

CABINET - 8 SEPTEMBER 2026**AGENDA ITEM 17 - RESPONSE TO THE HINCKLEY AND
BOSWORTH BOROUGH COUNCIL REGULATION 19 LOCAL PLAN
CONSULTATION.****COMMENTS FROM THE ULVERSCROFT RESIDENTS GROUP****Briefing for Leicestershire County Council Meeting 8 September:****Response to Hinckley & Bosworth Regulation 19 Local Plan****MARK004 / M1 J22 – cumulative transport and infrastructure implications for Markfield**

I am writing as the **lead representative for the Ulverscroft Residents Group**. We have been examining the evidence supporting the proposed Local Plan, particularly **Policy PS17 / MARK004 at Cliffe Hill Farm, M1 Junction 22**, and the cumulative infrastructure implications of the wider growth proposed around Markfield.

We recognise that responsibility for selecting Local Plan allocations rests with HBBC and that LCC must reach its own professional conclusions. We are asking LCC to consider whether the evidence sufficiently demonstrates **why MARK004 is justified, what additional pressure it places on the transport network, and whether the infrastructure required to accommodate MARK004 alongside wider growth is both deliverable and sufficient.**

This is particularly important because Markfield sits immediately alongside the Charnwood boundary. **The infrastructure affected by development does not stop at the HBBC boundary**, and LCC has a unique strategic role in considering those cumulative effects.

1. Why is MARK004 needed?

We do not dispute the identified Leicester and Leicestershire need for strategic logistics floorspace, nor that proximity to M1 Junction 22 gives MARK004 a genuine strategic freight-location advantage.

However, HBBC's evidence identifies a residual strategic B8 requirement of approximately **515,301 sqm**, while the proposed allocations provide substantially more. Our review indicates that the other three strategic B8 allocations can collectively meet the identified quantitative requirement without MARK004.

MARK004 is therefore **not numerically indispensable**. That does not automatically mean it should not be allocated, but it does mean that numerical need alone cannot justify its selection.

The important question is:

What strategic benefit is obtained by allocating MARK004 which justifies the additional transport, environmental and infrastructure consequences arising from its selection?

HBBC has assessed reasonable alternative sites. Our concern is whether the final evidence sufficiently demonstrates why MARK004 forms part of the **most appropriate strategic B8 portfolio**, rather than a portfolio without it.

2. What additional transport impact does MARK004 create?

The July 2026 Forecasting Report includes a Stage 1a **"Without Local Plan"** scenario. However, MARK004 is already included in this baseline because of its live planning history.

Its traffic has therefore **not been omitted**, but the published scenario comparison does not provide a straightforward **"without MARK004 / with MARK004"** assessment showing what selecting MARK004 itself adds to the network.

For a major logistics allocation at M1 Junction 22, we would ask LCC:

Where has the incremental transport consequence of selecting MARK004 been demonstrated, and how did that assessment inform its selection, mitigation and infrastructure requirements?

The live planning application reinforces why this matters. It requires a dedicated A50 entry, separate Whitwick Road egress and associated highway works, and has required continuing consideration by LCC Highways and National Highways. This does not demonstrate that the development cannot be accommodated, but it illustrates the **scale of its highway dependency**.

3. The cumulative picture is wider than MARK004

MARK004 cannot sensibly be considered in isolation.

Alongside it, the Regulation 19 Plan proposes approximately **400 homes through MARK001, MARK002 and MARK003** around Markfield. There are also existing housing and employment commitments, together with development in adjoining Charnwood using the same network.

The modelling itself illustrates the difficulty: MARK001 and MARK004 are already included in Stage 1a because of their planning history, while MARK002 and MARK003 are subsequently introduced as Local Plan allocations. A simple comparison between scenarios therefore does not provide a straightforward before-and-after picture of **all the growth affecting Markfield**.

Residents experience one road network, not separate HBBC and Charnwood networks.

We would therefore ask LCC to consider whether planned allocations, existing commitments and relevant cross-boundary development have been adequately considered together against the capacity of the **A50/A511/J22 corridor**.

4. What happens after the planned interventions?

This cumulative picture makes the results of HBBC's final transport modelling particularly important.

The Forecasting Report identifies **residual cumulative impacts in 2045** at junctions directly affecting Markfield:

Junction	Residual cumulative impact
A511 Field Head Roundabout	PM peak
A511 Flying Horse Roundabout	AM and PM peaks
M1 Junction 22	AM peak – including Cliffe Lane and M1 northbound on-slip

These are not simply existing problems before mitigation. The Forecasting Report expressly identifies them as **residual cumulative impacts after the future intervention scenarios have been modelled**.

The A511 Growth Corridor is central to the infrastructure response. HBBC's Infrastructure Capacity Study states that the scheme is "**due to commence construction in winter 2026**", but the evidence we have reviewed does not establish when the relevant Field Head and Flying Horse improvements will be **completed and operational relative to the development growth which relies upon them**.

This creates two distinct questions for LCC:

Timing – when will the relevant improvements actually be operational relative to MARK004 and the wider planned and committed growth?

Sufficiency – if residual cumulative impacts remain after intervention, what further mitigation, phasing or development controls will be required?

