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# Representations to the Rutland Local Plan

Regulation 19 Consultation (October 2024)

Land at Stamford Road, Oakham

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Society of Merchant Venturers

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## Executive Summary

These representations have been prepared on behalf of the Society of Merchant Venturers (SMV) in response to the Rutland Local Plan Regulation 19 Consultation.

The SMV is a private organisation, incorporated under the Royal Charter, that is the endowment trustee of the St. Monica Trust, a registered charity that owns and manages land within the charity's ownership at Oakham. The income generated from the holding is used to help fund the work of the charity, and any proceeds generated are similarly held for the benefit of the charity.

The SMV control land to the south east of Oakham, including Land south of Stamford Road, which has been promoted through the preparation of the emerging Rutland Local Plan.

Oakham is identified in the draft Local Plan as the main town in Rutland and the focus for development over the Plan period. 'Land south of Stamford Road' is allocated for residential development for up to 94 dwellings under Policy H1.1 of the draft Local Plan. A site location plan for 'Land south of Stamford Road' is enclosed at Appendix 1.

It is welcomed that 'Land south of Stamford Road' is a draft Local Plan allocation (Policy H1.1). The site is in a sustainable location and offers the opportunity to create a new gateway to Oakham and to support the Council's identified local housing needs and strategic objectives. The accompanying Vision Document (Appendix 2) with emerging Framework Masterplan detail how development could be accommodated on the site and how the proposed allocation could be delivered.

A number of changes are recommended to draft Local Plan policies in order to ensure the soundness of the Plan, with reference to paragraph 35 of the NPPF (2023). This includes a number of minor amendments to the draft site allocation of Land south of Stamford Road (Policy H1.1), including in relation to the 'key principles' and application submission requirements.

## 1. Introduction to Representations

### 1.1. Introduction

- 1.1.1. This report has been prepared on behalf of the Society of Merchant Venturers ('SMV') in relation to the Rutland Local Plan Regulation 19 Consultation. This report responds to this consultation and the supporting evidence base.
- 1.1.2. The SMV is a private organisation, incorporated under the Royal Charter, that is the endowment trustee of the St. Monica Trust, a registered charity that owns and manages land within the charity's ownership at Oakham. The income generated from the holding is used to help fund the work of the charity, and any proceeds generated are similarly held for the benefit of the charity.
- 1.1.3. The SMV control land to the south east of Oakham, including Land south of Stamford Road, which has been promoted through the preparation of the emerging Rutland Local Plan. 'Land south of Stamford Road' is allocated for residential development for up to 94 dwellings under Policy H1.1 of the draft Local Plan. A site location plan for 'Land south of Stamford Road' is enclosed at Appendix 1.
- 1.1.4. 'Land south of Stamford Road' (ref. H1.1) is located to the south east of Oakham and is bounded to the north by Stamford Road, the east by Burley Park Way Bypass and to the west by residential dwellings along Catmose Park Road.
- 1.1.5. Whilst the site is relatively flat, the site gently slopes away from the northern boundary towards the watercourse at the site's southern boundary. A mature tree belt runs along the entire southern boundary. Development of the site provides opportunities for the enhancement of wildlife corridors, footpath and cycle links, local areas of play space and provision of affordable and market housing. The site is relatively unconstrained, albeit proposals would be sensitively designed to respect the Conservation Area located to the west of the site.
- 1.1.6. The site therefore has potential to accommodate a sustainable high quality development that responds to its surroundings and context, including a range of housing and public open space located close to existing facilities.
- 1.1.7. Our response to the consultation seeks to assist in informing the final stages of the Rutland Local Plan. Our response is structured according to the relevant policies contained within the Regulation 19 draft Local Plan with reference to the supporting evidence base documents.

## 2. Policy CC1 (Supporting a Circular Economy)

### 2.1. Introduction

2.1.1. Policy CC1 aims to support development proposals that will contribute to the delivery of circular economy principles. The Policy requires proposals to demonstrate that the approach to site waste management and construction waste will be addressed following the waste hierarchy together with the principles of Refuse, Reduce, Reuse, Repurpose, Recycle.

### 2.2. Response

2.2.1. The broad principles of this policy are supported and align with the NPPF (2023) (Paragraph 157). However, the wording of the policy is focused more on waste management and construction waste. Whilst the supporting text (page 28) briefly sets out 'circular economy principles', these are not addressed within the policy itself. If this policy is seeking to address the circular economy design principles, the policy should also relate more to the design of the buildings and how to ensure they are reused and adapted, based on appropriate evidence.

2.2.2. In addition, the policy states that a statement should be provided setting out the '*approach to site waste management and how construction waste will be addressed*'; however there is no guidance provided regarding the expected scope or level of details to be provided, and any distinction between the level of detail required for different types of applications (i.e. full or outline applications). It is considered that the level of detail provided should be proportionate to the type and scope of application, to ensure consistency and certainty in implementing the policies, for instance excluding details of construction techniques and waste avoidance measures at the outline stage. This should be clarified through updates to the supporting text and the Council's planning application validation guidance.

### 2.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

*"...All developments (with the exception of householder applications for extensions and alterations) should be accompanied by a statement **within the Design and Access Statement** setting out their approach to **addressing circular economy principles**. **Site waste management and how construction waste will be addressed following the waste hierarchy together with 5 Rs of waste management: Refuse, Reduce, Reuse, Repurpose, Recycle.**"*

The submission requirements should be clarified through updates to the supporting text and the Council's planning application validation guidance.

### 3. Policy CC3 (Resilient and Flexible Design)

#### 3.1. Introduction

3.1.1. Policy CC3 requires new development to be future proofed by being designed and constructed to be *'resilient and flexible to future change'*.

#### 3.2. Response

3.2.1. The broad principles of this policy are all supported and align with the NPPF (2023) (Paragraph 159).

3.2.2. However, any duplication with other policies should be avoided, in line with Paragraph 16 of the NPPF (2023). For example, there appears some crossover and repetition of the requirements in Policies CC14 and CC1 under criteria b) and e) of Policy CC3.

3.2.3. In addition, whilst the overall acknowledgement to provide an Energy Statement 'commensurate with the scale and type of development proposed' is noted, this requirement is vague and requires further clarification regarding the expected scope or level of details to be provided, and any distinction between the level of detail required for different types of applications (i.e. full or outline applications). It is considered that the level of detail provided should be proportionate to the type and scope of application, for instance excluding details of energy efficiency measures and overheating risk mitigation at the outline stage. This should be clarified through updates to the supporting text and the Council's planning application validation guidance.

#### 3.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

*"In order to ensure new development is resilient and flexible to future change, developers should set out in an Energy Statement (that is commensurate with the scale and type of development proposed) how the following have been considered in the design of their proposals:*

*a) the design of the development minimises and prevents overheating and avoids the need for air conditioning systems;*

~~*b) the design of the development has assessed flood risk and integrated mitigation measures in line with Policy CC14;*~~

*c) the design of the development has assessed and responded to any identified need to mitigate risks related to wind exposure (including risks to occupant safety, occupant amenity, building integrity, and safety in the immediate surroundings);*

- d) the proposal is flexible to future social, economic, technological, and environmental requirements in order to make buildings both fit for purpose in the long term;*
- e) ~~minimising future resource consumption in the adaptation and redevelopment of buildings in response to future needs with reference to the Circular Economy set out in Policy CC1, and;~~*
- f) the potential to incorporate a green roof and/or walls to aid cooling, add insulation, assist water management and enhance biodiversity, wherever possible linking into a wider network of green infrastructure.*

The submission requirements should be clarified through updates to the supporting text and the Council's planning application validation guidance.

## 4. Policy CC4 (Net Zero Carbon (Operational))

### 4.1. Introduction

4.1.1. The policy requires that all development proposals should provide ‘the maximum generation of renewable electricity as practically and viably possible on-site (and preferably on-plot)’. The policy also requires proposals to be supported by an Energy Statement.

### 4.2. Response

4.2.1. The broad principles of this policy are supported and align with the NPPF (2023) (Paragraph 159). However, whilst the principle of on-site generation is broadly accepted and is consistent with the NPPF (2023), the policy must incorporate additional flexibility to address site specific circumstances where there are opportunities for renewable generation adjacent or very close to a site, allowing a direct connection to the site. The Council must ensure there are full resources to enable site specific circumstances around energy provision to be properly assessed to pragmatically enable the most appropriate option for a particular site to be considered and progressed.

4.2.2. Whilst the overall aspirations of the policy are understood and broadly accepted, the detail within the policy is not clear. There is no definition of ‘net zero carbon’ referred to in the policy which may be misleading, despite full definitions being included within the evidence base reports. This should therefore be explicitly set out within the emerging Local Plan, alongside details on methodology and expectations to ensure there is certainty around implementation.

4.2.3. SMV agrees with the drive to generate as much energy as possible on site to offset energy use. However, the current draft policy ignores the fact that solar energy generation, for example, rarely matches energy demand at the time it is produced, therefore leading to excess energy generated that is not consumed on-site. For residential schemes this is especially apparent, where occupants are often out during the day (when energy is being generated but not consumed) and at home during the morning and evening (where it is being consumed but not generated). Solar energy production is at its highest during the middle of the day, in summer; whilst no energy is generated outside daylight hours and only small quantities are generated during winter. This is different to how most occupiers use energy, with more energy consumed during the cold months and often outside daylight hours to provide heating and lighting. This mismatch between consumption and generation leads to excess energy being generated during certain times of the year (summer) and more energy being consumed during other times of the year (winter). This will certainly be the case for the proposed development at Stamford Road.

4.2.4. The excess energy produced by a renewable installation can either be exported back to the grid where it can be used by other consumers or curtailed. Curtailment effectively wastes the energy generated. The extent to which excess power can be exported to the grid is dependent on the available capacity in the local grid, which is determined and managed by the local distribution network operator.



- 4.2.5. If for example, PV arrays are sized to generate as much power as is consumed onsite over the course of a year without sufficient grid export capacity, power generated on site will be wasted due to curtailment. This creates additional wastage due to the embodied carbon and resources used to produce superfluous PV panels.
- 4.2.6. Furthermore the policy must ensure it is aligned with the Written Ministerial Statement made on 13 December 2023 entitled, 'Planning – Local Energy Efficiency Standards Update'.
- 4.2.7. The requirement to have independently verified 'as built' calculations lacks detail on what type of organisation would be qualified to undertake this, and as such should be removed, although the need to provide updated energy performance calculations is supported and will lead to more robust and deliverable net zero carbon solutions.

### 4.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

*"All development proposals ~~and all residential development proposals~~ should provide for the maximum generation of renewable electricity as practically and viably possible on-site (and preferably on-plot, **subject to export capacity being available, onsite consumption being maximised and design aspirations being met**).*

*Proposals supported by an Energy Statement should cover:*

- a) The submission of design stage estimates of energy performance **and carbon dioxide emissions**;*  
*and*
- b) Prior to any property being occupied, the submission of updated, ~~accurate and independently verified~~ 'as built' calculations of energy performance **and carbon dioxide emissions**."*

## 5. Policy CC6 (Water Efficiency and Sustainable Water Management)

### 5.1. Introduction

- 5.1.1. Policy CC6 requires all new developments to minimise impact on the water environment and sets out water efficiency standards for all new homes. It also sets out principles for sustainable water management.

### 5.2. Response

- 5.2.1. The approach to reducing water consumption is broadly supported and the policy aligns with Building Regulations. However, it is considered that specific reference within the policy to compliance with Building Regulations is unnecessary and should be deleted to avoid duplication of policies, having regard to paragraph 16 of the NPPF (2023). In addition, it is questioned whether it is necessary or justified to 'encourage' increased water efficiency standards of 85 litres per person per day beyond Building Regulations. Appropriate flexibility should be allowed for in order to take account of site-specific circumstances where specific elements of the policy requirements may not be appropriate.
- 5.2.2. The overall proposed approach regarding water management also aligns with the NPPF (2023). However, the policy should avoid unnecessary reference to Policy CC14 and clarify further that the stated measures are considered unless these measures are impractical or unfeasible for the development proposed. For example, with regards to the third bullet point, green walls are not generally considered appropriate for residential development, and green roofs would only be considered appropriate for any new buildings which have flat roofs.

