

Mrs Linda Walker  
Planning Services  
Charnwood Borough Council  
Council Offices  
Southfield Road  
Loughborough  
LE11 2TX

14<sup>th</sup> November 2022

Your Reference P/22/1539/2

Dear Mrs Walker,

**OBJECTION TO PLANNING APPLICATION REFERENCE P/22/1539/2**

**PROPOSED ERECTION OF 68 NO. SELF-CONTAINED UNITS WITH ASSOCIATED LANDSCAPING AND CAR PARKING – LAND OFF OLD GATE ROAD, THRUSSINGTON, LEICESTERSHIRE**

I am writing in respect of the above Planning Application, and wish to lodge a strong objection to this proposal, which I trust will be taken into account in determining this Application. This objection is made on behalf of Thrussington Parish Council and Thrussington residents, many of whom have also submitted individual objections, such is the level of concern regarding this proposed development.

In summary, this objection relates to the following key matters:

- a) The unsustainable and unsuitable nature of Thrussington for a development of this size and scale and the fundamental conflict with the golden thread of national and local planning policy, which requires the delivery of sustainable development.
- b) The physical and visual detachment of the development from the central core of the village, leading to a fractured community.
- c) The associated landscape and visual impacts of a development of this scale, on a disconnected Site, within a predominantly rural setting.

- d) The inadequate access arrangements and lack of assessment of the impact of this proposal on the local highway network and highway safety.

#### A - Sustainability

1. The NPPF, 2021 is absolutely clear in stating that the purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs (Paragraph 7).

2. Paragraph 8 continues, stating that:

“Achieving sustainable development means that the planning system has 3 overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

3. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (Paragraph 10).

“Paragraph 11 of the Framework establishes that, for decision-taking, this means:

(c) approving development proposals that accord with an up-to-date development plan without delay; or

(d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

4. **Fundamentally, it is our strong submission that this proposal does not represent sustainable development and that the adverse impacts of this proposal would significantly and demonstrably outweigh its benefits, for the following reasons:**

- The village of Thrussington has very limited facilities and services, which are insufficient to support the additional population which would be created through this proposal. The Charnwood Settlement Hierarchy Assessment October 2020 Update, identifies that Thrussington scores a total of only 4 marks, placing it at the very lowest end of the scale in terms of the provision of services and facilities. Indeed, Thrussington only offers 2 essential services – a primary school and high speed broadband (although the high speed broadband is at full capacity, with new subscribers going onto a waiting list).
- In order to access the vast majority of day-to-day requirements, residents of Thrussington must travel a significant distance. The table attached to this letter (Appendix 1) sets out the distances which must be travelled to access these essential services. In particular, we would highlight that Thrussington has no convenience store to meet every day retail needs, nor any employment opportunities, medical facilities or secondary education.
- The nearest settlements offering any realistic prospects for employment are:
  - Leicester (16km distance);
  - Loughborough (15km distance, only accessible via a change of bus in Leicester itself);
  - Melton Mowbray (13km distance).
- Similarly, the nearest key facilities / amenities are:
  - GP in Syston or Sileby – both 6km distance
  - Supermarket in Syston – 6km distance
  - Secondary School in Syston – 6km distance.
- Thrussington has **no** bus service to access these essential day-to-day requirements, and therefore the residents will be entirely reliant upon private car ownership.
- The nearest bus stop to the entrance to this proposed development from Old Gate Road is some 2km away – Leicestershire Highway Design Guide states that an acceptable walking distance to a bus stop in an urban area should be a maximum of 400 metres and desirably no more than 250 metres. In rural areas, the walking distance should not normally be more than 800 metres. With this in mind, it is clear that the residents of this proposal cannot rely upon a public transport service in lieu of private car ownership and that a bus service will not provide a realistic option for new residents.

