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# OBJECTING TO THE RUTLAND LOCAL PLAN 2020

## - GUIDANCE NOTES PREPARED BY FIGHT4RUTLAND

### 1 Background to the Local Plan

There are 3 useful videos on the Rutland County Council website summarizing:

- Rutland's Local Plan – The Journey so far
- Rutland's Local Plan – Where we are now? An Introduction to Regulation 19
- Rutland's Local Plan – How to take part in the Consultation

If you want to know more about the Local Plan we would recommend that all the videos are viewed to give perspective to the potential objections and modifications to the plan.

All 3 videos can be accessed here:

<https://www.rutland.gov.uk/my-services/planning-and-building-control/planning/planning-policy/local-plan-review/>

#### 1.1 The Local Plan

The Local Plan itself is a 296-page document together with a mass of appendices! We think it is unrealistic for members of the public to have to both:

- a) Read and understand the documentation and
- b) Form opinions of which sections of the plan are both:
  - i) legally compliant and
  - ii) pass the 4 tests of soundness (positively prepared, justified, effective and consistent with national policy)

### 2 The Objection

Objecting to the building of a new town, half as big again as Uppingham, on the St Georges Barracks site (SGB) is not made easy by the technical requirements of that objection. **DO NOT BE PUT OFF!**

It is not enough to say you simply cannot see the sense of dumping 2,315 tightly packed modern dwellings in our rural county given the impact it will have. Over 1500 people did that in 2018, they were ignored. Despite the objections RCC have produced a Local Plan which has SGB at its heart.

That Plan will now go before an independent Inspector and objections at this stage must be confined to whether the Plan is Legally Compliant or Sound.

Putting “legally compliant” aside (Fight4Rutland has recruited experts to assist with putting forward objections at this level), “Soundness” must relate to specific requirements set out in the National Policy Planning Framework (NPPF), and be related to specific policies or chapters of the Local Plan.

The official online response form (and downloadable versions) might look like they have been designed to confuse, with an assumption of knowledge of planning jargon. We are however simply following a process that is laid down by law, so our job at Fight4Rutland is to simplify the process as far as possible.

## 2.1 Objecting as an Individual

We are working on the assumption that there are a large number of individuals across Rutland across all age groups, genders, ethnicities etc. who would NOT like to see a new town, of the size contained in the Local Plan, built on the site of St Georges’s Barracks but would not object to a smaller development

## 2.2 Options for Submitting Your Objections to the Plan

If you would like to object to the plan on this basis, there are several options:

### 2.2.1 [Sign up to support the full set of objections and modifications proposed by Fight4Rutland](#)

This is a fully comprehensive set of objections plus proposed modifications, set out in a way that is designed for ease of reading and understanding by both Rutland County Council Planners and the Independent Planning Inspector. The Independent Planning Inspector will ultimately consider whether or not these objections/modifications are valid and recommend accordingly

### 2.2.2 Submit your objections via the online portal

Online portal link here: <https://www.rutland.gov.uk/my-services/planning-and-building-control/planning/planning-policy/local-plan-review/> - you must scroll down to the heading “How to take part in the consultation “ and click on “Online response form”




You will then be taken to a sign up portal which looks like this:

**Rutland Local Plan 2018-2036 Pre-submission  
Online Consultation Portal**

Please register here in order to make representations on the Local Plan Pre-submission Consultation.  
Please login if you have already completed the registration process.

| New User                                      | Returning User                        |
|---|---------------------------------------|
| Username:<br><input type="text"/>             | Username:<br><input type="text"/>     |
| Password:<br><input type="password"/>         | Password:<br><input type="password"/> |
| Confirm password:<br><input type="password"/> | <input type="button" value="Submit"/> |
| Email address:<br><input type="text"/>        | <a href="#">Forgot Password?</a>      |
| <input type="button" value="Submit"/>         |                                       |

Powered by  formsite

Please complete your details in order to reach the online portal:

This online form is made up of four parts:

- Part A – Contact Details
- Part B – Your Representation
- Part C – Future Notifications
- Part D – Other Monitoring Information

#### [2.2.2.1 PART A](#)

Your contact information

#### [2.2.2.2 PART B](#)

It is important to complete Part B in the specific way requested.

