

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

My Ref: SWI-001-C/QuornNP/CL/JJ/001

Your Ref:

Date: 26<sup>th</sup> November 2018

Sent by email to localplans@charnwood.gov.uk

Dear Sir/Madam,

### **QUORN NEIGHBOURHOOD PLAN 2018-2036 SUBMISSION VERSION – REPRESENTATIONS ON BEHALF OF SWITHLAND HOMES**

#### **Introduction**

Heaton Planning Limited (referred to hereon as 'HPL') have been instructed by Swithland Homes to submit representations to this submission stage consultation of the Quorn Neighbourhood Plan. This letter emphasises, re-iterates and builds upon points previously submitted by HPL on behalf of Swithland Homes at the pre-submission stage consultation.

Once formally made, the Neighbourhood Plan will form part of the Development Plan for Quorn and set out where and how new development should take place within and around the village to 2036. Swithland Homes therefore wish to take this further opportunity to participate in the preparation of this Neighbourhood Plan and continue to promote land off Armston Road, Quorn, for residential development. As submitted previously, a plan confirming the full extent of the available landholding is enclosed as **Appendix 1**. A full copy of representations submitted by HPL on behalf of Swithland Homes at the pre-submission stage consultation are also appended at **Appendix 2**.

#### **Our Client - Swithland Homes**

Swithland Homes (herein referred to as the Company) are a privately-owned house builder specialising in offering high-quality residential developments. The Company was established in 2014 and its Directors are also residents of Quorn and recognise the qualities of the area.

The Company are highly experienced in the development industry and, within the plan period, will be able to contribute greatly to the delivery of residential development across Charnwood through a steady supply of new dwellings.

9 The Square, Keyworth, Nottingham, NG12 5JT  
Tel 0115 937 5552 email [chris@heatonplanning.co.uk](mailto:chris@heatonplanning.co.uk)

## Housing Requirement

Firstly, Swithland Homes do not consider the approach to defining a housing requirement within the Neighbourhood Plan sufficiently reflects the role of Quorn as a “Service Centre” within the Development Plan.

The figure contained within the Neighbourhood Plan appears to be based upon a simplistic division of population. This should only ever be the starting point for calculating a figure. It does not reflect national policy (paragraph 66 of the NPPF) which confirms that evidence such as the spatial strategy (either adopted or emerging) and role of Quorn in providing a range of services and facilities should be considered. The methodology as presented is not robust and represents a policy of artificial constraint rather than providing positive, practical solution.

As noted above this Neighbourhood Plan should be in general conformity with the adopted Development Plan for the area. Clearly this means that it should as a starting point reflect the adopted, published position. It is also appropriate to consider how housing requirements may change, given the wider climate of under delivery that exists within Charnwood, as this may also have implications.

CS policy CS1 seeks to provide for at least 13,940 new homes between 2011 and 2028. It identifies the Leicester Principal Urban Area as the priority location for growth and states that the majority of the remaining growth will be met at Loughborough and Shepshed, where provision for at least 5,000 new homes will be made during the above-noted period. The policy also seeks to plan positively for the role of seven Service Centres, including Quorn. Provision will be made (amongst other matters) for at least 3,000 new homes within and adjoining the Service Centres.

Various evidence prepared by the Borough Council indicates an apparent healthy supply of housing land is already consented in and around the Borough’s service centres. However, it is acknowledged within the *Towards a Local Plan for Charnwood* publication at paragraph 3.6 that not all of the sites contributing to the supply of new residential development in the adopted Core Strategy (and those with planning permission) will be built by 2036.

In recent years, Charnwood Borough Council has not been able to demonstrate an adequate supply of housing land. Primarily this has related to the failure of large strategic sites to deliver housing. The Borough Council’s published Housing Delivery Study (2018) emphasises the risks associated with a small number of scheme promoters controlling multiple strategic sites. It is noted at paragraph 12.4 that a small number of promoters with interests in a significant proportion of the units to be delivered across the Borough “may reduce incentives to deliver at pace, especially in times of lower demand when prices are stagnant or falling.”

This acknowledgment is in addition to the estimates of additional need for homes (HPL emphasis underlined) contained within the Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA). This additional need has been discounted by the Neighbourhood Plan.

The Charnwood Housing Delivery Study (2017) acts as the evidence of housing delivery on which the *Towards a Local Plan for Charnwood* publication is based. The Study states at paragraph 1.7 that housing delivery rates will be “*insufficient to address the undersupply from previous years, and meet new housing need annually, and without proactive intervention there will remain an undersupply of housing probably into the mid to late 2020s*”.

In our opinion, that “proactive intervention” is likely to require a redistribution of housing requirement to locations which are acknowledged to be sustainable and where there is true appetite to deliver homes. The methodology used in the calculation of housing figures for Quorn is considered to be simplistic and flawed, and should not be found sound.

It would be somewhat naïve to suggest that this is solely an issue that should be tackled by the Borough Council and in our opinion, the neighbourhood plan requirement for Quorn should identify additional land in sustainable locations, ideally within areas which are well related to the centre of the village.

