

PART A – Personal Details

If you are responding on behalf of yourself, or your own organisation, please fill in all the 'Personal Details' fields. If an agent is appointed, please complete only the Title, Name and Organisation boxes in the Personal Details column, but complete all the 'Agent's Details' fields.

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	David	
Last Name	Trunkfield	
Job Title (where relevant)	Member	
Organisation (where relevant)	Willesley Environment Protection Association (WEPA) Ex Chairman Ashby Housing & Environmental Focus Group	
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Postcode	██████████	
Telephone	██████████	
Email address	██████████	

Did you comment at publication stage of the Local Plan?	X	Yes		No
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<p>If yes, what was your representor ID number? (You can find your Representor ID on our Examination webpages)</p>	<p>Rep 29</p>
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<p>Do you wish to be notified of subsequent stages of the Local Plan?</p>			
<p>Publication of Inspector's Report</p>	<p>X</p>	<p>Yes</p>	<p>No</p>
<p>Adoption of the Local Plan</p>	<p>X</p>	<p>Yes</p>	<p>No</p>

PART B – Your Representation

Please use a separate sheet for each representation

1. To which part of the consultation does this representation relate?

Please note – comments should be restricted to the matters listed only and should not relate to any other aspect, site or policy of the Publication Local Plan

X	Main Modification
	Additional Modification
	Policies Maps
	Sustainability Appraisal Reports
	HEDNA
	Other new documents and evidence

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MM9

3. Please provide comments below, being as precise as possible. Comments can support, as well as object to the MM concerned with reference to the new documentary evidence listed on our website – www.nwleics.gov.uk/localplanmysay. (Expand the box if needed)

Policy S1 Policy S1 – Future housing and economic development needs

We welcome the District Council's proposal to commence a review of the Local Plan by the end of January 2018 or within 3 months of the adoption of the Local Plan. This will ensure that future major planning applications are determined in line with the provisions of a development plan that is 'current'.

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MM10

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Policy S2 Policy S2 – Settlement Hierarchy

In the case of Principal Towns and Key Service Centers, accessibility by **public** transport has been replaced by **sustainable** transport. Neither 'public transport' nor 'sustainable transport' are included in the glossary, though the 'travel plans' entry indicates that the objective is to reduce single occupancy car journeys.

We support this amendment on the understanding that 'sustainable transport' would embrace a range of options suitable for the elderly, infirm, disabled and those carrying shopping, such as taxis, shared use of cars, community mini-buses and complimentary supermarket bus services.

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Policy S3 Policy S3: Countryside

Within the uses listed as being permitted within the countryside (policy S3) the Willesley Environment Protection Association does not support the addition of (s) '**Employment land in accordance with the provisions of Policy Ec2**'.

On the face of it, the insertion of use (s) and cross reference to Ec2 (2) is of concern, as it raises the question of how effective Policy S3 will be in preventing speculative proposals for development outside the defined 'limits for development'. This is the more so because the reference to (the countryside's) "intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all" has now been deleted from Policy S3.

The justification for this additional use appears to be to cover instances of 'suitable brownfield land outside defined settlement limits'. If this is correct, it needs to be confirmed and made much clearer. If this justification is made explicit, then NPPF countryside policies and S3 criteria i) to vi) might be regarded as being sufficient to deter speculative ventures.

The criteria stated in Ec2 (2) on accessibility, good access to strategic highway network and not detrimental to the amenities of nearby residential properties or the wider environment are inadequate, in our view. Areas of open countryside surrounding Ashby would be vulnerable to development as employment land alongside key strategic routes like the A42 and A511 Ashby By Pass. For One example of this vulnerability is the land between the A42 and Measham Road, adjacent to A42 junction 12, the Willesley Park interchange. This length of Measham Road and the adjacent woodland and residential properties set in large landscaped plots, constitutes the most attractive and environmentally rich main approach road to the town. Should such development be allowed to proceed, there would then be pressure at a later date to allow development of the remainder of open land for further industrial and or housing development northwards, right through to Packington Nook Lane or even Lower Packington Road, The character and appearance of the countryside on this south-west side of Ashby, constituting this land, known as 'Packington Nook', and the adjacent Willesley land to the west of Measham Road, is of high quality in the local context and within the District overall. Developers would exploit this addition (s) '**Employment land in accordance with the provisions of Policy Ec2**' to the full.

