KB)
	The methodology underpinning the settlement hierarchy needs to be robust and logical given the settlement hierarchy that informs the underlying spatial development strategy of the Local Plan. The 'stretching out' of the settlement hierarchy from 6 tiers to 9 is considered to be desirable, enabling a distinction to also be made between the spatial location of settlements in addition to the level of services and facilities they offer. For example, it enables those settlements closer to or within the Principal Urban Area (PUA) around the City to be clearly distinguished from other settlements with a similar level of services and facilities and indicates scope for enhanced growth to be directed towards them to provide for the sustainable expansion of existing communities in close proximity to the City. The LTA has no particular views on the need for the Regulation 19 Plan to include a specific hierarchy policy. In terms of the methodology, the LTA would wish to see a robust approach taken, i.e. one that has a focus on the day to day services and facilities that people are likely to need to access and thence through the Plan's spatial strategy and policies seeking to enable that access by a range of transport modes (in accordance with the ETCS draft key

	'policy positions'). In particular, this consideration should be inherent to the Borough Council's visions for the new places that are to be created through the Plan's allocation of sites, including how they might address existing access issues through the delivery of new services and facilities and/or a need to rely on travel connectivity to such in the 'surrounding world'. <u>Strategic Property Services on behalf of the Council as a Landowner</u> It is noted that to date the settlement hierarchy within the Core Strategy 2009 has been used, it is therefore appropriate to update the methodology for determining the hierarchy to reflect the current level of services within individual settlements and the need to support existing services by the delivery of additional housing.
c	Site Selection Paper (see 5 Site Selection Paper 2025, item 9  PDF 158 KB) The Borough Council has engaged with the LTA thus far in seeking its views on allocation sites for possible inclusion in the Regulation 19 Plan. It would expect to be further engaged in the development of the Plan's transport evidence base and to ensure that the Regulation 19 version reflects access to services and facilities needs, as set out in the LTA's response on the Settlement Hierarchy Methodology Review. LCC note the use of waste safeguarding and historic landfills in assessment, but that there is no mention of mineral safeguarding. It would be helpful to clarify if this is an omission in the text, rather than the assessment. <u>Strategic Property Services on behalf of the Council as a Landowner</u> The site selection paper whilst describing the process to be followed does not set out how particular strategies were selected or rejected and similarly does not show the specific reason(s) for sites being selected or rejected.
d	Settlement Boundary Methodology Review Paper (see 6 Settlement Boundary Methodology Paper 2025, item 9  PDF 172 KB) The County Council is largely content with the Settlement Boundary Methodology Review Paper. Page 39, Para' 6.25 – Suggest including sentence about if any conflict between boundary changes and existing NP boundary occurs from any proposed changes that they will work in collaboration with the group/community to resolve these. <u>Strategic Property Services on behalf of the Council as a Landowner</u> The proposals within the plan are broadly supported.
e	Policy NEW01: Safeguarding Development Potential Page 42, para' 6.30 and page 43, para' 6.33 and page 44 Figure 9. The LTA welcomes that the Borough Council has responded positively to the A5 Concept Link report presented to the County Council's Cabinet in September 2025 [Item 43] by including reference to a potential/possible 'Hinckley Western Link Road' in this version of the Plan. The LTA and the Borough

