From: Suzan Rubins [redacted]
Sent: 16 August 2021 21:33
To: localplans@charnwood.gov.uk
Subject: Please find attached my feedback on the proposed local plan
Attachments: Proposed Developments in Thrussington- md comments.odt

This is from
Suzan Rubins

[redacted]

Feedback in relation to Proposed Developments in Thrussington – HA67 and HA68, page 66 Draft Local Plan

I wish to raise strong objections about the Charnwood Borough Council Draft Local Plan, which proposes to develop areas HA67 and HA68 in Thrussington leading to the construction of 90 new houses, a 37% increase in the number of dwellings in the village.

Whilst I support the local plan overall and appreciate the need for new housing in Charnwood, I believe that the number of houses proposed for Thrussington is disproportionate and excessive in terms of sustainability.

Sustainability: public transport

The proposal for housing on two sites in Thrussington is based on unsubstantiated facts about the village, which makes the draft local plan unsound. The accessibility criteria in the draft local plan were relaxed for public transport frequency (from high to low frequency) in order for the plan to identify more sites. This meant that Thrussington was considered but there are no public service buses serving Thrussington and it should not have been included. That makes the draft local plan UNSOUND.

Sustainability is a paramount in the creation of a draft local plan and Thrussington does NOT meet the criteria the Council has set out for the sustainability test. In 2019 the limited bus service (no.128) serving the village was replaced by DRT (Demand Responsive Transport), which has not worked successfully for it is inflexible and administratively difficult to manage by the user. The sustainability test for development cannot be proven for Thrussington.

Sustainability: access to jobs and services

Charnwood's sustainability requirements and development strategy is to reduce car use, reduce distances travelled and to increase the use of public transport. (Charnwood Local Plan 2021-37 Pre-submission draft July 2021, Chapter 1, P15). The development strategy is to direct development to locations that provide access to jobs, services, and other facilities where there are alternatives to using the private car. (Charnwood Local Plan 2021-37 Pre-submission draft July 2021, Chapter 2, P18, 2.4.) Proposing two developments in Thrussington does not meet these sustainability requirements: therefore, the draft local plan is unsound.

There is no access to a GP surgery which is a requirement for sustainability. The nearest is 6km in Syston (and not in East Goscote as stated). This is too far for anyone to walk, particularly if they are unwell or have a baby or small child.

There is no convenience store only a deli and teashop which has limited, expensive products and has limited opening hours. It closes two afternoons a week and a full day on Monday. On other days it only opens 9am to 5pm. The nearest is 3.5km away in East Goscote, making a 7km round trip on foot for anyone without a car.

The village infrastructure and utilities (water pressure, sewage, broadband etc) have not been assessed for capacity to take the additional 90 houses from these developments.

Traffic: increase in traffic

Traffic movement will be increased in the village because

1. Thrussington has no bus service. The nearest bus stop is 2km away in Rearsby.

2. There is no general convenience householders have to drive to access a convenience store, particularly as the deli is open limited hours and.

3. Commercial vehicles will need to service the proposed two sites.

4. Extra vehicles from the 2 proposed developments.

As a detailed local Thrussington traffic assessment has not been undertaken, the draft local plan is unsound. The Planning Officer confirmed the transport assessment is Borough wide and strategic in nature and that it included 60 homes on Old Gate Road but no new homes on Hoby Road. HA67 was added to the plan after May 2021 when the strategic highway assessment was undertaken.

Traffic: dangerous junctions and school crossing

Old Gate Road is a variable size single track road to the A46, where vehicles must drive on the verge to pass. At the north end there is a tight blind ninety-degree bend and no run on or run out to join or leave the A46 south carriageway, which is an extremely fast road. It is very dangerous. Therefore, traffic wanting to join the A46 to travel in either direction from HA68 will have to negotiate a difficult blind hair pin bend at the junction with Seagrave Road to avoid the village centre. Vehicles will have to cross oncoming traffic and the turning circle on that bend is too tight for HGVs.

The junction of Old Gate Road with Seagrave Road is difficult as it is a joins at the main road at an acute angle creating a sharp turn for right -turners heading towards the A46. It is also difficult to see around to see if traffic is approaching from the A46 direction. This junction is used very little at present due to the limited number of houses on the road but is likely become a critical incident spot. Opposite this junction none of the current houses have off road parking, so the road always has parked cars on either side making it very difficult to navigate.

Throughout Thrussington village there is extensive on road parking due to the number of dwellings with no off road parking. The houses opposite the Seagrave Road/Old Gate Road junction have no off road parking and this means that the streets are always lined with cars opposite the junction. This limits visibility in each direction. Also, the house at the east junction of Old Gate Road has no off road parking and the residents usually park two cars on the street very close to this junction – picture attached.

The other site on Hoby Road (HA67) is almost adjacent to the traffic calming measures which were put in after evidence was obtained of speedy traffic entering and leaving the village. The site is also near a busy primary school which does not have it's own on-site parking. This means that on street parking around pick up and drop off time causes a hazardous area at this part of the village a few hours a day. Again, the cottages opposite the school have no off street parking and this means that cars are again parked on the street all the time. The village hall is very close to this site and has only a few parking spaces. When it is used for an event (even a yoga class) there is often overspill onto the road.

Cars also enter the village at speed along the Hoby Road, Speed checks resulted in traffic calming measures on Hoby Road with more proposed. Traffic from the proposed site HA67 traffic would have to pass Thrussington Primary School which, is extremely congested at drop off and pick up times due to the fact it has no car park. The Thrussington village delicatessen shop, which has a café attracts many cyclists and horse riders as well as walkers who use the village Green as a place to take rest and have food and drinks. These non driver visitors add to the hazardous roads.

