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A specialist team within DLP Planning Ltd

For and on behalf of
Stancliffe Homes Limited

Pre-submission draft Local Plan Consultation (Regulation 19)

Land at College Close, Great Casterton

Prepared by
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1.0 INTRODUCTION

- 1.1 This Representations Report has been prepared on behalf of Stancliffe Homes Limited and provides our client's response to the consultation on the new Rutland Local Plan – Pre-submission draft Local Plan Consultation (Regulation 19).
- 1.2 This representation highlights specific shortcomings in the Regulation 19 Plan which we consider need to be addressed for the plan to be found sound. The conclusion of this review is that the plan will need to make provision for a significantly higher level of housing provision in order to address past low build rates and to support the Council's economic strategy.
- 1.3 We also note that the consultation of the new NPPF and proposed changes to the standard method for calculating housing need has taken place prior to the Regulation 19 consultation. We are conscious this is likely to having significant implications for the Rutland Land Plan and the policies within it, as mentioned in the draft plan foreword by the Leader of the Council.
- 1.4 As part of the solution for addressing these issues and ensuring the plan is sound, it is suggested that the Council consider the allocation of Land at College Close Great Casterton for approximately 41 dwellings.
- 1.5 The site comprises approximately 2.61ha of Grade 3b agricultural land. The site is located to the north of College Close and to the east of Pickworth Road, at the edge of the settlement of Great Casterton. Figure 1 shows the site location.
- 1.6 The site is surrounded by residential dwellinghouses located to the south on College Close and to the west, on Pickworth Road. To the east is a school playing field and there are agricultural fields to the north of the site.

Figure 1. Site Location Plan



- 1.7 The site does not fall within the Green Belt, Conservation Area, or an Area of Outstanding Natural Beauty. It is within Flood Zone 1 and is not designated as land of special interest on the Council's interactive policy map.
- 1.8 Great Casterton is a Larger Village within the Council's settlement hierarchy in the emerging Regulation 19 Plan. The village has developed following an initial Roman fort settlement and is located approximately 3 miles north of Stamford.
- 1.9 Great Casterton has approximately 600 residents with access to a series of amenities located within the settlement itself including both a Primary School and Secondary School. The site is within walking distance of a number of shops, Stamford Garden Centre, a public house, and other businesses.

Figure 2. Aerial View of the Site and Surrounding Area



- 1.10 The site is subject to a current planning application (see Ref 2024/1311/MAF). The application is seeking full planning permission for up to 41 dwellings, via a single proposed vehicular access points off College Close, Great Casterton.
- 1.11 The proposal includes the provision of bungalows and much needed affordable housing.

2.0 FOREWORD TO REGULATION 19 RUTLAND LOCAL PLAN

2.1 Within the foreword of the Regulation 19 draft plan it states the following:

“In my introduction to the Regulation 18 Local Plan consultation, I said that a Local Plan must satisfy the requirements of the National Planning Policy Framework (NPPF). The new Government has announced a consultation period on changes to planning regulation and the NPPF. RCC is far enough advanced in producing a Local Plan that a new NPPF and accompanying regulation won’t immediately affect us. However, as soon as we adopt this Local Plan we will have to start a review of the plan in order to become compliant with new regulations, including setting a new, and early indications suggest, a much higher housing target.”

2.2 We strongly object to this approach to review the Plan post adoption. The Plan is yet to be adopted and is still undergoing consultation, therefore in order to ensure that the plan is positively prepared it should seek to address these issues (including the critical issue of meeting local housing need) now not via a Plan review. The statement clearly recognises a need to ensure the delivery of additional housing to meet needs, but appears to have no intention of addressing this matter in an appropriately plan led approach. This is a political decision as opposed to an objective planning approach.

2.3 Furthermore, we note that the ‘Building the homes we need’ Written Ministerial Statement (Angela Raynor - 30th July 2024) highlights the importance of every local authority having a development plan in place, and to only allow them to continue to examination where there is not a significant gap between the Plan and the new local housing need figure. In light of this, we believe there is a significant gap between Plan and the new local housing need figure and so this should be addressed now not post adoption.

3.0 CHAPTER 5 – SPATIAL STRATEGY POLICY SS1

3.1 Policy SS1 relates to the spatial strategy for new development. The points highlighted below build on our previously submitted Regulation 18 representations.

