

**MM12 Policy S3(s) Countryside**

**MM40 Employment Policy Ec2 (2) Comments**

**No justification is given for this late addition to Policy S3 which supports the full range of general Employment uses across countryside outside the limits to development and which conflicts with the whole philosophy of the National Forest area designation.**

**This is not yet a positively prepared change based on objectively assessed development need and opportunity and is therefore unsound.** Lack of detailed evaluation identifying those broad areas which should be protected will lead to the dangerous and unnecessary exposure of the whole countryside to speculative development at a late stage and without proper scrutiny.

**Adding such an extremely loose and poorly defined proposal opens up a Pandora's Box leading to all manner of spurious and opportunistic development proposals throughout the district and particularly areas surrounding the A42.**

**This would seriously jeopardise the successful development of the National Forest areas and the associated health, leisure and tourism benefits.**

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**MM40 Employment Policy Ec2 (2) Proposed modifications**

**In the absence of clearly identified demand, the high level of existing out-commuting, and the extremely low unemployment levels in areas likely to be affected the proposal is unsound. It should be withdrawn and subject to a future study of the issues that have been raised on this matter.**

## MM 25 Housing Policy H3 - Comments

This modification still concentrates the vast bulk of new district housing allocations in one major growth zone covering the extensive countryside fringe area of Money Hill. **It has added without justification the active Equestrian Centre and pre-empts its own Masterplan by pre-determining an increased development of 2050 dwellings housing 4500 people and expanding Ashby de la Zouch by 36%.**

**The policy remains unjustified, premature and unsound at this point in time because:**

- **the allocation has remained unchanged despite the objectively assessed housing requirement being revised substantially downward by 780 to 9600 units and is therefore arbitrary and not related to need,**
- **the prior specification of precise housing numbers pre-empts the very concept of a considered multi-use Masterplan,**
- **it is neither sustainable nor realistic as the bulk of local employment opportunities are located in the north and east fringes of the district where Kegworth, Coalville Urban area and larger adjacent centres in bordering districts would provide more immediate and sustainable housing locations,**
- **it is unjustified as it runs counter to basic plan Objective 2, of balanced housing and employment growth, and Objective 6, of regeneration, so exacerbating the current imbalance between housing growth in Ashby and employment growth elsewhere,**
- **it would result needlessly in higher priced housing than possible in the former mining communities traditionally less profitable for developers, undermine efforts for investment there, perpetuate the social divide and jeopardise the sustainability of our communities as a whole,**
- **it would lead to a failed mismatch of housing types/prices relative to district residential need and demand, increased inward migration of wealthier families from along the A/M42, and result in further environmentally unfriendly and unsustainable out-commuting from Ashby.**

**The simultaneous allocation of the similar extensive urban fringe Area of Separation in Policy En5 area adjacent to Coalville pre-empts the provision of more convenient and less costly housing more consistent with local needs.** The arguments put forward in favour of giving privileged protection apply equally and possibly more strongly to Money Hill, and the policy is without a full analysis of the value of partial development uses. It dismisses proven demand from developers, goes against the spirit of sustainability and therefore remains unjustified and unsound.

## MM25 Housing Policy H3: Proposed modifications

**To ensure soundness and compliance, and given the major scale and impact of the proposal on Ashby, the welcomed 'strategic mixed use allocation' Masterplan should be:**

- prepared alongside and in conjunction with the emerging Ashby de la Zouch Neighbourhood Plan,
- include a requirement for **effective consultation with the local communities affected,**
- **include a full impact assessment on Ashby communities** before any further precise allocations are made.

**The over supply of 780 units should be deducted from the Policy H3 allocation reducing it to 1245 dwellings. A more appropriate strategy would then split between Money Hill, Ashby de la Zouch and the Area of Separation at Coalville Urban Area on the basis of sensitively prepared multi-use Masterplans and impact analyses for the two locations.**

**MM37 Table 5 Employment Land Provision: Comments**

**The allocation of employment land E1 in Policy Ec2 on the small parcel of greenfield countryside outside existing limits to development in Policy Ec2 at Smisby Road, Money Hill, Ashby de la Zouch is unjustified for the following reasons.**

**The need for an extra employment allocation depends on the validity of the loss of 45 hectares of industrial land to housing in Table 5.** If this arbitrary guestimate is reduced by just one-third, or an offsetting allowance made for smaller and unidentified brownfield sites coming forward over the plan period, no new allocation would be required under policy Ec2.

The requirement for additional districtwide local employment allocations also rests on the unclear reduction in existing commitment figures in Table 5. What has happened to these commitments?

**There is no fully comprehensive up to date register of alternative derelict and brownfield land opportunities** for ensuring less environmentally disruptive sites are brought back into productive use.

#### **MM40 Employment Policy Ec2(1)- Money Hill West, Ashby: Comments**

**This prior allocation pre-empts the very concept of the required multi-use Masterplan** and fails the test of sustainability by unnecessarily splitting the industrial allocation on Money Hill and duplicating infrastructure needs.

**It compromises forever, and without any considered analysis, the unique opportunity to exploit the leisure and health potential of the existing footpath link northwards from Ashby de la Zouch.** It negates the unique opportunities for user friendly links northwards across the A511 to the outstanding countryside areas of the Pistern Hills, Staunton Harold and Calke Abbey and the wider and developing National Forest countryside network and heritage.

The 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 employment 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.

**There is no clear analysis showing a lack of sites in and around Ashby de la Zouch.** 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, and many new employment opportunities are promised at the Strategic Rail Freight Interchange.

**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.

#### **MM40 Employment Policy Ec2(1)- Money Hill West, Ashby: Proposed Modifications**

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

**The allocation if justified should subsequently be split between the area adjacent to the eastern Ec2(2) employment allocation on Money Hill and the Area of Separation at Coalville Urban Area** on the basis of sensitively prepared multi-use Masterplans and impact analyses for the two locations.

**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.

#### **MM40 Employment Policy Ec2(2)**

See comments on MM12 Policy S(s) Countryside.