

## RUTLAND REGULATION 19 LOCAL PLAN – REPRESENTATIONS BY DEFINE PLANNING AND DESIGN ON BEHALF OF MR PJSR HILL AND HIS FAMILY COMPANY PIKERACE

2<sup>nd</sup> December 2024

### 1. POLICY CC2 – DESIGN PRINCIPLES FOR ENERGY EFFICIENT BUILDINGS

#### QUESTION 1: SUPPORT OR OBJECT:

Object.

#### QUESTION 2: DO YOU CONSIDER THE PLAN IS:

- LEGALLY COMPLIANT? Yes.
- SOUND? No.
- COMPLIES WITH THE DUTY TO CO-OPERATE? Yes.

#### QUESTION 3: COMMENTS:

The general scope of Policy CC2, which expects new developments to meet “*the highest possible energy efficiency standards*” is appropriate.

However, to ensure that the policy is “*clearly written and unambiguous*” as required by paragraph 16d of the National Planning Policy Framework (NPPF), it should clarify that developments are expected to meet the highest standards, **subject to feasibility and viability**; so decision-makers will clearly understand the factors that define what is “*the highest possible*” standard.

#### QUESTION 4: PLEASE SET OUT THE MODIFICATION(S) YOU CONSIDER NECESSARY TO MAKE THE JOINT LOCAL PLAN LEGALLY COMPLIANT AND SOUND, IN RESPECT OF ANY LEGAL COMPLIANCE OR SOUNDNESS MATTERS YOU HAVE IDENTIFIED ABOVE:

To ensure that the policy is “*clearly written and unambiguous*” as required by paragraph 16d of the National Planning Policy Framework (NPPF), it should clarify that developments are expected to meet the highest standards, subject to feasibility and viability; so that decision-makers will clearly understand the factors that define what is “*the highest possible*” standard.

#### QUESTION 5: ATTACHMENTS

None.

#### QUESTION 6: IF YOUR REPRESENTATION IS SEEKING A MODIFICATION TO THE PLAN, DO YOU CONSIDER IT NECESSARY TO PARTICIPATE IN THE EXAMINATION HEARING SESSION(S)?

Mr PJSR Hill does not wish to attend the examination hearing sessions in relation to this policy / matter, but does wish to attend other sessions relating to the spatial strategy (Policy SS1), Future Opportunity Areas (Policy SS4), strategic employment land allocations (Policy E1), and the Woolfox Depot employment allocation (Policy E1.5).

## 2. POLICY CC4 – NET ZERO CARBON (OPERATIONAL)

### QUESTION 1: SUPPORT OR OBJECT:

Object.

### QUESTION 2: DO YOU CONSIDER THE PLAN IS:

- **LEGALLY COMPLIANT?** Yes.
- **SOUND?** No.
- **COMPLIES WITH THE DUTY TO CO-OPERATE?** Yes.

### QUESTION 3: COMMENTS:

The requirement of Policy CC4 for new developments to “*provide the maximum generation of renewable electricity as practically and viably possible on-site (and preferably on-plot)*” is appropriate in that it is sufficiently flexible in taking account of the feasibility and viability of renewable energy solutions.

However, it is noted that the policy name is referred to as “*net zero carbon (operational)*” which is not actually a requirement of Policy CC4. It is suggested, therefore, that the policy name changes to ensure that the policy as a whole is “*clearly written and unambiguous*” as required by NPPF paragraph 16d, and that the policy is applied consistently.

### QUESTION 4: PLEASE SET OUT THE MODIFICATION(S) YOU CONSIDER NECESSARY TO MAKE THE JOINT LOCAL PLAN LEGALLY COMPLIANT AND SOUND, IN RESPECT OF ANY LEGAL COMPLIANCE OR SOUNDNESS MATTERS YOU HAVE IDENTIFIED ABOVE:

It is noted that the policy name is referred to as “*net zero carbon (operational)*” which is not actually a requirement of Policy CC4. It is suggested, therefore, that the policy name changes to ensure that the policy as a whole is “*clearly written and unambiguous*” as required by NPPF paragraph 16d, and that the policy is applied consistently.

### QUESTION 5: ATTACHMENTS

None.

### QUESTION 6: IF YOUR REPRESENTATION IS SEEKING A MODIFICATION TO THE PLAN, DO YOU CONSIDER IT NECESSARY TO PARTICIPATE IN THE EXAMINATION HEARING SESSION(S)?

Mr PJSR Hill does not wish to attend the examination hearing sessions in relation to this policy / matter, but does wish to attend other sessions relating to the spatial strategy (Policy SS1), Future Opportunity Areas (Policy SS4), strategic employment land allocations (Policy E1), and the Woolfox Depot employment allocation (Policy E1.5).

### 3. POLICY SS1 – SPATIAL STRATEGY FOR NEW DEVELOPMENT

#### QUESTION 1: SUPPORT OR OBJECT:

Object.

#### QUESTION 2: DO YOU CONSIDER THE PLAN IS:

- **LEGALLY COMPLIANT?** Yes.
- **SOUND?** No.
- **COMPLIES WITH THE DUTY TO CO-OPERATE?** Yes.

#### QUESTION 3: COMMENTS:

This representation is submitted on behalf of Mr PJSR Hill and his family business Pikerace, who are the owners both of the Woolfox Future Opportunity Area (Policy SS4) and the proposed employment site at Woolfox Depot (proposed to be allocated by Policy E1.5). Therefore, Mr PJSR Hill and his family business are henceforth referred to as “the site owners” for the purposes of this comment.

The site owners support the preparation of the Rutland Local Plan (RLP) and Rutland County Council’s (RCC) intention to positively plan for its development needs in the period to 2041. As set out below, they support the general scope of the spatial strategy, as well as the sites that the RLP identifies to realise the spatial strategy, but considers that there should be some modifications to the plan to ensure that it meets the tests of soundness as set out in paragraph 35 of the National Planning Policy Framework (NPPF).

With regard to the delivery of employment uses within the County, the site owners welcome that RLP Policy SS1 refers to the employment requirement as a minimum figure. However, and as set out in response to Policy E1.5 there is an opportunity to facilitate a higher level of growth above 16ha to ensure that the full needs of the area will be met, and that the “roaming” demand for development along the A1 corridor is met. That should be reflected through a change to Policy SS1; in that it should make reference to the higher level of employment growth that should be delivered in the plan period.

In that context, the site owners also support the employment sites that the Regulation 19 RLP has identified to meet that employment requirement. Specifically, the owners support the identification of “Woolfox Depot” (site ref. E1.5) as a location for employment development. Their comments in response to Policy E1.5 set out that the allocation boundary should, however, be extended in reflection of the need and demand for employment uses in this particular location and the practicalities of delivering them. The comments also highlight that there is evidence to justify the widening of the employment uses that are proposed, in order to deliver a high-quality new employment area that meets the diverse demands of the market, and set out modifications that are required to the proposed allocation policy requirements.

