

TABLE D - ECONOMIC

Policy Ec1 – Employment provisions: permissions

Question 17 Do you agree with our suggested approach in respect of employment sites with planning permission? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes			Lisa Marron	Resident
This is crazy, given that two larger former employment sites in ashby have been demolished and housing has been built on it!!!!	There is a requirement for the Local Plan to meet the districts employment needs.		Mr s Whitehouse	Personal
Yes	Noted.		Nigel Garnham	Packington Nook Residents Association
Yes			Mark Chadbourn	Emerald Eye Ltd
Yes			Alison Wright	Heather Parish Council
<p>Page 54 - Item 7.5</p> <p>This is supposed to be a plan? How on earth can a 'key feature' of a plan be a concept? A plan is a highway or blueprint to achieving goals.</p> <p>The plan should identify proposed steps to producing an East Midlands Enterprise Gateway. It should detail the necessary resources needed and steps to achieve this goal with in a predetermined time frame.</p> <p>The largest area of employment growth is around the East Midlands Airport and Castle Donington. It will be even larger with the potential of the SRFI. It is also a fact that huge numbers of people travel into this area on a daily basis. This not sustainability, as such a considerable portion of the housing growth should be transferred from SE Coalville to this area.</p> <p>This would greatly increase the viability and sustainability of NWL. Out of the box ideas such as a new settlement should not be discounted. This area also has amazing road infrastructure.</p> <p>Item 7.6</p> <p>The growth area of the A511 corridor mentioned, amazingly doesn't have any plan for highway improvements as apparently no funding is available. Yet LCC are interested in spending several millions of public money on a village cross roads rather than on the A511.</p>	<p>The reference to East Midlands Enterprise Gateway as being a 'concept' is slightly misleading as in reality it eresents a concentrartion of major, real life economic opporrntunities in and around the M1/East Midlands Airport. As part of delivering the East Midlands Enterprise Gateway the District Council is working with a range of partners to deliver a co-ordinated approach to infrastructure and other common issues in this area.</p> <p>A large amount of growth has already taken place in the north of the district in recent years and a further 895 dwellings have planning permission within Castle Donington. There are significant physical constraints that will not allow any further development around Castle Donington. It is important for the local plan to balance the level of growth across the district rather than concentrate it within one area of the district and saturate the market.</p> <p>The idea of a new settlement to be allocated within the new draft Local Plan has been considered and is discussed in greater detail as part of both the supporting Viability Assessment and Sustainability Appraisal. However the option for a new settlement has not been promoted by the development industry and is therefore not a realistic option.</p> <p>The A511 junction improvements are supported as part of the draft Local Plan policy IF4 which states where appropriate new development will be expected to contribute towards improvements. The District Council are continuing to work with Leicestershire County Council and Highways England to develop a strategy.</p> <p>The District Councils Local Growth Plan can be viewed at http://www.nwleics.gov.uk/pages/evidence_base_documents</p>		Steve Palmer	NA

<p>Currently no land has been identified in the plan for industrial use off the A511 corridor. The potential disruption for years to come to A 511 traffic in particular by the proposed HS2 high speed rail line will cut the district in two. Traffic flow could be hampered for decades. Whilst it's not firm yet a wise planner will have factored this into his plan.</p> <p>Page 55 -Item 7.7</p> <p>Perhaps the Council should make the Local Growth Plan available to the public?</p> <p>Item 7.9</p> <p>This protection of employment areas goes directly against the NPPF, page 17 item 22.</p>				
<p>Building houses on industrial land should be avoided. Former industrial land should be re-developed as areas for employment.</p>	<p>Noted and agree draft Local Plan EC3 seeks to safeguard existing employment areas.</p>		<p>Samantha Lockwood</p>	<p>Long Whatton and Diseworth Parish Council</p>
<p>I don't think Ashby will attract companies as well as Castle Donington because the A42 is not capable of taking more heavy traffic</p>	<p>Noted. Ashby and Castle Donington are both defined as ' Key Service Centres' as they play an important providing services and facilities to the surrounding area and are accessible by some public transport.</p>		<p>Mr Robert Harlow</p>	<p>Harlow Bros Ltd</p>
<p>No</p>	<p>Noted.</p>		<p>None</p>	<p>none</p>
<p>Yes</p>	<p>Noted.</p>		<p>David Harris</p>	<p>Pyroprotect Ltd</p>
<p>Yes</p>	<p>Noted.</p>		<p>Andrew Stone</p>	<p>NA</p>
<p>No</p>	<p>Noted.</p>		<p>Trevor Davis</p>	<p>None</p>
<p>Yes</p>	<p>Noted.</p>		<p>Measham Parish Council</p>	<p>Measham Parish Council</p>
<p>Yes</p>	<p>Noted.</p>		<p>Edward Hines</p>	<p>N/A</p>
<p>Yes</p>	<p>Noted.</p>		<p>David Bigby</p>	<p>Private individual</p>
<p>see comments in respected of 'lapsed' residential permissions.</p>	<p>Noted.</p>		<p>Lance Wiggins</p>	<p>Landmark Planning</p>
<p>Yes</p>	<p>Noted.</p>		<p>Mr. j Lewis</p>	<p>1950</p>

<p>The various figures quoted for the loss of employment land to housing doesn't take into account that more people are working, or even running businesses from home and are becoming self-employed and mobile.</p>	<p>Noted, the Local Plan is required to provide for enough employment land to meet the districts requirements over the plan period. Evidence suggests that the district.</p> <p>The Planning Practice Guidance (Housing and Economic Development Needs Assessment) advises that in considering future economic needs consideration should be given to "The recent pattern of employment land supply and loss to other uses".</p> <p>In considering the amount of future employment land needed it is , therefore,</p> <p>appropriate to have regard to the likelihood that over the plan period some land currently used for employment uses will be lost to other uses, particularly housing.</p> <p>The effect of this would be to reduce the number of jobs available in the district and so we need to ensure that the amount of new provision is sufficient to compensate for such losses</p>		Steve Johnson	YYYY
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Tim Abbott	Householder
With the exceptions outlined already in previous questions.	Noted.		Jane Tebbatt	Quarrying
Yes	Noted.		Heather Parish Council	Heather Parish Council
Yes	Noted.		JON WALTERS	LPT

<p>Identifying employment sites with extant planning permission as part of the overall provision is considered acceptable, subject to there being sufficient impetus in policy to renew such permissions should they lapse. The Council should be aware that, as they form part of the employment land position, the lapsing and non-renewal of extant permissions will have wide and significant implications for the overall employment land position. It must be a priority for the Council therefore to ensure that permissions are started and, where a renewal of permission is required, it focusses on supporting the renewal of that permission. The presence of Policy S1 within the plan, as well as the principle in favour of sustainable development being at the core of the NPPF will likely ease the process of renewing permission and this, alongside the presence of Policy Ec1 will likely be sufficient in enabling the renewal of permissions should this be required. In the event that planning permission should lapse, new permissions should be granted on the basis of the most recent evidence available, where feasible and reasonable keeping in mind the principle in favour of sustainable development. The balance between viability and sustainable planning should be met, despite potential added pressure for the Council to renew planning permissions as a result of their tie to the employment land provision position. Policy Ec1 appears to provide for this balance appropriately.</p>	<p>Noted.</p>		<p>Andrew Johnson</p>	<p>Erewash Borough Council</p>
<p>The approach to land requirements needs further refinement. The figures used to identify commitments against the 96ha requirement are gross figures, and so are not representative of the actual delivery of employment development (net) land being delivered – as an example, the Beveridge Lane site is shown to account for around 36ha of the 96ha – but around 11ha of that 36ha is required to be in national forest woodland and other green infrastructure, and will never deliver ‘employment’ uses.</p> <p>We would therefore strongly suggest the Council re-examine the calculated supply of employment land as at present, if based on net figures the Council’s land supply position would be quite different, with under-delivery likely against the stated target of 96 ha.</p>	<p>The monitoring of sites and the figures referred to in the plan are net, it is agreed the more work needs to be carried out to ensure that sites are all measured in the same way. It is proposed to amend the supporting text to state "The employment land requirement is net of land occupied by major peripheral structural landscaping and main distributor roads. Other on-site infrastructure, such as access roads, ancillary landscaping, car parking and buildings are all included in the net figure".</p>	<p>Amend policy to make it clear that the employment land figure is a net figure and insert the following into the supporting text "The employment land requirement is net of land occupied by major peripheral structural landscaping and main distributor roads. Other on-site infrastructure, such as access roads, ancillary landscaping, car parking and buildings are all included in the net figure".</p>	<p>Steve Harley</p>	<p>Oxalis Planning on behalf of Cordovan Holdings Ltd</p>

<p>The approach to land requirements needs further refinement. The figures used to identify commitments against the 96ha requirement are gross figures, and so are not representative of the actual delivery of employment development (net) land being delivered. Using gross site areas can often be quite misleading as policy initiatives such as the National Forest planting and other green infrastructure or open space requirements can significantly reduce the net developable area of large sites. Using gross site areas means land which will never accommodate employment uses is included in the indicative land supply.</p> <p>We would therefore strongly suggest the Council re-examine the calculated supply of employment land. At present, if net land/site areas are used the Council, the indications are that additional sites may be required over the plan period to deliver against the stated employment land target.</p>	<p>The monitoring of the plan is done using net figures, and the figures for employment land within the plan are net, it is agreed that the text in the local plan needs to be amended to reflect this.</p>		Steve Harley	Oxalis Planning on behalf of the Trustees of Curzon Coaker Settlement
<p>There is a requirement to allocate land for employment to the order of 13.26 hectares. Policy EC1 proposes that this is allocated at Ashby; Bardon and Ellistown. Again there is no acknowledgement of the Swadlincote Woodville urban area or the proposed strategic employment zone proposed by South Derbyshire south of Swadlincote in their allocation Ref E1C.</p> <p>Additional consideration needs to be given to the allocation of additional employment land adjoining South Derbyshire as shown on the accompanying masterplans. These proposals make sense of the existing and proposed land uses in this sustainable location. There are already existing business enterprises on part of this land north of Occupation Lane</p> <p>and this should be confirmed through additional allocations as shown on the plan. The existing employment areas comprise around 2 hectares and an additional 3 hectares should be allocated. [shown blue on the attached master plan]</p> <p>On the basis of the attached masterplan the open countryside designation should be removed from my clients land north of Occupation Lane and an employment allocation should be made.</p>	<p>The districts employment land requirements have been met for the plan period, in accordance with the settlement hierarchy.</p>		Tom Beavin	jvh planning

<p>(a) It's not a simple yes or no answer. The Labour Group recognise that land needs to be made available for new employment – but there has been a failure to engage with communities (large and small) in discussions where the best location is for new employment land.</p> <p>(b) There should a 'brownfield first' policy</p> <p>(c) The forthcoming Ashby de la Zouch Neighbourhood Plan will test this Council's resolve to consider proposals put forward by that community instead of developers.</p> <p>(d) Public Inquiries on applications on Money Hill will reflect the outcome of this question.</p> <p>(e) Development deliverability will reflect the outcome of this question</p> <p>(f) We question why this council has not taken up Government's position to build a new freestanding Garden Village with employment provision? This option needs to be seriously considered on land that will not overwhelm existing larger settlements.</p>	<p>The issues are dealt with elsewhere within the Local Plan.</p>		<p>Sue McKendrick</p>	<p>Labour Group leader</p>
<p>The largest area of employment growth is around the East Midlands Airport and Castle Donington. It will be even larger with the potential of the Strategic Rail Freight Interchange (SRFI). It is also a fact that huge numbers of people travel into this area on a daily basis and as such a considerable portion of the housing growth should be transferred from SE Coalville to this area.</p>	<p>It is important to balance economic and housing growth. Castle Donington has received a large amount of growth since the beginning of the plan period and currently has permission for 895 dwellings this is reflected by its place in the settlement hierarchy. There are currently no further suitable sites to the north of the district to allocate further housing sites, without expanding the existing villages, as there are physical constraints around Castle Donington and Kegworth which would restrict development.</p>		<p>Simon Weaver</p>	<p>Hugglescote and Donington le Heath Parish Council</p>
<p>No as NWLDC has presumed that the SFRI is already approved in terms of economic growth however at this stage it has not been approved and therefore NWLDC should create a second policy if the SFRI does not go ahead.</p>	<p>Noted. The permission has now been granted.</p>		<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

Policy Ec2- Employment provision: new allocations

<p>Question 18</p> <p>Do you agree with our proposed employment allocations? If not what change would you suggest? - Please provide further comments;</p>	<p>NWL Response</p>	<p>Any change required?</p>	<p>Name</p>	<p>Business or organisation name;</p>
<p>yes</p>	<p>Noted</p>		<p>Lisa Marron</p>	<p>Resident</p>
<p>Again, we need to wait until consultation is completed for the Ashby neighbourhood plan is complete. Allowing housing to be built on two perfectly good employment sites is ridiculous.</p>	<p>Noted. The draft Local Plan on page 119 sets out its relationship with neighbourhood plans. Any neighbourhood plan needs to be in general conformity with the strategic policies contained in the Local Plan at Appendix 4. Ashby Town Council have been consulted as part of the Local Plan preparation process. The District Council have also had opportunity to make representations on the Ashby Neighbourhood Plan. It is important to note that the Ashby Neighbourhood Plan will need to support the strategic policies of the Local Plan.</p>		<p>Mr s Whitehouse</p>	<p>Personal</p>
<p>Again the allocations in Ashby should be dependent on major improvements to public transport connections, not just cycle and walking links. The proposed policy does not take into account sufficiently the LCC Policy to reduce car usage.</p> <p>East Midland Airport development again should be linked to public transport provision from the whole area.</p> <p>Brownfield sites should also be encouraged for new employment provision. The existing process of utilising former industrial sites for housing, which then pushes new employment sites onto greenfield does not protect the countryside.</p>	<p>The Local Plan is a landuse plan and can only encourage people to walk and to use sustainable modes of transport, the Council has worked with partners to recently introduce a bus service between East Midlands Airport and Coalville. The District Council will continue to work with the County Council on the provision of new infrastructure requirements as part of new development across the district.</p> <p>Brownfield land is the preferred option in accordance with the National Planning Policy Framework for all new development; however these sites tend not to be as viable for new development and brownfield sites.</p>		<p>Nigel Garnham</p>	<p>Packington Nook Residents Association</p>
<p>No development at the Money Hill site. It is an historic and green gateway to the town.</p>	<p>Noted. There is the need for additional employment land to ensure continued economic growth. All employment sites will be subject to sustainability appraisal which will consider the impact of further development on heritage assets. Historic England has also been consulted on the preparation of the Local Plan. The policy also requires future proposals to take account of the historic setting.</p>		<p>Mark Chadbourn</p>	<p>Emerald Eye Ltd</p>
<p>But also consider all brown field sites in the area</p> <p>A huge amount of green field has been lost along Beveridge Lane Ellistown</p>	<p>Noted. Brownfield sites are considered as part of the site selection process in identifying employment sites as part of the draft Local Plan. It is necessary to demonstrate that proposals included in the Local Plan are deliverable. In this respect the viability of the redevelopment of brownfield sites for employment tends to be an issue which affects deliverability</p>		<p>Alison Wright</p>	<p>Heather Parish Council</p>

<p>The authority should conduct an investigation in to where industrial land is more likely to attract an owner or tenant and produce employment. Businesses will not be dictated to regarding location, large incentives can help but no incentives are mentioned in the plan. Surely the Lounge site is likely to have high speed trains running through the centre of it? Long term investment in that site would be extremely risky.</p> <p>Page 57 - Item 7.21</p> <p>This beggar's belief that an area where no suitable sites for employment provision (Coalville Urban area) should be the place selected for the largest increases in housing. Not a sustainable choice is it? I hope this is pointed out to the inspectorate who will review the finished document.</p> <p>To be sustainable housing must be near to employment areas and areas of employment growth to provide jobs for all these extra people.</p> <p>Is it wise or even sensible to consider the area with relatively the fewest jobs as the location for the most new housing?</p> <p>Page 58</p> <p>Policy Ec2</p> <p>Money Hill, Ashby. Use of this land for industry is a huge mistake. The growth direction of Ashby will result in an island of industrial buildings, traffic and noise. The best use of this highly convenient site is for housing. Industrial development is best on the fringes of the town.</p>	<p>The District Council carried out a call for sites as part of preparing the Employment Land Availability Assessment (ELAA) so as to try and identify a pool of potential sites. As a result of preparing the ELAA and allowing for the fact that some sites have gained planning permission (e.g. two sites at Bardon) there are no available sites in Coalville, more information is available in the supporting background paper on the the site selection process. The site to the north of Ashby is proposed to be mixed use 16ha for employment use and 1750 new dwellings.</p>		Steve Palmer	NA
<p>I have a number of concerns with regards to Policy Ec2 (Q18) in relation to the allocation of Proposed Employment sites, in particular Site ELAA:17. Firstly I would like to note that the plan used to propose said sites are out of date and do not indicate the Ivanhoe Fields residential site to the south of the most western allocated site along the Smisby Road. This misconstrues the premise of employment use within this location. It can be understood to be an acceptable location to the eastern site by the Tesco superstore as this site has direct links with existing employment sites. With regards to the western site, with the new Ivanhoe Fields site, which should be included on the site plan, employment use</p>	<p>In identifying employment sites, the sites within the Employment Land Availability Assessment 2014 have been assessed against the settlement hierarchy. There are currently no available, achievable and deliverable sites within the Coalville Urban Area. There are a number of sites within the northern parishes, however it is considered that in the view of the fact that there is already significant amount of employment in this area along with the recently approved Strategic Rail Freight Interchange additional employment would represent an imbalance with housing provision in the locality.</p> <p>In terms of Ashby de la Zouch two potential sites are included in the ELAA south of Ashby and north of Ashby. It is</p>		Kristian Lawrence	N/A

<p>should not be proposed here. With the Ivanhoe Fields estate this gives a strong premise for residential use to this side of the site. Understandably there is employment use to the west of the Smisby Road, but there is a clearly defined separation between employment and residential along the Smisby Road. This is also strengthened with the recent demolition of Arla Foods.</p> <p>It seems that there hasn't been enough research completed into the site allocation, which can only be strengthened by the lack of knowledge of the current Ivanhoe Fields site and the distinct divide between residential and employment along Smisby Road. This lack of knowledge is wholly disconcerting taking into account the government policies in relation to greenfield and brownfield developments, of which within the borough there are a large number of brownfield sites that could be enhanced and re-used rather than this blaze approach of utilising greenfield sites. There are a number other more suitable sites which have easier and more direct links to the M1 motorway and have a strong and visible employment grain, for example along the A511 opposite Stephenson College, Coalville, or the current Bardon Hill Industrial Estate.</p> <p>In policy terms taking into account the NPPF At its heart, the NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development, stating that the policies contained within, taken as a whole, constitute the Government's view of what sustainable development means in practice. The proposal for employment use along the Smisby Road, the western of the two sites, which would be classed as development in the greenbelt is wholly against the Governments approach to Sustainable Development. As previously discussed there are a large number of brownfield sites within the borough that could be utilised for sustainable development.</p> <p>The NPPF urges authorities to significantly boost the supply of housing to meet the full, objectively assessed need for market and affordable housing. Surely with the strong precedent of development to the eastern side of the Smisby Road as residential, this would be a more suitable</p>	<p>considered that land to the north of Ashby would be the most appropriate site.</p> <p>The proposed allocation reflects the proposals set out in a Master Plan prepared by the site promoters. The precise layout and other details remain to be agreed with the promoters of the site. It should be noted that there is no Green Belt land within Leicestershire and the site is currently defined as open countryside in the existing local plan. There is not currently any brownfield sites that are available, achievable and deliverable to meet the districts employment land needs over the plan period.</p>			
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<p>allocation for the site, if any should be allocated to it.</p> <ul style="list-style-type: none"> At paras.11 - 16 the presumption in favour of sustainable development is confirmed. Para. 14 states that the presumption in favour of sustainable development is a golden thread running through the NPPF. Para. 17 advises that the planning system should not simply be about scrutiny, but about finding ways to enhance and improve the places in which people live their lives. This doesn't seem to strengthen the case for the proposed site allocation of employment, also as how can development within the greenbelt rather than brownfield sites be classed as a sustainable source of land use. Para. 123, states that planning policies and decisions should avoid noise from giving rise to significant (my emphasis) adverse impacts upon health and quality of life as a result of new development. By proposing further employment use within this area would cause a detrimental impact on the quality of life for local residents though traffic, noise, pollution etc. <p>With this in mind the development plan should take into account the NPPF guidance and look to review and revise its current stance on the ELAA:17 site allocation.</p>				
NO COMMENT	Noted.		Samantha Lockwood	Long Whatton and Diseworth Parish Council
Having disagreed with question 17 I don't think I can agree for the same reasons	Noted.		Mr Robert Harlow	Harlow Bros Ltd
Yes			David Harris	Pyrotect Ltd
<p>Site ELAA:17 - Money Hill/Cliftonthorpe, Ashby</p> <p>We strongly disagree with the employment allocation of this prominent greenfield countryside side which is directly adjacent to 150 newly completed dwellings. 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 plan objective 12.</p> <p>We are staggered by the insensitivity and lack of insight shown by the District council in proposing the Cliftonthorpe site for industrial and warehouse development when it is clear that there is no</p>	<p>The proposed allocation reflects the proposals set out in a Master Plan prepared by the site promoters. The precise layout and other details remain to be agreed with the promoters of the site.</p> <p>The policy also states that there will be the need to provide appropriate landscaping and other features so as to minimise the impact upon the adjoining housing development proposed with the provision of cycle and walking links to the adjoining housing. In terms of developing green infrastructure as part of new development this is covered by draft Local Plan IF1. It is proposed that the policy will be amended to ensure that the planning application will need to demonstrate how Green Infrastructure is incorporated into the site.</p>		Robert Yates	Cliftonthorpe Residents Management Company

<p>necessity and there are also many better brownfield options. These lie around Ashby but those at Coalville, adjacent to Coalville College on the A511 or Snibston for instance, and around the mining villages would better address the objectives of the plan. The district is a mixture of market towns, where the plan objectives of environmental protection and conservation are paramount and former mining settlements where the key objective 6 of the plan is to continue to promote regeneration.</p> <p>This difficult to access greenfield land is outside the limits of development. The site was a very late addition to the employment sites list and incorrectly evaluated using an out of date plan. Given the key plan objectives 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' we strongly oppose this allocation for the following reasons.</p> <p>1) No evaluation justifying the need to direct further local employment land at Ashby 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.</p> <p>2) This employment allocation at Money Hill comprises two small parcels of countryside outside limits to development. The western site at Cliftonthorpe has access difficulties and is unsuitable for modern day general industrial and warehousing use. It is a late addition to the plan and is not shown to have any particular merit in its own right at this point in time.</p> <p>3) The crudely annotated and seriously outdated plan and false description of the Cliftonthorpe site given in Background Paper 6- site ELAA:17 are totally misleading and the wording relates more to the housing allocation in policy H3. Indeed the description given comprises a crude hand drawn boundary which worryingly strays over existing housing and undermines confidence in the plan</p>	<p>It is acknowledged that the proposed site is outside of the currently adopted local plan limits to development, however the local plan expired in 2006 and therefore the limits to development are out of date and have been revised to accommodate growth to 2031 the end of the draft local plan period.</p> <p>Access to the site has been assessed by the Highways Authority which have raised no objection to the land allocation.</p> <p>Although it is acknowledged that the development of brownfield land over greenfield land is the preferred option, there is not currently enough available, achievable and deliverable brownfield sites to meet the districts employment land needs over the plan period.</p>			
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makers understanding. The policy states erroneously that access can be arranged in conjunction with the larger separate housing site. DLPlan para 7.24.

4) The analysis shows no awareness of the opportunities to develop the existing leisure potential of this land. There is no mention that the sensitive western site is divided by a brook with endangered great crested newts and surrounded by walkways on all sides. These are already used regularly by many ramblers, (dog) walkers and horse riders from the adjacent equestrian centre. It offers unique opportunities for improved and forested footpath and bridleway 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 network.

5) The western greenfield site is directly linked to the south and east by 150 newly constructed houses in a development restricted to brownfield land. As purchasers are still moving in this adjacent employment allocation for unconstrained industrial and warehousing uses shows little empathy or consideration particularly when it is proposed to also sacrifice the nearby ARLA industrial site on Smisby Road for housing in policy H3a. NPPF. Para. 17 advises that the planning system should not simply be about scrutiny, but about finding ways to enhance and improve the places in which people live their lives.

6) 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 extended. In addition unexamined but better located, more accessible and brownfield site options are available in Ashby between Nottingham Road and the A42 by the waste amenity or east of the A511 and A42 junction 13 and alongside the HS2 route whether it is finally approved or not.

