

Comments from Leicestershire County Council

<i>Any overarching comments</i>	See separate text in Leicestershire County Council's Cabinet Report (8th September 2026) which provides the LTA's substantive comments. From an education perspective, LCC are satisfied that the Proposed Submission Draft Local Plan (Regulation 19) adequately reflects current educational requirements and accommodates potential future variations in school organisation. This is largely captured in the Infrastructure Delivery Plan Part 2 Infrastructure Schedule (IDP), which provides detail on the delivery of suitable education infrastructure in North West Leicestershire as new development comes forward. Reference to the ability to redefine and reconsider plans for education solutions from development in the IDP is fundamental as factors such as pupil numbers enrolled at existing schools, build costs and timeframes for preferred delivery are fluid and can alter based on many external factors. We actively encourage continued engagement with the Planning Team at North West Leicestershire District Council to ensure the delivery of the right number of school places in the right place, at the right time and to secure sufficient funding and resources to this. Also, it is understood that the following point is supported by colleagues in LCC's Planning Team regarding Policy Ec3g: Land south of EM Airport (EMP90), Policy H3a: New settlement Isley Woodhouse (IW1), Policy IF1: Development and Infrastructure, Policy IF2: Community Facilities. School Organisation are in agreement that education provision in Policy IF1 should appear as a free-standing infrastructure item given the essential role of education in new and existing communities and the differing nature of education provision in comparison with other forms of community facilities". There is very limited reference made to climate risk or climate adaptation throughout the plan, but our changing climate will greatly influence residents' lives, homes and jobs as well as the places used for leisure and amenity within the plan period. It is strongly recommended that climate adaptation be a theme that runs throughout the plan as a golden thread to ensure that development within the District is suitable for our new and changing climate. Development should not add to the future adaptation burden or contribute to maladaptation. Public Health supports policies seeking to improve health and wellbeing and reduce health inequalities in North West Leicestershire. It particularly supports Policy AP6 – Health Impact Assessments and Policy TC2 - Hot Food Takeaway Uses and Fast-Food Outlets. There is no reference or section for Neighbourhood Plans within the introductory paragraphs. <u>Comments from LCC as a Landowner</u>
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The Plan Objectives are largely supported with Objective 2 which ensures the delivery of new homes, Objective 3 which seeks to achieve sustainable high quality development, Objective 5 which supports employment and the district's economy and Objective 11 facilitating the maintenance of social and physical are seen as key in delivering the Plan Vision.

Policy S1 – Future Development Needs - The plan provides some detailed background as to the determination of the housing needs figure but then fails to give a precise breakdown of how the figure of 690 homes was arrived at notwithstanding that it is supported by the HENA and Statement of Common Ground. The general needs employment figure appears evidence based having been recently reviewed as part of North West Leicestershire Economic Needs 2026 Update and is therefore supported.

Policy S2 at para 1 provides a logical rationale for the distribution of housing across the District; the Settlement Hierarchy reflecting the level of services available to support the greater Coalville urban area and other individual communities. The relevance of potential reclassification of settlements set out in paras 3 and 4 is questioned as it provides unnecessary uncertainty given the requirement for the plan and therefore the settlement hierarchy to be reviewed at regular intervals.

Policy S4 – Countryside is supported. Whilst providing control over inappropriate uses of land in the countryside it provides scope for the development and maintenance of rural enterprises, the re-use of uneconomic buildings and the opportunity to bring forward housing to meet the needs of rural communities necessary to secure a vibrant countryside and thriving rural economy.

Policy S5 is seen as complimenting Policy S4 in relation to residential development in the countryside.

Housing Supply – In the period 2024-2042 the plan makes provision for the delivery of the basic need figure of 12420 dwellings (690 dpa) inclusive of the agreed contribution towards Leicester City's unmet need and a 10% buffer applied to undelivered portion of the basic housing requirement amounting to 1094 dwellings giving a total of 13,514 dwellings. It is considered that the 10% buffer should have been applied to the overall basic requirement figure thereby raising the total requirement to 13662 dwellings. However, the Local Plan Expert Group recommends that a range of 10 – 20% is appropriate and accordingly it is considered that, given the potential for larger strategic sites to be delayed and fail to deliver projected housing numbers, the buffer be increased to a minimum of 15% to provide the plan with additional resilience in the event of development not coming forward in line with current projections giving a total figure that would appear to align with the total future supply shown in Table 2 assuming the small windfall allowance is delivered in full. Further by increasing the buffer further the potential exists to facilitate the delivery of increased levels of affordable housing necessary to reduce the shortfall in meeting the currently assessed annual need of 382 affordable homes.

Policy H3 – Housing Allocations - The details of the proposed housing allocations are noted with site Policy ref 3Hz Land off Beesley Lane, Ravenstone strongly supported. The site which is in the sole ownership of the County Council is considered to be suitable, available and deliverable. This has been confirmed by the ongoing due diligence work that has been undertaken to date in relation to the matters detailed in Policy H3z. Whilst the site is being promoted by the County Council rather than a housebuilder it is the County Council's normal practice to bring sites to the market immediately on the grant of an outline

planning permission in much the same manner as a private sector land promoter. This model has a successful track record having previously brought forward the initial Beesley Lane development, as well as elsewhere across the county.

Policy H4 – Housing Types and Mix – The rationale of following the latest evidence provided by the HENA Leicester and Leicestershire Housing Mix Update Paper is supported. However, in circumstances where the housing mix or tenure split impacts viability and potentially constrains delivery the level, subject to it being supported by a robust viability appraisal, provision should be made to amend these requirement as necessary.

