

**PRE-SUBMISSION LOCAL PLAN REGULATION-19**

**CONSULTATION RESPONSE**

**FROM:** MORCOTT PARISH COUNCIL

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**DATE:** 4<sup>th</sup> November 2020.

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**Please acknowledge this response and send me a Respondent Number.**

**Part B – Our Representation**

Paragraph Number	<b>B1.9 – 1.11</b>
Policy Number	
Table Number	
Figure Number	
Appendix	
Policies Map Reference	

*(Population Projections)*

**2a. Do you consider the Pre-Submission Local Plan to be legally compliant?**

Yes

No

The 2017 Local Plan had, at its heart, a spatial strategy and settlement pattern that emerged and evolved from the long-followed strategy in Rutland, as reflected in previously adopted Local Plans. It directed new development primarily to the existing towns of Oakham and Uppingham and the 10 Local Service Centres. These are the larger villages, which already had many services, albeit villages had different facilities. These locations were considered to be the most suitable in planning terms to direct future development, thereby following closely the principles of sustainable development that underpin successive Governments national planning guidance. Furthermore this 2017 Plan was supported by and underpinned by a Sustainability Appraisal that was prepared alongside the Local Plan.

In July 2018, a new Rutland Development Plan document was published for consultation which changed the long followed strategic approach fundamentally. The detail relating to St. George's Barracks (SGB) proposal will be covered elsewhere in response to policies SD2 and H2. Importantly, however, this cannot be considered to be a Regulation-18 Plan which has replaced the 2017 Local Plan. Despite radically altering the whole spatial strategy of the 2017 Local Plan,

no attempt was made to provide a fully integrated new Reg.18 document. Instead, what was produced was a document which introduced the idea of a new community at St George's Barracks and a significant change to where new development up to 2036 would be promoted. It identified, but only in the most broad and unspecified terms, how this may affect the 2017 Reg. 18 distribution. It was, for example, silent on the matter of any details of the implications of this proposal on previously identified sites elsewhere.

There was nothing that could be judged to be a sound planning argument preferred either for deciding to move towards the creation of a new settlement to concentrate future development, let alone a comparison of possible locations other than the SGB site. The only explanation for this significant redirection was that a site was made available by the MoD and serious pressure placed on the Local Planning Authority to achieve as much new development, particularly housing, on the site as possible. There was also no sound planning explanation offered at July 2018 as to why sites, several of which are local, promoted by RCC in the 2017 Plan, should suddenly be rendered as not suitable for development. Or are we to assume that they are still viable sites and of course could come forward in due course as windfalls, with RCC faced with the difficult dilemma of finding viable reasons for refusing development on sites they themselves have promoted as recently as July 2017.

**The lack of a fully integrated Reg.18 Document giving the residents and stakeholders the opportunity to comment on a proper co-ordinated plan is clearly contrary to Government guidance on proper plan-making procedures. This provides evidence and demonstrates that the plan making process has not been legally compliant.**

Moreover, the July 2018 consultation generated a relatively large level of response, compared say to that at the 2017 stage. These responses were generally hostile and against the thrust of this totally new spatial strategy. They were largely ignored and had not been properly weighed off before RCC arrived at the Reg. 19 document. The process flaws also extend to the lack of a full Sustainability Appraisal prepared alongside the Reg.19 - 2020 Local Plan, as government guidance dictates. Rather, it is an add-on trying to retrofit a sustainable justification to a new pattern of development in Rutland that is anything but sustainable. Many other background documents produced at the behest of RCC, and we understand the MoD, and funded accordingly have also sought to retrofit a justification to a plan, rather than be the up front research and information upon which a Local Plan should be prepared.

The original timetable for consultation on this Local Plan was to be in the early months of 2020. Then the Covid-19 pandemic caused an inevitable and totally justifiable halt to this process. It was clear that, with the country in lockdown, consulting on such an important new Reg.19 Plan would be impossible and iniquitous. Gaining access to the Plan at all would disenfranchise everybody without access to the internet. Any opportunity to have direct contact with Rutland members and officers, through events like road shows (which would normally accompany a local plan consultation and were held in 2017) also could not happen. RCC was therefore to be commended for doing this. What, however, is less clear is why it considered that holding the consultation as soon as August-October 2020 (since extended to November, due to errors in the consultation document) was acceptable. The virus is still very much with us, gaining access to paper copies of the Plan is difficult for example, and there is still no opportunity for direct, face-to-face discussion with those promoting the Local Plan.