In response to previous representations made by HPL on behalf of Swithland Homes relating to the housing target within the Neighbourhood Plan, the Representations and Responses Summary states that “it is the responsibility of the Local planning Authority to provide a housing target.” Given that the Borough Council have not been able to demonstrate an adequate supply of housing land in recent years and that the problem is largely down to implementing the high-risk strategy of tying up supply of housing in large strategic sites, we consider that not only do the housing figures for Quorn need to better reflect the role that the Neighbourhood Area can have in delivering much-needed housing, but also the important contribution to housing delivery of smaller sites. We submit that the Neighbourhood Plan should perform an active role in addressing the need for housing within the Neighbourhood Area.

### **Contribution of Non-Strategic Sites**

The Swithland Homes promoted site at Armston Road is not of strategic scale but does provide an opportunity to make a valuable contribution to meeting local scale housing need. The importance of the contribution of small sites delivered by developers like Swithland Homes cannot be discounted, as has been emphasised by recent national policy publications such as the Government Housing White Paper titled ‘Fixing Our Broken Housing Market’.

The White Paper has confirmed the Government acknowledges the role of small housebuilders such as Swithland Homes and subsequently amended national planning policy seeks to ensure that the planning system delivers sufficient opportunities for small housebuilders to contribute to a broadening of the housing market and prosper.

Paragraph 1.29 of the white paper states that “*Policies in plans should allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector. Small sites create particular opportunities for custom builders and smaller developers. They*

*can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive”.*

The revised NPPF also emphasises that Neighbourhood Planning Groups should consider the opportunities for allocating small sites for housing in their area, it is also clear that the Government expects this to deliver at least 10% of the identified housing requirement unless there are “strong reasons” why it cannot be achieved.

It is considered that in preparing this Neighbourhood Plan, the role of small sites and developers such as Swithland Homes has not been appropriately recognised within the policies and associated land allocations. Whilst the Parish Council acknowledge a contribution to housing supply from windfall sites (5 dwellings per annum), there is no guarantee that this will continue, particularly given the constraints to development that exist within Quorn (e.g flood risk). Reliance on windfall development to meet the needs of smaller developers over the Neighbourhood Plan period is not considered to be a sound methodology for delivering a mix of housing sites.

Therefore, it is more appropriate to identify a range of deliverable sites within and adjoining the Village to increase choice and competition. This in our view is a more appropriate method by which proper support can be given to the delivery of housing.

#### **Promotion of Land off Armston Road**

The modest development promoted to the Quorn Neighbourhood Plan by HPL on behalf of Swithland Homes is modest and of a suitable scale (around 10 new dwellings, plus other complementary development) to reflect local character and technical constraints. Swithland Homes consider their land interest should be positively identified and delivered through an allocation within the Neighbourhood Plan.

The promoted site at Armston Road, Quorn is wholly owned by a Director of Swithland Homes. It is available for development and HPL submit is deliverable.

A masterplan has been prepared which reflects a range of opportunities and constraints which have been identified by a team of professional consultants. This includes consulting engineers (Rodgers Leask) who have considered the ability to provide a safe and suitable access from Armston Road. Specialist environmental planning and design consultants EDP have also been engaged to provide expert advice on urban design, ecology, heritage, landscape impact and arboriculture (trees). Their collective technical advice is reflected in the illustrative masterplan which confirms a modest residential development can be delivered within the landholding.

The site, land off Armston Road, Quorn, is referred to as “Quorn 8 – Armston Road” in the Site Selection Framework which lists the residential sites promoted to the emerging Neighbourhood Plan. Furthermore, the was promoted to Charnwood Borough Council in June 2018 alongside a small number of other sites promoted for residential development across

the wider Borough. The site has been promoted as part of the Borough Council's Strategic Housing Land Availability Assessment (SHLAA) under reference PSH309.

A masterplan has been prepared which reflects a range of opportunities and constraints which have been identified by a team of professional consultants. Copies of the illustrative masterplan and opportunities & constraints plan have been provided as **Appendices 3 and 4**. The site masterplan and technical reports prepared were submitted as appendices at the pre-submission stage, but have not been acknowledged in the published Representations and Responses Summary.

The Representations and Responses Summary does respond to a master plan prepared in support of land promoted by Pegasus/Miller Homes to the Neighbourhood Plan. The masterplan prepared by Pegasus/Miller Homes indicates that their site would deliver approximately 75 dwellings at 30 dwellings per hectare, taking into account noise and flood risk constraints on site. The Representations and Responses Summary states that this "is the subject of ongoing discussions". No such discussions have taken place with HPL or Swithland Homes despite preparation and submission of a masterplan and technical reports for the Armston Road site. In contrast to the submission version Neighbourhood Plan's response to Pegasus/Miller Homes, no acknowledgement of the masterplan for Armston Road or the technical reports prepared for Armston Road has been received.

Table 2 of the published Site Selection Framework shows the re-scored sites promoted to the Quorn Neighbourhood Plan for residential development. We have been able to compare the Site Selection scoring framework published at pre-submission stage and that published following the pre-submission consultation for the Armston Road site only.

It is noted that at Table 1 of the Site Selection Framework, the methodology for site selection criteria has changed. The overall 'score' attributed to the Armston Road site has also changed. The Armston Road site is placed fourth out of the ten sites promoted in the Plan, behind the following sites:

- Farley Way East (First, but about to receive a planning consent);
- Land between A6 and Loughborough Road (Second); and
- Buddon Lane (Third).