The owners also supports requirement D of Policy SS1, which states that *“the reuse and/or redevelopment of land within the defined St George’s Barracks and Woolfox Opportunity Areas will be supported where it accords with the requirements of Policy SS4 and the principles and requirements of any adopted masterplan, SPD or DPD for the site”*. Indeed, the owners’ response to Policy SS4 demonstrates that such an approach is entirely appropriate, in that it maximises the development potential of a part-brownfield site that is free from any insurmountable constraints and is located in a strategic location. The site has the potential to deliver a sustainable new settlement to meet the housing needs arising in the area in the medium and long-term; which is a positive and effective approach to planning for Rutland’s needs. The owners’ response to Policy SS4 provides more detail, and proposes modifications to the policy to ensure that that it is sound.

**QUESTION 4: PLEASE SET OUT THE MODIFICATION(S) YOU CONSIDER NECESSARY TO MAKE THE JOINT LOCAL PLAN LEGALLY COMPLIANT AND SOUND, IN RESPECT OF ANY LEGAL COMPLIANCE OR SOUNDNESS MATTERS YOU HAVE IDENTIFIED ABOVE:**

The broad principles of the spatial strategy are justified, effective and positively prepared. Likewise, the general scope of the supporting policies is also sound and correctly reflect the suitability of land at the former RAF Woolfox both to deliver employment uses within the current plan period, and to support the delivery of a residential-led mixed use development in the medium to long-term.

However, as set out in further detail in the owners' response to Policy E1.5, the RLP should accommodate a higher level of growth within the allocation site at Woolfox, and therefore the spatial strategy should be updated accordingly to reflect the higher level of growth that is required; firmly committing to a minimum level of growth that is well above 16ha. Those modifications will ensure that the RLP is entirely effective, building on the robust general principles set out in the Regulation 19 version of the RLP.

**QUESTION 5: ATTACHMENTS**

No attachments in response to this policy.

**QUESTION 6: IF YOUR REPRESENTATION IS SEEKING A MODIFICATION TO THE PLAN, DO YOU CONSIDER IT NECESSARY TO PARTICIPATE IN THE EXAMINATION HEARING SESSION(S)?**

Mr PJSR Hill and his family company (the owners) consider that modifications are required to Policy SS1 and the supporting site allocation policies to ensure that the plan is sound. As the landowner of a key employment allocation site that will deliver during the plan period (Woolfox Depot, Policy E1.5) as well as the wider Woolfox Opportunity Area (Policy SS4, which could play a key role in meeting the area's housing and employment needs in the medium to long-term), the owners request that they are present at the examination hearing sessions relating to Policies SS1, SS4, E1, and E1.4; with a view to agreeing the modifications to those policies that are required to ensure that they are effective.

#### 4. POLICY SS4 – FUTURE OPPORTUNITY AREAS:

##### QUESTION 1: SUPPORT OR OBJECT:

Object.

##### QUESTION 2: DO YOU CONSIDER THE PLAN IS:

- **LEGALLY COMPLIANT?** Yes.
- **SOUND?** No.
- **COMPLIES WITH THE DUTY TO CO-OPERATE?** Yes.

##### QUESTION 3: COMMENTS:

This representation is submitted on behalf of Mr PJSR Hill and his family business Pikerace, who are the owners both of the Woolfox Future Opportunity Area (Policy SS4) and the proposed employment site at Woolfox Depot (proposed to be allocated by Policy E1.5). Therefore, Mr PJSR Hill and his family business are henceforth referred to as “the site owners” for the purposes of this comment.

As the sole landowner of the promoted site at the Former RAF Woolfox Barracks (henceforth “Woolfox”), the owners support the identification of the site as a “Future Opportunity Area” in Policy SS4. As set out below, that approach is entirely appropriate in that it will maximise the potential of a suitable part-brownfield site in a strategic location to deliver a residential-led mixed use development to meet housing and employment needs arising in the County (and potentially the wider region) in the medium to long-term. With that said, the following representations highlight that some modifications to the policy are required to ensure that it is sound in NPPF terms.

##### **Strategic Importance:**

As is recognised by the Regulation 19 RLP, Woolfox is “*strategically well placed*” relative to surrounding settlements and the existing transport infrastructure that connects the County and wider sub-region.

The site’s location adjacent to the A1 is strategically favourable. That is reflected in the Highway Officer’s comments in relation to the proposed employment allocation adjacent to the wider Woolfox site, which state that “*the site is located in an ideal location, close to and within easy access of the A1*” (see the Call for Sites Register). Indeed, the site is located immediately adjacent to the southbound slip road off of the A1. Southbound traffic seeking to access the Woolfox site would, therefore, be able to easily access it via new access roundabouts off the A1 (as discussed in further detail below). Vehicles seeking to egress the site and travel south along the A1 would then be able to re-enter via the slip lane to the south of the site. Northbound traffic would also be able to access the site with ease, exiting the A1 via the slip lane onto Grantham Lane, and then accessing the Great North Road.

The A1 forms a key part of the Strategic Road Network (SRN). It links the site with the nearby settlements of Stamford and Grantham; both of which are large settlements with a range of services and facilities. On a more strategic level, the A1 (including the A1(M) in parts) connects London and Edinburgh, running past / through major towns in the wider sub-region. It also provides onwards connections to the A47 and A14 to the south, which are key east – west links within the wider area. The site’s location relative to the A1 is, therefore, strategically beneficial, and can support the delivery of a well-connected new settlement with a mix of uses that is responsive to that location.

Furthermore, and as recognised in the supporting text, the site has the potential to meet the long-term housing and economic needs of Rutland County and / or the wider sub-region. That is by virtue of its location towards the north east of the County, and the connectivity that the A1 provides to nearby key

settlements that are outside of Rutland County (notably Stamford and Grantham, but also Peterborough). Given the Government's intention to introduce "*mandatory mechanisms for strategic planning*" that will cover "*functional economic areas within the next five years*" (see the Government's recent consultation in relation to proposed changes to the NPPF and national planning policy more widely), Policy SS4 itself should clearly highlight the potential for the site to meet Rutland's housing and economic needs **and** sub-regional needs. That, alongside a strengthened commitment / mechanism for the site's delivery as and when it is required (as set out below), would aid the future allocation of the site in a subsequent full Local Plan Review (LPR), a specific Development Plan Document (DPD) in relation to the Future Opportunity Area sites, or a strategic level plan.

**Site Suitability:**

The site is also inherently suitable for residential-led mixed use growth. For a strategic-scale site, it is reasonably free from constraints, and those constraints that do exist can be readily mitigated against. By way of a summary:

*Access and Highways:*

- The site can be accessed off of the A1 via new access arrangements. Opportunities for sustainable modes of travel, responding to the site's A1 setting, will be considered in consultation with RCC.
- Preliminary capacity assessments have been undertaken to support the delivery of the adjacent proposed employment site (see the owners' response to Policy E1.5 for further detail). They have indicated that the A1 infrastructure has sufficient capacity to accommodate the early phases of residential and employment development, and that there is scope to accommodate any junction improvements / new infrastructure required as a result of the delivery of the wider site.

*Drainage:*

- The vast majority of the site is located within Flood Zone 1. A small part of the site is located within Flood Zone 3; however, that is limited only to the site's northernmost extents, and is reasonably well-contained within the existing watercourse that straddles Stretton Road and Holywell Road.
- The majority of the site is at very low risk of surface water flooding. It is recognised that there are some 'fingers' of low, medium and high surface water flood risk (as is the case across the County). However, built development can be configured to avoid such areas or provide sufficient drainage capacity and landscape treatment to channel surface water flows to SuDS features.
- Unlike large areas of the County and surrounding sub-region, the site is not at risk of flooding from reservoirs.

