

Hinckley & Bosworth Borough Council Regulation 19 Pre-Submission Consultation Draft Local Plan 2024 – 2045 (August 2026)

Comments from Leicestershire County Council

<i>Any overarching comments</i>	Public Health supports policies seeking to improve health and wellbeing and reduce health inequalities in the Borough. It particularly supports Policy HPD05 – Health and Wellbeing and Policy HPD06 – Hot Food Takeaways and Fast-Food Outlets. From an education perspective, School Organisation are satisfied that the Proposed Submission Draft Local Plan (Regulation 19) adequately reflects current educational requirements and accommodates potential future variations in school organisation. We actively encourage continued engagement with the Planning Team at Hinckley & Bosworth 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. Generally a strong recognition of the benefits of heritage as a component of sustainable development. Pleasing integration of the historic environment across the Plan, the three conditions provide a robust basis around which to manage land use change and the implications upon heritage and archaeology. All the individual site allocations include or open the door to appropriate assessment of heritage. <u>Comments from LCC as a Landowner</u> Whilst the vision and spatial objectives are largely supported the statement in the vision which states “ Growth will be directed to the most sustainable locations, with Hinckley as the principal urban centre...” is particularly welcomed as are the supporting spatial objectives 11 which seeks to promote a sustainable pattern of development to sustainable locations whilst ensuring an adequate supply of housing land and 13 ii which seeks to maintain the vitality and viability of centres outside the Hinckley urban area. Policy PS01 reflects the requirements of the NPPF and again reiterates the need to support sustainable patterns of growth and direct development to sustainable locations. This is supported by the settlement hierarchy which follows the established pattern of firstly directing growth to the Hinckley urban area and then rural centres such as Barlestone. The concept of safeguarding the development potential outlined at para 6.23 is supported not only in relation to the provision of essential infrastructure required to support future development but also by safeguarding the strategic planning of the borough by protecting the development potential of adjacent or related sites. in relation to the strategic developments the Land North of Normandy Way the future development of Land to the East and West of Stoke Road (SHELAA ref LRP47 and LRP48) regarded as a integral part of a larger strategic development North of Hinckley in the earlier Strategic Growth Plan Growth Options Report needs to be considered in the masterplanning of the partial allocation currently proposed.
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Policy PS04 makes provision for the delivery of 15,687 homes to be delivered in the period 2024-2045 inclusive of a 5% buffer and the agreed contribution towards Leicester City's unmet need. However, the policy fails set out precisely the components which make up its requirement namely the Local Housing Need calculated using the standard method for which the most recent published by government is 667 dph and the unmet need figure from Leicester City derived from the Statement of Common Ground. Without this detail it is not possible to demonstrate that the plan has been 'positively prepared'. Having set out precisely the housing requirement, then an appropriate buffer should be added. The Local Plan Expert Group recommends that a range of 10 – 20% is appropriate and accordingly it is considered that, given the Borough's poor record of delivering strategic sites, 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. Further by increasing the allowance the potential exists to facilitate the delivery of increased levels of affordable housing necessary to reduce the shortfall in meeting currently assessed annual need of 436 affordable homes. The distribution strategy is broadly welcomed with development directed principally to the urban areas and sustainable villages. More detailed comments relating to individual sites will be provided separately. However, the allocation of site BARL001 is strongly supported being a logical extension to existing planned development on Barton Road capable of contributing to the villages long term sustainability; the site being considered both available and deliverable. It is noted that site BARL001 whilst located in Osbaston Parish is regarded as an extension to Barlestone village Accordingly, in relation to the provision of affordable housing it is considered that the relevant percentage required for Barlestone be applied to this allocation.

Policy PS09 – Land North of Normandy Way - Given the evidence provided in the Strategic Growth Plan Growth Options Report which concluded that a 128 hectare site on land North of Normandy Way Hinckley, capable of delivering 3200 houses, was one of the most suitable locations for strategic development across the Leicester and Leicestershire Housing Market Area there appears little justification in making only a partial allocation of 1320 houses as the full allocation including the Land East and West of Stoke Road would ensure an ongoing supply of houses throughout the plan period in a sustainable location. This would facilitate a more coherent framework masterplan, ensure that active travel could be achieved over the wider site and provide additional support to the delivery of social and highways infrastructure through both increased contributions and on-site provision enabling the overall vision for the site set out at para 6.230 to be achieved.

A separate more detailed consultation response will be submitted in support of the proposed allocation of Land to the East and West of Stoke Road (Middlefield Farm). The site which is in the sole ownership of the County Council is considered to be suitable, available and deliverable and capable of delivering much needed housing within the plan period. This has been confirmed by the initial due diligence work that has been undertaken to date. Further, work including the preparation of a draft masterplan and vision statement has been made available to the Council to further inform the emerging plan. 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 an initial phase of development at Barton Road, as well as elsewhere across the county.

