



26 November 2018

Our Ref: OJ/18.135

Planning Policy
Charnwood Borough Council
Council Offices
Southfield Road
Loughborough
LE11 2TN

By email only: localplans@charnwood.co.uk

Dear Sir / Madam

Quorn Neighbourhood Local Plan – Submission Version
A response on behalf of William Davis and Parker Strategic Land

These representations have been prepared on behalf of William Davis and Parker Strategic Land. These companies are working together to bring forward an urban extension to the south of Loughborough on land west of the A4006 Epinal Way, south east of Woodthorpe.

Although these development proposals do not relate to land within Quorn Parish, we have concerns about the delineation of the Local Area of Separation between Woodthorpe and Quorn proposed in the recent consultation document entitled 'Towards a Local Plan for Charnwood', and which have been adopted in Figure 6: Areas of Separation in the Submission Version of the plan.

Representations were submitted to the pre-submission Neighbourhood Plan in September 2018, but the changes sought at that time have not been incorporated into the Submission Version.

Policy ENV1: Areas of Separation seeks to:

Retain the physical and visual separation between Quorn and Loughborough and Woodthorpe. Development within these areas should be located and designed to maintain and where possible enhance the separation of the villages.

The justification for the Area of Separation in the Submission Version of the Neighbourhood Plan is given as follows:

The open countryside between Loughborough/Woodthorpe and Quorn is partly protected as washland (flood zone 3); it is also partly covered by designation (or proposed designation) by Charnwood Borough Council as countryside and as part of the Soar Valley area (green infrastructure). Speculative development proposals should not compromise the open countryside character of the area mapped in Figure 6, or to begin piecemeal coalescence of the presently separate communities. The extension of the Area of

separation to the northwest beyond the railway line is justified because of the extent of developer interest in the development of land on the Loughborough side of the Parish boundary.

It is clear from this extract that there are existing planning policy designations that relate to the undeveloped land between Quorn and Woodthorpe. A further layer of policy is not therefore required. Moreover, the only justification given for this proposed designation extending west of the railway line is the extent of developer interest on the Loughborough side of the Parish Boundary ie outside of Quorn Parish.

The following paragraphs repeat the submissions made to the recent consultation on the Local Plan and the Neighbourhood Plan Pre-Submission consultation, which relate equally to the current Submission Version and consultation exercise.

2004 Green Wedge Designation

The 2004 Local Plan identified an area of Green Wedge between Loughborough and Quorn Policy CT/3 (vi). This designation was derived from criteria in the earlier Structure Plans.

Policy ST/1 of the Local Plan defines the purpose of Green Wedges "*...as areas of open land necessary to preserve the separate identity of settlements...*".

Para 2.31 of the Local Plan states: "*The role of Green Wedges is to ensure that as urban development proceeds areas of open land are retained to prevent the coalescence of settlements and to preserve linkages to the countryside, together with the encouragement of their positive management*".

Green Wedge Designation in the Core Strategy

A review of Green Wedges was undertaken in 2011 to inform the then emerging Core Strategy in the context of more relevant up to date criteria (Charnwood Borough Council Green Wedge Review). This found that the designation in this location was no longer justified.

Accordingly, the 2015 Core Strategy does not designate land between Loughborough and Quorn as a Green Wedge.

Evidence for emerging Charnwood Local Plan

In 2016, the Council commissioned further research in the form of a Study entitled 'Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation'. In respect of Areas of Local Separation this designation is referred to in the following manner:

"An area of open countryside that separates two neighbouring settlements, whose main purpose is preserving settlement identity, and which is based on landscape character and visual appearance of the area" (Section 3.1.2, page 5).

The Study further explains that this designation typically applies to small areas of countryside which prevent coalescence of settlements, maintaining their unique character and identity and their remit is narrower than Green Wedges.

The area between Loughborough and Quorn was considered in this assessment – referred to as PALS -1. The assessment focused on whether the area physically separates settlements and the extent to which



this separation is at risk of being compromised. Relevant extracts are attached to this representation for convenience.

For PALS-1, the Key Findings shown on Page 45 record the contribution as WEAK, setting out the following conclusions:

- provides a less critical gap between Loughborough and Quorn and between Quorn and Woodthorpe due to the area's extensive scale and the lack of intervisibility between settlements;
- the central part of the gap between Quorn and Loughborough/Woodhouse (around the A6/A6004) would be more at risk of compromise;
- the northern and south-western parts of PALS-1, have limited visual and functional connectivity within the surrounding settlements and greater linkage with the wider countryside; and
- although these areas effectively form part of the physical gap between Loughborough and Quorn, they play a lesser role in preventing coalescence between the settlements.

