



North West Leicestershire Draft Local Plan September 2015

North West Leicestershire Labour Group Response
to Consultation Questions

30th November 2015

Labour Group response to the DRAFT North West Leicestershire Local Plan November 2015

The Labour Group would firstly like to acknowledge and say thank you to the officers for their hard work in preparing the draft Local Plan. It is an extensive document that would have required significant time and effort.

In our response to this draft plan we have endeavoured to be open, honest and fair.

There are positives in the plan with recognition of the need to provide more housing that is affordable and increasing employment opportunities in the district whilst preserving some important areas of green space.

Within the response we have indicated our concerns about the numbers of affordable housing needed, where new employment is in relation to where people live and the re-designation of countryside to 'open space'.

It's disappointing that the Plan fails to provide an overall vision for the district; It's difficult to visualise what this district will look like and feel like to those that live in, work in or visit the district by the end of this plans life, 2031.

Underpinning the plan to provide housing and employment is the need to provide a sound infrastructure, one that is capable of supporting development safely and economically.

Plans to provide more housing and more employment without robust transport systems in place and without a road network that provides safe, economic travel to and from the places people need to be, when they need to be there will fail the people it represents.

It's in everyone's interest to produce a Plan that works, that will be seen as credible and one that is in the best interests of everyone in the district whatever background or circumstances.

Sue McKendrick

Leader Labour Group

NWLDC

30th November 2015

North West Leicestershire District Council Labour Group

Group Response to draft Local Plan Consultation and Questions

Preface

Question numbers reflect the questions asked by NWLDC in a draft document issued in September 2015. This document can be found here:

http://www.nwleics.gov.uk/files/documents/north_west_leicestershire_local_plan_draft_for_consultation_september_20151/Final%20Draft%20September%202015.pdf

Question text is shown on this paper in italics and Group response is below the text '**Labour Group Response**' following each question.

All 53 Questions have been answered.

Answers to Questions

Question 1

Are there any other issues which the Local Plan has not identified? If so what are these and what is the evidence to support it?

Labour Group Response

1. Lack of any Specific detail on how the Plan is to be achieved, timetabled & delivered within the Plan Period. Evidence - Document text is paraphrased throughout with 'seek to deliver' without specific direct accountability to show the community how it will be achieved.
2. Lack of identification & clarity on all infrastructure needs from highways, public transport, education, NHS to utility upgrades. Evidence – draft Local Plan simply indicates 'seek to' rather than third party agreement on specific detail.
3. The 2011 Census there were 16,930 people in NWL whose day to day activities are limited by disability. This was an increase of 11% since 2001. Demographic change suggests the figure will increase further over the plan period. The draft Local Plan shows no evidence of planning for the housing and employment needs of an ever growing ageing population with multiple disabilities. Evidence – no discussion within document
4. Lack of identification of Social Housing needs. There are over 800 persons (and growing) on the Council's 'waiting list'. Evidence – the draft rattles on about 'affordable housing' but does not reflect the needs of those who cannot afford or obtain a mortgage. Nor does it identify land within the draft to build new social housing.
5. Lack of 'joined up thinking' or continued 'silo working' both internally within the Council and with external bodies. Evidence – lack of public and accountable coordination with the Council's proposed Housing Strategy or the so called 'Coalville Project' etc.

Question 2

Do you agree that the identified strategic objectives are appropriate for North West Leicestershire? Should any changes be made? If so, please identify what changes should be made.

Labour Group Response

We do not agree. The Labour Group consider that the draft Local Plan is a developer's charter that views housing as a commodity and emphasises 'market needs' without taking into account the needs of our communities for homes they can afford to live in.

Evidence

- (a) Areas of need not identified in our villages and local centres.
- (b) Lack of identification of areas that need local services.
- (c) Lack of identification for larger areas of communal space & community centres etc.
- (d) No Cinema, no railway stations or decent public transport. No attempt to reverse the need to travel out of District for leisure activities.
- (e) No provision for the needs of frail, elderly and disabled residents for affordable accessible housing.