7) The proposal is directly related to the landownings of the consortium lobbying for the comprehensive housing development at Money Hill dealt with under policy H3a. However that proposal is included in the plan solely to cater for

possible housing shortfalls in the distant areas of Coalville and possible employment growth around Castle Donington. It is therefore illogical to suggest that it is also necessary to sacrifice additional greenfield countryside to provide further employment for the same households.				
The Town Council supports the allocation of 16Ha of land for employment use, but would ask that the locations to be allocated are revisited – one rather than two sites would be preferable, and located with sympathy to existing and future housing developments.	The proposed allocation reflects the proposals set out in a Master Plan prepared by the site promoters. The precise layout and other details remain to be agreed with the promoters of the site.		Karen Edwards, Deputy Town Clerk	Ashby de la Zouch Town Council
yes			Andrew Stone	NA
<ul style="list-style-type: none"> As there is already sufficient allocated land to meet the basic employment need in DLPlan para 5.6 I propose that the allocation in policy Ec2 on greenfield land at Cliftonthorpe Money Hill Ashby be withdrawn. 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. I strongly disagree with the employment allocation of this prominent greenfield countryside side which is directly adjacent to 150 newly completed dwellings. Instead the plan for Money Hill should highlight the unique potential for developing footpath and associated recreational links northwards from Ashby to the outstanding National Forest countryside beyond the A511. 	<p>The Local Plan is required to meet the districts employment land needs for the plan period, the local plan is required to provide for 96ha. As with housing, we are not starting with a blank sheet of paper; a number of developments have taken place since 2011 and there are also a number of sites where planning permission has previously been granted for some form of employment development.</p> <p>In addition to the existing provision, we need to consider whether some land currently in use for employment purposes could be lost to other uses. It is not possible to predict with any great certainty as to how much existing employment land might be lost in the future. Based on past trends it is proposed to assume that 45 hectares of employment land will be lost to other uses. The effect of this allowance is that there is a small shortfall of 13.26 hectares of employment land. This shortfall therefore needs to be taken account of in the draft Local Plan through allocations.</p> <p>The Local Plan is a land use plan and can only encourage economic development and therefore not cannot control the level of unemployment.</p> <p>In identifying employment sites, the sites within the Employment Land Availability Assessment 2014 have been assessed against the settlement hierarchy. There are currently no available, achievable and deliverable sites within the Coalville Urban Area. There are a number of sites within the northern parishes, however it is considered that in the view of the fact that there is already significant amount of employment in this area along with the recently approved Strategic Rail Freight Interchange additional employment would represent an imbalance with housing provision in the locality.</p> <p>In terms of Ashby de la Zouch two potential sites are included in the ELAA south of Ashby and north of Ashby. It is</p>		Mrs J.S Chapple	NA

	<p>considered that land to the north of Ashby would be the most appropriate site.</p> <p>The area of employment land allocated to the north of Ashby de la Zouch as part of residential development is currently only indicative and is subject to change. The draft policy states that "the provision of appropriate landscaping and other features so as to minimise the impact upon the adjoining housing development proposed...."</p> <p>The policy also looks to provide cycle and walking links to the adjoining housing development. In terms of the provision of providing further cycle and walkways as part of new development these are covered by draft Local Plan IF1.</p>			
<p>As there is already sufficient allocated land to meet the basic employment need in DLPlan para 5.6 We propose that the allocation in policy Ec2 on greenfield land at Cliftonthorpe Money Hill Ashby be withdrawn.</p> <p>* 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.</p> <p>* We strongly disagree with the employment allocation of this prominent greenfield countryside side which is directly adjacent to 150 newly completed dwellings.</p> <p>* Instead the plan for Money Hill should highlight the unique potential for developing footpath and associated recreational links northwards from Ashby to the outstanding National Forest countryside beyond the A511.</p>	<p>The Local Plan is required to meet the districts employment land needs for the plan period, the local plan is required to provide for 96ha. As with housing, we are not starting with a blank sheet of paper; a number of developments have taken place since 2011 and there are also a number of sites where planning permission has previously been granted for some form of employment development.</p> <p>In addition to the existing provision, we need to consider whether some land currently in use for employment purposes could be lost to other uses. It is not possible to predict with any great certainty as to how much existing employment land might be lost in the future. Based on past trends it is proposed to assume that 45 hectares of employment land will be lost to other uses. The effect of this allowance is that there is a small shortfall of 13.26 hectares of employment land. This shortfall therefore needs to be taken account of in the draft Local Plan through allocations.</p> <p>The Local Plan is a land use plan and can only encourage economic development and can therefore not control the level of unemployment.</p> <p>In identifying employment sites, the sites within the Employment Land Availability Assessment 2014 have been assessed against the settlement hierarchy. There are currently no available, achievable and deliverable sites within the Coalville Urban Area. There are a number of sites within the northern parishes, however it is considered that in the view of the fact that there is already significant amount of employment in this area along with the recently approved Strategic Rail Freight Interchange additional employment would represent an imbalance with housing provision in the locality.</p> <p>In terms of Ashby de la Zouch two potential sites are included in the ELAA south of Ashby and north of Ashby. It is</p>		<p>Lesley Thom, Iain Thom, Graham Thom</p>	<p>NA</p>

	<p>considered that land to the north of Ashby would be the most appropriate site.</p> <p>The area of employment land allocated to the north of Ashby de la Zouch as part of residential development is currently only indicative and is subject to change. The draft policy states that "the provision of appropriate landscaping and other features so as to minimise the impact upon the adjoining housing development proposed...."</p> <p>The location of the employment land will need to be agreed as part of a masterplan.</p> <p>The policy also looks to provide cycle and walking links to the adjoining housing development. In terms of the provision of providing further cycle and walkways as part of new development these are covered by draft Local Plan IF1.</p>			
No	Noted.		Trevor Davis	None
Yes	Noted.		Measham Parish Council	Measham Parish Council
Yes	Noted.		Edward Hines	N/A
<p>Site ELAA:17 - Money Hill/Cliftonthorpe, Ashby</p> <p>We strongly disagree with the employment allocation of this prominent greenfield countryside side which is directly adjacent to 150 newly completed dwellings. 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.</p> <p>We are staggered by the insensitivity and lack of insight shown by the District council in proposing the Cliftonthorpe site for industrial and warehouse development when it is clear that there is no necessity and there are also many better brownfield options. These lie around Ashby but those at Coalville, adjacent to Coalville College on the A511 or Snibston for instance, and around the mining villages would better address the objectives of the plan. The district is a mixture of market towns, where the plan objectives of environmental protection and conservation are paramount and former mining settlements where the key objective of the plan is to continue to promote regeneration.</p> <p>This difficult to access greenfield land is outside the limits of development. The site was a very late addition to the employment sites list and incorrectly evaluated using an out of date plan. Given the key plan objectives for deliverable</p>	<p>In identifying employment sites, the sites within the Employment Land Availability Assessment 2014 have been assessed against the settlement hierarchy. There are currently no available, achievable and deliverable sites within the Coalville Urban Area. There are a number of sites within the northern parishes, however it is considered that in the view of the fact that there is already significant amount of employment in this area along with the recently approved Strategic Rail Freight Interchange additional employment would represent an imbalance with housing provision in the locality.</p> <p>In terms of Ashby de la Zouch two potential sites are included in the ELAA south of Ashby and north of Ashby. It is considered that land to the north of Ashby would be the most appropriate site.</p> <p>The proposed allocation reflects the proposals set out in a Master Plan prepared by the site promoters. The precise layout and other details remain to be agreed with the promoters of the site. It should be noted that there is no Green Belt land within Leicestershire and the site is currently defined as open countryside in the existing local plan. There is not currently any brownfield sites that are available, achievable and deliverable to meet the districts employment land needs over the plan period.</p>		Sue and Gerry Perks	N/A

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' we strongly oppose this allocation for the following reasons.

1) No evaluation justifying the need to direct further local employment land at Ashby 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.

2) This employment allocation at Money Hill comprises two small parcels of countryside outside limits to development. The western site at Cliftonthorpe has access difficulties and is unsuitable for modern day general industrial and warehousing use. It is a late addition to the plan and is not shown to have any particular merit in its own right at this point in time.

3) The crudely annotated and seriously outdated plan and false description of the Cliftonthorpe site given in Background Paper 6- site ELAA:17 are totally misleading and the wording relates more to the housing allocation in policy H3. Indeed the description given comprises a crude hand drawn boundary which worryingly strays over existing housing and undermines confidence in the plan makers understanding. The policy states erroneously that access can be arranged in conjunction with the larger separate housing site. DLPlan para 7.24.

4) The analysis shows no awareness of the opportunities to develop the existing leisure potential of this land. There is no mention that the sensitive western site is divided by a brook with endangered great crested newts and surrounded by walkways on all sides. These are already used regularly by many ramblers, (dog) walkers and horse riders from the adjacent equestrian centre. It offers unique opportunities for improved and forested footpath and bridleway links northwards across the A511 to the outstanding countryside areas of the Pistern Hills, Staunton Harold and

<p>Calke Abbey and the wider and developing National Forest network.</p> <p>5) The western greenfield site is directly linked to the south and east by 150 newly constructed houses in a development restricted to brownfield land. As purchasers are still moving in this adjacent employment allocation for unconstrained industrial and warehousing uses shows little empathy or consideration particularly when it is proposed to also sacrifice the nearby ARLA industrial site on Smisby Road for housing in policy H3a. NPPF. Para. 17 advises that the planning system should not simply be about scrutiny, but about finding ways to enhance and improve the places in which people live their lives.</p> <p>6) 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 extended. In addition unexamined but better located, more accessible and brownfield site options are available in Ashby between Nottingham Road and the A42 by the waste amenity or east of the A511 and A42 junction 13 and alongside the HS2 route whether it is finally approved or not.</p> <p>7) The proposal is directly related to the landownings of the consortium lobbying for the comprehensive housing development at Money Hill dealt with under policy H3a. However that proposal is included in the plan solely to cater for possible housing shortfalls in the distant areas of Coalville and possible employment growth around Castle Donington. It is therefore illogical to suggest that it is also necessary to sacrifice additional greenfield countryside to provide further employment for the same households.</p>				
<p>If there is insufficient confidence in the prediction of losing 45 hectares of employment land to other uses for allocation of some of this brown field land for housing, why is there sufficient confidence to use it to predict a need for another 13.26 hectares of employment land?</p> <p>I therefore question the need to allocate any further land for employment use given the residual requirement of +31.74 Ha.</p>	<p>There can be no certainty regarding how much existing employment land might be lost in the future. A site in use today may in another 10 years be no longer attractive to the employment market but would be attractive to another form of development. It is not possible to identify which sites or how many this might apply to, although it is reasonable to assume that it is more likely to be older stock.</p> <p>We have analysed, from a statistical point of view, the amount of employment land lost to other uses going back to</p>		David Bigby	Private individual

<p>There is no direct evaluation justifying the need to allocate further local employment land in Ashby. The town is not the most preferred 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.</p> <p>This employment allocation at Money Hill comprises two small parcels of countryside outside limits to development. The western site has access difficulties and is unsuitable for modern day general industrial and warehousing use. It is a late addition to the plan and is not shown to have any particular merit in its own right at this point in time. On the contrary its allocation seems to be justified on the basis of the landownings of the consortium lobbying for the comprehensive housing development at Money Hill dealt with under policy H3a.</p> <p>That housing proposal is only in the plan because an estimated 1750 overspill dwellings may possibly be required to accommodate the estimated growth in employment in the distant areas of Coalville and the northern employment growth area around Castle Donington. It is therefore illogical to suggest that it is also necessary to sacrifice additional greenfield countryside to provide further employment for the same households. The out of date and wrongly annotated plan and description of the western site given in Background Paper 6 are sloppy and totally misleading and relate more to the housing allocation in policy H3. Indeed the description given comprises a crude hand drawn boundary which worryingly strays over existing housing and reduces confidence in the plan. The policy states erroneously that access can be arranged in conjunction with the larger separate housing site. DLPlan para 7.24.</p> <p>The analysis shows little awareness of the opportunities to develop the existing potential of this land. There is no mention that the sensitive western site is divided by a brook with great crested newts and surrounded by walkways on all sides. These are already used regularly by many ramblers, (dog) walkers and horse riders from the adjacent equestrian centre. It offers unique opportunities for improved and forested footpath and bridleway links northwards across the A511 to</p>	<p>1991 and more recently.</p> <p>When this potential loss is built in to the employment land requirement there is a shortfall of about 13 hectares against the identified need of 96 hectares.</p> <p>In identifying employment sites, the sites within the Employment Land Availability Assessment 2014 have been assessed against the settlement hierarchy. There are currently no available, achievable and deliverable sites within the Coalville Urban Area. There are a number of sites within the northern parishes, however it is considered that in view of the fact that there is already significant amount of employment in this area along with the recently approved Strategic Rail Freight Interchange additional employment would represent an imbalance with housing provision in the locality.</p> <p>In terms of Ashby de la Zouch two potential sites are included in the ELAA south of Ashby and north of Ashby. It is considered that land to the north of Ashby would be the most appropriate site.</p> <p>The area of employment land allocated to the north of Ashby de la Zouch as part of residential development is currently only indicative and is subject to change. The A masterplan needs to be prepared and the layout agreed. The draft policy states that "the provision of appropriate landscaping and other features so as to minimise the impact upon the adjoining housing development proposed...."</p> <p>The policy also looks to provide cycle and walking links to the adjoining housing development. In terms of the provision of providing further cycle and walkways as part of new development these are covered by draft Local Plan IF1. Access by motorised vehicles to the site has been assessed by the Highways Authority which have raised no objection to the land allocation.</p> <p>It is acknowledged that the proposed site is outside of the currently adopted local plan limits to development, however the local plan expired in 2006 and therefore the limits to development are out of date and have been revised to accommodate growth to 2031 the end of the draft local plan period.</p> <p>Although it is acknowledged that the development of brownfield land before greenfield land is the preferred option, there is not currently enough available, achievable and deliverable brownfield sites to meet the districts employment land requirements over the plan period.</p>			
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<p>the outstanding countryside areas of the Pistern Hills, Staunton Harold and Calke Abbey and the wider and developing National Forest network.</p> <p>The western greenfield site is linked to the south and east by 150 new houses in a development restricted to brownfield land. As purchasers are still moving in this adjacent employment allocation for unconstrained industrial and warehousing uses shows little empathy or consideration.</p> <p>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 extended. In addition unexamined but better located, more accessible and brownfield site options are available in Ashby between Nottingham Road and the A42 by the waste amenity or east of the A511 and A42 junction 13 and alongside the HS2 route whether it is finally approved or not.</p> <p>In summary there is little direct necessity to use greenfield countryside at Money Hill for industrial and warehouse development when other better options are available. Indeed many more suitable brownfield sites, for example adjacent to Coalville College on the A511, Snibston colliery plus numerous smaller sites around the mining villages, could better address the regeneration objectives of the plan.</p> <p>However should the allocation of employment land at Money Hill go ahead then I would advocate that under policy Ec2 a) employment land vehicles should be segregated from housing estate vehicles as much as possible. Using the same access to the A511 from the two Money Hill employment sites and the housing estate would have significant safety implications. Access to the A511 from the westerly EC2 should be to Smisby Road and thence to the A511. Access from the easterly site should be via the existing access from EC3 or separately onto A511.</p>				
<p>Policy Ec2 of the Plan proposes the allocation of 16 hectares of land north of Ashby de la Zouch to address an identified shortfall of 13.26 hectares.</p> <p>Background Paper 6 refers to the proposed</p>	<p>The local plan allocates sufficient land to meet the districts employment land requirements for the plan period in accordance with the settlement hierarchy. The supporting text already notes that the Council is working with a range of</p>		<p>Jeremy Williams</p>	<p>ID Planning</p>

<p>allocation resulting from sites put forward and considered as part of the Employment Land Availability Assessment (ELAA) 2013/14 and then having regard to the settlement hierarchy.</p> <p>As we have set out in response to question 7 we do not consider the proposed settlement hierarchy is effective and that it currently conflicts with the wider economic strategy and in particular the LEP economic strategy. This is evident in Policy Ec2 which does not allocate additional land in the East Midlands Enterprise Gateway growth area despite the growth objective for the area.</p> <p>Paragraphs 4.5 to 4.8 of Background Paper 6 create confusing and conflicting statements in the assessment of sites to address the employment shortfall.</p> <p>Paragraph 4.7 states that the Castle Donington area has significant commitments available and that further allocations were discounted so as not to create an imbalance with housing provision in the locality. This statement seems to conflict with the future housing provision which has regard to the potential employment growth figures (see paragraph 5.8 Draft Plan).</p> <p>Further conflict arises from paragraph 4.5 of the Background Paper 6 which states that sites in Coalville are unsuitable for employment use due to the proximity of residential development. Paragraph 4.8 states that mixed use sites in Ashby-de-la-Zouch represent sustainable forms of development. Further clarification should be provided on the reasons for discounting the alternative employment sites.</p> <p>The allocation of the employment site in Ashby-de-la-Zouch resulted from consideration of the sites put forward as part of the ELAA. In September 2014, the authority carried out a consultation on the Local Plan which resulted in representations being made to the plan. We submitted a representation at that time on behalf of our client suggesting that their site known as East of Finger Farm, was allocated for employment.</p> <p>Having considered the background documents available, we are unable to find evidence that this site has been properly considered and assessed in</p>	<p>partners to deliver the East Midlands Enterprise Gateway.</p>			
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accordance with paragraph 161 of NPPF.

We therefore consider that the Plan is unsound as it is not Justified in accordance with Paragraph 182 of NPPF having not considered the allocations against the reasonable alternatives.

My clients site (East of Finger Farm) is allocated as open countryside on the draft proposals map. The allocation in the adopted plan and the acknowledgement of an implemented permission on the site establishes the principle of development in this sustainable location.

Based on the historic policy basis and implemented permission for a petrol filling station and motorist's restaurant it is considered the site should be included in the Primary Employment Area and East Midlands Airport Boundary.

Background Paper 8 provides more information on policies Ec5, Ec6 and Ec7 which relate to East Midlands Airport. Paragraph 15.1 refers to the LLEP and in particular the Strategic Economic Plan (SEP). The East Midlands Enterprise Gateway (EMEG) area is identified as a priority growth area, the document states:

"EMEG is centred around East Midlands Airport, within the boundaries created by the M1 to the east, with the A40 and A42 to the north and south. The airport is seen as one of the businesses driving growth in the area."

The exclusion of the site (East of Finger Farm) suggests that the Local Plan is unsound as the proposed plan is not currently positively prepared or justified based on the evidence which clearly suggests that that the employment growth area is bounded by the M1 to the east. Our clients site is therefore identified by the SEP as falling within the EMEG and should be allocated.

The inclusion of the site in East Midlands Airport boundary would take in the current allocation for road related service facilities as reflected by the implemented development but would also provide an area for potential alternative uses to support the growth of East Midlands Airport further.

The eastern boundary of my clients site is formed

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<p>by the M1. The inclusion of the site within the employment allocation would result in a clearly defined and permanent boundary to the allocation and correlate with the boundary of the EMEG referred to in the evidence base and the SEP.</p> <p>In addition, the proposed allocation would provide an additional 1.58 hectares of employment land to support the East Midlands Enterprise Gateway and Pegasus Business Park at the airport.</p> <p>The proposed site would also provide an alternative location to the 16 hectares of land proposed at Ashby-de-la-Zouch to address the 13 hectare shortfall in the employment land requirement. The proposed site would provide 1.5 hectares in the EMEG making the plan sound by strengthening the hierarchy (as we have proposed), linking the growth allocations with the LEP Strategic Economic Plan strategy as required by paragraph 160 of NPPF.</p> <p>It is considered that the site known as East of Finger Farm which has a history that acknowledges its suitability and sustainability for development should be allocated as part of the Pegasus Business Park and East Midlands Airport to ensure the delivery of the wider East Midlands Enterprise Gateway and ensure the Plan is sound in accordance with NPPF.</p>				
Yes	Noted.		Lance Wiggins	Landmark Planning

<p>While the National Forest Company has no comment to raise regarding the proposed allocation, Policy Ec2 should be amended to ensure integrated green infrastructure is provided by the development.</p> <p>Part (c) refers to 'appropriate landscaping' however the National Forest Company considers that this is not sufficient to ensure a sufficient green infrastructure network is created within the allocation and across the whole of the Money Hill area.</p> <p>The development should be expected to include a green infrastructure network which provides ecological connectivity to both existing and proposed green infrastructure (created through the housing development) and incorporates footpath and cycle links to the proposed housing, neighbouring existing employment area and to the wider countryside utilising the existing footpath under the A511.</p> <p>The Policy should therefore set out that it expects the application to demonstrate how green infrastructure has been incorporated into the proposal and how this will allow ecological and pedestrian / cycle connectivity across the wider Money Hill site.</p>	<p>Noted and agree that the policy needs to include reference to the incorporation of Green Infrastructure into the proposal.</p>	<p>Amend the policy to include reference to the incorporation of Green Infrastructure.</p>	<p>Philip Metcalfe</p>	<p>The National Forest Company</p>
<p>Yes</p>	<p>Noted.</p>		<p>Mr. j Lewis</p>	<p>1950</p>
<p>Ashby needs a good supply of employment land to attract employers to the town to replace jobs lost by recent closures and stop the town becoming just a dormitory for long-distance commuters . However , it is unacceptable to mix factories/warehouses/offices up with existing/proposed housing , the two need to be kept separate . The current proposal for Ashby does not do that and should be rethought .</p>	<p>The provision of employment as part of a strategic, mixed use development provides an opportunity to create a well designed development which ensures that housing and employment can co-exist.</p> <p>Draft Local Plan Policy Ec2 states that there is a need to provide for provision of appropriate landscaping and other features so as to minimise the impact upon the adjoining housing development proposed under H3a.</p>		<p>Michael Ball</p>	<p>Individual</p>
<p>In 7.21 it states: " no suitable sites were considered to be available in Coalville."</p> <p>The former Greives site as well as land on Bridge Road, were either of them not to be used for housing, spring to mind.</p>	<p>The District Council carried out a call for sites as part of preparing the Employment Land Availability Assessment (ELAA) so as to try and identify a pool of potential sites. As a result of preparing the ELAA and allowing for the fact that some sites have gained planning permission (e.g. two sites at Bardon) there are no available sites in Coalville, more information is available in the supporting background paper on the the site selection process. The site to the north of Ashby is proposed to be mixed use 16ha for employment use and 1750 new dwellings.</p>		<p>Steve Johnson</p>	<p>YYYY</p>
<p>Yes</p>	<p>Noted</p>		<p>Mrs Paula Ashfield</p>	<p>Paula Ashfield</p>

WYG, on behalf of TNT UK Limited, have provided a separate detailed response in relation to this and with particular reference to the TNT's Lount Hub.	Noted.		Nick Bowden	WYG
Policy Ec2 generally sound but have some concern about handling of joint access off A511 shared with housing (Ec2 a)	Noted.		Tim Abbott	Householder
The formulas are wrong for EMG. Also, the assumption of commuters does not imply there are more jobs than home in Coalville (for example). It implies people do not want to live in Coalville but this is where the work is. Coalville is already much cheaper than surrounding Districts therefore if people wanted to live here then they already would!	The formulas used in relation to East Midlands Gateway for the number of jobs provided as part of the proposal have been provided as part of their application. It is important to balance the number of jobs and people of working age living at district level. This results in the need to provide further housing.		Jane Tebbatt	Quarrying
Yes	Noted.		Heather Parish Council	Heather Parish Council
Yes	Noted.		JON WALTERS	LPT
We strongly disagree with the employment allocation of this prominent greenfield countryside which is directly adjacent to 150 newly completed dwellings. 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 the key plan objectives 11 and 12... We are disappointed by the lack of awareness and consideration shown by the District Council in proposing this sensitive Clifonthorpe site for industrial and warehouse development. It would impose industrial development on the third side of the newly developed Ivanhoe fields residential estate when it is clear that there is no real need and there are also better brownfield options. These lie around Ashby but those at Coalville, adjacent to Coalville College on the A511 or Snibston for instance, and around the mining villages would better address the objectives of the plan. The district is a mixture of market towns, where the plan objectives of environmental protection and conservation are paramount and former mining settlements where the key objective 6 of the plan is to continue to promote regeneration. This difficult to access greenfield land is outside the limits to development. The site was a very late	The proposed allocation reflects the proposals set out in a Master Plan prepared by the site promoters. The precise layout and other details remain to be agreed with the promoters of the site. The policy also states that there will be the need to provide appropriate landscaping and other features so as to minimise the impact upon the adjoining housing development proposed with the provision of cycle and walking links to the adjoining housing. In terms of developing green infrastructure as part of new development this is covered by draft Local Plan IF1. It is proposed that the policy will be amended to ensure that the planning application will need to demonstrate how Green Infrastructure is incorporated into the site. It is acknowledged that the proposed site is outside of the currently adopted local plan limits to development, however the local plan expired in 2006 and therefore the limits to development are out of date and have been revised to accommodate growth to 2031 the end of the draft local plan period. Access to the site has been assessed by the Highways Authority which have raised no objection to the land allocation. Although it is acknowledged that the development of brownfield land over greenfield land is the preferred option, there is not currently enough available, achievable and deliverable brownfield sites to meet the districts employment land needs over the plan period.		Dominic and Christine Fellow	NA

addition to the employment sites list and falsely evaluated using an out of date plan. 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' we strongly oppose this allocation for the following reasons.

1) No evaluation justifying the need to direct further local employment land at Ashby 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 areas which could benefit more from this investment.

2) This employment allocation at Money Hill comprises two small parcels of countryside outside limits to development. The western site at Cliftonthorpe has access difficulties and is unsustainable for modern day general industrial and warehousing use. It is a late addition to the plan and is not shown to have any particular merit in its own right at this point in time.

3) The crudely annotated and seriously outdated plan and false description of the Cliftonthorpe site given in Background Paer 6- site ELAA: 17 are totally misleading and the wording relates more to the housing allocation in policy H3. Indeed the description given comprises a crude hand drawn boundary which worryingly strays over existing housing and undermines confidence in the plan makers understanding. The policy states erroneously that access can be arranged in conjunction with the larger separate housing site. DLPlan para 7.2.4.

4) The analysis shows no awareness of the opportunities to develop the existing leisure potential of this land. There is no mention that the sensitive western site is divided by a brook with endangered great crested newts and surrounded by walkways on all sides. These are already used regularly by many ramblers walkers and horse riders from the adjacent equestrian centre. it offers unique opportunities fro improved and

<p>forested footpath and bridleway 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 network.</p> <p>5) the western greenfield site is directly linked to the south and east by 150 newly constructed houses in a development restricted to brownfield land. As purchasers are still moving into this adjacent employment allocation for unconstrained industrial and warehousing uses shows little empathy or consideration particularly when it is proposed to also sacrifice the nearby ARLA industrial site on Smisby Road for housing in policy H3a. NPPF. Para 17 advises that the planning system should not simply be about scrutiny, but about finding ways to enhance and improve the places in which people live their lives.</p>				
<p>I would add that cycling and walking provision should be extended to not only the proposed housing development but to other existing cycleways and walkway to ensure a joined up network of cycle and walkways which would promote more cycling and walking in n.w. Leicestershire.</p>	<p>Noted additional cycle and walkways as part of new development is covered by draft Local Plan policy IF1 and Ec2.</p>		<p>Alison Saxby</p>	<p>N/A</p>
<p>NWLDC is focused on the Roxhill Development providing employment in the north of the County. What if Roxhill does not go ahead? Alternative potential employment sites need to be identified including land adjacent to J24 of the M1 off the A6 and A453.</p>	<p>The district council is supportive of the proposal and therefore took account of the application when drafting the plan. The proposal has since been granted planning permission.</p>		<p>Vicky Roe</p>	<p>Kegworth Parish Council</p>
<p>(a) We do not agree</p> <p>(b) The Labour Group recognise that land needs to be made available for new employment – but there has been a failure to engage with communities (large and small) in discussions where the best location is for new employment land</p> <p>(c) There must be a ‘brownfield first’ policy</p> <p>(d) If there is insufficient confidence in the prediction of losing 45 hectares of employment land to other uses for allocation of some of this brown field land for housing, why is there sufficient confidence to use it to predict a need for another 13.26 hectares of employment land?</p> <p>(e) We therefore question the need to allocate any</p>	<p>The initial consultation on the preparation of the local plan in summer 2014 asked what ought to be included within the Local Plan.</p> <p>In identifying employment sites, the sites within the Employment Land Availability Assessment 2014 have been assessed against the settlement hierarchy. There are currently no available, achievable and deliverable sites within the Coalville Urban Area. There are a number of sites within the northern parishes, however it is considered that in the view of the fact that there is already significant amount of employment in this area along with the recently approved Strategic Rail Freight Interchange additional employment would represent an imbalance with housing provision in the locality.</p> <p>In terms of Ashby de la Zouch two potential sites are included in the ELAA south of Ashby and north of Ashby. It is</p>		<p>Sue McKendrick</p>	<p>Labour Group leader</p>

<p>further land for employment use, given the stated residual requirement of +31.74 Ha.</p> <p>(f) However, should the allocation of employment land at Money Hill go ahead then the Labour Group advocate that under policy Ec2 a), employment land vehicles should be segregated from housing estate vehicles as much as possible. Using the same access to the A511 from the two Money Hill employment sites and the housing estate would have significant safety implications. Access to the A511 from the westerly EC2 should be to Smisby Road and thence to the A511. Access from the easterly site should be via the existing access from EC3 or separately onto the A511.</p> <p>(g) Development deliverability will reflect the outcome of this question</p> <p>(h) We question why this council has not taken up Government's position to build a new freestanding Garden Village with employment provision? This option needs to be seriously considered on land that will not overwhelm existing larger settlements.</p>	<p>considered that land to the north of Ashby would be the most appropriate site.</p> <p>As part of carrying out the site selection process set out above, there are currently no available, achievable and deliverable brownfield sites to meet the districts employment land needs over the plan period.</p> <p>Although the district has met its employment land requirements through extant permissions the Planning Practice Guidance (Housing and Economic Development Needs Assessment) advises that in considering future economic needs consideration should be given to "The recent pattern of employment land supply and loss to other uses".</p> <p>In considering the amount of future employment land needed, it is, therefore, appropriate to have regard to the likelihood that over the plan period some land currently used for employment uses will be lose to other uses, particularly housing.</p> <p>There can be no certainty regarding how much existing employment land might be lost in the future. A site in use today may in another 10 years be no longer attractive to the employment market but would be attractive to another from of development. It is not possible to identify which sites or how many this might apply to, although it is reasonable to assume that it is more likely to be older stock.</p> <p>We have therefore analysed, from a statistical point of view, the amount of employment land lost other uses going back to 1991 and more recently. Based on this analysis when the potential loss is built into the calculations there is now a shortfall of about 13 hectares against the identified need of 96 hectares.</p> <p>The employment sites shown on the draft policies map are only indicative at this stage and are subject to change. A materplan will need to be prepared to allow the layout of the site to be agreed. Access will primarily will be from the A511 and Smisby Road.</p> <p>Access issues have been discussed with the Highways Authority who have not raised any objections.</p> <p>The option for a new standalone settlement has been tested as part of the viability appraisal, but due to the small number of dwellings that are required is not seen as viable. There are also not currently any sites being promoted through the SHLAA or ELAA that could contain a standalone settlement.</p>			
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<p>Land must be allocated for employment in Coalville. Further space must be allocated. Policy J5 for Ashby should be renewed. Lounge site is unlikely to be developed and should be removed and an alternative allocated. Employment site on moneyhill should all be adjacent to current Tesco site.</p>	<p>Within the Coalville Urban Area there are over 40 hectares of employment land covered by policy Ec1.</p> <p>In identifying additional employment sites, the sites within the Employment Land Availability Assessment 2014 have been assessed against the settlement hierarchy. There are currently no available, achievable and deliverable sites within the Coalville Urban Area.</p> <p>There are a number of available sites within the northern parishes, however it is considered that in the view of the fact that there is already significant amount of employment in this area along with the recently approved Strategic Rail Freight Interchange additional employment would represent an imbalance with housing provision in the locality.</p> <p>In terms of Ashby de la Zouch two potential sites are included in the ELAA south of Ashby and north of Ashby. It is considered that land to the north of Ashby would be the most appropriate site.</p> <p>The proposed allocation reflects the proposals set out in a Master Plan prepared by the site promoters. The precise layout and other details remain to be agreed with the promoters of the site.</p> <p>The Lounge site currently has planning permission and is although it is acknowledged that it could be affected by the proposals for HS2..</p>	<p>Amend the policy to include reference to the incorporation of Green Infrastructure.</p>	<p>C Tandy</p>	<p>Ashby de la Zouch Civic Society</p>
<p>To support the achievement of a net gain for biodiversity and to better align with National Planning Policy we request the following change to Policy EC2 part (c):</p> <p>“(c) The provision of appropriate landscaping, planting and other features so as to minimise the impact upon the adjoining housing development proposed under Policy H3a as well as impacts on the wider landscape and biodiversity; and ;”</p>	<p>Noted and a change will be made within the policy to include reference to the impacts landscape and biodiversity.</p>	<p>A change to be made to include the impacts of development on biodiversity, landscape and the inclusion of Green Infrastructure to reflect the National Forest representation.</p>	<p>Kim Miller</p>	<p>National Trust</p>