Further and almost uniquely an issue for development planning, the impacts of this particular pandemic have changed the way people have lived, worked and interacted with each other.

Some of these changes could have lasting impacts well beyond the life of the pandemic. It is therefore likely that a lot of the information and assumptions that would underpin a new development plan are now being questioned. It is of course impossible to assess how this will actually change things. We can say with some certainty that they will and that therefore setting in stone a development plan for the next 15 years, and beyond in some cases, is not what RCC should now be doing.

This must be a direct challenge to both the legality and soundness of the process and timing of the consultation.

**B4 Modification considered necessary**

The lack of a fully integrated Reg.18 Local Plan, which could have been consulted on in its entirety, has left residents and stakeholders only able to respond, in this very proscribed and limited way, to the Reg-19 Plan, which has clearly not evolved from the 2017 Local Plan, taking account of consultation responses. It is clearly a new plan. Therefore we would argue RCC should be asked to go back to the drawing board and withdraw this Reg-19 Plan and at the very least produce a new Reg.18 Plan for proper public consultation and preferably one that has been put together with evidence of close working with the communities affected.

Although there can be no modification that can stop this consultation process, it has to be questioned whether carrying it out whilst the county, as with the whole country, is still in the grip of the most significant health crisis, with many (including the current Government) claiming it to be the biggest challenge we face since 1945. It is obvious that the consultation process and thereby the opportunity for residents and stakeholders to focus properly on responding to this Plan have inevitably been severely compromised.

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Paragraph Number	2.2
Policy Number	
Table Number	
Figure Number	
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Policies Map Reference	

**3a: Is the Plan sound? No**

**3b Justified**

There appears to be a considerable disconnection between the way that the Local Plan deals with its population projections and the volume of new house building set out in the Plan. Thus para.2.2 indicates Rutland had a population of 39,967 in 2017, projected to increase to 41,700 by the end of the Plan period in 2036. That is an additional 2033 residents. Meanwhile, Table 2

establishes a housing requirement of 2,942 new dwellings during the plan period. Even if the lower figure of 2,340, shown on Figure 2 is taken, this will equate to a much more significant increase in Rutland's population than is suggested by the population projection. Furthermore, these new housing numbers do not include the 650 units proposed at Stamford North which, however they are counted, will still be included as residents of Rutland!

As much of the assessment of all kinds of services and other provision, including health facilities, schools, leisure facilities, is based on a reasonable estimate of population projections, this is clearly an unsound basis upon which to base estimates of future provision,

**B4 Modification necessary**

Population projections for 2036 (and beyond) need to be revised to more accurately reflect the proposed scale of new build included in the Local Plan. Otherwise, it will give the impression Rutland's population growth is significantly less than this Plan is proposing and therefore will result in a shortfall in the provision of key services.

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Paragraph Number	4.1 – 4.13
Policy Number	SD1 and SD2
Table Number	
Figure Number	
Appendix	
Policies Map Reference	

*(Sustainable Development)*

**2a. Do you consider the Pre-Submission Local Plan to be legally compliant?**

Yes

No

**The Spatial Strategy proposed** is not consistent with national policy as it does not achieve the aims of sustainable development. This chosen strategy is reliant upon the delivery of a significant level of growth at a single location – namely SGB. This is removed from where the vast majority of housing and employment needs of the County are derived.

Other Local Centres, is likely to be significantly disadvantaged as a direct result of this approach, which will have the effect of re-prioritising essential investment and funding, particularly strategic infrastructure funding, away from existing towns and larger villages where most people continue to live and work. It is also going to concentrate affordable housing in one location some distance away from the existing settlements where people in housing need currently live. Indeed, National Planning Policy places great importance not only on ensuring there is a sufficient amount of land to meet housing needs, but that it should be located where it is needed. (NPPF para.59).