As Strategic Sustainability Assessment proformas for all other sites were withheld from public scrutiny at the pre-submission stage, it was not possible to comment on whether the scoring attributed to promoted sites was consistent at that stage. Site promoters have been denied the right to compare scoring for their sites against competing sites until the publication of the Site Selection Framework prior to this submission version consultation. It also appears that none of this information was made available at the Parish Council meeting held on 16 July 2018 when the pre-submission document was approved for consultation. Representatives of HPL and Swithland Homes attended this meeting.

In our opinion the failure to make this information available at earlier stages of the plan's preparation placed interested parties at a distinct disadvantage, prejudicing their ability to play an informed, full and active role in the Plan's preparation.

HPL have repeatedly requested the publication of all of the information submitted to the Neighbourhood Plan group regarding sites promoted for residential development. In particular, no site plans have been published that would enable interested parties to comment on the scale of any promoted sites. Site Plans for all sites, not to mention masterplans and other technical reports prepared, have been withheld from public scrutiny. Full open and transparent public consultation on the submission version Neighbourhood Plan therefore cannot be undertaken as key information has not been made available.

HPL have been told by the Neighbourhood Plan Advisory Committee that key information such as site plans are confidential and are not available for public consideration. This is at odds with the purpose engaging through statutory public consultation and is contrary to paragraph 16 of the NPPF (2018).

The information published to support this submission version consultation is incomplete and does not allow for a full public and democratic process. We have been issued with information regarding our promoted site, Armston Road, but we are unable to compare if/how other sites have been re-scored.

As an example of our inability to comment on key issues relating to the deliverability of the sites favoured in the Neighbourhood Plan process, Buddon Lane is placed third at present in the Site Selection Framework and is therefore 'preferred' to Armston Road which is placed fourth. Buddon Lane is shown within the submission version Neighbourhood Plan at Figure 3 (b) to be the only Reserve Site for housing in the Neighbourhood Area. This is supported by Policy H2: 'Reserve Site'. Figure 3 (b) shows that the Buddon Lane site does not have any possible direct access from to/from the public highway.

As a site with no access to the highway, the deliverability of the site has been queried by HPL in conversations with the Neighbourhood Plan Advisory Committee. The Site Selection Framework published states that "a major question of access in terms of ownership of Buddon Lane, third party involvement might well make the site undevelopable. The site is disconnected from the current traffic movement system." Furthermore, Appendix F(b) of the submission version Neighbourhood Plan states at paragraph 5.2 that the Buddon Lane site is currently undeliverable.

We have been told through discussions with the Neighbourhood Plan Advisory Committee that access to the Buddon Lane site is achievable, but that this information is sensitive and confidential. We disagree and consider that as access is a key element relating to the deliverability of any site, it should be demonstrable that access is possible at this stage. The deliverability of the Buddon Lane site for housing over the Neighbourhood Plan period is highly questionable and the methodology used to conclude that the Buddon Lane site is a

preferred site for housing has been secretive and requires full scrutiny, as discussed further below.

As aforementioned, the Buddon Lane site scores 'Amber' as a RAG rating for its 'safe vehicular access' criteria in the Site Selection Framework', despite not showcasing any available access. The Armston Road site promoted on behalf of Swithland Homes scores 'Red' as a RAG rating, despite the submission of a Technical Note for Site Access Feasibility prepared by Rogers Leask Ltd which was sent to the Parish Council as part of our comprehensive response to the pre-submission version consultation. The Technical Note concluded that a design standards compliant access to/from the site could be achieved at Armston Road. The Armston Road site already benefits from an access from Armston Road public highway. This is just one example of inconsistencies in the scoring of sites promoted to the Neighbourhood Plan.

We consider that the land off Armston Road site has been inaccurately scored against many of the criteria listed in the SSA at pre-submission version and the Site Selection Framework published prior to this submission version consultation. A plethora of points were made in response to the pre-submission version Neighbourhood Plan consultation, some of which have been addressed in update selection framework. However, many of the issues we raised have not been adequately addressed or acknowledged in the Representations and Responses Summary or any other private correspondence or publication.

In response to our previous representations, the Representations and Responses Summary document states that with regard to our highlighting the inaccuracies and inconsistencies in the methodology employed: "There are elements of subjectivity within all assessments however, and we will review the SSA in light of these comments received. Following review, the SSA analysis will be amended accordingly if felt appropriate to do so."

We consider that the issues we have previously raised at the pre-submission consultation have not been considered with a satisfactory degree of scrutiny. Consideration of matters raised relating to individual criterion appear to be absent.

The matter of vehicular access discussed above aside, remaining notable inconsistencies include the following:

Site Area and Capacity: The land off Armston Road site has been scored 'Amber' due to its site area and capacity. Paragraph 69 of the NPPF specifically identifies that small and medium-sized sites should be considered for housing allocation by Neighbourhood Plan groups. The assessment criteria at Appendix F(a), Table 1, outlines that small sites score higher than sites of greater than 50 dwellings, and that sites of fewer than 16 units score higher than sites with a capacity of 16-49 units. We do not consider that a potential housing site covering a large area acts as a constraint to development; the prioritisation of sites with a capacity of under 16 dwellings is not supported in national or local guidance. Based on this, we consider the methodology used to be unsound.

The categorisation of the Armston Road site as 'Amber' when the site's capacity does not act as a constraint to the delivery of an appropriate number of dwellings is not justified.