Each representation / objection needs to be submitted individually. For each representation you will be asked “Which part of the Pre-submission Local Plan does this representation relate to?” Check the appropriate Section then click “Next”

Rutland Local Plan 2018-2036 Pre-submission Consultation

13% Complete

### Part B: Which part of the Pre-submission Local Plan does this representation relate to?

Please note, you must submit separate representations for each of the policies, paragraphs, figures, tables or policy maps that you wish to make comments on, therefore you can only select which chapter this specific representation relates to.

Please tick which part of the Pre-submission Local Plan that this representation relates to here: \*

- Chapter 1. Introduction
- Chapter 2. Spatial Portrait
- Chapter 3. The Vision and Strategic Objectives
- Chapter 4. Spatial Strategy and Location of Development
- Chapter 5. Delivering Quality New Homes
- Chapter 6. Employment and Economic Development
- Chapter 7. Sustaining our Environment
- Chapter 8. Sustainable Communities
- Chapter 9. Minerals and Waste
- Chapter 10. Implementation and Monitoring Framework
- Appendix 1: Strategic policies
- Appendix 2: List of replaced local plan policies
- Appendix 3: Agricultural, forestry and other occupational dwellings
- Appendix 4: Parking standards
- Appendix 5: Designated heritage assets in Rutland
- Appendix 6: Open space standards
- Glossary
- Policy Maps
- Whole Plan

<< Previous   Save Progress   Next >>

You will then be asked Please select which paragraph, policy or table in Chapter X that this representation relates to. You must select from the drop down menu:

- Policy H1 - Site H1.9 - West of 17 Whitwell Road, Empingham
- Policy H1 - Site H1.10 - Southview Farm, Empingham
- Policy H1 - Site H1.11 - Adjacent to Chater House, High Street Ketton
- Policy H1 - Site H1.12 - The Crescent, High Street, Ketton
- Policy H1 - Site H1.13 - Home Farm Ketton
- Policy H1 - Site H1.14 - Main Street, Market Overton
- Policy H1 - Site H1.15 - River Gwash Trout Farm, Belmesthorpe Lane, Ryhall
- Policy H1 - Site H1.16 - Land to the South-West of Belmesthorpe Lane, Ryhall
- Policy H1 - Site H1.17 - Land off Melton Road, Whissendine
- Policy H1 - Site H1.18 - South Lodge Farm, Whissendine
- Policy H2 - St George's Garden Community Development and Delivery Principles
- Policy H2 - Site H2 - St George's Garden community
- Policy H3 - St George's Garden Community Development Requirements
- Policy H4 - Cross Boundary Development Opportunity - Stamford North
- Policy H5 - Housing density
- Policy H6 - Meeting All Housing Needs
- Policy H7 - Accessibility Standards
- Policy H8 - Self-build and custom housebuilding
- Policy H9 - Affordable housing
- Policy H10 - Rural Exception Housing
- Policy H11 - Gypsies and Travellers
- Table 1: Calculation of Residual Minimum Housing Requirement, 2018-36
- Table 2: Housing completions, commitments and proposed sites by settlement
- Table 3: Housing Mix

Select and Click "Next".

Legal Compliance – You will be asked "Do you consider the Pre-submission Local Plan to be legally compliant?" – click YES. Click "Next"

You will be asked "Do you have any comments on the Legal Compliance of the Plan?" – click NO then click "Next"

SOUNDNESS - You will be asked “Do you consider the Pre-submission Local Plan to be sound?” – click NO then click Next

TEST OF SOUNDNESS - You will be asked “As you consider that the Pre-submission Local Plan is not sound please select which test(s) of soundness this relates to” – check ALL boxes (positively prepared, effective, justified, consistent with national policy) - click Next

You will also be asked to “Please provide an explanation for your answer below” – here you put your own words or you can refer to some of the model answers on the Fight4Rutland website here: XXXXXXXXX

NB: It is important that this is not just a cut and paste but your answer is your own version of the model answer

Click Next.