Authority (TCPA) indicated the importance of the challenge of sustainability facing such small garden communities by noting that *‘The inclusion of support for smaller ‘garden villages’ raises an important issue of scale – particularly the need to ensure that, like the original ‘garden villages’ New Earswick and Bournville, similar communities have the right facilities and jobs provision and genuinely affordable homes and so will not be merely ‘bolt-on’ housing estates using the garden tag.’*

So, at the SGB there is no secondary school proposed and the development is not of sufficient scale to cater for one. There is also continuing uncertainty about whether a GP surgery would be provided at this location and, furthermore, if it were to be, would it just displace one from elsewhere in this part of the county. Many residents north of Rutland Water, for example: travel to Empingham for their surgery and would be even further disadvantaged if this were to be replaced by a facility at the SGB location. The infrastructure Delivery Plan for the SGB location does not include a clear view on health service provision, acknowledging that there would still be discussion required with the local Clinical Commissioning Group. A further example of how numbers of initial promises have gradually been eroded, reflecting both the uncertainty around delivery and the unsustainable location.

**B4 Modification necessary**

The spatial strategy, as set out in Policy SD2, needs to be revisited completely in the light of the changed circumstances we are now in. The 2017 allocation is itself now some years out of date and there are significant challenges around the 2020 proposals, not least the viability and practicality of the SGB and the principle of establishing a new settlement as a focus for development in Rutland – a decision and commitment with implications well beyond 2036.

Furthermore the impact of the Covid-19 Pandemic on how we live in the future and what long term changes this could bring to our lifestyles are, if nothing else, far from certain. Accordingly, the only sensible modification would be a pause to allow some of these uncertainties to be clarified and better understood and for a new dialogue to open up between the LPA and residents/stakeholders about what is best for the future of Rutland to 2036 and beyond.

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Paragraph Number	5.10-5.20
Policy Number	SD2, H2
Table Number	
Figure Number	64
Appendix	
Policies Map Reference	

*(The location of development)*

**3a Is the Local Plan sound: No**

**3b Positively Prepared: Justified; Consistent with national policy**

In considering the appropriate location for development, a Local Planning Authority (LPA) has the responsibility to consider the range of reasonable alternatives available. It is considered this was not done properly in changing from a dispersed pattern of settlement, as set out in the 2017 Reg. 18 Plan to one focused on a new settlement at the SGB site. **From the outset, the selection of SGB for significant development was chosen in advance of the evidence, rather than emerging from the careful consideration of reasonable alternatives.** This can be shown by referring to the following. Firstly, RCC and the Ministry of Defence (MoD) signed a memorandum of understanding (MOU) committing the Council to promote the development of the SGB site. Secondly, the Development Plan document, published in July 2018 for public consultation, which sets out the changes to the spatial strategy focusing development at the SGB was not accompanied by a Sustainability Appraisal at that time. This should have been included, showing that the SGB passed the tests of being a sustainable location – it is supposed to be an iterative process that should inform plan-making – not just be an add-on afterwards. As National Planning Policy Framework (NPPF) establishes, evidence should not be produced retrospectively. In contrast, the 2017 Reg. 18 Local Plan was supported by a Sustainability Appraisal that had been properly produced following the correct legal procedures.

The NPPF states, in para.16, that a strategy has to be ‘shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.’ Clearly, the current proposed strategy has not evolved in this way, either in the way that SGB has been approached or decisions about the location of development throughout Rutland and its impact particularly on the market towns and the larger villages. The vast scale of opposition to the July 2018 consultation documents confirms that RCC changed its spatial strategy without engaging the support of local communities. It was plan-making from ‘above’ imposed on the people of Rutland, totally contrary to national policy as set out in NPPF para. 72.

This chosen spatial strategy is not appropriate for Rutland in the light of other reasonable alternatives, such as ensuring that the benefits of proportionate growth and investment are spread more evenly across the county. Focussing this more towards the larger settlements of the towns and local centres would be more sustainable, effective and consistent with national policy. Local Service Centres require that an appropriate level of growth and thereby development necessary to sustain their role within the RCC settlement hierarchy as a Local Service Centre. This proposed pattern of investment would clearly put this at risk. The Sustainability Appraisal reinforces this point. Instead, the current strategy has chosen to place a considerable emphasis on a location that is not accessible; is away from where identified needs are currently located; and doesn’t support the viability or the economy of existing town centres and the larger villages.

