

FOA: Jeremy Eaton

Senior Planning Officer
Planning & Regeneration
Charnwood Borough Council
Southfields
Southfields Road
Loughborough
Leicestershire
LE11 2TX

28th July 2021

Dear Jeremy

RE: LAND OFF LECONFIELD ROAD, LOUGHBOROUGH (P/20/2199/2) - RESPONSE TO CHARNWOOD BOROUGH COUNCIL CONSERVATION AND LANDSCAPE COMMENTS (27/04/2021)

I have reviewed the conservation and landscape comments provided by the Borough's Landscape Officer provided on the 27th April 2021 (provided to us on the 7th June 2021) and make the following observations.

The first section of the response deals with the issue of valued landscapes. The Landscape Officer appears to be suggesting that the site constitutes a valued landscape as defined under paragraph 174(a) of the NPPF 2021 that states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);”

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As you will be aware, the site is located within the defined limits of the settlement on white land that does not have any statutory status or identified quality in the Development Plan.

The assessment of value is clearly defined in GLVIA and the test criteria set out under Box 5.1 (GLVIA page 84). This test has been followed in the submitted LVIA concluding that the site has a medium to low value, and in overall terms is considered to be of medium to low landscape sensitivity to residential development.

The LUC Landscape Sensitivity Assessment of SHLAA Sites was carried out on behalf of Charnwood Borough Council and published in March 2019. The objectives of this report are:

“To provide Charnwood Borough Council with a clear and robust evidence to inform the Sustainability Appraisal process and the associated decision making process on site allocations; and

To provide broad guidelines for the development of potential site options which may have the potential to impact on landscape.

Chapter 2 of this study sets out the assessment methodology that states:

“In this study the following definition of sensitivity has been used, which is based on the principles set out in Topic Paper 6. It is also compliant with the third edition of the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3, 2013) as well as definitions used in other landscape sensitivity studies of this type.”

It is therefore unsurprising that the assessment considers issues relating to physical character, natural character, historic landscape character, settlement form/pattern, visual setting, access and recreation, and perceptual aspects/qualities. These factors are entirely consistent with GLVIA and the assessment methodology adopted in the LVIA supporting this application.

The findings of the LUC report were verified through the following process:

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“A structured process of field survey verification was undertaken by landscape experts in order to test and refine the outputs from the desk study. Each of the SHLAA sites was visited to record information and take photographs. The field survey was undertaken from roads and public rights of way to gain an understanding of landscape sensitivity. There was no access to private land.

The fieldwork focused in particular on the relationships between the assessment sites and adjoining settlement, landscape settings and wider views, and perceptual qualities (i.e. levels of tranquillity). It also noted any important features within each area that would be sensitive to change.”

In the LUC study the site was identified as PSH447 and assessed alongside PSH133, the land to the south-west of Burleigh Wood. In this assessment LUC confirmed the site (PSH447) as having a low to moderate landscape sensitivity stating:

“PSH447 has low-moderate landscape sensitivity, as it is more closely associated with existing development and screened from the wider landscape by existing woodland.”

This finding is entirely consistent with the assessment reported in the submitted LVIA.

The first question that we would like to ask is what level of involvement the Borough's Landscape Officer had in the preparation/consultation of the LUC study, and why the Landscape Officer's comments are in direct conflict with the Borough's adopted landscape evidence base? The key question to be asked is whether the Borough's evidence base is fit for purpose, or simply cannot be relied upon for plan making or decision taking? We note that a more recent Landscape Sensitivity Assessment has been published by the Borough (July 2021) that does not provide any further assessment work to support the Landscape Officer's findings.

Secondly, it is notable that the assessment of site PSH447 and PSH133 covers a range of criteria yet the Landscape Officer appears to be reliant on a short summary taken from a single bullet point that considered the form, density and identity of the existing settlement. Whilst she fails to acknowledge all six criteria in full of some twenty-four bullet points, she also fails to consider the overall conclusions that draw a distinction between the character and appearance of PSH447 and PSH133 concluding that the application site is more closely associated with existing

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development and screeded by its wooded setting. This results in the identification of a lower landscape sensitivity for PSH447 that has since been removed as a draft allocation, but PSH133 remains in the draft plan.