Policy PS18 – Circumstances for an Early Review of the Local Plan – Whilst the policy is generally supported by both ensuring the plan is positively prepared fully addressing the Borough's housing need and the unmet need of adjoining authorities and by

	increasing the 5% buffer to a minimum of 15% the plan would be provided with greater certainty and resilience thereby mitigating against the potential circumstances that would trigger a review. Policy PS23 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 PS24 is seen as important as it provides the ability to bring forward additional small sites to meet the needs of local communities, support local services and facilities and contribute to meeting housing numbers and 5-year supply. Policy HH02 – 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 436 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. Policy HH03 – Housing Mix, Size and Type – The policy seeks to follow the evidence of the HENA which is supported whilst the caveats relating to alternative mix to meet local market needs and viability considerations are seen as enabling otherwise constrained development to be brought forward, Policy HH07 – Redundant Rural Buildings – The policy is seen as complimenting existing permitted development rights and is generally supported. Policy HH08 provides that residential developments of 100 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. However, the ability for this requirement to be reduced or waived where it is robustly demonstrated that the serviced plots have been actively marketed for a minimum period of 12 months with no reasonable interest is seen as essential.
<u>Section</u>	<u>Specific comments (please include paragraph numbers/page numbers where relevant)</u>
<i>PART A: Setting the Context for the Local Plan</i>	
3. What is the Local Plan?	Welcome separate section on Neighbourhood Planning. In particular, 3.16 highlight support to Neighbourhood Plans, 3.17 Highlighting the significance of existing and future Neighbourhood Plans within the decision-making process and 3.18 demonstrating strong support for Neighbourhood Plans and the process.

	Paragraph 3.17 – the link to the neighbourhood planning web pages is incorrect (takes you to directly to Desford’s Plan) Paragraph 3.20 – suggest including a hyperlink to the Strategic Growth Plan website Paragraph 3.23 - welcome the early refence as to how the Plan enables the delivery of the Strategic Growth Plan. Paragraph 3.26 – reference to recent legislative changes to remove the statutory Duty to Cooperate should be updated to highlight that this change has now come into force. Paragraph 3.33 – states that the Leicester and Leicestershire authorities (excluding Leicester City and Oadby and Wigston Borough Council) prepared a separate Statement of Common Ground to address the distribution of strategic B8 (storage and distribution) employment land across the FEMA. This is incorrect. Leicester City and Oadby and Wigston Borough Council are both signatories to this SoCG. If the intent was to highlight those authorities not receiving apportionment of strategic B8, then reference should be corrected and also include Melton Borough Council.
4. Spatial Portrait	Welcome the recognition of the challenges associated with an ageing population, rural isolation, access to services and health inequalities. This provides a sound evidence base for future policy interventions. Paragraph 4.7 – suggest minor amendment, “...including the Bosworth Battlefield being of significant international historical and cultural interest...” Paragraph 4.290 - Caution should be exercised in quoting Census data from 2021, including ‘data on working from home’ as they are skewed by the impacts of the pandemic and various restrictions imposed by the Government, including lockdowns. The Plan should be modified to place the data in context. Paragraph 4.36 – suggest minor amendments, “The borough of Hinckley and Bosworth consists of many historical heritage sites of which some are famously known within Britain’s history, such as the Bosworth Battlefield.”
5. Vision and Objectives	Suggesting making the following changes to the vision: <i>The borough will respond positively to climate change by reducing carbon emissions, promoting energy efficiency, supporting renewable and low-carbon energy, and adapting to future climate impacts and managing waste sustainably. Development will contribute to a greener borough, enhancing biodiversity, delivering nature recovery and strengthening green infrastructure networks, including through the role of the National Forest.</i> The new vision makes reference to a greener borough. Therefore, we feel it's important there should be reference to sustainable waste management and not just a sole focus on carbon reduction.

	There is strong support for the emphasis on healthy, inclusive communities; social infrastructure; equitable access to housing, services and employment; and support for rural communities. Consider explicit reference to community resilience, volunteering, community-led activity and reducing loneliness and social isolation. Places – Environmental Objectives, 6 Natural Environment and Nature Recovery, i – suggest minor amendment to wording. “To conserve and enhance the natural environment, protect and enhance biodiversity and geodiversity, and deliver a connected network of multifunctional green and blue infrastructure.” This would reflect the references to blue infrastructure elsewhere in the document, e.g. paragraph 6.151 and 6.157 and Policy NE03 and NE04.
PART B: The Development Strategy	
6. Principles and Strategy	
Policy PS01 – Presumption in Favour of Sustainable Development	Would suggest Policy PS01, b) iii) is amended to “the efficient use of land and natural resources; ”
Settlement Hierarchy Review	
Settlement Boundary Review	
Safeguarding Development Potential	
Policy PS02 – Hinckley Western Link Road	The inclusion of this policy is welcomed and supported in principle. Transport evidence underpinning the Plan shows that the ‘Hinckley Western Relief Road’ (HWRR), if delivered to an appropriate standard, has significant benefits in terms of enabling the Plan’s delivery (that is to a standard that should achieve the delivery the forecast benefits in reality). However, on its own it is not a strategic, longer-term solution to the issues on the A5 corridor at this location. In reality such a solution is likely to require a coordinated approach to the delivery of the HWRR as a complementary measure to a strategic scheme brought forward through investment via the Road Investment Strategy process. In line with the Local Transport Authority’s (LTA) substantive comments, it is expected that National Highways will engage proactively in the identification and development of an overall integrated solution, that is one that enables the delivery of new homes and jobs as set out in the Plan; address current issues on the A5 corridor in the area, including by the implementation of active and sustainable measures to remove shorter distance trips from the corridor/crossing the corridor; and provides the ability to unlock growth in the corridor in the longer-term beyond the Plan’s timeframe. In the interest of clarity, the LTA would welcome the opportunity to work with the borough council to identify and agree a proposed modification to the text such that the purpose of the HWRR is placed in proper context.