- Contrary to the assertion of the Applicant's submitted Transport Assessment, the network of PROW or Cycle Routes do not provide a realistic alternative to allow access essential facilities or employment opportunities – these routes, which travel across agricultural farmland, provide recreational opportunities but are highly unlikely to be used to provide access to jobs, secondary education or a supermarket for example.
- As will be detailed further below in Section B, which considers the community impacts of this proposal, we would also stress that the proposed development of 68 no. dwellings will result in an additional population of ca. 163 no. people. The existing population of Thrussington totals only ca. 550 people, with this proposal therefore resulting in a 30% increase in residents. Such a dramatic and significant increase will overwhelm the limited facilities and services within the village, and will detrimentally impact upon the well-being of existing residents.
- Based upon the foregoing, we would stress that this proposal fails to contribute to the three interlinked strands of sustainable development, and will, in fact, result in a housing scheme which is wholly unsustainable. The entire thrust of the planning process, set out throughout the NPPF 2021, is to provide new homes which are of high design quality, which create beautiful and enduring places to live, and which are in locations which are accessible to many essential day-to-day facilities and services by means other than the private car.
- This proposal fundamentally fails to meet these overarching, high level, critical objectives of the planning system, and will result in a generic housing estate, fractured from the existing village and in a wholly unsustainable and inaccessible location, where residents will be forced to utilise a private motor vehicle to access employment, everyday retail requirements and almost every other facility and service.
- The lack of suitability of Thrussington to accommodate a development of such scale appears to be entirely supported by Charnwood's own assessment of the settlement hierarchy, updated in October 2020, which clearly identifies that this village scores very poorly for both essential and desirable services. The lack of any bus service further worsens this position.
- We absolutely accept that all villages are capable of accommodating some level of growth and change over time, with small scale and incremental / organic growth within or immediately adjoining the built environment of the smaller villages providing support to the vitality and viability of the community and its facilities. However, in this case, the scale of the development proposal is quite simply inappropriate for this location and will result in an entirely car dependent development and which therefore fails to address the economic, environmental or social strands of sustainability.

## B – Community

5. Thrussington is a small, compact village, with a central nucleus of built development, centred around Hoby Road and The Green, with further residential properties radiating from this core along Church Lane, Back Lane and Seagrave Road, to the south and north respectively. As one leaves the village, development becomes significantly more sporadic and dispersed, with a distinct shift in character, between the central, historic, nucleated part of the village and the outer edges, where development becomes much more porous, with a predominance of green fields, tree planting and hedgerow boundaries.
6. The proposal envisages the development of a parcel of Greenfield land on the northern edge of the village, in an area which is currently characterised by sporadic built form, within a predominantly agricultural, rural setting. Indeed, the Site currently provides part of the rural backdrop to the central part of the village and has a distinctly rural character, providing part of the important 'porous' edge to the settlement, and an interface between the built form of Thrussington and the open countryside beyond.
7. This proposal is therefore disconnected from the rest of the village, and as a result will essentially form a separate housing estate, effectively leading to urban sprawl, which is so completely at odds with the character of Thrussington and other Leicestershire villages. Policy H1 of the Neighbourhood Plan, which seeks to restrict new development to more limited, small scale residential development within the defined settlement boundary, was introduced to prevent such urban sprawl and therefore to protect the special qualities of the village and its setting.
8. As previously stated, the very limited facilities and services within Thrussington are not able to cope with the 30% increase in population envisaged through this proposal. In particular, the primary school, which lies at the centre of this community, is not of sufficient size to cope with this increase in demand for places. It cannot readily be physically expanded, owing to the constraints of the Site, and therefore this development will lead to either overcrowding or children not being accommodated within catchment, both of which have a detrimental effect on both the education of the children and the community.
9. To create a development of this size in this location is not adding to housing in Thrussington. It is creating a separate hamlet. There are hamlets within this part of Leicestershire with fewer houses and more services that are classed as unsustainable. It therefore seems inconceivable that this development could go ahead; it will be socially divisive and result in a distinct and physically separate estate, which will have little or no visual or community cohesion with the existing settlement of Thrussington.

10. This sense of division and lack of cohesion with the existing community is further exacerbated by the complete lack of public consultation or involvement prior to the formulation or submission of this Application. Paragraph 40 of the Framework indicates that Local Planning Authorities should encourage Applicants to engage with the local community and, where relevant, with statutory and non-statutory consultees, before submitting their applications. Bellway Homes have chosen not to undertake any form of consultation or to involve the Parish Council or local community in the formulation of this proposal, leading to a sense of disengagement with the planning process and a distrust in the intentions of the developer in this case.