<p>We strongly disagree with the employment allocation of this prominent greenfield countryside side which is directly adjacent to 150 newly completed dwellings. 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..</p> <p>We are disappointed by the lack of awareness and consideration shown by the District Council in proposing this sensitive Cliftonthorpe site for industrial and warehouse development. It would impose industrial development on the third side of the newly developed Ivanhoe fields residential estate when it clear that there is no real need and there are also many better brownfield options.</p> <p>These lie around Ashby but those at Coalville, adjacent to Coalville College on the A511 or Snibston for instance, and around the mining villages would better address the objectives of the plan. The district is a mixture of market towns, where the plan objectives of environmental protection and conservation are paramount and former mining settlements where the key objective 6 of the plan is to continue to promote regeneration.</p> <p>This difficult to access greenfield land is outside the limits of development. The site was a very late addition to the employment sites list and falsely evaluated using an out of date plan. 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' we strongly oppose this allocation for the following reasons.</p> <p>1) No evaluation justifying the need to direct further local employment land at Ashby 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.</p>	<p>The proposed allocation reflects the proposals set out in a Master Plan prepared by the site promoters. The precise layout and other details remain to be agreed with the promoters of the site.</p> <p>The policy also states that there will be the need to provide appropriate landscaping and other features so as to minimise the impact upon the adjoining housing development proposed with the provision of cycle and walking links to the adjoining housing. In terms of developing green infrastructure as part of new development this is covered by draft Local Plan IF1. It is proposed that that the policy will be amended to ensure that the planning application will need to demonstrate how Green Infrastructure is incorporated into the site.</p> <p>It is acknowledged that the proposed site is outside of the currently adopted local plan limits to development, however the local plan expired in 2006 and therefore the limits to development are out of date and have been revised to accommodate growth to 2031 the end of the draft local plan period.</p> <p>Access to the site has been assessed by the Highways Authority which have raised no objection to the land allocation.</p> <p>Although it is acknowledged that the development of brownfield land over greenfield land is the preferred option, there is not currently enough available, achievable and deliverable brownfield sites to meet the districts employment land needs over the plan period.</p>	<p>Amend the policy to include reference to the incorporation of Green Infrastructure.</p>	<p>David Owen</p>	<p>Cliftonthorpe Management Company</p>
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<p>2) This employment allocation at Money Hill comprises two small parcels of countryside outside limits to development. The western site at Cliftonthorpe has access difficulties and is unsuitable for modern day general industrial and warehousing use. It is a late addition to the plan and is not shown to have any particular merit in its own right at this point in time.</p> <p>3) The crudely annotated and seriously outdated plan and false description of the Cliftonthorpe site given in Background Paper 6- site ELAA:17 are totally misleading and the wording relates more to the housing allocation in policy H3. Indeed the description given comprises a crude hand drawn boundary which worryingly strays over existing housing and undermines confidence in the plan makers understanding. The policy states erroneously that access can be arranged in conjunction with the larger separate housing site. DLPlan para 7.24.</p> <p>4) The analysis shows no awareness of the opportunities to develop the existing leisure potential of this land. There is no mention that the sensitive western site is divided by a brook with endangered great crested newts and surrounded by walkways on all sides. These are already used regularly by many ramblers, (dog) walkers and horse riders from the adjacent equestrian centre. It offers unique opportunities for improved and forested footpath and bridleway 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 network.</p> <p>5) The western greenfield site is directly linked to the south and east by 150 newly constructed houses in a development restricted to brownfield land. As purchasers are still moving in this adjacent employment allocation for unconstrained industrial and warehousing uses shows little empathy or consideration particularly when it is proposed to also sacrifice the nearby ARLA industrial site on Smisby Road for housing in policy H3a. NPPF. Para. 17 advises that the planning system should not simply be about scrutiny, but about finding ways to enhance and improve the places in which people live their lives.</p>				
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<p>6) 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 extended. In addition unexamined but better located, more accessible and brownfield site options are available in Ashby between Nottingham Road and the A42 by the waste amenity or east of the A511 and A42 junction 13 and alongside the HS2 route whether it is finally approved or not.</p> <p>7) The proposal is directly related to the landownings of the consortium lobbying for the comprehensive housing development at Money Hill dealt with under policy H3a. However that proposal is included in the plan solely to cater for possible housing shortfalls in the distant areas of Coalville and possible employment growth around Castle Donington. It is therefore illogical to suggest that it is also necessary to sacrifice additional greenfield countryside to provide further employment for the same households.</p>				
<p>Site Ec2 (north of Ashby) - lies within Mineral Consultation Areas (and proposed Mineral Safeguarding Areas) because it contains potential near surface coal resources. A mineral assessment of the potential effect of the proposed development on the mineral resource beneath and adjacent to the site should be carried out. (It is noted however that most of the Ashby proposal lies within the development area proposed in planning application 15/00512/OUTM. The MPA had no objection to this application on mineral safeguarding grounds based on information supplied indicating that the shallow coal seams underlying the site were not viable to be worked.)</p> <p>In the allocation for employment sites the approach needs to reflect the potential loss of existing development and allocated employment sites to the HS2 project. Flexibility is required to allow alternative potential sites to be brought forward in advance of HS2 to secure long term employment opportunity within settlements. In particular, in relation to the LCC portfolio Burton Road, Measham to compensate potential loss of existing sites on the Repton Road development including Huntington Court.</p>	<p>Noted, It is proposed to include a generic policy regarding proposals located within a Minerals Consultation Area. The Local Plan has made allowance for the potential loss of employment land (existing and proposed) when calculating the future employment land requirements.</p>	<p>Include a new generic policy to require the need for applications for development in Minerals Consultation Areas to be accompanied by a minerals assessment to assess the potential effect on the mineral resource.</p>	<p>Sharon Wiggins</p>	<p>Leicestershire County Council</p>

<p>It is noted that the Plan does not allocate a residual 13 hectares of employment land and that no firm conclusions are drawn on the location of the shortfall. The background paper supporting policies EC1, 2 and 3 does not mention the TNT Lount site.</p>	<p>The draft Local Plan policy Ec2 allocates 16ha of employment land to the north of Ashby to account for the residual shortfall.</p> <p>The land at Lount referred to in the representation was recommended in the Employment Land Study 2010 as being a site that should be protected. It would, therefore, be appropriate to include it in the list of sites to which policy Ec3 applies.</p>	<p>Amend the Local Plan to include the TNT Lount site under Ec3.</p>	<p>Nick Bowden</p>	<p>WYG Environment Planning Transport Limited</p>
<p>Objection – At the time of writing the Council’s website was not functioning. The Coal Authority could therefore not find the SA or any site assessment methodology published for comment.</p> <p>Consequently, The Coal Authority assumes that the site allocation process has taken due cognisance of the issues of mineral sterilisation and unstable land alongside other appropriate criteria. The Council need to publish such evidence to avoid the need for The Coal Authority to maintain an objection at the publication/submission stage.</p> <p>Reason – To ensure that the site allocations take due cognisance of advice in paragraphs 109, 120, 121, 143, 144 and 166 of the NPPF.</p>	<p>Noted.</p>		<p>Chris MacArthur</p>	<p>The Coal Authority</p>
<p>Yes. I would add that cycling and walking provision should be extended to not only the proposed housing development but to other existing cycleways and walkway to ensure a joined up network of cycle and walkways which would promote more cycling and walking in n.w. Leicestershire.</p>	<p>Noted. Cycle and walkways as part of new development are covered by draft Local Plan policy IF1 and Ec2.</p>		<p>Mrs. A Saxby</p>	<p>n/a</p>

<p>Question 18 - The allocation of the full quota of new employment land to the Money Hill location as part of a mixed use development scheme is likely to prove ineffective in terms of delivery. Employment land values are generally inadequate to support major new infrastructure provision and the viability of the Money Hill housing allocation is questionable in terms of the deliverability of housing and affordable housing, even without subsidising the infrastructure required for the employment use. This proposition should be the subject of viability testing with the employment being delivered in phased fashion with the delivery of housing and prior to its completion. A mixed use housing and employment allocation to the south of Ashby would be more deliverable and would address historic issues of the distance from this location to the existing employment areas in the town, producing a more balanced settlement pattern.</p>	<p>The mixed use scheme has been tested as part of the viability appraisal and suggests that the development is viable. The viability assessment can be viewed as part of the local plan supporting evidence base.</p>		<p>Sigma Plan</p>	<p>Sigma Plan on behalf of Hallam Land Management</p>
<p>Yes however CDPC is concerned that NWLDC has presumed SFRI is going ahead.</p>	<p>The District Council is supportive of the proposal and therefore has taken account of the proposed development as part of the local plan. Since the drafting of the plan, the proposal has since gained permission.</p>		<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

<p>As there is already sufficient allocated land to meet the basic employment need in DLPlan para 5.6 I propose that the allocation in policy Ec2 on greenfield land at Cliftonthorpe Money Hill Ashby be withdrawn.</p> <p>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 under objective 6.</p> <p>I strongly disagree with the employment allocation of this prominent greenfield countryside side which is directly adjacent to 150 newly completed dwellings and contrary to objective 3.</p> <p>Instead the plan for Money Hill should highlight the unique potential for developing footpath and associated recreational links northwards from Ashby towards the outstanding National Forest countryside beyond the A511 to meet objectives 11 and 12.</p> <p>We strongly disagree with the employment allocation of this prominent greenfield countryside side which is directly adjacent to 150 newly completed dwellings. 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..</p> <p>We are disappointed by the lack of awareness and consideration shown by the District Council in proposing this sensitive Cliftonthorpe site for industrial and warehouse development. It would impose industrial development on the third side of the newly developed Ivanhoe fields residential estate when it clear that there is no real need and there are also many better brownfield options.</p> <p>These lie around Ashby but those at Coalville, adjacent to Coalville College on the A511 or Snibston for instance, and around the mining villages would better address the objectives of the plan. The district is a mixture of market towns, where the plan objectives of environmental protection and conservation are paramount and former mining settlements where the key objective</p>	<p>The proposed allocation reflects the proposals set out in a Master Plan prepared by the site promoters. The precise layout and other details remain to be agreed with the promoters of the site.</p> <p>The policy also states that there will be the need to provide appropriate landscaping and other features so as to minimise the impact upon the adjoining housing development proposed with the provision of cycle and walking links to the adjoining housing. In terms of developing green infrastructure as part of new development this is covered by draft Local Plan IF1. It is proposed that the policy will be amended to ensure that the planning application will need to demonstrate how Green Infrastructure is incorporated into the site.</p> <p>It is acknowledged that the proposed site is outside of the currently adopted local plan limits to development, however the local plan expired in 2006 and therefore the limits to development are out of date and have been revised to accommodate growth to 2031 the end of the draft local plan period.</p> <p>Access to the site has been assessed by the Highways Authority which have raised no objection to the land allocation.</p> <p>Although it is acknowledged that the development of brownfield land over greenfield land is the preferred option, there is not currently enough available, achievable and deliverable brownfield sites to meet the districts employment land needs over the plan period.</p>	<p>Amend the policy to include reference to the incorporation of Green Infrastructure.</p>	<p>Cliftonthorpe Residents c/o Robert Yates</p>	<p>n/a</p>
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<p>6 of the plan is to continue to promote regeneration.</p> <p>This difficult to access greenfield land is outside the limits of development. The site was a very late addition to the employment sites list and falsely evaluated using an out of date plan. 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' we strongly oppose this allocation for the following reasons.</p> <p>1) No evaluation justifying the need to direct further local employment land at Ashby 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.</p> <p>2) This employment allocation at Money Hill comprises two small parcels of countryside outside limits to development. The western site at Cliftonthorpe has access difficulties and is unsuitable for modern day general industrial and warehousing use. It is a late addition to the plan and is not shown to have any particular merit in its own right at this point in time.</p> <p>3) The crudely annotated and seriously outdated plan and false description of the Cliftonthorpe site given in Background Paper 6- site ELAA:17 are totally misleading and the wording relates more to the housing allocation in policy H3. Indeed the description given comprises a crude hand drawn boundary which worryingly strays over existing housing and undermines confidence in the plan makers understanding. The policy states erroneously that access can be arranged in conjunction with the larger separate housing site. DLPlan para 7.24.</p> <p>4) The analysis shows no awareness of the opportunities to develop the existing leisure potential of this land. There is no mention that the sensitive western site is divided by a brook with endangered great crested newts and surrounded</p>				
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<p>by walkways on all sides. These are already used regularly by many ramblers, (dog) walkers and horse riders from the adjacent equestrian centre. It offers unique opportunities for improved and forested footpath and bridleway 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 network.</p> <p>5) The western greenfield site is directly linked to the south and east by 150 newly constructed houses in a development restricted to brownfield land. As purchasers are still moving in this adjacent employment allocation for unconstrained industrial and warehousing uses shows little empathy or consideration particularly when it is proposed to also sacrifice the nearby ARLA industrial site on Smisby Road for housing in policy H3a. NPPF. Para. 17 advises that the planning system should not simply be about scrutiny, but about finding ways to enhance and improve the places in which people live their lives.</p> <p>6) 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 extended. In addition unexamined but better located, more accessible and brownfield site options are available in Ashby between Nottingham Road and the A42 by the waste amenity or east of the A511 and A42 junction 13 and alongside the HS2 route whether it is finally approved or not.</p> <p>7) The proposal is directly related to the landownings of the consortium lobbying for the comprehensive housing development at Money Hill dealt with under policy H3a. However that proposal is included in the plan solely to cater for possible housing shortfalls in the distant areas of Coalville and possible employment growth around Castle Donington. It is therefore illogical to suggest that it is also necessary to sacrifice additional greenfield countryside to provide further employment for the same households.</p>				
<p>There is no reference to employment allocations within the strategic site appraisal of the Sustainability Appraisal or within appendix c, Site appraisal proformas. Assessment is required.</p>	<p>Noted. Employment Sites will be assessed as part of the next stage of the Sustainability Appraisal.</p>		<p>Emilie Carr</p>	<p>Historic England</p>

Policy Ec3: Existing Employment Areas

Question 19 Do you agree with our suggested approach in respect of existing employment areas? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes	Noted		Lisa Marron	Resident
We need more to protect existing employment sites	Noted. Only the sites assessed as part of the 'Assessment of Employment Sites 2010' that have been assessed as being worthy of protection are proposed to be protected under Ec3.		Mr s Whitehouse	Personal
<p>Again the allocations in Ashby should be dependent on major improvements to public transport connections, not just cycle and walking links. The proposed policy does not take into account sufficiently the LCC Policy to reduce car usage.</p> <p>East Midland Airport development again should be linked to public transport provision from the whole area.</p> <p>Brownfield sites should also be encouraged for new employment provision. The existing process of utilising former industrial sites for housing, which then pushes new employment sites onto greenfield does not protect the countryside.</p>	Noted. Issues addressed elsewhere.		Nigel Garnham	Packington Nook Residents Association
Yes	Noted		Mark Chadbourn	Emerald Eye Ltd
Yes	Noted		Alison Wright	Heather Parish Council

<p>Page 59 -Item 7.26</p> <p>It is not for the Council or local tax payers to maintain unused industrial land or buildings. That is for the owners to do. It is rare that unused industrial buildings are suitable for new tenants without much alteration and associated expense. An example is the Mitchell Grieve property.</p> <p>Page 61</p> <p>Question 19</p> <p>No I do not agree. Land for industrial use should be situated more remotely from residential areas to allow wider selection of industries. We already have land close to towns in NWL allocated for industrial use but undeveloped for years. These areas have become unsightly waste areas affecting the visual aspect of the towns to visitors and residents.</p> <p>Don't continue to make the same mistakes. This policy will just provide more of same.</p>	<p>By safeguarding existing employment sites, this is protecting land and buildings from inappropriate uses. This does make the council responsible for maintaining unused business premises.</p> <p>It is important to seek to safeguard the existing stock of employment land and buildings from other uses, in order to provide a basis for continuing economic prosperity of the area. An assessment of employment sites was undertaken in 2010 which concluded that most sites were still relevant from an employment point of view and should therefore be retained in employment use. Those sites identified in the study as being worthy of retention for employment use are accordingly identified as Primary Employment Areas.</p> <p>It is acknowledged that some of the identified Primary Employment Areas have yet to be completed.</p> <p>The Local Plan does not protect all employment sites as those sites that are not identified by the local plan as primary employment sites do not receive the same protection. It is recognised that they have a role to play in the local economy however it may sometimes be more appropriate to allow for their redevelopment for non - employment uses. By allocating land for industrial uses away from the built up areas in remote locations would be contrary to the NPPF and would not be sustainable development.</p>		Steve Palmer	NA
NO COMMENT	Noted.		Samantha Lockwood	Long Whatton and Diseworth Parish Council
Yes	Noted.		Mr Robert Harlow	Harlow Bros Ltd
Yes	Noted.		David Harris	Pyrotect Ltd
The decision to accept some B8 (storage and distribution) development on land at Ashby Business Park is welcomed. As is the continued exclusion of applications for other uses e.g. retail, hotels and public houses.	Noted.		Karen Edwards, Deputy Town Clerk	Ashby de la Zouch Town Council
Yes	Noted.		Andrew Stone	NA
No	Noted.		Trevor Davis	None
Yes	Noted.		Measham Parish Council	Measham Parish Council
Yes	Noted.		Edward Hines	N/A
Ec3 4) B8 development should NOT be allowed on Ashby Business Park. This needs to be reserved for high quality offices. There are plenty of warehousing site already allocated. This policy would lead to degradation of the site and a loss of attractiveness to high added value, highly paying white collar employers.	NPPF requires that we are flexible and the site has been promoted for nearly 20 years and has yet to be developed in its entirety. The Employment Study 2010 supports B8 uses on the site as a means to provide such flexibility.		David Bigby	Private individual
Yes	Noted		Lance Wiggins	Landmark Planning

<p>I agree that development in employment areas should "maximise job outputs and (be) compatible with the character and function of the area and with other nearby uses and policies in this Local Plan."</p> <p>I have my doubts that this will be the case when Planners are put under pressure by Landlords more interested in maximising their revenue than maintaining established jobs in my town.</p> <p>For example, would the Planners be able to act if a Landlord chose to evict an established transport haulage firm from a site so they could build a multi-occupier shed whose tenants would bring in more income to the Landlord? What if the promised jobs in the new shed were likely to be fewer in number, quality and security compared to those associated with the company being levered out?</p>	<p>A landlord or owner has the right to seek to redevelop a site for another use from that currently in place. This will be based upon a range of considerations, including achieving a suitable rate of return for their investment. This is a decision for the owner and is not a planning consideration. The role of planning is to consider the suitability of the proposed use.</p> <p>Any decision made by a landlord is between them and the tenant subject to it being consistent with other, non planning, legal requirements.</p>		Theresa Eynon	alderoak
Yes	Noted		Mr. j Lewis	1950
Yes	Noted		Steve Johnson	YYYY
Yes	Noted		Lesley Birtwistle	not applicable
Yes	Noted		Mrs Paula Ashfield	Paula Ashfield
WYG, on behalf of TNT UK Limited, have provided a separate detailed response in relation to this and with particular reference to the TNT's Lount Hub.	Noted		Nick Bowden	WYG
Yes	Noted		Tim Abbott	Householder
<p>But, remember, the bus service is near to useless for most residents and does not cover the key employment locations therefore forcing more and more people to have to use the car. Further, the reliance on warehousing for work provision is adding to the lorries on our road who clog up junctions etc. very quickly during rush hour as they cannot pull out when loaded. This causes serious problems for through traffic.</p>	<p>The primary employment areas have been assessed as part of the 'Assessment of Employment Sites 2010' the assessment looked at the following: This looked at sites in terms of a number of factors to assess whether the sites continued to meet market requirements:</p> <ul style="list-style-type: none"> • accessibility by road, • accessibility by public transport, • external environment and • internal environment <p>The majority of primary employment areas are well served by public transport.</p>		Jane Tebbatt	Quarrying
Yes	Noted		Heather Parish Council	Heather Parish Council
Yes	Noted		JON WALTERS	LPT
<p>Primary Employment Areas have been identified against the context of NPPF requirements (to release failing employment land) on the basis of findings from a qualitative assessment of employment sites carried out in 2010. Whilst this study was carried out some time ago, unless specific and targeted investment has been directed towards the failing sites identified at the time, the</p>	<p>Noted. It is agreed that Policy Ec3(1) be amended to take account of other Local Plan policies and the impact upon supporting infrastructure .</p>	<p>EC3 (1) to be amended to take account of other relevant local plan policies and infrastructure requirements that will need to be considered as part of determining a planning application.</p>	Andrew Johnson	Erewash Borough Council

<p>findings should remain relevant and a reasonable basis upon which to help identify the Primary Employment Areas. Ec3(3) appropriately allows for the further release of employment land which no longer fulfils its purpose. The policy recognises that some of these areas are not completed. Ec3(1) therefore seeks to condition the basis on which planning permission will be granted and, whilst this forms a good basis for planning applications to be considered against, it may be appropriate to more precisely reference impacts on infrastructure, and potentially other policy areas and topics of the Local Plan. Currently the policy reads as though only the 'general environment' and 'amenity of nearby residents' need be considered as part of any applications for further employment development within the identified areas. Erewash is particularly interested in this being considered against the context of Ec3 areas identified at Kegworth ad Castle Donington, given their geographical proximity to the Borough and likely cumulative impacts on infrastructure which interacts with the Borough.</p>				
<p>Yes</p>	<p>Noted.</p>		<p>Alison Saxby</p>	<p>N/A</p>
<p>KPC has reservations about further proliferation of B8 sites across the area replacing other types of employment land. The area already has a fragile transport system, which readily grinds to a halt due to the convergence of so many major routes and the lack of an integrated public transport network. This situation will only degrade with further B8 sites granted, and the potential Roxhill development should persuade the Council to avoid any further B8 developments.</p>	<p>The draft policy is aimed at protecting good employment sites from being changed to other uses, B1 and B2 sites of up to 500m2 do not require planning permission to change to B8. However any sites that are larger than this will require planning permission to change to B8. The Local Plan cannot rule out any further B8 developments to the north of the district, as each planning application needs to be determined on its own merits.</p> <p>It should be noted that Roxhill is a national infrastructure project and therefore is outside the remit of the Local Plan.</p>		<p>Vicky Roe</p>	<p>Kegworth Parish Council</p>
<p>(a) Past behaviour is a good predictor of future behaviour. Permissions given for employment use in Ellistown clearly show that the statement re neighbour inconvenience in proposed policy Ec3 is not worth the paper it is written on.</p> <p>(b) Draft policy Ec3 4) Any further B8 development should NOT be allowed on Ashby Business Park. This needs to be reserved for high quality offices. There are plenty of warehousing site already allocated. This policy would lead to degradation of the site and a loss of attractiveness to high added value, highly paying white collar employers.</p>	<p>(a)The impact upon amenity and environment was considered in determining the planning application.</p> <p>(b)Ashby Business Park has been assessed as part of a study carried out by Roger Tym and partners to asses if employment sites continued to meet the market requirements. The study concludes that for Ashby Business Park a small amount of B8 should be allowed to the rear of the site.</p>		<p>Sue McKendrick</p>	<p>Labour Group leader</p>

<p>We support the generally permissive approach to employment and non-employment development in “other” employment areas under the provisions of Policy Ec3. However, the requirement to demonstrate vacancy for at least 6 months and a marketing exercise for at least that period of time goes beyond the advice in the National Planning Policy Framework and should be deleted. Further clarification is also needed as to whether each of the criteria (a) – (c) needs to be satisfied or whether compliance with one (or more) is sufficient to satisfy the policy.</p> <p>Policy Ec3 should be reworded to clarify that it’s permissive approach applies to proposals for development in (unidentified) existing employment sites outside Limits to Development as well as those within given the need to context provided by Policies S2, S3 and S4.</p>	<p>The NPPF states "that Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities". The Local Plan is therefore not in conflict with the NPPF. It would be inappropriate to relate this policy to unidentified sites outside of the Limits to Development, as the Local Plan should be read as a whole.</p> <p>In terms of Ec3 a to c only one of these needs to be satisfied. The policy will be amended accordingly to make this clear.</p>	<p>Amend Ec(3) to make clear that only one of a to c have to be satisfied.</p>	<p>Andrew Thomas</p>	<p>Thomas Taylor Planning</p>
<p>I agree that development in employment areas should "maximise job outputs and (be) compatible with the character and function of the area and with other nearby uses and policies in this Local Plan."</p> <p>I have my doubts that this will be the case when Planners are put under pressure by Landlords more interested in maximising their revenue than maintaining established jobs in my town.</p> <p>For example, would the Planners be able to act if a Landlord chose to evict an established transport haulage firm from a site so they could build a multi-occupier shed whose tenants would bring in more income to the Landlord? What if the promised jobs in the new shed were likely to be fewer in number, quality and security compared to those associate with the company being levered out?</p>	<p>Any changes to the use of a site that require planning permission will need to be assessed on their own merits, changes that do not require planning permission, is not something that the local planning authority can control.</p> <p>A landlord or owner has the right to seek to redevelop a site for another use from that currently in place. This will be based upon a range of considerations, including achieving a suitable rate of return for their investment. This is a decision for the owner and is not a planning consideration. The role of planning is to consider the suitability of the proposed use.</p> <p>Any decision made by a landlord is between them and the tenant subject to it being consistent with other, non planning, legal requirements.</p>		<p>Mrs Kurpil</p>	<p>NA</p>
<p>Frontages of development site at ashby business park should restrict adjoining Nottingham road also.</p>	<p>Any proposals will need to be determined at detail planning application stage.</p>		<p>C Tandy</p>	<p>Ashby de la Zouch Civic Society</p>

<p>The site is located to the east of Ashby de la Zouch. The site covers an area of approximately 1.25 hectares (3 acres) and currently comprises predominantly unmanaged grassland and shrubbery, with patches of scrub and a scattering of trees. Construction is underway to deliver the access road following the grant of planning permission (ref. 15/00278/FULM) in July 2015.</p> <p>Outline planning permission was granted in 1994 (ref. 93/0284) for the development of Ashby Business Park, comprising Class B1 and B2 uses. Divided into numerous plots, the majority of Ashby Business Park has now been built out with the site remaining one of the few undeveloped parcels of land covered by the original 1994 permission. Other vacant parcels of land are located to the south west corner of Ashby Business Park.</p> <p>Consistent with the 1994 permission, the North West Leicestershire Local Plan (August 2002) Proposals Map currently identifies the site as falling within the settlement boundary of Ashby de la Zouch, known as 'limits to development', and a 'High Quality Employment Site' at Flagstaff (Policy J5). It is noted that whilst the allocation at Flagstaff Interchange has been saved, Policy J10 which sought to prevent alternative forms of development on the employment area specified in Policy J5, has expired. Moreover, the wider context of this employment allocation under Policy 4: Employment of the Leicestershire, Leicester and Rutland Structure Plan 1991-2006 (March 2005) has since expired, replaced by the East Midlands Regional Plan which itself was revoked in April 2013. There is therefore no saved policy in the adopted development plan to safeguard this strategic employment site from alternative forms of development.</p> <p>The development of the majority of Ashby Business Park has now come forward for a mixture of uses, including those traditionally considered employment uses (i.e. Classes B1, B2 and B8 of the Town and Country Planning (Use Classes) Order 1987 (as amended)). However, the site has remained an exception to the wider development of the Ashby Business Park and remained vacant</p>	<p>The potential for the site to accommodate other employment uses is covered by policy Ec3(2) and non employment development Ec3 (3).</p>		Rhys Govier	Savills
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with no employment development forthcoming in over 20 years. Paragraph 7.32 of the draft Local Plan recognises and accepts “development commenced in the 1990’s but in recent years there has been limited progress in developing the remainder of the site”. This is despite the site’s prominent corner plot location fronting the Ashby Business Park and genuine efforts by past and present owners to attract typical employment uses.