	Council have started discussions about how best now to take this matter forward, such that the benefits of any link are demonstrated through the Plan's transport evidence work; it can be further defined and more definitively safeguarded through the Reg19 Plan; and the approach to its delivery/funding can similarly be set out through the Reg19 Plan (including through a Community Infrastructure Levy as necessary). Page 42, Policy NEW01: The LTA welcomes in principle the proposed 'Safeguarding Development Potential' policy and that it includes seeking to prevent development that would prejudice the delivery of key infrastructure required to support the current and future development in the borough. However, in terms of the detail of the policy: • strategic transport infrastructure should be explicitly mentioned in sub-section i; and • reference should also be included to not prejudicing the delivery of the Leicester and Leicestershire Strategic Growth Plan's spatial vision. Page 43, para 6.33: It is suggested that this paragraph could be expanded slightly to give a broad indication of the link road's purpose. Suggested addition as shown: <i>'The potential Hinckley western link road lies predominantly within the borough of Hinckley and Bosworth (although there is a small area that falls within adjacent Nuneaton and Bedworth borough along the A5). Its general purpose is to seek to facilitate future growth whilst limiting the impacts of growth on the A5 Dodwells and Longshoot junctions. It is at a very early stage in its initial development. A report on the matter is presented at the Leicestershire County Council Cabinet Meeting on 12 September 2025. The broad area relating to the proposed Hinckley western link road is shown in Figure 9 overleaf.'</i> <u>Strategic Property Services on behalf of the Council as a Landowner</u> The proposals within the plan are broadly supported.
7	Spatial Strategy
a	Policy NEW02: Provision of Overall Development
	Regarding the scale and distribution of housing, the Local Plan makes provision over the plan period (2024 to 2045) for 15,603 dwellings (743 dwellings per annum), which includes meeting a proportion of Leicester City's unmet need. This is considered to be an appropriate approach at the current time. The preference of the County Council is to direct housing and employment growth to the Hinckley area as it provides the greatest opportunity to provide for communities to access services and facilities using sustainable modes of transport, and to direct other growth further down the settlement hierarchy. There is ongoing significant concern regarding the two potential new settlements given the impact on the SRN and other uncertainties. LCC welcome Policy NEW02 and especially the bullet that development on unallocated sites will be supported where they • 'Are compatible with or do not adversely impact surrounding uses'

	It is hoped that this will safeguard extant mineral and waste sites from proximal development which may prevent them from expanding or operating. This would be in line with Policy W9 and Policy M11 of the LMWLP. <u>Strategic Property Services on behalf of the Council as a Landowner</u> Policy NEW02: Provision of Overall Development states that overall provision over the period 2024 to 2045 of 15,603 new homes (743 dwellings per year). This figure of 743 includes meeting a portion of Leicester City's unmet need. Table 2 sets out how this housing requirement has been calculated, it states that the housing requirement is actually 708 per year, but a 5 % buffer has been added to meet paragraph 78a of the NPPF. Plans should include over provision against their housing requirement or flexibility to account for housing delivery being slower than anticipated or sites not coming forward for development. This 2025 Regulation 18 consultation version of the Local Plan needs to read in conjunction with the version of the Plan consulted upon in September 2024 as they both include separate allocations. The council states that 2024 Plan includes provision for 7,884 homes. Taking account of windfall over the plan period (1392) and current commitments (2,560) and Neighbourhood Plan allocations 57 leaves a figure to be found of 3,710 homes. The 2025 Plan sets out the allocations to meet the figure to be found in Policy NEW03: Housing Development Sites. This policy sets out the amount each allocation is expected to deliver in the Plan period and this amounts to 4191. Taking the Council's housing provision figure at face value, this would give an overall provision of 16,084. As noted above the plan seeks to meet a housing requirement over the plan period of 15,603 new homes. If the Council's position is that their housing requirement is 743 homes per year, then the Plan includes flexibility of 3%. If the housing requirement is taken as 708 homes per year or 14,868 over plan period (which the Council may argue) then this would leave 8% flexibility. Whilst there is no national policy or guidance about a specific figure a 10-20% is usually considered reasonable, with 20% being appropriate if the supply includes large or complex sites as is the case in Hinckley.
b	Policy NEW03: Housing Development Sites

The LTA has previously questioned the active and sustainable travel credentials of the proposed Lindley Meadow allocation, because geographically it is poorly located in terms of accessibility by modes other than private car. Whilst the now further proposed allocation of 'Norton Heath' might address the LTA's other comment on the Lindley Meadow allocation (i.e. that the [Strategic Growth Options and Constraints Mapping for Leicester and Leicestershire](#) indicates that even a "co-dependent" new settlement needs to be in excess of 5,000 dwellings), that would only be the case if the two sites were developed as a single place. And, that would still not address 'Norton Heath's' equally questionable sustainable travel credentials.