Question 3

Do you agree that the preferred approach provides a good basis for applying the presumption in favour of sustainable development? If not, what changes do you suggest?

Labour Group Response

English Local Government politicians will always be required to consider Whitehall instructions through or associated with the NPPF. The draft Policy S1 speaks about 'being proactive with developers' first and only secondly to 'involve local communities in shaping 'development proposals'. This is quite simply the wrong way round. The Council needs to be 'proactive', putting communities and their needs first and influencing developers so that they meet those requirements.

Evidence

- (a) 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.
- (b) Erroneous and unclarified use of the word 'sustainable'. Many of the proposed development sites are clearly 'un-sustainable' due to the lack of identification of (all) infrastructure needs and costs.
- (c) Lack of proper involvement to encourage communities to look at their development needs over the Plan Period.

Question 4

Do you agree with the amount of housing development we propose to make provision for? If not what changes do you suggest?

Labour Group Response

The Labour Group are sanguine with a figure of 10,700 new homes (policy S2) over the Plan Period. However, we will point out:

- (a) Objections to jobs and homes are being planned at opposite ends of district. This is unsustainable to those who cannot afford or choose to have personal transport. The Sky bus is of no use to most areas of southern/western NWL. The jobs at the Airport Jobs are inaccessible to people who cannot drive due to disability or low income.
- (b) The number of Planning Permissions given over the last few years for new housing more or less equates to the number of homes required. Whitehall now require evidence that land identified for housing will be able to 'deliver' new housing within the Plan Period. The Labour Group are not convinced that many of the planning permissions given will be delivered within the Plan Period due to 'market conditions'.
- (c) More land will need to be identified to guarantee to Whitehall the deliverability of new homes within the Plan Period. No doubt this will be contentious with many communities and the need for community engagement will be urgent if the Council is to meet the 2017 deadline for approval of the Local Plan by the Secretary of State (SoS)
- (d) The Labour Group considers that any rush to identify additional land from the SHLAA to satisfy new guidance on 'deliverability' will mean more speculative bids from developers to put their land in the local plan. The Labour Group are sympathetic to objections from Ashby residents to 'additional land' being made available at Money Hill
- (e) We question why this council has not taken up the Government's position on building a new freestanding Garden Village? This option needs to be seriously considered. A site could be found that will not overwhelm existing larger settlements. A situation close to the trunk road network would be convenient for the commuters who appears to be this council's priority.
- (f) The former and abandoned Regional Spatial Strategy (RSS) identified new housing requirements for Leicestershire in 2005. NWLDC in 2006 opted for Option 2b – which considered that around 12,500 new homes were required. In 2015 we are not far off that original figure.

Suggested Changes. Zone new housing and employment within easy walking distance of each other.

Question 5

Do you agree with the amount of employment development we propose to make provision for? If not what changes do you suggest?

Labour Group Response

'The Market' has applied for a considerable number of Planning Permissions within NWL for employment use. Many have not been 'delivered' and some remain grossly underutilised. Many of these sites lie abandoned and blight our communities.

NWLDC continues to allow speculative employment permissions in the Northern Parishes rather than pro-actively directing employment development to sites already approved.

The Labour Group remains unconvinced that employment land will be delivered and provided to existing communities in the south of the District. Legislation exists that enables Local Authorities to direct developers, for example designating development zones. This plan does not choose to use the available legislation.

Question 6

Do you agree with the amount of retail development we propose to make provision for? If not what changes do you suggest?

Labour Group Response

- (a) No clear plan. We feel that there is a lack of recognition that there is rapid evolution of retail within Europe due to internet sales and home delivery.
- (b) 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.
- (c) 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.

Question 7

Do you agree with our suggested settlement hierarchy? If not what changes do you suggest?

Labour Group Response

- (a) Settlement hierarchy can be subjective and changes can be rapid due to circumstances outside the Council's control.
- (b) The Labour Group will support Option B as the preferred option
- (c) Blackfordby cannot be designated as a sustainable village when it has no shop. It should be designated a small village until a shop and post office are established. NWLDC should not consider sustainability by relying on South Derbyshire to provide whatever is needed to satisfy developer thirst for more development on the boundary.