Start date of the plan period

3.2 A 20-year period is supported.

3.3 A 20-year period with a start date at 2021 (until 2041) means that the plan will need to be adopted by May 2026.

3.4 The Rutland Local Development Scheme 2022-2025 (October 2024) sets out the programme for the adoption of the local plan by May 2026.

3.5 This programme (appendix 1) provides little flexibility should there be any delay in the next stages of the local plan.

3.6 The programme assumes the Regulation 19 consultation should have begun in September 2024.

3.7 The plan process is already running 1 month late as per the latest LDS document.

3.8 Our extensive experience of the local plan process suggests that the programme is over ambitious and allows for no unforeseen delays and requires that time be made up during the most intense part of the plan making.

3.9 The plan on the date of adoption should make provision for a full 15 years of housing land, as per NPPF paragraph 22 which states 'strategic policies should look ahead over a minimum of a 15 year period from adoption'. This can be achieved either by extending the plan period to 2043; or by updating the start of the plan period to 2023 (for which data is available), with the same consequential effect that the plan runs to 2043 rather than 2041.

3.10 We therefore object to Policy SS1 on the grounds it is not positively prepared. In order to ensure the plan is sound we recommend that the Council do the following:

a) Change the start of the plan period to 2023, maintain a 20 year plan period so the end date of the plan is 2043; or

b) Extend the plan period to 23 years so the end date of plan is 2043

Level of dwelling proposed at least 123 dwellings per annum.

3.11 The proposed level of housing of at least 123 dwellings per annum is too low as this is below the proposed new standard method local housing need figure. Whilst we agree with the hierarchy of development as outlined in Policy SS1 we have significant concerns regarding the housing numbers planned.

3.12 We also have concerns regarding the reliance on windfall sites. We do not determine the evidence, as outlined in the Small Sites Windfall Housing Study 2022, to be robust as there is no guarantee that this level of windfall will come forward. In order to ensure that the Plan is positively prepared it should allocate further sites to meet its true housing need. A key issue is that small sites are extremely difficult to realise without securing an implementable planning permission. However, securing a planning permission is extremely difficult if the site is not allocated. As such, the Plan should allocate further sites, including small sites, to reduce the reliance on unpredictable windfall opportunities.

- 3.13 Paragraph 61 of the NPPF 2023 correctly identifies that the standard method is to be used to set the minimum number of houses needed.
- 3.14 Housing Market Assessment Final Report August 2023 states:
“Paragraph 2a-010 also sets out circumstances where it might be appropriate to plan for a higher housing need figure than the standard method indicates; this includes noting that the method ‘does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates’. In Rutland, economic growth potential (increases in jobs) could put pressure on the need to provide housing delivery in excess of the Standard Method, and this is discussed later in this report.”
- 3.15 However, the new proposed standard method sets the baseline for growth in Rutland to be 264 dwellings per annum. Thus, this shows that the 123 dwelling figure is far too low. This means that the new Local Plan does not even plan for the baseline level of need. **As a result of this we have serious concerns about the level of unmet housing need in Rutland and therefore the emerging plan is deemed unsound.**

Past levels of completions

- 3.16 It is noted that PPG Paragraph: 010 Reference ID: 2a-010-20201216 states:
“There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method.”
- 3.17 In terms of considering these criteria the HMA 2023 states:
“The figure below shows housing completions over the period from 2011 to 2022 – this shows average completions of 184 per annum over the past decade and a slightly lower figure of 172 per annum over the past 5-years. Generally, these figures would point to a housing need in excess of the Standard Method (123 per annum) – supply has almost consistently exceeded the Standard Method although figures for the last two-years do show a slowing down in completions (to a level below the Standard Method).”
- 3.18 The fact that the past level of completions is substantially higher than the minimum level suggested by the standard method is a strong indication that the plan should provide for a level of housing provision above the minimum level suggested by the standard method.
- 3.19 A higher level of provision would be in full accordance with the policy in the PPG which specifically states that such higher rates are a reason for planning to accommodate more than the minimum level of housing.
- 3.20 While there has been a slowing down of completions in the period 2020 to 2022 this was during a period when the Council could not demonstrate a five-year land supply. It is also due to the fact that the extant plans are now considerably out of date, reducing the supply of allocated sites.
- 3.21 The number of recent appeals that have been pursued by housebuilders is a clear indication that the need for housing has not been fulfilled.