*Landscape and Visual Impacts:*

- It is recognised that a full Landscape and Visual Impact Assessment will be required to further refine the proposals for the site's development. That work is ongoing.
- However, the site is not located within a designated National Landscape, nor has it been identified as a site of specific landscape sensitivity or value within the extant or emerging Local Plan.
- An initial audit of the site has confirmed that the site exhibits a reduced perception of tranquillity, with traffic passing along the busy A1, and is partly despoiled by the disused airfield (including concrete runways, hardstanding, perimeter tracks and ancillary buildings that are interspersed by arable farmland). The site is, therefore, not particularly sensitive from a landscape perspective.
- The site is set within a robust landscape framework. A robust belt of vegetation comprising of outgrown shrubbery and semi-mature trees is located alongside the A1 at the site's south-west boundary. Some loss of vegetation is anticipated to facilitate site access (to the employment site in the first instance, but additional development thereafter). However, that will be more than offset by new tree, hedgerow and shrub planting within the site. Existing woodland blocks are also

located within the site's internal area, providing a strong landscape setting for the built development to sit within.

*Ecology and Arboriculture:*

- The Woolfox site is not subject to any statutory ecological designations. The Clipsham Old Quarry and Pickworth Site of Special Scientific Interest (SSSI) is located immediately adjacent to the site at its east. However, there is scope to ensure that built development is not located in the part of the allocation site that sits adjacent to the SSSI, with the current Masterplan proposing that the area could accommodate a solar farm.
- The allocation site includes an existing Local Wildlife Site (Obsonall Wood LWS). That area can be retained in situ with appropriate offsets provided.
- A LWS is located adjacent to the proposed employment allocation site (Rutland County Golf-Club (A1) Verge – North LWS). As discussed in further detail in response to Policy E1.5, loss of part of that LWS will be necessary in order to accommodate access to the employment site and wider Woolfox development. However, suitable habitat compensation will be undertaken as part of the delivery of the employment site.
- It is recognised that the emerging RLP identifies a number of woodland areas within the Woolfox site as candidate / potential LWSs. It appears at this stage that those areas can largely be retained in situ, with appropriate development offsets provided.
- The site is sufficiently large to ensure that net gains to biodiversity can be maximised within it, in line with the Biodiversity Net Gain hierarchy.

*Built Heritage and Archaeology:*

- The proposed allocation site is not subject to any statutory heritage designations itself. That is, there are no listed buildings, scheduled monuments, or designated World Heritage Sites within the site. In terms of non-designated assets, it is also noted that the site itself is not subject to a Conservation Area (CA) designation.
- There are statutory and non-statutory heritage designations within the surrounding area, notably in the nearby villages of Clipsham, Stretton and Pickworth. That relates to clusters of listed buildings that, in the case of Clipsham and Stretton, are located within CAs.
- The impact on those assets will be considered when refining the proposals for the site. However, in some cases intervisibility between those assets and the site will be limited by the intervening built form and topography, as well as existing and new planting. Moreover, given the size of the site there is sufficient flexibility to locate built development so as to reduce any impacts as far as possible.

*Minerals:*

- It is recognised that the majority of the wider Woolfox site is identified as a Limestone Aggregate Area of Search, and is therefore subject to Policy MIN1.
- An initial Minerals Resource Assessment (MRA) of the site has been undertaken, and has assessed the site based on three areas. It has found that:
  - In the Northern Area, Clipsham Stone is absent in lower lying areas and, where it is present, it is relatively poorly developed, often overlain with a significant thickness of uneconomic clay overburden, and its extraction could potentially be limited by the presence of LWSs or below ground utilities. Therefore, the MRA concludes that the extractable resource is limited to a small area but that, given the likely phasing of the development, it could be extracted without impacting on the delivery of the development.
  - In the Southern Area, the limestones are overlain by a variable and in parts significant clay overburden. Site investigations have confirmed that the Clipsham Stone resource in this

area is poorly developed across much of the area and that, accordingly, the limestone is unlikely to be economically recoverable in an environmentally acceptable manner.

- In the Eastern Area, good quality Clipsham Stone is understood to be present, though it is in parts overlain by clay of a significant thickness. It is considered that the presence of the adjacent quarry means that some of the underlying stone can be partially accessed in an economic and environmentally acceptable manner. The MSA therefore recommends that the limestone resource beneath the eastern outcrop of the site is safeguarded for future extraction. It is understood that, once those minerals are extracted, the area can be subsequently built on. Therefore, the Masterplan proposes a solar farm in this location in due course.

*Previous Land Use:*

- It is recognised that the site does not entirely consist of previously developed land (PDL), and that there are elements of agricultural land. However, the site's re-development would realise the re-use of a substantial area of PDL, in the same manner that the re-development of St George's Barracks would. The Woolfox site should, therefore, be presented in the same manner as a part-brownfield / PDL site.

Therefore, it is clear that the wider Woolfox site is not subject to any constraints to development that cannot be overcome through sensitive masterplanning (for example the sensitive arrangement of uses) and the implementation of primary and secondary mitigation. In light of the site's suitability and strategic location for development, it is appropriate for RCC to consider how it can maximise the potential of a part-PDL / brownfield site to provide a mixed use development that could play a critical role in the County's development strategy in the medium to long-term.

**Development Potential:**

An initial Vision Document has been prepared and submitted alongside these representations. The initial Masterplan as contained within the Vision Document provides an indication of the potential capacity of the site. However, it should be noted that the Masterplan will be reviewed to respond to the proposals relating to the employment allocation site (as discussed in response to Policy E1.5), to reflect the findings of the additional technical and environmental site assessments that are being undertaken, respond to urban design best practice, and to take account of the feedback that is received from RCC and statutory consultees through the Masterplan approval process as detailed in Policy SS4 (commented on below).

With that said, the Masterplan clearly demonstrates the opportunity at hand to deliver a fully-functioning, self-sufficient, sustainable and forward-thinking new settlement. It establishes how the new settlement at Woolfox will support the delivery of (i) much-needed housing across a mix of market and affordable house types, tenures and sizes, (ii) employment premises that respond to market needs and demands that will support investment into Rutland and reinforce the role that the County plays in supporting new and growing industries, and (ii) the critical infrastructure, services and facilities required to support a thriving and sustainable new community.

The Masterplan is underpinned by a number of key principles that effectively reflect a modern variation to the Garden Community Principles and will help to realise the vision for the new settlement and shape the further refinement of the Masterplan. The key underpinning principles are as follows:

- The delivery of a significant quantum of high quality, net zero ready market and affordable homes across a range of sizes, types and tenures that will meet the needs of the authority and potentially the wider sub-region.