#### **B4 Modification required**

This Spatial Strategy is not sustainable and doesn’t work in the interests of Rutland as a whole. Simply returning to the proposals set out in July 2017 would not work as circumstances have changed. The modifications required cannot be achieved without either removing reference to a new settlement from the Local Plan – or more likely would entail a new Reg. 18 Consultation Plan to be prepared, built around more effective local community participation.

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Paragraph Number	4.8 - 4.9
Policy Number	SD2
Table Number	
Figure Number	64
Appendix	
Policies Map Reference	

*(The Woolfox Proposal)*

**3a Is the Local Plan Sound? No**

**3b Positively prepared; Justified; Consistent with National Policy**

It is not only what is in the Local Plan that is a test of its soundness, but what impacts can follow as a result of it. The 2017 Local Plan document did not include a provision for a new settlement in Rutland. Accordingly, the consultation responses to this Plan did not include any responses promoting such a settlement. The July 2018 document promoting, as it did the proposed new settlement at the SGB, opened the door to other interested parties seeking a similar approach. At the very end of the consultation period, in September 2018, a land-owner/developer-led proposal on the east side of the A1 at Woolfox, to the south of Stretton village, emerged. It too is based on a former RAF air-field, although one that physically has been gradually absorbed back in to the countryside. The proposal is for a mixed use settlement of up to 10,000 new dwellings, together with employment, leisure, education and other ancillary uses, together with supporting infrastructure. It is clear that it will be promoted as a location which can meet all the requirements of the SGB, but due to its scale could be more viable as a self-contained community and therefore more sustainable.

The proposal at Woolfox itself gets little mention (or indeed no mention) within the Reg. 19 document itself. It does, however, appear in a number of the background documents, including PTPP Planning consultancy's report on the 'Assessment of Strategic Develop at SGB and Woolfox'. It is difficult to mount directly an objection based on legality or soundness against this proposal, as it is neither promoted by nor included in the plan. However, it is clearly an issue that is almost certainly to be subject of a response to the Plan, promoting it (and directly comparing it to the SGB). This in turn will be subject to due consideration by the Independent Inspector at the EiP.

It can, of course, not be definitively proven, but it is reasonable to suggest that this proposal has, in all likelihood, only been brought forward as a direct result of the door being opened by RCC promoting and including the SGB as a new settlement at the heart of its changed spatial strategy to deliver housing growth up to 2036. The fact that Woolfox was not raised by its land owner/developer as a response to the 2017 consultation, but only after the SGB was introduced in 2018, is clear evidence that this is the case.

So the Reg.19 Plan is unsound in that it has never produced a satisfactory set of planning reasons or a rationale (as opposed to just meeting a landowner's – the MoD – aspirations) for the adoption of the idea of concentrating development in a new settlement. Furthermore, it has therefore never offered any justification or evidence that other locations and alternatives were given even the slightest due consideration. This is not surprising in that, when the Reg.18 Plan

was produced, it was clear that a new settlement in Rutland was not under active consideration. Once it became an option, however, more thorough consideration of alternatives should have been assessed and evaluated. This could have meant that Woolfox would not have emerged. At the very least, it would have provided a clear and open set of sound planning reasons for selecting a specific location for a new settlement. The only direct comparison was done after the event when, not surprisingly, the SGB location ‘won’ on virtually every criteria. Interestingly, this work did not include comparing them both to not including a new settlement at all.

This has left north-east Rutland in particular, facing up to a development on its door-step of 10,000 new residential units and other associated land-uses (to give a sense of scale this is compared to just under 17,000 households in whole of Rutland – (2016 figures;). This far exceeds Rutland’s requirements and is a further example of how Rutland is in danger of becoming significantly over-developed.

**B4 Modification proposed**

Woolfox, as with SGB, concentrates development in the countryside away from the traditional settlement centres in Rutland. As such they will leach potential investment opportunities away from where residents currently live and risk the future, in particular of Oakham, Uppingham and the Local Centres. Woolfox, in particular, goes further in that it would not just be displacing future activity from elsewhere in the county, but would attract a scale of development closer to a new town the size of Stamford – there can be no sound or legal reason why this proposal should be considered sound, acceptable or in any way in line with national planning policy.