### C – Landscape

11. The NPPF is explicit in its requirement for development plan policies and planning decisions to protect and where appropriate, enhance the landscape. Paragraph 174 states that “planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes” and “recognising the intrinsic character and beauty of the countryside”. At paragraph 130(c), it states that “Planning policies and decisions should ensure that developments.....are sympathetic to local character and history, including the surrounding environment and landscape setting”.

12. Policy CS 11 - Landscape and Countryside of the Charnwood Local Plan Core Strategy 2015 states that:

“We will support and protect the character of our landscape and countryside by:

- requiring new developments to protect landscape character and to reinforce sense of place and local distinctiveness by taking account of relevant local Landscape Character Assessments;
- requiring new development to take into account and mitigate its impact on tranquillity;
- requiring new development to maintain the separate identities of our towns and villages;
- supporting rural economic development, or residential development which has a strong relationship with the operational requirements of agriculture, horticulture, forestry and other land-based industries and contributes to a low carbon economy, in accordance with Policy CS10;
- supporting the provision of community services and facilities that meet proven local needs as identified by a Neighbourhood Plan or other community-led plan; and
- supporting rural communities by allowing housing development for local needs in accordance with Policy CS3.
- We will protect the predominantly open and undeveloped character of Areas of Local Separation unless new development clearly maintains the separation between the built-up areas of these settlements.

13. This development proposal fails to accord with the provisions of this Policy or the overarching requirements of the NPPF outlined above. In particular, the proposal will create a development which is at odds with the identified landscape character of the area and which will detrimentally impact upon the sense of place and distinctiveness of this small Wreake Valley village.
14. Charnwood Borough Council have assessed and identified Landscape Character Types within their Landscape Character Assessment, with this Site lying within the Wreake Valley Character Area. The key characteristics of this area are identified as follows:
- River Wreake meanders in a flat bottomed river valley with gently sloping sides. The valley experiences flooding
  - Rural character to east of Broome Lane, East Goscote
  - Leicester City and Syston have an urbanising influences in the west. Limited valley crossings, with the A46 and A607 roads on engineered embankments
  - Area of mixed arable and pasture farming
  - Some neglected and lost hedgerows and hedgerow trees
  - Restored mineral workings
  - Settlements are on the valley slopes, with churches marking villages
  - Main settlements are Ratcliffe on the Wreake, Thrussington, Rearsby, East Goscote, Queniborough and Syston.
15. The Wreake Valley is described as comprising two distinct and contrasting parts: the area east of Broome Lane, East Goscote (including Thrussington) has a rural quality, and the area to the west, where the Wreake joins the Soar, is affected by the urban influences of Syston and Leicester with their significant industry, housing and engineered roads. The eastern area, which incorporates the Application Site, is still predominately rural in character retaining a remote countryside appearance and agricultural character.
16. With this in mind, the landscape character around the larger settlements to the west is created through the variety in land use, thus creating an urbanising effect, whilst in the eastern valley there is a distinct, well-defined, strong tranquil and rural character of the river valley landscape contained by the surrounding landform of rising slopes. It is important therefore that this tranquil and self-contained character of this rural part of the Wreake Valley is conserved and enhanced.
17. Based upon this assessment of landscape character, the Applicant's own LVIA indicates:
- "The landscape character of the site is considered to be medium sensitivity due to the strong character and good structure of the area as described in the proceeding sections. The capacity of the site to accommodate change is considered to be low. Any development of the site should therefore look to minimise impact on the landscape character by conserving the defined characteristics of the area."