- The provision of an expansive employment area along the A1 frontage that will provide a range of employment premises, covering the industrial / manufacturing, warehousing, distribution, logistics and office sectors. This will deliver new jobs for residents of the site, as well as Rutland County and the sub-region more widely, attract inward investment and establish Rutland as a hub for new / emerging industries. In that regard, De Montfort University (DMU) is working alongside the owners to consider opportunities for innovative Sustainable Urban Living Labs (SuLabs) that would form a key part of the Woolfox development. The submitted supporting statement from DMU provides further detail in that regard.
- There is an opportunity to provide supporting infrastructure along the A1, potentially including an off-line trunk road service area.
- The infrastructure, services and facilities that are required to support the new community will be distributed across the site to ensure that the day-to-day needs of all residents will be met. That means there will be both a clear heart to the development (incorporating high density residential development, alongside new primary / secondary schools, sports facilities, strategic open space and retail uses), but also smaller local centres that will be distributed throughout the site. (
- The key uses within the site will be linked via new pedestrian and cycle routes that will be safe, attractive and convenient. That will promote active and sustainable forms of travel for day-to-day journeys.
- Opportunities to accommodate internal and external public transport services will be developed. Indeed, the development is of a sufficient scale that it will provide the critical mass to support such solutions. The site's location on the A1 will also assist in that regard, as the development will form part of a linear arrangement of higher order settlements along the A1 (Grantham, Woolfox, and Stamford).
- Likewise, the scale of development proposed will provide the critical mass to consider how low / net zero carbon technologies and infrastructure can be embedded into the development from its outset. The Masterplan currently proposes a solar farm within the east of the allocation site, and a water treatment and anaerobic digester plant to its south-east (though that will move to accommodate the delivery of employment uses). There is a significant opportunity to maximise Zeeco's forward-thinking research and development, given the location of an industry leader within the site.
- The proposals will respond to the site's landscape resource and setting. Those areas will be used to break up the development form in views towards the site, and define individual character areas within the development. For more sensitive landscape features (such as the woodland blocks), an appropriate offset will be provided to the nearest developable area, and the nature of adjacent uses will be carefully considered. The site's development will, therefore, respond to its landscape setting, but also promote the wellbeing benefits of interacting with the natural environment.

It is understood that the fine-grain nature of the development proposals is not a matter of relevance to this iteration of the LPR, and therefore the Woolfox consultant team look forward to discussing the site, its merits and its development potential with RCC in further detail through the preparation of a new LPR / DPD.

**Delivery Mechanism:**

The owners recognises RCC's intention, as set out in Policy SS4, to bring forward a LPR / new DPD that will cover the allocation of the Future Opportunity Areas and agreeing the Masterplan for their development. They also welcome RCC's activity in that regard over recent months, with RCC having updated their Local Development Scheme to cover the timetable for the preparation of a future LPR. That refers to an initial Call for Sites in Spring 2025 to begin that process, with an aim to undertake consultations through 2025, 2026 and 2027, and then submit the LPR for examination in 2027/28.

Whilst the owners support the Council's intention in that regard, the evolving planning policy context means that RCC will soon be reliant on the delivery of additional allocation sites to ensure that it can maintain a five year housing land supply in the long-term; even despite the identification of allocation sites in the RLP. Indeed, whilst it is noted that the Government's new Standard Method (SM), if adopted, does not apply to the RLP by virtue of the transitional arrangements, it is of relevance to the long-term planning policy context that the delivery of strategic sites such as Woolfox sits within. The proposed SM results in a new Local Housing Need (LHN) of 264 dwellings per annum (dpa), which is more than double RCC's current LHN of 123dpa using the current SM. It is recognised that, for the purposes of five year housing land supply (5YHLS) monitoring, the adoption of the RLP will effectively "lock in" the current LHN for five years. However, the change to the LHN thereafter will necessitate a very sudden step change in the level of housing that will need to be delivered for RCC to maintain a favourable 5YHLS position in the medium to long-term.

That emphasises the need for RCC to ensure that the new LPR (i.e. for the Local Plan that will supplement or replace the RLP) is adopted in a timely manner, and that it incorporates a sufficient number and mix of sites that will be well-advanced enough to ensure that they are deliverable when the new LHN kicks in. Otherwise, RCC will be open to speculative planning proposals.

Therefore, the owners propose that Policy SS4 makes a firmer commitment to adopting the new LPR within short succession of the RLP's adoption. It is proposed that, to do so, Policy SS4 should be modified to **clearly commit to the submission of the new LPR for examination by the summer of 2027**. That would ensure that there is sufficient time for the LPR to be adopted within 5 years of the RLP's adoption, allowing RCC to remain in control of which sites are delivered to meet its housing needs. Critically, that would ensure that a sustainable and suitable part-brownfield site can be delivered to meet the area's housing needs as and when it is required, ensuring that a part-brownfield site is preferred to greenfield sites that are lower in the site selection hierarchy and could potentially be less suitable.

In that regard, the owners look forward to working alongside RCC to bring forward a subsequent DPD / review to the Local Plan that would positively plan for the area's needs by facilitating the delivery of the Woolfox site.

#### **Allocation Policy Requirements:**

The scope of the proposed allocation policy requirements is generally appropriate. However, some modifications are required to ensure that Requirement H (relating to infrastructure) is "*clearly written and unambiguous*" as required by NPPF paragraph 16d, and therefore effective.

The intention of requirement H is recognised, given the importance of ensuring that infrastructure is delivered as and when it is required to support residential development. However, as written the policy could be misconstrued as requiring **all** infrastructure with or ahead of the first residential deliveries.

In reality, the important factor is whether the infrastructure that is required to support a specific element / phase of development is delivered as required. In some circumstances, such as the delivery of schools (which would likely be delivered by the education authority), it may not be appropriate for such facilities to be delivered in full ahead of the first occupations, and instead may be more appropriate for delivery to be phased. In other circumstances, such as the delivery of highway improvement, delivery may only be required at a certain trigger. The wording of the requirement, as currently written, could potentially complicate such mechanisms.

It is suggested, therefore, that the requirement is amended to read as follows: “*detail the delivery of an appropriate amount and range of infrastructure to support the uses and community on the site which must be delivered in tandem with or ahead of **the phase of development that it is associated with, or within a timescale as agreed with the local authority, service providers (i.e. the education authority) and other statutory consultees (i.e. the highway authority).***”

**Site Boundary:**

Likewise, the proposed site boundary is broadly appropriate, but requires some modifications to ensure that the full extents of the promoted site are reflected, and that the Future Opportunity Area boundary aligns with the revised employment allocation boundary. Three specific modifications are proposed:

- At the east of the site, the boundary currently splits into two areas (adjacent to Hardwick Wood), without following a natural boundary. The boundary should follow the field boundary to reflect the full land ownership of the owners, and to ensure that a connection between the main part of the allocation site and the eastern area can be facilitated.
- To the south, the area to the immediate north of Hardwick Wood is currently excluded from the Future Opportunity Area’s boundary without explanation. That area falls under the ownership of the owners and should be included.
- As set out in the owners’ response to Policy E1.5, the boundary of the employment allocation site should be extended to accommodate a greater level of employment development and reflect the practicalities of delivering the employment site. Once that allocation boundary is updated, then the boundary of the Future Opportunity Area should also be modified.

The proposed boundaries are set out in the attached Proposed Allocation Boundary Plan (ref. DE\_619\_101).