Current Use: The site has been scored 'Red' as it is described as 'a large copse of trees some of which will need to be removed to allow development'. There are several Tree Preservation Orders present across the site, but mainly located in the northern area of the site adjacent to Whall Close. An assessment of Arboricultural Constraints has been undertaken for the site which has identified that there are no unsurmountable arboricultural constraints upon the site that would require the 'significant mitigation' associated with a 'Red' RAG score. A masterplan of the site has also been produced which has considered potential for impact on arboricultural features. Whilst the entire 1.1 hectare site may not be developable, it can accommodate an appropriate and comfortable density of housing development. In order to attribute a 'Red' RAG rating, 'the loss of an important local asset' is required. No such loss is proposed at Armston Road and therefore the site has been underscored due to flawed application of the methodology.

Adjoining Uses: In order to gain a 'Green' RAG rating, the methodology used states that the site should be "wholly within residential area or village envelope". The location of the site in terms of the village envelope/settlement boundary is discussed later in this letter.

Topography: The land is accurately described as 'gently undulating' which seems to fall between the wording used in the methodology to describe a 'Green' (gently sloping) and an 'Amber' (undulating) site. It is unclear as to why the Armston Road site is rated 'Amber' when the topography poses no constraint to development.

Good Quality Agricultural Land?: This criterion is not considered to be applicable to the land off Armston Road site due to the site's size which renders it incompatible with crop growing. The primary use of the land off Armston Road site is for the grazing of horses. In planning terms, the site is not in agricultural use, but is in equestrian use. Horses grazing the site are present in order to maintain the site and are not kept for any other use. Therefore, the loss of land that is stated within the Site Selection Framework to be within agricultural land classification grade 3 is not a relevant constraint to development that can be considered as no agricultural land is proposed to be lost. Consequently, the site can be rated as 'Green'.

Landscape and Visual Impact: A Summary Note in Respect of Landscape has provided greater detail of the promoted site's potential for landscape and visual impact than anything published supplementary to the pre-submission or submission versions of the Neighbourhood Plan. We consider that the rating of the site as 'Red' for Landscape and Visual Impact is not appropriate as there are no major landscape and visual constraints to development. The Summary Note concludes that "the only landscape-related designations and policies that would constrain development of the site are TPOs and the location of the northern part of the site within the conservation area" and "an acceptable scheme could be designed that respects and enhances the local landscape." No 'substantial harm to quality' is proposed.

Important Trees, Woodlands & Hedgerows: As with the 'Current Use' criteria, the arboricultural assessment work undertaken and the masterplan of the site show that the promoted site can deliver an appropriate number of dwellings for the site without major arboricultural constraints. Consequently, given the potential to develop a scheme incorporating existing trees, woodland and hedgerow where possible, as demonstrated by the masterplan, this criterion is not considered to be a major constraint to development and the site should be rated 'Green'.

Relationship with existing pattern of built development: As the accompanying example masterplan shows, the amenity of existing neighbouring residences to the east of the site at Paddock Close are to be respected through appropriate boundary treatments and retained arboricultural features where they exist. Low-density residential development at the promoted site is not out of character with the surrounding built development which also comprises low-density residential development. The site should not be scored as 'Red', which represents 'prominent visibility / difficult to improve' which is not the case, as demonstrated by the masterplan prepared.

Local Wildlife Considerations: The developable area of the site consists predominantly of private amenity grassland and poor semi-improved grassland, as shown within the accompanying Ecology Summary Note. Many of the species listed in the SSA as 'observed' and therefore presumably contributing to the site's existing 'Red' RAG Rating are not protected species. The Ecology Summary Note prepared does not consider there to be any significant constraint to residential development of the site. The possible presence of protected species can be determined through survey work at the appropriate time of year. However, the Ecology Summary Note outlines that even if protected species were found to be present, the populations could be readily safeguarded through sensitive scheme design and appropriate mitigation measures, and would not present an 'in principle' constraint to development. Opportunities for protected species could potentially be significantly enhanced in any future development proposal, which would be assessed on its ecological merits at the planning application stage. Overall the site is not majorly constrained by local wildlife considerations and should therefore not still be rated as 'Red'.

Listed Building or important built assets?: The Archaeology and Heritage Summary Note prepared assesses the potential for residential development at the site to impact upon the designated heritage assets in the vicinity of the site, namely Quorn House and the Quorn Conservation Area. The site is rated 'Green' for impact on the Conservation Area within the SSA but 'Red' for undermining the integrity of the setting of Quorn House. This is rebuked in the Archaeology and Heritage Summary Note. In brief, it is considered that the site was never designed to be seen from Quorn House nor was the house designed to be seen from the site. The site overall forms a small part of the house's overall significance and it is considered that sensitive residential development of the site can be progressed without causing a large degree of harm to the house. As the proposed development does not result in 'substantial harm' or harm which cannot be mitigated to acceptable levels (paragraph 196 of NPPF) the site should not be rated as 'Red'.

Impact on existing vehicular traffic?: The Technical Note for Site Access Feasibility has assessed the vehicle trip generation likely to be incurred by the residential development of the site using the Trip Rate Information Computer System TRICS. The Technical Note overall considers that the promoted site is unlikely to result in a volume of vehicle movements that the Local Highway Authority would deem 'severe' and unacceptable in line with the NPPF. We do not consider that the methodology used is appropriate in this instance as in highways terms, a site is either appropriate for not appropriate. The Technical Note provided outlines that residential development of c. 30 units at Armston Road is likely to be acceptable and therefore there is no constraint to development.