It is challenging to see how this location can be enabled to be served by a sufficient range of realistic travel choices, given likely travel distances and patterns to services and facilities in the 'surrounding world' and the limited proximity of labour pools. Additionally, given phasing and viability considerations it is hard to see how a sufficient scale and mix of onsite societal and economic services and facilities will be deliverable 'upfront' to engrain trip internalisation from day one of occupation. Finally, it is also difficult to see how growth of this scale will be able to come forward without strategic scale investment in the A5 corridor.

At the very least a clear 'Place Vision' (as per the ETCS draft key 'policy positions') needs to be established for growth as a whole in this broad location; this will need to be consistent across boundary, i.e. between the districts of Hinckley and Bosworth and North West Leicestershire and to identify the site's (as one) likely relationships with the surrounding world. In turn a 'Place Vision' will inform an understanding of the site's travel demand implications and further in turn how that should be tested (modelled) as part of the development of the Plan's transport evidence base.

It will also be vital to engage with National Highways, and possibly other Government Agencies too, such as Homes England, to identify and agree prior to the publication of the Regulation 19 Plan a plausible route to the delivery of the likely scale of investment required in the A5 corridor to enable this scale of growth in this broad location.

The LTA looks forward to working closely with the Borough Council and other partners as necessary on seeking to find ways to address the significant travel and transport challenges posed by seeking to deliver growth at scale in this broad location. However, this is without prejudice to future views that it might express on the Regulation 19 Plan and any planning application(s) relating to these proposed allocation sites.

Education

Education colleagues have provided feedback to HBBC on all the suggested developments. All of these have been Red-Amber-Green (RAG) rated to highlight challenges associated with education infrastructure. LCC has yet to receive any indication of build rates or timings for the developments and in order to ensure we are providing the best solution, this information would be useful.

* Land South of the A47, Earl Shilton (LPR216): Amber: The primary solution here would be tricky if LRP200 does not also come forwards. 500 homes is not enough to warrant a new primary school, however a 2FE has already been decided for Earl Shilton SUE (on the other side of the A47) and S106 agreements are currently at the stage where this cannot be altered. A secondary solution may also be difficult, Heath Lane cannot expand to take all pupils from these developments, but a new secondary would require LPR200 and also homes in Stoney Stanton to come forwards. * Land South of Desford, Desford (LPR151A): Green: Expansion of Desford Primary School and Bosworth Academy would be needed, but this is a fairly simple solution. * New Settlement: Land off Atherstone Road (A444) and Ashby Road (B4116) 'Norton Heath' (LPR231 - in part, HBBC only): Amber: New provision would be needed for all stages of education. The reason it is amber is because there is no existing provision nearby and it would need to be considered how early an education provision could be provided as otherwise the first pupils living on the estate will face long journeys to existing schools. * Land South of Sacheverell Way, Groby (LPR146 A & B): Red: A primary solution is not easy for this site due to the existing Groby primaries being near capacity and none of them being able to be expanded. The number of houses does also not warrant a 1FE expansion. * Land South of New Barn Farm, Kirkby Road, Barwell (LPR185): Green: The pupils yielded from this development can be absorbed in existing schools. * Land West of Station Road, Bagworth (LPR221): Amber: Primary capacity is an issue in this area. Thornton Primary and Dove Bank Primary cannot be expanded any further. * Land off Barns Way and North of Leicester Lane, Desford (LPR86): Green: Expansion of Desford Primary School and Bosworth Academy would be needed, but this is a fairly simple solution. * Land South of London Road and West of Ratby Lane (Parcel B), Markfield (LPR94 B): Red: Mercenfeld Primary School is forecast to have a deficit of 96 places by 2029. This school cannot be expanded as it is on a constrained site. There is not enough pupils yielded by this development to warrant a new primary school. Stanton Under Bardon Community Primary School is the next nearest primary school and it does have a small amount of capacity (around 20 places) but is a very small school, again on a constrained site. * Land South of Arnolds Crescent, Newbold Verdon (LPR190): Amber: Newbold Verdon Primary School can be expanded to 3FE if required but cannot be expanded beyond that. Secondary numbers would impact an expansion at Bosworth Academy, Desford. * Land North West of Old Farm Lane and South of Bosworth Lane, Newbold Verdon (LPR207): Amber: Newbold Verdon Primary School can be expanded to 3FE if required but cannot be
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expanded beyond that. Secondary numbers would impact an expansion at Bosworth Academy, Desford.