**Conclusion:**

Mr PJSR Hill and his family business, as the owner of the Woolfox Future Opportunity Area, supports the identification of the site at the Former RAF Woolfox as a “Future Opportunity Area”. That approach will maximise the potential of a suitable part-brownfield site in a strategic location to deliver a residential-led mixed use development, and therefore reflects a positive approach to planning for the area’s identified needs. In that regard, the owners look forward to working alongside RCC to bring forward a subsequent DPD / review to the Local Plan that would positively plan for the area’s needs by facilitating the delivery of the Woolfox site.

However, as above, modifications are required to the policy to ensure that it is sound in NPPF terms; notably in terms of the policy wording surrounding the site’s development potential and part-brownfield / PDL nature, the mechanism for the delivery of the LPR, allocation requirement H, and the boundary of the Future Opportunity Area.

**QUESTION 4: PLEASE SET OUT THE MODIFICATION(S) YOU CONSIDER NECESSARY TO MAKE THE JOINT LOCAL PLAN LEGALLY COMPLIANT AND SOUND, IN RESPECT OF ANY LEGAL COMPLIANCE OR SOUNDNESS MATTERS YOU HAVE IDENTIFIED ABOVE:**

As set out in response to Question 3, Mr PSR Hill and his family (as the owners of the site) supports the general scope of the policy, which correctly recognises the opportunity at hand to develop a suitable site in a strategic location as a sustainable new community for Rutland.

However, to ensure that the policy is efficient and sound, the following modifications are required:

- The main body of Policy SS4 should be updated to clearly reference the site's potential to meet the future housing and economic needs of the County and / or the wider sub-region beyond the current plan period.
- The main body of Policy SS4 and its supporting text should be updated to reflect the site's part-brownfield / PDL nature, recognising that the site comprises a disused airfield, including concrete runways, hardstanding, perimeter tracks and ancillary buildings/
- It is important that the future LPR / new DPD is adopted in a timely manner to ensure that there is a sufficient housing supply in the medium / long-term to respond to the step-change in the area's LHN. Therefore, Policy SS4 itself should make a firm commitment to submitting the new LPR for examination by the summer of 2027.
- Allocation requirement H should be revised to read as follows: *"detail the delivery of an appropriate amount and range of infrastructure to support the uses and community on the site which must be delivered in tandem with or ahead of **the phase of development that it is associated with, or within a timescale as agreed with the local authority, service providers (i.e. the education authority) and other statutory consultees (i.e. the highway authority).**"*
- The boundary of the Future Opportunity Area should be revised to:
  - Ensure that the eastern outcrop runs to the field boundary at its west, in order to ensure that a connection can be provided between the two parts of the site.
  - Include the area to the immediate north of Hardwick Wood.
  - Respond to the expanded employment allocation boundary that should be revised (see the owners' response to Policy E1.5).

#### **QUESTION 5: ATTACHMENTS**

Proposed Allocation Boundary Plan (ref. DE\_619\_101).

Vision Document (6965 Vision Document\_201103\_Spreads\_LR).

Supporting Statement from De Montfort University.

#### **QUESTION 6: IF YOUR REPRESENTATION IS SEEKING A MODIFICATION TO THE PLAN, DO YOU CONSIDER IT NECESSARY TO PARTICIPATE IN THE EXAMINATION HEARING SESSION(S)?**

MR PJSR Hill and his family business ("the owners") are the sole landowner of the proposed Future Opportunity Area at Woolfox which, as set out in their representations, could and should form a key part of the spatial strategy beyond the plan period. However, some modifications are required to ensure that Policy SS4 is effective and sound. As the promoter of the site, it is essential that the owners are present to discuss that matter with the Council and the Inspector(s).

## 5. POLICY E1.5 – WOOLFOX DEPOT, GREAT NORTH ROAD:

### QUESTION 1: SUPPORT OR OBJECT:

Support.

### QUESTION 2: DO YOU CONSIDER THE PLAN IS:

- **LEGALLY COMPLIANT?** Yes
- **SOUND?** No
- **COMPLIES WITH THE DUTY TO CO-OPERATE?** Yes.

### QUESTION 3: COMMENTS:

Mr PJSR Hill and his family business (henceforth “the owners”) are the sole landowner both of proposed allocation site E1.5 (Woolfox Depot), and the Woolfox Future Opportunity Area that has been identified under Policy SS4. The owners are supportive of the identification of the two sites as suitable areas for development, and is committed to working alongside RCC to ensure the delivery of high-quality development both within the employment allocation site and the wider Woolfox site.

With regard to the proposed employment site (Site E1.5) specifically, the owners are supportive of the site’s identification as a suitable location for growth. That reflects the strategic merits of the site’s location and the absence of any insurmountable constraints; which is set out in further detail below. However, some modifications to the allocation policy are required to ensure that it is “effective” as required by NPPF paragraph 35c, reflecting the realities of delivering an appropriate scale and mix of employment uses within this site.

#### **Strategic Importance:**

The owners’ response to Policy SS4 sets out the strategic benefits of their land at the Former RAF Woolfox Lodge for residential-led mixed use development; particularly given the site’s location on the A1 corridor between the nearby key settlements of Stamford and Grantham. That is also true for the delivery of an initial phase of employment development as proposed through Policy E1.5.

Indeed, as reflected in the Highway Officer’s comments regarding the proposed allocation state that “*the site is located in an ideal location, close to and within easy access of the A1*” (see the Site Allocation Assessment, Site Ref. 8033). Indeed, the allocation site is located off of the southbound slip road from the A1. Southbound traffic seeking to access the site would, therefore, be able to easily access it via new access roundabouts off the A1 (as discussed in further detail below). Vehicles seeking to egress the site and travel south along the A1 would then be able to re-enter via the slip lane to the south of the site. Northbound traffic would also be able to access the site with ease, exiting the A1 via the slip lane onto Grantham Lane, and then accessing the Great North Road.

The A1 forms a key part of the SRN. It links the site with the nearby settlements of Stamford and Grantham; both of which are large settlements with a range of services and facilities. On a more strategic level, the A1 (including the A1(M) in parts) connects London and Edinburgh, running past / through major towns in the wider sub-region. It also provides onwards connections to the A47 and A14 to the south, which are key east – west links within the wider area. The site’s location relative to the A1 is, therefore, strategically beneficial, and means that the site will be very well-connected to surrounding settlements and the wider region. As set out below, that is particularly prevalent given the recognition within the evidence base (in particular in the Employment Needs and Economic Development (ENED) paper) that there is a “roaming demand” for employment uses along the A1 corridor; as discussed below.

The strategic importance of the development in supporting the long-term vitality of the local and sub-regional economy, and also supporting the ongoing operation of an existing key employee in the area is also noted. Indeed, a key element of the development proposals that are currently being advanced is to provide the additional floorspace that is required to serve the medium and long-term expansion needs of Zeeco Europe Ltd (henceforth referred to as “Zeeco”). Zeeco are both a world-leader in the design and manufacture of advanced combustion and environmental solutions, and a key employer in the County and the wider sub-region; with Zeeco Europe’s premises in Rutland employing **XXX members of staff**. The additional floorspace that is proposed through the emerging development proposals will support Zeeco’s long-term expansion of its research, design, testing, and manufacturing works. Critically, it will allow for Zeeco to internalise a number of associated processes that are currently sub-contracted or operate out of different premises. The delivery of the site will, therefore, ensure that Zeeco can continue to operate from its current premises in Rutland, in a sustainable and more efficient manner whilst also supporting and expanding the business operations of a key employer.

