

## **Quorn Neighbourhood Plan 2018 - 2036 Submission Version (October 2018)**

### **Charnwood Borough Council Comments – November 2018**

Charnwood Borough Council is pleased to take this opportunity to comment upon the submission version of the Quorn Neighbourhood Plan 2018 - 2036 (October 2017).

#### **Charnwood Local Plan Conformity**

The Quorn Neighbourhood Plan must be in general conformity with the strategic policies of the development plan if it is to meet the basic condition test. The Charnwood Local Plan 2011-2028 Core Strategy was adopted on the 9<sup>th</sup> November 2015 and alongside the saved policies from the Borough of Charnwood Local Plan (2004); the Leicestershire Minerals Core Strategy (2009); and, the Leicestershire Waste Core Strategy (2009) forms the development plan for Charnwood. However, it is the Core Strategy alone which provides the vision and spatial planning framework for Charnwood along with the strategic policies for delivering growth in the Borough. The Neighbourhood Plan should be in general conformity with this document, as well as the National Planning Policy Framework (NPPF) and Planning Practice Guidance.

The Neighbourhood Plan is considered to be in general conformity with the Core Strategy. The Borough Council does not, however, consider that the proposed boundary of the Area of Local Separation between Quorn and Loughborough is justified. The Council also has concerns that a site which is not allocated and does not have planning permission has been included within the settlement boundary. These concerns are set out in more detail below.

#### **Development Strategy**

The development strategy for Charnwood, identified through Policy CS1: Development Strategy of the Core Strategy, has been recognised by the Quorn Neighbourhood Plan. Quorn is acknowledged as a “Service Centre” with a good range of services and facilities, along with good transport links, allowing the daily needs of the population to be met as well as supporting nearby communities. New development is to be focussed within the existing built-up area; however, greenfield locations may be appropriate where there is a recognised local housing or employment need. Neighbourhood plans are encouraged to provide for this development and also identify further development to support the community, where appropriate.

Core Strategy Policy CS1 seeks to provide at least 3,000 new homes within and adjoining these “Service Centres”. As at 1st April 2018 there were 4,009 completions and commitments for new dwellings in the Service Centres, many more than required to ensure that this minimum target will be achieved.

The establishment of an up-to-date housing target for Quorn to 2036 is recognised as difficult given the relatively early stage in plan preparation of the new Charnwood Local Plan. In April 2018 the Borough Council published a discussion paper, “Towards a Local Plan for Charnwood”, which explored the scale of development needed in the Borough, the key issues and opportunities that need to be taken into account, and, considered the options for an overall strategy for delivering the growth required. Whilst this work has commenced the Borough Council is yet to set an overall housing requirement figure for the Borough to 2036; furthermore, a development strategy for the distribution of housing to 2036 is also yet to be determined. However, Quorn, as a Service Centre, will almost certainly be identified as a location for further housing provision.

The first step in arriving at an appropriate housing requirement for Quorn is to examine the various options which are available in terms of spatial distribution, taking into account Quorn’s position in the settlement hierarchy and arriving at an approach which reflects the vision for Quorn outlined in the Neighbourhood Plan. A paper, “Calculating a housing target for Quorn”, has been produced by consultants YourLocale which provides evidence in this respect.

That paper identifies the minimum and maximum number of new homes likely to be required by 2036 (8,100 to 15,700 dwellings - as published by the Borough in April 2018). The housing requirement for Quorn is then established by taking the requirement as a proportionate share based upon population, giving a requirement of 252 – 488 dwellings. The positive step taken by the Neighbourhood Plan to contribute to meeting the Borough’s housing needs up to 2036 with the allocation of a site and identification of a reserve site to meet the Quorn requirement, following an assessment of options, is acknowledged and supported.

The Plan proposes a settlement boundary for Quorn to update the Borough of Charnwood Local Plan Policy ST/2: Limits to Development. It is noted that the proposed boundary differs to that identified by the Council’s [Settlement Limits to Development Assessment \(2018\)](#) which has been prepared to inform the Local Plan review. It is, however, clear that the methodology used to identify the settlement boundary in the Neighbourhood Plan is closely aligned to the methodology used for the Borough assessment and is therefore considered appropriate. There is however one exception to this which is the inclusion of a site north of the Farley Way which does not benefit from planning permission and is not identified as an allocation in the Core Strategy or Neighbourhood Plan and should therefore be removed as it does not accord with either methodology.

Outside of the settlement, the strategy for the countryside is applied, with a number of more specific policies relating to green infrastructure, landscape and wildlife. This reflects the approach to development in the countryside outlined in Chapter 7 (Our Environment) of the Core Strategy.

As discussed previously, Charnwood Borough Council is currently in the process of producing a new Local Plan for the Borough. To inform the emerging Plan an evidence base is being developed which is relevant when considering the Neighbourhood Plan.

The Local Plan Core Strategy Policy CS11: Landscape and Countryside makes provision for Areas of Separation in the Borough to maintain the character and identity of individual settlements and prevent their coalescence. Quorn Neighbourhood Plan proposes two Areas of Local Separation; between Quorn and Mountsorrel and between Quorn and Loughborough. It has been noted that the Area of Separation suggested between Quorn and Loughborough (Figure 6 of the Quorn Neighbourhood Plan) does not correspond to the recommended designations in the Borough Council’s [Green Wedge, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation](#) review (2016) which was prepared to inform the Local Plan review.