18. Given the medium sensitivity of the Site and its strong character, along with its low capacity to accommodate change, it is fundamentally not possible to minimise impact on landscape character by conserving the defined characteristics of the area. These 'defined characteristics' are its openness, its tranquil environment and its vital contribution to the rural setting surrounding the built environment of Thrussington – the proposed residential development of this Site will wholly erode these characteristics.
19. This conclusion replicates that reached by the Inspector in respect of an earlier Appeal relating to a proposal for 32 no. dwellings on this Site (Reference T/APP/X2410/A/92/212483/P2). This Decision, dated December 1992 was clearly made under a completely different planning regime and planning policy framework; however, the Inspector's description of the landscape character of the Site, and the significant detrimental impact of introducing built development into this setting, remain entirely relevant and valid.
20. In particular, the Inspector states:
  - “6. Thrussington is a relatively compact and attractive village containing just over 200 dwellings. It is surrounded by undulating open countryside and your clients' site comprises grazing land outside the identified village boundary on the northern side. There is limited sporadic residential development extending away from the village on Old Gate Lane, but this has frontage to the road whereas this proposal would involve development in depth.
  7. The land rises from the village and I consider that any development would be prominent in views from both the village and the surrounding countryside and be seen as an extension of the village into this attractive countryside. In my view, development at this scale would be significant and would harm both the character and appearance of the village and the surrounding countryside.
  8. You claim that this is an infill site, but this is not a small gap in a small group of houses. There is open land to the south/south west and to the north east which lies outside the identified village envelope. In addition, the dwelling to the east appears detached from the village and is reached via a gravel track, whilst land to the north west is part of the extensive garden of one of the frontage dwellings. This scheme would be at a much higher density than the existing sporadic development to the north of the village and, in my view, would significantly change this open rural character.
  10. Whilst you have suggested that landscaping could reduce the impact of the scheme, I do not consider that it would ameliorate the harm which I have identified or satisfactorily link the development to the village.”
21. We would highlight that this assessment remains entirely applicable to the current proposal, which envisages a significantly greater number of dwellings and a development of greater density than considered by the Inspector previously. As such, we would stress the character of this Site, which contributes to the verdant and rural character of the area. The proposed dwellings, their arrangement and associated infrastructure and paraphernalia would be dispersed across most of the Site and would entirely erode its essentially undeveloped nature and rural character.



22. The proposal would be at odds with the pattern of development in the area resulting in a greater depth of built form from Old Gate Road. It would appear as a dense urban development and would fail to successfully integrate into the edge of the village and would not be an appropriate gateway in and out of the village. The proposed development would not be of an appropriate scale or well-integrated into the area, appearing as an intensively developed and urban development, affecting the setting of the village and resulting in landscape and visual harm, notwithstanding the additional planting proposed.
23. We conclude therefore that the proposed development would adversely affect the character and appearance of the area and the overarching landscape character of the village and its setting. This Application would therefore be contrary to Policy CS 11 of the Charnwood Local Plan and Policy E4 of the Made Neighbourhood Plan which, amongst other things, require new development to be sensitive to its landscape setting; to respect existing landscape character and features and contribute positively to the individual character of a settlement including the setting of the historic built form and features.

#### D – Access

24. The Leicestershire Highway Design Guide instructs potential Applicants to establish certain basic information that could influence a proposal, prior to preparing a development scheme. This includes assessing conditions and facilities surrounding the Site. Examples of such matters to consider include:

- the existing standard of the surrounding road network;
- the extent of publicly maintained highway around the site;
- the existing traffic situation and any congestion, accident or parking problems;
- if the site is well located in terms of existing or planned pedestrian and cycle routes and how far the walking and cycling distances are from such routes;
- how well the site is served by an accessible and frequent public-transport service offering a choice of destinations, the location of and routes to any bus stops and any facilities such as shelters;
- if the site is located on a route where there are planned bus-corridor improvements;
- for new residential developments in particular:
  - how near shops, community or leisure centres, employment areas and so on are located (the Manual for Streets sets out that ‘walkable’ neighbourhoods typically have a range of every-day facilities within 10 minutes walking time – up to 800m);
  - the standard of the routes between the development and these facilities, particularly for walking and cycling and how far the walking and cycling distances are from the facilities;
  - the schools children are likely to attend;
  - the standard of routes to the schools, particularly for walking cycling;
  - any ‘safe routes to school’ proposals; and
  - are the schools able to accommodate more children, for example, what is the existing traffic and parking situation and is there enough classroom capacity.