### 5.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

*~~"In order to minimise impact on the water environment, all new developments should demonstrate that they are water efficient, incorporating water efficiency measures where practically viable and feasible. All new dwellings should achieve the Optimal Housing Standard of not exceeding 110 litres per day per for water efficiency as described by Building Regulation G2. Proposals that go further than this (to, for example, 85 litres per day per person or other relevant best practice target set by the building industry such as the RIBA Climate Challenge) will be particularly encouraged."~~*

### Water Management

~~In addition to the wider flood and water related policy requirements (Policy CC14), a~~ **All** development comprising new buildings:

- within their curtilage, outside hard surfacing (such as driveways, parking areas, hardstanding, patios and paths must ensure such surfacing is permeable (unless there are technical and unavoidable reasons for not doing so in certain areas);
- with outside soft landscaping, should consider the incorporation of native drought resistant plants in private gardens, communal areas, and any proposed public green spaces whilst recognising the importance of enhancing biodiversity in accordance with Policies EN3 and EN7;
- should consider the potential to incorporate a green roof and/or walls (for biodiversity, flood risk and water network benefits, and unless such roof space is being utilised for photovoltaic or thermal solar panels in accordance with Policy CC2) **unless this is impractical or unfeasible**; and
- which is residential, and which includes a garden area, must include a rain harvesting water butt(s) of minimum capacity of 200l, connected to a downpipe, **unless this is impractical or unfeasible in which case the size of the water butt should be maximised for the property.**

## 6. Policy CC13 (Provision for Electric Vehicle charging and Electric Bike parking)

### 6.1. Introduction

6.1.1. Policy CC13 sets out requirements for the provision of electric vehicle charging and electric bike parking in new development proposals.

### 6.2. Response

6.2.1. The policy requires that applications that include the provision of parking spaces will be required to meet the requirements set out in Building Regulations Part S (or successor) and that charging points should be located to allow for easy and convenient access from the charge point. Building Regulations Part S requires that each dwelling is provided with an electric vehicle charge point. The overall approach to meet the requirements set out in Building Regulations Part S aligns with paragraph 116 of the NPPF (2023) (which requires developments to be designed to enable charging of vehicles in safe, accessible and convenient locations) is considered appropriate. However, it is considered that specific reference within the policy to compliance with Building Regulations is unnecessary and should be deleted to avoid duplication of policies, having regard to paragraph 16 of the NPPF (2023).

6.2.2. The policy also requires appropriate provision for *'secure and covered parking for mobility scooters and bicycles (including e-bikes) which are large and heavy to bring into premises'*. There is however no further details provided within the policy or supporting text to clarify the meaning of 'appropriate provision' and how this will be determined. Whilst Appendix 5 (Parking Standards) of the draft Local Plan sets out cycle parking standards and 'powered two-wheeler parking standards', this is not referenced within Policy CC13 itself or the supporting text and therefore further clarification is required. The reference to 'large and heavy to bring into premises' is also unclear and should be deleted.

### 6.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

~~"All applications that include provision of parking spaces will be required to meet the requirements set out in Building Regulations Part S (or successor)..."~~

~~"...In addition, appropriate provision should be made for secure and covered parking for mobility scooters and bicycles (including e-bikes) which are large and heavy to bring into premises in accordance with the Council's parking standards (Appendix 5)."~~

## 7. Policy CC14 (Flood Risk)

### 7.1. Introduction

7.1.1. Policy CC14 seeks to reduce the risk of flooding and states that all development proposals will be considered against the requirements of the NPPF, including application of the sequential test and, if necessary, the exception test.

### 7.2. Response

7.2.1. The overall approach set out in Policy CC14 relating to flood risk and drainage aligns with the provisions of the NPPF (2023). It is recommended that the policy also includes reference to national Planning Practice Guidance, which includes further guidance in relation to application of the sequential test and exception test, in order to ensure that the application of Policy CC14 fully aligns with up to date national planning policy.

7.2.2. With regards to part b of Policy CC14, it is important that the application of the sequential and exception test aligns with paragraph 172 of the NPPF (2023) which states that, *'Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again.'* The application of the sequential and exception tests should also take into account the layout of development within the site boundary in steering new development to areas with the lowest risk of flooding.

### 7.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

*"To reduce the risk of flooding, all development proposals will be considered against the requirements of the NPPF **and PPG**, including application of the sequential test and, if necessary, the exception test. Where appropriate development proposals should demonstrate:*

- a) that the development does not place itself or other land or buildings at increased risk of flooding;*
- b) through the application of the sequential and exception test, as well as the guidance set out in **the NPPF and PPG**, development is located in areas of the lowest flood risk **within the application site...**"*

## 8. Policy SS1 (Spatial Strategy for New Development)

### 8.1. Introduction

- 8.1.1. Policy SS1 sets out the spatial strategy and outlines where future new development will be focused in Rutland.
- 8.1.2. Provision is made to deliver *‘at least 123 dwellings per annum (2460 over the 20-year period 2021-2041)’* with the majority of new development focused at Oakham and Uppingham. The supporting text to Policy SS1 explains that, in order to achieve the Future Rutland Vision, *‘the spatial strategy identifies that Oakham and Uppingham as the county’s towns, will continue to be the key locations for new development and change over the plan period.’*

### 8.2. Response

#### Housing requirement

- 8.2.1. Paragraph 61 of the NPPF (2023) is clear that, *‘To determine the **minimum** number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an **advisory starting-point** for establishing a housing requirement for the area’* [our emphasis]. It is notable that these provisions are further strengthened in the draft NPPF (July 2024).
- 8.2.2. The proposed housing requirement of at least 123 dwellings per annum, set out at Policy SS1, seeks to meet the minimum housing requirement set out in the current standard methodology and therefore generally aligns with the provisions of paragraph 61 of the NPPF (2023).
- 8.2.3. Paragraph 67 of the NPPF (2023) however explains that, *‘...the requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment...’*
- 8.2.4. Notably the Housing Market Assessment (HMA) (2023) considers whether there is a need to plan for additional housing in the county. It is noted that the HMA assesses overall housing needs across the county based on the latest NPPF and PPG and considers connections with the neighbouring authorities (Peterborough, South Kesteven, Melton and South Holland). The HMA (2023) notes that the current Standard Method outputs, based on 2014-based projections, equate to *‘household growth of 93 per annum and an uplift for affordability of 32%’*. However, based on an updated trend-based projection, the HMA (2023) identified *‘household growth of around 124-167 per annum’*. The HMA (2023) (paragraph 21) therefore concludes that *‘the Standard Method housing need should be considered by the Council as very much a minimum figure with a range of different projections typically (but not universally) pointing to a higher figure’*.

- 8.2.5. In addition, Figure 3 of the HMA (August 2023) highlights that there is a net estimated need for 78 affordable housing units per annum across the Plan period. The Assessment confirms that *‘the level of affordable need does suggest the Council should maximise the delivery of such housing at every opportunity’*.
- 8.2.6. It is noted that the Sustainability Appraisal (SA) (October 2024) assesses three different scales of growth, including the current proposed level of 123 dwellings per annum, as well as higher levels of 160 and 210 dwellings per annum. Notably the SA states that 160 dwellings per annum *‘reflects current delivery levels in Rutland’* and, with reference to 210 dwellings per annum, states that, *‘higher housing numbers could be delivered in Rutland through the Local Plan to support economic growth in the county’*.
- 8.2.7. The proposed new standard method, published alongside the draft NPPF (July 2024), significantly increases Rutland’s local housing need to 264 dwellings per annum. This is a substantial 114% increase.
- 8.2.8. The draft Local Plan makes several references to, *“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.”* The SA (October 2024) adds that, on this basis, *“it is likely that Rutland County Council will commence an early review of the new Local Plan (once adopted) in order to appropriately plan for additional growth identified through the revised housing method.”*
- 8.2.9. Whilst this approach is acknowledged, given the Council’s evidence base (including the HMA (2023) and identified affordable housing needs) and the direction of emerging national planning policy, it is likely to be important for an early review to be undertaken as proposed. It is also important that the Local Plan fully facilitates and supports the delivery of identified sites to help meet local needs.

### Spatial strategy

- 8.2.10. The strategy to focus the majority of development towards the market towns of Oakham and Uppingham through allocated sites and windfall development is strongly supported.
- 8.2.11. This approach reflects the Council’s evidence base, including the SA (October 2024) and Spatial Strategy and Settlement Hierarchy Background Paper (August 2023), which states that approximately 40% of the County’s population live in Oakham and Uppingham, and explains that *“Oakham... has a good range of education, community, health and leisure facilities and is a centre for employment and shopping...”*
- 8.2.12. This approach will also help to achieve the Local Plan Vision (page 13), which is clear that, *“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.”*
- 8.2.13. Given the need to plan for additional housing (as explained above), growth should be focussed at the most sustainable settlements and a positive approach should be taken towards development at Oakham.

8.2.14. As referred to below, Land south of Stamford Road at Oakham is allocated for development under Policy H1.1 and will make a meaningful contribution to delivering the Spatial Strategy in the early years of the Plan period. It is noted that 'SS1 – Planned Limits of Development', shown on the draft Policies Map, has been amended accordingly to include Land south of Stamford Road.

### 8.3. **Summary**

With reference to paragraph 35 of the NPPF (2023), in order to ensure the soundness of the Plan, it is important that the Local Plan fully facilitates and supports the delivery of identified sites to help meet local needs. It is acknowledged that an early review may also be required.



## 9. Policy SS2 (Development within Planned Limits of Development)

### 9.1. Introduction

9.1.1. Planned Limits of Development (PLDs) are shown on the draft Policies Maps at the two market towns of Oakham and Uppingham and at 21 Large Villages identified in the Spatial Strategy. Policy SS2 states that proposals for development within the Planned Limits of Development (PLD) will be supported in principle. In addition, Policy SS2 states that development on sites immediately adjacent to PLDs may be permitted to maintain a sufficient supply of housing land, provide infill or redevelopment, or to support local business and community needs.

### 9.2. Response

9.2.1. The overall approach to support the principle of development within the identified PLD is supported.

9.2.2. The PLD have been drawn at the most sustainable settlements in the County, including Oakham, as set out at Policy SS1 based on the Spatial Strategy and Settlement Hierarchy Background Paper (August 2023). As set out above, given the need to plan for additional housing, growth should be focussed at the most sustainable settlements and a positive approach should be taken towards development including at Oakham. Ensuring an adequate supply of housing sites at Oakham, particularly those in single ownership such as Land south of Stamford Road, that can be delivered quickly, will be important to meet and respond to local housing needs.

9.2.3. It is noted that 'SS1 – Planned Limits of Development', shown on the draft Policies Map, has been amended accordingly to include Land south of Stamford Road, which is allocated for development under Policy H1.1 and will make a contribute to delivering the Spatial Strategy and Local Plan Vision.

9.2.4. Minor modifications are however required to Policy SS2 in order to avoid unnecessary duplication of policies (based on Paragraph 16 of the NPPF (2023)). This includes the somewhat contradictory reference made to proposals being 'in accordance with all relevant Local Plan policies will be supported in principle', as well as the references made to development being 'sensitive to its surroundings' and to highways impacts.

9.2.5. The flexibility and allowance for development at additional sites adjacent to the PDL is acknowledged, particularly where required to maintain a sufficient housing land supply. This is likely to be important given the potential future increase in local housing needs as referred to above. However, it is important that this approach is not taken at the expense of supporting development at identified sites within PDL. As referred to above, it is recommended that the Local Plan seeks to plan for additional housing beyond the current LHN requirement. The Council should therefore plan positively for housing development at its most sustainable settlements in all circumstances in order to ensure a healthy supply of housing sites coming forward in the most appropriate places.