	Paragraph 6.27: For the purposes of clarity, it the Plan should be modified to note that National Highways are responsible for the management and maintenance of the Strategic Road Network. Would suggest moving the Figure to below the policy text and before the supporting text.
Policy PS03 – Nuneaton Parkway	The inclusion of this policy is welcomed and supported in principle. The Local Transport Authority looks forward to continuing to work with Warwickshire County Council and other partners to understand how the introduction of this station might have implications for stopping patterns on this rail route, including at Hinckley Station. (Noting that should Midlands Connect's proposals for achieving increased numbers of passenger services between Leicester and Birmingham and the restoration of direct Leicester to Coventry services be delivered, this would give a greater flexibility of stopping patterns.) Would suggest moving the Figure to below the policy text and before the supporting text
Policy PS04 – Delivering Sustainable Growth	See the Local Transport Authority's substantive comments in respect of the Plan's spatial strategy. Should 'completions and existing commitments' also be listed under Employment Land Delivery? Paragraph 6.60 – the text appears to incorrectly describe the 2021 strategic B8 study as the most recent evidence. This section also refers to the updated October 2025 report, and is upon which the B8 requirement for Hinckley & Bosworth is based Paragraph 6.63 – wording appears unclear, "Not allocated capacity is expected to be developed"? Welcome the wording inclusion for Neighbourhood Plans.
Policy PS05 – Housing Development Sites	A number of these sites were flagged as being within Mineral Safeguarding Areas at Reg 18 stage. Despite this, it appears that there is no mention in the supporting or policy text of the need to ensure that sites are in accordance with Policy M11 of the LMWLP or Policy W9 on waste safeguarding. We would repeat that it is important that mineral is not sterilised unnecessarily and that sensitive uses are not introduced near existing or permitted waste (or mineral) facilities unless 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. This is in line with the 'agent of change' principle in NPPF. Welcome references to sites allocated within Neighbourhood Plans.
Strategic Allocation Sites	Paragraph 6.159 – See the Local Transport Authority's substantive comments in respect of the Plan's proposed funding mechanisms. Paragraph 6.162 – references to Supplementary Planning Documents should be updated.

Policy PS06 - Strategic Site: Earl Shilton Sustainable Urban Extension (SUE)	Paragraph 6.167 and 6.168 refer to and are equally relevant to both the Earl Shilton and Barwell SUEs, so should potentially be put under a separate heading, rather than only under Policy PS06 - Strategic Site: Earl Shilton Sustainable Urban Extension (SUE), or repeated in full under both Policy PS06 or PS07. Similarly Paragraph 6.172 refers to both SUEs in the context of Gypsy and Traveller provision. Paragraph 6.171 contains the first of a few references to ‘the Urban South’ but this location/what it encompasses is not qualified.
Policy PS07 - Strategic Site: Barwell Sustainable Urban Extension (SUE)	Unclear why text at 6.176 for the Barwell SUE is different to text at 6.172 for the Earl Shilton SUE.
Policy PS08 - Strategic Site: Lindley Meadows, Land North of Watling Street	The Local Transport Authority has noted in the County Council’s previous consultation responses that the delivery of site of this scale will be particularly challenging from a transport perspective given conditions on the A5 corridor. Thus, it appears to be particularly important that the delivery of this proposed allocation site is aligned to a coordinated approach to the development of proposals for schemes/investment in the A5 corridor, as per the Local Transport Authority’s substantive comments. Paragraph 6.202 - The Local Transport Authority welcomes the reference to its emerging Enabling Transport Choice Strategy (ETCS). It would welcome the opportunity to work with the borough council to seek to identify and agree proposed Main Modifications such the policy itself also reflects the contents of the ETCS. Please also see the Local Transport Authority’s substantive comments for further in respect of the Plan reflecting the ETCS. Paragraph 6.209 – The supporting text states “cross-boundary matters and infrastructure matters have been addressed through ongoing joint working, including with Leicestershire County Council and National Highways, as reflected in the relevant statement(s) of common ground”. It is not clear what specific matters nor which statement(s) of common ground are being referred to here and this wording is potentially misleading as to the extent of the County Council’s involvement and agreement to addressing any cross-boundary and infrastructure matters. The County Council anticipates a SoCG to be entered into between (at the least), itself, National Highways and HBBC to set the approach to coordinating investment in the A5 corridor but there is no agreement to date. We welcome the inclusion of contributions for waste facilities in the policy, where required. We also welcome the requirement for provision for waste and recycling storage.
Policy PS09 - Strategic Site: Land North of Normandy Way, 'Hinckley North', Hinckley	We welcome the inclusion of contributions for waste facilities in the policy, where required. We also welcome the requirement for provision for waste and recycling storage.