Policy H5 – Affordable Housing - The need for affordable housing in order to provide balanced communities is well accepted and the approach adopted in the plan to require higher levels of provision in areas of least affordability is supported. However, as the levels proposed will only deliver a relatively small proportion of the 382 affordable homes required annually to meet the current needs of the Borough consideration could be given to increasing overall housing numbers to assist in meeting this shortfall. Further the approach is welcomed whereby in circumstances where the level of affordable housing or tenure split impacts viability and potentially constrains delivery the level, subject to it being supported by a robust viability appraisal, can be reduced or the tenure split amended.

Policy H6 relating to the development of Rural Exception Sites is supported.

Policy H7 – Self Build and Custom Housebuilding - The policy provides that residential developments of 30 dwellings or more must provide at least 5% of dwellings as serviced plots for self-build and custom housebuilding, as part of an appropriate housing mix which is generally accepted practice although the requirement is only usually applied to sites of 100 plus homes in order not to overly constrain full site delivery. However, the ability for this requirement to be reduced where it is robustly demonstrated that the provision impacts viability or that serviced plots have been actively marketed for a minimum period of 12 months with no reasonable interest as detailed at H7.2 are seen as essential.

Policy Ec1 – Economic Strategy – The overall economic strategy is supported noting the objective of adding to the stock of start up premises (an area of perceived market failure) which is welcomed as is with the objective of supporting rural enterprise.

Policy Ec3 – Employment Allocations - The details of the proposed employment allocations are noted with site Policy ref Ec3c Land oat Burton Road, Oakthorpe strongly supported. The site which is in the sole ownership of the County Council is considered to be suitable, available and deliverable. This has been confirmed by the ongoing due diligence work that has been undertaken to date in relation to the matters detailed in Policy. The site is being promoted by the County Council with a view to it being brought to the market or developed in part or wholly as starter units and grow-on space. This model has a successful track record having previously brought forward sites in Coalville, as well as elsewhere across the county.

Policy Ec5 – Existing Employment Areas – Whilst the basic policy is largely supported it omits provisions supporting the redevelopment or upgrading of existing sites for employment uses at the end of their economic life which is important in encouraging long term investment and securing economic growth.

	Policy Ec6 – Start-up Workspace – The policy is seen as addressing an area of economic market failure and is supported noting that any requirement relating to the delivery of start-up units may be reduced on viability grounds subject to being supported by a robust appraisal. Policy En2 – River Mease Special Area of Conservation – It is noted that the upgrading of the Packington and Measham STWs is due for completion in April 2027 removing a potential constraint to development which is welcomed.
Section	Specific comments (please include paragraph numbers/page numbers where relevant)
Chapter 1: Introduction	It is considered that the introduction provides a poor representation of Neighbourhood Plans and undermines strength that they have within the planning system and sends out the wrong message to developers. Suggest having similar, more positive, wording in an expanded, stand alone, paragraph. The overall tone of the document perhaps leans more towards the development industry, rather than the public sector supporting communities to shape development of the area for its real future needs and requirements based on their expertise, evidence and knowledge. Paragraph 1.2 second bullet needs changing to <i>‘The Minerals and Waste Local Plan, prepared by Leicestershire County Council or any successor document prepared by any successor authority’</i>.
Chapter 2: Background to the Local Plan	Paragraph 2.6.3 - Welcome the early reference as to how the Plan enables the delivery of the Strategic Growth Plan.
Chapter 3: Strategy	Welcome Objective 10 but suggest some rewording/strengthening: ‘10. Ensure the efficient use of natural resources brownfield land, in particular brownfield land, control pollution and facilitate the sustainable use and management of minerals and the prevention and minimisation of waste. <i>[Ensuring the efficient use of natural resources]</i>. There is no mention of Neighbourhood Plans - as a minimum would expect to have something mentioned under S3 and S5.
Policy S1 – Future Housing and Economic Development Needs	
Policy S2 – The Development Strategy and Settlement Hierarchy	Consider strengthening references to community cohesion, social connectedness and integration between existing and new communities, particularly in major growth locations. Welcome the emphasis on building strong communities and creating places that support residents' health and wellbeing.

Policy S3 – Local Housing Needs Villages	Strong recognition of health, wellbeing, community facilities and supporting infrastructure
Policy S4 – Countryside	There is an opportunity to mention Minerals & Waste development in line with LMWLP or successor policies may be appropriate and also regard to M&W Safeguarding here, where appropriate
Policy S5 – Residential Development in the Countryside	There is an opportunity to mention Minerals & Waste Safeguarding here, where appropriate
Chapter 4: Creating Attractive Places	There is no mention of Neighbourhood Plans and how these are supported and recognised within these policies.
Policy AP1 – Design of New Development	It would be appropriate to include an additional requirement here relating to developments' climate resilience. For example, developers could be asked to demonstrate that buildings do not overheat by providing the results of a CIBSE TM59 assessment. Overheating should be prevented through good design and a fabric first approach (e.g. external awnings and blinds to south facing glazing) rather than air conditioning. However, air conditioning could be considered for buildings likely to be used by vulnerable such as residential care homes and schools. It would also be appropriate to stipulate the inclusion of building scale mitigations to prevent or alleviate flooding such as one way valves on waste water pipes. Development in Ashby should demonstrate historic market town character identified within Neighbourhood Plan Policy G2.
Policy AP2 - Amenity	There is perhaps a missed opportunity here to link into the 'agent of change' principles. Minerals and waste safeguarding are important considerations on this issue. Extant minerals and waste operations and infrastructure should not be prejudiced by non-waste and non-mineral development in proximity.
Policy AP3 – Renewable Energy	The County Council welcomes Policy AP3 and supports the positive approach towards renewable energy generation and the establishment of locally derived renewable energy targets. It is recommended that the Council considers making use of the Leicester and Leicestershire Local Area Energy Plan (LAEP) Lens to inform the evidence base supporting the renewable energy targets within Policy AP3. The LAEP Lens provides an interactive platform through which users can explore local energy opportunities, priority projects, recommended interventions and potential deployment areas. It can also help identify the scale of renewable energy opportunities and associated infrastructure requirements Freely accessible here: https://greenerfutureleicestershire.co.uk/leicestershire-laep The County Council also recommends that greater recognition is given to the role of community energy schemes within the supporting text and policy. Community energy delivers local environmental, social and economic benefits and contributes to a more resilient local energy network.