Distance to Primary school: Manual for Streets states that, while desirable, 800m is not an upper walking limit and that walking offers the greatest potential to replace short car trips, particularly those under 2km. Both the primary school and secondary school are well within the 2km walking distance threshold. It is also important that the walking or cycling route to facilities should be taken into account. The walking route from this site to local services and facilities including primary and secondary education is generally good (level, paved, lit, flat and safe) and fairly direct. We consider that the methodology used is rudimentary and to simply use distance to/from services without consideration of factors such as topography/surfacing/pedestrian safety is too simplistic and the site has consequently been under-scored.

Any contamination issues?: The site has a RAG rating of 'Amber' for contamination which indicates that the presence of 'small fly tips'. We are not aware of any fly tips at the Armston Road site and if any small tips were present, no mitigation for contamination will be required beyond simple removal of any tips. The issue is not considered to be a major constraint and as such the site should be rated as 'Green' for contamination issues.

### *Overall*

Based on the comments above, we consider that the land off Armston Road site has been under-scored within the initial SSA and updated Site Selection Framework. We made the Neighbourhood Plan group aware of our recommended revised scoring for Armston Road at pre-submission stage. We also made the masterplan for the site and all of the Technical work undertaken by appointed specialists available at pre-submission stage.

We previously suggested that a more accurate summary of RAG scores based on the modifications proposed above would give the site an overall sustainability summary of:

- Red – 0
- Amber – 3
- Green – 25

**(Giving an overall score of +25)**

The updated proforma was submitted to initiate further discussion regarding the potential identification of the Armston Road site as an allocation within the Neighbourhood Plan. Unfortunately, we have not seen any evidence that our recommendations for the re-scoring of each criterion have been considered.

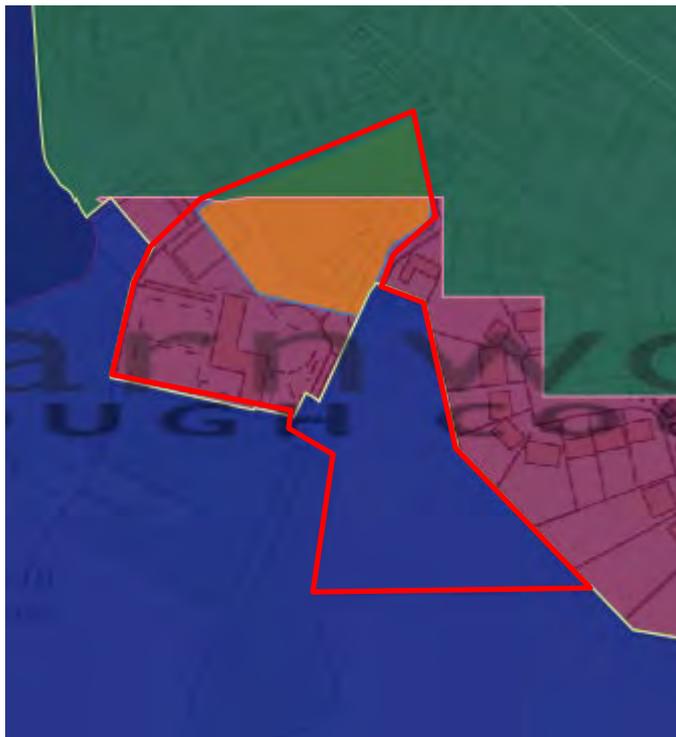
## **General Policies**

### *Settlement Boundary (Methodology and Approach)*

It is noted that the Parish Council have chosen to adopt a new settlement boundary that is not reflective of the adopted Development Plan for the area.

The Development Plan is comprised of the Charnwood Local Plan 2011 to 2028 Core Strategy (adopted 2015) (CS) and saved policies within the Charnwood Local Plan 1991-2006 (adopted 2004) (LP). The CS was prepared and examined in the context of the National Planning Policy Framework (2012).

We provide an extract of the adopted Development Plan Proposals Map below. This shows that part of our client's landholding (the purple, orange and green shading) is located within the Settlement Boundary of Quorn.



*Figure 1 – Extract of Local Plan Proposals Map with approximate site boundary shown*

The proposed settlement boundary contained within the draft Neighbourhood Plan excludes the existing built development within our client's landholding. However, it follows a proposed draft settlement boundary contained within a recent early consultation upon the emerging Local Plan for Charnwood.

This emerging plan is at a very early stage of preparation, its proposed settlement boundary is also subject to unresolved objections, including those from Swithland Homes. As such, the draft settlement boundary (which has been simply reproduced from the Local Plan consultation) cannot be given material weight.

This Neighbourhood Plan should be in general conformity with the adopted Development Plan for the area. Clearly this means that it should as a starting point reflect the adopted, published position. In the published Representations and Responses Summary published following the pre-submission consultation, it is noted that “the identification and drawing of settlement boundaries are matters of detail that are within the remit of NPs”. We consider that in this instance very limited weight should be given to the Neighbourhood Plan’s use of the settlement boundary contained within the emerging Charnwood Borough publication *Towards a Local Plan for Charnwood*.

In a planning appeal at Rearsby (Appeal ref. APP/X2410/W/17/3190236) the Inspector ruled that with regard to a new Plan that is at an early stage of production, the plan’s contents “may be subject to change”. In the Appeal Decision, weight was given to adopted saved policies relating to the existing settlement boundaries that “have not been superseded and therefore still form part of the development plan.” Based on this, it is the adopted settlement limits bordering Quorn that should be used in the preparation of the Neighbourhood Plan rather than draft boundaries shown within the early stages of the emerging Boroughwide plan. In line with the appeal decision, the draft settlement boundaries cannot be given weight.