Recent population and household projections

- 3.22 HMA Figure 3.7 (Projected population growth (2023-33) – Rutland – range of SNPP releases) highlights that the principal 2018 based subnational population projection was considerably

higher at 7% compared to the 2014 based projection that is used as an input to the standard method – which was just 3.8%. While this is not in itself justification to move away from the Standard Method it nevertheless adds additional weight to the proposition that the plan should make provision for more than simply the minimum level of provision proposed by the Standard Method.

3.23 HMA Figure 3.8 (Projected household growth (2023-33) – Rutland – range of SNHP releases) also highlights that the principal 2018 based population projection was considerably higher at 9% compared to the 2014 based projection that is used as an input to the Standard Method which is just 5.7%. While this is not in itself justification to move away from the Standard Method it nevertheless adds additional weight to the proposition that the plan should make provision for more than simply the minimum level of provision proposed by the Standard Method.

3.24 The HMA states:

“3.37 Although this report is not proposing to take any of these figures forward as an estimate of need (due to the wording of the PPG) it does seem clear that more recent population and household projection releases do point to stronger growth.”

3.25 The HMA undertakes a remodelling of migration, population and household formation and concludes:

“ The range of household growth shown based on the preferred population projection (5-year MYE) is in the range of 124 to 167 per annum – this is data also using the most up-to-date information about household numbers and representative rates.”

3.26 This highlights that the Regulation 19 Plan as drafted is really proposing to meet the very minimum requirement of likely future need. It is noted that using the higher household formation rates from the 2014 projections would require a level of dwelling provision of 180 dpa closely matching the average over the last decade.

Relationship Between Housing and Economic Growth

3.27 It should be noted that this assessment is based on the presumption that an increased number of people will have to work in their old age (as demonstrated by HMA Figure 3.19). If this does not occur or occurs at a lower level than assumed in this model, then there will be a need to increase the workforce via increased migration.

3.28 Paragraph 3.73 of the HMA estimates that over 1,700 additional jobs could be supported by the changes to the resident labour supply.

3.29 Figure 3.23 of the HMA highlights that the job growth forecasts being used as an input to the employment land element of the local plan suggest a higher range of job growth than that supported by the proposed level of housing. This is between 1,842 and 2,863 jobs.

3.30 In terms of the number of dwellings that might to be provided to support future job growth, Figure 3.25 which suggests a range of between 116 and 149 dpa to meet the two economic projections is based on the negative trends in household formation (the Household Representative Rate) between 2011 and 2021 continuing over the next 20 years of the plan. Such an approach models forward the negative impacts of the housing crisis and is not considered to be appropriate.

3.31 If the Household Representative Rate is maintained at the 2021 rate rather than decreased in accordance with the 2011 to 2021 trend, then the need for dwellings to support future job growth is increased and Figure 3.26 suggests a range of between 163 and 197 dpa to meet the two economic projections. This approach which does not model forward the negative

impacts of the housing crisis and is considered to be the more appropriate.

The conclusion of the HMA

3.32 The HMA concludes:

*“Net completions have averaged 184 per annum over the past decade whilst it is estimated that a trend-based projection could support around over 1,700 additional jobs (through growth in the resident labour supply) in the 2021-41 period – the emerging employment land review shows a baseline job forecast of around 1,800 additional jobs in the same period. **Both of these findings arguably point to a housing need in excess of the Standard Method, but it is not possible to pin a specific number down.** The ELR does also include a higher job forecast, which could point to higher housing need; this however might be considered as a ‘policy-on’ position.*

Overall, taking all of the evidence in the round, it is concluded the Standard Method housing need should be considered by the Council as very much a minimum figure with a range of different projections typically (but not universally) pointing to a higher figure. The Council should therefore consider if it is reasonable and possible to exceed the Standard Method, in doing so consideration will need to be given to factors other than just need (such as relating to land supply and infrastructure requirements).”

Conclusion on the level of housing to be provided for in the local plan.

3.33 The NPPF and PPG are very clear that the Standard Method advises as to the minimum figure to be accommodated in a Local Plan and that planning for a level of housing provision above this is encouraged, especially if supported by past rates of deliver and/or the need to support economic growth. The evidence base is clear that both these reasons strongly support making provision for a higher level of housing provision than the minimum advised by the Standard Method.

3.34 Furthermore, the proposed new standard method would lead to further implications for this emerging Plan as that would mean an increase of 114% more dwellings would be required (264 dwellings per annum). This is alluded to in the Regulation 19 Foreword.