While there has been a continued lack of interest in the site for typical employment uses, recent years has seen strong interest in the site from operators of other uses, namely retail, hotel, food and drink and leisure operators. These uses, which are employment generating in their own right, demonstrate positive market signals with a commitment to deliver being expressed through current and imminent planning applications for the various parcels of the site.

Draft Local Plan

The draft Local Plan and supporting Proposals Map proposes the continued allocation of the site for employment purposes. Under Policy EC3: Existing Employment Areas, it is proposed to include the site within the wider Ashby Business Park allocation as a ‘Primary Employment Area’.

While Conygar raise no objection to the objective of Policy EC3 per se, or the allocation of the remainder of the Ashby Business Park under this policy, we strongly object to the inclusion of the site within the Primary Employment Area and respectfully request the site be excluded from this allocation.

The justification for the removal of the site from this allocation is best considered in the context of the guidance provided by national planning policy in respect of employment sites. Paragraph 22 of the National Planning Policy Framework (NPPF) (March 2012) notes, in full:

“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no

<p>reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”</p> <p>From this paragraph, three important areas of consideration for the removal of the allocation emerge, being:</p> <p>§ Avoiding the long term protection of sites;</p> <p>§ Regular review of land allocations; and</p> <p>§ Alternative uses should be treated on their merits having regard to market signals.</p> <p>These matters, in the context of the site, are considered in the following paragraphs.</p> <p>Avoiding the long term protection of sites</p> <p>As previously mentioned, the site has had the benefit of both a planning policy allocation and an earlier planning permission for over 20 years with no development forthcoming. This is considered a substantial period of time for typical employment uses to be forthcoming, the conclusion being that there is no reasonable prospect of the site being used for these typical employment uses in the foreseeable future</p> <p>The continued protection of the site would therefore be contrary to paragraph 22 of the NPPF.</p> <p>Regular review of land allocations</p> <p>It appears the Council’s evidence base and most recent assessment of the site through the Assessment of Employment Sites: Final Report (Roger Tym & Partners, August 2010), undertaken over five years ago. Paragraph 7.32 of the draft Local Plan indicates that this assessment of employment sites noted that:</p> <p>“Whilst the [Ashby Business Park] site should continue to be protected for employment use that it would be appropriate to consider allowing some B8 development to the rear of the site so as to add value to the site.”¹</p>				
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<p>We question the reliability of the 2010 assessment and the recommendation that the whole of Ashby Business Park should be retained for employment uses. While this may have been the case five years ago, the assessment is now considered significantly dated, pre-dating the publication of the NPPF and the market signals which have, and continue to be, demonstrated to Conygar since its acquisition of the site in 2012.</p> <p>Given the age of what is understood to be the most recent assessment of the site by the Council, the continued protection of the site would therefore be contrary to paragraph 22 of the NPPF in that a regular review of the site, and therefore the merits of its retention as an employment site, has not been undertaken.</p> <p>Alternative uses should be treated on their merits having regard to market signals</p> <p>Paragraph 22 of the NPPF is also clear in that it emphasises the importance of alternative uses being considered through market signals and sustainable local communities. As demonstrated by the long term undeveloped nature of the site, typical employment uses have not been forthcoming but there is clear market interest and potential development opportunities in the site's development for a number of alternative uses suited to its location. For example, the Council is currently considering a full planning application (ref. 15/01048/FUL) by Mitchell & Butler to deliver a Toby Carvery restaurant on a parcel of the site. Discussions are in advanced stages with a national food retailer for another part of the site which will be progressed to a full planning application within the coming months. In this context, it is clear there are strong market signals for the development of the site for alternative appropriate uses, which should be considered favourably in the context of paragraph 22 of the NPPF. Such alternative uses also have the potential to generate a significant number of local jobs, while providing for complementary services to other uses within Ashby Business Park and the wider town.</p> <p>Proposed Amendments</p> <p>For the plan to be found sound through its</p>				
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<p>consistency with national planning policy, Conygar respectfully request the site be removed from the wider allocation of Ashby Business Park as a 'Primary Employment Area'. This change is shown on the enclosure.</p> <p>Conygar instead recommend the site to be identified as an area of opportunity for the delivery of a mixed use development. Suitable uses that could be promoted as part of this mixed use allocation include retail, hotel, food and drink and leisure operators. Such uses, although not falling within the typical Class B employment uses, would offer important employment opportunities and are considered offer better prospects of delivery compared to the lack of development on the site over the past 20 years.</p> <p>Conclusion</p> <p>The site has been identified for traditional employment uses for over 20 years, with no development forthcoming. Considering this long term identification but lack of delivery, Conygar strongly object to the inclusion of the Ashby Gateway site within the 'Primary Employment Area' of the wider Ashby Business Park, as allocated under Policy EC3 of the draft Local Plan. It is considered the Council's evidence base for the employment sites is out of date, and does not reflect policy or market signal changes which have occurred since the assessment of the site was undertaken in 2010. The proposed continued allocation of this site for employment uses in the draft Local Plan is therefore clearly contrary to paragraph 22 of the NPPF and should therefore be removed to be found sound.</p> <p>I would welcome the opportunity to discuss the above, but in the meantime should you have any queries, please do not hesitate to contact me.</p>				
<p>Pegasus Business Park has extant planning permission for business park development. Commercial development proposals will be brought forward for land within Pegasus Business Park, in accordance with the approach set out in the Airport's Land Use Plan. The requirement for land outside the existing Airport boundary will be kept under review.</p>	<p>Noted.</p>		<p>Jon Bottomley</p>	<p>East Midlands Airport</p>

<p>Ec3 (Existing employment areas) – as currently worded, this policy would make it difficult for waste facilities to be located within industrial locations.</p> <p>Policy Ec3. Government guidance states industrial sites should be considered for the location of new waste facilities and the adopted and emerging Waste Core Strategy/Local Plan seeks industrial locations over greenfield for many development types. This draft policy would place an unacceptable requirement on waste operators (for example waiting 6 months for the site to remain vacant). The policy would be acceptable if it was accepted that waste management is similar to B2 and B8 uses and as such it would not be classed as a non-employment use.</p> <p>The rationale behind the assessment of employment land needs is welcomed. The approach in Policy Ec3 is supported. In particular Ec3 (3) where the policy could be widened to include circumstances where the site is no longer economically viable in addition to being held vacant over a specified period.</p>	<p>Noted amend EC3 (3) (a) to include viability. A number of waste facilities are covered by Use Class Order B2 and Sui Generis waste facilities are covered by policy Ec3(2).</p>	<p>EC3 (3) (a) to be amended to include viability.</p>	<p>Sharon Wiggins</p>	<p>Leicestershire County Council</p>
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<p>The subject site is located within the open countryside and is located outside of any established settlement boundary or employment allocation within the replacement Local Plan. The proposed replacement Plan does not allocate the site as being suitable for further expansion as this would appear to conflict with general policies of rural restraint. This allocation would disrupt TNTs growth plans and consequently undermine the long term viability of the Lount distribution hub.</p> <p>It is recognised that the site is not located in the most sustainable location and is not typically a use that is compatible with the general rural nature of the area. However, the site represents an existing facility that is an important local employer. The site's location is of an overriding significance in this particular case as:</p> <ul style="list-style-type: none"> · It forms one of the three midlands based national hubs for the distribution network; · It is an essential component in TNTs network that requires a high degree of operational redundancy; and · It is an established site that TNT have control over. <p>As has been noted above, the site benefits from excellent access to the national road network. Although it is not located on the strategic motorway network it is nevertheless next to the significant strategic A42. The site is broadly located within the centre of the UK giving easy access to all parts of the UK.</p>	<p>The expansion of employment sites into the open countryside is covered by draft Local Plan policy S4.</p>		<p>Nick Bowden</p>	<p>WYG Environment Planning Transport Limited</p>
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<p>I agree that development in employment areas should "maximise job outputs and (be) compatible with the character and function of the area and with other nearby uses and policies in this Local Plan."</p> <p>I have my doubts that this will be the case when Planners are put under pressure by Landlords more interested in maximising their revenue than maintaining established jobs in my town.</p> <p>For example, would the Planners be able to act if a Landlord chose to evict an established transport haulage firm from a site so they could build a multi-occupier shed whose tenants would bring in more income to the Landlord? What if the promised jobs in the new shed were likely to be fewer in number, quality and security compared to those associated with the company being levered out?</p>	<p>A landlord or owner has the right to seek to redevelop a site for another use from that currently in place. This will be based upon a range of considerations, including achieving a suitable rate of return for their investment. This is a decision for the owner and is not a planning consideration. The role of planning is to consider the suitability of the proposed use.</p> <p>Any decision made by a landlord is between them and the tenant subject to it being consistent with other, none planning, legal requirements.</p>		Mr B Carter	n/a
Yes	Noted.		Mrs. A Saxby	n/a
Yes?	Noted.		Fiona Palmer, Clerk to the Parish Council	Castle Donington Parish Council

Policy Ec5: East Midlands Airport

Question 21 Do you agree with our suggested approach in respect of East Midlands Airport? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes	Noted.		L Marron	Resident
Yes	Noted.		Mr s Whitehouse	Personal
Yes	Noted.		N Garnham	Packington Nook Residents Association
<p>I refer specifically to the fields south of the A453 now owned by the Airport.</p> <p>I note that in the Land Use Section of the Airports Sustainable Development Plan 2015 (Pages 33 & 37) land south of the Pegasus Business Park south of the A453 & to the west of the Moto Service Area has been identified as potential Employment Land in the NWL Employment Land Availability Assessment 2013 & that the Airport's land requirements outside the existing operational area will be kept under review by the Airport.</p> <p>This land is currently classified as Countryside & has not been confirmed as Employment Land. My understanding is that the Council has to set long term targets for the amount of new Employment Land it aims to provide & it keeps a data base of such land.I firmly believe these fields should remain classified as Countryside & would object strongly to them being reclassified as Employment Land & being included as such in the New Core Strategy Local Plan which will be available in 2016.</p> <p>Section 7.49 Page 66 of your Draft Plan states - ' The Aviation Policy Framework requires that land outside existing airports that may be required for airport development in the future needs to be protected against incompatible development until the Government has established any relevant policies & proposals in response to the findings of the Airport Commission.'</p> <p>In my view any development south of the A453 would have a profound & adverse impact on the Conservation village of Diseworth & will be resisted strongly by the village.</p>	<p>Noted. The draft Local Plan identifies this land as countryside and it is not proposed to allocate this land for employment in the draft plan.</p>		I K Robertson	resident

Please note that East Leake Parish Council have an on going issue with public transport from the airport has a lot of residents work at the airport and there is no direct bus service for them to get there.	Noted. The policy seeks to ensure that any future development improves public transport.		East Leake Parish Council	East Leake Parish Council
Yes	Noted.		M.Chadbourn	Emerald Eye Ltd
Yes	Noted.		A. Wright	Heather Parish Council
<p>pg 62 para 7.43. We are pleased to see that "there are no plans for the development of a second runway ..."</p> <p>para 7.45 the draft local plan records that "there are no restrictions on night flights". Because "the current noise climate at night is unacceptable ", the District Council should continue to ask the Government to introduce restrictions on night flights.</p> <p>7.46 A direct rail link with the East Midlands parkway train station would be advantageous, even if crossing the M1 would be challenging exercise. That the proposed HS2 should not stop at the East Midlands Airport is absurd.</p>	Noted. As part of the approval of the planning application to extend the airports runway, the airport entered into an agreement that details the provisions of a Sound Insulation Grant Scheme for local communities. In addition the planning consent for the runway development includes a condition that an Environmental Management Plan be agreed that sets out the airports environmental controls, mitigation measures and the extent of the airports nigh noise contour. The policy also seeks as part of new development to improve public transport links.		G.Dalby	NA
<p>East Midlands Airport. Item 1 b)</p> <p>With this comment in mind why have the authority approved the largest development in the Castle Donington area parallel to the flight path? This development will cause huge issues with the future security of the Airport business. This is like Hinckley and Bosworth's approval of housing right next to the Mallory Park circuit which has closed the circuit once and limited its operation where its continued existence is in serious doubt.</p>	Roxhill is a national infrastructure and the proposal is not determined by the district council. As part of the planning process East Midlands Airport will have been consulted.		S.Palmer	NA
<p>Then we have East Midlands Airport – As pressure mounts on the London airports the use of this facility is bound to increase. Whilst there may be no plans at present, development should be avoided in the arc where any potential extension would be made. There is no point stirring up problems for the future.</p> <p>We should hear shortly whether the new transport hub near the airport is to go ahead and if so, this will also increase the already considerable freight traffic from this airport and consideration of the noise impacts along the flight paths should also form part of deliberations as to where new housing should go. If it is a case of either / or, then this flight path would be more suitable for commercial</p>	Noted. There are no plans for the development of a second runway but the airport does have permission for a runway extension.		T. Kirby	Chairman local access forum

development.				
Agree. The Parish Council is concerned that there should be no development or any expansion of EMA south of the A453.	Noted.		Samantha Lockwood	Long Whatton and Diseworth Parish Council
Expand it with more routes.	Noted.		None	none
Yes	Noted.		David Harris	Pyrotect Ltd
The Town Council supports the intention of improving public transport access to the airport and reiterates a view already expressed to the Airport that existing public transport links need to be extended to include Ashby.	Noted.		Karen Edwards, Deputy Town Clerk	Ashby de la Zouch Town Council
Yes	Noted.		Andrew Stone	NA
Yes	Noted.		Trevor Davis	None
Yes	Noted.		Measham Parish Council	Measham Parish Council
Allow open expansion and increase employment opportunities.	The draft policy seeks to strike a balance between supporting economic growth and protecting the environment.		Edward Hines	N/A
Yes	Noted.		David Bigby	Private individual
As part of HS2 the Midland mainline should be linked to the airport / enterprise zone	It is not the role of the Local Plan to define the route of HS2. An announcement on the route of HS2 is due to be announced in Autumn 2016.		Paul McCaffrey	NA
<p>The policy relates to the defined boundary of East Midlands Airport which includes Pegasus Business Park although there is no specific mention of this in the Policy. The supporting text refers to the councils support to the Airports growth plans which include the desire to;</p> <p>‘bring forward commercial development proposals associated with the airport, including offices, logistics, general warehousing and hotels at Pegasus Business Park.’</p> <p>The absence of any specific reference to Pegasus Business Park and the wider East Midlands Enterprise Gateway (EMEG) in the policy seems to be disproportionate to the strategy for future economic growth.</p> <p>Based on the historic policy basis and implemented permission for a petrol filling station and motorist’s restaurant it is considered the East of Finger Farm site should be included in the Primary Employment Area and East Midlands Airport Boundary.</p> <p>Background Paper 8 provides more information on policies Ec5, Ec6 and Ec7 which relate to East Midlands Airport. Paragraph 15.1 refers to the LLEP</p>	<p>The District Council is working with the LLEP and a range of organisations to deliver the East Midlands Enterprise Gateway. The protection of Pegasus Business park is covered elsewhere within the Local Plan. The inclusion of Finger Farm is not included within the airport boundary or within the airport masterplan and so it would not be appropriate to include it within the airport boundary as part of the Local Plan . The District Council has met its employment land requirements through the plan period, in accordance with the settlement there is therefore no requirement to allocate any further land.</p>	<p>A statement to be included the role of the Local Planning Authority working with the LLEP and a range of organisation to deliver the East Midlands Enterprise Gateway.</p>	Jeremy Williams	ID Planning

<p>and in particular the Strategic Economic Plan. The EMEG area is identified as a priority growth area, the document states:</p> <p>“EMEG is centred around East Midlands Airport, within the boundaries created by the M1 to the east, with the A40 and A42 to the north and south. The airport is seen as one of the businesses driving growth in the area.”</p> <p>The exclusion of the site (East of Finger Farm) suggests that the Local Plan is unsound as the proposed plan is not currently positively prepared or justified based on the evidence which clearly suggests that that the employment growth area is bounded by the M1 to the east.</p> <p>The allocation of the site would provide an employment site of 1.5ha which would support the hierarchy we have proposed and would make the plan sound by ensuring the Plan complies with paragraph 160 of NPPF by supporting the LEP Strategic Economic Plan. The proximity of the site to the airport suggests that its inclusion will take in the current allocation for road related service facilities as reflected by the implemented development but would also ensure that development of the site is compatible with the airport uses and the wider growth strategy. The M1 to the east and roundabout junction to the south of the site form strong and permanent boundaries to the airport to restrict ribbon development in the countryside in accordance with Policy S4, part (c).</p>				
Yes	Noted.		Lance Wiggins	Landmark Planning
Yes	Noted.		Mr. j Lewis	1950
Yes	Noted.		Steve Johnson	YYYY
Yes	Noted.		Lesley Birtwistle	not applicable
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Hugh James	n/a
Yes	Noted.		Tim Abbott	Householder

<p>As already outlined.</p> <p>EMA must not be allowed to continue flying at night. The noise is horrendous and we have the least strict rules in the country.</p> <p>Please address for residents' wellbeing.</p>	<p>There are no restrictions on night flights although the district council has previously asked Government to introduce restrictions. We consider the current noise climate at night to be unacceptable and better noise protection to local residents is required, particularly for those living in areas above noise thresholds who would suffer sleep disruption at night. As part of the approval of the planning application to extend the airports runway, the airport entered into an agreement that details the provisions of a Sound Insulation Grant Scheme for local communities. In addition the planning consent for the runway development includes a condition that an Environmental Management Plan be agreed that sets out the airports environmental controls, mitigation measures and the extent of the airports night noise contour. The District Council will continue to lobby the issue of night time noise, but this is outside the remit of the Local Plan.</p>		Jane Tebbatt	Quarrying
Yes	Noted.		Heather Parish Council	Heather Parish Council
No	Noted.		JON WALTERS	LPT
<p>We support the approach taken by NWLDC in seeking to support growth at East Midlands airport whilst balancing the need for minimising the aggravation of environmental nuisances associated with its activity. The airport is a national asset and has the potential to foster significant economic growth in the region. Populations in the south of Erewash benefit from being located close by and it is a potent source of employment both in industries relating directly to air travel and movement and in the wider distribution related industries for populations within Erewash. As is recognised within Policy Ec5 however, the growth of the airport must be proportionately balanced alongside related environmental concerns, particularly in relation to noise and air quality. Erewash is of the view that the policy appears to strike a reasonable balance between these issues.</p>	Noted.		Andrew Johnson	Erewash Borough Council
<p>needs tighter noise footprint controls, particularly at night.</p>	<p>As part of the approval of the planning application to extend the airports runway, the airport entered into an agreement that details the provision of a Sound Insulation Grant Scheme for local communities. In addition the planning consent for the runway development includes a condition that an Environmental Management Plan be agreed that sets out the airports environmental controls, mitigation measures and the extent of the airports night noise contour.</p>		George F Stapley	NA
Yes	Noted.		Alison Saxby	N/A

<p>No. In 'Policy Ec5: East Midlands Airport', part (c), it would be preferable to incorporate measures to ensure that local air quality remains above the relevant standards not below as currently stated. KPC would ask that NWLDC negotiate a ban on night time flights, as there are no restrictions currently, and to support augmentation of the scheme to provide home insulation to existing premises, as there is currently a 5 year waiting list. In addition KPC consider that NWLDC should be proactive in supporting better passenger transport links to East Midlands Parkway and EMA to cope with the increased capacity.</p>	<p>Agreed part 1 (c) needs to be amended to make it clearer that air quality standards should not get any worse than they currently are by meeting the appropriate standards.</p> <p>The District Council has asked Government to introduce restrictions as we consider the noise climate at night to be unacceptable and better noise protection to local residents is required, particularly for those living in areas above noise thresholds who would suffer sleep disruption.</p> <p>In addition to the Sound Insulation Grant Scheme, the planning consent for the extension to the runway includes the condition that an Environmental Management Plan be agreed that sets out the airports environmental controls, mitigation measures and the extent of the airports night noise contour.</p> <p>The District Council will continue to lobby on the impact of night time flight noise, however this is outside the remit of the local plan.</p> <p>The District Council is currently working with a number of organisations to help improve access to the airport, as a result of partnership working a bus service has recently been implemented between Coalville and the airport.</p>	<p>Amend Ec5(1)(c) policy to state that Air Quality Standards satisfies the relevant standards</p>	<p>Vicky Roe</p>	<p>Kegworth Parish Council</p>
<p>(a) Disappointed that there is no discussion or question on the so called 'East Midlands Enterprise Gateway'. The unelected and unaccountable zoning needs to be scrutinised by Elected Members to ensure the benefit is to local communities.</p> <p>(b) In principle the Labour Group supports the comments shown in proposed policy Ec5</p> <p>(c) But Secretary of State announcements on HS2 and ROXHILL may determine a different approach to airport development.</p> <p>(d) Subject to noise controls the Labour Group would be prepared to consider a stronger future passenger development at EMA. With a small Capital cost a rail link could be accommodated at EMA to meet additional demand for air transport from the south east of England.</p> <p>(e) The Labour Group strongly support a growth bid to extend the Nottingham Tram to EMA.</p>	<p>Note. The East Midlands Enterprise Gateway is discussed at para 7.5</p>	<p>A statement to be included the role of the Local Planning Authority working with the LLEP and a range of organisation to deliver the East Midlands Enterprise Gateway.</p>	<p>Sue McKendrick</p>	<p>Labour Group leader</p>
<p>For major employment site public transport links required to Ashby.</p>	<p>Noted.</p>		<p>C Tandy</p>	<p>Ashby de la Zouch Civic Society</p>

<p>Recognising the impacts of airport noise on the wider landscape, we request the following change to Policy EC5:</p> <p>“(b) incorporates measures that will reduce the number of local residents affected by noise as a result of the airport’s operation as well as the impact of noise on the wider landscape;”</p>	<p>Noted, amend policy to reflect the impact of noise on both residents and the wider area.</p>	<p>Amend Ec5(1)(b) to reflect the impacts of noise from the airport on both residents and the wider area.</p>	<p>Kim Miller</p>	<p>National Trust</p>
<p>East Midlands Airport is a significant UK airport and a nationally significant cargo handling airport, second only to London Heathrow. The airport site and its immediate area is an important economic asset and employment are for the District and is the largest single employment site in Leicestershire. It is therefore important that the Airport's existing and forecast economic and employment contribution to the district is reflected and enabled in the Local Plan. Leicestershire and North West Leicestershire have ambitions for future economic growth and development, these are included in the Leicester and Leicestershire Local Enterprise Partnership's Strategic Economic Plan (SEP). This identifies the Airport and its immediate area as a 'Growth Area' and the proposed Strategic Rail Freight Interchange as a 'Transformational Priority'. Although the SEP is not a statutory document, it provides background, context and ambition for development that should be recognised in the Local Plan.</p> <p>The District Council has developed his own growth plan that could also be referenced in the Local Plan, in particular its ambitions and the issues that it has identified. The Local Growth Plan includes priorities for the development of a Strategic Transport Plan; to facilitate development of the East Midlands Gateway; and to facilitate development of East Midlands Airport through local planning and wider infrastructure investment. The approach and priorities in the Local Growth Plan should be reflected and followed through in the planning policy that is set out in the Local Plan.</p> <p>Chapter 7 recognises the benefit of the international links provided by the Airport and identifies the concept of East Midlands Enterprise Gateway as a key feature the strategy for economic growth, this is supported. Promoting and developing the Airport and its surrounding area will be important for future economic and employment growth. The East Midlands Enterprise</p>	<p>It is not appropriate to include reference to the North West Leicestershire Local Growth Plan within the actual policy itself but the relationship between the Local Growth Plan and Local Plan is set out within the supporting text. It is considered that the existing wording of Ec5(1)(a) is appropriate and does not need to be amended to reflect the wording set out within the withdrawn Core Strategy. It would be appropriate to amend Part 2 of the policy to be to include reference to improvements to public transport and car parking at the airport. It would also be appropriate to make reference to development which requires and benefits from an airport location.</p>		<p>Jon Bottomley</p>	<p>East Midlands Airport</p>

<p>Gateway can provide unrivaled connectivity and drive investment that takes advantage of its locational, sector and infrastructure synergies. This is recognised in the Local Plan and strongly supported. Strategic policies should be put in place to realise this opportunity and should include provision for the growth of the Airport and for future development land as part of the East Midlands Enterprise Gateway area. The approach and future development of the Airport is set out in the 2015 Sustainable Development Plan which provides a valuable and up to date evidence-base for the Local Plan and its supporting documents.</p> <p>Welcome the recognition of the Airport as a 'nationally important asset'. Whilst not repeating national policy reference should be made to the Aviation Policy Framework (DfT 2013). The Aviation Policy Framework recommends that airport operators prepare master plans, the Airport's Sustainable Development Plan provides the up-to-date evidence base expected by the Aviation Policy Framework.</p> <p>The Local Plan recognises that planning consent is in place for an extension of the runway, it is the Airport's intention to formally commence and make a material start of the runway development in order to legally formalise the Airport's Sound Insulation Grant Scheme.</p> <p>The Airport recognises that there is an impact on the environment and communities that live close to the site. The Sustainable Development Plan identifies energy efficiency measures. Noise controls in place are consistent with the Government's aim set out in the Aviation Policy Framework 2013 and the impact of aircraft noise at night has reduced considerably over recent years. A noise envelope is in place at the Airport and has recently been amended and further controls the area affected by aircraft noise at night. The Airport has worked with local communities and the number of noise complaints have decreased as a result.</p> <p>Welcome the approach and encouragement of public transport links, the Airport will continue to work with the District Council and other key partners to develop public transport connections to the Airport and the wider East Midlands</p>				
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<p>Enterprise Gateway area.</p> <p>Policy would be more helpful if it followed the wording the Policy CE3 of the 2012 Core Strategy (Submission Version), for example. "The growth and development of East Midlands Airport will be supported up to that capable of handling 10 million passengers and 1.2 million tonnes of cargo per year having regard to its impact on local communities and the wider environment and the need to increase the number of employees and visitors traveling to the Airport by means other than the private car".</p> <p>Ec5 (2) should also include the development of public transport infrastructure and airport car parking. The development of ancillary infrastructure (d) should be amended to provide for development that requires and benefits from an airport location.</p>				
<p>Leicestershire County Council is also supporting work with NWL and other partners on ensuring transport links are in place to realise employment opportunities at East Midlands Enterprise Gateway.</p>	<p>Noted.</p>		<p>Sharon Wiggins</p>	<p>Leicestershire County Council</p>
<p>Yes</p>	<p>Noted</p>		<p>Mrs. A Saxby</p>	<p>n/a</p>
<p>WPL supports the commentary relating to the East Midlands Enterprise Gateway as set in Paragraphs 7. 36 to 7.60 recognizing that this part of the district is a "key part of our strategy for future economic growth."</p>	<p>Noted.</p>		<p>Jeremy Murfitt on behalf of Wheatcroft Properties Ltd and Donington Park Racing Ltd.</p>	<p>Wheatcroft Properties Ltd and Donington Park Racing Ltd.</p>
<p>Development south of the A453</p> <p>We have a particular concern with Policy Ec5 insofar as it relates to development of existing land outside the present boundaries of East Midlands Airport and which is situated to the south of the A453, bounded to the west by Mill Hill, to the east by the MOTO M.S.A. and to the south by the village of Diseworth.</p> <p>This land is presently designated as Countryside and is now owned by East Midlands Airport. It is, and always has been, used exclusively for agricultural purposes.</p> <p>The East Midlands Airport Sustainable Development Plan, 2015 [page 33] states that this land has been identified as 'potential employment land' within the NWLDC Employment Land Availability Assessment [2013].</p>	<p>Noted. The draft Local Plan identifies this land as countryside and it is not proposed to allocate this land for employment in the draft plan.</p>		<p>Jim Snee, Chairman WINGS</p>	<p>WINGS</p>