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Paragraph Number	<b>5.1 – 5.14</b>
Policy Number	<b>H1</b>
Table Number	<b>1 and 2</b>
Figure Number	
Appendix	
Policies Map Reference	

*(Housing Supply/OAN)*

**B3 Is the Local Plan Sound? No**

**B3a Positively prepared: Justified; Effective**

It is accepted that it is good practice to have a buffer identified following a local plan housing allocation calculation. This is deemed particularly important in areas which consistently fall short in delivering their agreed housing numbers, something which has not been an issue for Rutland. Nevertheless, whilst a having a buffer is acceptable practice, the 25% buffer over and above that calculated using the nationally determined methodology is not justified. It is very likely to result in unnecessary levels of environment and social damage and runs contrary to national sustainable development policy. It also will result in potential over-development of Rutland as a whole and at the same time artificially inflates the scale of housing need in Rutland.

The OAN (independent needs assessment) for Rutland identifies 127 dwellings a year for Rutland, whereas RCC propose 160 per annum. It has also to be noted that this plan severely underplays the role played by windfall sites. The Council's own study in 2017 suggested a conservative estimate of 34 dwellings per year. The Local Plan however includes only 20 dwellings per year without any explanation. In reality, actual windfall numbers for the last few years have been about 50 dwellings per annum.

The figures of 127 identified as Rutland's OAN produces a requirement over the next 15 years to (2021 -2036) of 1905 units. If windfalls were assessed at a reasonable number, reflecting historic levels over the last 10 years, of 50 per year that equates to 750 which if the 650 units at Stamford North are included also only leaves a requirement of around 600 throughout Rutland. This can be accommodated comfortably, as Table 2 shows in Oakham (382 additional capacity), Uppingham (200) and the Local Service Centres (249). Neither SGB nor Woolfox is required to meet Rutland's needs and certainly at nothing like the scale proposed. Rutland is facing a potentially massive over supply of housing relative to its needs.

**B4 Modification proposed**

The Local Plan is currently including a very large and unrealistic buffer, which should be more like 10%. Windfalls need to be set at a level reflecting recent historic levels and with other changes, such as including the Stamford North figures in Rutland, will mean there is no justification for the new settlements as RCC and others are promoting.

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Paragraph Number	5.21 – 5.26
Policy Number	H4
Table Number	1 and 2
Figure Number	48
Appendix	
Policies Map Reference	

*(Stamford North – Quarry Farm)*

**B3 Is the Local Plan Sound? No**

**B3a Positively Prepared; Justified; consistent with national policy**

In our Parish Council response to the 2017 Plan we drew attention to what looked at that stage a strange anomaly of land in Rutland (at Quarry Farm, North Stamford) not counting to housing numbers in Rutland, but counting towards those of neighbouring South Kesteven DC. We referred to it again, and more strongly, in our response to Table 1 of the 2018 Development Plan document.

This has been given considerably more emphasis in the current plan where there is a detailed policy relating to the Stamford North development. There is what looks like a deliberate attempt

to confuse that which is currently enshrined in national planning guidance for the preparation of local plans, namely the duty to co-operate, with the 'gifting' of residential units to a neighbouring authority, which whilst not contrary to national policy guidelines is far from a requirement.

The duty to co-operate around developments close to local authority borders is well founded and happens anyway in practice, with or without national guidance. So RCC and SKDC working closely together on a development north of Stamford is good planning practice. It should also be born in mind that, contrary to some views that have been expressed, the Rutland element is something of an add on – this is clearly not the position. The existing infrastructure, particularly roads, cannot adequately support the Stamford part of the development. A new relief road is required. However, to generate sufficient development potential to make the infrastructure viable requires the 650 units proposed in Rutland also. Hence the Rutland element of the scheme provides the critical mass that makes it viable and means the Rutland element is integral to the implementation of the whole development.