* Land Between the A5 and Northwood Farm, Wood Lane, Higham on the Hill (LPR181):

Amber: This development is problematic in terms of a primary education solution. Higham on the Hill C of E Primary School is a 0.5FE school with a reducing amount of surplus places. There is not capacity for these pupils yielded in Higham on the Hill, with no other primary schools in a 2-mile radius. A solution could be a combined approach in LPR252, where Higham on the Hill primary school could be relocated and form a 2FE primary with pupils yielded from these developments and LPR252 which would make a more financially sustainable solution. We would welcome discussions with the developers regarding this option.

* Land off Oakfield Way and Meadow Close, Sheepy Magna (AS519): Red: There is no primary solution for housing in this area. Sheepy Magna C of E Primary School is a very small school, 0.5FE. It is at capacity and it cannot be expanded due to a constrained site. Witherley and Congerstone are the next nearest primary schools, but both of these are also small schools which do not have capacity to expand.

Minerals and Waste

LPR216 – Land South of the A47, Earl Shilton – the site is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. The site is also less than 300m from a safeguarded waste site (Earl Shilton STW, Document S4/2015, ref HK6) to the south west. Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

LCC note that LPR216 is expected to be delivered as part of a comprehensive development with previous Regulation 18 proposed site allocation on Land East of Earl Shilton (SHELAA site ref LPR200). LPR200 is in a MSA for Sand & Gravel. This is a huge amount of housing at some 2,513 homes. This will have a cumulative impact in conjunction with other sites.

LPR151 – Land South of Desford, Desford – the western half of the site is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a

Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. No waste safeguarding issues. LPR231 – Norton Heath (HBBC only) – the south western portion of the site is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. It also appears – but is difficult to ascertain at this scale – that the allocation includes the safeguarded waste site at Norton Juxta Twycross STW (Document S4/2015, ref HK15). This is inappropriate as it is contrary to Policy W9 of the LMWLP as amenity issues could prevent expansion or operation of the waste site. LPR146 A & B – Land South of Sacheverell Way, Groby – it appears that the allocation is partly within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. No waste safeguarding issues. LPR185* – Land South of New Barn Farm, Kirkby Road, Barwell – the allocation is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. No waste safeguarding issues. LPR221 – Land West of Station Road, Bagworth – the allocation is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. No waste safeguarding issues. LPR86 – Land off Barns Way and North of Leicester Lane, Desford – the allocation is outside the Mineral Safeguarding Area for Sand & Gravel to the east, but at its closest point is around 50m from it. This proximity could sterilise the mineral within this area. There is also a more distant (approx. 600m) Mineral Safeguarding Area (also for Sand & Gravel) to the west, separated by built development. No waste safeguarding issues.

LPR94 B – Land South of London Road and West of Ratby Lane (Parcel B), Markfield – the allocation is outwith the Mineral Safeguarding Area for igneous rock however this practically touches the southern end of the site. Therefore, at this proximity the allocation could sterilise the mineral within this area. No waste safeguarding issues. LPR190 – Land South of Arnolds Crescent, Newbold Verdon* – the allocation is within the Mineral Safeguarding Area for Sand & Gravel and is also within 500m of Newbold Verdon STW, a safeguarded waste site reference HK14 (Document S4/2015). Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. LPR207* – Land North West of Old Farm Lane and South of Bosworth Lane, Newbold Verdon* – the allocation is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. There is a safeguarded waste site (Newbold Verdon STW, ref HK14) within 900m to the south. Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. LPR181 – Land Between the A5 and Northwood Farm, Wood Lane, Higham on the Hill – the allocation is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. No waste safeguarding issues. AS519 – Land off Oakfield Way and Meadow Close, Sheepy Magna – the allocation is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected
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from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. No waste safeguarding issues. LPR241 – Land at Start Farm, Burbage – the allocation is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. No waste safeguarding issues. LPR16 A - Land South of Soar Brook, Burbage – the allocation is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. The allocation also surrounds a safeguarded waste site (Document S4/2015, Watling Street, Red Lion Farm, ref HK24) which is inappropriate as amenity issues could prevent the site from operating. This would be contrary to LMWLP Policy W9. LPR259 – Land East of Hinckley Park, Burbage – the allocation is within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. The allocation also is within 300m of a safeguarded waste site (Watling Street, Red Lion Farm, HK24) which is needs consideration as amenity issues could prevent the site from operating. This would be contrary to LMWLP Policy W9. LPR134 A - Land North of Glenfield, Groby (Parcel A) – the site is not within a Mineral Safeguarding Area. There is a more distant MSA for Sand & Gravel across the road at approximately over 500m away. The site is also around under 400m from the safeguarded waste site (Glenfield Auto Spares, Document S1/2015, ref B2) and approximately 650m from Glenfield STW (Document S1/2015, ref B23 [west]). <u>LLFA Comments on selected sites</u> Land South of Desford, Desford (LPR151A): 500 homes There are three significant surface water flow paths passing through the site from west to east. A sequential approach to the site layout should be taken, ensuring these blue corridors

