

NWLeicestershire Local Plan Position Statement

A summary of unanswered concerns raised in our Publication Stage Representation numbered 113.

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On behalf of Cliftonthorpe, Cliftonthorpe Meadows, Templar Road, and Ivanhoe Fields Estates residents

Matter 1 Legal Compliance

The NWLDC Local Plan process falls well short of best practices elsewhere by failing to give due respect to the emerging Ashby de la Zouch Neighbourhood Plan. The public consultation phase in the town consisted of just two basic 2 hour long board displays, the first in Tesco and the second in a secluded street location.

We stress the need for a full impact assessment before any allocations on the scale proposed at Money Hill are made and for the role that can be played by the emerging Ashby de la Zouch Neighbourhood Plan to be fully accepted and recognised.

Matter 2 Vision and Spatial Strategy

To totally concentrate development allocations H3 and Ec2 in a single major growth zone at Money Hill Ashby de la Zouch, with its relatively high house prices and development returns, is an unsound strategy for the following reasons.

The flawed and inconclusive Sustainability Appraisal examined only four extreme spatial strategy options. It gave no consideration to sensitively balanced alternatives which align development and investment to meet identified local needs throughout the district.

The Sustainability Appraisal lacks an adequate analysis of the impact of this major development on the local infrastructure and existing community and facilities in Ashby.

The strategy runs counter to basic plan Objective 2, balanced housing and employment growth, by exacerbating the current imbalance between housing growth in Ashby and employment growth elsewhere.

The highly skewed distribution of development would further undermine Objective 6, the regeneration and sustainability of Coalville and former mining communities typically less attractive to developers, and seriously widen the social divides within the District.

Proposed Modifications

Policy H3 Housing Distribution: New Allocations

Policy Ec2 Site ELAA:17 - Money Hill/Cliftonthorpe, Ashby

Full consideration of more sustainable options for spreading direct investment to match local needs and assist the consolidation of former mining communities, and in line with approved objectives 2) and 6) of the plan, should be undertaken as a priority.

Policy H3 would exacerbate the current imbalance between housing growth in Ashby and employment growth and housing need elsewhere and other more balanced options should be evaluated.

Matter 3 Housing Land Requirement

We believe the stated level of housing need is overestimated by at least 3000 units due to questionable data and arbitrary assumptions and policy S1 is therefore unsound.

Proposed Modifications

Policy S1 Total Amount of District-wide Housing development

A thorough reassessment of the housing need should be agreed with all neighbour housing authorities including those in Derbyshire and Nottinghamshire. We believe the housing need estimates should be reduced by at least 3000 units.

Policy H3 Housing Distribution: New Allocations

The need for the highly controversial greenfield housing allocation in policy H3 in the proposed Money Hill growth zone at Ashby de la Zouch is therefore unjustified and should be withdrawn from the plan.

Matter 5 Housing Land Supply

Promoting the entire Money Hill countryside as one large growth zone to accommodate 2050 dwellings housing about 5750 people and expand Ashby de la Zouch by 42% policy H3 is an unsound and unsustainable proposal.

It runs counter to basic plan Objective 2, of balanced housing and employment growth, and Objective 6, of regeneration, and gives inadequate consideration to other options for spreading the benefits of investment more evenly across the district. This will further exacerbate the current imbalance between new investment in Ashby and housing needs and employment growth elsewhere.

The proposed distribution of housing land allocations will lead to relatively high priced housing for the District, associated overspill inward migration from outside the District and consequential increases in the already high level of out-commuting from Ashby de la Zouch.

The plan also lacks an adequate analysis of the impact of this major development on the local infrastructure and existing community and facilities in Ashby. Such wholesale development is contrary to the principles of community open space in policy IF3 and the development of the Heart of the Forest in policy En3.

In particular it fails the test of sustainability by completely disregarding and compromising for all time future opportunities to develop the wider leisure and health benefit potential beyond the Hood Park Leisure Centre and Ivanhoe Community College and outwards through outstanding views across the whole raised northern landscape of the town.

Proposed Modifications

Policy H3 Housing Distribution: New Allocations

The large and controversial H3 housing allocation at Ashby de la Zouch is unsound and should be withdrawn from the plan or dramatically reduced in scale.

A more in depth analysis of opportunities to develop derelict and brownfield sites across the district, and particularly in the former mining areas, should be undertaken.

A thorough impact assessment and Masterplan should be developed with the local community in conjunction with the emerging Ashby de la Zouch Neighbourhood Plan in the event of the allocation in policy H3 being retained.

Matter 6 Employment Land Need

We believe that the level of employment land need in policy S1 is based on questionable and arbitrary assumptions which render the policy unsound. There is already sufficient allocated land to meet the basic employment need in DLPlan para 8.21, particularly when the approved Roxhill Strategic Rail Freight Interchange is taken into account.

No alternative evaluation justifying the need to direct further local employment land at Ashby de la Zouch has been produced. The town is not the most favoured industrial employment area in the district as illustrated by the slow take-up of the existing allocations on the Ashby Park and Ivanhoe business parks. Ashby has a low unemployment rate of just 0.9%, well below the national level and that of other local areas which could benefit more from this investment.

Proposed Modification

Policy S1 Total Amount of District-wide Employment Development

As there is already sufficient allocated land to meet the basic employment need in DLPlan para 8.21 we propose that the allocation in policy Ec2 on greenfield land at Money Hill Ashby is unjustified and should be completely withdrawn

Matter 6 Employment Land Supply

The employment allocation in Policy Ec2 at Money Hill comprises two small parcels of greenfield countryside outside existing limits to development.

As the many alternative opportunities to bring derelict and brownfield land and other less environmentally disruptive sites back into productive use have been very poorly recorded and researched its choice is without adequate justification.

The western greenfield site is directly linked to the south and east by 150 newly constructed houses in a development restricted to former brownfield land. **This proximity to newly developed housing, together with its limited size and access difficulties, make it relatively unsuitable for modern day general industrial and warehousing use.**

To sacrifice the larger nearby ARLA industrial site on Smisby Road for housing in policy H3a and at the same time relocate industrial and warehousing uses to greenfield land adjacent to newly arrived residents is environmentally unsound, exhibits a total lack of empathy and is morally unjust.

Given the key plan objectives 2 and 6 for deliverable balanced growth and continued regeneration of the former mining communities and NPPF guidance that ‘plans should improve the places in which people live their lives’ this allocation is economically, environmentally and morally unsound.

It fails the test of sustainability by compromising forever the unique opportunity to develop countryside friendly leisure and health uses northwards from Ashby de la Zouch alongside the key existing footpath links.

Proposed Modifications

Policy Ec2 Site ELAA:17 - Money Hill West//Cliftonthorpe, Ashby

The employment allocation of this prominent greenfield countryside site, which is directly adjacent to 150 newly completed dwellings, should be withdrawn.

Instead the plan should highlight the unique potential for developing footpath and associated recreational links northwards from Ashby to the outstanding National Forest countryside beyond the A511 in line with key plan objectives 11 and 12.

In the event of the need for employment allocations being justified a more in depth analysis of opportunities to develop derelict and brownfield sites across the district should be undertaken.

If it is essential to make a further employment land allocation in this locality the nearby modern Ivanhoe Business Park has good access and infrastructure, backs on to existing industry and is easily extendable to the west. Alternatively the western site should be amalgamated with that proposed on the east of Money Hill directly adjacent to existing industrial development.