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Planning Policy  
Rutland County Council  
Catmose House, Catmose Street  
Oakham LE15 6HP

**Emailed only to: [localplan@rutland.gov.uk](mailto:localplan@rutland.gov.uk)**

Dear Sir/Madam

## **RUTLAND COUNTY COUNCIL REGULATION 19 (PRE-SUBMISSION) RUTLAND LOCAL PLAN CONSULTATION**

We presently provide representations on behalf of our Client, **De Merke Estates**, in response to the Council's "Pre-Submission Consultation" (Reg 19), which follows Rutland Council's earlier consultations (Call-for-Sites; Issues and Options; Preferred Options).

De Merke Estates land at "**Land at North West Oakham**" (previously known as "The Lookout" via previous promotions. The entire site/landholding has been previously submitted through the "Call for Sites" process and SA process being reviewed as "**Site ID 55 (A/B/C)**".

Nevertheless, this response has been prepared in objective terms, having regard to prevailing national planning policy and guidance, set out in the NPPF and the National Planning Policy Guidance (PPG). And these representations (inc the "general overview") focus more upon RCC's present "Vision" and "Spatial Strategy" – as opposed to the merits or otherwise of individual sites (allocated or non-allocated).

### **1. General Overview of RCC's Approach to Preparation of this Local Plan**

The present publication/consultation of this Local Plan has been rushed – it is therefore premature and fails to adequately properly provide for the objectives and achievement of long-term sustainable development. RCC itself has acknowledged that it is pressing ahead with the Local Plan presently, with the primary objective of avoiding the "much higher housing targets" (as referenced by the Leader in the Reg 19 LP Foreword) – outlined by the new Government and to be required in the soon to be published NPPF (anticipated by end of Dec 2024 – ie less than a month from the close of the present consultation).

These are not “Government housing requirements”, these are based upon a recognised methodology to help meet the acknowledged needs of communities for each LPA up and down the country. In rushing to “avoid such higher housing targets”, RCC is in fact rushing to avoid seeking to meet the actual “needs” of its residents. A “target” is very different to meeting the actual “needs” of a community, or a local planning authority – let alone a County Council.

RCC’s present Local Plan is based upon 123 dpa over its plan-period, in comparison to the new NPPF’s imminent (minimum) figure of 264 dpa, ie less than 50% of what is actually “needed” and should be properly “planned” for across the County.

The preparation of a Local Plan is also much more than simply “counting housing numbers”. RCC has unfortunately become overly focussed on its 5-yr housing land supply (HLS) and has been largely using this as its yardstick in measuring the success or otherwise of its planning functions. We recognise why this has become the political short-term focus of the Council, but it has already given rise to medium and longer term social and economic consequences for the County as whole, but perhaps more noticeably the decline of the County Town of Oakham.

Successful “planning” requires the entire raft of social community infrastructure to help drive the economic growth and success of an area. This would include the provision of new schools, doctors’ surgeries and leisure/recreation facilities – alongside that of new housing and employment growth. This has unfortunately not happened in RCC, in particular in Oakham – and the recent closure of the RCC-run Catmose Sports Centre is an unfortunate case-in-point of this.

Recent developments in Oakham have been largely “unplanned” and are the result of speculative, mostly small’ish, housing developments – many of which were the result of S78 Appeals. Whilst these have indeed contributed to RCC’s 5-yr HLS requirements, they have actually contributed very little to the local services and facilities needed within the County Town.

The greatest cry from existing local residents in Oakham is “*what about the schools*” and “*where are the doctors’ surgeries*” – none of which are being provided for by the new developments or being “planned for” by RCC.

Unfortunately this is due to the absence of proper “planning”, and instead RCC being in favour of simply “counting housing numbers”. There is an old adage: *if you fail to plan, you plan to fail*. Regretfully, this is now playing out in RCC and having a detrimental effect upon the present/future success of Oakham – and its role and function as the County Town.

The present Reg 19 Local Plan provides several references as the role/importance of Oakham and its County Town status, with the extract below being just one example of this:

**Rutland is home to two market towns – Oakham and Uppingham - of which Oakham is the larger with a population of approximately 13,457. Oakham has a range of education, community, health and leisure facilities. It is also a centre for employment and shopping, including a twice-weekly market and a mix of independent and country wide retailers. Uppingham has a population of about 4,797 with a more limited range of facilities, employment and shopping, and a weekly market.**

[Chapter 2, Spatial Characteristics]

And yet, the present Local Plan is actually “planning” to allocate very little in order to provide for the largest population in Rutland – with only a single residential allocation of 94No units and 2No employment allocations. No new schools, doctors’ surgeries/places or recreation/leisure facilities.