	are preserved and enhanced. Measures should be incorporated to provide additional storage to reduce flood risk downstream to the Rothley Brook. BGS mapping indicates that much of the western portion of the site is underlain by sands and gravels and therefore greenfield runoff rates should be set accordingly. Opportunities to maximise the disposal of surface water to the ground should be taken. New Settlement: Land off Atherstone Road (A444) and Ashby Road (B4116), 'Norton Heath' (LPR231 - in part, HBBC only): minimum of 7500 homes (2,250 within the Plan period) It will be expected that a development of this nature will include strategic level sustainable surface water drainage and catchment management infrastructure which has the effect of reducing flood risk overall to the downstream River Mease. Land South of Sacheverell Way, Groby (LPR146 A & B): 170 homes Surface water flow path running through the middle of the site from north to south before joining the Rothley Brook. Sufficient space must be provided to enhance this area as a blue-green corridor, whilst demonstrating the reduction of flood risk downstream. Assess the risk posed by the watercourse/ditch shown on mapping adjacent to the A46, which is not presenting any risk on strategic level Flood Map for Planning. Land West of Station Road, Bagworth (LPR221): 46 homes Large area of surface water flood risk within the western portion of the site. A sequential approach to site layout should be taken. Consideration should be taken as to whether 46 homes are deliverable given the large area of flood risk. Land off Barns Way and North of Leicester Lane, Desford (LPR86): 94 homes Surface water flow path present along the southern boundary of the site. Sequential approach to site layout should be taken and opportunities to enhance the blue-green corridor should be explored. Land South of London Road and West of Ratby Lane (Parcel B), Markfield (LPR94 B): up to 95 homes Surface water flow path on the eastern boundary adjacent to Ratby Road. This risk will need to be assessed further, especially if using Ratby Road as a point of access to the site. It will need to be demonstrated that there is safe access and egress into the site for all events up to and including the design flood event (1 in 100 year plus climate change). Land off Oakfield Way and Meadow Close, Sheepy Magna (AS519): 58 homes No significant flood risk concerns within the red line boundary. BGS mapping indicates the underlying strata consists of sands and gravels. Drainage techniques which maximise infiltration opportunities should be considered, and greenfield runoff rates should be based on permeable soil conditions. <u>Neighbourhood Planning</u>
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The Local Plan makes numerous references to Hinckley & Bosworth BC's continued support and commitment for Neighbourhood Planning. It is a concern however, that despite stating that the Local Plan has been informed by 'actively progressing neighbourhood plans', there is no reference to the proposed 500 dwelling strategic site at Land South of Desford within the Desford Neighbourhood Plan Review currently out to consultation.

Strategic Property Services on behalf of the Council as a Landowner

The Council is proposing a strategy which relies on the delivery of strategic sites, including a new settlement at Twycross and a new settlement previously consulted upon at Lindley Meadows / Mira area. Further, there is no supporting evidence from either site promoter demonstrating deliverability for the strategic sites.

However, the Council has not published a Sustainability Appraisal Report which assesses reasonable options for the strategy for accommodating housing growth and has not provided a site-by-site assessment. Therefore, the council is yet to publish a justification setting out why its strategy or sites has been selected and alternatives rejected, thereby failing at present to meet the 'justified' test in the NPPF paragraph 36 b).