Policy PS10 - Strategic Site: Land West of Hollycroft Grange, Hinckley	We welcome the inclusion of contributions for waste facilities in the policy, where required. We also welcome the requirement for provision for waste and recycling storage.
Policy PS11 - Strategic Site: South of the A47, Earl Shilton	We welcome the inclusion of contributions for waste facilities in the policy, where required. We also welcome the requirement for provision for waste and recycling storage.
Policy PS12 - Strategic Site: Land South of Desford, Desford	We welcome the inclusion of contributions for waste facilities in the policy, where required. We also welcome the requirement for provision for waste and recycling storage.
Policy PS13 - Employment Development Sites	
Policy PS14 - Strategic B8 Employment Site: HIN004 Land at Wapping and Harrow Farm, Watling Street, Hinckley	How this site is developed and delivered is especially critical to the delivery of the 'Hinckley Western Relief Road' to an appropriate standard. Recognising that any development needs to operationally fit for purpose and viable, nevertheless should there be a failure to deliver the road to an appropriate and suitable standard, this would undermine the overall package of transport measures required to mitigate the Plan's impacts to the extent reasonable possible, which in turn would run the risk of undermining the Plan's effective delivery. In the interests of the Plan's effective delivery, the supporting text to the policy should be modified such that this is more clearly stated.
Policy PS15 - Strategic B8 Employment Site: BURB001 Land South of Soar Brook, Burbage	It appears to be particularly important that the delivery of this proposed allocation site is aligned to a coordinated approach to the development of proposals for schemes/investment in the A5 corridor, as per the Local Transport Authority's substantive comments. As flagged at Reg 18 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. We welcome the recognition that wastewater capacity is an important consideration.
Policy PS16 - Strategic B8 Employment Site: BURB002	Whilst the policy requirement that the delivery of suitable and highways infrastructure and access should not prejudice or pre-empt National Highways funding to the A5 Hinckley-Tamworth corridor is welcomed, this policy is inconsistent with other policies

Land East of Hinckley Park, Burbage	that seek to allocate development in or around the A5 corridor, such as policies PS08, HIN004 and BURB001. The Plan should be modified to ensure consistency of policies in terms of avoiding funding to the corridor being prejudiced or pre-empted. Reference to the ‘Hinckley Western Relief Road’ in this policy is inconsistent with reference to the proposal in other allocation policies. The Plan should be modified to ensure consistency. As flagged at Reg 18 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. We welcome the recognition that wastewater capacity is an important consideration.
Policy PS17 - Strategic B8 Employment Site: MARK004 Land at Cliffe Hill Farm, (Junction 22 M1) Markfield	We welcome the recognition that wastewater capacity is an important consideration.
Policy PS18 - Circumstances for an Early Review of the Local Plan	Paragraph 6.362 – suggest the wording is clearer/explicit about the specific SoCG that is being referred to here.
Policy PS19 - Strategy for the Urban Areas	Minor point but the four settlements that make up the ‘Urban Area of the borough’ are inconsistently ordered when referred to in various parts of the Local Plan. These should probably be consistent (alphabetical?) to avoid any perceived importance/weighting attributed to any of the settlements. Settlements in PS20 and PS21 are ordered alphabetically. Typo in ‘Retain, m)’ – “Fully support the conservation and preservation of Burbage Common and Woods, in particular it’s ecological, landscape and biodiversity assets and community benefits.”
Policy PS20 - Strategy for the Key Rural Centres	Welcome the recognition of rural communities. Development should continue to support access to local services and facilities to help reduce social isolation and support community resilience. This is particularly important given evidence regarding ageing populations and service accessibility in rural areas.

	Paragraphs 6.387, 6.396 & 6.400 - Welcome the recognition of current and emerging Neighbourhood Plans and support provided, throughout the settlement hierarchy.
Policy PS21 - Strategy for the Rural Villages	Paragraph 6.395 – The supporting text refers “The requirement for a minimum 12-month active marketing period in relation to the loss of the last remaining community facility of a type is justified...” It is unclear what this requirement is as-is not referenced in the policy text itself (nor clearly linked to another policy). Support the objective of sustaining rural communities. Consider ensuring that future growth helps maintain community facilities, opportunities for social interaction and access to services for residents of all ages.
Policy PS22 - Strategy for the Rural Hamlets	
Policy PS23 - Development in the Countryside	We welcome the recognition that minerals and waste development, and renewable or low-carbon energy production can be appropriate in the countryside. We welcome paragraph 6.416 and its recognition that policy evolves over time. As stated in our overarching comments, any reference to the LMWLP should also state ‘<i>or successor policies</i>’. The heading ‘Small-scale residential development immediately adjacent to the Settlement Boundary’ for Policy point g) should be in bold typeface.
Policy PS24 - Small-scale Residential Development Immediately Adjacent to the Settlement Boundary	Paragraph 6.428 - welcome reference to separate boundaries identified within Neighbourhood Plans.
PART C: Development Management Policies	
7. Healthy Place-Making and High Quality Design	
Policy HPD01 - High Quality Design and Design Requirements	We welcome the requirement for provision for waste and recycling storage, access and collection. We also welcome the requirement for waste arrangements for other major development and mention in paragraph 7.7 that waste and recycling storage is an essential component of high-quality design. Also welcome encouragement of early engagement with Neighbourhood Planning groups. Similar wording put forward by NWLDC in their Regulation 19 Local Plan document would be useful for Parish Councils to give them first refusal for taking on responsibility for the future maintenance and management of Play areas/community assets - ‘<i>Developers should demonstrate</i>