Instead, the largest residential allocation is being proposed on the edge of Stamford – 650No units – in possibly the furthest point possible from Oakham whilst still in RCC’s administrative area. Whilst this might meet the “administrative needs” of identifying housing numbers, it fails to meet any of RCC’s acknowledged “needs” – both socially and economically.

The largest population is in Oakham. The widest range of education, community, health facilities is in Oakham. The largest employment and retail areas are in Oakham. The greatest social housing need is by far in Oakham. And yet, RCC is proposing its largest housing allocation circa 15 miles away on the edge of Stamford – with specific reference to:

**It is intended now that any development on the Rutland part of a comprehensive Sustainable Urban Extension to Stamford should count towards Rutland's housing needs and so reduce the requirement for new housing elsewhere in Rutland.**

[Table 3 – Housing Requirement footnote]

Whilst RCC may be able “to claim” the resultant housing numbers, 650No units in this location will only serve to benefit the social and economic growth of Stamford:

- The economic output of its circa 1,500 residents will be spent in Stamford.
- The shops and services that will be sustained by the resultant residents will be those in Stamford.

So whilst RCC is seeing this as “a win” in its quest for housing numbers, the opposite is true in respect of meeting its actual “housing needs” and it will also give rise to unintended consequences when seeking to sustain the economic stability of Rutland’s own County Town – as this will all be lost to Stamford.

We therefore seriously question how the present Local Plan Strategy helps to deliver its vision and objectives, or the Council’s main Corporate Strategy and its 4No main priorities of:

- tackling the climate emergency
- creating a diverse and sustainable local economy
- supporting the most vulnerable
- providing good public services

The Council’s latest **Quarterly Performance Report**<sup>1</sup> (November 2024) and mid-year **Q2 Financial Report**<sup>2</sup> (November 2024) provide an overview of where its performance is currently “off-target”, with shortfalls in education and housing needs being the most prevalent. A few of RCC’s own observations are below:

**The number of Rutland residents in temporary accommodation due to homelessness remains higher than the Council’s target of six due to increased demand caused by higher private rental costs, as well as a lack of affordable and social housing. The Council has approved planning and allocated £1m in funding to affordable developments being built in Rutland, which will help families in temporary accommodation and those on the County’s housing register.**

**More than 100 new affordable homes are being delivered across five sites in Rutland between now and 2026, with 11 already complete this year. This is providing a mix of affordable housing for rent and affordable home ownership. Rutland County Council is currently supporting 17 people in temporary accommodation.**

**As things stand, the Quarter 2 forecast indicates the Council is heading for a net overspend of £2.3m on its budget, due largely to the fact that government funding for schools, known as the Dedicated Schools Grant (DSG), does not cover the full cost of Rutland’s school provision for children with special education needs and disabilities (SEND).**

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<sup>1</sup> [Read our latest performance update | Rutland County Council](#)

<sup>2</sup> [Council publishes mid-year financial report highlighting key budget pressures | Rutland County Council](#)

A residential allocation of 650No units, would generate provision of circa 200No much needed affordable housing units, opportunities for new education provision and other social infrastructure – all of which are desperately needed in Rutland. But rather than allocate such growth where it is actually needed in (ie in Oakham), it is instead being proposed 15 miles away on the edge of Stamford.

It is widely recognised that new development not only provides the main source for new (much needed) services and facilities, but helps stimulate/sustain the economic growth of an area. The economic output from 650No new dwellings on the edge of Stamford will be solely directed towards Stamford, and have a limited effect on the County Town (Oakham).

Such a strategy will only exacerbate RCC's present performance shortcomings and financial struggles highlighted in its own recent Quarterly Reports.

In having regard to future growth opportunities, the present Local Plan is proposing to pursue a similar (misguided) spatial strategy in its identification of 2No "Future Opportunity Areas" (St George's Barracks and land at Woolfox) – neither of which will help serve the role, function and prosperity of the County Town.