3.35 We therefore object to Policy SS1 on the grounds it is not positively prepared. In order to ensure the plan is sound we recommend that the Council do the following:

a) In full accordance with the PPG it is recommended that the housing requirement is increased to the average rate of 185 dpa.

3.36 We are confident that these issues can be addressed now, not via a later Plan review.

Inconsistency between Policy SS1 and Policy E1

3.37 Policy SS1 states that about 16 ha of land will be identified for new employment generating uses, (with the aim of generating additional jobs) over the plan period 2021-2041 to address the objectives of the Economic Strategy.

3.38 Policy E1 allocates a total of 26.4 ha of employment land.

3.39 There is a significant mismatch between these two figures that needs to be resolved.

3.40 There is a further mismatch between both figures and the much lower level of employment growth that would be supported by the minimum level of housing provision proposed in Policy SS1.

- 3.41 We therefore object to Policy SS1 on the grounds it is not justified. In order to ensure the plan is sound we recommend that the Council do the following:
- a) Policy SS1 should be amended to reflect the level of employment land being proposed in Policy E1
 - b) As above, the level of housing should be increased to that which will support the level of employment growth that is being pursued. At a minimum this should be at least 185 dwellings per annum (dpa).

4.0 CHAPTER 6 - SITES PROPOSED FOR RESIDENTIAL DEVELOPMENT POLICY H1

- 4.1 The overall level of allocations is almost an exact match to the minimum level housing provision advised by the current Standard Method which is 2,706 (123 x 20 plus 10%).
- 4.2 However, as noted above, the Local Housing Need should be the minimum starting point for establishing a housing requirement. Therefore, the Council should consider if a need for a higher housing requirement is required. We strongly recommend that this number is increased.
- 4.3 In light of the compelling evidence above on past rates of completions and the impact of the Council's economic strategy the level of housing to be planned for should be substantially above the minimum requirement.
- 4.4 The total level of housing to be planned for should be amended as follows taking into account the recommended extended time period above:
- a) 185 dpa x 23 (to take the plan to 2043) plus 10%.
 - b) This results in a total housing requirement of 4,680 dwellings (203dpa)
- 4.5 Furthermore, we encourage the Council to reconsider the capacity assumptions of current allocations in light of the Biodiversity Net Gain requirement, which is likely to reduce the density and viability of sites. In light of this we believe additional housing sites should be allocated to ensure that the housing requirement is met in full.

Lack of trajectory

- 4.6 The Regulation 19 Plan does not contain a trajectory to demonstrate that the allocations will deliver in a timely manner to meet the level of housing required to support the Council's economic strategy.

The failure to consider suitable alternative sites in the background evidence: College Close, Great Casterton

- 4.7 This site is currently subject to a planning application that is pending consideration. It presently sits outside the Planned Limits of Development of the village of Great Casterton.
- 4.8 Great Casterton is one of the **Larger Villages** identified in the settlement hierarchy which is not identified to have any housing provision made over the period of the plan.
- 4.9 The site is part of a much more extensive area assessed in the "Landscape Sensitivity Part 2a" (GCA1) which includes all of the land to the north of the village of which the current application site represents a small parcel. It is, in any event, recorded as having a medium to low sensitivity to housing development. In summary this Report appears to support development in this more specific location stating:
- "any new housing development such as to the north of College Close should ensure that the existing positive soft entrance into Great Casterton from Ryhall is retained by avoiding the higher ground"*
- 4.10 This assessment is contradicted by the conclusion of the SHLAA (Reference: SHLAA GRT 04 Site ID23 page 139) which states:

"Conclusion: The site is adjacent the built up area of Great Casterton. The site is promoted for residential development with an indicative capacity of 77 dwellings. There are no significant constraints identified, although there is uncertainty regarding the availability of access, that could not be mitigated. However, given the scale of growth proposed and

sensitivity of the landscape, it is considered that a site of this size is not in keeping with the character of the existing settlement.”

- 4.11 The SHLAA's conclusion on landscape impact does not align with the findings of the landscape assessment which concluded development could be suitably accommodated on this site within certain parameters.
- 4.12 With regard to the scale of development, the SHLAA's conclusion is not based upon the scale proposed within the current full planning application, which is for 41 dwellings, open space and extensive landscaping. This scale of development allows for the mitigation required by the Council to overcome their landscape concerns. A development of 41 dwellings would be of a scale commensurate with other allocations being proposed for other Larger Villages.
- 4.13 Given the need to identify further housing allocations the Council should reconsider the allocation of this site which is suitable, available and deliverable.