Policy AP4 – Reducing Carbon Emissions	We welcome the policy and paragraph 4.5.13’s recognition that the construction process uses a significant amount of resources and can result in a lot of waste. We welcome the requirement for large scale development to reduce lifecycle carbon emissions and maximise opportunities for the reuse of materials. The County Council supports Policy AP4 and welcomes the positive approach towards reducing operational and embodied carbon emissions through the energy hierarchy, renewable energy generation and whole life carbon considerations. Consideration should be given to strengthening the policy by Introducing clearer targets and standards, identifying specific standards and performance benchmarks when appropriate makes the criteria more measurable and easier to assess compliance. The Council also queries whether criterion 1(b) is necessary, as achieving the latest national energy efficiency standards is already a legal requirement through the Building Regulations regime.
Policy AP5 – Health and Wellbeing	Consider recognising allotments and community growing spaces as part of the wider green infrastructure network due to their contribution to biodiversity, wellbeing and community cohesion.
Policy AP6 – Health Impact Assessments	Public Health and district colleagues have worked closely on the policy requirement of Health Impact Assessments alongside applications for some development. Public Health support this policy and the specific requirement for developers to use the LCC HIA template.
Policy AP7 - Flood Risk	Paragraph 4.8.4 - <i>“The district lies wholly within the catchment of the River Trent and as such the primary source of flood risk in the district is from fluvial flooding.”</i> This is a broad generalisation, and the second part of this sentence cannot be concluded from the first part. Please consider removing the second part of this sentence which claims the primary source of flood risk is fluvial. Paragraph 4.8.8 - <i>“Leicestershire County Council are the Local Lead Flood Authority (LLFA) who are aware of the associated risks of mine water rising, specifically within Oakthorpe and Donisthorpe although have not received any reports of associated flooding.”</i> Whilst the LLFA is aware of the general risks of mine water rising, there are no specific LLFA active mine water monitoring activities in Oakthorpe and Donisthorpe. Please consider re-wording this as it may be interpreted that the LLFA is monitoring or is particularly concerned with the risk of mine water rising in Oakthorpe and Donisthorpe. Mine water monitoring may be undertaken by the Mining Remediation Authority (formerly the Coal Authority – note several references to their former name in the draft Local Plan too). Paragraph 4.8.10 – The statement <i>“Qbar is the peak rate of surface water runoff from rural catchment, measured in litres per second”</i> is technically incorrect. Qbar is the <u>average annual</u> peak runoff rate of surface water from a <u>greenfield</u> catchment. Please can you correct.

	Paragraph 4.8.12 - <i>“If development is unable to meet the discharge volumes to the Qbar greenfield rate minus 20% this would need to be clearly demonstrated. The LLFA would need assurance that the runoff volume would be discharged at a rate that does not adversely affect flood risk.”</i> Please consider amending ‘meet the discharge volumes’ to ‘limit discharge’. Total discharge <u>volumes</u> are regulated by separate standards to peak discharge <u>rates</u> so there is potential for some misinterpretation or confusion here. Policy AP7 – Flood Risk - <i>Wherever possible development should take place within Flood Zone 1, the area of land deemed at least risk of flooding. In terms of Flood risk, applications should be consistent with the requirements of the National Planning Policy Framework and Planning Practice Guidance, or their successor.</i> The statement <i>“Flood Zone 1, the area of land deemed at least risk of flooding...”</i> relates to flooding from rivers and seas only. The September 2023 update of NPPF amended the wording around the sequential test to <i>“...steer new development to areas with the lowest risk of flooding from <u>any source</u>.”</i> (Currently Paragraph 174). The change of wording ensures all sources of flood risk, including surface water flood risk, are considered as part of the sequential test, not just the risk of flooding from rivers and seas (i.e. Flood Zones 1, 2 and 3). Please consider ensuring this is reflected in the wording of Policy AP7. The LLFA has recently reviewed policy around easements adjacent to ordinary watercourses and ditches. Following incidents across the County of significant encroachment of development on the channel of ordinary watercourses, the LLFA would request consideration of the following additional policy statement within Policy AP7 (or alternative Policy IF3 Green and Blue Infrastructure): <i>“For proposed development close to an ordinary watercourse, an easement of 4.5m is required (or a 3m easement if the channel width is less than 2m) to be kept from the top of the bank. This is necessary to ensure that an appropriate buffer is provided to enable access for maintenance and during a flood event, and to make space for water as well as protect and enhance wildlife habitat adjacent to watercourses.”</i> For policy context and justification, the Environment Agency has a policy backed up by legislation (The Environmental Permitting Regulations) that mandates consultation on any activity / development within 8 metres of the top of the bank of a main river, but no such policy exists for ordinary watercourses (smaller watercourses and ditches) which are regulated by the LLFA. It is therefore necessary to introduce policy which strengthens the District’s position in relation to the protection of critical blue-green corridors. The peak rate of run-off policy is welcomed. However, the policy is lacking mention of water attenuation in times of heavy rainfall which climate change will exacerbate. Developers should confirm where excess run-off will be held or routed to in the instance that the design event is exceeded. Lastly, developers should be encouraged to plan drainage design on a catchment wide basis and not solely on a site basis.
Policy AP8 – Sustainable Drainage Systems	The policy could be strengthened through explicit reference to the drainage hierarchy to ensure surface water is managed in the most sustainable manner possible, giving preference to nature based/green SuDS with benefits for people and nature. Paragraph 4.9.6 - Typo – Replace ‘maintained’ with ‘maintenance’.