Before examining the Reg 19 Local Plan in detail, we would summarise this overview, with reference to the objectives of the "**Future Rutland Vision**" (2022) and **Local Plan Vision** (in part):

**The Future Rutland Vision aspires to ensure a thriving and sustainable County creating the right conditions for businesses to succeed and grow with places that are healthy, safe, connected and affordable to live in and which accommodate future population growth. This should be achieved in a way that protects and enhances the things that are unique and special to Rutland.**

And

**The market towns of Oakham and Uppingham will continue to thrive as vibrant destinations to shop, socialise and enjoy life – both for those who live locally and those who visit and contribute to the County's thriving local visitor economy. They will continue to be the main focus for additional housing and employment growth, while their role as business locations, service and cultural centres for the County will have been enhanced.**

Please rest assured that de Merke Estates whole heartedly supports the above objectives and vision! Whereas, the present Local Plan strategy, and indeed the future (with St George's and Woolfox), would seem to suggest to us an alternative strategy of:

- rush the publication of this Local Plan in order to provide for the least number of housing required by (123 vs 264 dpa) – ie focusing on “housing targets” as opposed to “actual needs” of its residents
- thereby providing the least required (in policy terms) of housing – and failing to meet the actual “needs” of its residents
- in areas where it is perceived to least affect its existing residents - both now (on the edge of Stamford) and in the future (St George’s and Woolfox)
- instead of areas where it is most needed (and most sustainable) at Oakham – in the furthest away locations
- the result of which would be the continued social and economic decline of Rutland’s County Town

## 2. **Regulation 19 (Pre-Submission) Local Plan**

### i) Chapter 2: Spatial Portrait

This sets out the spatial vision and strategic objectives, and outlines the main characteristics of Rutland in terms of geography, environment, demographics, economy and infrastructure as well as social and cultural matters. All of which reiterate the important role of the largest settlement of all – that of the Oakham, the County Town – and where all of the higher order services are located (ie secondary schools, hospital, GPs and dentists) – and the greatest proportion of retail and employment opportunities. It is also the most sustainable (inc public bus/rail public transport links) and should therefore be the primary focus for planned growth in this and any subsequent Local Plans.

This Chapter also highlights the important role/awareness of **Development in Neighbouring Areas**, with **Figure 2** indicating the scale of development in such neighbouring authorities. Some of the figures stated in Fig 2 are out of date, and do not reflect that of what is/will be required in the emerging NPPF.

This is particularly important in the consideration and application of the statutory “**duty to cooperate**” with neighbouring authorities. The accompanying “**Duty to Cooperate – Statement of Compliance**” (RCC, Oct 2024) advises that:

**The Council has followed a robust approach to meet the local housing needs for Rutland, including meeting affordable housing needs. The Council has engaged with its neighbouring authorities and as a result of those discussions, there is currently no requirement to meet any needs arising from neighbouring authorities in this plan period or vice versa. Rutland can meet its needs within its own administrative boundary.**

[Para 5.4]

**None of the other neighbouring [needs] (*sic*) (*authorities*) have raised any issues regarding the Duty to Cooperate and will confirm this by email.**

[Para 5.25]

Unfortunately this important document does not provide any evidence of such discussions, nor any confirmation or otherwise that the neighbouring authorities concur with RCC's position on this statutory obligation. Both in respect of the figures stated in Figure 2, but more importantly the emerging NPPF.

Moreover, the present absence of such agreements (with its neighbouring authorities) is surprising, given the extensive discussions that have been referred to by RCC (in its DoC Statement) in preparing this Local Plan.

This is important due to the strategic cross-boundary matters that surround Rutland County on all sides, and the (imminent) NPPF's increased importance being placed upon effective strategic planning across LPA boundaries<sup>3</sup>. This will not only include the present and future consideration of "unmet housing needs", but also wider key spatial issues in delivering strategic infrastructure and building economic and climate resilience – to ensure the delivery of sustainable growth.

In the light of the presently submitted (and available) information, we question whether RCC has adequately addressed its statutory obligations in respect of "**duty to cooperate**". This goes to the heart of the "soundness" of the Local Plan – and is our first **major objection**.

## ii) **Chapter 3: Vision and Objectives**

As previously stated in our overview to the Local Plan itself, de Merke Estates whole heartedly supports the stated **Local Plan Vision** and **Strategic Objectives**.