The strategic merits of providing employment uses in this area, both to meet Zeeco’s expansion needs and to deliver other employment land, are clear, and the identification of the site’s development potential is justified. Indeed, this clearly offers an opportunity to attract related industries to the area, and create an attractive and innovative employment hub within Rutland.

**Site Suitability:**

The site is also free from any insurmountable constraints to development:

*Access and Highways:*

- As above, the site can be accessed off of the A1 via new access arrangements.
- Preliminary capacity assessments have been undertaken to support the delivery of the site. They have indicated that the existing A1 infrastructure has sufficient capacity to accommodate the employment use, and that there is also sufficient capacity to deliver early phases of residential / other supporting uses that could be delivered under Policy SS4.

*Drainage:*

- The allocation site is located entirely within Flood Zone 1.
- The majority of the site is at very low risk of surface water flooding. It is recognised that there are some ‘fingers’ of low, medium and high surface water flood risk (as is the case across the County). However, the development can provide sufficient drainage capacity and landscape treatment to channel surface water flows to SuDS features.
- Unlike large areas of the County and surrounding sub-region, the site is not at risk of flooding from reservoirs.

*Landscape and Visual Impacts:*

- A Landscape and Visual Impact Assessment (LVIA) will be submitted to support the forthcoming planning application for the delivery of the employment allocation site.
- The site is not located within a designated National Landscape, nor has it been identified as a site of specific landscape sensitivity or value within the extant or emerging Local Plan.
- An initial audit of the site has confirmed that the site exhibits a reduced perception of tranquillity, with traffic passing along the busy A1, and is partly despoiled by the disused airfield (including concrete runways, hardstanding, perimeter tracks and ancillary buildings that are interspersed by arable farmland). The site is, therefore, not particularly sensitive from a landscape perspective.
- The site is set within a robust landscape framework. A robust belt of vegetation comprising of outgrown shrubbery and semi-mature trees is located alongside the A1 at the site’s south-west

boundary. Some loss of vegetation is anticipated to facilitate access to the employment site, but that will be more than offset by new tree, hedgerow and shrub planting.

*Ecology and Arboriculture:*

- The site is not subject to any statutory ecological designations. The Clipsham Old Quarry and Pickworth Site of Special Scientific Interest (SSSI) is located to the north-east (immediately next to the wider Opportunity Area). The site is considered to be sufficiently distant from the SSSI that it will not impact on it.
- A Local Wildlife Site (LWS) is located adjacent to the south-western boundary of the allocation site. For the reasons set out below, the loss of part of that LWS will be necessary to accommodate access to the employment site (and wider Woolfox development in due course), but suitable habitat compensation will be secured as part of the delivery of the employment site.
- The proposed extension to the allocation boundary (as set out below) will ensure that net gains to biodiversity can be maximised within it, in line with the Biodiversity Net Gain hierarchy.

*Built Heritage and Archaeology:*

- The proposed allocation site is not subject to any statutory heritage designations itself.
- Whilst the application site lies within the area of the former RAF Woolfox Lodge Airfield, it does not include any standing buildings. The site encroaches slightly onto the extent of the concrete runway, but will not compromise the legibility of this feature of the airfield. It does not contain any extant features relating to the former Bloodhound Missile compound to the north-west, and therefore significant effects are not anticipated.
- In the wider area, the Grade II Registered Exton Park lies to the west. However, this asset and the Listed buildings within it are visually separated from the site by topography and vegetation, as well as the Great North Road, and the site is not considered to contribute to the significance of the asset through setting. No significant effects relating to these assets are anticipated through the proposed development.

*Minerals:*

- It is recognised that part of the allocation site is identified as a Limestone Aggregate Area of Search, and is therefore subject to Policy MIN1.
- An initial Minerals Resource Assessment (MRA) of the wider Woolfox site has been undertaken. The site is located in the Southern Area, where limestone is overlain by a variable and in parts significant clay overburden. Site investigations have confirmed that the Clipsham Stone resource in this area is poorly developed across much of the area and that, accordingly, the limestone is unlikely to be economically recoverable in an environmentally acceptable manner.
- In that light, the owners' comments regarding the scope of the allocation requirement relating to minerals are provided below.

**Quantum and Mix of Employment Land:**

As above, the owners strongly support the proposal to allocate land at Former RAF Woolfox Lodge for the delivery of employment uses. It is understood that the proposed allocation site boundary / size (at 8.2ha) and the proposed permitted employment uses (light industrial) have been informed in part by the size and configuration of the site that was promoted at previous stages of the RLP's preparation.

However, the owners are currently advancing an outline planning application (OPA) for the delivery of the proposed allocation site. The OPA seeks to respond to the immediate need for Zeeco's expansion (as set out above), respond to wider employment needs and demand, and deliver a development scheme that would represent an attractive first phase of the wider Woolfox development if that is taken forward

in the next LPR. A formal pre-application advice request was submitted in early November 2024, and it is intended that the OPA will be submitted in December 2024; to respond to the immediate need for employment premises and demonstrate the allocation site's deliverability in support of the RLP. The emerging Placemaking Plan has been submitted alongside these comments for reference (DE\_619\_52).

As part of that, the consultant team have very carefully considered the level and mix of employment land that is required to respond to the need / demand arising from this location, as well as the land take that is required to provide the supporting infrastructure alongside that (both that required to support the employment development, and that required to support a first phase of the wider Woolfox development). As presented below, that evidence clearly justifies a higher level of employment development within the site, beyond that proposed in Policy E1.5.

The need for a greater quantum of employment development in this location:

The NPPF sets out a clear expectation that the planning system should contribute to the achievement of sustainable development, including the provision of commercial development in a sustainable manner. In doing so, it sets out three interdependent economic, social and environmental objectives (paragraph 8). The economic objective highlights that the planning system should *"help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation, and improved productivity; and by identifying and coordinating the provision of infrastructure"*.

Paragraph 85 of the NPPF continues to state that *"planning policies and decisions should help create the conditions in which businesses can **invest, expand and adapt**. **Significant weight** should be placed on the need to support economic growth and productivity, taking into account both **local business needs and wider opportunities** for development."* It continues to state that *"the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future"*. That is considered to be *"particularly important where **Britain can be a global leader in driving innovation**, and in areas with high levels of productivity, which should be able to capitalize on their performance and potential."*

The ENED that has been prepared in support of the RLP considers the amount of employment land that should be delivered to meet the County's employment needs, based on three scenarios. The range of employment needs derived from that exercise is between 19.7ha and 36.4ha, across all employment-generating use classes. Between the ENED and the RLP, it is clear that there will be a supply of 6.82ha from the existing allocation site at Uppingham Gate, that there will be a moderate gain of 0.27ha through extant planning permissions, and that the new allocations in the RLP (excluding Uppingham Gate) will deliver 19.6ha of employment land. That totals 26.7ha of employment land.