MODIFICATIONS - You will be asked “Please set out the modification(s) you consider necessary to make the Pre-submission Local Plan legally compliant and/ or sound, including any revised wording - here you put your own words or you can refer to some of the model answers on the Fight4Rutland website here: XXXXXXXXX

Alternatively you can write N/A in the box which means you have no modification to offer

Click Next

Participation at the Examination - You will be asked “If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?”

When we get to the Oral Examination, we suggest that this is limited to a small number of expert, well informed participants, however you are perfectly entitled to attend and check YES if you want to.

We recommend that you answer NO to this section or if you have not offered a modification check “I am not seeking a modification”

Click Next

### 2.2.2.3 Part C: Future Notification of Local Plan Progress

Please tick if you wish to be notified of the following stages of the Local Plan

### 2.2.2.4 Part D: Other Monitoring Information

Please complete as necessary

Click Next then click Submit

PLEASE NOTE THAT FOR ECH SUBMISSION / OBJECTION, YOU WILL NEED TO CARRY OUT THE SAME PROCESS.

## 2.2.3 Submit your written response via the downloadable Rutland Response Forms For a single representation multiple representations/objections

This video explains how to take part:



If you're unable to complete the online consultation form, download a response form or response booklet (for multiple representations) and email it to [localplan@rutland.gov.uk](mailto:localplan@rutland.gov.uk):

- [response form \(single representation\)](#)
- [response booklet \(multiple representations\)](#)

If you know somebody who would like to take part, but they're unable to access the internet, they can call [01572 722577](tel:01572722577) to ask us for:

## 2.2.4 Email your written comments to Rutland County Council.

You can email your comments to [localplan@rutland.gov.uk](mailto:localplan@rutland.gov.uk), or by providing a hard copy to Catmose, ask for receipt.

## 2.2.5 GENERAL NOTE ON ALL RESPONSES

PLEASE NOTE: What you must do in all circumstances, is link your comments to a specific issue or Policy and say you are challenging soundness of the Plan and why.

## 2.3 Sample Objection Format

In order to help you to formulate your own worded objections to the plan, the following are guidelines which can help you:

Start your objection by stating: “I am objecting to the Local Plan Chapter 3 Vision and Objectives which is unsound because it is inconsistent with national policy. Then choose from your own objections or cherry pick from below.

The following bullet points will link what we perceive to be the major areas of objections with relevant policies. Many of the reasons for objecting will be relevant across the soundness of a number of policies.

The first two sections which will encompass most peoples objections. The objection is more important than detail.

### 2.3.1 OBJECTION1 - VISION AND OBJECTIVES - CHAPTER 3

#### 2.3.1.1 *NOT SOUND BECAUSE... NOT CONSISTENT WITH NATIONAL POLICY*

- The absolute bedrock of a Local Plan is community support for their place. NPPF PARA 16 “the Local Plan should be shaped by early proportionate and effective engagement between Plan makers and communities.
- The Plan states that the vision for Rutland has been “developed by the Council together with partners and stakeholders”. Simply not true , from the start of this Plan process in 2015 to the final Plan produced in December 2019 there have been a variety of vision statements. No Parish Council can remember being consulted on the latest version and presumably they are major stakeholders.
- An external review of RCC in November 2019 found the major weakness of the Council to be that they communicated , but did not consult. The vision statement in the Plan is testimony to that conclusion.
- The latest Corporate Plan has a major strategic priority to consult Rutlanders on a 50 year vision for the County, supposed to be finished by March 2020. Never even started, but in any event what is the point if RCC have already decided the future of Rutland in their Local Plan.
- 1500 objections were simply ignored.

### 2.3.2 OBJECTION 2 - POLICY H2 ST. GEORGES GARDEN COMMUNITY

#### 2.3.2.1 *NOT SOUND BECAUSE INCONSISTENT WITH MEETING SUSTAINABLE DEVELOPMENT*

- Does not have local support as demonstrated by the totally unprecedented opposition at the earlier stage in the development process. Plans should be shaped by communities.
- Para 127 of the national policy framework requires developments to “be sympathetic to local character including the surrounding built environment and landscape. SGB out of character



- Offends the Government's aspirations for climate change, therefore not consistent with national policy. The lack of public transport means it will be almost totally car dependant. See Policy SC2 below. A study of 20 existing so called Garden Villages, SGB is a Garden Village, published earlier this year definitively concluded that they were all car dependant commuter dormitory towns.
- The development of SGB has been a given since the clandestine signing of the Memorandum of Understanding between RCC and the MOD in 2017. Evidence has been collected to support this policy, not to shape it. Not an appropriate policy taking into account reasonable alternatives, the favoured alternative was pre determined.