	Policy AP8 - Numbering jumps from 1 to 4 with no 2 or 3. Paragraph 1 defines the acronym SuDS but then Paragraph 4 uses the full term ‘Sustainable Drainage Systems’ again.
Policy AP9 – Water Efficiency	The policy could place greater emphasis on water reuse, rainwater harvesting and greywater recycling systems, particularly for major developments. E.g. "Major developments should maximise opportunities for rainwater harvesting, greywater recycling and water reuse measures where feasible." Consider cross-referencing Policies AP7 and AP8 to promote integrated water management and climate resilience. Consider employing a more stringent water consumption target such as 95 litres/person/day.
Chapter 5: Housing	See separate text in Leicestershire County Council’s Cabinet Report (8th September 2026) which provides the LTA’s substantive comments in respect of the Enabling Travel Choice Strategy. Welcome inclusion of Made Neighbourhood Plans in text on sustainable villages. Would be helpful to see added text ‘will be used to determine planning applications in these Neighbourhood Plan areas and any subsequent additional Neighbourhood Plans Made within the lifetime of this Local Plan.’ Consider strengthening the policy by encouraging resident and community involvement in the future management of community assets and public spaces where appropriate.
Policy H2 – Housing Commitments	Paragraph 5.3.3 - Welcome the inclusion and recognition of Neighbourhood Plan housing allocations.
Policy H3 - Housing Allocations	5.4.3 & 5.4.4 (paragraph number wrong) - Welcome the inclusion and recognition of Neighbourhood Plan potential housing allocations.
<i>Policy H3a – New Settlement, Isley Woodhouse (IW1)</i>	In the interests of completeness and of consistency (with Policy H3L, 2e), 5e requires a proposed Main Modification to include reference to the local road network as well. This strategic development site is located within the catchment of the Diseworth Brook, which is a tributary of the Long Whatton Brook. Both have an extensive history of flooding which have resulted in internal property flooding. Where development is proposed in areas at risk of flooding, following application of the Sequential Test, the Exception Test should be applied. Paragraph 178 of the NPPF states that development “...where possible, will reduce flood risk overall.” Taking into consideration the scale of the development, the LLFA will expect to see measures such as those outlined within planning

practice guidance on flood risk and coastal change (Paragraph 037), which detail how the flood mitigation measures go beyond just managing the flood risk resulting from the development. This could consider incorporating green infrastructure within the layout and form of development to make additional space for the flow and storage of flood water.

Please consider an additional requirement or amendment of point ii under Policy 3a (Part 2i) that states:

- *“Detail how the flood mitigation measures go beyond just managing the flood risk resulting from the development.”*

Given the scale of the proposed settlement, consideration should be given to the early delivery of community infrastructure, community development activity and opportunities for resident participation from the outset.

The site is not located in any Mineral Safeguarding Area and, as a consequence, a mineral assessment would not be required. However, the MPA wishes to bring to your attention the permitted current and future operations at Breedon and Cloud Hill quarries both of which are located close to the south west boundary of the proposed allocation. Breedon Quarry currently operates under the terms of planning permission 2003/0701/07. At its closest point, the planning permission boundary would be less than 400 metres from the land the subject of this allocation. Planning permission 2003/0701/07 has also recently been subject to two applications - an Environment Act 1995 Review of Mineral Permission to update environmental controls as well as a Section 73 application to extend the lifetime of the quarry from 2042 until 2078. Following a meeting of the Council's Development Control and Regulatory Board (DCRB) in July 2022, there is now a resolution to approve both applications subject to a S106 legal agreement. Whilst work on the S106 is still progressing, it is anticipated that this process will be resolved during 2026, following which the new permissions will be issued.

Cloud Hill Quarry's active permission related to mineral extraction is now 2025/VOCM/0113/LCC which supersedes the 1996 permission mentioned in our previous response.

Mineral operations of the type undertaken at Breedon and Cloud Hill quarries can give rise to impacts associated with – amongst other things – landscape and visual impacts, noise, dust and blast vibration, light pollution, extended hours of operation, HGV movements and hydrological issues associated with dewatering. The MWPA has concerns that the proposed development would impact on the ability of the existing and permitted mineral operations to continue to operate without being compromised. In this respect, it is considered that if brought forward, any masterplan or subsequent application(s) should have regard to Breedon and Cloud Hill quarries as part of any baseline assessment. The MWPA further considers that the proposed new settlement should be designed in such a way as to ensure that it would not prejudice the continued operation of the quarries in this location or that there would be impacts to amenity arising from inappropriate design and layout. It is suggested that paragraph 3(f) of the supporting text could be amended to also make reference to ongoing mineral extraction operations associated with Breedon and Cloud Hill quarries. This approach is supported by policy M12: Safeguarding of Existing Mineral Sites and Associated Minerals Infrastructure of the adopted Leicestershire Minerals and Waste Local Plan 2019-2031 (LMWLP) which forms part of the development plan for the area.