	<i>(through a management or stewardship strategy or equivalent document) how they have engaged meaningfully with the Council, Town and Parish Councils on the management and maintenance of qualifying assets. Through that engagement, Developers will give first opportunity for the management and maintenance of assets to these organisations before use of other bodies such as management companies.'</i>
Policy HPD02 - Design Principles	We welcome the requirement in criterion m for the integration of waste storage, access and management. We welcome the recognition at paragraph 7.19 of the importance of getting the location and design for waste storage right. Suggest adding the following text highlighted to strengthen this statement: 'm) Integrates waste storage, access and management v. support opportunities for responsible on-site waste minimisation including reduction, reuse and recycling.'
Policy HPD03 - Enabling Active Design and Sustainable Travel Choice	This policy and way that it reflects the Local Transport Authority's emerging Enabling Travel Choice Strategy is welcomed.
Policy HPD04 - Preventing Pollution	We welcome the requirement that impacts must be mitigated where development introduces new sensitive uses near existing pollution sources, or new sources near existing receptors. We also welcome the inclusion of the Agent of Change Principle in relation to noise pollution. This will hopefully help to protect extant minerals and waste operations in line with Policy M11 and W9.
Policy HPD05 - Health and Wellbeing	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. Following previous recommended changes to policy officers, the Public Health team still propose changes to strengthen policy wording and ensure the specific requirement for developers to use the LCC HIA template is included within policy text: <i>'A local HIA template and guidance has been developed by the Leicestershire County Council Public Health team. The level of information required in the HIA will be proportionate to the scale and nature of the development proposed. The Leicestershire HIA template is to be used, and is available on the Leicestershire County Council HIA webpage. If the need for a HIA is identified, the Leicestershire HIA template is to be used, and the level of information required should be proportionate to the scale and nature of the development proposed. The HIA should have regard to the most up to date guidance from the Office for Health Improvement and Disparities (OHID), and/or locally adopted standard procedures. Development proposals should demonstrate how the conclusions of the HIA have been taken into account in the design of the scheme.'</i> Public Health request that the link to the LCC webpage where the HIA template is held be included either in the policy text or supporting text. The webpage is here: Health Impact Assessments Leicestershire County Council Professional Services Portal
Policy HPD06 - Hot Food Takeaways 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. Leicestershire County Council Public Health team have worked closely with Hinckley and Bosworth to support where useful the production of this policy. Public Health support Policy HPD06 in its restriction of hot food takeaways and

	fast-food outlets as well as in identified locations where a concentration of such uses is having an adverse impact on local health, in line with NPPF. A Health Impact Assessment is a process that ensures the impact of development on health and wellbeing is considered and where necessary, responded to. Public Health also support the requirement for the completion of a proportionate Health Impact Assessment for units in locations outside of the 400metre radius. Paragraph 7.94 - Welcome inclusion as this will enable Neighbourhood Plans to link into this policy and evidence base to support their future development requirements.
Policy HPD07 - Waste, Recycling & Refuse: Storage, Access and Collection	We welcome the policy and its requirements for recycling and refuse storage, access and for major residential development a Waste Management Strategy.
8. Delivering Housing and Housing to meet different needs	
Policy HH01 - Gypsies, Travellers and Travelling Showpeople	The Council's acknowledgement of the accommodation needs of Gypsies, Travellers and Travelling Showpeople, and the inclusion of a specific policy response, is welcomed. It is also acknowledged that the policy is informed by the Gypsy and Traveller Accommodation Assessment and seeks to address both identified need and future monitoring requirements. This representation is made in relation to the effectiveness, clarity and deliverability of Policy HH01. However, while the overall intent of Policy HH01 is supported, there are matters of soundness and deliverability which should be addressed to ensure the policy is effective over the plan period. <i>Part 1: Criteria for New Sites and Pitches/Plots</i> Criterion 1(a) places considerable emphasis on facilitating the traditional and nomadic way of life. However, following the Court of Appeal's judgment in <i>Smith v Secretary of State for Levelling Up, Housing and Communities</i> [2022] EWCA Civ 1391, continued reliance on travelling status as a key planning distinction is increasingly difficult to justify. The primary purpose of Policy HH01 should be to address identified accommodation need through the delivery of suitable, secure and affordable pitches, irrespective of whether households continue to travel. Consideration should therefore be given to whether criterion 1(a) remains necessary or effective in meeting the objectives of the policy. The purpose of criterion 1(b) would benefit from further explanation to clarify how it contributes to meeting identified need and supporting sustainable site delivery. The determining consideration should be whether a proposal would meet identified need in a suitable and sustainable location. The policy should avoid placing undue weight on historic patterns of provision where this could constrain effective delivery.

Strategic Site Contributions

The requirement for strategic developments to contribute towards Gypsy, Traveller and Travelling Showpeople accommodation is supported in principle. However, the option for developers to make a financial contribution in lieu of direct provision weakens the certainty of delivery.

Financial contributions do not, of themselves, provide additional pitches. Given the acknowledged difficulties in identifying suitable land and delivering new Gypsy and Traveller accommodation, reliance on commuted sums risks failing to address identified need within the plan period.