<p>It further states that it will keep this land under review for its land requirements 'outside the existing Operational Area'. In other words, East Midlands Airport is minded to expand its operation south of the A453.</p> <p>The present [Draft] Local Plan, under Policy Ec5 merely states [para 7.44] that:-</p> <p>'The Council wants to support these growth plans but needs to balance the economic benefits they will bring against their local impacts, particularly with regard to noise and transport.'</p> <p>Whilst noise and transport are certainly important, so also is land use.</p> <p>The text of the document makes no mention of policy for development outside the present airport boundary or south of the A453.</p> <p>Likewise, in the shaded summary section of Policy Ec5 [following on after para 7.48], much is made of what will be permitted, or not permitted, within the existing airport boundary. However, no guidance or restriction is implied, or made, for either development or restriction of development, outside the existing airport boundary.</p> <p>In the supporting documentation to the Draft Local Plan, 'Background Paper 8, Policy Ec5 East Midlands Airport', para 14.35 states:-</p> <p>'Land to the south of the Pegasus Business Park, south of the A453 and to the west of the Moto Service Area has been identified by the airport as potential employment land. The airport's land requirements outside the existing Operational Area will be kept under review'.</p> <p>The second sentence of this statement is of great concern.</p> <p>On the one hand, it implies that N.W.L.D.C are minded to allow this land to be commercially developed – subject only to review.</p> <p>On the other, it provides no protection for the northern fringe of Diseworth village nor for those residents whose quality of life, lifestyle and property will be most adversely affected.</p>				
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<p>This ambiguity is unacceptable.</p> <p>In summary, we are concerned that there is presently no clarity for any Planning Guidance to be made available in the new N.W.L.D.C. Local Plan for the present countryside land owned by East Midlands Airport and south of the A453.</p> <p>This omission should be rectified.</p> <p>Whilst East Midlands Airport is clearly of significant local economic and employment benefit it must be made clear in the Local Plan that it cannot presume to bulldoze it's aspirations across its local boundaries without constraint.</p> <p>Likewise, communities close to the airport have a right to expect that their lifestyles, their quality of life, privacy and their properties are properly protected from any perceived commercial encroachment.</p> <p>UK Aviation growth forecasts have consistently proved to have been over optimistic since 2001 and have been revised downwards [see para 7.41]. This trend is likely to continue.</p> <p>Given the present volume of land still available for development within the existing airport boundaries, there is no imperative for East Midlands Airport to expand beyond those boundaries within the next 15-20 years</p> <p>In respect of Question 21 [page 66] of the Draft Local Plan, our recommendation is as follows:-</p> <p>Clear guidance should be published within the Local Plan that reflects the above,</p> <p>i.e. :-</p> <p>Countryside south of the A453, for the duration of the new Local Plan, should remain unchanged and free from the threat of commercial development.</p>				
<p>The expansion of East Midland Airport is supported due to providing significant employment an jobs for residents of NWL.</p>	<p>Noted.</p>		<p>Phil Bamford</p>	<p>Gladman on behalf of Wilton Balmore.</p>
<p>Yes CDPC to forward its own Airport policy for consideration.</p>	<p>Noted</p>		<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

<p>There is no reference to heritage assets within policy Ec5. there are a number of heritage assets within the vicinity of the airport which are vulnerable to the effects of noise and disturbance, including numerous assets within Castle Donington, to the north the grade II* listed Donington Hall to the west and other assets within neighbouring authorities. We therefore again consider this is essential when setting out the general approach. An additional criteria within section (1) of policy Ec5 is suggested as follows:</p> <p>"e) Will protect and enhance heritage assets within the vicinity of the airport"</p> <p>we are disappointed that this issue has not been picked up as part of the SA.</p>	<p>Agree</p>	<p>Amend Policy to state "e) Will protect and enhance heritage assets within the vicinity of the airport"</p>	<p>Emilie Carr</p>	<p>Historic England</p>
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Policy Ec6: East Midlands Airport: Safeguarding

Question 22 Do you agree with our suggested approach in respect of safeguarding at East Midlands Airport? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes	Noted.		Lisa Marron	Resident
Yes	Noted.		Mr s Whitehouse	Personal
Yes	Noted.		Nigel Garnham	Packington Nook Residents Association
Yes	Noted.		Mark Chadbourn	Emerald Eye Ltd
Yes	Noted.		Alison Wright	Heather Parish Council
<p>pg 66, para 7.50 the draft local plan suggests that wind turbihnes "can interfere with radar navigation systems", but we note that the airport has already erected two wind turbines of its own.</p> <p>pg 67 para 7.52. In the 1970s when the planning application was submitted to re-establish motor racing at Donington park, an argument against such development was that aeroplanes took off and landed straight over the race circuit. There was serious concern for public safety. This concern remains and should be taken into consideration when any planning application is made by Donington Park Racing for development within any public safety zone.</p>	<p>Noted , the public safety zone will be taken into account when considering future applications made by Donington Park.</p> <p>In relation to the turbines, they are located on East Midlands Airport itself as these turbines do not impact on National Air Traffic Control.</p>		Gerald Dalby	NA
<p>To preserve the countryside around rural villages the Parish Council would like to see prohibition on development south of the A453. The Parish Council would also like to see that the land north of the airport remain as undeveloped and be preserved should the airport wish to expand in the future.</p>	<p>Noted. It is not proposed to allocate land south of the A453 in the local plan.</p>		Samantha Lockwood	Long Whatton and Diseworth Parish Council
Yes	Noted.		David Harris	Pyroprotect Ltd
Yes	Noted.		Andrew Stone	NA
Yes	Noted.		Trevor Davis	None
Yes	Noted.		Measham Parish Council	Measham Parish Council
<p>See previous comment and permit expansion within existing environmental limitations/guidelines</p>	<p>Noted.</p>		Edward Hines	N/A
Yes	Noted.		David Bigby	Private individual
Yes	Noted.		Lance Wiggins	Landmark Planning
Yes	Noted.		Mr. j Lewis	1950
Yes	Noted.		Steve Johnson	YYYY
<p>Essential to support the airport. Not sure how the Council can influence rail transport but it seems</p>	<p>Noted. It is outside the role of the Local Plan to identify a rail link to the airport as there is no evidence that one could</p>		Lesley Birtwistle	not applicable

shortsighted not to provide a rail link.	potentially be delivered.			
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Tim Abbott	Householder
Yes	Noted.		Jane Tebbatt	Quarrying
Yes	Noted.		Heather Parish Council	Heather Parish Council
No comment.	Noted.		JON WALTERS	LPT
Yes	Noted.		Alison Saxby	N/A
Yes	Noted.		Vicky Roe	Kegworth Parish Council
(a) Telecommunication and broadcast policy needs to be tested and scrutinised by other Regulatory Authorities such as OFCOM, MOD, Network Rail, and other users of large scale radar and broadcasting institutions. (b) In principle the Labour Group do not object to the other proposed safeguarding proposals.	Noted.		Sue McKendrick	Labour Group leader
No comment.	Noted.		C Tandy	Ashby de la Zouch Civic Society
Policy Ec5 Para. 7.42 (page 64) It is noted that East Midlands Airport's Sustainable Development Plan (2015) is referred to. The pertinent reference for me is Land Use. Para. 7.49 that refers to safeguarding land outside the existing Airport boundary. It is clear that East Midlands Airport, from its Development Plan, intend to use recently purchased land, south of the A453 if planning permission is granted. This, has been identified in the WINGS submission in this Consultation as being kept under review by NWLDC following East Midland Airport having identified it as 'potential employment land' I quote from the WINGS (2015) submission :- "In the supporting documentation to the Draft Local Plan, 'Background Paper 8, Policy Ec5 East Midlands Airport', para 14.35 states:- 'Land to the south of the Pegasus Business Park, south of the A453 and to the west of the Moto Service Area has been identified by the airport as potential employment land. The airport's land requirements outside the existing Operational Area will be kept under review'. The second sentence of this statement is of great concern. On the one hand, it implies that N.W.L.D.C are minded to allow this land to be commercially	Noted, land to the south of the A453 is designated as countryside in the local plan and not allocated for employment land. The area of land is covered by the safeguarding policy which protects the land from unsuitable development that would affect the safe operation of the airport. Paragraph 7.49, which is based on the Aviation Policy Framework, is confusing as it appears to suggest that land will be safeguarded for the future development of the airport. This is not the purpose of this policy and so the paragraph will be deleted.	Delete paragraph 7.49.	Alan Leech	N/a

<p>developed – subject only to review.</p> <p>On the other, it provides no protection for the northern fringe of Diseworth village nor for those residents whose properties and lifestyles will be most adversely affected.</p> <p>This ambiguity is unacceptable.”</p> <p>I wholeheartedly agree with this statement.</p>				
<p>This Policy is welcomed and supported. May wish to include a reference to national policy. In relation to development management areas in and around the Airport, the local plan should include a policy to restrict noise sensitive development in areas that are affected by aircraft noise. This could follow the approach set out in the 2012 Submission Version of the Core Strategy.</p>	<p>Noise in sensitive areas is covered by policy S5.</p>		<p>Jon Bottomley</p>	<p>East Midlands Airport</p>
<p>Yes</p>	<p>Noted</p>		<p>Mrs. A Saxby</p>	<p>n/a</p>
<p>Yes CDPC feel airport noise contours should be added to policy maps.</p>	<p>It would not be appropriate to include Noise Contours within the local plan policies map as they will change over time as aircrafts get quieter so the local plan could become out of date very quickly.</p>		<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

Policy Ec7: East Midlands Airport : Public safety Zones

Question 23 Do you agree with our suggested approach in respect of Public safety Zones at East Midlands Airport? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes	Noted.		Lisa Marron	Resident
Yes	Noted.		Mr s Whitehouse	Personal
Yes	Noted.		Nigel Garnham	Packington Nook Residents Association
Yes	Noted.		Mark Chadbourn	Emerald Eye Ltd
Yes	Noted.		Alison Wright	Heather Parish Council
NO COMMENT	Noted.		Samantha Lockwood	Long Whatton and Diseworth Parish Council
Yes	Noted.		David Harris	Pyroprotect Ltd
Yes	Noted.		Andrew Stone	NA
Yes	Noted.		Trevor Davis	None
Yes	Noted.		Measham Parish Council	Measham Parish Council
See previous comments	Noted.		Edward Hines	N/A
Yes	Noted.		Lance Wiggins	Landmark Planning
Yes	Noted.		Mr. j Lewis	1950
It appears an airport has a huge footprint.	Noted.		Steve Johnson	YYYY
Yes	Noted.		Lesley Birtwistle	not applicable
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Tim Abbott	Householder
Yes	Noted.		Jane Tebbatt	Quarrying
Yes	Noted.		Heather Parish Council	Heather Parish Council
Yes	Noted.		JON WALTERS	LPT
Yes	Noted.		Alison Saxby	N/A
Yes	Noted.		Vicky Roe	Kegworth Parish Council
In principle the Labour Group do not object to the other proposed Public Safety proposals.	Noted.		Sue McKendrick	Labour Group leader
The East Midlands Airport Public Safety Zones referred to in Policy Ec7 do not appear to be set out on the Policies Map.	Public Safety Zones are plotted on the policies map.		Andrew Thomas	Thomas Taylor Planning
No comment.	Noted.		C Tandy	Ashby de la Zouch Civic Society
This Policy is welcomed and supported. May wish to include a reference to national policy. In relation to development management areas in and around the Airport, the local plan should include a policy to restrict noise sensitive development in areas that are affected by aircraft noise. This could follow the approach set out in the 2012 Submission Version of the Core Strategy.	Noise in sensitive areas is covered by local plan policy S5.		Jon Bottomley	East Midlands Airport

Yes	Noted		Mrs. A Saxby	n/a
Yes	Noted.		Fiona Palmer, Clerk to the Parish Council	Castle Donington Parish Council

Policy Ec8: Donington Park

Question24 Do you agree with our suggested approach in respect of Donington Park? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes	Noted.		Lisa Marron	Resident
Yes	Noted.		Mr s Whitehouse	Personal
Yes	Noted.		Nigel Garnham	Packington Nook Residents Association
Yes	Noted.		Mark Chadbourn	Emerald Eye Ltd
Yes	Noted.		Alison Wright	Heather Parish Council
<p>The draft local plan would seem to be unreasonably sympathetic towards the development of the Donington Park racing circuit.</p> <p>On page 69 policy Ec8 , the plan states that "without income generation from other uses on site the circuit alone would not be viable".</p> <p>pg 54 para 7 Donington Park is described as one of a number of "major economic activities"</p> <p>On pg 63 para 7.37, the draft local plan states that " the planning system has an important role to play in delivering some aspects of the Enterprise gateway, for example future growth at East Midlands Airport and Donington Park".</p> <p>pg 58 para 7.22, in contrast, the draft local plan states that "additional employment " in the vicinity of Castle Donington " would represent an imbalance with housing provision in the locality".</p> <p>In recent years Donington Park, planning permission has been granted for a plant and machinery auction site, Norton motorcycles are assembled at Donington Hall, Donington Park Racing has applied for a 10ha extension to the west of the race circuit for industrial use associated with motor racing and the western paddock is to be used as the international headquarters for a new electrically powered global racing championship , FIA Formula E.</p> <p>Castle Donington Parish Council has supported developments associated with motor racing. However, the race circuit and surrounding area is beginning to be an industrial estate with motor</p>	<p>Noted. The noise from racetrack activity is controlled by the conditions contained in the current planning permissions for the racetrack, and a Noise Abatement Notice issued in 2010. These conditions allow Donington Park Racing to operate whilst limiting the number of events per year which are likely to give rise to local disturbance as well as limiting the duration of noisy events and limiting the noise produced by each individual vehicle during an event.</p>		Gerald Dalby	NA

<p>racing itself becoming a less important activity. The District Council should be cautious about Donington Parks racing assertion that ancillary industrial uses are necessary to ensure the commercial viability of the racing circuit. Of course, should racing and testing cease, those who live near the race circuit would be delighted to be spared noise from the race circuit!</p>				
<p>The same development to the west of Castle Donington being that much closer to the circuit will put the long term viability of the circuit into question. There will be significant issues with noise in the new development.</p>	<p>Noise issues were considered as part of determining the planning application.</p>		<p>Steve Palmer</p>	<p>NA</p>
<p>Yes</p>	<p>Noted.</p>		<p>Samantha Lockwood</p>	<p>Long Whatton and Diseworth Parish Council</p>
<p>No</p>	<p>Noted.</p>		<p>David Harris</p>	<p>Pyrotect Ltd</p>
<p>Yes</p>	<p>Noted.</p>		<p>Andrew Stone</p>	<p>NA</p>
<p>Yes</p>	<p>Noted.</p>		<p>Trevor Davis</p>	<p>None</p>
<p>Yes</p>	<p>Noted.</p>		<p>Measham Parish Council</p>	<p>Measham Parish Council</p>
<p>Yes</p>	<p>Noted.</p>		<p>Edward Hines</p>	<p>N/A</p>
<p>a rail link to Donnington / enterprise zone would also assist the race track for big events</p>	<p>Ec8 (1) (c) already requires public transport improvements as part of new developments.</p>		<p>Paul McCaffrey</p>	<p>NA</p>
<p>Yes</p>	<p>Noted.</p>		<p>Lance Wiggins</p>	<p>Landmark Planning</p>
<p>Yes</p>	<p>Noted.</p>		<p>Mr. j Lewis</p>	<p>1950</p>
<p>Yes</p>	<p>Noted.</p>		<p>Steve Johnson</p>	<p>YYYY</p>
<p>Donington Park is a valuable local asset which should be supported, subject to appropriate noise inhibiting measures.</p>	<p>Noted.</p>		<p>Lesley Birtwistle</p>	<p>not applicable</p>
<p>Yes</p>	<p>Noted.</p>		<p>Mrs Paula Ashfield</p>	<p>Paula Ashfield</p>
<p>Yes</p>	<p>Noted.</p>		<p>Hugh James</p>	<p>n/a</p>
<p>Welcome policy Ec8 1 c) & d) for public transport link improvements and conserving of heritage.</p>	<p>Noted.</p>		<p>Tim Abbott</p>	<p>Householder</p>
<p>Yes</p>	<p>Noted.</p>		<p>Jane Tebbatt</p>	<p>Quarrying</p>
<p>Yes</p>	<p>Noted.</p>		<p>Heather Parish Council</p>	<p>Heather Parish Council</p>
<p>Yes</p>	<p>Noted.</p>		<p>JON WALTERS</p>	<p>LPT</p>
<p>We support the approach taken by NWLDC in seeking to support growth at Donington Park, including west of, whilst balancing the need for minimising the aggravation of environmental nuisances associated with its activity including noise and also protecting and enhancing the site's racing heritage and parkland heritage. Donington Park is a significant asset and has the potential to foster significant but specialised economic growth in the region. Populations in the south of Erewash could benefit from being located close by – if not already. Ultimately the diversification of Donington</p>	<p>Noted. The policy will need to be amended to reflect the need to deliver public transport and measures to reduce any impact upon the local and strategic road network as part of any further development</p>	<p>Amend the policy to include reference to the need to improve public transport access to the racetrack and other measures that will reduce the impact of event traffic on the local and strategic road network.</p>	<p>Andrew Johnson</p>	<p>Erewash Borough Council</p>

<p>Park and land to the west will help ensure its retention and future enhancement which in turn could lead to significant economic growth to benefit the region as well as NWL.</p> <p>However, given that Donington Park already attracts significant numbers of visitors on event days, and that its diversification and the expansion of associated uses alongside is being proposed, it is important that any policy associated with its delivery recognises the likely impacts on local and regional infrastructure. Part 1 of Policy Ec8 makes provision for reducing the impact of event traffic on the local and strategic road network however Part 3 does not. The western extension to Donington Park will likely cumulatively lead to significant additional burden on at least the local road network. Erewash would consider it prudent to at least make mention of this within the policy itself, much like at Part 1, to ensure that any development to the west of Donington Park is informed by a balanced planning position.</p>				
Yes	Noted		Alison Saxby	N/A
No. As this is a national and international destination for racing and other events KPC considers that links to the East Midlands Parkway Station and airport should be proactively sought.	Ec8 (1) (c) requires public transport improvements as part of new developments. The District Council will continue to work the LLEP and a number of other organisations on the delivery of East Midlands Enterprise Gateway.	A statement will be inserted to regarding the District Council continuing to work with the LLEP and a number of other organisations on the delivery of East Midlands Enterprise Gateway.	Vicky Roe	Kegworth Parish Council
<p>(a) In principle the Labour Group will support proposed policy Ec8</p> <p>(b) However, we expect NWLDC to lead infrastructure improvements to enhance highways access on race days. Large events at the site lead to significant difficulties for residents to access Castle Donington & surrounding villages which must be resolved.</p> <p>(c) The above should be undertaken with NWLDC leadership in conjunction with ROXHILL, EMA and the LLEP</p>	The District Council will continue to work the LLEP and a number of other organisations on the delivery of East Midlands Enterprise Gateway.	A statement will be inserted to regarding the District Council continuing to work with the LLEP and a number of other organisations on the delivery of East Midlands Enterprise Gateway.	Sue McKendrick	Labour Group leader
No comment.	Noted.		C Tandy	Ashby de la Zouch Civic Society

<p>Recognising the impacts of noise on the wider landscape around Donington Park, including on the rural tranquillity of popular tourism/visitor attractions including Calke Abbey and Staunton Harold, we request the following change to Policy EC8 (1) (a):</p> <p>“(a) incorporates measures that will reduce the number of local residents affected by noise as a result of the racetrack’s operation as well as the impact of noise on the wider landscape;”</p>	<p>Noted amend policy to take account of the impact of noise generated by the racetrack on the wider area.</p>	<p>Amend EC8 (1) (a) to state "incorporates measures to reduce the impact of noise as a result of the racetracks operation on local residents and the wider area "</p>	<p>Kim Miller</p>	<p>National Trust</p>
<p>The extent of Policy Ec8 subject to this consultation includes the areas shown Described as “Policy Ec8” and shaded blue and “Policy Ec8 West” shown shaded green on Plan 11551-2/DPR/Local Plan. The extended policy area being Ec8 West was promoted by WPL during dialogue with NWLDC prior to the Consultation Draft being published. In addition to the western areas WPL are seeking the area described as Policy Ec8 East and shown shaded red on Plan 11558/DPR/Local to be included in the Policy for Donington Park.</p> <p>Paragraph 7.55 makes reference to various “vehicle related activities”. The activities listed are not sufficiently comprehensive, nor does it recognize long-established current activity.To reflect the range of established uses and activities DPR propose that this list is amended to read as follows;</p> <ul style="list-style-type: none"> • vehicle launches by car manufacturers • driver training for commercial vehicles, cars and motorbikes • various types of off-road and 4x4 use, including a purpose built 4x4 track • Operational centre for track day operators and • Use of the Western Paddock as the International Head Quarters for a new electrically powered global race championship - FIA Formula E. <p>Paragraph 7.56 describes other activities which take place at Donington Park which is not sufficiently comprehensive. The first sentence should be amended to read; “Other activities within the estate include a large long-term car park for East Midlands Airport, a plant and machinery</p>	<p>The boundary of Donington Park will be amended on the policies map to include the area currently shown as a western extension and also land east of the current designation , including the museum and the auction house. It is agreed to amend the paragraphs 7.55, 7.56 to update the supporting text with the current activities at Donington Park. The amendment suggested in respect of para 7.58 are not relevant to the local plan as this is about the viability of different aspects of the racetrack. It is agreed that transport with regard to particular events is well managed and this will be incorporated into the supporting text. It is proposed to amend the policy to create two sections (1) which relates specifically to the racetrack and (2) which is in relation to the Donington Park Estate. The policy currently discusses the Western Extension which already exists so will be covered by the Donington Park Estate section of the policy. The policy will include amendments to ensure that any future landscaping schemes do not have a detrimental impact on the safe operation of the airport. In addition, Ec8(2)(c) will be amended to incorporate reference to "automotive infrastructure".</p>	<p>Amend the Donington Park Site on the policies map to include additional land to the west and east. Amend para 7.55, 7.56 and 7.60 in accordance with the representation. Amend the policy so as to merge sections 2 and 3 in order for EC8 will have a section which relates solely to the racetrack and then the second part will refer only to the Donington Estate. Amendments proposed to part 2 (c) of the policy will be included within the re-drafting of the policy.</p>	<p>Jeremy Murfitt on behalf of Wheatcroft Properties Ltd and Donington Park Racing Ltd.</p>	<p>Wheatcroft Properties Ltd and Donington Park Racing Ltd.</p>

auction site and the Museum housing the Grand Prix as well as, now, the Wheatcroft Military Collections.”

Paragraph 7.57 describes the commercial importance of the Donington Park estate being conducted as one combined operation; and that income generated from non- motorsport activities is critical to its long term future. This paragraph goes on to state growth plans include a 10ha western extension to provide for motorsport development and related activities such as research. Key additional activities that also take place on site are at the eastern end of the property with areas occupied by the Engine House (formerly known as the Exhibition Centre), the plant and machinery auction site, the MAG long term airport car parking, the Museum, Circuit Office and adjoining land. These activities already have the appropriate planning permissions in place although noting that over the time period of the Local Plan the occupiers and uses may change. In light of the nature of this land i.e. comprising existing development, buildings and hard surfacing and to allow flexibility WPL wish to include this land in Policy Ec8.

Paragraph 7.58 introduces the need to balance economic benefits against local impacts particularly with regard to noise, transport and impact on heritage sites. This paragraph needs to be considered with regard to the wider Estate and not just the circuit. “Donington Park” as a whole is a viable entity, whilst the solus operation of the track in isolation is not. The circuit requires ongoing investment to maintain its racing licences and this investment has to be measured against a static and in some cases declining number of fee-paying participants and ticket-buying spectators. The Estate as a whole enables a wider range of activities and uses to take place and brings with it a number of key tenants who provide longer term occupation of the site. Whilst large parts of Donington Park are categorised as “Countryside”, more of which below, the site location both locally (i.e. close to the M1 and to the EMA) and nationally with the excellent transport links, make the site attractive to both existing tenants and other potential occupiers.

Transport with particular regard to events at

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Donington Park is well managed and the appropriate working groups have been established to include the Highways Agency, the County Highway Authorities, NWLDC, the Police, and other stakeholders. Any traffic disruption is limited to a minimal number of weekend days and the necessary controls are put in place to minimise any disruption to the highway network.

Clarity is required in the Plan on the differentiation between motorsport and other track activity. On a significant number of days the track has "Quiet Days" (subject to a drive-by noise measurement test) which is set at a noise level similar to road going vehicles. On these days the majority of the vehicles used are road going with the participants driving them to and from the site. In addition to on track, other parts of the Estate are frequently used by road going vehicles for a range of tests and uses, for example vehicle trials, vehicle launches, driver training and 4x4 use. The track and indeed other parts of the Estate as used by such road going vehicles do not give rise to exhaust noise issues and so can only have negligible impact on local residents.

Over the eastern part of the property any additional tree planting is strongly resisted by East Midlands Airport as it would be contrary to flight safety and the operation of the airport. This concerns not only tree height but also bird occupation. Over a number of years significant tree planting has taken place elsewhere across the estate, in particular along the southern boundaries, to help screen the site.

The proposed Policy Ec8 extension "Ec8 Policy East" has been subject to a number of planning applications which have since the 1970's resulted in various developments including the location of the Exhibition Centre and associated car parking, Museum and Cafe and its associated car parking as well as the long term car parking for East Midlands Airport (EMA) and most recently for the plant and machinery auction site. Parts of this area therefore have long historic industrial permissions – the Exhibition Centre / Engine Room was once Rolls Royce's aviation engine assembly shed - from before the Wheatcroft purchase in the 1970s, and the majority of it has been hard surfaced for many

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years. The site is under the flight path and close to EMA. In light of historic uses and extant permissions and that the area has a commercial look and feel (the majority is hard surfaced and includes various buildings) WPL consider that inclusion in Policy Ec8 is more appropriate than being defined as "Countryside".

DPR welcome the proposed policy wording in 2(a) and 2(b) which allows for ongoing operational development and provision of facilities and infrastructure.