We submit that the tightening of settlement limits effectively acts as a hurdle to identification and the deliverability of sustainable residential development, in particular at sustainable edge-of-settlement or infill locations. Our clients land is enclosed on three sides by existing development, it is not physically detached from the village to the extent that it could be considered isolated. Whilst it enjoys its own visual characteristics which contribute to a sense of place, this in itself is not sufficient to remove part of the land from the settlement boundary.

The settlement boundary used within the Neighbourhood Plan submission version is not consistent with the recommendations of Inspector guidance established at Rearsby and should be amended for consistency and in order to adhere to the growth objectives of national planning guidance. The proposed tightening of settlement limits is not consistent with national and local growth objectives, particularly in sustainable ‘service centres’ such as Quorn which are relied upon by the Borough to deliver sustainable edge-of-settlement development where appropriate.

## **Conclusions**

I trust that the above provides sufficient information regarding the position of Swithland Homes in response to the Quorn Neighbourhood Plan Submission Version.

At present, we do not consider the submission version Quorn Neighbourhood Plan to be positively-prepared or consistent with national policy, guidance, and objectives. We submit that the methodology used in the preparation of the Neighbourhood Plan, in particular the

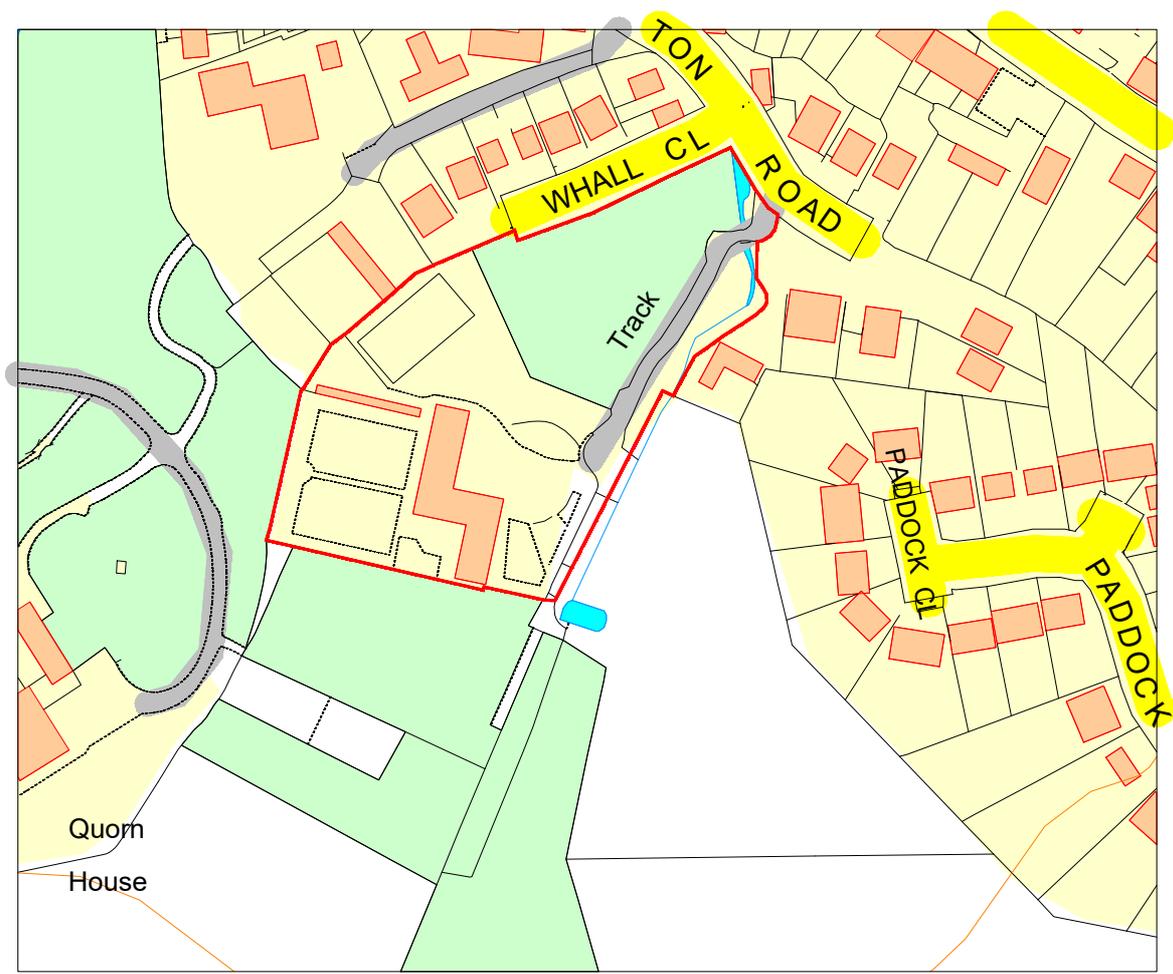
site selection process, has been both secretive and flawed. The application of the methodology used in site selection at the pre-submission and submission stage has been consistently inconsistent.