5.0 CHAPTER 6 – MEETING ALL HOUSING NEEDS POLICY H4

5.1 Policy H4 is drafted as per the below:

Development proposals for sites of 10 or more dwellings should provide a range of house types, sizes, and tenures to meet the general and specialist needs for housing in Rutland in line with Table 4 below, as identified in the latest Housing Market Assessment or other up-to-date evidence of local housing need.

New housing proposals shall also:

- a. enable older people to promote, secure and sustain their independence in a home appropriate to their circumstances, through the provision of specialist housing (as defined in the Glossary) where needed across all tenures in sustainable locations. New housing proposals shall take account of meeting identified needs for a growing ageing population by providing appropriate accommodation, including extra care and other forms of supported housing; and*
- b. enable the provision of high-quality family housing that meets changing household needs and responds to market demand; and*
- c. enable the provision of high quality and affordable housing for all and accommodation that considers specialist needs and ensures that people can chose to live close to their families and work opportunities within the County; and*
- d. increase choice in the housing market, including new build private sector rented accommodation (Build to Rent) across both rural and urban parts of the County.*

5.2 We support the wording of Policy H4 as currently drafted.

6.0 CHAPTER 6 – AFFORDABLE HOUSING POLICY H7

- 6.1 We support the wording of Policy H7 as currently drafted. However, we stress the importance of addressing the ability to ensure delivery of affordable housing throughout the Local Plan area.
- 6.2 As outlined the Local Plan *Foreword*, Rutland suffers with issues of affordability due to its high proportion of large houses. The recognition of this policy failure as a result of multiple issues, should be addressed in the emerging Local Plan.
- 6.3 The planning application for 41 new homes at Greater Casterton helps address this issue as it provides bungalows and affordable houses (34%). Thus, we strongly recommend that this site is allocated for housing. This stance is further supported by the PPG stating that an increase in the total housing requirement may need to be considered where it could help to deliver the required number of affordable homes, and so this Plan should increase its housing requirement.

7.0 CHANGES TO THE PLANNED LIMITS OF DEVELOPMENT AT GREAT CASTERTON

- 7.1 The Regulation 19 Plan proposes to alter the Planned Limits of Development (PLD) at Great Casterton to include the school playing fields as illustrated in the comparison of the extant proposals map and the proposed below.
- 7.2 This change is supported in principle, but it is considered that this proposed alteration to the boundary highlights the fact that the current planning application site adjacent to the school and accessed from College Close, is enclosed on three sides by housing and now a potential development area within the planned Settlement Limit. This effectively renders the current planning application site little more than an infill development opportunity within the overall settlement context. Consequently, the development of the application site for housing appears to be entirely logical allocation especially as there are no other proposals for development within this Larger Village. As previously mentioned, other Larger Villages have defined housing allocations drafted within the emerging plan. As currently drawn, it appears to be illogical and ill thought out. This suggests political decision making as opposed to objective, sustainable and balanced decision making. Therefore the settlement boundaries should be reviewed and amended as per the below.
- 7.3 We therefore object to Policy SS1 on the grounds it is not justified and therefore unsound. In order to ensure the plan is sound we recommend that the Council do the following:
- Instead of the PLD boundary being amended to include the school it should be extended so as to include the site at College Close, Great Casterton (see Appendix 1)