Question 8

Do you agree with our suggested approach to development in the countryside? If not what changes do you suggest?

Labour Group Response

- (a) Taking into account positions taken in the past in relation to 'Limit of Development' we have little or no trust in the current administration to sustain Policy S4
- (b) Policy S4 must be legally enforceable during the Plan Period with the definition of 'countryside' clearly understood by both communities and developers.
- (c) We want to see better recognition of the importance of National Forest and control on development in the Charnwood Forest
- (d) Identify as 'countryside' larger areas of communal space such as the Bath Grounds in Ashby, Snibston Grange in Coalville, Lount Woodland etc.
- (e) Identify and protect the most productive agricultural land

Question 9

Do you agree with our suggested approach to the design of new development? If not what changes do you suggest?

Labour Group Response

We have been supportive of the negotiating skills of the Council's Urban Design Consultant.

- (a) We remain critical of the terms 'responsive to context' as many of our diverse communities now 'look' the same.
- (b) Non-motorised 'interconnectivity' has not been sufficiently prioritised. There is no plan to improve connectivity between off-road and Sustrans routes.

Question 10

Do you agree with our suggested approach in respect of how we should deal with housing sites where planning permission lapses? If not what changes do you suggest?

Labour Group Response

- (a) Subject to any changes to the NPPF or its successor, we do not consider draft Policy H1 as being acceptable. It does not take into context changes over the Plan Period into adjacent land use (ie employment, retail or wildlife areas)
- (b) Heritage Finds on adjacent land could significantly change the landscape importance of the former permitted site during the Plan Period.
- (c) Change of Community needs could affect land use on the permitted site.

Question 11

Do you agree with our suggested approach in respect of housing sites with a resolution to grant planning permission? If not what changes do you suggest?

Labour Group Response

- (a) We do not agree.
- (b) Many residents do not regard the Local Plan as priority in their lives and will not have prior knowledge of this issue when they may wish to object to an application.
- (c) Whitehall however are likely to insist that land indicated in a Local Plan will in principle be granted Planning Permission. NWLDC must be accountable to the electorate during the pre-submission stage and make it clear to the public that land shown for development in the Local Plan will in principle be granted planning permission.

Question 12

Do you agree with our proposed housing allocations? If not what change would you suggest?

Labour Group Response

- (a) It's not a simple yes or no answer. The Labour Group recognise that land needs to be made available for new housing – but there has been a failure to engage with communities (large and small) in discussions where the best location is for new housing
- (b) There should a 'brownfield first' policy
- (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.
- (d) The Public Inquiries on the applications at Money Hill will determine an appropriate response to this question.
- (e) Communities are likely to be offered a false choice between Money Hill and the 'Whitwick Green Wedge'. Neither are acceptable and a lot of political energy will be wasted on this debate. We should be looking at other solutions, a freestanding Garden Village for example.
- (f) Development deliverability will reflect the outcome of this question
- (g) We question why this council has not taken up the Government's position on building a new Garden Village? This option needs to be seriously considered. A site could be found that will not overwhelm existing larger settlements. A situation close to the trunk road network would be convenient for the commuters who appears to this council's priority.
- (h) Measham. The policy document indicates alternative provision for 420 houses if development is unviable at the Measham Waterside site, due to HS2. The draft statement doesn't make it clear what would happen if Measham Waterside site was able to be partly developed. The policy should

make it clear that the Ashby Road / Leicester Road allocation should only allow enough houses to make up any shortfall from the Waterside site.

Question 13

Do you agree with our suggested approach to the issue of affordable housing? If not what changes do you suggest?