In regards to 2C DPR considers that the Local Plan proposed wording is perhaps unintentionally restrictive and imposes a significant policy constraint on managing the increased need for paddock space at major events as well as on developing the full potential of Donington Park and its importance as a test and research centre for the automotive and motor sports industries under National Government policies which support the development.

DPRL believe it important that it be recognized by planning authorities that motor racing and the technology developed by it, and often tested at Donington Park, has many real world wider applications which are often seen in subsequent automotive and related industry development. DPR propose that Paragraph 2 (c) be amended to read;

(c) motorsport and automotive ancillary infrastructure where the proposed development has a clear functional relationship with the racetrack and is of a scale that is appropriate to that relationship. These comments are also relevant to Part 3a of Policy Ec8.

In regards to 2d the proposed area and extent of Policy Ec8 represents part of the wider Donington Park site. If further landscaping works are deemed necessary to help screen any future development the preferred location for those works may well be outside the Policy Ec8 area. The proposed policy needs to reflect this (this is also relevant in respect of 2e).

3b - Firstly greater clarity is required to differentiate the land subject to this policy from "the site" where clearly "outside racing and

<p>testing” has in fact always been fundamental to the operation of the circuit and for which there are existing permissions in place. This includes the area referred to above as Ec8 West. Secondly, consideration needs to be given as to the reason for this wording as is understood by DPR that it is related to potential noise impacts. It is understood that the proposed policy wording is based on the fact that any outside testing of vehicles or components creates some form of nuisance. Clearly this is not the case nor is there evidence to support this. The proposed area is already used frequently for a wide range of activities such as emergency services driver training, and for vehicle and component testing and new car launches to media and dealers, all of which are for road silenced vehicles. A further example of low noise impact operation on this area is by Formula E electric car racing teams, who have used these tarmac areas for simple straight line testing for the race cars where the use of the entire circuit is not required. DPR’s business model requires the continued ability to use these areas not only for developments proposed by the policy but also to allow for appropriately silenced non-circuit testing. DPR consider that this current proposed policy wording is too restrictive and may deter future users of the site. Rather, its use could be appropriately controlled by planning conditions. It should be noted that the 2014 planning permission for the Western Paddock did not include any conditions relating to noise and with its Formula E occupancy, there have been no issues. If proposed overall Policy Area Ec8 – and in particular, Ec8 West - is extended, (see DPRL response to Local Plan in 2, above,) then this area will be included in the purview of the DPRL existing Noise Management Plan and therefore the same operating rules would be applied, which have proven to be very effective as described in 4.9 above.</p> <p>3d - Similar comments apply to [b] above and again, control can be by planning conditions.</p>				
<p>The expansion of Donnington Park is supported due to providing significant employment and jobs for residents of NWL.</p>	<p>Noted.</p>		<p>Phil Bamford</p>	<p>Gladman on behalf of Wilton Balmore.</p>
<p>Yes CDPC to forward its own Donington Park policy for consideration.</p>	<p>Noted, although no suggested policy has been made available to the district council.</p>		<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

<p>Reference to the heritage assets within the site would be welcomed, such as the addition of words 'and heritage assets; to criteria (d) of policy Ec8.</p> <p>We are disappointed that this issue has not been picked up by the SA.</p>	<p>It is agreed that it would be appropriate to include reference to mitigating the impact of development upon heritage assets.</p>	<p>Amend to include reference to mitigating the impact of development upon heritage assets.</p>	<p>Emilie Carr</p>	<p>Historic England</p>
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Policy Ec9 – Town and Local Centres: Hierarchy and management of Development

Question 25 Do you agree with our suggested Town Centre hierarchy and our approach to main town centre developments? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes	Noted.		Lisa Marron	Resident
Need input from ashby town neighbourhood plan first !!!	Noted.The draft Local Plan on page 119 sets out its relationship with neighbourhood plans. Any neighbourhood plan needs to be in general conformity with the strategic policies contained in the Local Plan at Appendix 4. Ashby Town Council have been consulted as part of the Local Plan preparation process. The District Council have also had opportunity to make representations on the Ashby Neighbourhood Plan. It is important to note that the Ashby Neighbourhood Plan will need to support the strategic policies of the Local Plan.		Mr s Whitehouse	Personal
Agreed. Belvoir Shopping Centre has no redeeming features.	Noted.		Nigel Garnham	Packington Nook Residents Association
Yes	Noted.		Mark Chadbourn	Emerald Eye Ltd

<p>Since the 2012 study, Coalville has definitely deteriorated in its ability to provide an attractive shopping area.</p> <p>To say that Coalville is the district's main shopping area it is a very poor advert and does nothing to inspire the surrounding area.</p> <p>We definitely do not need an extension to the Precinct. The Precinct needs an overhaul provided that NWLDC will ensure that the units will be filled with meaningful shops and not charity shops, phone shops or estate agents. There are enough of those. We need to attract other retailers such as Peacocks, FarmFoods and a jewellers. Marlborough Square also needs to be able to attract quality retailers and pedestrianisation should be considered maybe along the road which contains Dunelm, partly linking Marlborough and Memorial Squares. There are a lot of people living in the surrounding area who would spend their money in Coalville if there were the appropriate shops. I've lived in this area for 48 years but now go to Loughborough every weekend to shop and have lunch, although I do my main shopping at Morrisons.</p> <p>Talking of option 2 this would be great, provided that the shops leading to it from Memorial square were also made to look more attractive</p>	<p>The need to regenerate Coalville Town Centre is recognised in Objective 6. It should be noted that the Belvoir Shopping Centre is in private ownership and not within the control of the District Council. In terms of the types of shops, if a property has planning permission for a shop use the local authority generally has no control over the actual type of shop that goes in.</p> <p>Support for the appropriate retail development of land at Memorial Square is noted.</p>		Alison Wright	Heather Parish Council
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<p>Policy Ec9, Item 2</p> <p>Coalville is not the preferred location for major retailers. Precinct rents are too high they are resulting in more and more shops closing and national chains leaving the town. Retailers seem to prefer Ashby town centre, there are shops of major chains present in Ashby that are not in Coalville, or they were represented in Coalville but are not there any longer.</p> <p>Item 7.69</p> <p>Whilst the plan may suggest that Coalville town centre is the priority for further retail developments the plan does not suggest how any improvement can be made. No progress has occurred over the last ten years and the town centre continues to decline with more empty retail space. We hear of more shops closing almost every month.</p> <p>So this is a plan, so why is there no clue as to what will or can be done to improve the situation? It should be in the plan.</p> <p>The precinct owners continue to increase rents and the introduction of car parking charges reduced footfall by around 33% (according to retailers). At least the plan could state that no more edge of town retail will be approved.</p>	<p>Coalville is the district's principal shopping area due to its size and range of facilities. Ashby de la Zouch is a smaller centre, however its unique character and role in relation to surrounding communities is recognised by the Local Plan.</p> <p>Coalville is the preferred location for additional additional retail development, to support its role as the principal shopping area and aid its regeneration. Further work is being undertaken on the options as to how this retail development may be provided, looking at issues such as availability and deliverability.</p> <p>In accordance with national policy, Policy Ec9 seeks to ensure that the development of main town centre uses will only be allowed outside defined centres if it can be demonstrated that suitable sites are not available within the centres. Edge of centre sites are preferable to out-of-centre sites</p>		Steve Palmer	NA
<p>Not at this juncture. It would be useful if the Plan explained two things: what is the status of the Belvoir Shopping Centre extension application; the current application for an extension to the implementation date is categorised as 'awaiting decision' on your website; and is there any consideration of the impact of the selected option and the Belvoir Shopping Centre extension both taking place. Can they? Would this be acceptable for the town centre? Without this it is I find it difficult to offer a view on the provided options.</p>	<p>The Plan identifies a number of options for additional retail provision within the district, one of which is an extension to the Belvoir Shopping Centre which is the sequentially preferable option. However, despite there previously being permission to extend the shopping centre, this has not taken place. Therefore given the best available information, the stated retail need has been calculated on the basis that the proposed redevelopment of the Belvoir Shopping Centre will not come forward and hence this site has not been allocated at the present time as we do not have any clear, demonstrable evidence that it would be likely to be implemented.</p> <p>All the relevant background information is contained within Background Paper 10 that accompanies the Draft Local Plan.</p>		Phil Larter	None
<p>N/A</p>	<p>Noted.</p>		Samantha Lockwood	Long Whatton and Diseworth Parish Council

Any new builds will destroy the historic character of Ashby town centre.	All the policies in the Local Plan have to be read together. The Local Plan includes Policy S5 which supports good design, having regard to the way a place functions, appearance and relationship of development with its immediate and wider surroundings. In addition Policy He1 supports the conservation and enhancement of the district's historic environment when new development is proposed.		None	none
Don't plan the future on the past	The draft policies are based on a recent review of our town and local centres and an up to date Retail Study.		David Harris	Pyrotect Ltd
The planned Town Centre hierarchy is supported.	Noted.		Karen Edwards, Deputy Town Clerk	Ashby de la Zouch Town Council
The Town Centre hierarchy is supported, defining Coalville and Ashby as 'Town Centres' given their scale and function serving the wider area. The smaller settlements as 'Local Centres' including Castle Donington is also supported. As discussed earlier with regard to settlement hierarchy there is a clear difference between Ashby and Castle Donington which should be defined as per Policy Ec9 but should also be the case for Policy S3.	Noted. Please see response to Policy S3.		Angela Cornell	Fisher German
Do more to aid the shops and the conservation area in Ashby to keep its unique feel.	Policy Ec11 and Ec13 support the principle of retaining a shopping focus in our town centres in combination with a range of complimentary main town centre uses. The Local Plan also includes Policy He1 which seeks to support and enhance our historic environment.		Andrew Stone	NA
I agree that Coalville and Ashby are the two main shopping areas and that Coalville town centre needs improvement. I do not think that extra retail space is the answer, rather the improvement of the existing space, perhaps by encouraging independent small retailer in to the precinct by reduced rents, and by removing car parking charges to encourage people to use the town as their main shopping area. Development should be around the current town centre, not out-of-town, making the most of the existing shopping streets and the precinct and the market (in an excellent position by the car park).	Evidence from the Retail Study identifies that there will be a need for additional retail space over the period of the Local Plan. Policy Ec9 supports the application of the sequential approach for the development of retail and other town centre uses. Car parking charges are beyond the scope of the Local Plan. The precinct is privately owned and the issue of rents is a matter for the owner.		Mary Lorimer	Not applicable
We have no choice but to agree however the options given are biased towards Coalville development.	Our priority is for the additional shopping provision to be located in Coalville town centre , as supported by the Retail Capacity Study. Additional retail development would support its continuation as the district's principal shopping area and support its regeneration.		Measham Parish Council	Measham Parish Council
In principle	Noted.		Edward Hines	N/A
Yes	Noted		David Bigby	Private individual

<p>Coalville shopping is a sad reflection on the district, something needs to be done urgently to assist the town.</p> <p>Ashby is not a lot better even though it is considered a wealthy town it is mostly pubs, fast food, charity shops and beeting shops. There are not many proper shops along the high street.</p>	<p>The plan identifies Coalville as the preferred location for additional retail floor space for comparison (non-food) goods. This would supports its continuation as the district's principal shopping area and aid its regeneration. Work is also being undertaken within the Council to assist and promote the regeneration of Coalville. A dedicated Coalville Project has been established to facilitate/steer work on a number of projects to regenerate Coalville, including the designation of a Conservation Area, works to Coalville Market, Pick and Shovel redevelopment and Shopfront Improvement scheme.</p> <p>Policy Ec11 seeks to retain and promote shopping as the primary use of our town and local centres, supported by a range of complementary main town centre uses.</p>	<p>Amend supporting text to Poliy Ec9 to provide information and background to the regeneration work within the Coalville that is being sought for and facilitated by the Council.</p>	<p>Paul McCaffrey</p>	<p>NA</p>
<p>Yes</p>	<p>Noted</p>		<p>Lance Wiggins</p>	<p>Landmark Planning</p>
<p>The approach is not robust enough to rebuild the historic environment of Coalville town centre and to integrate the built heritage into an overall strategic plan. There is no reference to Historic England or to work with them and other cultural/creative agencies in making the hidden heritage of Coalville a USP to attract shoppers and tourists.</p>	<p>All policies in the plan have to be read together. A variety of work has been undertaken to date that recognises and supports the value of Coalville's heritage, including the designation of the Conservation Area and the Shopfront Improvement Scheme. Policy He1 seeks to conserve and enhance the district's historic environment and heritage asset. The Council has and will continue to work with Historic England and other relevant stakeholders, on such matters.</p>		<p>Ruth Hamm</p>	<p>teacher</p>
<p>The Plan States that "Provision will be made for an additional 7,300 sq metres (net) of retail floorspace for comparison goods" in Coalville.</p> <p>Why? Where is the demand? Online shopping and comparison sites have overtaken this policy already. Town Centres need a new purpose based around socialising, eating, drinking, and cultural exchange.</p> <p>Instead of planning for a retail past, we need to focus developers towards providing community facilities such as restaurants, pubs, clubs, and use culture and heritage to draw people into the town.</p>	<p>The need for additional retail comparison floor space over the lifetime of the plan is identified in the Retail Capacity Study. In coming to this conclusion consideration was given to people's changing shopping patterns and habits, including online shopping.</p> <p>Policy plans to retain shopping as the primary use in our town and local centres, supported by a range of complementary other main town centre uses. The diversity of uses in a centre is recognised as playing an important role in its vitality and viability.</p>		<p>Theresa Eynon</p>	<p>alderoak</p>
<p>Yes</p>	<p>Noted.</p>		<p>mr j lewis</p>	<p>1950</p>

<p>The councils preferred option 2 should be rejected again because of the reasons stated and in any case large supermarkets are outdated and will slowly vanish.</p> <p>Option 3 seems at least partly off the agenda as an entrepreneur with faith in Coalville has reopened the nightclub. The town needs an entertainment centre to it a larger cinema would be a welcome addition to the Marlborough Square area too. The craving of NWLDC to cram in housing and big chain shops does nothing for the soul of the town.</p> <p>Option 5 seems logical, play it by ear and encourage positive developments like the Ford Motors site. The Belvoir Shopping Centre does seem tired now and the market ought to be moved to a central place, perhaps near the clock tower as it once was.</p>	<p>The identified need is for additional retail comparison (non-food) floorspace and not convenience (supermarket) floorspace. Further work has been undertaken since the publication of the draft plan which has shown that both sites identified as part of option 3 are not available for retail development.</p>		Steve Johnson	YYYY
Yes	Noted		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Hugh James	n/a
Agree in respect of Ashby; approach for Coalville to be subject to further analysis?	Noted. Further work is being undertaken with respect to allocation of site in Coalville for retail comparison (non-food) development.		Tim Abbott	Householder
See previous comments	<p>Policies EC11, Ec13 and Ec14 support and promote shopping as the main use within our town and local centres, supported by a range of complementary range of main town centre uses.</p> <p>This is consistent with national planning policy.</p> <p>The Council will work with private landowner to support/facilitate appropriate new retail development. An overall council priority is also to support and promote the regeneration of Coalville, which is supported by Objective 6 of the Local Plan</p>		Jane Tebbatt	Quarrying
Pedestrianise the whole of the centre from Memorial Square through to Marlborough Square. With no traffic, this would make an amazing place for a retail and leisure complex.	Comments are noted and will be considered as part of other work taking place across the Council in order to assist and promote the regeneration of Coalville. Work to date includes the designation of the Conservation Area and a Shopfront Improvement Scheme.		Heather Parish Council	Heather Parish Council
<p>I would add a preference for pedestrianisation or partial pedestrianisation for Town Centres wherever possible.</p> <p>Market Street, Ashby de la Zouch would benefit from this as it is both a primary shopping area and a busy main road.</p>	Comments are noted. Leicestershire County Council has previously considered and consulted on proposals for Market Street, which included increased pedestrian facilities. However these were not supported locally.		Douglas Cooper	Member of Friends of Bath Grounds
Yes	Noted		JON WALTERS	LPT

<p>Kegworth shouldn't be "low key retail centre", it's a growing centre. KPC consider that it should have been included in the 2012 Study and look to NWLDC to promote local retail opportunities and parity with Ibstock and Measham regarding hierarchy.</p>	<p>Kegworth has not been included within the Retail Capacity Studies, primarily due to its size and the limited amount of information available to feed into the study. However the local plan does recognise the role of Kegworth as a local centre that provides day to day goods services, primarily to meet the local needs of its residents. As such it is proposed to be designated as a Local Centre, alongside Castle Donington, Ibstock and Measham. Policy Ec14 seeks to protect the shopping function of the district's local centres, seeking this as the predominant use, alongside complementary other main town centre uses. Specific retail opportunities/allocations have not been identified in the plan as a need has not been identified nor have specific and deliverable sites be promoted.</p>		<p>Vicky Roe</p>	<p>Kegworth Parish Council</p>
<p>(a) The public remain and will remain sceptical of any 'visions' for our town centres</p> <p>(b) We are surprised that the so called 'Coalville Project' has not been incorporated within the draft Local Plan. This is a serious omission. It is difficult to find a suitable question to hang Group scrutiny and comment on the so called project. However, we will be able to explain our concerns to the Inspector.</p> <p>(c) Castle Donington Councillors want retail expansion in the TC to be included in the Local Plan</p> <p>(d) There has been changes in detail of specific sites since publication of documents</p> <p>(e) Do we really need retail sequencing?</p>	<p>This policy includes a range of options to be considered with reference to additional retail provision. Since the publication of the draft plan work has progressed on this matter as has work being undertaken through the 'Coalville Project'. In addition clarification has been provided on a number of sites that had been identified as potential options. Therefore this policy will need updating to reflect these changes</p> <p>New retail development, as well as proposals for main town centres, must follow the sequential approach as defined in the National Planning Policy Framework.</p> <p>With reference to retail expansion, specific and deliverable sites would need to be identified in order to be considered a potential for allocation. To date no additional retail need has been identified in Castle Donington.</p>		<p>Sue McKendrick</p>	<p>Labour Group leader</p>
<p>The Plan States that "Provision will be made for an additional 7,300 sq metres (net) of retail floorspace for comparison goods" in Coalville.</p> <p>Why? Where is the demand? Online shopping and comparison sites have overtaken this policy already. Town Centres need a new purpose based around socialising, eating, drinking, and cultural exchange.</p> <p>Instead of planning for a retail past, we need to focus developers towards providing community facilities such as restaurants, pubs, clubs, and use culture and heritage to draw people into the town.</p>	<p>The need for additional retail comparison floor space over the lifetime of the plan is identified in the Retail Capacity Study. In coming to this conclusion consideration was given to people's changing shopping patterns and habits, including online shopping.</p> <p>Policy plans to retain shopping as the primary use in our town and local centres, supported by a range of complementary other main town centre uses. The diversity of uses is recognised as playing an important role in the vitality and viability of our centres.</p>		<p>Mrs Kurpil</p>	<p>NA</p>

<p>Policy Ec9 sets out a proposed retail hierarchy which identifies Coalville and Ashby de la Zouch as town centres and Castle Donington, Ibstock, Kegworth and Measham as Local Centres. This proposed hierarchy is supported, particularly in relation to the identification of Ibstock as a Local Centre along with Castle Donington, Kegworth and Measham. This appropriately reflects the sustainability of the settlement and the range of services and facilities available.</p>	<p>Noted.</p>		<p>Guy Longley,</p>	<p>Pegasus Group on behalf of Davidsons Developments Limited.</p>
<p>We agree with the Town Centre Hierarchy, that Coalville should be the priority for town centre uses.</p> <p>We also agree that Options 4 and 5 (page 75) would not meet the requirements of NPPF and that Option 1 would be inappropriate because history has shown us that a redevelopment of the Belvoir Centre is unlikely to take place. In terms of Option 2 and 3, an assessment of the viability of those sites need to take place, both to assess whether it is feasible for them to come forward for development but also to assess what quantum of floorspace could be accommodated.</p> <p>As well as carrying out an assessment of the sites mentioned in Options 2 and 3 we would also suggest that there should be a designation at Whitwick Retail Park similar to the existing Development Plan. It is a site where it is known that large format retail can feasibly be accommodated and locating further retail floorspace at the retail park would be sustainable because people can link trips between the difference stores and the adjacent Morrisons. If retail facilities at the park are kept to largescale comparison goods retailing (as is currently the case) and A2 services are limited then it would not unduly compete with Coalville Town Centre. There are limited opportunities within or close to Coalville Town Centre to accommodate largescale retail uses so designating the Whitwick Retail Park would be a logical solution to ensuring that further retail investment can take place in the town and expenditure can be retained to benefit the local community.</p>	<p>It is not considered necessary to designate the Land at the Whitwick Retail Park. The comments are noted and it is appreciated that there may be limited opportunities for large scale retail development within Coalville Town Centre. However any application for retail development at the retail park would be undertaken using the application of the sequential test.</p>		<p>Nicole Roe</p>	<p>NJL Consulting</p>
<p>With the new future developments proposed for Coalville the Council need to revitalise the town centre as neighbouring Towns have done there is nothing for the younger generation in Coalville.</p>	<p>Noted.</p>		<p>Mr & Mrs M Bennion</p>	<p>N/a</p>

<p>Coalville focus agreed but no extra land to be allocated. Reuse of empty shops is sufficient.</p>	<p>The Retail Capacity Study identifies a need for an additional 7,300 sqm of retail floorspace for comparison (non-food) goods. In order to meet this need the preference would be for additional land to be allocated as this amount of space cannot be accommodated through the reuse of existing empty retail units.</p>		<p>C Tandy</p>	<p>Ashby de la Zouch Civic Society</p>
<p>Whilst the plan may suggest that Coalville town centre is the priority for further retail developments this does not suggest how any improvement can be made.</p> <p>No progress has occurred over the last ten years and the town centre continues to decline with more empty retail space. The potential retail benefit of new developments should be to encourage residents to shop and buy local and provide an infrastructure to achieve this, i.e. local affordable bus services and accessible parking</p>	<p>The Local Plan is only one element that can contribute to the regeneration of Coalville. Other recent work includes the Shop Improvement Scheme as well as the establishment of the Coalville Project. Policies within the local plan aim to support the regeneration of Coalville and its role as the district's principal town within the district, through the identification of new sites for retail development and to also resist inappropriate development elsewhere.</p>		<p>Simon Weaver</p>	<p>Hugglescote and Donington le Heath Parish Council</p>
<p>Consideration should be given to the reduction of traffic and pollution in the Town Centre to support regeneration of the existing retail area with the redevelopment of existing sites. Increased footfall will attract investment and new retailers. This will have consequential benefits for the quality and quantity of services and facilities provided within the town centre for residents. The approach could be expanded to enable an additional Town Centre site to enhance retail and leisure facilities and stimulate increased retail and leisure activity.</p>	<p>Noted. These issues could be usefully addressed or included within the production of a Master Plan of any site that may come to be allocated. The need for additional retail floorspace is evidenced in the Retail Capacity Study. Therefore shopping is sought as the primary use of our centres with a range of complementary main town centre uses, including leisure development.</p>		<p>Sharon Wiggins</p>	<p>Leicestershire County Council</p>
<p>Policy Ec9 sets out a proposed retail hierarchy which identifies Coalville and Ashby de la Zouch as Town Centres and Castle Donington, Ibstock, Kegworth and Measham as Local Centres. This proposed hierarchy is supported, particularly in relation to the identification of Ashby de la Zouch as a Town Centre, as it is considered that this appropriately reflects the sustainability of the settlement and the wide range of services and facilities available.</p>	<p>Noted.</p>		<p>Pegasus Group on behalf of Miller Homes</p>	<p>Pegasus Group</p>
<p>The Plan States that "Provision will be made for an additional 7,300 sq metres (net) of retail floorspace for comparison goods" in Coalville.</p> <p>Why? Where is the demand? Online shopping and comparison sites have overtaken this policy already. Town Centres need a new purpose based around socialising, eating, drinking, and cultural exchange.</p> <p>Instead of planning for a retail past, we need to</p>	<p>The need for additional retail comparison floor space over the lifetime of the plan is identified in the Retail Capacity Study. In coming to this conclusion consideration was made to people's changing shopping patterns and habits, including online shopping.</p> <p>Policy plans to retain shopping as the primary use in our town and local centres, supported by a range of complementary other main town centre uses. The diversity of uses is recognised as playing an important role in the vitality and viability of our centres.</p>		<p>Mr B Carter</p>	<p>n/a</p>

focus developers towards providing community facilities such as restaurants, pubs, clubs, and use culture and heritage to draw people into the town.				
Yes n/a to Castle Donington.	Noted.		Fiona Palmer, Clerk to the Parish Council	Castle Donington Parish Council
There is insufficient emphasis on heritage assets within town centres and other retail areas. Refer back to our previous letter ;reference to the historic environment character of towns (where relevant) is necessary here,	This policy supports the principle of retaining a shopping focus in our town centres in combination with a range of complimentary main town centre uses. All the policies in the Local Plan should be read together. The Local Plan also includes Policy He1 which seeks to support and enhance our historic environment and is an integral part of the development plan and planning application process.		Emilie Carr	Historic England

Policy Ec10: Town and Local Centres Thresholds for Impact Assessments

Question 26 Do you agree with our suggested thresholds? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes	Noted.		Lisa Marron	Resident
Need input from ashby town neighbourhood plan !'	Noted. Ashby Town Council have been consulted as part of the Local Plan preparation process. The District Council have also had opportunity to make representations on the Ashby Neighbourhood Plan. It is important to note that the Ashby Neighbourhood Plan will need to support the strategic policies of the Local Plan.		Mr s Whitehouse	Personal
Yes	Noted.		Nigel Garnham	Packington Nook Residents Association
Yes	Noted.		Mark Chadbourn	Emerald Eye Ltd
Leisure and business .. yes RetailNO	The proposed thresholds are based on advice contained within the 2012 Retail Study, and have been formulated taking into local circumstances of our centres.		Alison Wright	Heather Parish Council
Page 76 Policy Ec10 and question 26 There should be no threshold for new town centre retail development. Why make life even more difficult?	The NPPF advises that where applications for retail, leisure and office development are outside of town centres, then an impact assessment is required. The proposed thresholds are based on advice contained within the 2012 Retail Study, and have been formulated taking into local circumstances of our centres . If thresholds are not set locally, a nationally defined default threshold would have to be followed. Issues an impact assessment would consider include the impact of the development on a town centre's vitality and viability and consumer choice.		Steve Palmer	NA
No	Noted.		David Harris	Pyroprotect Ltd
The Town Council supports the thresholds and would resist additional out of town retail developments.	Noted.		Karen Edwards, Deputy Town Clerk	Ashby de la Zouch Town Council
Yes	Noted.		Andrew Stone	NA
Yes	Noted.		Measham Parish Council	Measham Parish Council
Yes	Noted.		Edward Hines	N/A
Yes	Noted.		Lance Wiggins	Landmark Planning
Yes	Noted.		Mr. j Lewis	1950
Yes	Noted.		Steve Johnson	YYYY
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Heather Parish Council	Heather Parish Council
No	Noted.		JON WALTERS	LPT
Yes	Noted.		Alison Saxby	N/A
Yes	Noted.		Vicky Roe	Kegworth Parish Council