The Council has selected sites where its evidence demonstrates that they are not suitable.

The new settlement at Twycross was assessed through the Strategic Growth Options and Constraints Mapping for Leicester and Leicestershire (August 2023). Which concluded that:

- *"The site lies within the catchment of the River Mease, which is designated as both a SSSI and an SAC (River Mease SSSI / SAC). It is currently in unfavourable condition and is failing to meet its conservation objectives. As a result, there is currently little scope for development within the catchment without strategic mitigation".*
- *There is a concern about how the development will achieve sustainable travel patterns and avoid dependency on car use given its rural character and location, with very limited accessibility to Leicester*
- *Additionally, there is poor access to rail services, with the nearest station being Polesworth, approximately 7.3km south-westward with no viable accessibility by existing public transport provision.*
- *WPD has stated that this site is likely to require significant, extensive and lengthy works. Major reinforcement in the form of a Primary substation upgrade and/or a new primary substation, alongside extra high voltage network reinforcement.*
- *"... its discrete location some distance from larger settlements, means that local employment opportunities may be quite limited*

Further, the site would have significant difficulty in meeting the expectations of the NPPF at para 109, especially given the limited extent of the employment opportunities proposed.

Contrast the above with the findings of the same Study in respect of the proposed strategic development area north of Hinckley, including the County Council's land at Middlefield Farm, which was found to be suitable for strategic development especially given its proximity to

	services and facilities such as Hinckley town Centre, railway station and major road network. The Plan provides no evidence relating to the quantum or delivery of infrastructure and has not published any transport modelling or utilities assessment demonstrating that its proposal for two large new settlements is feasible or viable and that delivery can be achieved. This means that the Council's anticipated yield from each site cannot be relied upon in meeting the borough's housing needs. Cumulatively, the two new settlements would have a significant impact on the A5 corridor and require significant investment in infrastructure to mitigate their potential impacts.
c	Policy NEW04: Employment Development Sites. This draft Reg18 Plan proposes to allocate around 160 ha on three sites to the east of the A5/M69 Junction 1. This general location is not particularly accessible from a sustainable travel perspective, with the M69 creating a significant barrier for the most direct routes for walking and cycling for existing residents in the 'Hinckley area'. It also difficult to see how growth of this scale will be able to come forward without strategic scale investment in the A5 corridor. At the very least a clear 'Place Vision' (as per the ETCS draft key 'policy positions') needs to be established for growth as whole in this broad locations, including to consider the quantum and skills of employees that are likely to be required relative to existing available labour pools. In turn a 'Place Vision' will inform an understanding of the site's (as a whole) travel demand implications and in further turn how that should be tested (modelled) as part of the development of the Plan's transport evidence base. It will also be vital to engage with National Highways to identify and agree prior to the publication of the Reg19 Plan a plausible route to the delivery of the likely scale of investment required in the A5 corridor to enable this scale of growth in this broad location. The LTA looks forward to working closely with the Borough Council and other partners as necessary on seeking to find ways to address the significant travel and transport challenges posed by seeking to deliver growth at scale in this broad location. However, this is without prejudice to future views that it might express on the Reg19 Plan and any planning application(s) relating to these proposed allocation sites. <u>Minerals and Waste</u> LPR151A – the development site is partly within a Mineral Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