Strategic developments should therefore be expected to prioritise direct pitch provision wherever feasible. Where pitches are delivered as part of strategic allocations, consideration should be given to their transfer to, or management by, a Registered Social Landlord, Local Authority or other appropriate public body to secure long-term availability, affordability and effective management.

This would provide a more certain and measurable contribution towards meeting identified need than financial contributions alone. MATU's operational experience, supported by wider site-design evidence, indicates that smaller family-based sites are often more manageable and sustainable where they are well located, appropriately designed, affordable and effectively managed. Provision in the order of five to ten pitches may therefore provide a practical delivery model in appropriate circumstances.

Deliverability

The Plan identifies a requirement for 84 Gypsy and Traveller pitches and 12 Travelling Showpeople plots over the plan period, but acknowledges that sufficient deliverable and developable sites have not been identified to meet that need in full. The absence of committed supply for Travelling Showpeople plots is a particular concern.

Reliance on windfall development, intensification and future strategic site contributions introduces uncertainty. The policy should be strengthened to identify how additional pitches and plots will be secured, and what further action will be taken if delivery falls behind identified need during the plan period.

The proposed monitoring framework and identified triggers are supported. Consideration should be given to specifying the timescales and mechanisms through which remedial action will be taken where a shortfall is identified.

Transit Provision

The Plan states that the GTAA has not identified a current need for permanent public transit provision within the borough. That conclusion is noted; however, it should not be treated as determinative of whether transit provision may be required or appropriate during the plan period.

Transit need is not necessarily district-specific. Other authorities in Leicestershire have recognised a wider strategic need for publicly managed transit provision across Leicester, Leicestershire and Rutland. Such provision is most appropriately considered through a coordinated cross-boundary approach.

Accordingly, the absence of a quantified borough-specific requirement should not preclude delivery in Hinckley and Bosworth if a suitable and deliverable site is identified, nor should it prevent the borough from contributing to wider countywide provision.

A positive and enabling policy framework should therefore be retained for transit sites, temporary stopping places and negotiated stopping arrangements. This would ensure that future opportunities are not unnecessarily constrained and that the Council can respond to emerging evidence, site availability and partnership working, including through the Leicester, Leicestershire and Rutland Transit Sites Working Party.

Partnership Working

The references to partnership working with the Multi Agency Traveller Unit are welcomed. Continued collaboration with MATU, neighbouring authorities and other partners will be necessary to monitor need, manage unauthorised encampments, and support delivery of both residential and transit provision.

Conclusion

Policy HH01 is supported in principle; however, modifications should be considered to improve clarity, effectiveness and deliverability. In particular, the Council should reconsider criteria 1(a) and 1(b), strengthen the expectation for direct pitch delivery through strategic developments, and avoid undue reliance on financial contributions which may not result in additional pitches.

The policy should also retain a positive approach to transit provision, recognising that transit need is strategic rather than solely district-specific. A supportive policy framework would enable delivery within Hinckley and Bosworth, or support provision elsewhere in Leicester, Leicestershire and Rutland, where this contributes to meeting wider identified need.

Further comments:

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 criterion (n) covers residential amenity and neighbouring uses, this perhaps do not fully cover the ‘agent of change’ principle in NPPF. The policy should 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.

Paragraph 8.9 – typo – “In terms of the five-year requirement for Travelling Showpeople, there is unfortunately no committed supply position at this stage as not sites with potential for allocation...”

Policy HH02 - Affordable Housing	Consider encouraging engagement with local communities and relevant service providers when determining the mix and type of affordable housing to help ensure provision reflects identified local need and supports sustainable communities. This may be particularly beneficial for younger people, older people and those requiring specialist housing.
Policy HH03 - Housing Mix, Size and Type	Paragraph 8.13 - welcome the inclusion to compile with Neighbourhood Plan policies/Housing Need Assessments Paragraph 8.18 - Welcome reference to evidence with Neighbourhood Plans that Bungalows support older household to downsize and meet local need.
Policy HH04 - Space Standards	
Policy HH05 - Housing Density	Query whether the policy need to be clearer about stating any density requirement (or not) for developments outside of urban area/key rural centres/rural villages, i.e. hamlets and countryside.
Policy HH06 - Accessible Housing	Strongly support the provision of accessible and adaptable homes in helping residents remain independent and connected to their communities as needs change over time.
Policy HH07 - Redundant Rural Buildings	
Policy HH08 - Self-Build and Custom Housing	We welcome the policy and its recognition that wastewater management is an important infrastructure consideration in the planning of self-build and custom housing. Paragraph 8.54 - Would be useful to reference whether HBBC see Neighbourhood Plans as being best placed to identify self-custom build requirements within their areas and encourage Neighbourhood Plan policies to reflect this.
Policy HH09 - Rural Needs Housing	
9. Infrastructure, Transport, Highways and Utilities	
Policy IU01 - Infrastructure and Delivery	The text is ambiguous in its reference to 'infrastructure levy'. The Plan should be modified to clarify the reference. See also separate text in Leicestershire County Council's Cabinet Report (8 th September 2026) which provides the LTA's substantive comments in respect of the Plan's funding mechanisms.