<p>(a) We do not agree</p> <p>(b) Where 'The Market' cannot or will not provide then NWLDC needs to be proactive by Compulsory Purchase sites to ensure town centre improvement.</p> <p>(c) We feel that there is a lack of identification of rapid evolution of retail within Europe due to internet sales and home delivery.</p> <p>(d) The public are demanding more leisure day and night-time facilities from our town centres and (much) less retail. The draft Local Plan does not specifically detail these demographic moves.</p> <p>(e) Lack of retail in northern villages – and communities such as Albert Village, Moira, Norris Hill, Ashby Heights (etc) need measure in place to provide retail growth and a sustainable future.</p>	<p>The National Planning Policy Framework requires the application of an impact assessment for proposed developments over a specified size. The Retail Capacity Study recommends the appropriate threshold for each of the district's town and local centres.</p> <p>The draft plan has only identified a number of potential sites for retail development and further work is being undertaken regarding the availability, deliverability etc. However it is recognised that the use of Compulsory Purchase Order is a means to secure land for development.</p> <p>In assessing potential new retail need, the Retail Capacity Study took into account peoples changing shopping patterns such as use of the internet.</p> <p>Although policies support shopping as the primary use within our own centres, policies also allows for the development of complementary other main town centre uses, which do include leisure uses and those that contribute to the night time economy.</p> <p>National planning policy as well as the draft Local Plan, recognise the importance of rural communities having access to community facilities. Policy IF2 seeks the retention, and wherever possible, improvement to the provision of community facilities, such as shops.</p>		Sue McKendrick	Labour Group leader
<p>We agree that it is prudent to set a local threshold but feel that it would be more appropriate to have that threshold higher for designated sites that are outside the town centre. This would further help to direct new retail floorspace to designated sites and prevent the sporadic siting of facilities.</p>	<p>There are no designated retail sites at this stage of the draft Local Plan outside of the centres. The suggested thresholds are an outcome of the Retail Capacity Study. There is no submitted evidence to justify why the threshold should be increased.</p>		Nicole Roe	NJL Consulting
<p>Out of town development is resisted.</p>	<p>Noted. Policy Ec9 supports the sequential approach to retail development.</p>		C Tandy	Ashby de la Zouch Civic Society
<p>Yes</p>	<p>Noted</p>		Fiona Palmer, Clerk to the Parish Council	Castle Donington Parish Council

Policy Ec11 – Town and Local Centres: Primary Shopping Area – Non-shopping uses

Question27	NWL Response	Any change required?	Name	Business or organisation name;
Do you agree with our suggested approach to Primary Shopping Areas? If not what changes do you suggest? - Please provide further comments;				
Yes	Noted.		Lisa Marron	Resident
As previous answer	Noted. Ashby Town Council have been consulted as part of the Local Plan preparation process. The District Council have also had opportunity to make representations on the Ashby Neighbourhood Plan. It is important to note that the Ashby Neighbourhood Plan will need to support the strategic policies of the Local Plan.		Mr s Whitehouse	Personal
Yes	Noted.		Nigel Garnham	Packington Nook Residents Association
Yes	Noted.		Mark Chadbourn	Emerald Eye Ltd
Yes	Noted.		Alison Wright	Heather Parish Council
Page 77 - Item 7.74 The plan should include development of the Mitchell Grieve site for town centre living. Residents would shop, eat and probably work in the town centre increasing footfall and supporting regeneration.	The draft Local Plan identifies a number of potential options for meeting the additional comparison floorspace requirements, including this site (Option 2).		Steve Palmer	NA
Don't plan the future on the past .	Noted. The draft policies are based on a recent review of our town and local centres.		David Harris	Pyrotect Ltd
The Town Council's previous comments on the primary shopping area for Ashby de la Zouch have been incorporated within this document. The Town Council is therefore supportive of the planned boundary, however the new Coxon Mews development now needs including.	Noted. This is a development that has recently been completed and currently comprises a cafe and hairdressers/beauticians at ground floor. It has been included within the proposed town centre boundary. Since the completion of the development, a review has been undertaken and it is suggested that this development be incorporated within the defined primary shopping area.	Amend the boundary of the primary shopping area to incorporate Coxton Mews, to the rear of South Street/Bath Street.	Karen Edwards, Deputy Town Clerk	Ashby de la Zouch Town Council
Yes	Noted.		Andrew Stone	NA
Yes	Noted.		Mary Lorimer	Not appliccable
Yes	Noted.		Trevor Davis	None
Yes	Noted.		Measham Parish Council	Measham Parish Council
Yes	Noted.		Edward Hines	N/A
Yes	Noted.		David Bigby	Private individual
Yes	Noted.		Lance Wiggins	Landmark Planning
Yes	Noted.		Mr. j Lewis	1950
Yes	Noted.		Steve Johnson	YYYY
Yes	Noted.		Lesley Birtwistle	not applicable
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Tim Abbott	Householder
Yes	Noted.		Heather Parish Council	Heather Parish Council
Yes	Noted.		JON WALTERS	LPT

Yes	Noted.		Alison Saxby	N/A
<p>(a) In principle the Labour Group will support proposed policy Ec11</p> <p>(b) However, the council needs to be far more proactive to bring first storey accommodation in town centre retail units back into human habitation. This will bring more footfall for convenience retail – and more prosperity into our High Streets.</p>	Noted. Policy Ec11 supports the reuse of upper floors but its implementation will require initiatives outside the scope of the Local Plan.		Sue McKendrick	Labour Group leader
<p>2.2 We have a number of comments on the factors set out in Policies Ec11 and Ec13:-</p> <p>1. They are vague and do not provide an objective test against which an applicant might be able to test their proposal prior to making a planning application. As a result they do not inform the prospective applicant. For example, how does an applicant prove his proposal would make a 'positive contribution to the diversity of uses on offer'? (bullet 1) At what point is the shopping element 'undermined? (bullet 2) What is a 'cluster'? (bullet 3)</p> <p>2. It is not clear whether an application has to comply with one or all of the 'bulleted' factors.</p> <p>The same criticism can be made of the factors set out in paragraph 7.74:-</p> <ul style="list-style-type: none"> · What is the 'appropriate balance' and how does an applicant determine this in advance of making an application? (1st bullet) · What are the factors taken into account in considering the 'type and characteristics of other uses' in the vicinity? (2nd bullet) <p>2.4 The final bullet of paragraph 7.74 assumes that non-retail uses are uses of last resort; only to be contemplated if premises cannot find a retail occupier for 6 months. Non-retail uses not only add to the attraction and diversity of a centre but are essential to the shopping experience in giving access to cash (banks and building societies) and lengthening and enhancing the visit to the town centre (catering uses).</p> <p>2.5 On any objective basis a number of the</p>	<p>It is agreed that it would be beneficial to combine Policies Ec11 and Ec13 so as to avoid duplication. The wording of the policy is intentionally not too prescriptive so as to allow flexibility to all those involved in the process. The approach suggested allows for consideration to be given to the merits of the application and to take account of local circumstances and the locality. Regard should be had to all these factors and the wording shall be amended to clarify this. Para 7.74 provides the list of factors to be taken into account when considering a planning application, and is purposefully non prescriptive to allow account to be taken of the circumstances when permission is sought. It is agreed however that it would be beneficial to remove reference to a specific length of time in the final bullet point of para 7.74. It is also suggested that reference to primary and secondary frontages is removed, as they could be too restrictive and inflexible. Ashby Town Centre map does not need to be amended to clarify 34-40 Market Street are to form part of the primary shopping frontage, as the primary and secondary frontage designations are to be deleted. We wish to ensure Ashby retains a predominance of shopping uses. Should it be considered that there not be suitable premises for a use within the defined town centre, the sequential test can be applied.</p>	<p>Make it clear that in Ec11(1) that all three bullet points have to be satisfied; Amend the last sentence of Ec11(1) before the bullet points to state "Development of other main town centre uses within the Primary Shopping Areas will be acceptable where, at the time that an application is determined, ..."; Amend the supporting text including reference to a specific period of time for marketing attempts. Delete Policy Ec13 and merge relevant sections with Policy Ec11.</p>	Roger Etchells	Roger Etchells & Company

frontages described as 'Primary Shopping Frontage' on the proposals map cannot be so described in the light of the definition provided in the glossary to the NPPF:-

'Primary and secondary frontages: Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses.'

Some of the frontages which are put forward as 'Primary' are manifestly not primary on this definition. The following are secondary:-

- West side of Bath Street
- Rushtons Yard
- Brook Street
- Pass Courtyard
- Mill Lane Mews
- East end of Market Street (to the east of the Market Hall)

2.6 One frontage comprising 34-40 Market Street and the former Post Office seems to have been excluded from the 'Primary' frontage because the notation showing that area goes round the 'island' block comprising 34a - 40a Market Street. We assume this is just an oversight but suggest it be corrected in future versions of the plan.

2.7 There is an argument for greater flexibility of use in Ashby town centre because of the competitive effects of the out of centre shopping (see below).

The retail offer in Ashby has noticeably declined with successive out of centre developments which have taken place on the east side of the centre (the fact cannot be ignored that the amount of out of centre retail floorspace in Ashby has roughly doubled in the last 5 years with the extension of Tesco and developments at Dents Road - Aldi, Wickes, Pets at Home, Flooring and Bed Company). This has impacted on the range of shopping

<p>provision in Ashby town centre. From our experience of the local market retail demand has also declined.</p> <p>3.2 This decline in demand points to a flexible policy towards non-retail uses. As set out above the extent to which the proposed policy is flexible is unclear as the wording is so vague. We would urge that whatever policy is adopted it should allow for considerable flexibility in these circumstances.</p>				
<p>Yes.</p>	<p>Noted.</p>		<p>C Tandy</p>	<p>Ashby de la Zouch Civic Society</p>
<p>Yes</p>	<p>Noted.</p>		<p>Mrs. A Saxby</p>	<p>n/a</p>
<p>The Parish Council have sent a plan to outline what it feels very strongly is the town centre of Castle Donington.</p>	<p>It is noted that the Parish Council agree with the approach towards the identification of Primary Shopping Area.</p> <p>However a map has been submitted identifying changes to be made to the defined Castle Donington Town Centre/Primary Shopping Area.</p> <p>The defined town centre within the draft Local Plan has been drawn up using the relevant definitions contained within the National Planning Policy Framework. This states that a town centre is a defined area "including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area." The Framework then goes on to state that the Primary Shopping Area is the "defined area where retail development is concentrated."</p> <p>The amendments suggested are considered to be areas that are not predominantly occupied by town centre areas nor are they areas where retail development is concentrated. It is therefore not suggested that these changes be incorporated within the draft Local Plan.</p>		<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

Policy Ec12 – Town and Local centres: Primary Shopping Areas – Hot-Food Takeaway Balance

Question 28	NWL Response	Any change required?	Name	Business or organisation name;
Do you agree with our suggested approach to Hot Food Takeaways? If not what changes do you suggest? - Please provide further comments;				
Yes	Noted.		Lisa Marron	Resident
Yes	Noted.		Mr s Whitehouse	Personal
Yes	Noted.		Nigel Garnham	Packington Nook Residents Association
Yes	Noted.		Mark Chadbourn	Emerald Eye Ltd
Yes	Noted.		Alison Wright	Heather Parish Council
Don't be biased look at Charity shops, there are far too many.	Noted however with respect to charity shops, there is no planning control over their use as they are classed as a 'shop use'.		David Harris	Pyrotect Ltd
The Town Council supports the continuing of restrictions on the opening of new Hot Food Takeaways.	Noted.		Karen Edwards, Deputy Town Clerk	Ashby de la Zouch Town Council
Yes	Noted.		Andrew Stone	NA
Small independent hot-food takeaways are good; chains are not.	The planning system is only able to have control over the use type - not the company that may wish to occupy it. It is not the role of the planning system to interfere on matters such as ownership as this is a function of the market.		Mary Lorimer	Not applicable
Yes	Noted.		Trevor Davis	None
Agree if strictly adhered to. The policy of litterbins should be extended to existing hot food takeaways also.	Noted. It is not possible through the planning system to retrospectively require the provision of litter bins by existing businesses.		Measham Parish Council	Measham Parish Council
Yes	Noted.		Edward Hines	N/A
Yes, particularly restrictions on further take away food outlets at the eastern end of Market Street, Ashby.	Noted. Policy EC12 part (4) specifically seeks to resist additional take away uses in the 'eastern' part of Market Street.		David Bigby	Private individual
Yes	Noted.		Lance Wiggins	Landmark Planning
Yes	Noted.		Mr. j Lewis	1950
Yes	Noted.		Steve Johnson	YYYY
Yes	Noted.		Lesley Birtwistle	not applicable
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Note limited frontages for Ashby in Ec12 (4). There is often a concern over the quality of shop front design for these establishments within the Conservation Area.	Noted. All the policies in the Local Plan have to be read together and Policy He1 seeks to ensure that the conservation and enhancement of the district's environment is protected through the development process.		Tim Abbott	Householder
Yes	Noted.		Heather Parish Council	Heather Parish Council

<p>I think the consensus of local views on this topic should have a weighting within the Local Plan. If high levels of support or objection to Hot Food Takeaways are provided by local residents this should count significantly in these cases, as these services are supposed to be there for the people and because they are required. So if there is severe objection this should count.</p>	<p>The policy seeks to strike a balance between allowing hot food takeaways in appropriate locations and circumstances whilst also protecting the shopping function of town centres.</p>		<p>Alison Saxby</p>	<p>N/A</p>
<p>(a) In principle the Labour Group will support proposed policy Ec12</p> <p>(b) We recognise that residents do want food choice and convenience of hot food takeaways. Retail sequencing can be useful but can also restrict new or alternative choice of hot foot takeaway. We feel that there is an argument for 'exceptional digression'.</p>	<p>Support is noted. The approach contained within the Local Plan complies with the sequential approach to the development of main town centre uses as detailed within the National Planning Policy Framework. The Local Plan also recognises that take away uses serve the needs of local communities, contribute to the diversity of uses a centre can offer as well as provide an active frontage during the evening. However take away uses, due to their nature, can have harmful impacts on the locality. Therefore Policy EC12 seeks to ensure take away uses are located in appropriate locations with no resulting adverse impact on amenity and the surrounding area.</p>		<p>Sue McKendrick</p>	<p>Labour Group leader</p>
<p>That takeaway SPD for Ashby should be as is not diluted as suggested.</p>	<p>This draft Local Plan provides a more up to date approach in line with the National Planning Policy Framework which has been published since the Retail Supplementary Planning Document.</p>		<p>C Tandy</p>	<p>Ashby de la Zouch Civic Society</p>

<p>1. Introduction</p> <p>1.1 We have considered Policy Ec12 with regard to the principles set out within the Framework. Local Plans should “plan” positively for development; be justified; effective; and consistent with the Framework. We consider Policy Ec12 is inconsistent with the framework and is therefore considered unsound.</p> <p>1.2 We consider that limiting the concentration and location of hot food takeaways due to their presumed negative health effects on residents would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices.</p> <p>1.3 There is no adequate evidence to justify the underlying assumption, that controlling the concentration of Hot Food Takeaways causes adverse health consequences, which would in turn have negative land use planning consequences.</p> <p>1.4 Policy Ec12 states ‘Hot food takeaway uses should be located within defined town or local centres or within an established parade of shops.’ The Framework states in para 24 that Local Authorities should apply a sequential test to planning applications for main town centre uses. Policy Ec12 is therefore inconsistent with the principles set out in the Framework</p> <p>1.5 The Policy is not flexible or positive in its approach which states ‘within the Market Street Frontage of Ashley de la Zouch, Nos 67 to 89 and Nos 76 to 108, the Council will resist applications for new hot food takeaway uses over and above those in existence, or permitted, at the time of the adaptation of this Local Plan.’ This is inconsistent with para 157 of the National Planning Policy Framework which states ‘Local Plans should allocate sites to promote development and flexible use of land.’ In addition, the levels of takeaway at the time of adaptation is not precise. A measure of acceptable levels needs to be considered and policy based on specific criteria as land uses change over time.</p> <p>2. Such an approach is not positive, justified, effective or consistent with the Framework.</p>	<p>It is agreed that reference should be made to the sequential test when considering such a proposal, therefore it would be beneficial to delete Ec12 (1) as the application of the sequential test is already contained within Ec9(1). Policy Ec12 (2) is not considered unsound as it clearly specifies that it will only apply where there is clear evidence. Policy Ec12 (2) contains the word 'our' as it is the Council's Local Plan. It is also considered that this policy is not unreasonably inflexible, including the reference to the restriction of take away uses within a specific part of Market Street. This is included because there is already an existing significant cluster of take away uses in this identified location and Policy Ec11 seeks to avoid a cluster of non-shop uses, and all policies in the Local Plan have to be read together.</p>	<p>It is proposed to delete Ec12(1) as this issue is already covered by policy Ec9(1). It is also proposed to amend Ec12(2) by the addition of the words “at the time that an application is determined” before the bullet points.</p>	<p>Donna Smith</p>	<p>Planware Ltd</p>
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<p>2.1 Restricting the concentration and location of new Hot Food Takeaway proposals is not a positive approach to planning. The Framework “foreword” sustainable development is about positive growth, making economic, environmental and social progress for this and future generations.</p> <p>2.2 The suggested restrictions, take an ambiguous view of Hot Food Takeaway uses in relation to their health impacts on local residents within the Borough. It would apply an over-generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to Para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area. There is no methodology to consider differing health issues set out in the policy, nor factors to measure or prove where such an issue may arise. Indeed, there is no link between location of hot food takeaways and health issues.</p> <p>2.3 Thus the Policy is inconsistent with Para 19 and 21 of the Framework. Para 19 states:</p> <p>Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.</p> <p>2.4 Para 21 states:</p> <p>Investment in business should not be over-burdened by the combined requirements of planning policy expectations.</p> <p>2.5 No consideration has been given to other Use Classes and their contribution or impact on daily diet or wellbeing. The suggest approach is therefore not holistic and will not achieve the principle aim.</p> <p>2.6 There is lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in Hot Food Takeaways. Evidence confirming this is set out in Appendix A.</p> <p>2.7 A generic restriction on Hot Food Takeaways based on health grounds is disproportionate; is not</p>				
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justified; and would not be effective.

2.8 The Framework cannot be interpreted to provide generic restrictions on a particular use class. Moreover, the evidence does not support such restrictions. The need for evidence is emphasised in para 158 of the Framework which states that each local plan should be based on adequate, up-to-date and relevant evidence. Compliance with the soundness test is still required.

2.9 The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. Such a policy could potentially stifle economic development and is not consistent with the Framework.

3. Soundness - summary

3.1 We consider that restricting the location and concentration of hot food takeaways (A5 Use Class) would be unsound and fails to meet the four tests of the Framework. It is not a positive approach to planning; justified; effective; or consistent with national planning policy. Such a policy should therefore not be taken forward to the next stage of the plan making process.

3.2 Many restaurant operators have made major steps to expand the range of healthy options and work with the communities within which they are / will be part of.

4. McDonald’s has made major steps in recent years to expand the range of healthy offerings

4.1 As a responsible business, McDonald’s recognises it has a role to play to support its staff, customers, and the communities in which it operates to live healthier lifestyles. For this reason, McDonald’s has invested significantly to evolve its menu over the last 10 years – both to extend the range of choice, and to reformulate our products. For example, McDonald’s has:

- Added porridge, salads, grilled chicken wraps, carrot sticks, fruit bags, orange juice, mineral water, and organic milk to its menu

- Completely removed hydrogenated trans-fats from its menu
- Reduced salt in our Chicken McNuggets by 36%, and our fries by a quarter since 2003
- Reduced fat in its milkshakes by 34% per serving since 2010
- Reduced fat in its deli rolls by 42% since 2011

4.2 McDonald's has also led the way displaying nutritional information to help its customers make informed choices. Since 2011, McDonald's has provided calorie information on every one of its 1,200+ menu boards in restaurants across the UK.

4.3 This is in addition to the nutritional information that is already available on its website, on its tray liners, on its packaging, and via McDonald's mobile phone app. In 2012 alone, McDonald's received 2.2 million visits to its nutrition web page.

4.4 Furthermore, McDonald's is committed to responsible advertising, and advertise to children only food items that are not classified by the Government's nutrient scoring criteria as High in Fat, Salt or Sugar "non-HFSS". All of McDonald's advertising to children features at least one portion of fruit or vegetables, and a no added sugar beverage such as milk.

4.5 As a significant customer of British farming, McDonald's buys quality ingredients from 17,500 UK and Irish farmers. It now spends more than £390 million every year on British and Irish produce, compared to £269 million in 2009.

4.6 All of McDonald's burgers are made with 100% British and Irish beef. We use whole cuts of forequarter and flank, with nothing added or taken away in the process.

4.7 In addition, McDonald's only uses 100% British RSPCA Freedom Food Pork across its entire menu. As a result, all pork suppliers are required to meet strict animal welfare standards.

4.8 McDonald's was also one of the first retailers to switch to using free range eggs – which it did back in 1998. Free range eggs are now used in its entire

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menu – including its sauces, muffins and the coating on chicken nuggets. Every year McDonald's use over 100 million free range eggs, sourced from more than 200 UK producers, and for its work in this area they have been awarded 'Food Business of the Year' by the British Free Range Egg Producers Association.

4.9 The strength of McDonald's supply chain – which was clear of any horsemeat – has also been confirmed by Professor Chris Elliott, who said in light of the horsemeat scandal: "McDonald's invited us to look at farms and abattoirs – it was a very simple supply chain. The other thing I was very impressed about was the length of contract McDonald's had with its suppliers."1

5. Conclusion

5.1 It has been highlighted above that there is no appropriate reason to restrict the location or concentration of Hot Food Takeaways due to their perceived impact on health, amenity or perceived clustering.

5.2 It is unsound to introduce such a widespread land use policy which is considered over restrictive of Hot Food Takeaways.

5.3 The proposed approach is in direct conflict with the Framework. The policy attempts to introduce a restriction on the concentration and location of Hot Food Takeaways which is inconsistent with the principles of the Framework, and does not contribute to the overarching principles of sustainable development.

5.4 EC12(1) should refer to the sequential test rather than restricting locations.

5.5 EC12(2) third bullet point should be removed as it is not sound.

5.6 EC12(2) should remove 'our' prior to Town and Local Centres.

Appendix A – There is a lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A class premises.

<p>1. Hot food take-aways are identified as a particular concern, but there is a lack of evidence to inform why A5 units have been identified as a concern over other units, namely A1 and A3 units.</p> <p>2. Research by the Children’s Food Trust for instance found that ‘Once outside school... students faced an environment designed to encourage less healthy food purchasing, mostly from corner shops and supermarkets near to school, outlets which successfully promoted less healthy foods to this population.’²</p> <p>3. The report added ‘this study observed no visits to takeaway outlets’ – although it did qualify this saying a ‘larger, more representative study’ was required to determine whether proposals to restrict A5 outlets are effective in promoting healthier eating habits in teenagers.</p> <p>4. Similarly, research elsewhere found ‘traditional fast food outlets offered a greater variety of healthier breakfast entrees, healthier lunch/dinner entrees, and healthier lunch/dinner side dishes’ than convenience stores, grocery stores, and supermarkets.³</p> <p>5. We therefore assert that sole inclusion of A5 premises is irrational, will not be effective, and is therefore not justified.</p> <p>² Children’s Food Trust, Page 9, November 2011 - http://www.childrensfoodtrust.org.uk/assets/research-reports/journey_to_school_final_findings.pdf</p> <p>³ Jennifer S Creel et al. Availability of healthier options in traditional and non-traditional rural fast-food outlets, page 4, 28 November 2008 - http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2614433/pdf/1471-2458-8-395.pdf</p>				
<p>No. I think the consensus of local views on this topic should have a weighting within the Local Plan. If high levels of support or objection to Hot Food Takeaways are provided by local residents this should count significantly in these cases, as these services are supposed to be there for the people and because they are required. So if there is severe objection this should count.</p>	<p>Noted.</p>		<p>Mrs. A Saxby</p>	<p>n/a</p>
<p>Yes</p>	<p>Noted.</p>		<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

Policy Ec13 – Primary and Secondary Frontages

Question 29	NWL Response	Any change required?	Name	Business or organisation name;
Do you agree with our suggested approach to Primary and Secondary Frontages? If not what changes do you suggest? - Please provide further comments;				
Yes	Noted.		Lisa Marron	Resident
What about charity shops.. They are killing the high street	The Local Plan cannot control the number of charity shops as this is not within the remit of the planning system. It can however seek to ensure that shops are the predominant use within our primary shopping frontages, in accordance with the National Planning Policy Framework, as well as seek to have a suitable amount of shopping provision in our secondary frontages.		Mr s Whitehouse	Personal
Yes	Noted.		Nigel Garnham	Packington Nook Residents Association
Yes	Noted.		Mark Chadbourn	Emerald Eye Ltd
Yes	Noted.		Alison Wright	Heather Parish Council
Yes	Noted.		David Harris	Pyrotect Ltd
The Town Council supports the approach to primary and secondary frontages.	Noted.		Karen Edwards, Deputy Town Clerk	Ashby de la Zouch Town Council
Yes	Noted.		Andrew Stone	NA
Yes	Noted.		Trevor Davis	None
Yes	Noted.		Measham Parish Council	Measham Parish Council
Yes	Noted.		Edward Hines	N/A
Yes	Noted.		David Bigby	Private individual
Yes	Noted.		Lance Wiggins	Landmark Planning
Not robust enough to demonstrate to external funders that the mining heritage is integral to Coalville's strategy in the future.	All policies in the plan have to be read together. A variety of work has been undertaken to date that recognises and supports the value of Coalville's heritage, including the designation of the Conservation Area and the Shopfront Improvement Scheme. Policy He1 seeks to conserve and enhance the district's historic environment and heritage asset. The Council has and will continue to work with Historic England and other relevant stakeholders, on such matters.		Ruth Hamm	teacher
Yes	Noted.		Mr. j Lewis	1950
Yes	Noted.		Steve Johnson	YYYY
Yes	Noted.		Lesley Birtwistle	not applicable
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Tim Abbott	Householder
Yes	Noted.		Heather Parish Council	Heather Parish Council
No	Noted.		JON WALTERS	LPT
Yes	Noted.		Alison Saxby	N/A
In principle the Labour Group will support proposed policy Ec13	Noted.		Sue McKendrick	Labour Group leader

<p>In Ec13 (1) what is an 'over-concentration' of non-shopping uses and how can a prospective applicant determine the likelihood of his application succeeding based on such a vague proposition?</p>	<p>It would not be appropriate for the Local Plan to be prescriptive in terms of numbers of what would result in an over concentration of non-shopping uses. This would depend upon the individual location and circumstances, for example, the size of the primary frontage and the centre, the number and location of existing non-shopping uses.</p> <p>Having regard to comments made under Policy Ec11 it is agreed that there is duplication between Ec11 and Ec13. It is considered that it would be appropriate to delete the Primary and Secondary Frontages as they add little.</p>	<p>Delete policy Ec13</p>	<p>Roger Etchells</p>	<p>Roger Etchells & Company</p>
<p>Yes?</p>	<p>Noted.</p>		<p>C Tandy</p>	<p>Ashby de la Zouch Civic Society</p>
<p>Yes</p>	<p>Noted.</p>		<p>Mrs. A Saxby</p>	<p>n/a</p>
<p>Yes</p>	<p>Noted.</p>		<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

Policy Ec14 – Local Centres

Question 30 Do you agree with our suggested approach to Local Centres? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes	Noted.		Lisa Marron	Resident
Yes	Noted.		Mr s Whitehouse	Personal
Yes	Noted.		Nigel Garnham	Packington Nook Residents Association
Yes	Noted.		Mark Chadbourn	Emerald Eye Ltd
Yes	Noted.		Alison Wright	Heather Parish Council
	Noted.		David Harris	Pyroprotect Ltd
Yes	Noted.		Andrew Stone	NA
Yes	Noted.		Trevor Davis	None
Yes	Noted.		Measham Parish Council	Measham Parish Council
Yes	Noted.		Edward Hines	N/A
Yes	Noted.		David Bigby	Private individual
Yes	Noted.		Lance Wiggins	Landmark Planning
Yes	Noted.		Mr. j Lewis	1950
Yes	Noted.		Steve Johnson	YYYY
I think 6 months is too short a time to allow for marketing shopping or premises used for other main town centre uses before planning permission for other uses will be considered. 12 months would be more realistic.	Noted. Policy Ec14 seeks to ensure the loss of shopping and other main town centres in our Local Centres does not undermine the local character of these centres. The time for which premises should be vacant seeks a balance between having an empty unit within a Local Centre and the financial burden on the owner on the premises, in terms of funding a vacant unit. It is considered that 12 months could be too long a period for premises to be vacant.		Lesley Birtwistle	not applicable
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Tim Abbott	Householder
Yes	Noted.		Heather Parish Council	Heather Parish Council
Yes	Noted.		JON WALTERS	LPT
Yes	Noted.		Alison Saxby	N/A
. Yes. KPC are keen to maintain retail uses and is mindful of the potential disproportionate effect of the Roxhill development on the centre of Kegworth.	Noted.		Vicky Roe	Kegworth Parish Council