Kind regards,

Chris Lindley BA (Hons) MSc MRTPI  
**Heaton Planning Ltd**

## Appendix 1

# LAND OFF ARMSTON ROAD, QUORN



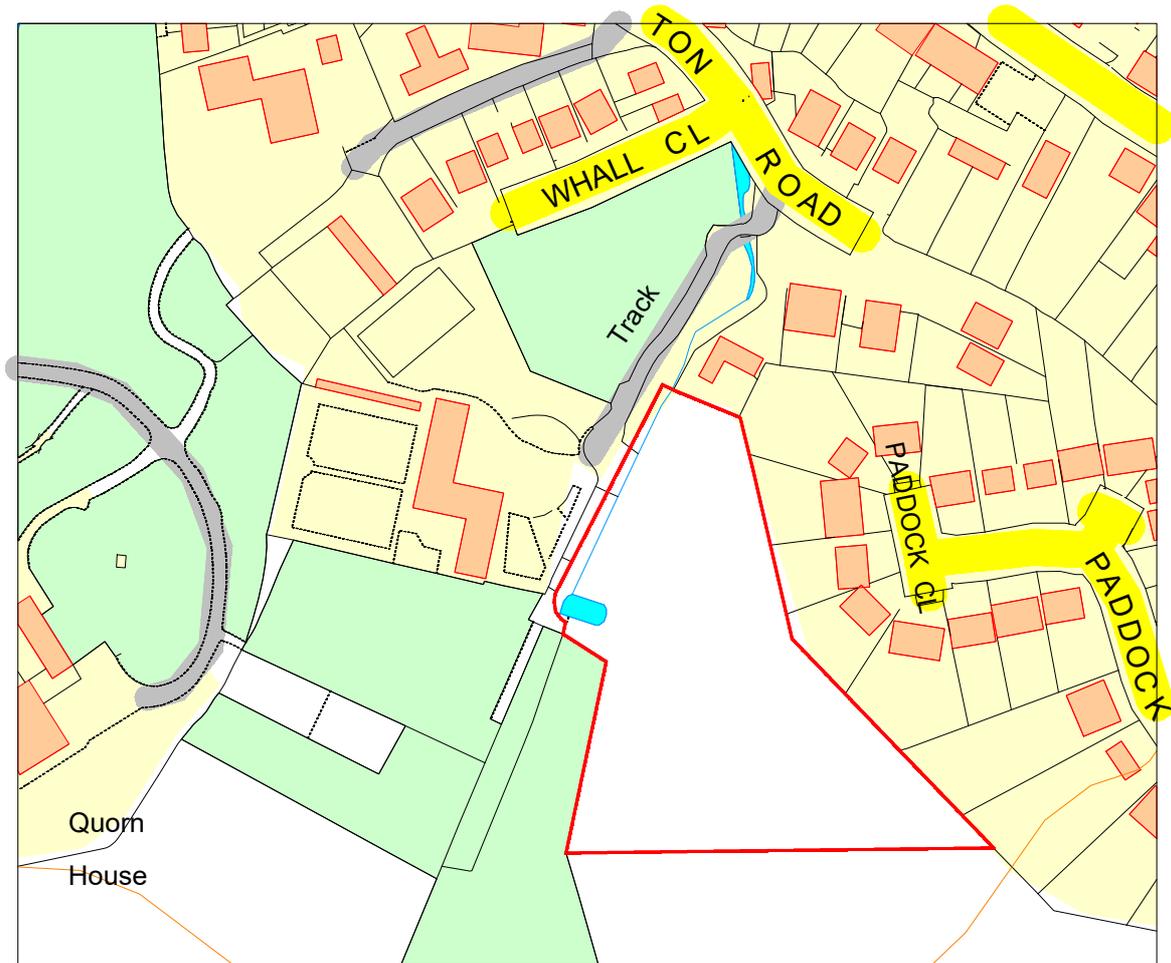
© Crown Copyright and database rights 2018. Ordnance Survey 100023148.

**Key:**

 Site

Client: Swithland Homes		
Project Title: SWI-001-C		
Drawing Title: Location Plan		
Drawing No: SWI-001-C/QuornAR/LP		
<b>Heaton Planning</b>		Heaton Planning Ltd 9 The Square, Keyworth Nottingham NG12 5JT
SCALE :	DATE :	 N
1 : 2500 @ A4	10-Jul-18	
Map data shown may contain Ordnance Survey . products supplied by Pear Technology Services Ltd; Email: info@peartechology.co.uk ) Crown Copyright and database rights from date shown above Ordnance Survey . licence number 100023148		

**LAND SOUTH OF ARMSTON ROAD, WEST  
OF PADDOCK CLOSE, QUORN  
PSH309**



© Crown Copyright and database rights 2018. Ordnance Survey 100023148.