	We welcome criterion (p) of the policy. This will help to protect existing mineral sites, as it seems to reflect ‘agent of change’ principles. There are no safeguarded waste sites in the immediate vicinity of the proposed allocation, however, noting the scale of the proposed new settlement, the MWPA would strongly recommend that paragraph 3(b) of the supporting text be amended to make reference to the need to identify appropriate infrastructure to support the waste management needs of the new settlement and any impacts it is likely to have on existing waste management infrastructure within the County.
<i>Policy H3b - Land off Thornborough Road, Coalville (C18)</i>	Paragraph 5.6.4 - Welcome the recognition of Hugglescote and Donington le Heath Neighbourhood Plan. Could be stronger wording with site examples similar to wording in paragraph 5.15.1 As previously advised, this allocation is in a MSA for coal. We recommend that that a Minerals Assessment is undertaken in line with Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) to support any allocation of these sites in new policy, ensuring that the mineral is not needlessly sterilised by future development. It should also be noted that the allocation is under 1km from Coalville Transfer Station (N29) and Coalville RHWS (N6), which are both safeguarded waste sites. Any allocation should be in line with LMWLP Policy W9 and not prejudice the operation of the site. Any future planning permission would need to be in line with the ‘agent of change’ principle from NPPF.
<i>Policy H3c – Coalville Urban Area Strategic Development Area</i>	In the interest of clarity, this policy requires a proposed Main Modification to make clear that it will be permissible for transport routes to cross the ‘Area of Separation’ where that is required to ensure safe and effective access to the CUASDA and likewise connectivity within it.
<i>Policy H3d - West of Whitwick</i>	We welcome the criterion (j) within the policy which requires the provision of a Mineral Assessment.
<i>Policy H3e - Land at Lily Bank, Thringstone (C74)</i>	
<i>Policy H3f - Land south of The Green, Donington le Heath (C90)</i>	Paragraph 5.11.1 - Would be useful to have additional text ‘will be used to determine planning applications in the Neighbourhood Plan area.’ (similar to that paragraph 5.15.1). The allocation is not within an MSA. There are MSAs more distant over Richmond Road. There are safeguarded waste sites under 900m away (South Ind Est, Ellistown which is Russell’s Auto Salvage, N21) and under 1km away (Direct Car Spares, N22) respectively. This should be something to be aware of, as any allocation should be in line with LMWLP Policy W9 and not prejudice the operation of the site. Any future planning permission would need to be in line with the ‘agent of change’ principle from NPPF, requiring the applicant to provide mitigation before the development has been completed where a sensitive use is introduced.

<i>Policy H3g - Former Hermitage Leisure Centre, Silver Street, Whitwick (C92)</i>	
<i>Policy H3h - Land at Wash Lane and Coalville Lane (R17)</i>	Criterion (c) seems to be missing.
<i>Policy H3i - Money Hill, Ashby de la Zouch (A5)</i>	Paragraph 5.15.1 - Welcome the recognition of Ashby de la Zouch Neighbourhood Plan and inclusion of the statement that it will be used to determine planning applications for this site. The Neighbourhood Plan acknowledges the needs for growth but also identifies community concerns in the provision of services for the proposed growth. Policy could be reworded to ensure that service provision for transport, health etc is phased throughout the term of the development to avoid pressures on existing services. We welcome criterion (h) on provision of a Mineral Assessment for at or near surface coal. Paragraph 5.20.5, line 1 – Text should be amended to read, “<i>The planning application and comprehensive masterplan should be informed by consideration of the impact of the proposals upon heritage assets, including the following designated assets in the vicinity:</i>” ...
<i>Policy H3j - Land off Rushey Close, Ashby de la Zouch (A27)</i>	Paragraph 5.17.1 – There should be mention of the Ashby de la Zouch and Blackfordby Neighbourhood Plans.
<i>Policy H3k - Land adjacent to 194 Burton Road, Ashby de la Zouch (A31)</i>	We welcome the inclusion of the need to carry out a Minerals Assessment. As previously advised, Anwell Place STW (N2) is under 1km away. This should be something to be aware of, as any allocation should be in line with LMWLP Policy W9 and not prejudice the operation of the site. Any future planning permission would need to be in line with the ‘agent of change’ principle from NPPF, requiring the applicant to provide mitigation before the development has been completed where a sensitive use is introduced.
<i>Policy H3l - West of Castle Donington</i>	As previously advised, the MPA notes that, with the exception of a small (approximately 50m) strip of land just inside its northernmost boundary, which falls within the Mineral Safeguarding Area for sand and gravel as set out in the LMWLP, the majority of the land to the north and south of Park Lane is not located within a Mineral Safeguarding Area. Dependent on the proposed phasing, there may be the potential to utilise the sand and gravel in this area as part of the construction process. Whilst it is noted that drawing no CD10: Parameters Plan indicates that the land falling within the safeguarding area would be designed as open space, which in itself would not directly sterilise the mineral resource, the effect of built development taking place immediately south of this, would prevent future access to the mineral reserve. A mineral assessment should be required for any application on land located to the north of Park Lane.

	The MPA is also aware that there is consented mineral extraction associated with Shardlow Quarry (code ref: CM9/0811/53) located within 500m of the proposed site allocation north of the River Trent, within Derbyshire. Dependant on the remaining working life of the quarry and the likely timescales for this site to come forward, there may be the potential for impacts associated with mineral extraction in this location. You are advised to consult Derbyshire County Council, the relevant MPA in respect of the Shardlow Quarry site, at the earliest opportunity for further information. There are no safeguarded waste sites close to the site, and it is not considered that the proposed allocation would affect the waste safeguarding interest. As previously advised, consideration should be given to the cumulation of effects upon the capacity of existing waste management infrastructure.
<i>Policy H3m - Land off Leicester Road, Ibstock (Ib18)</i>	Paragraph 5.23.1 - Welcome highlighting that part of the site would fall within the Hugglescote and Donington le Heath Neighbourhood Plan area. Would be helpful to see added text 'will be used to determine planning applications in the Neighbourhood Plan area.' We welcome criterion (h) on a Mineral Safeguarding Area for Brick Clay, Coal and Sand & Gravel. Our previous comments stated that a Coal Mining Risk Assessment is also required. As Ibstock brickworks is located close to the site, development will have to consider impact on the operations of the brickworks (agent of change and minerals safeguarding principles).
<i>Policy H3n - Land rear of 111a High Street, Ibstock</i>	We welcome the inclusion of the need to carry out a Minerals Assessment.
<i>Policy H3o - Land south of Ashby Road, Kegworth (K12)</i>	Safeguarded waste sites are at Citrus Grove (N30) and Kegworth STW (N10 east). These are around 1km to the North. Agent of change principles may be necessary to prevent amenity issues on the introduction of a sensitive use.
<i>Policy H3p - Land off Leicester Road/Ashby Road, Measham (M11)</i>	We welcome criterion (f) on the provision of a Mineral Assessment.
<i>Policy H3q - Land off Abney Drive, Measham (M14)</i>	We welcome the inclusion of the need to carry out a Minerals Assessment.
<i>Policy H3r - Land off Steeple View Lane, Appleby Magna (Ap1)</i>	
<i>Policy H3s - Midland Road, Ellistown (E7)</i>	Paragraph 5.32.1 - Text should read "Land at Midland Road is located within the National Forest (Policy En3) and the Ellistown and Battleflat Neighbourhood Plan Area.