Gifting of housing numbers in this case is based on a flawed set of premises. SKDC is physically 2.5 times larger in area than Rutland and already has, as evidenced through its EiP, sufficient housing land to meet its needs, including an 18% buffer and without requiring of 650 units gifted to it. Furthermore, the duty to co-operate, set out in para. 27 of the NPPF, requires policy making bodies to prepare and maintain one or more Statements of Common Ground (SoCG) documenting the cross-boundary matters being addressed. These should be made publicly available throughout the plan-making process to provide transparency. This hasn't happened in this case. SKDC considered a draft which has never been put to RCC.

Thus by gifting these numbers to a neighbouring authority that doesn't require them, RCC is going well beyond national policy as set out in the NPPF. It is unnecessary and therefore unsound. Moreover, it raises the question of what made RCC decide to do this? Certainly there are minuted meetings from SKDC that indicate their councillors were very surprised that it has happened. Disguising housing built in Rutland in this way is of no help to Rutland residents. If anything, it does the opposite. It also contributes to the overwhelming evidence that RCC, through this Plan, is seeking to dampen the numbers generally available in Rutland to make, in particular, the SGB proposal look both more necessary and viable than in reality it is.

**B4                    Modification needed**

The 650 units gifted to SKDC should be rescinded and a corresponding reduction in numbers elsewhere identified.

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Paragraph Number	5.44 – 5.52
Policy Number	H9
Table Number	1 and 2
Figure Number	48
Appendix	
Policies Map Reference	

*(Affordable Housing)*

**B3a Is the Local Plan Sound? No**

**3b Justified; Effective; consistent with national policy**

The Local Plan sets out clearly a requirement for affordable housing, showing how the Strategic Housing Market Assessment Update (SHMA) 2019 for Rutland. Policy H9 establishes that 305 of new housing provision should be affordable, across the categories of affordable housing set out in para. 5.45.

It is also clear that this is a requirement aimed at meeting a need across all the settlements in Rutland. By definition, however, it is only the larger schemes that can be required to provide affordable housing on site. Otherwise, if provision is insisted to be on small sites, it becomes relatively straightforward for a developer to show it challenging a scheme's viability. In Rutland schemes of 10 and above require this to be on site and for 6-9 units a commuted sum would be payable. The Plan also quotes that, on schemes of over 10 units, 30% of the provision should be affordable. Inevitably this would mean that, under the current proposed plan, with so much of the new development identified for SGB, that a disproportionate amount of the affordable housing in Rutland will also be here, away from the other places that need it.

There has to be an issue of soundness here and it is also questionable whether national policy has been fully followed. This plan is contradictory. Policy H9 is clear in endorsing national policy (NPPF – para 62) that affordable housing should be made available on site wherever possible. This is consistent with the idea that affordable housing is required in settlements across Rutland. It then indicates this will be harder on small sites, seemingly allowing those smaller than 10 to either escape this commitment entirely or for developments of 6-9 units to pay a commuted sum. This, allied to concentrating so many of the bigger sites in one location, will result in residents who need and qualify for affordable housing finding insufficient provision where it is most required.

In a sustainable, more dispersed, development pattern a spread of affordable housing can be achieved. This is critically important as, almost by definition, people, requiring affordable housing are, for a variety of reasons, more likely to need housing close to where they work, access schools and health facilities and shop. They are also likely to be more reliant on public transport. Now, with such a large proportion of the housing in larger sites being concentrated at SGB, it will mean that many of those least able economically to and/or physically to travel will have to, as the link between affordable housing being located in the places where it is most needed has been lost.

Also note that there is an assumption that all affordable housing has (where rented) to be 'Affordable Rented' rather than 'Social Rented'. Normally you would expect mix of the two. Usually Affordable Rented generates higher values than the Socially Rented, so if the assumption is viewed as unreasonable (i.e. that some social rented should be included) this is likely to result in a more optimistic assessment of development viability, particularly on the larger sites.

**B4 Modification necessary**

Affordable housing aspirations are to be welcomed, but they need to be provided right across the county, as people with an affordable housing requirement live in settlements across the whole spatial hierarchy. The concentration of so many of the larger development sites, up to 2036, at one location, SGB, means that affordable housing too is going to be over-concentrated and skewing its availability for against those living elsewhere in Rutland, where the need is just as significant.