### 9.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

*~~“Proposals for development within the Planned Limits of Development (PLDs) indicated on the Policies Maps, which are in accordance with all relevant Local Plan policies will be supported in principle...~~*

*~~In all cases it must be demonstrated that the development is sensitive to its surroundings and will not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).”~~*

## 10. Policy H1 (Sites Proposed for Residential Development)

### 10.1. Introduction

- 10.1.1. Policy H1 provides a breakdown of the Local Plan housing requirement and sets out the sites identified for residential development. Provision is made for a total of 2,705 new dwellings over the Plan period of 2021-2041 to meet the housing requirement of 123 dwellings per annum with an additional 10% flexibility allowance.
- 10.1.2. At Oakham, there is a minimum requirement of 820 dwellings with a residual requirement over the Plan period of 91 dwellings, based on completions and commitments of 729 dwellings. Land south of Stamford Road (H1.1) is proposed for allocation at Oakham for 94 dwellings to meet the residual requirement.

### 10.2. Response

- 10.2.1. The overall approach to identifying sites for residential development to meet the County's identified housing needs based on the spatial strategy is supported.
- 10.2.2. The approach to including a 10% flexibility allowance is also supported given the need to plan for housing beyond the current LHN requirement (as referred to above, based on the Council's evidence base and the clear direction of emerging national planning policy). As set out in the supporting text (page 85), it is important that ongoing monitoring of housing supply is undertaken to ensure that sufficient housing is being delivered to meet the identified housing requirement. It is noted that the draft Local Plan also acknowledges that an early review is likely to be required. It is however important that the Local Plan fully facilitates and supports the delivery of current identified sites to help meet local needs.
- 10.2.3. The proposed allocation of Land south of Stamford Road for residential development is supported. Further comments are provided in relation to the proposed site allocation under Policy H1.1 below.
- 10.2.4. Further clarification is recommended in the policy wording, to reflect the supporting text, to state that the site capacity figures are estimates based on applying a standard density of 30 dwellings per hectare.

### 10.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

*“...**The potential** site capacity is ~~calculated~~ **estimated** on the basis of **a standard density of 30 dwellings per hectare, based on a net developable area** ~~and are therefore potential figures.~~”*

## 11. Policy H1.1 (Land south of Stamford Road)

### 11.1. Introduction

11.1.1. Policy H1.1 details the proposed allocation of Land south of Stamford Road for an indicative capacity of 94 dwellings including a minimum of 30% affordable housing. The policy sets out 11 'key principles' (relating to trees, design, landscape, heritage, access, sustainable travel, drainage, housing mix, self-build, play provision and health) and details application submission requirements.

### 11.2. Response

11.2.1. The proposed allocation of Land south of Stamford Road is fully supported. The SMV are committed to continuing to work closely with the Council through the preparation of the Local Plan to secure an allocation and to subsequently deliver development at this site.

11.2.2. The accompanying Vision Document (Appendix 2) with emerging Framework Masterplan detail how development could be accommodated on the site and how the proposed allocation could be delivered. As set out in the Vision Document (Appendix 2), the development of the site offers the opportunity to create a new gateway to Oakham from the east, forming a comprehensive and integrated extension to the town, which supports the Council's Local Plan Vision and Objectives.

11.2.3. Notwithstanding the above, below we set out comments in relation to the detailed criteria of Policy H1.11 to ensure the soundness of the plan..

#### Housing provision

11.2.4. Policy H1.1 specifies that the site will deliver '29 affordable homes / 65 market homes', based on 'indicative capacity 94' and 'minimum 30% affordable housing'

11.2.5. Whilst the SMV supports delivery of 30% affordable housing, given that the total site capacity is 'indicative' and subject to detailed design, it is recommended that the specific reference to '29 affordable homes / 65 market homes' is deleted and refer only to a percentage of affordable housing.

#### Key principles

11.2.6. Policy H1.1 states that, '*The proposed development should be designed to incorporate the following key principles within the layout...*' and then sets out 11 criteria a) to k) as referred to below. Given that not all of the criteria a) to k) relate directly or only to the layout of development, it is recommended that 'within the layout' is deleted.

'a) Retain and enhance all trees within the site and boundary hedgerows to contribute to the wider network of green corridors'

11.2.7. The requirement to 'retain and enhance' all trees and boundary hedgerows within the site is not considered to be practical or feasible and goes beyond the NPPF (2023). For example, some of the boundary hedgerow will need to be removed to facilitate access into the site and some trees within the site may require removal to achieve the development. Furthermore, there is no requirement in national planning policy to justify a requirement to 'enhance' existing trees. To ensure the policy is justified and consistent with national policy, it is recommended that the wording is amended to require the retention and safeguarding of trees where possible with planting to mitigate any loss.

*'c) Ensure the layout and detailed design including landscape mitigation measures alongside Stamford Road enhances the settlement edge and the wider setting of the Conservation Area and preserves the distinct openness along Stamford Road'*

11.2.8. Whilst the proposed residential development of the site offers the opportunity to create a new gateway to Oakham and 'enhance the settlement edge', the requirement to 'enhance...the wider setting of the Conservation Area' is not considered realistic or justified based on the development of the site and does not align with the NPPF (2023). Instead the development should be required to 'conserve' the wider setting of the Conservation Area. Notably, whilst the site is located adjacent to the Conservation Area, it does not form part of it and does not contribute to its character or significance in a meaningful way.

*'d) Ensure the layout takes account of the Cordon Sanitaire in the north-east corner of the site'*

11.2.9. As set out in our previous Regulation 18 representations (and detailed in Appendix 3), correspondence with Anglian Water has confirmed that a 250m cordon sanitaire would suffice for the Oakham Sewage Treatment Works and therefore this buffer would no longer impact upon Land south of Stamford Road or its developable area (as illustrated in the accompanying Vision Document (Appendix 2)). Accordingly, this principle is superfluous and should be deleted.

*'e) Ensure appropriate access solution to avoid conflict with Sculthorpe Close opposite and the junction of A6003 with A606 and that highway mitigations measures are provided'*

11.2.10. It is proposed that the site is accessed from the B640 Stamford Road, including an appropriate stagger distance to Sculthorpe Close in line with guidance, and with emergency access and pedestrian / cycle access provided to the north east. Previous assessment work undertaken by Evoke, and shared with the LPA, has shown that the site will not have a material impact on the operation of the highway network. There is therefore currently no justification or evidence that highway mitigation is required. On this basis, it is considered that the criteria should be amended to refer to 'any highway mitigation measures required...'.

11.2.11. There also minor typographical errors in criteria e) which require amending for clarity.

*'f) Provide safe, direct and convenient footway and cycleway connections through the site and to the town centre. This is likely to include a 3m wide shared footway/cycleway facility along the Stamford Road frontage, plus public transport improvements as a minimum.'*

11.2.12. It is currently proposed that the existing footway along Stamford Road is widened to 2.5m – 3m to comprise a shared footway/cycleway along the site frontage to tie in with existing infrastructure on Burley Park Way. This therefore appears to broadly reflect the policy requirements, however it is requested that the policy wording is amended to reference a 2.5-3m shared footway/cycleway and clarify that reference to the 'Stamford Road frontage' refers to the site boundary only.

11.2.13. With regards to public transport, bus stops are located on Stamford Road approximately 370m east of the site (serving the 9 and 185 daily routes to Stamford, Casterton School and Stamford College) and a wider range of more frequent services are accessible within Oakham Town Centre which can be accessed via pedestrian / cycle routes. On this basis, and given that the policy does not define specific requirements (referring to 'likely to include...'), it is considered that the requirement for 'public transport improvements as a minimum' should therefore be amended to 'supporting public transport improvements as appropriate'.

*'h) Provide an appropriate mix of housing choices which reflect the mix set out in the most up to date SHMA including 30% of the site capacity as affordable homes (a target of 24 homes)'*

11.2.14. The use of the SHMA to inform the housing mix of development is acknowledged; however, it is important that this is not applied in isolation and that there is some flexibility applied to allow for up-to-date site-specific circumstances to be taken into account. This is important to give potential developers the ability to react to changes in market demand and other relevant evidence.

11.2.15. In addition, as referred to above, the specific reference to 24 affordable homes should be deleted given that the total site capacity is 'indicative' and subject to detailed design.

*'i) Ensure 2% of site capacity to be provided as serviced self-build/custom build plots'*

11.2.16. It is noted that the requirement to provide 2% of site capacity as self-build/custom build plots aligns with Policy H6, which is the 'parent policy' relating to self-build/ custom build plots. Accordingly, criteria i) provides unnecessary duplication and should be deleted based on paragraph 16 of the NPPF (2023).

11.2.17. Notwithstanding this, the supporting text to Policy H6 explains that the Council has previously exceeded the requirement for self-build plots and emphasises the need for a 'flexible' policy approach, taking into account viability, construction and health and safety for example. It is also important to note that individuals can register on multiple housing registers and therefore the register is not an accurate representation of self build need. The Council's register is combined and so it is also not clear of the interest specifically for self-build and custom-build. Accordingly a blanket reference to providing 2% of site capacity as self-build/custom build plots is not appropriate or justified.

*'j) Provide green infrastructure and landscaping incorporating an appropriate amount open space, for each relevant typology using the standards in Appendix 3, this should include "a LAP and a LEAP to meet the need for children's play"*

11.2.18. The specific reference to a requirement for a 'LAP and a LEAP' is not considered necessary given that the first part of the criteria requires proposals to provide open space using the standards in Appendix 3. Further, it is questioned whether both a LAP and a LEAP are necessary to be provided, given that LEAPs are required for developments of up to 200 dwellings (based on the standards in Appendix 3) and the indicative capacity of development at Land at Stamford Road is 94 dwellings.

*'k) Submission of a Health Impact Assessment to identify and respond to the impacts of development on health and well being'*

11.2.19. The 'For Information' details provided at the end of Policy H1.1 include a list of application submission requirements, which include a 'Health Impact Assessment'. On this basis, criteria k) should be deleted to avoid unnecessary duplication based on paragraph 16 of the NPPF (2023).

*'For Information'*

11.2.20. The 'For Information' box sets out submission requirements to accompany a planning application for the site. No distinction or reference is made however to the type of planning application (e.g. full or outline) or the scope or stage at which this information might be required (e.g. via discharge of conditions). Detailed matters such as 'detailed design of off-site highway works' and a 'lux lighting plan' would more likely be submitted and agreed via condition / S106 obligation, rather than an outline application for instance. It is recommended that further clarity is therefore provided and appropriate cross-reference is made to the Council's validation checklist.

### 11.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

*Indicative capacity 94*

*Minimum 30% affordable housing*

~~29 affordable homes / 65 market homes~~

*The proposed development should be designed to incorporate the following key principles ~~within the layout:~~*

*a) ~~Retain and enhance all~~ **Where possible retain and safeguard** trees within the site and boundary hedgerows to contribute to the wider network of green corridors. **Any loss shall be compensated for by new supplemental planting**;...*

*c) Ensure the layout and detailed design including landscape mitigation measures alongside Stamford Road **seeks to** enhances the settlement edge and **conserve** the wider 'setting' of the Conservation Area and ~~preserves~~ the distinct openness along Stamford Road;*

*d) ~~Ensure the layout takes account of the Cordon Sanitaire in the north-east corner of the site;~~*

*e) Ensure **an** appropriate access solution to avoid conflict with Sculthorpe Close opposite and the junction of A6003 with A606 and **ensure** that **any** highway mitigations measures **required** are provided;*

*f) Provide safe, direct and convenient footway and cycleway connections through the site and to the town centre. This is likely to include a **2.5-3m** wide shared footway/cycleway facility along the Stamford Road **site** frontage, plus **supporting** public transport improvements as ~~a minimum~~ **appropriate**;*

*h) Provide an appropriate mix of housing choices which ~~reflect~~ **is informed by** the mix set out in the most up to date SHMA **and site-specific circumstances**. ~~including 30% of the site capacity as affordable homes (a target of 24 homes);~~*

*i) ~~Ensure 2% of site capacity to be provided as serviced self-build/custom build plots~~*

*j) Provide green infrastructure and landscaping incorporating an appropriate amount open space, for each relevant typology using the standards in Appendix 3, ~~this should include "a LAP and a LEAP to meet the need for children's play"~~*

*k) ~~Submission of a Health Impact Assessment to identify and respond to the impacts of development on health and well-being.~~*

#### **'For Information'**

Further clarity is required based on the different types of planning application and stages with appropriate cross-reference made to the Council's validation checklist.