Labour Group Response

- (a) Under current planning direction in NWL – there has been under-provision of so-called ‘affordable homes’. The figures drafted are unacceptable. In the Coalville and Ashby Urban areas the figure should be 40%
- (b) However, the Housing Bill being debated in the HoC, if approved by both Houses, will alter housing provision and the notion of ‘affordable housing’. It is not clear at the time of writing how this issue will pan out to provide a coherent answer. The Labour Group will reserve judgement on the issue.
- (c) There are over 800 persons (and growing) on the Council’s ‘waiting list’. The draft Local Plan rattles on about ‘affordable housing’ but does not reflect needs for those who cannot afford or obtain a mortgage. Nor does it identify land within the draft to build new social housing
- (d) The 2011 Census there were 16,930 people in NWL whose day to day activities are limited by disability. This was an increase of 11% since 2001. Demographic change suggests the figure will increase further over the plan period. The draft Local Plan shows no evidence that it can meet the housing and employment needs of an ever growing ageing population with multiple disabilities. It is disappointing that the issue is not discussed in the document.

Question 14

Do you agree with our suggested approach to the issue of rural exceptions sites for affordable housing? If not what changes do you suggest?

Labour Group Response

- (a) Yes, the Labour Group does agree with the proposed rural exception site policy H5.
- (b) The caveat is that the Labour Group insist that social housing for rent be included in policy H5
- (c) Family and or work ties to the community be the main priority.

Question 15

Do you agree with our suggested approach to the issue of house types and mix? If not what changes do you suggest?

Labour Group Response

- (a) We do not agree

- (b) The 2011 Census there were 16,930 people in NWL whose day to day activities are limited by disability. This was an increase of 11% since 2001. Demographic change suggests the figure will increase further over the plan period. The draft Local Plan shows no evidence that the housing and employment needs of an ever growing ageing population with multiple disabilities. The District needs a significant number of single storey 'bungalows' to be placed in the mix equation.
- (c) No indication for Social Housing needs. There are over 800 persons (and growing) on the Council's 'waiting list'. The draft rattles on about 'affordable housing' but does not reflect needs for those who cannot afford or obtain a mortgage. Nor does it identify land within the draft to build new social housing

Question 16

Do you agree with our suggested approach to the issue of making provision for gypsies and travellers? If not what changes do you suggest?

Labour Group Response

We cannot provide an answer to this question until we have had time to scrutinise reports and recommendations from the December meeting of the Local Plan Advisory Committee.

Question 17

Do you agree with our suggested approach in respect of employment sites with planning permission? If not what changes do you suggest?

Labour Group Response

- (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.
- (b) There should a 'brownfield first' policy
- (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.
- (d) Public Inquiries on applications on Money Hill will reflect the outcome of this question.
- (e) Development deliverability will reflect the outcome of this question
- (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.

Question 18

Do you agree with our proposed employment allocations? If not what change would you suggest?

Labour Group Response

- (a) We do not agree
- (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
- (c) There must be a 'brownfield first' policy
- (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?
- (e) We therefore question the need to allocate any further land for employment use, given the stated residual requirement of +31.74 Ha.
- (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.
- (g) Development deliverability will reflect the outcome of this question
- (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.

Question 19

Do you agree with our suggested approach in respect of existing employment areas? If not what changes do you suggest?

Labour Group Response

- (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.
- (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.

Question 20

Do you agree with our suggested approach in respect of brickworks and pipeworks? If not what changes do you suggest?

Labour Group Response

The Labour Group does agree with proposed policy Ec4

Question 21

Do you agree with our suggested approach in respect of East Midlands Airport? If not what changes do you suggest

Labour Group Response

- (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.
- (b) In principle the Labour Group supports the comments shown in proposed policy Ec5
- (c) But Secretary of State announcements on HS2 and ROXHILL may determine a different approach to airport development.
- (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.
- (e) The Labour Group strongly support a growth bid to extend the Nottingham Tram to EMA.

Question 22

Do you agree with our suggested approach in respect of safeguarding at East Midlands Airport? If not what changes do you suggest?

Labour Group Response

- (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.

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?

Labour Group Response

In principle the Labour Group do not object to the other proposed Public Safety proposals.