Figure 3. Existing PLD at Great Casterton

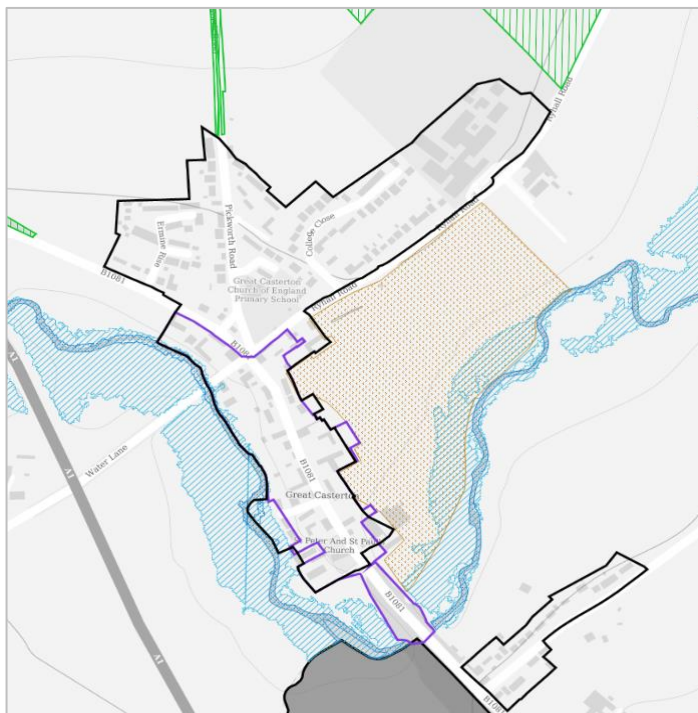
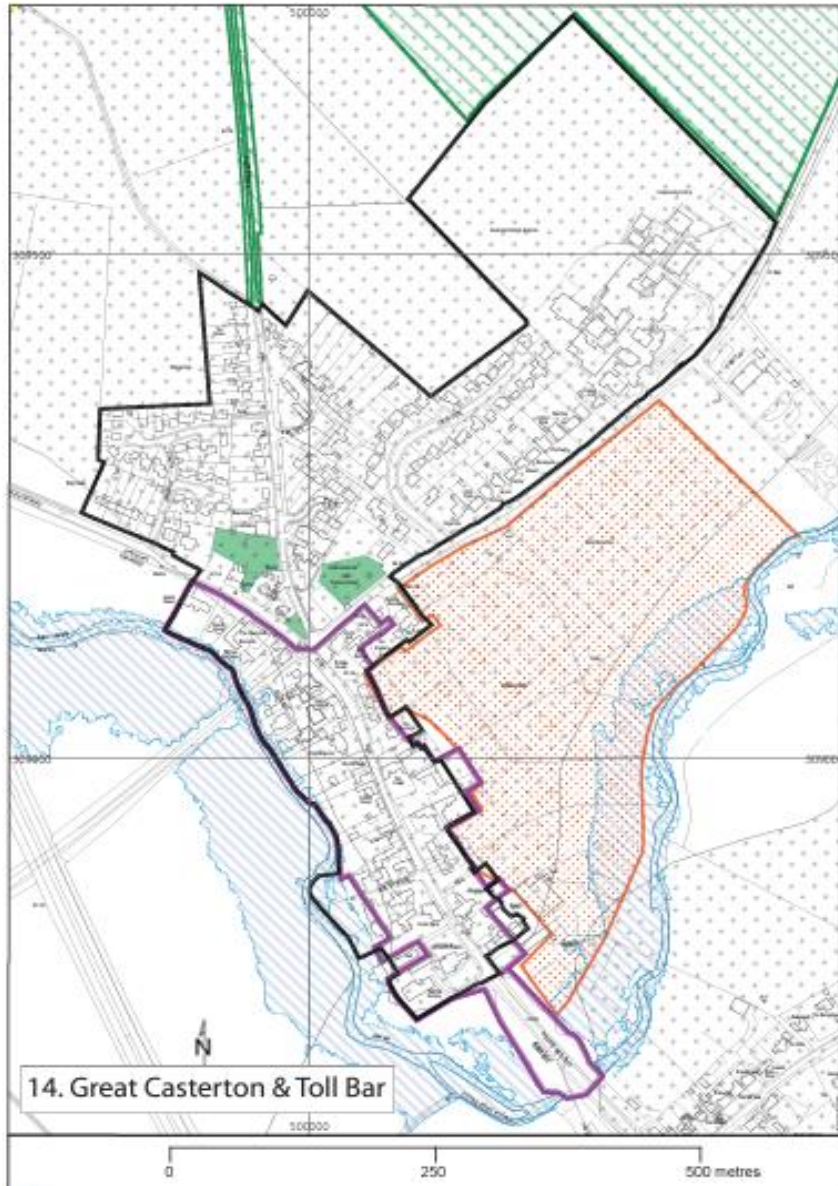


Figure 4. Proposed PLD including the School



APPENDIX 1 RECOMMENDED PLANNING LIMITS OF DEVELOPMENT CHANGE – GREAT CASTERTON

Additional land proposed to be included in the PDL for Great Casterton outlined in red.





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