At face value, that falls within the range of 19.7ha and 36.4ha. However, it is clear when considering the breakdown of the employment need figure that there is actually a need to maximise the potential of the proposed allocation sites to deliver a higher level of employment land. Indeed, whilst the ENED sets out a reasonably clear recommendation for the level of office / R&D need (1.5ha, although the ENED suggests that a level of up to 2.2ha could be delivered through a pragmatic approach), there is significantly more flex in the level of industrial and warehousing need; between 18.2 and 34.9ha. The ENED states that 18.2ha of industrial / warehousing land should be delivered as an absolute minimum, that *"preferably the mid-point of 26.6ha"* would be used, but that *"it would not be unreasonable to look above 26.6ha to help facilitate business growth – and even up to 34.9ha."*



Whilst the total identified supply is just above the preferable mid-point of 26.6ha, this does not provide any reasonable buffer (if, for example, one of the allocated sites was not delivered), and it is also noted in any case that the allocations for a number of the sites seek a range of employment uses; which will include uses outside of industrial / warehousing use classes. That means it is uncertain whether the actual level of industrial / warehousing delivery over the plan period will meet the mid-point of 26.6ha; which is the minimum starting point that the ENED identifies.

That in itself provides justification to maximise employment land delivery in the identified allocation sites. However, as above, the ENED clearly sets out that a level **above** 26.6ha of industrial / warehouse land (28.1ha of all employment land, including the 1.5ha of office land) would be appropriate where that would help to facilitate business growth. That provides further justification to increase the level of employment land that will be delivered at the Woolfox allocation (E1.5), both in that the development will facilitate business growth in a literal sense by meeting the long-term expansion needs of Zeeco (a key business in Rutland), and will also facilitate economic growth / investment more widely by promoting new business activity in the County. It would also promote opportunities for enhanced business efficiencies / synergy, which would attract further inwards investment into the County.

The need for additional land is also reflected elsewhere in the ENED, which highlights the tangible demand for employment growth along the A1 corridor. Paragraphs 3.16 and 3.17 highlight that there is likely to be a *“demand for larger units given the connectivity strengths of the A1”* but highlights that there has been a lack of supply of larger-scale industrial / warehousing units along the length of the A1 corridor within Rutland’s jurisdiction. There is, therefore, very clear evidence to suggest that employment delivery at Woolfox, as an existing employment area on the A1 corridor, should be maximised to respond to the need arising from within the County.

That justification is only strengthened by the clear external need / demand for employment uses in this location; with ENED paragraph 5.56 referring to the *“non-locally derived demand arising on the A1 corridor.”* The ENED also refers to agent feedback referring to *“‘roaming’ occupier investment on the A1 corridor that could support a larger development of a combination of logistics with potentially a mix of other manufacturing / smaller units.”*

There is, therefore, clear justification to maximise the level of employment development that is realised from the proposed allocation site at Woolfox (Site E1.5). Indeed, that would ensure that a sufficient level of employment land is delivered to meet the County’s employment needs with an appropriate buffer, that there is sufficient land to meet the expansion needs of individual businesses and the local economy more widely, and that there is flexible floorspace to respond to the “roaming demand” along the A1. The proposed allocation area of the Woolfox Employment Site should, therefore, be extended beyond the 8.2 ha site that is currently shown, as discussed in further detail below.

The need for a greater mix of employment uses in this location:

The evidence base also points towards a need to support a greater range of employment land within the expanded Woolfox allocation site. With that said, the position in that regard is not particularly clear; with Policy E1 referring to industrial (i.e. B2) uses, and Policy E1.5 itself referring to light industrial (i.e. E(g)(iii)) uses.

It is understood that the proposed use is derived in part from the previous correspondence in relation to the site’s promotion. However, there has since been a great deal of evidence to suggest that there is a need and demand for a greater range of uses. Indeed, the emerging proposals, in terms of the scale / mix of employment uses, have been informed by evidence of need and market demand. They propose a

mix of general / light industrial, warehouse / distribution, and office uses (B2, B8 and E) to facilitate Zeeco's long-term expansion needs within an area of c. 4ha, and a mix of general industrial, storage and distribution, light industrial, office and service-based uses (B2, B8, E(g)(iii), E(g)(i), and E(c)) within an area of c. 8ha (in terms of building footprint) to meet the wider needs and demands arising in the area. An additional area of 7ha is required to facilitate site access, the internal road network, drainage, open space and BNG needs.

The wider mix of uses that is proposed would align with national policy and the Government's economic objectives. The NPPF makes clear that planning policies and decisions should "*recognise and address the specific locational requirements of different sectors*" (paragraph 87). That includes the full range of uses that are set out above and that are considered in the ENED. In doing so, the NPPF states that the approach through policies and decisions should "*allow each area to build on its strengths, counter any weaknesses and address the challenges of the future*" (paragraph 85).

In particular, the NPPF focuses on ensuring that policies maximise potential opportunities "*where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential*" (NPPF paragraph 85). Within that, paragraph 87 makes particular reference to "*making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.*" Footnote 44 of the NPPF also makes specific reference to the Government's Industrial Strategy. That sets out the Government's programme to become a global-leader in four innovative and emerging industries; notably including the Clean Growth industry; a field in which Zeeco is an internationally-renowned industry leader.

Those objectives are also reflected in the Rutland Economic Strategy (RES) and associated Insights Pack (IP) that have been published as part of the RLP's evidence base. The RES sets out RCC's vision to build a "*modern rural economy, with a productive, **sustainable, and diverse business base.***" To achieve that, the RES sets out the following four objectives:

- Objective 1 focuses on supporting clusters of technology-driven service sectors, green industry and agricultural sectors, with the view to creating high value jobs. It highlights how existing assets can be developed to create innovation and enterprise hubs, and suggests that inward investment and place marketing should be prioritised;
- Objective 2 focuses on the creation of resilient and productive local businesses that benefit from regional supply chains and collaboration. It highlights how that can be achieved by curating spatial corridors and employment clusters, supporting innovation and growth of existing businesses, with reference to net zero technologies;
- Objective 3 relates to the creation of a highly skilled workforce for current and future needs. A key element of that is maximising opportunities for learning and apprenticeships, with specific reference made around future tech and green skills.
- Objective 4 focuses on creating thriving places, including employment centres. Maximising the potential of such areas and the opportunity to provide a cluster of diverse but related uses will only contribute towards that.

It is clear that the development as proposed will achieve the key local and national economic objectives that have been identified.

Indeed, Zeeco is an industry leader in the emerging field of green technology. It designs and manufactures environmentally friendly solutions to "*capture emissions, destroy pollutants, manage waste and heat vital processes, to help operate more cleanly, efficiently, and reduce their CO2 footprint.*" The delivery of the

expanded employment area will ensure that such innovative processes can be retained within Rutland and the region more widely, and will introduce more training / up-skilling opportunities to support the long-term sustainability of Rutland's economy and the socio-economic fortunes of its population. The proposals would, therefore, assist in realising Objectives 1 and 3 of the RES.

As set out above, however, meeting Zeeco's needs alone will require the delivery of a range of uses within their expanded premises. That includes industrial and general industrial uses, but also extends to storage and distribution facilities and office units. The lack of flexibility in the uses proposed within the allocation policy should, therefore, be remedied from that perspective alone.

The allowance of a wider range of uses would also ensure that a thriving business area can be realised on a key spatial corridor, through the delivery of a range of employment uses within the residual area. As set out above, it is proposed that this area will incorporate a mix of general / light industrial, storage and distribution, office and service-based uses. In particular, the delivery of storage and distribution (B8) uses, which notably are excluded from the currently proposed uses, would respond to the inherent need for such uses along the A1 corridor as recognised in RCC's assessment of the promoted site at Tickencote; which has not been included as a proposed allocation.