**Key:**

— Site

Client: Swithland Homes		
Project Title: SWI-001-C		
Drawing Title: Location Plan		
Drawing No: SWI-001-C/QuornARWPC/LP		
<b>Heaton Planning</b>		Heaton Planning Ltd 9 The Square, Keyworth Nottingham NG12 5JT
SCALE :	DATE :	▲ N
1 : 2500 @ A4	10-Jul-18	
Map data shown may contain Ordnance Survey . products supplied by Pear Technology Services Ltd; Email: info@peartechology.co.uk ) Crown Copyright and database rights from date shown above Ordnance Survey . licence number 100023148		

## Appendix 3

Appendix 3



-  Application Boundary
-  Existing Trees and Woodland
-  Private Street (To Adoptable Standard)
-  Private Drive
-  Proposed Dwelling (10 no.)
-  Front Garden/Rear Garden
-  Community Open Space
-  Brick Entrance Piers
-  Sustainable Drainage Features

client  
**Swithland Homes**

project title  
**Land off Armston Road, Quorn**

drawing title  
**Illustrative Masterplan**

---

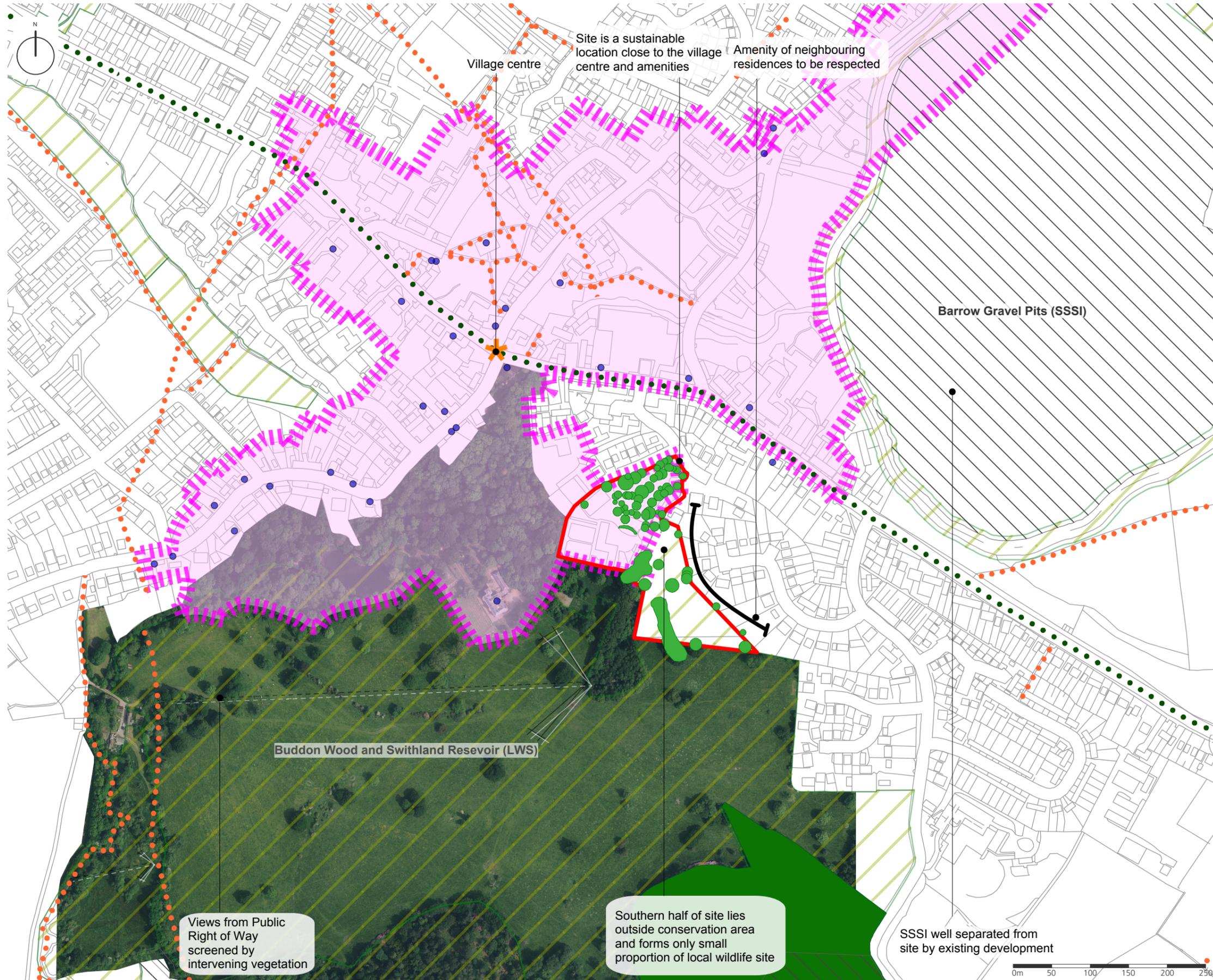
date 03 SEPTEMBER 2018 drawn by RMC  
drawing number edp5095\_d003b checked CG  
scale 1:1,000 @ A3 QA XXX



info@edp-uk.co.uk www.edp-uk.co.uk  
Cirencester 01285 740427 Cardiff 029 21671900 Shrewsbury 01939 211190

## Appendix 4

# Appendix 4



- Site Boundary (2.5ha)
- Conservation Area
- Public Right of Way
- National Cycle Network
- Local Wildlife Site (LWS)
- Ancient Semi-Natural Woodland (ASNW)
- Site of Special Scientific Interest (SSSI)
- Listed Building
- Tree Preservation Order (TPO)

client  
**Swithland Homes**

project title  
**Land Off Amston Road, Quorn**

drawing title  
**Combined Constraints and Opportunities**

date 30 AUGUST 2018 drawn by JGo  
drawing number edp5095\_d002 checked RMC  
scale 1:5000 @ A3 QA **DRAFT**



info@edp-uk.co.uk www.edp-uk.co.uk  
Cirencester 01285 740427 Cardiff 029 21671900 Shrewsbury 01939 211190