Question 24

Do you agree with our suggested approach in respect of Donington Park? If not what changes do you suggest?

Labour Group Response

- (a) In principle the Labour Group will support proposed policy Ec8
- (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.
- (c) The above should be undertaken with NWLDC leadership in conjunction with ROXHILL, EMA and the LLEP

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?

Labour Group Response

- (a) The public remain and will remain sceptical of any 'visions' for our town centres
- (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.
- (c) Castle Donington Councillors want retail expansion in the TC to be included in the Local Plan
- (d) There has been changes in detail of specific sites since publication of documents
- (e) Do we really need retail sequencing?

Question 26

Do you agree with our suggested thresholds? If not what changes do you suggest?

Labour Group Response

- (a) We do not agree
- (b) Where 'The Market' cannot or will not provide then NWLDC needs to be proactive by Compulsory Purchase sites to ensure town centre improvement.
- (c) We feel that there is a lack of identification of rapid evolution of retail within Europe due to internet sales and home delivery.
- (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.

- (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.

Question 27

Do you agree with our suggested approach to Primary Shopping Areas? If not what changes do you suggest?

Labour Group Response

- (a) In principle the Labour Group will support proposed policy Ec11
- (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.

Question 28

Do you agree with our suggested approach to Hot Food Takeaways? If not what changes do you suggest?

Labour Group Response

- (a) In principle the Labour Group will support proposed policy Ec12
- (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'.

Question 29

Do you agree with our suggested approach to Primary and Secondary Frontages? If not what changes do you suggest?

Labour Group Response

In principle the Labour Group will support proposed policy Ec13

Question 30

Do you agree with our suggested approach to Local Centres? If not what changes do you suggest?

Labour Group Response

- (a) The Labour Group recognise that there needs to be an element of Planning pragmatism.
- (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?

Question 31

Do you agree with our suggested approach to Tourism and Cultural development? If not what changes do you suggest?

Labour Group Response

- (a) Assuming the wording of proposed Policy Ec15 reflects the genuine wish of the Conservative Administration then no one should object.
- (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.
- (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.

Question 32

Do you agree with our suggested approach to securing infrastructure as part of new development? If not what changes do you suggest

Labour Group Response

- (a) We feel that the fog, deliberate confusion and uncertainties of the Conservative Administration obscure their lack of desire to provide any 'infrastructure improvements' and doubt these will ever be made. We remain uncertain that Whitehall or the Inspector will require new infrastructure detail before approving the Local Plan?
- (b) The Conservative Administration's political offensive involves telling communities that all we can offer is 'short term pain' for 'long term gains'. There is no timetable for 'long term gain' nor is there any positive sign of how funding will be achieved.
- (c) The Labour Group does agree that infrastructure improvement funding needs to be put in place to break the development log jam. We also recognise that developers are put at a marketing disadvantage when developing land with poor infrastructure. New residents will be put off from purchasing a property on land with poor infrastructure if it means travelling long distance for schools, health or time taken to drive to or from site.
- (d) Current infrastructure funding uncertainties will force developers to seek development sites on land that is more 'deliverable', but unacceptable to nearby communities.
- (e) The Labour Group had hoped that the draft Local Plan had highlighted fixed and agreed financial infrastructure packages to direct development. Not so.

Question 33

Are there any other general items of infrastructure we should be seeking to secure?