	We welcome the acknowledgement at paragraph 9.1 that waste management facilities are critical infrastructure. Welcome recognition of social infrastructure. Consider ensuring that community facilities and spaces are delivered alongside housing growth to support community development and cohesion from the earliest stages of development. 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 IU02 - Water Supply and Wastewater Management	We welcome the policy and its recognition that wastewater management is an important infrastructure consideration, however 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 employing a more stringent water consumption target such as 95 litres/person/day.
Policy IU03 - Telecommunications Infrastructure	
Policy IU04 - Highways and Transportation	Paragraph 9.30 – would suggest wording is reconsidered against the 2024 NPPF in that there are qualifications around severe cumulative impacts i.e. “...the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.” In referring to ‘<i>peak time traffic movements</i>’ the wording part c of this policy is inconsistent with the wording of the paragraph 116 of the National Planning Policy Framework December 2024. The Plan should be amended to ensure that it is consistent with national policy. See also 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 transport cumulative impacts. Paragraph 9.28 - With respect to the Local Transport Authority’s emerging Enabling Travel Choice Strategy, an existing bus route is only of benefit if it links future residents on an allocation site to their everyday service and facility needs. Similarly, if it links a new place of employment to suitable labour pools. The Plan should be amended to reflect this. See also 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 ‘transport strategy’.
Policy IU05 - Electric Vehicle Charging Infrastructure	

10. Natural Environment	
Policy NE01 - Protecting Biodiversity and Geodiversity	Whilst the text around the River Mease SAC appropriately refers back to Policy HPD04, the policy text as written could more clearly convey that development may be acceptable should there be suitable mitigation provided.
Policy NE02 - Enhancing Biodiversity and Habitat Connectivity	Typo at paragraph 10.8 and in policy NE02: should read Leicestershire, Leicester and Rutland Local Nature Recovery Strategy not Leicester, Leicestershire and Rutland Local Nature Recovery Strategy. No mention of the strengthened Biodiversity Duty that requires all public bodies including LAs to protect and enhance biodiversity and how this duty will be applied within the local plan.
Policy NE03 - Green Infrastructure	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 NE04 - Blue Infrastructure	We welcome the recognition at criterion (k) that restored or partially restored minerals and waste sites give an opportunity for the enhancement of blue infrastructure opportunities. 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.
Policy NE05 - Landscape Character and Sensitivity	
Policy NE06 - Green Wedges	
Policy NE07 - National Forest & Charnwood Forest	
Policy NE08 – Trees, Hedgerows and Woodlands	
Policy NE09 – Local Green Space	

Policy NE10 – Soils and Best and Most Versatile Agricultural Land	We welcome the policy and its requirement for the reclamation and restoration of soil resources and land following mineral working or landfilling to an equivalent or improved quality. There are already policies in the LMWLP which cover Soils (DM6) and Restoration (DM12). The intent of the policy is clear and complimentary to the LMWLP, and so this is welcomed. Care must be taken with this kind of policy that it does not contradict or undermine the policies of the LMWLP as strategic policies. Further, district Local Plans should not cover matters for the minerals and waste planning authority.
11. Heritage and Conservation	Welcome reference to non-designated heritage assets within Neighbourhood Plans, throughout the section.
Policy HC01 – Conserving and Enhancing the Historic Environment	Needs to reflect/anticipate changes to current NPPF. HC01 a). Might consider ‘appropriate weight’ rather than ‘great weight’, with reference to national policy. Paragraph 11.5 lines 3-4 - In addition to designated heritage assets there are a substantially greater number of non-designated assets of varying levels of heritage significance. Paragraph 11.6, line 6 - Delete ‘greater’ replace with ‘more substantial...’:
Policy HC02 – Heritage Assets	Policy wording, paragraph 2, lines 2-3 - The statement should be proportionate to the asset(s) significance and the complexity of the proposal, should identify all known and anticipated the potential for new heritage assets to be affected. Paragraph 11.13 - In determining planning applications, the Borough Council will consider the applicant’s submitted supporting information, including their heritage assessment, to ensure adequate consideration of the impact of development upon the historic environment. Where appropriate this may result in the request for additional information, up to and including evaluation of the application site (ref.: HC03). Paragraph 11.21, line 2 - delete ‘great weight’, replace with ‘appropriate weight’.
Policy HC03 – Preserving the Borough’s Archaeology	Paragraph 11.30 - remove ‘approved’
12. Energy, Resources and Resilience	
Policy ER01 – Net Zero Carbon: New Residential Development	The County Council welcomes the use of measurable performance-based standards and the emphasis on reducing energy demand before renewable generation is considered. The County Council recommends explicit reference to Policy ER03 to ensure that the delivery of highly energy-efficient homes does not inadvertently increase overheating risk.