However, and in having regard to the NPPF (Section 3), we do not consider that the present **spatial strategy**, the accompanying "**evidence base**" and the draft Local Plan itself – is necessarily best placed to deliver on its own vision and objectives. For reasons already outlined in our overview, we do not consider that:

- The Plan has been prepared with the objective of contributing to the achievement of sustainable development
- The Plan has been prepared positively or aspirational  
[NPPF, para 16a, 16b]

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<sup>3</sup> NPPF, July 2024, para 24

The Draft Local Plan correctly recognises that: *The County Council does not deliver development, growth and change directly but through its planning function it has a key role in shaping development and change to ensure that it meets the County's long-term vision.* But as presently drafted, we have serious reservations about it achieving its own vision and objectives, as the Draft Local Plan would have unintended consequences as to the successful role and function of its County Town.

In having regard to the “tests of soundness”, we therefore **object** on the grounds that:

- a) it has not been **Positively prepared**
- b) it is not **Justified** – as it does not represent an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence (we explore this in more detail when having regard to the accompanying **Sustainability Assessment**);
- c) it is not **Effective** – as the stated Vision and Objectives will not be deliverable over the plan period; and
- d) it is not **Consistent** with national policy – choosing instead to rush to the present Reg 19 stage in order to avoid meetings it identified housing needs, and failing to have regard to present strategic cross-boundary planning objectives in seeking to ensure the delivery of sustainable development. [It is also failing against the extant NPPF]

iii) **Chapter 4: Climate Change**

de Merke Estates supports the aims and objectives of tackling the present **climate emergency**, and helping to reduce carbon emissions and minimise the impact of climate change on the lives of RCC residents and local businesses.

To this end, and to best achieve such aims and objectives, it is clear that the most sustainable location for the majority of planned future growth in the County should be at Oakham. The Council’s own **Sustainability Assessment (Settlement Assessment, Jan 2024)** concluded that Oakham (with Barleythorpe) scored the highest in the evaluation the relative sustainability merits of each settlement against each SEA theme.

In the light of the present Local Plan strategy, we consider it will “**not be effective**” in achieving the stated Climate Change aims and objectives.



### Policy CC8: Renewable Energy

We note, and do not object, to the Council's identification of "broad areas suitable for Large Scale Wind Energy Turbines", inc the western part of de Merke's landholding at NW Oakham (south of Mill Hill) – and the identification of its potential suitability for "medium to large wind turbines". In doing so, we question the inter-relationship between this designation and the wider conclusions of the Council's **Landscape Character Assessment** and **Settlement Sensitivity Assessment** – both of which we outline our objections to later in these representations.

#### iv) Chapter 5: Spatial Strategy

We consider the Spatial Strategy is **unsound** on a variety of levels – and therefore **strongly object** to many aspects of this Chapter of the draft Local Plan.

#### Policy SS1:

The Council has acknowledged that it is rushing this present Local Plan in order to "avoid having to meet higher housing targets". This singularly fails to have any regard to seeking to meet its own "housing needs" – especially those on its own housing register.

It is already failing to accord with the spatial planning objectives and meeting the acknowledged housing needs (inc affordable housing) of its residents with regard to the extant NPPF.

The draft NPPF (July 2024, Annex 1) introduced the concept of "transitional arrangements" for those LPAs where the difference between extant/emerging housing requirement is "no more than 200 dwellings" below the published relevant LHN figure. In the case of RCC, and whilst such transitional arrangements are yet to be finalised, the relatively small figures of 123dpa and 264dpa, means that this "difference" (of 141dpa) falls below this "200dpa" figure – albeit this is only in pure numerical terms.

The draft NPPF deals with all LPAs across England, with the majority having housing requirements vastly in excess of that being considered by RCC – and it is therefore not perhaps surprising how the "*below 200dpa*" came about – but this is a clear anomaly in the context of RCC and other LPAs with lower (than normal) housing requirements. If one considers this in proportional terms, RCC's present figure of 123dpa is less than half of that presently identified LHN figure (or more than 110% shortfall), which is an extreme under-provision in any assessment of housing provision to meet housing needs.

It is widely anticipated that this anomaly will be amended in the imminent NPPF, with reference to a proportional percentage figure, as opposed to a single (crude) numerical approach.

#### Policy SS4: Future Opportunity Areas

We **strongly object** to this Policy and the identification of these 2No areas presently: St George's Barracks and "land at Woolfox".