## 12. Policy H3 (Housing Density)

### 12.1. Introduction

12.1.1. Policy H3 requires new development to *'make the most efficient use of land'* and encourages densities of no less than 25 dwellings per hectare (dph).

### 12.2. Response

12.2.1. Paragraphs 128-129 of the NPPF (2023) state that *'planning policies and decisions should support development that makes efficient use of land...'* and encourage the use of minimum density standards.

12.2.2. The current adopted Core Strategy Policy CS10 includes a requirement for 30dph in villages and 40dph in the built-up areas of Oakham and Uppingham, without reference to development making *'efficient use of land'*. The supporting text to Policy H3 explains that adopted Policy CS10 has been reviewed and *'the Council has decided that a better approach is to promote the efficient use of land in a way which responds to and reflects the local character and the opportunities presented by the site...'*

12.2.3. The overall approach now proposed in Policy H3 (requiring new development to *'make the most efficient use of land whilst responding to local character, context, and distinctiveness'*) therefore broadly aligns with Paragraph 128 of the NPPF (2023).

12.2.4. It is notable that the minimum density reference of 25dph is a reduction to that applied in draft Policy H1 (30dph) and that set out in the current adopted Core Strategy Policy CS10 (which refers to 30dph in the villages and 40dph within the built-up area of Oakham and Uppingham). On this basis, and given the increasing local housing needs in the County (as referred to above), it is recommended that Policy H3 encourages minimum densities of 30dph in order to help support meeting local housing needs, whilst also taking into account local characteristics and site-specific circumstances.

12.2.5. It will also be important that appropriate residential development densities are established through detailed design and the planning application process, in order to take account of local characteristics and site-specific circumstances.

### 12.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

New residential development is required to make the most efficient use of land whilst responding to local character, context, and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location, but generally should be no less than ~~25~~ **30** dph (dwellings per hectare).

## 13. Policy H4 (Meeting All Housing Needs)

### 13.1. Introduction

13.1.1. Policy H4 requires major developments to provide a range of housing types, sizes and tenure to meet both general and specialist needs. Table 4 accompanying Policy H4 outlines the housing size and tenure required in the County based on Housing Market Assessment (August 2023).

### 13.2. Response

13.2.1. The overall requirement for major development to provide a range of housing types, sizes and tenures to meet local needs reflects the provisions of the NPPF (2023).

13.2.2. It is noted that Policy H4 requires proposals to provide a mix of housing 'in line with Table 4...or other up-to-date evidence...'. Given that housing needs are likely to change over the course of the Plan period and across the County, it will be important that housing is provided to meet local needs at the time of development coming forward and taking into account site-specific circumstances. The latest HMA should therefore act only as a guide for any residential planning application and the policy itself should not be overly prescriptive.

13.2.3. It will be important that the housing mix required across the County is subject to ongoing monitoring to ensure it reflects up to date information and evidence of local needs.

### 13.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

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

## 14. Policy H5 Accessibility Standards

### 14.1. Introduction

14.1.1. Policy H5 states that all new dwellings are required to be adaptable and accessible to meet M4(2) standards. On sites of 50 or more dwellings, a minimum of 2% of all dwellings are required to meet M4(3) standards.

### 14.2. Response

14.2.1. The overall requirement for all new dwellings to be adaptable and accessible and to reflect the overall needs of the community aligns with Building Regulations and the provisions of the NPPF (2023) and is supported.

14.2.2. It is noted that draft Policy H5 has been updated to now require 2% of dwellings to meet M4(3) standards on sites of 50 or more dwellings, instead of 1% on sites of 100 or more dwellings, as proposed in the previous draft Regulation 18 consultation (January 2024). The requirement for developments to provide housing to meet M4(3) standards is based on the HMA (2023) as set out in the supporting text. However the HMA (2023) has not been updated since the Regulation 18 consultation (January 2024) and there is no further up to date evidence regarding M4(3) housing needs.

14.2.3. In addition, whilst the HMA (2023) identifies a need to increase the supply of wheelchair user dwellings, the HMA (2023) (paragraph 42) also explains that there is 'likely to be some overlap' between wheelchair users and care homes and suggests that the redevelopment / repurposing of existing stock is also considered.

14.2.4. To ensure the soundness of the Plan, it will be important to ensure that the requirements set for dwellings to meet M4(3) standards is based on an up to date evidence of local housing needs. Further, given that the specific need for M4(3) standard housing will be subject to change over the course of the Plan period, it is recommended that the need for M4(3) standard housing is determined on a case-by-case basis based on local needs at the time of development and site-specific circumstances.

### 14.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

'...~~On sites totalling 50 or more dwellings, a minimum of 2%~~ **A proportion** of all dwellings is required to meet part M4(3) of the Building Regulations **taking into account up-to-date evidence of local housing need...**'

## 15. Policy H6 (Self-build and custom housebuilding)

### 15.1. Introduction

15.1.1. Policy H6 states that sites of 50 dwellings or more will be required to provide at least 2% of site capacity as serviced plots for self-build and custom build homes.

### 15.1.2. Response

15.1.3. As referred to above, the supporting text to Policy H6 explains that the Council has previously exceeded the requirement for self-build plots and emphasises the need for a 'flexible' policy approach, taking into account viability, construction and health and safety for example.

15.1.4. The HMA (2023) (paragraph 45) explains that the Council is permitting self-build and custom housebuilding plots in excess of those on the Council's Self-Build and Custom Housebuilding Register. It is also important to note that individuals can register on multiple housing registers and therefore the register is not an accurate representation of need and there may be less interest than recorded.

15.1.5. On this basis, a blanket reference to providing 2% of site capacity as self-build/custom build plots is not considered appropriate or justified. Instead, to ensure the soundness of the Plan, it is recommended that provision is sought on a case-by-case basis, based on local needs at the time of development, site location and site-specific circumstances.

### 15.2. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

Sites of ~~50 dwellings and over~~ will be required to provide ~~at least 2%~~ **a proportion** of site capacity as serviced plots for self-build and custom build homes **taking into account up-to-date evidence of local housing need...**

## 16. Policy H7 (Affordable housing)

### 16.1. Introduction

16.1.1. Policy H7 states that all major residential developments comprising 10 or more dwellings will be required to provide a minimum of 30% affordable housing on-site. The policy also details criteria for the provision of affordable housing relating to design and tenure, including minimum requirements for 10% affordable home ownership and 25% First Homes.

### 16.2. Response

16.2.1. The overall approach to requiring provision of affordable housing on major housing developments aligns with the provisions of the NPPF (2023) and will help to support wider housing needs. Indeed it is crucial that the Local Plan supports additional overall housing supply, including market and affordable housing supply, in order to support local needs and contribute to addressing local affordability issues, as highlighted in the HMA (2023).

16.2.2. The policy sets out aims for two-thirds of affordable housing to be provided as affordable housing for rent and the remainder for affordable home ownership. The wording of the policy is however unclear with reference to 'affordable housing must...' and then '...affordable housing will normally be...'. Given that affordable housing needs are likely to change over the course of the Plan period and across the borough, it will be important that affordable housing is provided to meet local needs at the time of development coming forward and taking into account site-specific circumstances. It is therefore recommended that reference to a specific tenure mix is deleted.

16.2.3. Notwithstanding this, Planning Practice Guidance is clear that *'First Homes are the government's preferred discounted market tenure and should account for at least 25% of all affordable housing units'*. The minimum overall requirement in Policy H7 to provide at least 25% First Homes therefore aligns with the PPG. However, it is important the policy is not prescriptive and includes flexibility to ensure other new tenures can be included (e.g. in the event First Homes are replaced or new tenures are introduced). It is acknowledged that the policy makes reference to *'unless a contrary approach is justified by the relevant paragraph of the NPPF'*. It is however recommended that a minor amendment is made to refer broadly to national planning policy.

### 16.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

*'Affordable housing ~~must~~ **should**:...*

*b) include ~~at least two-thirds of affordable housing will normally be~~ affordable housing for rent and ~~the remainder will be~~ affordable home ownership **taking into account up-to-date evidence of local housing need...**'*

*'d) achieve a minimum of 25% of all affordable homes secured through developer contributions as First Homes (with the exception of Oakham and Barleythorpe whilst they are covered by their Neighbourhood Development Plan which was 'made' on 24 June 2022), unless a contrary approach is justified by ~~the relevant paragraph of the NPPF~~ **national planning policy...**'*

## 17. Policy SC1 (Landscape Character)

### 17.1. Introduction

17.1.1. Policy SC1 requires new development to reflect the local landscape character which has been identified in the Rutland Landscape Character Assessment 2022. The policy states that development proposals which meet criteria to *'conserve and enhance Rutland's local landscape character and distinctiveness will be supported'*.

### 17.2. Response

17.2.1. The overall approach of Policy SC1 is broadly consistent with the requirements for Chapters 15 and 16 of the NPPF (December 2023) as it seeks to protect and enhance valued landscapes and heritage assets.

17.2.2. Whilst we concur with the overall findings of the Landscape Character Assessment (December 2022), and specifically, *'Landscape Character Type B: Vale of Catmose'* within which Oakham is situated, importantly we note that this is a broad brush assessment and is not site specific.

17.2.3. Given the high level nature of this assessment, we are of the view that the policy should defer, or make reference to the finer grained 'Rutland Settlement Landscape Sensitivity Study' (RSLSS) (July 2023). Notably, in regard to 'Land south of Stamford Road' (Parcel OAK8), the RSLSS assessed the sensitivity of this parcel as "Medium/Low" Sensitivity to housing development. The supporting text further highlights that, *'...Well-designed housing could probably be accommodated that respects the form and character of the town in this location...'*

17.2.4. It is clear therefore that the Council's evidence base relating to landscape character supports the proposed allocation of Land south of Stamford Road for residential development.

### 17.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

*'New development must reflect and respond to Rutland's varied landscape character and contribute to the distinctive qualities of the landscape character type in which it is located. This includes the distinctive elements, features and other spatial characteristics identified in the updated Rutland Landscape Character Assessment (2022) and Rutland Settlement Landscape Sensitivity Study (2023)...'*

## 18. Policy SC2 (Place Shaping Principles)

### 18.1. Introduction

- 18.1.1. Policy SC2 requires that all new development proposals *'must be appropriate in scale and design to the location, character and features of the setting and landscape within which it is situated'*.

### 18.2. Response

- 18.2.1. In a similar context to Policy SC1, the draft wording for Policy SC2 confirms that local character and distinctiveness should have regard to the Rutland Landscape Character Assessment 2022 and the RSLSS 2023.
- 18.2.2. As referred to above, in regard to 'Land south of Stamford Road' (Parcel OAK8), the RSLSS assessed the sensitivity of this parcel as "Medium/Low" Sensitivity to housing development. The supporting text further highlights that, *'...Well-designed housing could probably be accommodated that respects the form and character of the town in this location...'*. It is clear therefore that the Council's evidence base relating to landscape character supports the proposed allocation of Land south of Stamford Road for residential development.



## 19. Policy SC3 (Promoting Good Quality Design)

### 19.1. Introduction

19.1.1. Policy SC3 seeks to ensure that new development is of a high quality design which reflects a number of identified design principles.

### 19.2. Response

19.2.1. The overall aspiration to secure high standards of design in the County broadly reflects the aims of the NPPF (2023). It is particularly important however that design guidance is not unnecessarily prescriptive or repetitive, in order that full consideration is given to site-specific characteristics and that flexibility of design standards is allowed for where appropriate.