Therefore, it is clear that the delivery of a wider mix of uses across a larger allocation site responds to the opportunity at hand to create a diverse but related employment area within a well-connected and highly attractive location. That could result in the formation of clusters of like-minded, forward-thinking businesses, located in an independent employment area with its own identity and facilities (including carbon neutral and zero technologies). That would be a significant benefit for the County, as a vibrant and attractive asset that will encourage inward investment, and would contribute to achieving Objectives 2 and 4 of the RES.

Notably, however, that will only be realised by extending the proposed allocation boundary and uses and taking an ambitious approach to maximising the potential of the site at Woolfox.

#### Proposed Modifications:

Therefore, it is proposed that the policy is modified to align with the development proposals that have been carefully advanced by the owners and their consultant team. Indeed, the proposals take account of evidence of need / market demand, the size and scale of employment premises that should be delivered as a result, and the extent / location of the supporting infrastructure that is required to facilitate the development; including the required access roundabout, the internal road network, parking, open space, land required to achieve a 10% biodiversity net gain, mitigatory planting, drainage etc.

Specifically, the following modifications should be made in that light:

- The site allocation boundary should be extended to reflect the boundary shown on the submitted Proposed Allocation Boundary Plan (ref. DE\_619\_101), with the site area updated to reflect a figure of c. 19.1 ha. The extent of the area has been considered in great detail, and reflects the practicalities of delivering the most appropriate level of employment uses.
- In a similar fashion to other proposed allocations, the allocated use should be modified to refer to "*a range of employment uses.*"

#### **Allocation Policy Requirements:**

The owners recognise the intention of the allocation policy requirements. However, having considered the practicalities of delivering employment uses within the site as part of advancing the OPA, the following policy modifications are required to ensure that the policy will be "*deliverable over the plan period*" and therefore effective in accordance with NPPF paragraph 35c.

Policy Requirement A and C:

Policy requirements A and C are inherently linked matters. Policy requirement A seeks to ensure that all border hedges are retained, whilst policy requirement C proposes that access to new units should be provided via the existing access point adjacent to the existing Zeeco premises.

However, there is a need to provide a new site access in the form shown on the submitted Placemaking Plan. The current access to Zeeco's premises is located in proximity to the A1 slip road exit. Whilst that access is serviceable for the current operation, the proximity of the access to the slip road means that there can be issues with the reduction of speeds from vehicles exiting the A1. The delivery of additional employment development in this location could potentially result in conflicts between traffic leaving the A1 and that trying to enter the site, particularly as the level of traffic accessing the site increases.

Therefore, the owners propose a new access roundabout at the south-eastern corner of the site. For the reasons as set out above, that is considered to be a more appropriate access solution than retaining the existing accesses, as it will naturally slow vehicle speeds and regulate traffic flows. That solution will also respond to Zeeco's need to be accessed via a separate access, in light of the nature of their operations. In the longer term, if and when the wider Woolfox site is delivered for mixed use development, the new roundabout will also define the transition to the site for traffic accessing it from the south; which would be a key entrance to the new settlement, and facilitate long-term growth.

Given the layout of the existing employment premises, the new roundabout can only be located towards the south of the site. That means that there will be loss to the planting along the A1. However, as the Placemaking Plan demonstrates, that loss will be more than offset by new planting within the scheme; which will also be located so as to contain the site in any longer-distance views and to create an attractive landscaped setting for the new employment premises.

In that context, policy requirements A and C should be removed, to reflect the practicalities of delivering employment uses in this site.

Policy Requirement D:

Again, the intention of policy requirement D, which states that proposals should be designed to "*ensure any development on the site does not impact on the Mineral Safeguarding Area*" (MSA), is recognised. However, as currently worded it could be misconstrued as suggesting that development should not encroach into MSA whatsoever. Clearly, that would be contrary to the approach set out in the NPPF; which is clear in stating that the key consideration is whether the extraction of any mineral resource is "*practical and environmentally feasible*" (NPPF paragraph 216d).

As set out above, the MRA of the Woolfox site confirms that limestone in this area is overlain by a variable and in parts significant clay overburden, and that site investigations have confirmed that the Clipsham Stone resource in this area is poorly developed across much of the area. Therefore, any limestone is unlikely to be economically recoverable in an environmentally acceptable manner. In that context, Policy Requirement D should be deleted.

**Conclusion:**

The owners strongly support the identification of the Woolfox employment allocation, which reflects the strategic merits of the site and its suitability to accommodate employment uses. However, to ensure that the policy is effective and positively prepared, it should be modified to accommodate a greater

quantum and wider range of employment uses, with the site's boundary modified accordingly, and the proposed allocation policy requirements should be modified to reflect the realities of delivering the site.

**QUESTION 4: PLEASE SET OUT THE MODIFICATION(S) YOU CONSIDER NECESSARY TO MAKE THE JOINT LOCAL PLAN LEGALLY COMPLIANT AND SOUND, IN RESPECT OF ANY LEGAL COMPLIANCE OR SOUNDNESS MATTERS YOU HAVE IDENTIFIED ABOVE:**

This representation is submitted on behalf of Mr PJSR Hill and his family business Pikerace, who are the owners both of the Woolfox Future Opportunity Area (Policy SS4) and the proposed employment site at Woolfox Depot (proposed to be allocated by Policy E1.5). Therefore, Mr PJSR Hill and his family business are henceforth referred to as "the site owners" for the purposes of this comment.

The owners strongly supports the identification of the Woolfox employment allocation, which reflects the strategic merits of the site and its suitability to accommodate employment uses. However, to ensure that the policy is effective and positively prepared, it should be modified as follows:

- The site allocation boundary should be extended to reflect that shown on the Proposed Allocation Boundary Plan that has been submitted alongside these representations (ref. DE\_619\_001). The site size should be updated from 8.2ha to 19.11ha accordingly. That reflects and responds to the need / demand for a higher level of employment provision in the County and this location specifically.
- The proposed uses as contained in the allocation policy should be modified to refer to "*a range of employment uses*", reflecting the need for other employment uses aside from light / general industrial, and the opportunity at hand to create a thriving business area in this location.
- Allocation policy requirements A, C and D should be deleted to reflect the practicalities of the site's delivery.

**QUESTION 5: ATTACHMENTS**

Proposed Allocation Boundary Plan (ref. DE\_619\_101).

Woolfox Employment Area Placemaking Plan (ref. DE\_619\_52).

**QUESTION 6: IF YOUR REPRESENTATION IS SEEKING A MODIFICATION TO THE PLAN, DO YOU CONSIDER IT NECESSARY TO PARTICIPATE IN THE EXAMINATION HEARING SESSION(S)?**

Mr PJSR Hill and his family business ("the owners") are the sole landowner of the proposed employment allocation site at Woolfox (Policy E1.5). As set out in their representations, this site should form a key part of the spatial strategy, but modifications are required to ensure that Policy E1.5 is effective, positively prepared and sound. As the promoter of the site, it is essential that the owners are present to discuss that matter with the Council and the Inspector(s).