### 2.3.3 OBJECTION 3 - POLICY SC2 SECURING SUSTAINABLE TRANSPORT

#### 2.3.3.1 *NOT SOUND BECAUSE - TRANSPORT ASSESSMENT INADEQUATE*

- NPPF requires sustainable transport, not cars, will be enabled, and significant impacts on the transport network can be cost effectively mitigated.
- The site can only be connected to the A road network by narrow rural roads totally incapable of taking the traffic generated by demolition, construction and occupation. Junction improvements, timescales cost and funding are vague or non existent. Highways England are wary of the impact on A1 junctions
- The impact on horse and cart roads is not considered, e.g Empingham Main St, Ketton cross roads
- The traffic count which is the mainstay of the traffic generation was a single day October 2017. Missing school holidays and the lure of Rutland Water.
- Traffic generation modelled on settlements much nearer other settlements
- Bus services are sporadic in Rutland , recently much reduced when the bus depot in Melton closed. References to pump priming public transport are vague, not costed and not franked by any operators.

### 2.3.4 OBJECTION 4 - DELIVERING QUALITY HOMES POLICY H6

#### 2.3.4.1 *NOT SOUND BECAUSE- NOT POSITIVELY PREPARED EVIDENCE BEEN MADE TO FIT AN MOD REQUIREMENT NOT THE LOCAL AREA.*

- NPPF requires that plans should be able to deliver the area's Objectively Assessed Housing Need, for Rutland that is 127 dwellings per annum. RCC are planning to ignore the national guidance.
- RCC are planning to over provide by 25%, in fact 29%, to achieve "choice and contingency and address issues of affordability". In fact the numbers are driven by the MOD's minimum requirements dictated to the Council for housing numbers at SGB ie 2315. The major reason for the over provision is this figure.
- To pretend that the Council will dictate delivery schedules and thus house prices is silly. Developers have the power. To pretend that the housing market is confined to Rutland's boundaries, i.e. 14 miles by 20 miles is also silly.

- RCC made much of the fact that SGB will provide 30% affordable housing implying that the site will enable young Rutland residents to live in the County. Affordable is a largely meaningless construct, being a fixed arithmetic relationship to local house prices and rents. It does not necessarily mean affordable to a low income household in Rutland. We were promised a Rutland definition of affordability in the latest Corporate Plan. It never materialized.
- Affordability is not site specific, the 30% criteria can apply to any site over 10 dwellings. By concentrating affordable housing on SGB the problems for low income families will be worsened, since such families would much prefer to live on the outskirts of Oakham or Uppingham with facilities in easy reach.
- RCC imply that because SGB is a brownfield site it must be developed. Not true, such sites must certainly be considered, but not necessarily developed or even first in line. Where the brownfield is itself in an isolated rural situation it is certainly not the first stop. Para 118 c of NPPF “ give substantial weight to the value of using suitable brownfield land **within settlements**

### 2.3.5 OBJECTION 4 - POLICY H4 STAMFORD NORTH

#### 2.3.5.1 *NOT SOUND BECAUSE - INCLUDING STAMFORD N. IN HOUSING NUMBERS NOT CONSIDERED AS A REASONABLE ALTERNATIVE.*

- To the astonishment of South Kesteven Councillors RCC decided to gift 605 dwellings to be built in Rutland to count in South Kestevens housing numbers. Again the only reason can be to accommodate the numbers dictated by the MOD for SGB. If these numbers were included RCC would be over providing houses by an astonishing 55%
- This site originally was described as a bonus as it would lessen the housing requirements elsewhere in Rutland. Somewhere along the line that shifted, obviously because it made the numbers including SGB look ridiculous.
- RCC have hidden behind a non existent Statement of Common Ground to justify this transfer