19.2.2. It is noted that Policy SC3 includes cross-references to a number of other Local Plan policies (including Policies H4, H7, SC6) and other local planning policy. The NPPF (2023) (paragraph 16) is clear that plans should avoid 'unnecessary duplication of policies' and therefore it is recommended that Policy SC3 is reviewed and refined for clarity.

19.2.3. The Local Plan aspiration to achieve high standards of design should also take into account the need for development to be deliverable and viable, as required by the NPPF (2023), in order to ensure that a sufficient supply of homes is delivered.

### 19.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

~~'3. Mixed and integrated uses — proposals must demonstrate:~~

~~a) that they provide or connect to a range of conveniently located and accessible local services and community facilities and high quality public spaces to create vibrant communities and places (see also Policy SC6;~~

~~b) an appropriate mix of home tenures, types, and sizes (as needed locally) which includes affordable housing (to meet requirements of Policy H4 and H7 which are socially inclusive, sensitively located, in clusters of no more than 15\* (except on wholly affordable housing schemes) and not easily identifiable by design quality (including materials), style (including house types and architectural details) or location in terms of not placing affordable units in less desirable locations; and~~

~~c) a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites.'~~

~~'4. Amenity and easy to use homes and buildings — proposals must:...~~

~~e) provide sufficient car parking for the location and type of development, (see Appendix 5 – Parking Standards)...~~

~~'6. All major development (as defined in the Glossary) must demonstrate compliance with:~~

~~a) Manual for Streets guidance;~~

~~b) for new residential proposals, development should perform positively against Building for Healthy Life and Streets for a Healthy Life (Homes England). This should be demonstrated within a Health Impact Assessment where thresholds in Policy SC5 are met; and~~

~~c) Neighbourhood Plan policies.~~

~~and any subsequent national guidance which supersedes them.'~~

## 20. Policy EN1 (Protection of Sites, Habitats and Species)

### 20.1. Introduction

- 20.1.1. Policy EN1 and supporting text sets out the Council's approach towards the provision and mitigation of biodiversity and geodiversity in new development.
- 20.1.2. In all instances, the policy notes that the loss of designated sites, irreplaceable habitats and priority habitats should be minimised and only carried out in exceptional circumstances where suitable mitigation and a compensation strategy (of equal or improved value) is provided. This approach applies to sites of international, national and local importance
- 20.1.3. There is reference to the need to apply the mitigation hierarchy and a need to protect the features of most value, including the protection of designated sites and priority habitats.

### 20.2. Response

- 20.2.1. The overall approach of Policy EN1 broadly matches the provisions of Paragraph 186 of the NPPF (2023) and is therefore considered an acceptable approach.
- 20.2.2. It is however noted that the policy as currently drafted partly duplicates the provisions of other policies in the draft Local Plan, specifically those in relation to Biodiversity Net Gain (Policy EN3). Based on paragraph 16 of the NPPF (December 2023), the references to Biodiversity Net Gain in Policy EN1 are considered unnecessary duplication, alongside creating potential confusion and contradiction with the secondary legislation of the Environment Act 2021. It is therefore recommended that the references to Biodiversity Net Gain in this policy are deleted.

### 20.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

5 b) ~~thirdly, Biodiversity Net Gain will be delivered (in accordance with policy EN3) and managed in perpetuity (minimum of 30 years) through the appropriate means e.g., a legal agreement. d:~~

## 21. Policy EN3 (Biodiversity Net Gain)

### 21.1. Introduction

21.1.1. Policy EN3 proposes a 10% biodiversity net gain to be achieved on all development sites (through a hierarchical approach of on-site delivery, off-site delivery or a credit scheme).

### 21.2. Response

21.2.1. The Environment Act 2021 includes provision for the delivery of at least a 10% net gain in biodiversity over pre-development levels on all sites. This requirement came into force for major sites in February 2024.

21.2.2. The overall approach to seek a 10% biodiversity net gain is in line with the provisions of the Environment Act 2021 and the accompanying secondary legislation. However, notably paragraph 16 of the NPPF (2023) states that plans should be 'avoiding unnecessary duplication of policies'. It is therefore questioned whether it is necessary to duplicate the requirements of statutory legislation.

### 21.3. Summary

With reference to paragraph 35 of the NPPF (2023), it is questioned whether it is necessary to duplicate the requirements of statutory legislation, having regard to the requirements of paragraph 16 of the NPPF (2023).

## 22. Policy INF1 (Infrastructure and Connectivity)

### 22.1. Introduction

22.1.1. Policy INF1 provides details regarding the Community Infrastructure Levy and /or use S106 obligations to secure infrastructure improvements for development proposals. Policy INF1 requires that *'all new development will be supported by the provision of the necessary infrastructure, services, utilities and facilities to meet the needs arising from new development in a timely way.'* The policy is supported by the Infrastructure Delivery Plan (IDP) (2024) which identifies the key infrastructure requirements to support proposed site allocations.

### 22.1.2. Response

22.1.3. The overall approach towards new infrastructure provision is broadly supported. It will however be important to ensure that any planning obligations sought meet the tests set out in paragraph 57 of the NPPF (2023), which states that, *'Planning obligations must only be sought where they meet all of the following tests:*

- *necessary to make the development acceptable in planning terms;*
- *directly related to the development; and*
- *fairly and reasonably related in scale and kind to the development.'*

22.1.4. The IDP (2024) identifies a number of 'completed or committed schemes' which could benefit development at Land south of Stamford Road, including a Mobility Hub at Oakham and roll-out of Countywide Digital Demand Responsive Travel (DDRT) service.

22.1.5. Notably, paragraph 5.51 of the IDP (2024) states that *'site-specific interventions have yet to be identified for the planned growth and site allocations in the Local Plan apart from Stamford North'*; however, Land south of Stamford Road is identified as a contributing site in the IDP (Appendix 2) to infrastructure and active travel improvements, including at 'A606 Oakham Road Burley Park Way Roundabouts' (ref. H1) and 'B688 Burley Road/Ashwell Road' (ref. AT2). It is considered however that the relationship between development at Land south of Stamford Road and these identified infrastructure improvements should be reviewed, having regard to the scale, location and additional trip generation of the development.

22.1.6. Part 2 of the policy requires that allocated sites include site-specific mitigation as part of the site development costs and *'make provision for all the land required to accommodate any additional infrastructure arising from the development on site'*. Whilst the overall requirement to provide for wider infrastructure requirements is acknowledged, it is recommended that *'for all the land required'* is deleted to clarify that a development may support provision of wider planned local infrastructure rather than provide land itself.

22.1.7. Part 4 of the policy refers to how new residential development will *'be supported if it can be demonstrated that sufficient infrastructure capacity is either available or can be provided in time to serve the development.'* It is considered that the term 'sufficient' should be better defined. For example, for highways it should better reflect the wording of the NPPF (2023) (paragraph 115), which states: *'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'*.

### 22.2. **Summary**

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

2. *'...Development proposals should make provision for ~~all the land required to accommodate any additional infrastructure arising from the development on site.~~*

Amendments to part 4 to reflect paragraph 115 of the NPPF (2023).

The relationship between development at Land south of Stamford Road and infrastructure improvements identified in the IDP (e.g. H1 and AT2) should be reviewed.

## 23. Policy INF2 (Securing sustainable transport)

### 23.1. Introduction

23.1.1. Policy INF2 requires all development that is expected to have an impact on the County's transport network to meet specific criteria.

### 23.2. Response

23.2.1. The overall approach of Policy INF2 broadly aligns with the provisions of the NPPF (2023). However, there are several detailed points which require review. For example, the terminology of what comprises an 'impact' should be more precisely defined and related to the NPPF (2023), as well as the reference to 'efficient' public transport. It should also be recognised in the policy that not all development will be able to meet every criteria.

23.2.2. It is also considered that point a) is superfluous given the duplication of reference to the Local Transport Plan and the specific requirements set out by the policy at Points B to J.

23.2.3. The rural setting of Rutland should also be acknowledged in the policy and that in some areas or locations it will not be possible for all developments to meet all criteria due to the setting or existing services and infrastructure available. For example, at point b) it will not always be possible to give priority to a range of transport choices including efficient public transport if 'efficient public transport' is not available locally to the site or planned for by the Council.

23.2.4. The County Council's Passenger Transport Strategy is also included as a reference in the policy at point f); however, this does not appear to be available or has been incorrectly defined and therefore should be clarified.

### 23.3. Summary

With reference to paragraph 35 of the NPPF (2023), the following proposed changes are recommended in order to ensure the soundness of the Plan.

The terminology regarding 'impact' and 'efficient' should be more precisely defined and related to the NPPF (2023).

Part a) is superfluous and should be deleted.

The rural setting of Rutland should also be acknowledged in the policy.

Reference to the County Council's Passenger Transport Strategy should be clarified.

## 24. Conclusion

### Summary

- 24.1.1. These representations have been prepared on behalf of SMV in relation to the current Regulation 19 draft Rutland Local Plan consultation. Comments have been provided based on the policies and supporting text within the draft Regulation 19 draft Local Plan, as well as the supporting evidence base documents.
- 24.1.2. SMV own landholdings at Land south of Stamford Road, Oakham (ref. H1.1) and therefore wish to inform the final stages of the preparation of the Local Plan.
- 24.1.3. Oakham is identified in the draft Local Plan as the main town in Rutland and the focus for development over the Plan period. 'Land south of Stamford Road' is allocated for residential development for up to 94 dwellings under Policy H1.1 of the draft Local Plan.
- 24.1.4. Our response supports the overall spatial strategy and the proposed allocation of 'Land at Stamford Road' (ref. H1.1). The accompanying Vision Document (Appendix 2) with emerging Framework Masterplan detail how development could be accommodated on the site and how the proposed allocation could be delivered.
- 24.1.5. Our response recommends a number of changes to draft Local Plan policies in order to ensure the soundness of the Plan, with reference to paragraph 35 of the NPPF (2023). This includes a number of minor amendments to the draft site allocation of Land south of Stamford Road (Policy H1.1), including in relation to the 'key principles' and application submission requirements.