We do not necessarily object to the future development of either or indeed both of these areas in the long-term, but the correct place for such sites to be considered would be in the context of the next **Local Plan Review** – alongside the proper and comprehensive consideration of all "**reasonable alternatives**".

It is alarming (and **highly unjustified**) that the supporting text to this policy states:

**The Council is mindful of potential increases in the Local Housing Need for Rutland and neighbouring areas as set out in the Government's consultation on proposed reforms to the National Planning Policy Framework and other changes to the planning system.**

**There is potential for either or both sites to help meet future housing and economic development needs. In so doing, this would ease the pressure for future development on the edges of the County's towns and villages. However, there are considerable complexities in considering the future use and development of both sites. It is proposed that these matters can be explored in greater detail through the preparation of a separate masterplan for each site as either a separate Development Plan Document (DPD), or as part of an early review of the Local Plan.**

It is wholly premature and unjustified to be essentially "earmarking" both of these areas for future development to meet future LHN in Rutland – in the complete absence of any assessment of all "**reasonable alternatives**" presently.

The accompanying "**evidence base**" is silent on the inclusion of either of these locations in the Sustainability Assessment, as part of the present "reasonable alternatives". There has been no publication of "**future reasonable alternatives**", and yet this Local Plan is seeking to essentially "future-proof" both of these opportunities ahead of other potential opportunities – inc large-scale greenfield release at Oakham.

Such sites are “untested” – both in terms of “preferred location” and in comparison, to potential alternative growth options. The draft Local Plan recognises that such sites are “not presently allocated”, but that their suitability and deliverability could instead be demonstrated (or circumvented) in the subsequent preparation of separate Development Plan Document(s).

Whilst the present **Sustainability Assessment** does include both sites in its **SA Site Assessment (Technical Appendix 2)**, it does so only on an individual basis. However, and most importantly, the SA does not provide a comparison of either site against any other possible “reasonable alternatives” (in SA terms) to meet future LHN requirements – and therefore the present inclusion of both of these sites and Policy SS4 itself is **wholly unjustified** in policy terms.

In a review of the SA Site Assessment (Tech Appendix 2), it is also important to note that both the 2No sites (St. George’s and “land at Woolfox”) score less well in a comparison to large scale sites on the edge of Oakham. This is perhaps not surprising given the wide recognition of Oakham being the most sustainable location for growth, and yet these 2No sites are identified as “future opportunity areas” – without a full and comprehensive review of all reasonable alternatives to meet future LHN needs and the social/economic well-being of the County.

Furthermore, the accompanying “**Spatial Strategy and Settlement Hierarchy Report**” (August 2023) is also completely silent on the relative merits or otherwise of either St. George’s Barracks or “land at Woolfox” in the Council’s own assessment of its present or future spatial strategy. And yet, Policy SS4 has been inserted into the draft Local Plan without any technical substance, justification or proper evaluation of all other potential reasonable alternatives.

If the Local Plan is to progress, and in the absence of any published evidence base to support this Policy, then **Policy SS4** should be deleted in its entirety.

v) **Chapter 6: Housing**

Policy H1: Sites proposed for residential development

As previously indicated, de Merke Estates does not object to any of the proposed housing allocations *per se*, but rather how the present strategy and these sites/allocations will successfully meet the real aims and objectives of this Local Plan, and the recognised needs of its local residents and local economy.

The Policy H1 table indicates that only 30% of its housing growth is to be located at Oakham (820/2,705), and the vast majority of this growth (729 units out of 820) is the result of speculative unplanned and

uncoordinated applications. There has been very little proactive “planning” that has occurred or being proposed for the most sustainable and important settlement in the County.

Policy H1 (and its accompanying table) also highlights a significant mismatch between the lack of provision to meet acknowledged housing needs, in particular those in affordable need. The Council’s “**Housing Market Assessment**” (August 2023) consistently identifies that the largest requirement is in Oakham, and it is important to remember that new affordable units are only sought on sites of more than 10 units and then @ 30% provision. This is against the HMA’s own key findings that there is a need for **78 affordable homes per annum**<sup>4</sup> across Rutland.