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Paragraph Number	6.19 – 6.32
Policy Number	E5, E6
Table Number	
Figure Number	2
Appendix	
Policies Map Reference	

*(Impacts on Rutland Water)*

**3a Is the Local Plan sound: No**

**3b Justified: Effective**

There is much to be commended within the Plan in its treatment of Rutland Water. It is clearly recognisable as 'the jewel in Rutland's crown'. Having accepted that, however, there are some concerns that the plan is not addressing effectively enough. Furthermore, aspects of the Plan, and particularly the new proposed spatial strategy, seem to us to have likely harmful effects on it as a Site of Special Scientific Importance, on its ecology and high environmental quality, as well as its role as a very important leisure and recreational destination.

Figure 2 encapsulates where Rutland sits in sub-regional terms, showing the very significant planned new housing additions in all the surrounding counties, totalling to nearly 98,000 new dwellings, with a projected estimate of over 391,000 new residents. It is highly likely that Rutland Water will come under considerable pressure, as it is already one of the key leisure destinations in the East Midlands. Policy E5 seeks to welcome sustainable tourism, noting the important value to the economy. Whilst quoting the importance of such tourism development being of an appropriate scale, it does not seem to have paid sufficient attention to the pressures on it that are likely to arise from this level of growth in the surrounding counties. The position is

further exacerbated by the proposals at SGB, which are promoting a large new settlement, parts of which are within the Rutland Water Area and the rest of it is in very close proximity to it.

Thus, on the one hand, Policy E6 is setting out a clear regime for protecting and enhancing the future of Rutland Water. It cites the importance of development being ‘carefully located’ and the limited to small-scale (within the Recreation areas). Yet, on the other hand and almost as if this is consistent with these policies, the plan’s sub-regional context is given little regard and RCC’s own policies will make delivering E6 aspirations increasingly challenging and thus the plan is not sound on this point.

We also note the important emphasis given to all aspects of the environment and particularly how they impact on Rutland Water. Rutland continues to be one of the least wooded parts of the country and it would make considerable sense for the Local Plan to be seen to promote planting trees to a greater degree than it does.

**B4 Modifications necessary?**

More emphasis on how the potential enhanced negative impacts of future development in the sub-region can be mitigated, particularly as they relate to Rutland Water.

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Paragraph Number	<b>8.5 – 8.17</b>
Policy Number	<b>SC2</b>
Table Number	
Figure Number	2
Appendix	
Policies Map Reference	

*(Sustainable Transport)*

**3a Is the Local Plan sound? No**

**3b Positively prepared? Justified.**

Para.8.7 makes clear the aim to reduce the use of the car throughout the plan period. It emphasises the importance, therefore, of ensuring new development is located in the most accessible places. It further notes, in paragraphs 8.12 & 8.13, the importance of supporting public transport and of working with Network Rail and the Department of Transport to improve passenger and rail provision. This position is reflected in Policy SC2 ‘Securing Sustainable Transport’.

However, there are inconsistencies and missed opportunities here and the plan could clearly go further. First, the soundness of the Plan has to be challenged, given that these laudable objectives to deliver sustainable transport are undermined and compromised by locating a significant proportion of the new development, up to 2036, in locations which cannot be considered sustainable and thereby put at risk achieving these sustainable transport priorities.

We also note that, whilst there is a commitment to integrating walking and cycling (SC2 #7), there is no similar commitment to integrating also the different elements of public transport. Thus some of the bus services that are important in linking the villages to Oakham do not go near to the railway station – something the plan should address and clearly is an opportunity that is being missed.

**B4                    Modification considered necessary:**

There is a need to address the inconsistencies that arise from locating much of the future development of Rutland in locations that will challenge the ability to deliver more sustainable transport. Also to set out more aspirations for a more integrated and thereby more efficient public transport system. This in turn is likely to result in more take up and use of the public transport system in Rutland.

Name:                Andrew Johnson

Signature:

A handwritten signature in blue ink that reads "Andrew Johnson". The signature is written in a cursive style with a long horizontal stroke at the end.

Print name:        ANDREW JOHNSON

**Chairman:        Morcott Parish Council**