<i>Policy H3t - Land off Gadsby Road, Heather (H3)</i>	We welcome the criterion for the provision of a Mineral Assessment.
<i>Policy H3u - Ashby Road, Moira (Mo8)</i>	We welcome the inclusion of the need to carry out a Minerals Assessment, however this may be above and beyond requirements. Our previous comments indicated that as the proposed development is located with residential development sitting to either side as such the County Council has no objections to the proposed land use of 49 residential properties.
<i>Policy H3v – Land off Redfern Road, Oakthorpe (Oa5)</i>	We welcome the inclusion of the need to carry out a Minerals Assessment, however this may be above and beyond requirements. Our previous comments indicated that <i>‘as the proposal sits adjacent to residential development currently under construction and would seek to effectively link the residential development to existing. Due to the nature of the mineral and the proximity of nearby residential development County Council has no objections to the proposed land use for around 47 homes’</i> .
<i>Policy H3w – Land off Century Drive, Packington (P4)</i>	We welcome the inclusion of the need to carry out a Minerals Assessment, however our original comments indicated that the MSA was for coal and sand & gravel.
<i>Policy H3x - Land west of Redburrow Lane, Packington (P7)</i>	We welcome the inclusion of the need to carry out a Minerals Assessment.
<i>Policy H3y - Land off Church Lane, Ravenstone (R9)</i>	Policy H3y point 2(c) – Text should be amended as follows – “<i>A layout which, as far as possible, avoids or minimises harm to the Ravenstone Conservation Area and other designated heritage assets</i>” Policy H3y point 2(e) - We welcome the inclusion of the need to carry out a Minerals Assessment. The site is around 940m from the safeguarded waste site Snibston Drive, Coalville (N20). It is over 1km from Ravenstone STW (N17). This should be something to be aware of, as any allocation should be in line with LMWLP Policy W9 and not prejudice the operation of the sites. Any future planning permission would need to be in line with the ‘agent of change’ principle from NPPF, requiring the applicant to provide mitigation before the development has been completed where a sensitive use is introduced.
<i>Policy H3z - Land off Beesley Lane, Ravenstone (R12)</i>	We welcome the inclusion of the need to carry out a Minerals Assessment. Coal and sand & gravel are referred to however it is useful not to necessarily specify the mineral as the Mineral Assessment will look for viable deposits of any mineral.
Policy H4 – Housing Types and Mix (Strategic Policy)	Reference should be made to the Housing Needs Assessment and affording housing policies within the Ashby Neighbourhood Plan and recent evidence within.
Policy H5 – Affordable Housing (Strategic Policy)	Consider text to encourage developers to engage with local communities and relevant service providers when determining the mix and type of affordable housing to ensure provision reflects identified local needs and supports sustainable communities.

Policy H6 – Rural Exceptions Sites	
Policy H7 – Self-build and Custom Housebuilding	There is no reference to Neighbourhood Plans and is unclear whether NWLDC will be encouraging/expecting to see provision in favour of self-builds within Neighbourhood Plans. As these are usually single dwellings, a Neighbourhood Plan would be a better place to encourage policy.
Policy H8 – Houses in Multiple Occupation in Kegworth	Paragraph 5.161 - Welcome text to maintain a proportionate mix of housing types and occupation. Paragraph 5.45.12 - Suggest altering the word 'refuse' to 'waste and recycling' to capture all waste streams.
Policy H9 – Provision for Gypsies & Travellers and Travelling Showpeople	The approach of delivering Gypsy and Traveller accommodation through strategic housing allocations is supported. The availability of rented pitches provided by Travellers themselves is becoming increasingly limited. In addition, a number of existing private sites that previously offered rented pitches have converted, or are at risk of converting, into ordinary mobile home parks. Requiring provision through strategic housing allocations helps ensure that new pitches are delivered, retained, and made available for use by Gypsy and Traveller families. Paragraph 5.46.8 usefully reinforces this approach by protecting existing sites and preventing their redevelopment for other uses unless it is clearly demonstrated that the current use is no longer required. Ideally, Gypsy and Traveller pitches delivered through strategic housing allocations should be provided and managed as socially rented accommodation, either by the local authority or by a registered social landlord. This would help ensure that Traveller families who are unable to provide their own site can access suitable rented accommodation. It would also help maintain the overall number of available pitches and ensure that they remain in active use. There should be clear monitoring of the delivery of Gypsy and Traveller pitches and Travelling Showpeople plots, including those provided through strategic housing allocations, to ensure that they are delivered within agreed timescales. Delivery should be spread across the plan period and not left until the later stages, with clear milestones set for developers. Policy S4 is supported in relation to development in the countryside, particularly where it allows for appropriate Gypsy and Traveller sites and Travelling Showpeople sites in suitable countryside locations. In relation to transit provision, the supporting text should acknowledge the role of the County Wide Traveller Working Party in considering transit accommodation needs across Leicester and Leicestershire and supporting a coordinated cross-boundary approach. Given the acknowledged unauthorised encampment issues across the wider area, greater clarity on the intended timescale for identifying and delivering transit provision would be beneficial. From a minerals perspective, the same principles for site allocation for housing sites apply, and therefore a further criterion should be added on the need to avoid the sterilisation of mineral in line with LMWLP Policy M11 and also another on the need to not introduce sensitive uses adjacent to operational safeguarded waste sites in line with LMWLP Policy W9. Whilst it is noted that