This amendment does not offer adequate protection for any of the countryside surrounding the town. The town is already having very significant areas of countryside allocated for housing and employment. The potential for additional allocations outside the limits to development is unacceptable.

This amendment is all the more concerning because the Publication Local Plan failed to designate and protect within a Policy, 'Local Green Spaces', leaving this to Town and Parish Councils, within a Neighbourhood Plan. No such plans have yet been adopted, and in the vast majority of the District it would appear that there is little likelihood of them being produced due to lack of expertise and resources at the Parish level.

Also, because the Publication Local Plan also fails to identify and protect within a Policy those areas which are not classified as 'Local Green Spaces', but are nevertheless areas of open countryside of the highest value in terms of environmental value and tranquility, prized for their recreational and amenity value and meeting the needs of local people and visitors, in terms of their enjoyment, health and wellbeing.

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MM25

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Policy H3 Policy H3 Housing provision: new allocations

We support the amended criteria H3a iii), v) and viii) as a means of integrating large scale new development within Ashby and acknowledge the case for securing a coordinated provision of infrastructure for both housing and employment land, most notably via the access off the A511. However, the increase in the number of dwellings allocated for Ashby de la Zouch from 1,750 to 2,050 is not supported.

The Main Modifications reduces the number of dwellings required in the District by 780. Despite this reduction it is still proposed to allocate an additional 300 dwellings in Ashby de la Zouch. The Willesley Environment Protection Association (WEPA) does not support this additional allocation as it is not required to meet the HEDNA. While understanding that Money Hill may well eventually be developed fully, it seems inappropriate to show it all as allocated for housing up to 2031. One would normally expect a Plan to allocate only what could reasonably be expected to be delivered within the period that it covers.

WEPA supports the Ashby Town Council's opinion that owing to constraints created by the River Mease and the scale of the planned development of the 2050 dwellings allocated at Money Hill, 675 will not be built until after 2031. Therefore these additional 300 dwellings are not required and will not affect development during the plan period so should not be included. Any increase above this level will be exploited by developers to build more dwellings in Ashby where greater sales and profit levels can be achieved compared to other parts of the District.

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MM28

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Paragraph 7.22 (now paragraph 7.23)

While former paragraph 7.22 (now 7.23) has been amended to update the information provided, its content and significance is not readily appreciated by a lay audience. (One misinterpretation was that it was unduly 'generous' to developers and might lead to them dictating provision and exceeding Ashby's needs.)

Neither the '5 year supply of housing land' or the concept of a 'buffer', as part of it, appear in the Glossary. The proposed Monitoring Framework confirms that the '5 year supply' is an aid to monitoring progress in relation to Policies S1, H1, H2 and H3. However, it is not clear if or how a fluctuating 5 year supply figure relates to the Housing Trajectory in Appendix 2

As the "5 year supply" is subject to change over time, it might be helpful to include both a cross reference to the Monitoring Framework in Appendix 5 and a brief comment on how the 'current' range of 'between 6.34 and 7.24 years' (to Oct 2021) might be viewed at the start of the Local Plan's 15 year 'life'. Is it, for example, a healthy or desirable situation capable of being maintained or too low or too high to sustain?

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MM40

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Policy Ec2 Policy EC2 - New Employment Sites

The following modification is not supported for the same reasons as given in respect of MM12 – Policy S3: Countryside: concerning the potential development of additional employment land, over and above that required in the Local Plan and outside ‘limits for development’.

Specifically, we do support the amendments at Ec2 (1) (c), (e) and (h) which relate to the Money Hill area. Our concern is that Ec2 (2) raises the prospect of new sites being proposed across the District on grounds that are not explicit. The justification for this part of the policy is “to establish criteria for considering proposals for employment land not specifically allowed for in the plan”.

Part 2 does at least require “evidence (that) indicates an immediate need or demand for additional employment land in North West Leicestershire” (as a whole). This infers that a justifiable case must be made for a sustainable proposal. Post Brexit, this might well cover inward investment and the expansion or relocation of key existing businesses that are of regional or national importance. Such clarification could begin to allay our concern and give the wording of Ec2 (2) a sharper edge in providing a degree of flexibility to the Council, such that it is able to **“consider favourably proposals that meet the identified need in appropriate locations”**.