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## Appendices

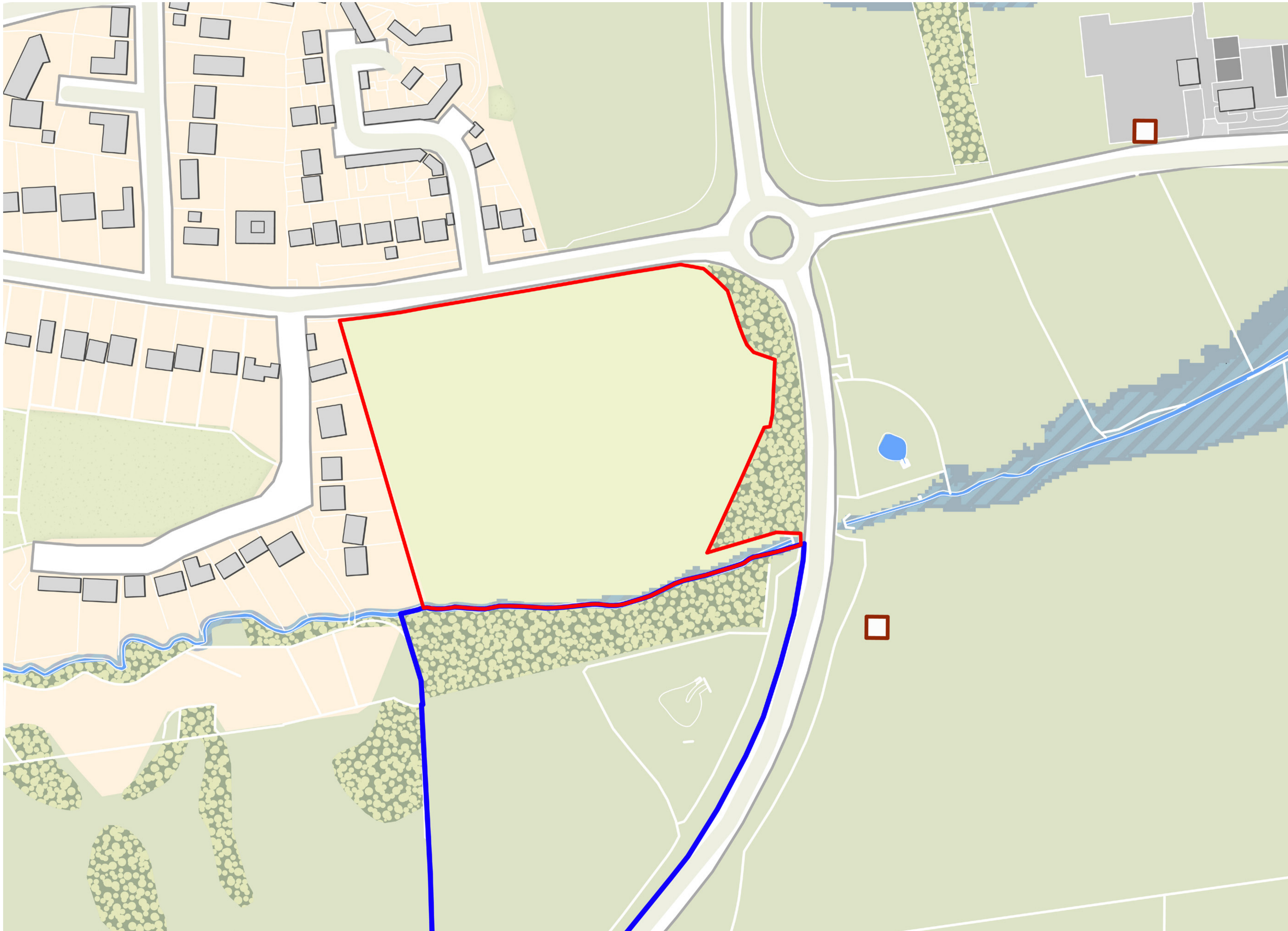
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## Appendix 1 – Site Location Plan

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Key  
 Site Boundary  
 Other Land under the same ownership

Land at Stamford Road, Oakham

on behalf of Society of Merchant Venturers  
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drawing no.	AP001	drawing	Location Plan - DRAFT
revision		scale	1:1000
drawn by	CM	checked by	CM
date	09/07/2024	job no.	RGPL1053094





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## Appendix 2 – Vision Document

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# STAMFORD ROAD OAKHAM

VISION DOCUMENT 2024





This document has been produced by Savills Urban Design Studio.

Savills, Wytham Court, 11 West Way, Oxford OX2 0QL

VERSION:  
03

DATE:  
DECEMBER 2024

PRODUCED BY:  
RA

CHECKED BY:  
CM

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- 1.2 The Society of Merchant Venturers
- 1.3 Planning Process

## 2. Site Appraisal

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- 2.4 Site Photographs
- 2.5 Technical Work
- 2.6 Summary of Opportunities & Constraints

## 3. Masterplan and Design Strategy

- 3.1 Design Strategy
- 3.2 Emerging Framework Masterplan
- 3.3 Design Approach

## 4. Conclusion

# INTRODUCTION

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## 1.1 STATEMENT OF PURPOSE

The purpose of this document is to set out the vision for the proposed development of land at Stamford Road, Oakham and demonstrate how a development here could be delivered as part of the Rutland Local Plan as a sustainable location for delivering homes. The site is located to the south-east of the town and could contribute to the growth that Oakham is required to accommodate. The site is being promoted for the development of approximately 94 dwellings, providing a mix of market and affordable housing to contribute to meeting local needs.

The document demonstrates how the site could be developed by:

- Considering the wider context, and how future development can integrate into the town;
- Considering how future development could create a new landscape framework, that integrates into the existing green network;
- Providing high quality design solutions and a diverse range of high quality housing; and
- Understanding the site's technical constraints to ensure a robust and deliverable proposal.

## 1.2 THE SOCIETY OF MERCHANT VENTURERS (SMV)

The SMV is a private organisation, incorporated under the Royal Charter, that is the endowment trustee of the St. Monica Trust, a registered charity that owns and manages land within the charity's ownership at Oakham. The income generated from the holding is used to help fund the work of the charity, and any proceeds generated are similarly held for the benefit of the charity.



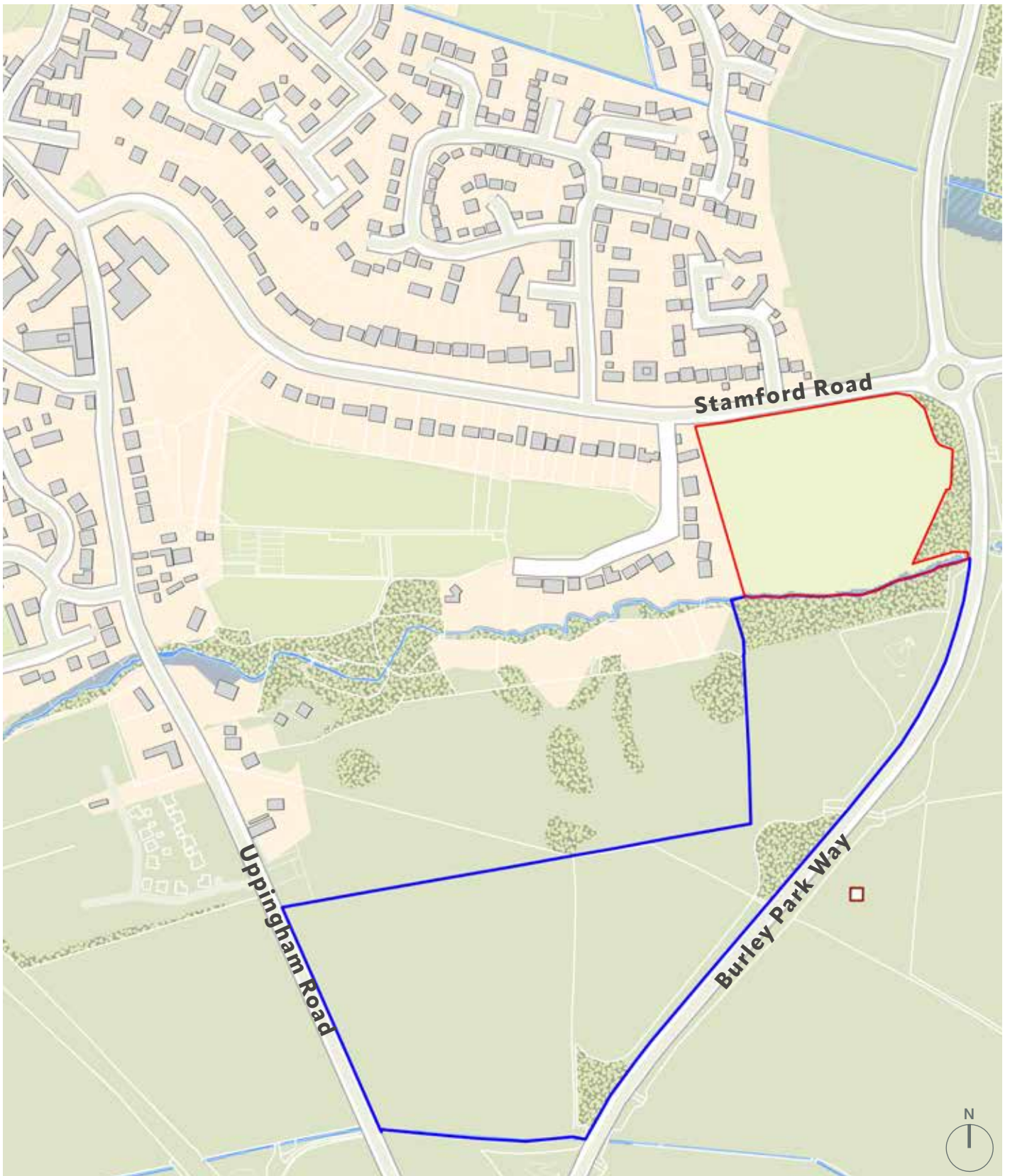
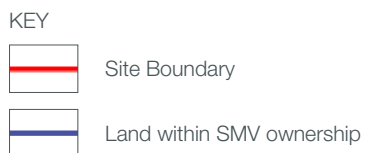


Figure 1. Location Plan



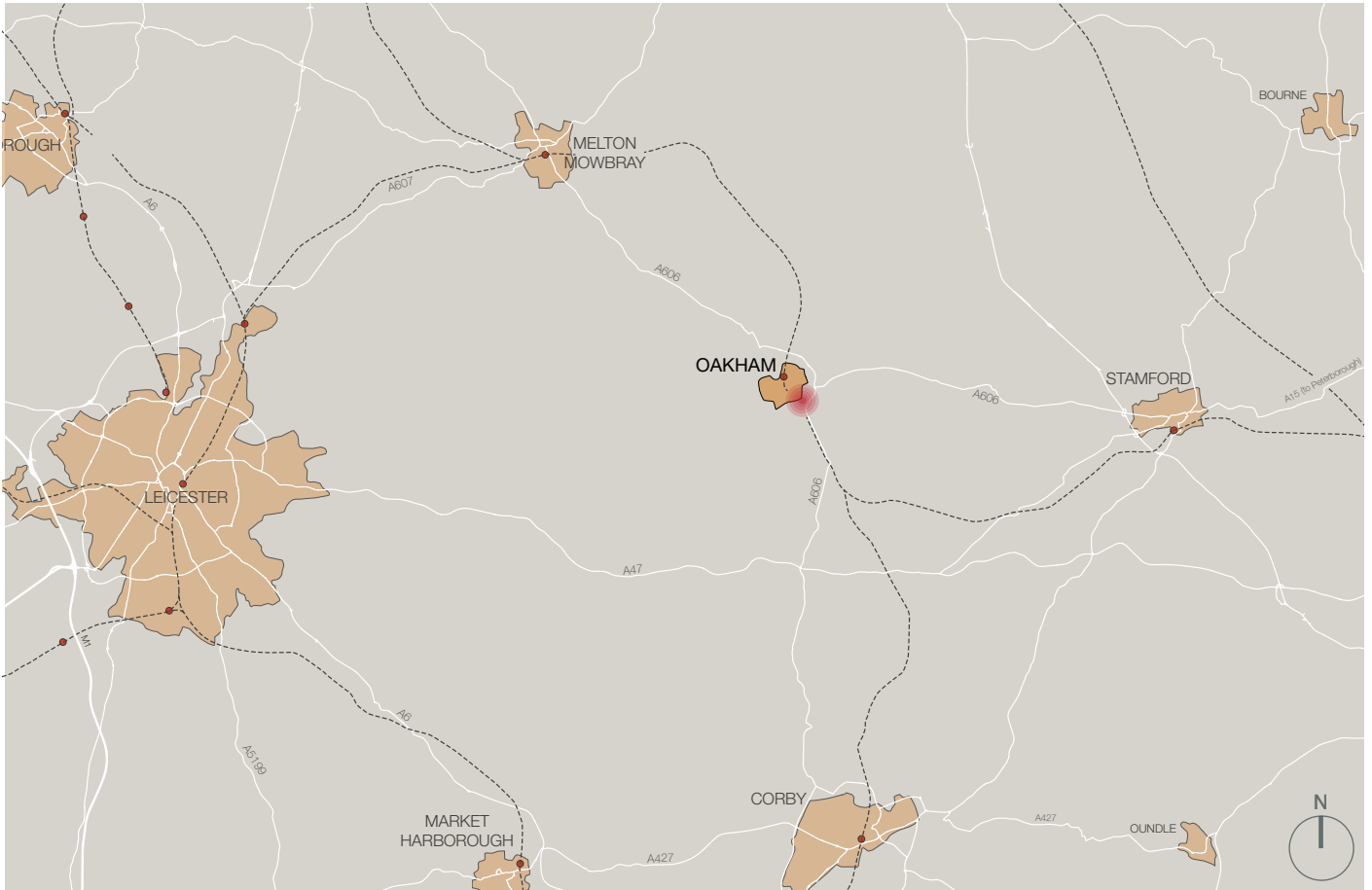


Figure 2. Strategic Location Plan

KEY

	Site Location		Rail Station		Existing Road Network
	Existing Built Form		Rail Line		

### 1.3 PLANNING PROCESS

This document has been prepared in response to meetings held with the Policy Team at Rutland County Council (RCC) following the completion of the Regulation 18 consultation in January 2024. The Vision Document seeks to inform the preparation of the emerging new Local Plan and provides an overview of the opportunities for residential development at Land at Stamford Road, including the provision of associated infrastructure, active travel links and green infrastructure.