	criteria (f) and (g) notably cover amenity and neighbouring uses, they perhaps do not fully cover the ‘agent of change’ principle in NPPF.
Policy H10 – Space Standards	
Policy H11 – Accessible, Adaptable and Wheelchair User Homes	
Chapter 6: The Economy	See separate text in Leicestershire County Council’s Cabinet Report (8th September 2026) which provides the LTA’s substantive comments in respect of the Enabling Travel Choice Strategy. Paragraph 6.7.11 (and more widely 6.7.8 to 6.7.10) - The sentiment of the paragraph is supported but as just supporting text it is unlikely to carry much weight as a planning consideration. In the interests of effectiveness, the Plan requires a proposed Main Modification to incorporate this paragraph into a policy. It is noted that there is no mention of Neighbourhood Plans.
Policy Ec1 – Economic Strategy	
Policy Ec2 – Employment Commitments	
Policy Ec3 – Employment Allocations	
<i>Policy Ec3x - Land west of Regs Way Coalville (EMP34)</i>	
<i>Policy Ec3x - Land west of Hilltop Farm, Castle Donington (EMP89)</i>	
<i>Policy Ec3x - Land north of Derby Road, Kegworth (EMP73a)</i>	We welcome criterion (f) of the policy requiring a Mineral Assessment.

<i>Policy Ec3x – Ex Measham Mine site, Measham (EMP66)</i>	We welcome the inclusion of the need to carry out a Minerals Assessment.
<i>Policy Ec3x – Land at Burton Road, Oakthorpe (EMP60)</i>	Site is in an MSA for coal which was highlighted previously. There is no mention of the MSA in the policy or supporting text. We welcome the consideration of mine water issues.
<i>Policy Ec3x – Land between Ellistown Terrace Road and Wood Road, Ellistown (EMP98)</i>	We welcome the inclusion of the need to carry out a Minerals Assessment in line with Policy M11 of the LMWLP or its successor. This also needs to be in line with policy W9 of LMWLP (or its successor) as the allocation is within 600m of Ellistown Brickworks (N27) and Ellistown Concrete (N8) which are safeguarded waste sites. Any allocation should be in line with LMWLP Policy W9 and not prejudice the operation of the site. Any future planning permission would need to be in line with the ‘agent of change’ principle from NPPF, requiring the applicant to provide mitigation before the development has been completed where a sensitive use is introduced.
<i>Policy Ec3x – Land south of East Midlands Airport (EMP90)</i>	As drafted, Policy EMP90 stipulates no more than 20% of the total B2/B8 floorspace will be for manufacturing use. This policy should be reviewed to reflect the latest position of the Examination in Public for East Midlands Gateway Phase 2 and the proposed changes around advanced manufacturing (Freeport designation objective).
<i>Policy Ec3x – Land at Corkscrew Lane, Ashby de la Zouch (EMP80)</i>	
<i>Policy Ec3x – Land north of Remembrance Way, Kegworth (EMP73b)</i>	We welcome the inclusion of the need to carry out a Minerals Assessment in line with Policy M11 of the LMWLP or its successor.
<i>Policy Ec3x – Land south of Kegworth bypass (EMP97)</i>	
<i>Policy Ec3x – Land north of J11 A/M42 (EMP82)</i>	
<i>Policy Ec3x – Land northeast of J11 A/M42 (EMP83/84/94)</i>	
<i>Policy Ec4 – Employment Uses on Unidentified Sites</i>	There is an opportunity here to make sure that any proposals are in line with the LMWLP Policies W9 and M11 on Minerals and Waste safeguarding. Whilst we appreciate that appropriate location and amenity elements do help, the explicit mention of these

	policies may prevent unnecessary sterilisation of mineral or the introduction of sensitive uses which could prejudice the continued use and operation of the mineral or waste sites.
Policy Ec5 – Existing Employment Areas	
Policy Ec6 – Start-up Workspace	
Policy Ec7 – Local Employment Opportunities	Could include requirement for developers delivering social value outcomes, including the creation of local employment and skills opportunities. https://wmca.moderngov.co.uk/documents/s625/Appendix%204.pdf
Policy Ec8 - East Midlands Airport	
Policy Ec9 - East Midlands Airport: Safeguarding	We welcome the recognition that there can be interplay between wastewater, waste or mineral developments and the attractiveness to birds which would create a hazard.
Policy Ec10 - East Midlands Airport: Public Safety Zones	
Policy Ec11 – Donington Park Circuit	
Policy Ec12 - Tourist Attractions and Visitor Accommodation	
Chapter 7: Town and Local Centres	Reference could be made to Neighbourhood Plans (particularly Ashby de la Zouch).
Policy TC1 - Town and Local Centres: Hierarchy and Management of Development	