	Consider adding clarification on the intended scope of EUI for point a(i), for example does this include unregulated energy demand?
Policy ER02 - Net Zero Carbon: New Non-Residential Development	Consideration should be given to explicitly recognising the need for non-residential buildings to remain resilient to future climate conditions throughout their operational life. The Council recommends explicit reference to Policy ER03 to ensure overheating risk is addressed alongside energy efficiency measures.
Policy ER03 - Overheating in New Buildings	The County Council strongly welcomes the inclusion of a specific overheating policy and recognises overheating as a significant and increasing climate related risk. The County Council recommends explicit recognition of vulnerable groups who may be disproportionately affected by overheating, particularly within care, health and specialist housing settings. In these settings, the air conditioning end of the cooling hierarchy would be much more appropriate.
Policy ER04 - Renewable and Low Carbon Energy Generation	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 ER05 - Embodied Carbon and Waste	Policy majors on development minimising whole-life carbon emissions arising from construction, but reference should also be made to how policy supports reduced emissions <i>post-construction</i> too. We welcome the policy and the waste hierarchy principles within it and the supporting text. Suggest removing the words highlighted below as we feel it does not add to the paragraph and is sufficient to use just materials, as the context of the circular economy on new developments is referenced in the second sentence. Paragraph 12.75 <i>The circular economy seeks to reduce waste and environmental impacts by keeping materials and buildings in use for as long as possible. Applying circular economy principles in new development supports reductions in embodied carbon, conserves natural resources and improves long-term adaptability.</i> The County Council supports the requirement for Whole Life Carbon Assessments and the incorporation of circular economy principles within development proposals. Consideration could be given to the inclusion of measurable targets/benchmarks for embodied carbon emissions from the work done by LETI, RIBA and others.

Policy ER06 - Flood Risk	To ensure consistency with other Local Plans within Leicestershire, please consider the following requirement on surface water drainage runoff rates: “for all development (including brownfield), demonstrate that the peak surface water runoff rate is limited to the Qbar greenfield rate (minus 20%), or to a rate which mitigates the risk of blockage, whichever is greater.” This text should replace the following within the Local Plan, which lacks robustness and falls short of national standards: <i>“Runoff rates should be as close as possible to pre-development greenfield rates, as informed by a Drainage Strategy, where relevant.”</i> Consider reiterating the wording of Policy NE04 (Blue Infrastructure) around 10 metre and 8 metre easements into Policy ER06 or within Sections 12.112 to 12.114 relating to Watercourses, Infrastructure and Residual Risk. Consider recognising the importance of community resilience and preparedness alongside physical flood mitigation measures, particularly for vulnerable residents and rural communities. Development should not lead to increased flood risk within the development area, locally outside the development area or downstream within the catchment. Developers should be encouraged to plan drainage design on a catchment wide basis and not solely on a site basis. The Council recommends stronger emphasis on natural flood management and blue-green infrastructure solutions as a means of reducing flood risk and improving climate resilience.
Policy ER07 - Sustainable Drainage Systems	Please reword paragraph (e) of Policy ER07 (identical request submitted for ER06 as above) or a reduced version if including the full wording in ER06: “for all development (including brownfield), demonstrate that the peak surface water runoff rate is limited to the Qbar greenfield rate (minus 20%), or to a rate which mitigates the risk of blockage, whichever is greater.” The Council encourages a stronger preference for above-ground and vegetated SuDS features, such as swales, rain gardens, detention basins and wetlands, before reliance on below-ground or engineered drainage infrastructure. Long-term maintenance and management arrangements should ensure SuDS continue to function effectively throughout the lifetime of development, including replacement of failed planting.
13. Economic Prosperity	
Policy EP01 - Existing Employment Area	
Policy EP02 - New Employment Development on non-allocated sites	

Policy EP03 - Education and Skills for a Strong Local Workforce	
Policy EP04 - Growing and Diversifying the Rural Economy	
Policy EP05 - MIRA Technology Park: Employment and Enterprise Zone Development	
14. Supporting Our Communities and Teams	
Policy CT01 – Hinckley Town Centre	
Policy CT02 – Vitalising Borough, Local and Neighbourhood Centres	Welcome the recognition of local and neighbourhood centres. These facilities play an important role in supporting social interaction, reducing isolation and maintaining vibrant local communities.
Policy CT03 – Sequential and Impact Tests	
Policy CT04 – High Quality Shop Fronts and Advertisements	
15. Leisure, Sport and Tourism	
Policy LST01 – Community, Cultural & Tourism Facilities	Strongly support the protection and enhancement of community and cultural facilities. These assets make an important contribution to community wellbeing, social cohesion, volunteering opportunities and local identity.
Policy LST02 – Twycross Zoo Special Policy Area	

Policy LST03 – Open Space Provision	Paragraph 15.47 - We welcome the recognition that regard should be had to Policy M11 of the Leicestershire Minerals and Waste Local Plan where open space is proposed in a Mineral Safeguarding Area. And that a Mineral Assessment may be required. Welcome the provision of accessible green space. Open spaces provide important opportunities for physical activity, informal social interaction and wellbeing for residents of all ages.
Policy LST04 – Sport and Recreation Facilities: Outdoor & Indoor Provision	Paragraph 15.58 - we welcome the recognition that a Mineral Assessment may be required where outdoor or indoor sport facilities are proposed and that regard must be had to Policy M11 of the LMWLP. Consider inclusion on stewardship paragraph with wording as against comment HPD01. This provides councils with opportunity to take on developer built play areas etc rather than management companies if they so wish.
Any other Comments	Consider recognising the importance of early community development activity alongside physical infrastructure to help create cohesive and sustainable communities.