A Preferred Options draft Local Plan (Regulation 18) consultation was undertaken between 13 November 2023 and 8 January 2024. Policy H1 of this document identified and assessed sites proposed for residential development over the new plan period. Land at Stamford Road was

included as a draft allocation under emerging Policy H1.3. A Pre-Submission draft Local Plan (Regulation 19) consultation is being undertaken from 21 October to 2 December 2024. Land at Stamford Road remains a draft allocation under emerging Policy H1.1. The emerging Local Plan is underpinned by a number of strategic objectives that are relevant to the site. These are set out in Figure 3.

### NEIGHBOURHOOD PLAN

The Oakham and Barleythorpe Neighbourhood Plan is a document that outlines how the two areas should develop from 2018 to 2036. The plan was created by Oakham Town Council and Barleythorpe Parish Council in consultation with the local community. It was formally made in June 2022.

### **i) Strategic Objective 1: Climate Change**

Taking positive action to achieve net-zero and reduce our carbon footprint, whilst mitigating and adapting to reduce the impact of climate change and reduce the risk of harm to people, communities, the environment, and the economy.

### **ii) Strategic Objective 2: Delivering Sustainable Development**

Delivering development which meets today's needs in a way which ensures the needs of future generations are not compromised.

### **iii) Strategic Objective 3: Meeting housing needs**

Meeting Rutland's identified current and future diverse housing needs, including the affordability and adaptability of housing, through the provision of well-designed, energy efficient and low/zero carbon new homes.

### **iv) Strategic Objective 4: A prosperous and resilient local economy**

Supporting business investment and job creation in ways which are compatible with environmental considerations, food security, rural development and supporting visitor attractions to maintain a prosperous and resilient economy in Rutland.

### **v) Strategic Objective 5: Supporting healthy and vibrant communities**

Promoting health and wellbeing for people of all ages and reduce health inequalities.

### **vi) Strategic Objective 6: Creating safe, inclusive, and resilient communities**

Supporting all communities across the County to make them safe, inclusive, resilient to change with enhanced community cohesion.

### **vii) Strategic Objective 7: Promoting high standards of design**

Promoting high standard of design in all new development which is:

- innovative
- low carbon
- climate resilient
- low cost
- responds to its local character
- locally distinctive
- uses nature-based solutions
- cleaner, greener and creates safer places.

### **viii) Strategic Objective 8: Protect and enhance the built and natural environment**

To provide, protect and enhance Rutland's varied and high-quality built and natural

environment, which includes:

- natural landscapes
- multifunctional blue and green infrastructure
- biodiversity and geodiversity
- trees and hedgerows
- heritage assets and their settings
- cultural assets.

### **ix) Strategic Objective 9: Make effective use of land and natural resources**

Encouraging the effective and prudent use of previously developed land and natural resources.

### **x) Strategic Objective 10: Ensure development is supported by essential infrastructure and services**

Ensuring development is supported by essential infrastructure and services.

### **xi) Strategic Objective 11: Minerals**

Ensuring a steady and adequate supply of minerals to meet national, regional, and local needs whilst taking account of impacts on the environment and local communities.



## SITE CONTEXT

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### 2.1 SITE CONTEXT

The development site is located to the south east of Oakham, close to both the town centre, employment and a range of local facilities and open spaces. Oakham is located between Leicester and Peterborough, and forms the primary settlement in a largely rural area. Oakham lies at the base of a broad, generally flat valley running north to south towards the banks of Rutland Water. The major ridgelines provide significant physical and visual enclosure to the town.

The southern areas of the town are largely residential, with small scale industrial and commercial areas located to the north of the settlement. Stamford Road is defined by housing that has developed within the Conservation Area to the west of the Site. Recent development to the northeast of the site has extended the town further along Stamford Road. The approach along Stamford Road is an important gateway into Oakham and the development of the site offers the opportunity to provide a strong, high quality entrance to the town. The site constraints and opportunities have been used to inform the potential development area, and provide an approximate development capacity for the site.

### 2.2 HISTORIC DEVELOPMENT

The town of Oakham dates back to the 12th century or earlier. The town centre and market are part of the historic core that lies to the south of the castle. Historic plans show that little changed to the east of the town from 1886 to the mid-20th century, although the cricket ground south of the High Street was established by 1930. The Oakham Conservation Area includes the historic core of the town and extends along Stamford Road, to include the grounds of the former Catmose House (now home to the County Council).

By the 1950s some low density post war development extended along Stamford Road. Development continued along this route in the 1970s, 80s and 90s. The most recent development dates to the early 2000s, around Sculthorpe Close, to the northeast of the site.



Figure 4. 1930 Historic Map



KEY

- |   |                           |   |                   |  |                         |
|---|---------------------------|---|-------------------|--|-------------------------|
|  | Site Boundary             |  | Building          |  | Woodland and open space |
|  | Land within SMV ownership |  | Conservation area |  | Rutland Water           |
|   |                           |  | Railway Line      |  |                         |

Figure 5. Site Context

## 2.3 FACILITIES AND AMENITIES

Oakham is a vibrant town, with a wide range of facilities and amenities that are easily accessible to residents. This makes the town a sustainable location for development.

### RETAIL & LEISURE

The town centre of Oakham is located approximately 800m to the north-west of the site and provides a wide range of retail and leisure facilities including high street chains, independent traders and boutique stores, cafés and restaurants. There is a large supermarket located on South Street, close to the town centre and under a mile away from the site.

### EDUCATION

There are three nearby primary schools, Oakham Primary School, Oakham Preparatory School and Catmose Primary School; located 1.3km north, 1.2km west and 1.9km west from the centre of the site respectively. Catmose College provides secondary education, drawing students from Oakham and the surrounding villages.

### HEALTH

Rutland Memorial Hospital and Oakham Medical Centre are located on Cold Overton Road, approximately 1.5Km from the site.

### EMPLOYMENT

Oakham provides regional and local level employment opportunities. The town centre has a range of retail and office uses, with a good diversity of businesses. There are a number of large industrial areas encircle the northern edge of the town, benefiting from the Town's proximity to the wider strategic road and rail network.

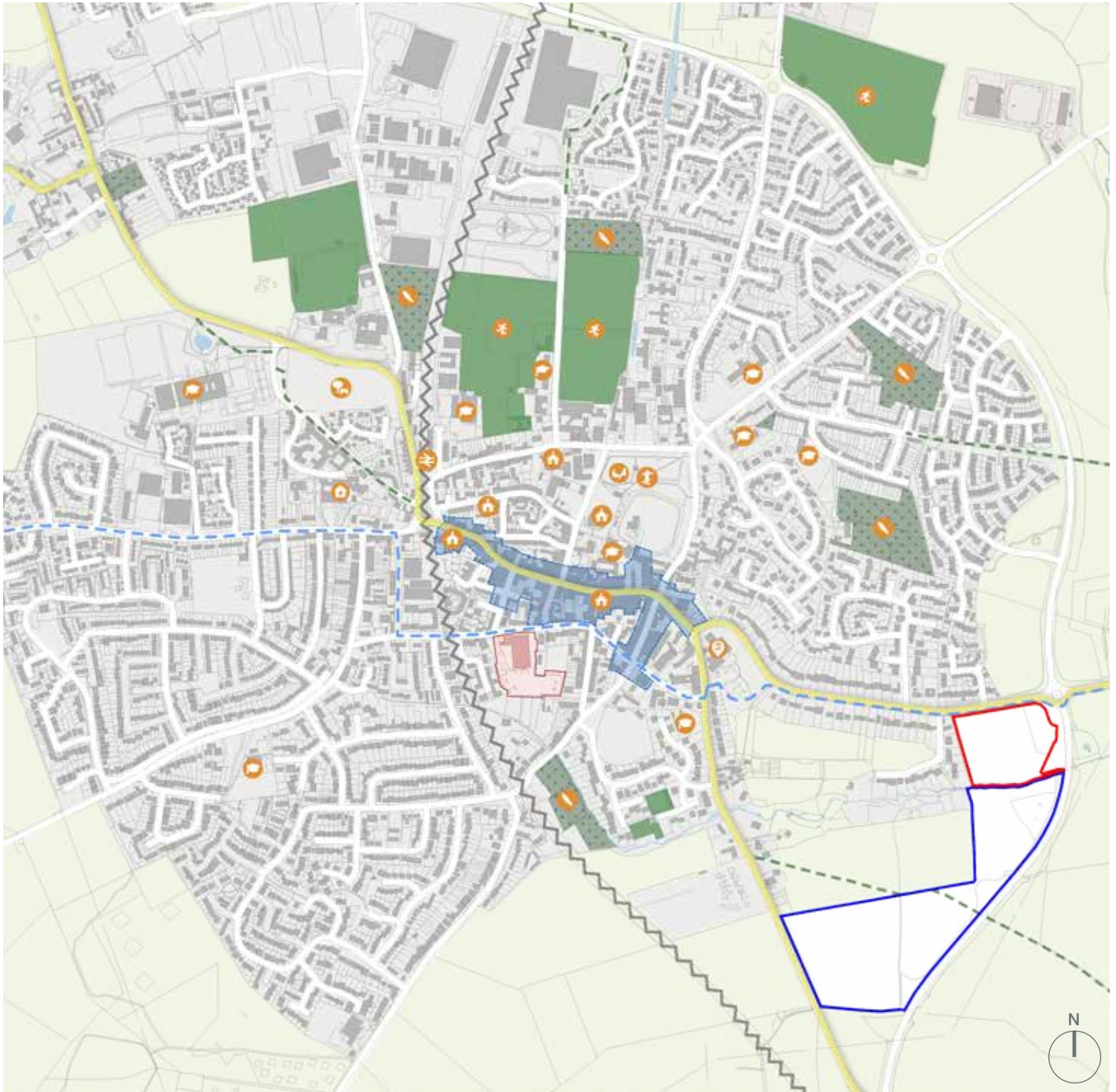
### MOVEMENT

Oakham Train Station is located to the north of the town centre, within easy cycling distance of the site. Rail connections are available to Birmingham and Cambridge. The primary transport routes in the area are the A606 and A6003 connecting Oakham with Stamford to the east and Kettering to the south. The two routes combine to form a bypass to the east of Oakham which forms a physical and visual barrier to the town.

There are a number of Public Rights of Way within the area surrounding Oakham providing links between the town and the surrounding settlements. Sustrans long distance cycle route 63 runs along from Burton on Trent to Wisbech. This cycle route is separated from the carriageway by a wide verge and provides a pleasant route to the town centre. There may be opportunities to improve this route in order to encourage an increased uptake in cycling.

### OPEN SPACE

There are a number of open space amenities located within a 10 minute walk from the site including sport pitches, allotments and informal open spaces. Rutland Water, a major tourist attraction and leisure area, that lies approximately 2km to the east of Oakham.