It is acknowledged that the proposed housing allocation, identified following an options assessment process, would have an impact on the Area of Separation; however, this does not justify the wider differences. The Borough wide assessment provides a robust and consistent assessment of all the Areas of Separation in the Borough and therefore the significant differences between the proposed boundaries is of concern due to the lack of similar robust evidence in support of the suggested differences in the Neighbourhood Plan.

### **Assessment of Quorn Neighbourhood Plan Policies**

The table below shows each of the policies contained in the Quorn Neighbourhood Plan and makes a brief assessment in relation to the Charnwood Core Strategy.

Table 1: Policy Assessment

<b>Quorn NP Policy</b>	<b>Relevant Core Strategy Policies</b>	<b>CBC Comment</b>
S1: Settlement Boundary	CS1: Development Strategy CS11: Landscape and Countryside	Inclusion of a site which does not meet the criteria set out in the Settlement Boundary Methodology.
S2: Design Guidance	CS2: High Quality Design	Policy in general conformity
H1: Residential Site Allocation	CS1: Development Strategy CS2: High Quality Design CS3: Strategic Housing Needs	Policy in general conformity

	CS13: Biodiversity and Geodiversity CS15: Open Spaces, Sports and Recreation CS16: Sustainable Construction and Energy	
H2: Reserve Site	CS1: Development Strategy CS2: High Quality Design CS3: Strategic Housing Needs CS14: Heritage CS15: Open Spaces, Sports and Recreation CS16: Sustainable Construction and Energy	Policy in general conformity
H3: Housing Mix	CS3: Strategic Housing Need	Policy in general conformity
H4: Affordable Housing Provision	CS3: Strategic Housing Need	Policy in general conformity
H5: Windfall Development	CS1: Development Strategy CS2: High Quality Design	Policy in general conformity
ENV1: Areas of Separation	CS11: Landscape and Countryside	Significant discrepancy with evidence base supporting emerging Local Plan which is not sufficiently evidenced.
ENV2: Local Green Space	CS11: Landscape and Countryside CS12: Green Infrastructure CS13: Biodiversity and Geodiversity CS14: Heritage CS15: Open Spaces, Sports and Recreation	Policy in general conformity
ENV3: Sites of Natural Environmental Significance	CS13: Biodiversity and Geodiversity CS12: Green Infrastructure	Policy in general conformity
ENV4: Trees, Woodland and Hedges	CS13: Biodiversity and Geodiversity	Policy in general conformity
ENV5: Sites of Historic Environment Significance	CS14: Heritage	Policy in general conformity
ENV6: Biodiversity	CS13: Biodiversity and Geodiversity	Policy in general conformity
ENV7: Wildlife Corridors and Habitat Connectivity	CS13: Biodiversity and Geodiversity CS12: Green Infrastructure	Policy in general conformity

ENV8: Protection of Important Views	CS11: Landscape and Countryside CS14: Heritage	Policy in general conformity
ENV9: Renewable Energy Generation Infrastructure	CS16: Sustainable Construction and Energy	Policy in general conformity
CF1: Retention of Community Facilities and Amenities	CS1: Development Strategy	Policy in general conformity
CF2: New or Improved Community Facilities	CS1: Development Strategy CS2: High Quality Design CS24: Delivering Infrastructure	Policy in general conformity
CF3: Schools	CS1: Development Strategy CS2: High Quality Design	Policy in general conformity
CF4: Quorn Medical Centre	CS1: Development Strategy CS2: High Quality Design	Policy in general conformity
E1: Employment and Business Development	CS2: High Quality Design CS6: Employment and Economic Development CS10: Rural Economic Development	Policy in general conformity
E2: Quorn Village Centre	CS2: High Quality Design CS9: Town Centres and Shops	Policy in general conformity
E3: Home Working	CS2: High Quality Design CS6: Employment and Economic Development	Policy in general conformity
E4: Farm Diversification	CS2: High Quality Design CS10: Rural Economic Development CS11: Landscape and Countryside	Policy in general conformity
E5: Tourism	CS10: Rural Economic Development CS12: Green Infrastructure CS14: Heritage	Policy in general conformity
E6: Broadband Infrastructure	CS10: Rural Economic Development	Policy in general conformity
T1: Traffic Management	CS2: High Quality Design CS17: Sustainable Travel CS18: Local and Strategic Road Network	Policy in general conformity
T2: Public Car Parking	CS18: Local and Strategic Road Network	Policy in general conformity
T3: Footpaths	CS2: High Quality Design CS17: Sustainable Travel	Policy in general conformity

## Conclusion

The Borough Council welcomes the constructive working relationship which the Neighbourhood Plan Advisory Committee offered during the production of the Quorn Neighbourhood Plan and the contribution which this made to ensuring that the Plan

was developed in general conformity with the adopted Charnwood Local Plan 2011 to 2028 Core Strategy. The Borough Council does however raise concerns in relation to the justification of the Area of Separation boundary between Quorn and Loughborough and the inclusion of an unallocated site within the Settlement Boundary.