<p>(a) The Labour Group recognise that there needs to be an element of Planning pragmatism.</p> <p>(b) There is much criticism from the streets about repetitive and similar charity retail outlets on our High Streets. These outlets are important fundraisers for individual charities. The Local Planning Authority could be more proactive in encouraging the charities' offer to be more imaginative and to improve their retail choice?</p>	<p>Noted. However the suggested actions raised are outside of the remit of the planning system. The Local Plan cannot control the number of charity shops as this is not within the remit of the planning system. It can however seek to ensure that shops are the predominant use within our primary shopping frontages, in accordance with the National Planning Policy Framework, as well as seek to have a suitable amount of shopping provision in our secondary frontages.</p>		<p>Sue McKendrick</p>	<p>Labour Group leader</p>
<p>Yes</p>	<p>Noted.</p>		<p>C Tandy</p>	<p>Ashby de la Zouch Civic Society</p>
<p>Yes</p>	<p>Noted.</p>		<p>Mrs. A Saxby</p>	<p>n/a</p>
<p>Yes</p>	<p>Noted.</p>		<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

Policy Ec15: Tourism and cultural development

Question 31 Do you agree with our suggested approach to Tourism and Cultural development? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes	Noted.		Lisa Marron	Resident
Yes	Noted.		Mr s Whitehouse	Personal
<p>The approach is unambitious and limiting in scope. Encouragement of tourism requires the provision of good public transport, higher quality hotels and accommodation, which the Authority should promote in its policies.</p> <p>A particular benefit for the improvement of access to Hicks Lodge cycle centre, for example, would be the provision of orthodox cycle routes from Ashby town centre to reduce the likelihood that people will travel there by car.</p>	<p>The Local Plan seeks to facilitate the provision of new cycling links, especially as part of development. Work is currently being undertaken on a draft Ashby Cycle Strategy, work which is being led by Leicestershire County Council.</p>		Nigel Garnham	Packington Nook Residents Association
<p>Page 82, policy Ec15. We support this policy provided it is not about preventing tourism development on farms which are not near bus stops.</p>	<p>Noted. Tourism in rural areas is supported and each proposal would be considered on its merits taking into account a range of issues including scale, traffic implications, impact on transport infrastructure as well as any economic benefits.</p>		Paul Tame	NFU
Yes	Noted.		Mark Chadbourn	Emerald Eye Ltd
Yes	Noted.		Alison Wright	Heather Parish Council
<p>pg 81 para 7.81 Local museums should also be mentioned, for example Ashby de la Zouch and Castle Donington museums.</p>	<p>It would be useful to include reference in the text to local museums as these are an example of cultural facilities. However in terms of cultural matters the National Planning Policy Framework includes such facilities along with community facilities. It is therefore suggested that cultural development be addressed under Policies IF1 and IF2, alongside community facilities, rather than Policy EC15.</p>	<p>Amend Policy EC15 to remove reference to cultural development. Amend Policies IF1 and IF2 to include reference to cultural development and facilities. Make reference to museums in the supporting text to Policy IF2.</p>	Gerald Dalby	NA

<p>Page 81 - Item 7.81</p> <p>Obviously written by someone who doesn't know the area very well? The two largest tourist attractions are not mentioned. The Manor House at Donington Le Heath is the second most visited historical site in the County (behind Bosworth Field) and an even larger tourist attraction is the National Forest cycle centre at Hicks Lodge.</p> <p>Item 7.83</p> <p>Sadly the council didn't work hard enough or even support the battle to preserve the Snibston Discovery Park. This item should be removed as it's untrue.</p>	<p>The supporting text provides examples of tourist facilities within the district and is not exhaustive. The policy applies to all such facilities and seeks to support and facilitate such development in the district. In terms of Snibston Discovery Park are noted however this was and is beyond the remit of the Local Plan. The decision to close Snibston was made outside of the planning system.</p>		<p>Steve Palmer</p>	<p>NA</p>
<p>N/A</p>	<p>Noted.</p>		<p>Samantha Lockwood</p>	<p>Long Whatton and Diseworth Parish Council</p>
<p>Policy Ec15 does not go far enough in encouraging tourism and should be actively promoting the provision of good public transport and higher quality accommodation. It should also seek to enhance access to the National Forest by creating new public rights-of-way where possible and a cycle route from Ashby Town Centre to the Hicks Lodge Cycle Centre via fields off Willesley Lane to avoid the narrow and winding route of Willesley Lane. Specific reference to the Hicks Lodge National Forest Cycle Centre should be included in Paragraph 7.81.</p> <p>The re-opening of the Ivanhoe Line (National Forest Railway Line) to passengers would further increase tourist numbers to the area making access to the National Forest and other attractions without a vehicle feasible.</p>	<p>Policy EC15 seeks to support and facilitate tourism development within the district. The supporting text provides examples of tourist facilities within the district and is not exhaustive. However a number of the issues raised are not within the remit of the Local Plan. For example, other strategies implement and promote the provision of accommodation, for example, the Tourism Strategy for Leicester and Leicestershire and its accompanying Action Plan (2012-2016).</p> <p>The Local Plan seeks to facilitate the provision of new cycling links, especially as part of development. Policy IF5 supports the reinstatement of passenger services on the Leicester to Burton rail line.</p>		<p>Frank Bedford, MBE</p>	<p>Willesley Environment Protection Association</p>
<p>Promote it.</p>	<p>Noted.</p>		<p>None</p>	<p>none</p>
<p>Yes</p>	<p>Noted.</p>		<p>David Harris</p>	<p>Pyrotect Ltd</p>
<p>The Town Council supports this approach which echoes the proposals within the draft Neighbourhood Plan.</p>	<p>Noted.</p>		<p>Karen Edwards, Deputy Town Clerk</p>	<p>Ashby de la Zouch Town Council</p>
<p>Tourism and cultural development within NW Leicestershire is supported.</p>	<p>Noted.</p>		<p>Angela Cornell</p>	<p>Fisher German</p>
<p>Yes</p>	<p>Noted.</p>		<p>Andrew Stone</p>	<p>NA</p>

<p>Current facilities frequently do not take the opinions of local users into account, and often cater for people arriving by car rather than local people who want to walk, ride or cycle. Visitors appear to get priority over local people.</p> <p>The loss of Snibston Discovery Park is a major blow for the area and implies a lack of interest in, and commitment to the Coalville area.</p>	<p>Policy supports tourism provision which includes the development of well connected destinations and amenities, particularly by public transport, walking and cycling. It is recognised that there are a range of users, day visitors, the local population and overnight visitors, and all would benefit from new and improved facilities.</p> <p>Policy EC15 seeks to support and facilitate tourism development within the district. The comments in respect of Snibston Discovery Park are noted however this was and is beyond the remit of the Local Plan.</p>		Mary Lorimer	Not applicable
Yes	Noted.		Trevor Davis	None
<p>Disappointed by the closure of Snibstone Discovery Park. Public transport to many local attractions is non-existent from rural areas.</p>	<p>Policy supports tourism provision which includes the development of well connected destinations and amenities, particularly by public transport, walking and cycling. Sustainable travel links are sought as part of new development. Policy EC15 seeks to support and facilitate tourism development within the district. The comments in respect of Snibston Discovery Park are noted however this was and is beyond the remit of the Local Plan. The decision to close Snibston was made outside of the planning system.</p>		Measham Parish Council	Measham Parish Council
Yes	Noted.		Edward Hines	N/A
Yes	Noted.		David Bigby	Private individual
<p>While culture is mentioned, the supporting text or policy do not actually mention the District's valued cultural facilities.</p> <p>The importance of planning for culture and cultural facilities is emphasised in the National Planning Policy Framework as one of the twelve core planning principles (item 17). Item 156 requires local plans to include policies for the 'provision of health, security, community and cultural infrastructure and other local facilities'. This is supported by guidance in item 70 of the NPPF which states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should 'guard against unnecessary loss of valued facilities'. Also to ensure that established facilities and services are retained and able to develop for the benefit of the community.</p> <p>The Planning Practice Guidance notes that a range of issues could be considered through the plan-making and decision-making processes including social and cultural well-being. This takes the matter further than just access to doctors and playing fields. 'Well-being' is having a sense of satisfaction with life. Social and cultural well-being includes the un-measurable personal experiences that make us</p>	<p>The contents of Para 70 are noted and are reflected within the criteria contained within Policy IF2 that deals with the matter of community facilities. The NPPF also refers to cultural facilities alongside community facilities. It is therefore suggested that cultural development be addressed under Policies IF1 and IF2 alongside community facilities, rather than Policy EC15.</p>	<p>Amend Policy EC15 to remove reference to cultural development. Amend Policies IF1 and IF2 to include reference to cultural development and facilities.</p>	Ross Anthony	The Theatres Trust

<p>happy and content. Such experiences are intangible, not financially rewarding, and can either be active (sports) or passive (theatre). The provision of a variety of community infrastructure and cultural facilities are vital for their contribution to residents and visitors life satisfaction and this should be promoted in this document.</p> <p>It is therefore important the local plan safeguard and protect existing cultural & community facilities to benefit and support sustainable communities, as these facilities are usually most at risk of being traded in for more commercially lucrative developments.</p> <p>In order to reflect item 70 of the NPPF and be found 'sound' during examination, the Trust recommends amending this policy to include:</p> <p>The council will resist the loss or change of use of existing cultural facilities unless replacement facilities are provided on site or within the vicinity which meet the need of the local population, or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision, and it has been demonstrated that there is no community need for the facility or demand for another community use on site.</p> <p>The Policy should also contain criteria for encouraging the provision of new facilities to serve the growing population in the District.</p> <p>Alternatively, policy IF2 could be amended to include cultural facilities. See our response to question 35.</p>				
Yes	Noted.		Lance Wiggins	Landmark Planning
The National Forest Company supports this Policy and welcomes the recent changes made. We request that paragraph 2 is amended to specifically refer to The National Forest - 'It is recognised however that there may be instances, such as within The National Forest, where an initiative requires a countryside location...'	The suggested additional text is not considered to be needed. The existing proposed wording will suitably address those circumstances when National Forest development is sought in the countryside.		Philip Metcalfe	The National Forest Company

<p>Why is Snibston not mentioned? Seems very odd that the main tourist attraction in Coalville in the past is ignored. NWL should be looking at ways it can work with agencies to celebrate the industrial heritage of NWL in Coalville .There needs to be a policy to engage straightaway with Arts Council, Heritage Lottery, English Heritage to develop a plan for this involving local players and using external funding. Can the council talk to the Land Trust and the county about the Snibston site, like Pleasley.</p> <p>This links in with the comments in townscape heritage (above). The draft Plan is lukewarm on tourism and cultural development and is not strong enough to be taken seriously by those with funding.</p>	<p>The supporting text provides examples of tourist facilities within the district and is not exhaustive. The policy applies to all such facilities and seeks to support and facilitate such development in the district. The comments in respect of Snibston Discovery Park are noted however this was and is beyond the remit of the Local Plan. The decision to close Snibston was made outside of the planning system.</p>		Ruth Hamm	teacher
<p>The Plan claims "We will maximise the potential of tourism in the District and increase tourist opportunities for visitors by supporting the retention of existing tourist attractions and accommodation which contribute to the local economy."</p> <p>Why should anyone believe that statement? This authority sat by and watched the closure of Snibston Discovery Museum, which provided £4.2M to the local economy. The complicity of the political leadership in this act of institutional vandalism suggests these are merely warm words.</p> <p>For the same reason, why should anyone believe this Plan would support the "Enhancement of existing tourist attractions"? As I have pointed out in response to the Heritage question, this Local Plan studiously ignores the heritage of Snibston and Coalville.</p>	<p>The supporting text provides examples of tourist facilities within the district and is not exhaustive. The policy applies to all such facilities and seeks to support and facilitate such development in the district. The comments in respect of Snibston Discovery Park are noted however this was and is beyond the remit of the Local Plan. The decision to close Snibston was made outside of the planning system.</p>		Theresa Eynon	alderoak
<p>Policies do not recognise the scale and potential that the National Forest and its new long-distance trail have for step-changing tourism in the District. Much more should be done to encourage enhancements to the visitor experience.</p>	<p>Policy Ec15 supports the National Forest's role as a tourism facility. Furthermore Policy EN3 deals specifically with the National Forest recognising and supporting its role and its benefits, including its offer as a tourism and leisure destination. The Council will work positively with The National Forest Company and other relevant partners.</p>		Michael Ball	Individual

No mention of Snibston there then!	Support is noted. The supporting text provides examples of tourist facilities within the district and is not exhaustive. The policy applies to all such facilities and seeks to support and facilitate such development in the district. The comments in respect of Snibston Discovery Park are noted however this was and is beyond the remit of the Local Plan. The decision to close Snibston was made outside of the planning system.		Steve Johnson	YYYY
Yes	Noted.		Lesley Birtwistle	not applicable
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Hugh James	n/a
Support for Ec15 1) in respect of retention and enhancement of existing accommodation and development of new (but not necessarily restricted to town centres). Also support 1) d and e) especially as it relates to Royal Hotel and site of former Ivanhoe Baths - spatial relationship of Hotel, Rawdon Terrace and Bath Grounds with prospect of a 'pavilion' to re-establish the 'presence' of the demolished Baths.	Noted.		Tim Abbott	Householder
Bring back a Snibston style discovery park and build it in the empty beautiful Victorian factory at Mantle Lane (recently set fire to). This could be a wonderful facility and right at the heart of the shopping district. With the new money raised from Business rates we should be able to find the funding. This will bring a beautiful historic building back into use and expand the museum significantly as it has several floors.	The decision to close Snibston Discovery Park was made outside of the planning system and was not and is not within the remit of the Local Plan. The Local Plan is a land use based planning document which provides a framework for decisions on proposals for development. The property referred to at Mantle Lane is understood to be in private ownership although and that it will shortly brought back into use.		Jane Tebbatt	Quarrying
Yes	Noted.		Heather Parish Council	Heather Parish Council
No	Noted.		JON WALTERS	LPT
Yes	Noted.		Alison Saxby	N/A
No. Although Donington Park is identified as a major destination the plan does not support public transport links to the Park. As transport links are generally poor KPC considers that NWLDC should support local facilities via community infrastructure levies to enable initiatives such as Centre Stage / Centre Screen to be made available locally.	Criteria 1 (c) of Policy Ec8 can be applied which requires improvement in public transport access to the racetrack in relation to any further expansion. Any contributions sought through section 106/CIL must meet the relevant CIL criteria. However policy can only be applied and contributions sought when planning permission is needed for development and can only seek to address issues raised as a result of the proposed development, not existing issues .		Vicky Roe	Kegworth Parish Council

<p>PA@CT is a voluntary organisation with members drawn from across North West Leicestershire with the purpose of promoting high quality performing arts and cinema in the area and as delivered through the Century Theatre in Coalville.</p> <p>Lord Egan’s report on sustainable development to Government stressed the need to recognise and address a wide range of infrastructure and service issues in order to achieve robust, cohesive and sustainable communities. Alongside well established needs such as employment, transport, education and health, lord Egan’s report was clear that communities equally need access to pursue cultural and heritage related interests.</p> <p>Published in the 90’s, Lord Egan’s report has now become an underpinning influence in best practice in regeneration and development and the need to give due prominence to the cultural needs of communities has been further underpinned by successive research commissioned by the Arts Council, English Heritage, CABE and others.</p> <p>With the increases in housing and land available for employment enabled by the proposed local plan, we urge the District Council to also create, within the plan, a focus on cultural and heritage development. This perhaps should be focussed on Coalville, which with the closure of Snibston, is currently experiencing a decline in its cultural offer.</p> <p>The Century Theatre and potential attractions to be developed around Snibston pit headstocks offer a nucleus around which a cultural centre could be developed. Century Theatre currently attracts audiences of over 1200 people per annum with a growing “offer” for local mainstream and dance schools. Our programme has increased dramatically over the last two years and we are now able to attract nationally significant acts; comedians Alan Carr, and Alistair McGowan, drama such as Yorkshire Playhouse’s “Beryl”. Our “professional programme” is supplemented by a variety of community focussed events including work with the East Midlands Marathi Association to run a programme of Asian Language films. For many local groups we offer a unique opportunity for young people to experience, for the first time, the discipline of performing in a real, live theatre environment.</p>	<p>The decision to close Snibston Discovery Park was made outside of the planning system and was not and is not within the remit of the Local Plan. The contents of Para 70 are noted and are reflected within the criteria contained within Policy IF2 that deals with the matter of community facilities. The NPPF also refers to cultural facilities alongside community facilities. It is therefore suggested that cultural development be addressed under Policies IF1 and IF2 alongside community facilities, rather than Policy EC15. Heritage issues are dealt with by Policy He1, which will seek to ensure that development proposals have a positive role to play in the conservation and enhancement of the district's environment.</p>	<p>Amend Policy EC15 to remove reference to cultural development. Amend Policies IF1 and IF2 to include reference to cultural development and facilities.</p>	<p>Evan Rees</p>	<p>Performing Arts at Century Theatre</p>
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<p>The Century Theatre itself is a unique structure, probably the only one of its kind in the world, being a theatre designed to be transportable by road. It has a unique heritage, being built locally and having provided a stage for actors of the calibre of Dame Judi Dench and Helen Mirren. Alan Ayckbourn was a patron and funding support came from a long list of prominent people including Agatha Christie, Enid Blyton, and Augustus John.</p> <p>This nucleus, if supported by appropriate enhancement of the surrounding environment, improved infrastructure and the development of further heritage and culture focussed services, has the potential to bring a culturally led aspect to the development of the District.</p> <p>We believe that, as it stands, the Local Plan fails to adequately address the cultural needs of the District. As well as failing to reflect local needs, this fails to recognise the spirit of national planning policy guidance.</p> <p>Whilst PA@CT generally supports the policy statements under E15 – Tourism and Cultural Development – we are concerned that the Local Plan doesn't address the cultural needs particularly of Coalville, having regard to the closure of Snibston Discovery Museum. Cultural issues should be added as a policy strand in parallel with the tourism policies.</p> <p>Our suggestion for addition to the Local Plan is:</p> <p>(1) We will support the development and diversification of cultural facilities within the District and increase the cultural experiences available to local people and visitors by supporting the:</p> <p>(a) Retention of existing cultural sites, premises and attractions and by resisting other development in the vicinity that would be incompatible or would undermine the attractiveness, viability or functioning of the cultural facility and its activities;</p> <p>(b) Enhancement of existing cultural attractions, including their expansion, where it accords with the principles of sustainable development and is not detrimental to the surrounding area;</p>				
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<p>(c) Development of new cultural and entertainment facilities within the Limits to Development, particularly within the principal urban areas accessible by public transport, in order to provide for the needs of the existing and planned population, provided such development would be in accordance with the principles of Sustainable Development and would not be incompatible with surrounding land uses or the character of the area</p> <p>(2) When assessing new provision or the expansion of facilities, consideration will be given to whether needs can be met on existing sites or by existing facilities.</p>				
<p>(a) Assuming the wording of proposed Policy Ec15 reflects the genuine wish of the Conservative Administration then no one should object.</p> <p>(b) But taking the assumption that past actions will reflect future actions, the Labour Group has no trust that proposed Policy Ec15 will ever be used. The Leicestershire County Council Conservative Group have closed and removed £4.2m from the NWL economy by closing a much loved Snibston Discovery Museum.</p> <p>(c) The problem we have is that the same councillors who are recommending policy Ec15 for the NWLDC Local Plan are the same Councillors who voted for the closure of Snibston Discovery Museum.</p>	<p>The decision to close Snibston was made outside of the planning system and was not and is not within the remit of the Local Plan. The National Planning Policy Framework however refers to cultural facilities alongside community facilities. It is therefore suggested that Policy EC15 be amended to relate solely to tourism development and cultural development is moved to be dealt with under Policies IF1 and IF2.</p>	<p>Amend Policy EC15 to remove reference to cultural development. Amend Policies IF1 and IF2 to include reference to cultural development and facilities.</p>	<p>Sue McKendrick</p>	<p>Labour Group leader</p>

<p>Support for the development and expansion of tourism is welcomed although the detailed wording of the policy appears to be overly restrictive and not in accordance with the National Planning Policy Framework. The policy should be re-worded to set out the circumstances under which the Council will grant planning permission rather than simply state that it will support such development.</p> <p>Ec15(2) needs to be amended to support proposals for tourist attractions and accommodation outside limits to development where they would make use of existing resources (such as the re-use of existing land and buildings for a project that is not directly related to a specific tourist destination or requires a countryside location).</p> <p>Ec15(3) needs to be amended to better define what is meant by the term "sustainable tourism" in rural areas.</p> <p>Ec15(4) effectively requires applicants to demonstrate the need for their proposals although there is no corresponding test in the National Planning Policy Framework. This approach is overly restrictive and Ec15(4) should be deleted.</p>	<p>Para 28 of the NPPF advises that local plans should support sustainable rural tourism, that would be of benefit to businesses in rural areas, communities and visitors and which respect the character of the countryside. Policies should support the provision and extension of such facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres. The positive wording of Policy Ec15 seeks to reflect the approach contained within the NPPF and overall is not considered to be restrictive. It is agreed however that it would be beneficial to make reference to the re-use of land or buildings for a tourism related development under Ec15 (2) but not for non tourism related development. This scenario would be addressed by Policy S4 and any identified related policy, depending on the development. Sustainable tourism is generally that which has a low impact on the environment, whilst generating income and employment for the local economy, with a positive impact on the visitor/user. As these matters are identified within Policy Ec15 (3) it is considered that it is not necessary to use the word sustainable. Policy EC15(4) reflects the wording of Para 28 of the NPPF but for clarification it would be useful to specify this criteria is in relation to rural tourism.</p>	<p>Ec15 (2) - reference to be made to the re-use of land/buildings for tourism and tourism related development. Ec15 (3) - delete the word 'sustainable' in the context of 'sustainable tourism'. Ec15 (4) - insert reference to rural tourism.</p>	<p>Andrew Thomas</p>	<p>Thomas Taylor Planning</p>
<p>The Plan claims "We will maximise the potential of tourism in the District and increase tourist opportunities for visitors by supporting the retention of existing tourist attractions and accommodation which contribute to the local economy."</p> <p>Why should anyone believe that statement? This authority sat by and watched the closure of Snibston Discovery Museum, which provided £4.2M to the local economy. The complicity of the political leadership in this act of institutional vandalism suggests these are merely warm words.</p> <p>For the same reason, why should anyone believe this Plan would support the "Enhancement of existing tourist attractions"? As I have pointed out on in response to the Heritage question, this Local Plan studiously ignores the heritage of Snibston and Coalville.</p>	<p>The decision to close Snibston Discovery Park was made outside of the planning system and was not and is not within the remit of the Local Plan.</p>		<p>Mrs Kurpil</p>	<p>NA</p>
<p>Yes</p>	<p>Noted.</p>		<p>C Tandy</p>	<p>Ashby de la Zouch Civic Society</p>
<p>Policy EC15 is supported by the National Trust.</p>	<p>Noted.</p>		<p>Kim Miller</p>	<p>National Trust</p>

<p>Policy IF1 does not appear to be underpinned by an appropriate quantity of evidence. For example, the supporting text to the policy states that the Council has prepared an Infrastructure Delivery Plan (paragraph 8.8). However, this is not included as appendix to the plan or available as a standalone document. Without it, it is impossible for us to determine whether the infrastructure items are sound, or comment on costs, delivery timescale, and necessity.</p> <p>In addition, the Policy is not consistent with the law and policy on planning obligations (CIL Regulations Section 122 and 123 and NPPF paragraphs 203-205). It does not for example contain reference to the statutory tests applying to planning obligations or the specific circumstances in which the pooling of contributions will be lawful.</p> <p>As currently drafted, Policy IF1 is not therefore legally compliant or sound.</p>	<p>Response dealt with under policy IF1 (question 32)</p>		<p>Tim Evans</p>	<p>Bilfinger GVA</p>
<p>The Plan claims "We will maximise the potential of tourism in the District and increase tourist opportunities for visitors by supporting the retention of existing tourist attractions and accommodation which contribute to the local economy."</p> <p>Why should anyone believe that statement? This authority sat by and watched the closure of Snibston Discovery Museum, which provided £4.2M to the local economy. The complicity of the political leadership in this act of institutional vandalism suggests these are merely warm words.</p> <p>For the same reason, why should anyone believe this Plan would support the "Enhancement of existing tourist attractions"? As I have pointed out on in response to the Heritage question, this Local Plan studiously ignores the heritage of Snibston and Coalville.</p>	<p>The decision to close Snibston Discovery Park was made outside of the planning system and was not and is not within the remit of the Local Plan.</p>		<p>Mr B Carter</p>	<p>n/a</p>
<p>Yes</p>	<p>Noted.</p>		<p>Mrs. A Saxby</p>	<p>n/a</p>
<p>Yes but should make reference to local museums.</p>	<p>It would be useful to include reference to local museums in the supporting text as these are an example of cultural facilities. However in terms of cultural matters the National Planning Policy Framework includes such facilities along with community facilities. It is therefore suggested that cultural development be addressed under Policies IF1 and IF2, alongside community facilities, rather than Policy EC15.</p>	<p>Amend Policy EC15 to remove reference to cultural development. Amend Policies IF1 and IF2 to include reference to cultural development and facilities. Make reference to local museums in the supporting text to Policy IF2.</p>	<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

<p>Reference within Policy Ec15 Tourism and Cultural Development is welcomed.</p> <p>It is disappointing that a policy relating to shopfronts and advertisements has not been included. Shopfronts and advertisements are intrinsic to the success of town centres and the protection and enhancement of heritage assets, such as town centre Conservation Areas. In accordance with our previous advice supporting text to 'set the scene' such as :-</p> <p>"The overall visual character of Ashby de la Zouch is predominately of a Georgian /early Victorian townscape. The area does, however, also portray earlier patterns of growth and at its periphery contains some later nineteenth century buildings. the area essentially relates to the extent of the built form of the town centre at the end of Ashby period as a spa resort.</p> <p>The shop fronts within the commercial area are predominately of late nineteenth century, often inserted into former dwellings of an earlier date. They typically have a stall riser below their display window along with architrave, fascia and cornice above. Many premises also have pilasters which frame the overall shop frontage and a number retain elaborate consoles.</p> <p>The installation of late twentieth century shop fronts to earlier buildings have to some extent undermined the character of the commercial shopping area.</p> <p>With regard to advertisement signage to traditional shop frontages, the introduction of signs which project beyond facias, the installation of internally illuminated box and fascia signs and the use of means of illumination such as cowl lamps or projecting strip lighting are all considered to have been detrimental to the streetscape.</p> <p>Due to the overall character and historic interest of the core shopping area within Ashby de la Zouch it is important to conserve, protect and enhance where appropriate the historic shop fronts.</p> <p>And a dedicated policy such as:-</p>	<p>Noted. However it is suggested that it would be more appropriate to deal with these comments under Policy HE1.</p>		<p>Emilie Carr</p>	<p>Historic England</p>
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<p>a) retain existing historic shop fronts and features of architectural and historic interest;</p> <p>b) Respect the scale, proportions, character and materials of the whole building and where appropriate, adjoining buildings and the wider street scene;</p> <p>c) Incorporate materials appropriate to the age and character of the buildings; and</p> <p>d) Have regard to the guidance on shop fronts and signage"</p> <p>Would help to ensure the protection and enhancement of shop fronts.</p>				
<p>Suggest the inclusion of, 'To also encourage more sustainable forms of transport' (which includes public transport, walking and cycling).</p>	<p>Comments are noted. However it not considered necessary to include this text as there is reference to encouragement and utilisation of sustainable forms of transport throughout the policy.</p>		<p>Grant Butterworth</p>	<p>Leicester City Council</p>