The Council’s present housing delivery relies on a significant proportion of small sites, and below the threshold required to provide for affordable housing. It is therefore perhaps not surprising, and quite worrying, that RCC is falling woefully short of this recognised housing need (of 78No affordable dpa) and its own “target” of 40 affdpa, with the table below reflecting recent affordable housing delivery in RCC<sup>5</sup>:

|                         | <b>Rented</b> | <b>Affordable purchase</b> | <b>Total (Target 40)</b> |
|-------------------------|---------------|----------------------------|--------------------------|
| 2016/17                 | 6             | 0                          | <b>6</b>                 |
| 2017/18                 | 13            | 8                          | <b>21</b>                |
| 2018/19                 | 28            | 35                         | <b>63</b>                |
| 2019/20                 | 12            | 21                         | <b>33</b>                |
| 2020/21                 | 8             | 16                         | <b>24</b>                |
| 2021/22                 | 11            | 5                          | <b>16</b>                |
| 2022/23                 | 0             | 1                          | <b>1</b>                 |
| 2023/24                 | 0             | 0                          | <b>0</b>                 |
| 01 April – 30 Sept 2024 | 5             | 6                          | <b>11</b>                |

We include the above table with reference to draft Local Plan Policy H1’s table, as it highlights the clear shortcomings if one becomes too focused on simply “counting housing numbers” under the auspices of “planning”, whereas “proper planning” would focus on how best to meet and provide for recognised “housing needs”.

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<sup>4</sup> Rutland- Housing Market Assessment (Aug 2023, p.162)

<sup>5</sup> RCC Housing, homelessness and rough sleeping strategy 2025-2030 (November 2024, p.25)

vi) **Chapter 7: Economy**

de Merke Estates supports the provision of new employment allocations at Oakham, which will help to strengthen the important role and function of the County Town. Such allocations are welcomed, but they should be alongside properly planned housing allocations in order that the social and economic benefits can be realised in pursuit of sustainable development.

vii) **Chapter 8: Sustainable Communities**

The draft landscape policies (Policies SC1, SC2 and SC3) are all predicated and reliant upon the findings of the “**Rutland Landscape Character Assessment 2022**” and the “**Settlement Landscape Sensitivity Assessment 2023**”.

We do not concur with the findings of these landscape studies, and consider they have been overly cautious in their assessment/conclusions in certain circumstances – this is particularly the case in respect of the County Town of Oakham.

We therefore **object to Policies SC1, SC2 and SC3** as presently drafted.

viii) **Chapter 11: Infrastructure and Delivery**

de Merke Estates fully supports the Council’s opening statement of this Chapter, namely:

**It is important that growth proposals are supported by appropriate new and upgraded infrastructure to ensure the best possible impact on the social, economic and environmental well-being of the County. The effectiveness of the growth strategy in this Local Plan is dependent on the delivery of the necessary infrastructure in the right location and at the right time.**

However, we wish to highlight that it is unfortunately exactly the opposite of this that has happened in the unplanned speculative growth that has been allowed to come forward in Oakham over the past few years. And it is therefore perhaps not surprising that the local residents and business community are continually critical as to the absence of the necessary supporting infrastructure to support the social and economic needs of the County Town. Especially at a time when Rutland residents are already experiencing the highest council tax bills in England<sup>6</sup>.

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<sup>6</sup> [Where is the most expensive and cheapest council tax in England? | Daily Mail Online](#)

The present Draft Local Plan (Reg 19) spatial strategy will do little to rectify such shortcomings, nor ensure the delivery of much needed infrastructure. To this end, the accompanying “**Infrastructure Delivery Plan**” (HDH, October 2024) is a well-intentioned document that identifies many of the infrastructure shortcomings across the County and with reference to specific needs in specific settlements. However, **Table 16.1** provides a summary of the identified infrastructure tasks and associated costs – but no indication of how the identified “funding gaps” are to be catered for – and if to be achieved, will result in further Government funding being required (due to the absence of CIL and/or S106 funding – given the lack of new development where it is most needed).

In the absence of any major new development in the County Town, it is questionable how any of the presently identified infrastructure shortcomings will be rectified. We therefore object to this **Chapter and Policy INF1**, as it is unclear how “effective” the present strategy would be in the context of the “**tests of soundness**”.

ix) **Chapter 12: Monitoring and Review Framework**

We **object to this entire Chapter** as presently drafted.

Firstly, the present Local Plan **should not proceed**, as it is premature to a variety of key strategic considerations – not least the new/imminent NPPF.

