



QNP Form 3 - Regulation 16 - Submission consultation representations and response summary

No.	Respondent	Comment	QPC Response
1	Environment Agency	<p>LT/2008/106761/OR-28/PO1-L01 06 November 2018 Mr Platts</p> <p>Thank you for your letter of 15th October 2018 consulting us with the Submission version of the Quorn Neighbourhood Plan. According to our records this is the first consultation that we have received in respect of this Plan document.</p> <p>It is unfortunate that at this late stage in the Plan process that the Environment Agency is objecting to the soundness of the Plan.</p> <p>Our objection is in respect of the proposed housing allocation site. On page 21 of the Plan under Section 4, subsection 4.1 overview, it states that 21 new dwellings are required in Quorn up to 2036. In order to meet this requirement two sites have been identified, the proposed allocation site and a reserve site. The proposed allocation site will provide a minimum of 75 dwellings and the reserve site up to 45 dwellings. The problem that we have with the choice of the sites is that the proposed allocation site is in an area which encompasses areas of Flood Zone 2, Flood Zone 3a & Flood Zone</p>	<p>Quorn Parish Council</p> <p>It is unfortunate, and we are of course concerned that the Environmental Agency (EA) did not receive our notifications. According to the QNP Stakeholders List on our website the EA were notified twice. On 20 June 2017 and they responded on 23 June when Mr Platts signed the response letter and the EA were notified again on 17 July 2018. This request received no response even though other Statutory Bodies notified at the same time did respond.</p> <p>The proposed allocation site within the overall land area specifically excludes the area associated with flooding. The reserve site is not currently developable because it has no access, therefore cannot be an allocation that is sufficiently robust for inclusion in the NP. It is a reserve site, for which the numbers are not an essential requirement, to come forward at some unspecified time in the future if access can be resolved.</p>





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		<p>3b, whilst the reserve site is wholly within Flood Zone 1 the area of lowest Flood Risk.</p> <p>The responsibility for siting houses in the areas at least flood risk through applying the Sequential Test rests with the Local Planning Authority. I am pointing out that there is no evidence within the Plan documentation that the sites have been subjected to the Flood Risk Sequential Test in accordance with NPPF. The proposed allocation site could not pass the sequential test as there is the reserve site which is at lower flood risk than the proposed site. The proposed allocation site is contrary to the Paragraphs 155, 156, 157 and in particular Paragraph 158 of the NPPF. It is also contrary to Strategic Objective 10 and Policy CS 16 of the Charnwood Local Plan 2011 to 2028 Core Strategy.</p>	<p>Miller Homes</p> <p>The Miller Homes plan summarising the works has been made available and has watercourse consent to enable the development. A flood risk assessment for the works is available. The Flood Modelling Executive Summary is attached.</p> <p>JPP Consulting Ltd.</p> <p>We have been appointed by Miller Homes to undertake the engineering design for a site off Loughborough Road, Quorn. In terms of flood risk the site is protected from the River Soar by flood defence's offering at least a 1 in 100-year standard of protection to the site. When the Poultney Brook (to the South) overtops its banks, flood water converges toward the site via the culvert crossing under Loughborough Road and flows through a 450mm diameter culvert on site flowing South to North, until its capacity is exceeded. Exceedance flows then spread across the site, following the lowest topography</p> <p>As shown in our drawing 9519/H/101 (attached), to improve the ecological status of the site and alleviate flood risk (both to the site and to properties downstream), the decision has been taken to remove the culvert crossing site and reinstate with an open channel. This will be coupled with a new earth flood bund with a crest level set 600mm above the 100-year with (+50%) climate change flood level running from the left side of the channel outlet up to the A6 Road embankment and an approximately 35m long flood bund running with the same characteristics running from the right side of the channel outlet in an easterly direction. Finally, a flood compensation area that provides additional storage capacity within the River Soar floodplain will be provided. A full hydraulic</p>
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		<p>Section 5 Environment, subsection 5.1.1 (page 27), refers to NPPF (2012), this document has been updated and the current version of NPPF is July 2018. The submission Plan should be updated.</p> <p>Page 34, 2nd line of paragraph, suggesting that the term washland is replaced with the more common term for areas that are prone to flooding “floodplain”.</p> <p>Within the Statement of Basic Conditions which is dated September 2018, the NPPF Paragraphs that are referred to in Table 1 relate to the previous version of the NPPF dated March 2012. If the Basic Conditions Statement is dated September 2018 then the NPPF paragraphs quoted should be from the 2018 NPPF document.</p>	<p>model has been prepared and reviewed by the Environment Agency & Lead Local Flood Authority (LLFA) to accurately size and locate the works described above.</p> <p>The works have received consent under Section 23 Land Drainage Act 1991 from Leicestershire County Council Lead Local Flood Authority.</p> <p>As a result of the above the site and all proposed dwellings will be within flood zone 1 (low risk)</p> <p>Quorn Parish Council Paragraph 214 in the new NPPF specifically states that Plans submitted before January 2019 should be measured against the 2012 NPPF, as the NP does, and not the 2018 NPPF.</p> <p>Noted</p> <p>Paragraph 214 in the new NPPF specifically states that Plans submitted before January 2019 should be measured against the 2012 NPPF, as the NP does, and not the 2018 NPPF.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div style="text-align: center;">  9519H - 101(D) - Sections Through W </div> <div style="text-align: center;">  Flood Alleviation Executive Summary (</div> </div>
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