Policy TC2 - Hot Food Takeaway Uses and Fast-Food Outlets	Food and drink offered in shops, hot food takeaways, cafes and restaurants significantly shape dietary behaviours. A reduction in the diversity of the food offer can limit healthier options, and a concentration of hot food takeaways is associated with poorer dietary behaviours. Public Health support Policy TC2 in its restriction of hot food takeaways and fast-food outlets as well as high concentrations of those uses in unacceptable locations, in line with NPPF. The addition of clear definitions of locations where children and young people congregate and walking distances (and how these are measured) are welcomed. Inclusion of both primary and secondary schools and potential for mitigation of risks to health via planning conditions on opening hours also widen the potential to protect health in children and young people. The policy is seen to have potentially positive impacts on physical and mental health following a rapid health impact assessment from Public Health, particularly for children and young people. The policy could be strengthened through providing clear definitions of health and health inequalities, and including links to statutory documents such as the Leicestershire Joint Health and Wellbeing Strategy (2022-32) and the latest Health Inequalities JSNA data (currently 2023). This would also allow focused consideration on local areas of most risk to health inequalities from the latest JSNA data to be requested. More clarity could be provided around unacceptable concentrations of hot food takeaways.
Chapter 8: Infrastructure and Facilities	Reference could be made to Neighbourhood Plans.
Policy IF1 – Development and Infrastructure	See separate text in Leicestershire County Council’s Cabinet Report (8th September 2026) which provides the LTA’s substantive comments in respect of the Plan’s proposed funding mechanisms. Paragraph 8.2.1 - We welcome the recognition that waste infrastructure is important. We also welcome the acknowledgement that infrastructure required for development includes utilities, waste and recycling facilities. We further welcome the securing of provision for these important aspects of supporting infrastructure by the various means set out. Where future demand for waste services exceeds available capacity (which cannot be offset by claiming s106 contributions) and additional need is required to be assessed, we will consider undertaking an infrastructure assessment, including the viability of site expansion, additional and/or replacement sites, increasing container capacity and reviewing the operating model.
Policy IF2 – Community Facilities	
Policy IF3 - Green and Blue Infrastructure	Either within this policy or another suitable policy, LCC would like to see evidence of NWLDC’s policy position on the construction of new water storage such as reservoirs or smaller scale on farm water storage ponds. It is becoming increasingly clear that

	Leicestershire will be subject to drought and water scarcity more regularly and more water storage is therefore needed to service a growing population. Regarding green infrastructure, it would be beneficial for the supporting text to emphasise the importance of this in adapting to climate change by providing shade, alleviating the urban heat island effect and improving water infiltration. The policy should include a clause to ensure that new green infrastructure is properly looked after and maintained, including the replacement of failed planting with new. Any aftercare programme for planting should include watering during drying periods.
Policy IF4 – Open Space, Sport and Recreation Facilities	
Policy IF5 - Long-term Management of Community Assets and Stewardship	Inclusion of Parish and Town Councils having first refusal for the taking on the management and maintenance of Community Assets in particular play areas, is welcomed.
Policy IF6 – Transport Infrastructure and New Development	See separate text in Leicestershire County Council’s Cabinet Report (8th September 2026) which provides the LTA’s substantive comments in respect of the Enabling Travel Choice Strategy and about the Plan’s ‘transport strategy’. There would be some benefit to having an additional criteria and/or cross-reference(s) to relevant policies elsewhere in the draft Plan with respect to promoting sustainable travel as a key component in reducing carbon emissions. New development should maximise opportunities for sustainable travel and contribute to improvements to community connectivity, air quality and public health through the provision of high-quality walking, cycling and public transport infrastructure. Cycling infrastructure should be designed in accordance with the principles and standards set out in DfT Local Transport Note 1/20 (Cycle Infrastructure Design).
Policy IF7 – Reopening of Passenger Rail Services	
Policy IF8 – Ashby Canal	
Policy IF9 – Parking and New Development	

Chapter 9: Environment	
Policy En1 – Nature Conservation	There should be reference to the strengthened Biodiversity Duty that requires all public bodies including Local Authorities, to protect and enhance biodiversity and how this duty will be applied within the local plan. There is no mention on Neighbourhood Plans – most Neighbourhood Plans include policies around their requirements for Nature conservation, green spaces.
Policy En2 – River Mease Special Area of Conservation	
Policy En3 - The National Forest	See also comment on Policy AP1 (Development in Ashby should demonstrate historic market town character identified within Neighbourhood Plan Policy G2.)
Policy En4 - Charnwood Forest Regional Park	Paragraph 9.5.1 and 9.5.6 - Welcome acknowledgement that there is mineral working in some areas of the Charnwood Forest and that mineral workings are part of the traditional working landscape such as at Bardon Quarry and can provide biodiversity, geodiversity and recreation opportunities.
Policy En5 – Area of Separation	
Policy En6 – Land and Air Quality	
Policy En7 – Conservation and Enhancement of the Historic Environment	Paragraph 9.8.8 - Welcome the reference to Neighbourhood Plans in text around heritage assets and that non-designated heritage assets are identified by local communities. Paragraph 9.8.8, line 4 – ...Non-designated heritage assets (NDHA) far out-number designated assets and are comprehensively recorded on the Leicestershire & Rutland Historic Environment Record (HER). Additional non-designated assets have been identified by the Council on our local lists and are also recognised by local communities in Neighbourhood Plans. Paragraph 9.8.10, line 4 - In addition to maintaining the HER, Leicestershire County Council provide the NWLDC with archaeological planning advice and can provide guidance to developers and land use managers on when, where and how archaeological remains should be considered as part of the planning process. The latter may commence with an HER search but might also require the preparation of a desk-based assessment, and/or additional site investigation in support of a development proposals, or in response to a planning permission. Policy En7, 2(d) – We are not aware that the Local list is actually complete, so it will require more than being kept up to date.

	Policy En7, 2(g)iii – text should read ‘coal mining’.
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