25. It appears that this development proposal has failed to consider these basic and fundamental elements of the existing conditions surrounding the Site. In addition to the poor range of accessible facilities and services, and complete lack of public transport, (as outlined above within Section A), we would also stress that the road network which is envisaged to serve this development is entirely unsuitable.
26. The scheme is to be accessed off Old Gate Road, which is a single carriageway road, with a narrow pavement along one side only. At points along Old Gate Road, the carriageway width reduces to just 4.4 metres, with a pavement width of just 0.9 metres. Again, the Leicestershire Highways Design Guide indicates within Table DG1, Part 3 that a 'Residential Access Road' should have a carriageway width of 5.5 metres (for developments of between 50 and 400 dwellings).
27. The use of Old Gate Road to serve this proposed development has not been properly assessed through the submitted Transport Assessment and therefore the substandard geometry of this road and its unsuitability to serve a development of 68 no. dwellings has been entirely overlooked by the Applicant.
28. To the north, Old Gate Road becomes a single track road (with no pavement), before meeting the A46 trunk road at an awkward and dangerous junction. Again, the submitted Transport Assessment provides no assessment of this junction or the safety of this route for the additional vehicles created through this proposal. Furthermore, there is no assessment of the suitability or safety of the junction between Old Gate Road and Seagrave Road to the south – whilst the TA does set out the capacity of this junction, it does not provide any consideration of visibility, obstructions created by uncontrolled on-street car parking, or the overall safety of this junction given the significant increase in its use envisaged through this proposal.
29. Paragraph 105 specifically requires the planning system to actively manage patterns of growth to ensure that:
  - (a) the potential impacts of development on transport networks can be addressed;
  - (b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
  - (c) opportunities to promote walking, cycling and public transport use are identified and pursued;
  - (d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
  - (e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.
30. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

31. Paragraph 111 of the NPPF, states that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'.
32. Given the lack of assessment of the key junctions which are critical in providing vehicular access to this proposed development, coupled with the substandard geometry of Old Gate Lane, it is our submission that firstly, the transport impacts of this proposal have not been properly or robustly assessed through the submitted TA, with real gaps in this document, which must be rectified. Secondly, and perhaps most fundamentally, we would stress that the dimensions and geometry of Old Gate Road are not suitable to accommodate this major residential development and the level of additional vehicular movements created through this proposal will lead to an unacceptable impacts upon highway safety, contrary to Paragraph 111 of the NPPF.

### Conclusion and Planning Balance

33. It is acknowledged that Charnwood Borough Council is currently unable to demonstrate a 5 year supply of housing land, and as such, the policies of the adopted Charnwood Local Plan, which are most important for determining this Application, are no longer up-to-date. In accordance with NPPF Paragraph 11 therefore, it is recognised that planning permission should be granted unless:
  - (i) the application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
  - (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
34. The content of this letter has demonstrated that this proposal will lead to a wholly unsustainable form of development which will be entirely reliant upon private car ownership and which will fail to deliver any meaningful benefits under the economic, environmental and societal objectives of the NPPF. Whilst it is recognised that housing delivery is a critical matter for the planning system, this cannot be at any cost, and in this particular case, it is clear that the adverse impacts of this proposal do indeed significantly and demonstrably outweigh the benefits of housing delivery on this Site.
35. Quite simply, this location is unsuitable and unsustainable and cannot support a residential development of such a large scale. The physical and visual separation of the Site from the central part of Thrussington will lead to a fractured and disjointed community. The landscape and visual impacts of this proposal will be significant and highly detrimental, whilst the highway impacts will also result in unacceptable and significant harm.
36. On balance therefore, we would urge your Authority to refuse consent for this proposal.
37. Notwithstanding this 'in principle' objection, we would ask that, should your Authority reach a positive decision in respect of this Application, discussion takes place with Thrussington Parish Council with regard to S106 obligations relating to public open space maintenance, play equipment provision, road safety/highway improvements and possibly other community benefits.

I would be grateful if you could update me on the progress of this Application in due course and advise on whether the Application is to be considered by Planning Committee Members at the appropriate time.

Many thanks and I look forward to hearing from you.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'HB' followed by a long horizontal flourish.

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