Labour Group Response

- (a) It's a pity that the wording of the question is 'seeking' instead of 'demanding'.
- (b) There are many needs that are delivered by other parties and outside the control of a Local Plan. Health, Education, Transport and other public services. The Local Plan can 'ask', but private service providers do not have to deliver. This Council currently holds around £1.3m funding from Section 106 agreements for health – but with no provider willing to spend.
- (c) Transport improvements cannot be delivered due to costly 'ransom strips'. This Council needs a clear public timetabled policy on how & when it can fund infrastructure improvements
- (d) Each community will have its own specific infrastructure improvement needs. Communities should be encouraged to demand local improvements as a result of development.
- (e) Priority for improvement must be the re-instatement of passenger rail links on the National Forest Line and the Trent Junction to Stenson Junction (for Castle Donington).
- (f) Extension of the Nottingham Tram to EMA
- (g) Kegworth Bypass
- (h) A511 Improvements
- (i) A511 Bardon Road (Bardon Road Bypass)
- (j) A new 'north/south' road to take traffic from the Ellistown area to the A511
- (k) Measures to reduce/remove traffic from our Town Centres
- (l) Ashby Town centre requires significant land to be made available additional off street parking spaces. This should take the form of a multi-storey or underground car park in the Town centre rather than using further space suitable for development.
- (m) Ashby Hood Park leisure centre requires an extension to cater for the large number of new houses being built.

Question 34

Is there a lack of any infrastructure in specific parts of the district? If so what are these and what evidence is there to demonstrate this?

Labour Group Response

- (a) It's a pity that the wording of the question is 'seeking' instead of 'demanding'.
- (b) There are many needs that are delivered by other parties and outside the control of a Local Plan. Health, Education, Transport and other public services. The Local Plan can 'ask', but private service

providers do not have to deliver. This Council currently holds around £1.3m funding from Section 106 agreements for health – but with no provider willing to spend.

- (c) Transport improvements cannot be delivered due to costly ‘ransom strips’. This Council needs a clear public timetabled policy on how & when it can fund infrastructure improvements
- (d) Each community will have its own specific infrastructure improvement needs. Communities should be encouraged to demand local improvements as a result of development.
- (e) Priority for improvement must be the re-instatement of passenger rail links on the National Forest Line and the Trent Junction to Stenson Junction (for Castle Donington).
- (f) Extension of the Nottingham Tram to EMA
- (g) Kegworth Bypass
- (h) A511 Improvements
- (i) A511 Bardon Road (Bardon Road Bypass)
- (j) A new ‘north/south’ road to take traffic from the Ellistown area to the A511
- (k) Measures to reduce/remove traffic from our Town Centres
- (l) Ashby Town centre requires significant land to be made available additional off street parking spaces. This should take the form of a multi-storey or underground car park in the Town centre rather than using further space suitable for development.
- (m) Ashby Hood Park leisure centre requires an extension to cater for the large number of new houses being built.

Question 35

Do you agree with our suggested approach to Community Facilities? If not what changes do you suggest?

Labour Group Response

- (a) The Labour Group will support attempts to gain funding for community facilities from developers.
- (b) Recent experience shows that developer funding via Sec 106 makes new development projects unviable. It is of course hoped that the situation will improve. But as it currently stands, the wording of proposed Policy If2 is pointless.

Question 36

Do you agree with our suggested approach to Open Space, Sport and Recreation facilities? If not what changes do you suggest?

Labour Group Response

- (a) The Labour Group considers proposed policy as a minimum

- (b) The Local Plan needs to reflect developer funding for larger communal 'play hubs' and adult exercise equipment in a safe environment away from residential properties.
- (c) Many of our open spaces have been community features for many years and need protection from any development. Bath Grounds in Ashby and Snibston Grange in Coalville need protecting in perpetuity and given special status in the Local Plan.
- (d) Consideration to implement 'village green' status to our valued open spaces.

Question 37

Do you agree with our suggested approach to Transport Infrastructure and new development? If not what changes do you suggest?

Labour Group Response

- (a) This has been discussed in questions 34 & 35 but re-iterate
- (b) Priority for improvement must be the re-instatement of passenger rail links on the National Forest Line and the Trent Junction to Stenson Junction (for Castle Donington).
- (c) Extension of the Nottingham Tram to EMA
- (d) Kegworth Bypass
- (e) A511 Improvements
- (f) A511 Bardon Road (Bardon Road Bypass)
- (g) A new 'north/south' road to take traffic from the Ellistown area to the A511
- (h) Measure to reduce/remove traffic from our Town Centres
- (i) Remove Hugglescote Cross Roads from the draft Local Plan in light of recent deletion of the project by Leicestershire County Council

Question 38

Do you agree with our suggested approach to the Leicester to Burton rail line? If not what changes do you suggest?