If the Plan does proceed to Submission, it should not include any provision of the untested and unjustified “future opportunity areas” – any such future growth should be considered and assessed alongside “**all other reasonable alternatives**” in a **subsequent Local Plan Review** and its corresponding **Sustainable Assessment**. As presently drafted, the current corresponding evidence base provides absolutely no justification or technical support for the 2No “Future Opportunity Areas”.

All references to **St.George’s Barracks DPD** in Chapter 12 should therefore be deleted.

Similarly, no reliance should be placed upon “**Figure 11 – Housing Trajectory 2021-2041**”, which should **DELETE** the orange line of “**trajectory with Future Opportunity Areas**” – for the foregoing reasons of being untested and unjustified.

**Table 6 – Data for Housing Delivery** (Figure 11) should consequently **be deleted** and/or recalculated with the exclusion of any “potential additional supply from Future Opportunity Areas” (Policy SSA) (sic) – (Policy SS4).

### 3. Summary

Whilst the draft Local Plan correctly identifies Oakham as being the most sustainable location for new development, with the greatest range of existing job opportunities and higher order services, we consider the emerging Local Plan lacks vision and a lack of adequately “properly planning” for the County Town.

As presently drafted, and whilst we support the stated vision and strategic objectives of the Local Plan, we consider that it lacks the foresight and ambition for what should be a positively planned strategy for growth, for the most sustainable location in the County, over the next 15+ years.

It is therefore **unsound** – on a variety of levels:

- RCC has acknowledged the present Reg 19 LP is being rushed to avoid higher housing targets
- RCC is already failing to accord with the present NPPF<sup>7</sup> - inc lack of affordable housing
- The revised “targets” in the NPPF are a better reflection of “need”, as opposed to a simple numerical exercise
- The imminent NPPF’s LHN figures represent a 114% increase in what is presently being proposed by RCC
- The draft “transitional arrangements” should therefore not apply to RCC – an anomaly expected to be rectified in the imminent NPPF
- RCC has failed to demonstrate its statutory obligations in respect of “**duty to cooperate**”
- Such failings are exacerbated in the light of the increased requirements of strategic cross-boundary arrangements
- The draft Plan has not been “**positively prepared**” – almost the direct opposite – in seeking to provide for the “least amount of housing” (required in policy terms) and then proposing to locate such housing as far away from where it is most needed
- The Spatial Strategy is not “**justified**” – insofar as it disregards certain elements of the SA, and then seeks to rely upon a strategy (inc the identification of “future opportunity areas”) that has not been assessed in the SA – and the absence of a comprehensive evaluation of “**all reasonable alternatives**”
- The Plan will consequently not be “**effective**” in delivering on the stated Vision and Strategic Objectives it is setting out to achieve
- As presently prepared, the Spatial Strategy is pursuing less sustainable options

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<sup>7</sup> NPPF, Para 8: right types of land, being available in the right places and at the right time to support growth.

- This will unfortunately fail to meet recognised housing needs – both in terms of quantum and also location (ie too few houses and in the wrong location)
- This will consequently result in the continued social and economic decline of the County Town
- The present inclusion (and indeed reliance) on 2No “future opportunity areas” is premature at this stage – they are untested in any comparable evaluation of “all reasonable alternatives” (in SA terms) – and therefore entirely “unjustified” at this time
- Any consideration of future strategic growth within RCC to meet anticipated increased LHN should be undertaken as part of a Local Plan Review – inc “**all reasonable alternatives**” – to be comparatively appraised in a robust SA at that time

de Merke Estates is keen to proactively work collaboratively with RCC and the local community, in seeking to ensure a truly sustainable development is achieved on its landholdings at NW Oakham. This would be with the objective of agreeing a scheme that not only contributes towards the achievement of housing needs, but also meets the actual wider Vision and Strategic Objectives of the Plan (and RCC more generally).

### **Next Steps**

We trust that the information provided as part of these representations is clear and provides a helpful way forward in the consideration of the present Reg 19 Local Plan.

If the draft Reg 19 Local Plan does progress to Submission in its present form, please be advised that this is our formal request to participate at the future Examination and in all of the above related Hearing sessions. Please also be advised that de Merke Estates will be represented by leading Kings Counsel.

We would very much welcome the opportunity of discussing this further with you, your Local Plan Team and wider RCC colleagues. Should you require any further information, please feel free to contact me.

*Yours sincerely*

*Huw Edwards*

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