This raises a point of consistency. Both PSH133 and PSH447 share an immediate relationship with Burleigh Wood, and as identified in the LUC assessment, PSH447 shares an immediate relationship with the main urban area, it is in fact within the settlement boundary. This in turn results in a reduced landscape sensitivity, as identified by the LUC assessment, therefore bringing into question the basis on which the Borough has drawn distinction between the sites, both in terms of their landscape value and acceptability for development. The evidence base is clear that in landscape terms PSH447 is preferable to PSH133.

The Landscape Officer appears to have placed great weight on the objections raised by the local community. We cannot condone this approach; it is the responsibility of the Landscape Officer to make a balanced and independent assessment of the site and proposal. It is the role of the Planning Officer to make the balanced judgement taking account of local objection.

The site is, and has always been, maintained as private land. Any access to the site has been through trespass, something that cannot be encouraged or supported by the Local Authority. The recent findings of the Local Green Space assessment completed by the Local Authority (May 2021) is quick to distinguish between local objection to housing development, and the genuine pursuit of the protection of a valued landscape, concluding that the site does not constitute Local Green Space. The Landscape Officer's comments must apply the same objective assessment.

The Landscape Officer has to hand the findings of a County Council open space public consultation, specific to the Nanpantan Ward that was used to inform policy in Development Plan. This has to be the starting point for decision making as it is the evidence base that informed the policy context this application will be tested against. This evidence was objectively assessment prior to publication and should be given appropriate weight.

The Landscape Officer identifies views from the site towards the Wolds landscapes to the east. We would question where these views are from. As stated, the site is private and not publicly

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accessible and therefore does not provide any views towards the Wolds. Conversely, looking back from the Wolds landscape to the east of the Soar Valley the site plays a negligible role in views and is seen as part of the wider urban area of Loughborough.

The findings of the LVIA conclude that the development of the site is likely to result in a major to moderate adverse effect to its existing character as an open field. This level of effect is common to the development of most greenfield sites for residential development. An objection to this level of effect is by virtue an objection to greenfield development per se, and an objection to almost all housing allocations in the draft Local Plan that rely upon the development of green field sites. This also highlights the inconsistent approach adopted by the Landscape Officer, providing a response that introduces itself by disagreeing with the findings of the submitted LVIA, and concluding in entire agreement with it. It is incorrect to pick and choose effects recorded in the submitted LVIA, they must be read as a whole taking into consideration short and long-term effects. On the basis the Landscape Officer is in agreement with the short-term site effects it can only assumed there must be agreement with all of the effects recorded in to the LVIA.

In summary, the Landscape Officer's response appears selective, inconsistent, and contradictory. It is at odds with the Boroughs adopted landscape evidence base and assessment findings provided by LUC, a Landscape Institute Registered Practice specialising in landscape assessment. The Landscape Officer's response also relies on evidence provided by local objector groups which is an approach that should not be supported.

We would therefore respectfully request that the Landscape Officer's objection is considered in the context of the issues raised in this letter, and the supporting evidence base documents that are referenced. There is clear consistency between the submitted LVIA and the LUC assessment from 2019. Its is unclear why the Landscape Officer's response is so far removed from these assessment findings, and why there is a lack of consistency between the landscape consideration of this site when compared to other applications and emerging housing allocations in this Borough.

Should you have any queries or require further information please do not hesitate to contact me. We have also prepared a landscape masterplan for the site that provides a better

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understanding of how the buffer to Burleigh Wood will be dealt with in terms of new landscaping, ecological and biodiversity measures, and the incorporation of play provision. This will be submitted under separate cover by our planning consultant.

Best Wishes



Jon Golby

BA Hons (1st) Dip LA (Dist) MA CMLI UDGRP

Director

On behalf of GOLBY AND LUCK LTD



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