Section 5.1.2 of the Study explains that the Zones of Weakness make a lesser contribution to maintaining the separation between settlements. It goes on to state: "the proposed scale of PALS-1 was narrowed through the assessment process to focus on a particular corridor where the gap between Loughborough and Quorn would be more sensitive to compromise".

These findings are shown pictorially in Appendix 1 of the Study on Drawing 5.1a entitled 'Assessment Findings'. This shows the Zone of Weakness and the Proposed Area of Local Separation. The recommended area for Proposed Area of Separation is shown again on Drawing 5.1a entitled 'Recommended Designation'. The Assessment Proforma on Page 78 of the Study is consistent with this.

In contrast to the conclusions of the above assessment, the Neighbourhood Plan extends the Area of Separation to the north west of the railway line, corresponding to the Area of Weakness. This is unnecessary and not justified by the evidence base document.

Moreover, in establishing the extents of an area of separation, the Study defines criteria that each area needs to meet. The methodology relating to Areas of Local Separation notes, on page 24, that an area of separation should take consideration of 'landscape scale/pattern, topography, development patterns and views'. Section 4.4 goes on to note that "*Identifying durable, clearly identifiable physical boundaries which may be used to clearly define designations is an important consideration for the ability of those designations to perform in the context of a sustainable development strategy.*"

Section 4.4 goes on to identify features that constitute a 'durable' boundary, namely infrastructure such as motorways, public and made roads, rail lines, natural systems such as watercourses, woodland, historic field boundaries and existing development. It states that poorly defined field boundaries are examples lacking durability.

The Great Central Railway provide a more 'durable' boundary for the southern and western extents of the area of separation as defined by the study. Indeed page 78 of the study notes that the current boundary has been aligned with "...a small hedge – lined track towards main street." It is our view that, in context with the A6004 and the Great Central Rail Line this 'small hedge' boundary does not, in comparison, provide a 'durable' boundary.



The A6004 and rail line mark clearly identifiable physical boundaries and will continue to enable the Local Area of Separation to perform its role in the context of a sustainable development strategy.

Basic Conditions

A Neighbourhood Plan must meet basic conditions if it is to proceed to Referendum. The Examination process and the role of the Assessor is to consider whether a Neighbourhood Plan's policies and proposals are consistent with the Basic Conditions. In this regard Basic Conditions A and E are germane to the consideration of this Policy.

Basic Condition A requires a Neighbourhood Plan to have regard to national policies and advice contained in guidance issued by the Secretary of State.

Basic Condition E requires a Neighbourhood Plan to be in general conformity with the strategic policies contained in the development for the area of the authority.

Only where these Basic Conditions can be satisfied is it appropriate for the Neighbourhood Plan to be made.

In this instance, there is no strategic policy in the Core Strategy to justify this designation – the Green Wedge policy which protected open land between Quorn and Loughborough to maintain their separate identities was deleted following the 2011 assessment.

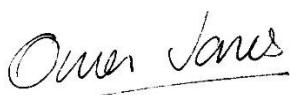
Whilst the emerging Local Plan Issues and Options refers to the potential of an Area of Separation Designation between Quorn and Loughborough, this plan is at an early stage of preparation. Even if the Neighbourhood Plan could base its policies on an emerging Local Plan, the evidence concerning Areas of Separation is relevant to the consideration of the basic conditions against which it is tested (NPPG, Paragraph 009 Reference ID: 41-009-20160211). In this instance, the 2016 Assessment of Areas of Separation is especially material and does not justify this designation being applied to the land west of the Railway Line, which is an area of 'Weakness'.

For this reason, Policy ENV1 as it relates to the area of land between Quorn and Loughborough is not based on or justified by appropriate evidence, as is required by Paragraph: 041 Reference ID: 41-041-20140306 of the NPPG.

For these reasons, we propose that the Area of Separation shown on Figure 6 of the consultation document be amended to exclude the land to the west of the Grand Central Rail Line.

In light of the above, there are, in our opinion, clear grounds for the appointed Examiner to call a public hearing and we respectfully request that this option is exercised.

Yours sincerely,



Owen Jones
Director



cc: John Coleman / Andrew Bamber / Nathan Edwards