5. Flood risk and infrastructure deliverability

LCC also has an important role as **Lead Local Flood Authority**.

The MARK004 planning application has required substantial further drainage work. Subsequent investigation indicates substantial theoretical capacity in the **900 mm Whitwick**

Road culvert, but our review has not identified an equivalent assessment of the **complete downstream Priory Lane ditch/open-watercourse system**, while defects requiring remedial works have been identified elsewhere in the existing drainage network.

We recognise that the latest LLFA position is more positive and that detailed drainage design belongs primarily within the planning application process.

The strategic question is therefore:

Is LCC satisfied that MARK004, alongside wider cumulative growth affecting the same catchments, has a credible drainage and flood-risk delivery pathway which will not increase flood risk elsewhere?

6. Can the development relied upon actually deliver Policy PS17?

HBBC itself creates a question about the effectiveness of the allocation.

Paragraph 6.346 describes PS17/MARK004 as being **“supplemented by a live planning application, ref 25/00931/FUL”**, with the supporting text identifying access, mitigation, buffers, green infrastructure and comprehensive master planning among the matters necessary for development.

Yet paragraph 6.353 states that applications already submitted **“should not be required to retrospectively comply with requirements set out in this Policy and Plan as a whole.”**

This tension is sharpened by the August 2026 NPPF. Its new national decision-making policies apply to the live application, while the transitional arrangements mean this legacy Local Plan continues under the December 2024 plan-making framework. The application relied upon to support MARK004's deliverability may therefore be determined under a different national decision-making framework without being required retrospectively to comply with PS17.

The effectiveness question is:

If the live application is relied upon as evidence that MARK004 is deliverable, how has HBBC established that the development capable of being permitted will secure the outcomes upon which the effectiveness of PS17 depends?

7. What we are asking LCC to consider

Before LCC finalises its Regulation 19 response, we would be grateful if it could consider five questions:

1. **Justification:** Given that MARK004 is not numerically indispensable, has HBBC sufficiently demonstrated why its selection is justified when weighed against its additional transport and infrastructure consequences?

2. **MARK004's transport impact:** Where is the incremental highway consequence of selecting MARK004 demonstrated, given that its traffic is already included within the Stage 1a **"Without Local Plan"** baseline?
3. **Cumulative growth:** Have MARK001–004, existing commitments and relevant development in adjoining Charnwood been sufficiently considered together against the **single transport network serving Markfield and J22**?
4. **Timing and sufficiency:** Is LCC satisfied that cumulative growth can be accommodated when residual impacts remain at **Field Head, Flying Horse and M1 J22 after intervention**; when will the relevant improvements be operational; and what further measures are required if those interventions are insufficient?
5. **Flooding and deliverability:** Is LCC satisfied that MARK004 has a credible infrastructure and drainage delivery pathway without increasing flood risk elsewhere and, given HBBC's reliance on the live application, that the development capable of being permitted can secure the outcomes required by PS17?

We appreciate that LCC must reach its own professional conclusions and that responsibility for selecting allocations rests with HBBC.

Our request is simply that, before LCC responds to the Regulation 19 Plan, it considers not only whether MARK004 and the wider growth have been included somewhere within the evidence base, but whether the evidence demonstrates **why MARK004 is justified, what it adds to the network, and whether the infrastructure relied upon will be delivered in time and will be sufficient.**

I would be very grateful if you could ensure these matters are brought to the attention of the relevant LCC members and officers.

Kind regards,

Helen Oliver
Ulverscroft Residents Group

Supporting Evidence – Key Primary Sources

MARK004 / M1 Junction 22 – Ulverscroft Residents Group

Key primary sources supporting the accompanying briefing. References are provided to enable the principal evidence to be readily checked.

Briefing issue	Primary source
Strategic B8 need / MARK004	HBBC Employment Land Provision Topic Paper (July 2026) and Regulation 19 Local Plan – strategic B8 requirement, supply and proposed allocation portfolio.
Transport modelling / cumulative growth	HBBC Local Plan Modelling – Forecasting Report (July 2026) – Stage 1a/1b scenario construction and treatment of MARK001–004.
Residual transport impacts	HBBC Local Plan Modelling – Forecasting Report (July 2026), para 6.4.14, pp.76–77 – residual cumulative impacts at Field Head (PM), Flying Horse (AM & PM) and M1 J22/Cliffe Lane/northbound on-slip (AM).
A511 / infrastructure delivery	HBBC Infrastructure Capacity Study Phase 3 (5 August 2026), p.18 – A511 Growth Corridor/Field Head scheme, funding and stated winter 2026 construction commencement.
MARK004 highways and drainage	Planning application 25/00931/FUL – Transport Assessment/Addenda; Road Safety Audits; LCC and National Highways responses; Flood Risk/Drainage Strategy; LCC LLFA responses; Burrows Graham response (30 July 2026).
PS17 / live application / national policy	HBBC Regulation 19 Local Plan, paras 6.346 and 6.353–6.355 – relationship between PS17 and live application 25/00931/FUL. National Planning Policy Framework (17 August 2026), Annex A – decision-making policies and transitional arrangements for legacy plan-making.