On street parking throughout the village often means there is only room for one car to pass at a time and obscured views around parked cars already makes driving difficult. More traffic would add further safety concerns. No valid traffic assessment has been undertaken and so safety, congestion and parking in the village, parish area and near the school have not been properly considered.

Character:

Thrussington is recognised for its historic nucleated form which lies on lower ground adjacent to the River Wreake. HA68 has higher levels of sensitivity to residential development as it is located on higher ground and potentially will alter the historic form of the settlement. This is rated as moderate by Charnwood (Landscape Sensitivity Assessment of SHLAA Sites (March 2019), P175, Key Landscape Sensitivities) and yet is incorrectly downgraded during the assessment (Charnwood Local Plan Sustainability Appraisal May 21, para 6.2.8, page 61) to minor positive. The Neighbourhood Plan (Thrussington Neighbourhood Plan 2018) states: 'Vision: to protect and enhance the character and identity of the Parish of Thrussington' and that new residential developments should be within the settlement boundary.

Charnwood Housing delivery study states new developments for 'Other Settlements' (i.e., Thrussington) should be within the settlement boundary Housing Delivery Study for draft local plan Dec 2017, P85). Therefore, Charnwood's own rules show that these developments are unsound.

A planning application (P/91/0397/2) for 34 single-story houses based on the site of HA68 was rejected. The Planning Inspectorate in 1992 wrote 'the resultant harm to the character and appearance of both village and surrounding countryside would be so serious as to form a compelling reason for resisting this appeal'. Therefore, the proposal in the draft local plan has already been found to be unsound. 13.The appeal inspector to planning application P/12/0997/2 for one house (opposite side of Old Gate Road to HA68) wrote 'I conclude that the proposal would not achieve a sustainable pattern of development and would be harmful to the character and appearance of the area'. 14. HA67 site planning application P/01/0243/2 was refused, and P/05/3791/2 withdrawn. Therefore, the proposal in the draft local plan has already been found to be unsound.

Environment:

The draft local plan supports sustainable development that 'protects the intrinsic character of the countryside' and 'safeguards and delivers a net gain in biodiversity' (Charnwood Local Plan 2021-37 Pre-submission draft July 2021, Policy DS1, P30.). The proposed Thrussington development does not meet these requirements: therefore, once more the draft local plan is unsound.

The proposed developments take no notice of the wildlife corridors identified in the Village Neighbourhood Plan and the draft Charnwood Local Plan does not take this plan into account, even though it was adopted by the Borough Council in 2018. The development proposed at HA68 would cause damaging fragmentation of the wildlife corridors in this area. These have been identified to be protected within the Neighbourhood Plan and Old Gate Road also has ancient hedgerows.

Climate change:

Policy CC5 (Sustainable Transport) requires development to be within 400m of public transport stops. Clearly (Charnwood Local Plan Sustainability Appraisal May 21, P110 para 7.8.9)

Flooding:

Thrussington situated on the River Wreake. In wet weather the water runoff that will occur from new developments draining to the river risks overloading the village watercourse system. This has happened regularly, causing flood damage to homes on Rearsby Road and The Green. Flooding in the last 5 years has meant that the road between Thrussington and Rearsby has been closed for a number of days when the road is under water. Water streams down Old Gate Road on days of heavy rain and as drains fill a 'river' of water gushes into the village and Rearsby Road (near the junction with Ratcliffe Road) has been flooded on a number of occasions. Due to the incline, any run off caused by further hard surfaces on Old Gate Road would make this flood problem dramatically worse.

The Environment Agency currently show this area around the Green as HIGH risk from surface water flooding with predicted depths that would enter and damage property.

Neighbourhood Plan 2018:

The Thrussington Neighbourhood plan was written after extensive village consultation and passed on referendum of the whole village. It has been signed off and adopted in full by Charnwood Borough Council. The protection of the character, identity, historic features, biodiversity, traffic reduction and new development principles are important lifelong features that many villagers would support being continued ..

The Neighbour Plan also lists a number of important 'Key Views' and five of these are centred around the junction of Seagrave Road and Old Gate Road. The views shown as 1 (View south west from Old Gate Road) and 5 (View south east along Seagrave Road) would be are adversely affected.

The Neighbourhood Plan highlights key issues of parking, no play facilities and flooding. There is no evidence that the draft local plan has considered the issues and policies of the Neighbourhood Plan.

Summary

For the reasons outlined I consider the draft Charnwood Local Plan proposing developments on the sites of HA67 and HA 68 is UNSOUND and wish my objections to be heard at the Public Inquiry. The village and its very limited facilities cannot sustain a significantly greater population than it currently has without harmful impacts on the village character, safety and the local environment .

If there has to be some development in the village it should be proportionate to the small size of the village and no more than 20 new homes should be built. In this respect the Hoby Road site HA67 limited to 20 dwellings could be pursued. The Neighbourhood Plan identifies a need for starter homes and those suitable for older people and that is the type of housing that should be provided if development should be deemed essential in this village.

However, Thrussington does NOT meet the criteria the Council has set out for the sustainability test. This is contrary to the strategy of the draft local plan. The draft local plan has taken no account of the recently completed Neighbourhood Plan which was adopted by Charnwood Borough Council.

Yours faithfully,

[redacted]

Suzan Rubins, [redacted]