Labour Group Response

- (a) Of course yes! We await a report to Leicestershire County Council in the near future.
- (b) Wording in paragraph 8.25 is incorrect. There is a freight rail line via NWL between Trent Junction and Stenson Junction (Castle Donington)

Question 39

Do you agree with our suggested approach to the Ashby Canal? If not what changes do you suggest?

Labour Group Response

Yes!

Question 40

Do you agree with our suggested approach to parking provision as part of new development? If not what changes do you suggest?

Labour Group Response

- (a) No. The current policy is clearly not working.
- (b) NWL has a high dependency on personal transport (mainly cars) due to the lack of effective public transport that can meet shift patterns in employment areas.
- (c) The Council needs to re-examine home parking policy. The exclusion for developers/private rented providers to provide space for car parking tenants in our Town Centres is causing conflict and difficulties. Private off street parking must be available throughout NWL that meets the number of adults residing in properties ie 6 adults = 6 parking spaces per property.

Question 41

Do you agree with our suggested approach to Nature Conservation issues? If not what changes do you suggest?

Labour Group Response

- (a) We welcome policy En1 in principle but have reservations with item 5 (SUDS) and item 6 (supplementary report)
- (b) There is doubt that the long term maintenance of SUDS can be sustainable in the long term unless an accountable public body takes on responsibility
- (c) We welcome a supplementary report but disappointed that it is not available for current consultation.
- (d) We would like development of 'wildlife corridors' to be included in new development

Question 42

Do you agree with our suggested approach to the river Mease Special Area of Conservation? If not what changes do you suggest?

Labour Group Response

- (a) The issue of phosphates in the River Mease (Mease Special Area of Conservation) is an ongoing situation, and as such this policy needs to be continued until a technical solution can be found.

- (b) The Labour Group is critical that it appears little effort has been taken to find the source of abnormal phosphate levels in the watercourse.
- (c) We strongly object to proposed policy En3 (3). We understand a technical solution for phosphate reduction is a long way off. Permitting the use of industrial scale 'septic tanks' on new housing development will provide uncertainties for new residents in the long term. We need to have certainty on which public body will take on adoption & maintenance in perpetuity.

Question 43

Do you agree with our suggested approach to the National Forest? If not what changes do you suggest?

Labour Group Response

- (a) Strong objection to En3 (5) that 'the area between Ashby and Swadlincote be known as the 'Heart of the National Forest.'
- (b) Areas of mining regeneration in the Coalville Area need to be included within the benefits of National Forest Investment. This is another example of the Conservatives devaluing Coalville's heritage and amenities.

Question 44

Do you agree with our suggested approach to the Charnwood Forest? If not what changes do you suggest?

Labour Group Response

- (a) The Labour Group agrees in principle with Policy En4 but:
- (b) It is understood that the so called 'Charnwood Forest Regional Park Steering Group' led by Leicestershire County Council has not met for some considerable time, nor has it any agreed policies.
- (c) The Charnwood Forest within NWL is considered by the public as a diverse wild landscape. Most of the land benefits from the 'Right to Roam' legislation. Tourism initiatives should be supported but large scale housing, employment or industrialised agricultural schemes resisted.

Question 45

Do you agree with our suggested approach to protect the open and undeveloped area between Coalville and Whitwick? If not what changes do you suggest?

Labour Group Response

- (a) The Labour Group agrees in principle with Policy En5
- (b) Policy En5 needs to be expanded to all NWL communities. Communities be encouraged to define 'Areas of Separation' between their settlements.
- (c) The Labour Group demand a policy to deal with 'Coalescence', maintaining separation between settlements on the boundary with another local authority or Parish. Where an area of countryside is

the only separation and reliance on another authority for services is necessary for sustainability, that separation should be maintained in perpetuity

(d) All 'Areas of Separation' be enshrined in perpetuity

Question 46

Do you agree with our suggested approach to Land and Air Quality issues? If not what changes do you suggest?