	LPR231 – Norton Heath (HBBC only) – the south western portion of the site is within a Mineral Safeguarding Area for Sand & Gravel. It also appears – but is difficult to ascertain at this scale – that the allocation includes the safeguarded waste site at Norton Juxta Twycross STW (HK15). This is inappropriate as it is contrary to Policy W9 of the LMWLP as amenity issues could prevent expansion or operation of the waste site. Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. <u>LLFA Comments on selected sites</u> Land South of Soar Brook, Burbage (LPR16 A): 117.38 ha Site is bounded to the north, west and east by ordinary watercourses and associated Flood Zones 2 and 3. These two key blue-green corridors should be enhanced as part of the development proposals. There is a surface water flow path / smaller watercourse bisecting the site (passing by Hogue Hall). Opportunities to enhance this watercourse should be taken, which could include incorporating the surface water drainage strategy into any enhancements. Land North of Glenfield, Groby (Parcel A) (LPR134 A): 10.64 ha Surface water flow path on the western boundary adjacent to the A46. This risk will need to be assessed further, especially if using the A46 as a point of access to the site. It will need to be demonstrated that there is safe access and egress into the site for all events up to and including the design flood event (1 in 100 year plus climate change). <u>Strategic Property Services on behalf of the Council as a Landowner</u> The major new employment development sites are again centred on the A5 corridor adjacent to and to the south of the M69 away from the proposed areas of residential growth potentially resulting in the need for further significant infrastructure investment throughout the wider area in addition to limiting the ability to access the sites by active and sustainable modes of transport.
8	Health Place Making
a	Policy REV02: Hot Food Takeaways and Fast-Food Outlets
	It is the position of Public Health that the policy wording is amended further to improve clarity and accuracy of the data indicators used. The addition of Part C will allow a 'catch-all' and build in flexibility later in the plan period if data changes. There are examples of this wording in several other adopted local plans. It is recommended that the policy wording is amended from:

	<i>'b) in and within a 400-metre radius of Barwell, Earl Shilton and Hinckley Castle wards which demonstrably have both higher obesity prevalence for certain age categories and higher concentrations of hot food takeaways than the Leicestershire average. '</i> To <i>'b) in and within a 400-metre radius of Barwell and Earl Shilton wards, which have a significantly higher prevalence of obesity in Year 6 compared to the Leicestershire average, and in and within a 400-metre radius of Hinckley Castle ward, which has a significantly higher density of hot food takeaways than the Leicestershire average.</i> <i>C) in any other areas of public health concern'</i> It is also noted that the Policy no longer includes text which refers to proposals for <i>new betting offices only being supported where they are located within a Town, District or Local Centre and do not result in an over proliferation of this use</i>. It is considered that this policy wording should be retained and included in Policy REV02, or another relevant policy. The inclusion of the policy is supported from a Neighbourhood Planning perspective, as this will provide Neighbourhood Plan groups with strategic context for any policies they wish to include, aimed tackling issues in their area and more specific locations.
9	Leisure and Tourism
a	Policy NEW05: Open Space Provision
	Given that the LTA's LTP4 CD Core Themes and Policies embrace health and environmental considerations, it welcomes this policy in principle. Whether on or off-site open space provision is made routes to those spaces for cycling, wheeling walking should be direct, safe and accessible for all likely users. In this regard there is a concern at the use of straight line (crow fly) access distances; for example, whilst an area of green space might be 480m away as the crow flies, where is that measured from within a development and what if there are buildings or other obstacles in the way of that straight line? It is suggested that the methodology/approach needs further refinement in this regard. Additionally, it is suggested that the proposed policy should be amended to include that routes to open spaces for cycling, wheeling walking should be direct, safe and accessible for all likely users. Further it should also specifically reference that in some cases off-site provision might require existing cycling, wheeling and walking routes to be upgraded to a safe and appropriate standard. For example, even if a Local Equipment Area for Play falls within the specified straight line access distance of 400m, children and their parents are likely to be discouraged from using it if to do so would require a walk along a road with no footway. The Policy should have regard to Policy M11 of the LMWLP. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral will be protected from permanent sterilisation by other development. Any forthcoming planning applications for

	non-mineral development within a Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. The development of a site for open space in a mineral safe guarding area could sterilise the mineral resource beneath or adjacent to the site and would therefore be contrary to Policy M11 of the LMWLP without a Mineral Assessment. This should therefore form a consideration in the assessment of suitable sites.
b	Policy NEW06: Sport and Recreation Facilities: Outdoor and Indoor Provision
	Outdoor sport and recreation facilities provision also needs to have regard to Policy M11 of the LMWLP. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within a Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. The development of a site for recreation provision in a mineral safeguarding area could sterilise the mineral resource beneath or adjacent to the site and would therefore be contrary to Policy M11 of the LMWLP without a Mineral Assessment. This should therefore form a consideration in the assessment of suitable sites.

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