Labour Group Response

- (a) The issue of air quality and land contamination is an ongoing problem, and as such this policy needs to be continued until a technical solution can be found.
- (b) The Labour Group notes the number of air quality monitoring sites but the Draft Plan appears to have no concern for our High Streets and Town Centres where there is a large number of motor vehicles.
- (c) There is nothing in the draft Local Plan to indicate efforts to REDUCE air pollution.

Question 47

Do you agree with our suggested approach to the Historic Environment? If not what changes do you suggest?

Labour Group Response

- (a) The Labour Group consider proposed policy He1 as a cruel joke and not worth the paper it is written on.
- (b) 'Dual Hatted' Conservative Portfolio Holders saw fit to close the popular Snibston Discovery Museum in Coalville – thus removing £4.2m from the local economy.
- (c) NWLDC has abandoned assisting members of the public and local action groups wishing to obtain 'listed building status'.
- (d) It needs to be proved that stated policies will be met with action from the council.

Question 48

Do you agree with our suggested approach to Renewable Energy issues? If not what changes do you suggest?

Labour Group Response

- (a) The Labour Group notes that there are no questions or policies on mitigating Climate Change measures within NWL (particularly from motor traffic).
- (b) The Labour Group are disappointed at the lack of a policy on 'Fracking' within NWL

- (c) Renewable energy needs to be encouraged within NWL and we should insist on micro renewable generation on new build
- (d) Disappointed that there is no thought or proposals for 'zero carbon' buildings. The Labour Group will want low cost or no cost heat input new build, particularly for low waged residents directed to 'affordable or social housing'.

Question 49

Do you agree with our suggested approach to achieve sustainable Design and construction as part of new development? If not what changes do you suggest?

Labour Group Response

- (a) We understand & disappointed that proposed policy Cc2 will not apply to new social housing
- (b) Within responsibilities and influence NWLDC needs to place stronger measure to mitigate Climate Change. Zero carbon new build must be minimum requirements.

Question 50

Do you agree with our suggested approach to dealing with flood risk as part of new development? If not what changes do you suggest

Labour Group Response

- (a) Climate Change has and will continue to bring about unpredictable changes in weather patterns over the next 20 years. New build being discussed in the draft Local Plan will have a 'shelf life' of (perhaps) 100+ years. The draft local plan does not put into place 'planning principles' that would prevent new build being placed in areas with a high likelihood of flooding.
- (b) The Local Plan must identify responsibility in perpetuity for the long term maintenance of SUDS (and or its successor drainage methods)
- (c) Considerable flooding occurs in urban areas due to ancient and poorly maintained Victorian drainage systems. The Local Plan must take the initiative of not simply identifying land and new build at risk, but ensure that drainage infrastructure is improved throughout to ensure flood risk is reduced elsewhere.
- (d) Flooding also occurs due to poorly maintained road gullies. The Local Plan must ensure that the appropriate highway authorities maintain flood free roads.

Question 51

Do you agree with our suggested approach to Sustainable Urban Drainage Systems? If not what changes do you suggest?

Labour Group Response

- (a) SUDS can and should provide a low cost 'environmentally friendly' method of land drainage.

(b) But SUDS can only be effective in the long term if there is a responsible body to ensure maintenance and repair. The draft Local Plan does not discuss this issue.

Question 52

Do you agree with our suggested approach to Implementation and monitoring, including the monitoring framework? If not what changes do you suggest?

Labour Group Response

- (a) The Labour Group agrees in principle proposed Policy Im1, BUT:
- (b) Implementation and Monitoring can only be carried out by the Council if it provides the political will and human resources availability.

Question 53

Do you agree with our suggested distinction between strategic and local policies? If not, please explain why.

Labour Group Response

- (a) The Labour Group agrees in principle on Neighbourhood Plans
- (b) The Labour Group has always supported communities to prepare Neighbourhood Plans. NWLDC needs to provide more human resources to aid and encourage communities to provide Neighbourhood Plans.