KEY




















	Site Boundary		Railway Line		Place of worship		Skate park
	Land within SMV ownership		Bus Route		Hospital		Green space
	Existing PRoW		Supermarket		School / college		
	Existing National Trail / Sustrans		Allotments		Sports pitch		Allotment
	Town Centre Boundary		Recreational Fields		Play area		

Figure 6. Facilities and Access Plan

## 2.4 SITE PHOTOGRAPHS



Photograph – View looking south-west across the site towards the dwellings along the eastern edge of Oakham



Photograph – View looking north-west across the site towards the dwellings along the eastern edge of Oakham



Photograph - View looking north across the site towards Stamford Road





Photograph - View looking south-east across the site towards the ridge line at Upper Hambleton.



Photograph - View looking south-east across the site towards the ridgeline at Upper Hambleton.



Photograph - View looking south-west to the site from Sculthorpe Close

## 2.5 TECHNICAL WORK

### LANDSCAPE AND TOPOGRAPHY

The site topography falls from the northern boundary with Stamford Road towards the watercourse at the Site's southern boundary, steepening towards the boundary. The site's principal tree cover is along the southern boundary, where an established broadleaf copse lines the adjacent water course. To the east, the boundary is defined by buffer planting associated with the adjacent Oakham bypass. Bounding Stamford Road to the north, a low quality agricultural hedgerow defines the field boundary, with a physiologically declining Elm situated at its western extent. Immediately to the west of the site, lies Oakham Conservation Area, where dominant trees are an important component, and are likely associated with the former Catmose Park.

The site has a contained character. Views into the site are limited and occur from Stamford Road, properties on Sculthorpe Close and from the rear of properties on Catmose Park Road. Views of the Site from the wider landscape are limited by a combination of intervening topography and vegetation. The site may be seen from a small geographic cone to the east / south-east, where the Site is visible against the backdrop of Oakham's built form and where the site forms a small part of the wider panorama.

### ECOLOGY

The site has been under agricultural management for many years and holds limited ecological value. There will be an impact on the hedgerow adjacent to Stamford Road, which is in a poor state. The woodland associated with the stream provides good ecological value, with connectivity between adjacent habitats, such as the plantation woodland and habitats south west of Oakham. A range of protected species could potentially utilise these habitats using the stream and woodland to forage and disperse. However, it is unlikely that they would be present within the arable field. The proposals will not directly impact the woodland and stream corridor.



Photograph – View of trees along western edge

## ARCHAEOLOGY

Oakham and the surrounding area of Rutland contains a number of buried archaeological remains. The Historic Environment Record data is clear that there is archaeological evidence surrounding the site, some of which is contained within the red line boundary. Therefore, there is a high likelihood of both known and unknown archaeological remains to be present within the site that will need to be considered as part of the development proposals. It is not however anticipated that any archaeological remains present within the site will preclude the proposed development if mitigated accordingly.



Photograph – Catmose House

## BUILT HERITAGE

The historic core of Oakham and the historic boundary of the Catmose House Estate are designated as a Conservation Area. The edge of the Conservation Area lies immediately adjacent south-eastern edge of the site. In the absence of a formal Conservation Area Appraisal, professional judgement has been applied in assessing the special historic or architectural interest of the Conservation Area.

The south-east extension of the Conservation Area, closest to the site, comprises relatively limited built development, and that which is included along the roads closes to the site (Stamford Road and Catmose Park Road) is modern in character and appearance, being legibly distinct to much of the rest of the Conservation Area. The greatest contribution made to the significance of the Conservation Area by this section, is the historic interest made by the 18th century Catmose House and its later landscaped grounds. Whilst the site is located adjacent to the Conservation Area, it does not form part of it and does not contribute to its character or significance in a meaningful way, currently only forming part of the wider rural setting.

## MOVEMENT

An Access and Movement Strategy for Land at Stamford Road has been created to support the draft allocation in the Rutland Local Plan. The strategy sets out a Transport Vision for the Site, which focuses on reducing the need to drive in line with Rutland County Council's Local Transport Plan 4, and giving priority to active travel, wellbeing and connectivity in line with the key strategic objectives of the draft Regulation 19 Rutland Local Plan.

A safe and suitable access is proposed via a priority junction off Stamford Road, with an emergency and pedestrian / cycle access provided to the northeast. The movement strategy focuses on...! and then delete 'Furthermore safe and suitable access can be delivered within one ownership and without third party land



Photograph – View looking west along Stamford Road

## WATER MANAGEMENT

The developable area of the site is located within Flood Zone 1 on the Environment Agency Flood Map for Planning and therefore at a low risk of river (fluvial) flooding. The south of the site, adjacent to the watercourse where the topography is lower, is shown to be at risk of pluvial surface water and fluvial flooding; however, no development is proposed in this area. The proposals would include attenuation basins to store surface water runoff generated from impermeable surfaces with runoff restricted to greenfield runoff rates and directed to the watercourse.

## UTILITIES

The site lies to the southwest of the Oakham Sewage Treatment Works, which lie to the east of the A606. The site falls outside a 250m cordon sanitaire for the Sewage Treatment Works.

To the east of the A6003 electrical pylons dominate the landscape, connecting to the local substation. Within the site, a mains sewer runs west – east in the southern part of the site; this is likely to require a 6m easement which has been considered as part of the development parameters.



Photograph –View looking at the southern boundary of the site along the brook and planted edge

## 2.6 SUMMARY OF OPPORTUNITIES AND CONSTRAINTS

The site is well related to the existing settlement edge and will form a continuation of the late 20th century development along Stamford Road. The site is visually contained by the topography and mature tree belts which run along the southern and eastern boundaries. The bypass to the east of the Site forms the defensible settlement edge and defines the boundary between town and countryside. Careful consideration to the extent of built development will be given, to respect the existing mature trees and continue the verdant character to the south-eastern edge of the town.

### OPPORTUNITIES

- Provide new market and affordable homes with associated infrastructure and public open space
- Provide local areas of open space with equipped play areas
- Retain important trees and vegetation
- Reinforce the mature landscape structure with significant new tree planting across the site
- Provide a high quality frontage, with development set back to respect the character of the Conservation Area
- Provide a high quality gateway to the town.

### CONSTRAINTS

- Maintain the privacy and amenity of existing residential properties which adjoin the site
- Maintain a high quality edge to respect the tree cover within the Conservation Area
- Standoff from the from the brook and associated floodplain
- Retain existing vegetation and carefully design around existing trees along the western boundary
- Standoff from the sewer running through the site
- Consider the impact of any archaeology on the site.

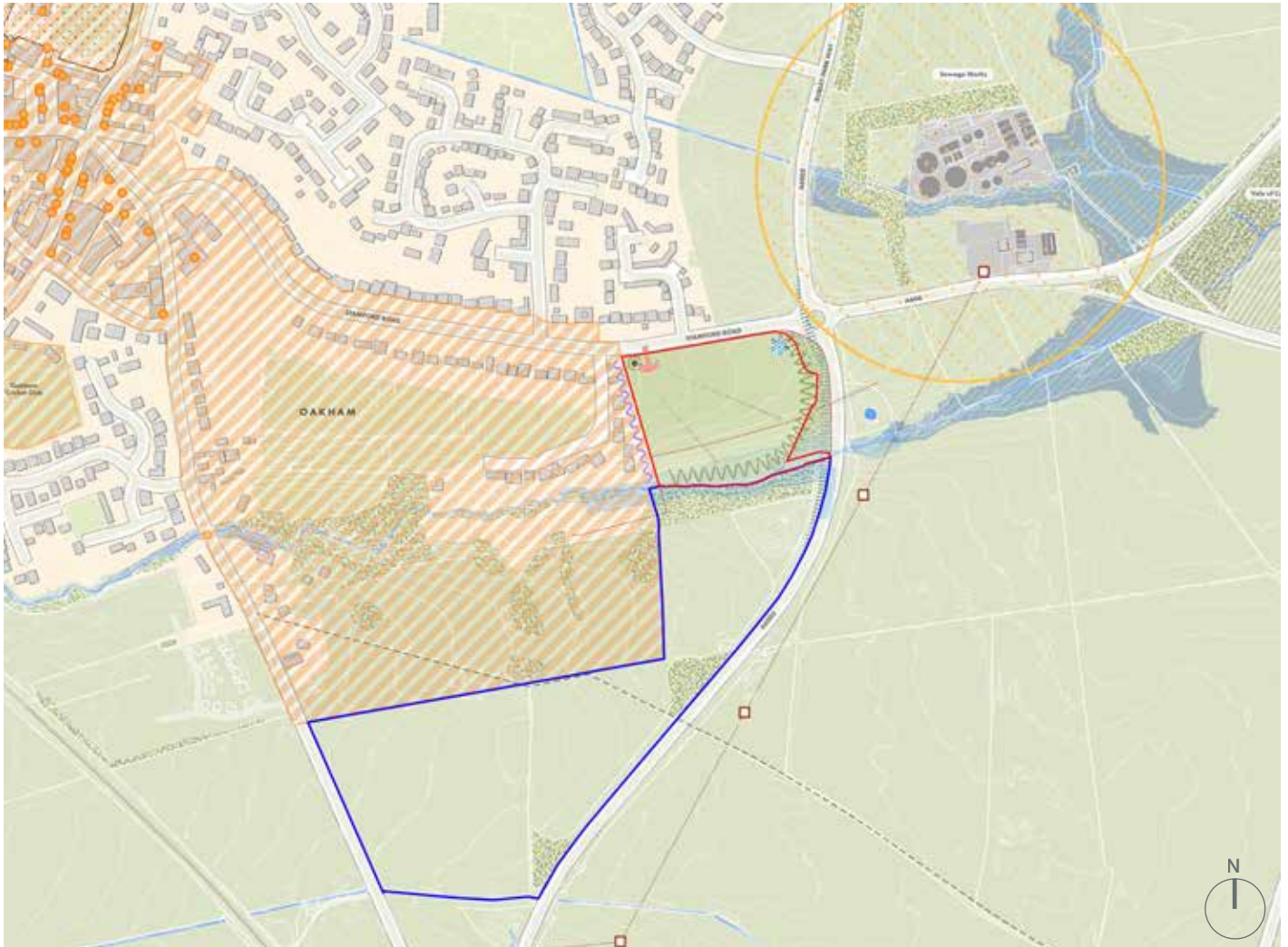


Figure 7. Constraints and opportunities plan

KEY

Site Boundary	<b>Open Space:</b>	<b>Topography:</b>
Land Under the Same Ownership	Woodland	Contours
<b>Access:</b>	Park/Public Garden	High Point & Slope Direction
Public Right of Way (PRoW)	Sensitive Edge to Landscape	Low Point
Proposed Access	Water Body	
Gateway to Oakham	Flood Zone 2	
<b>Heritage:</b>	Flood Zone 3	
Listed Building	<b>Utilities:</b>	
Conservation Area	Sewer	
Site of Special Scientific Interest - Rutland Water	Electricity line	
Scheduled Ancient Monument	Oakham Sewage Treatment Works Cordon Sanitaire 250m radius	
	Potential Noise from Burley Park Way	



# MASTERPLAN AND DESIGN STRATEGY

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## 3.1 DESIGN STRATEGY

The site at Stamford Road has the potential to extend the east of Oakham in a way that provides a high quality gateway to the town, whilst reflecting the settlement boundary and open space to the north. The proposals will positively relate to Rutland County Council's Strategic Objectives to deliver sustainable development that promotes high standards of design and creates safe, inclusive, and resilient communities.

The proposals have been developed with regard to the sites technical constraints and the key design principles discussed with Council officers to establish an appropriate proposal for the site.

## 3.2 EMERGING FRAMEWORK MASTERPLAN

Initial technical considerations indicate that land at Stamford Road could provide an indicative capacity of approximately 94 homes. The development seeks to provide a scale and mix of housing that respects the relationship with the wider area.

New housing could include smaller units for first time buyer and down-sizers. The masterplan is based around a simple perimeter block structure. The development would relate closely to the topography of the land and would be defined by high quality tree-lined streets. Development along the western edge will back onto existing housing on Catmose Park Road, with long gardens protecting the amenity of these properties. The materials palette will draw upon the rich built and landscape heritage of Oakham, with high quality materials for both buildings and the public realm.



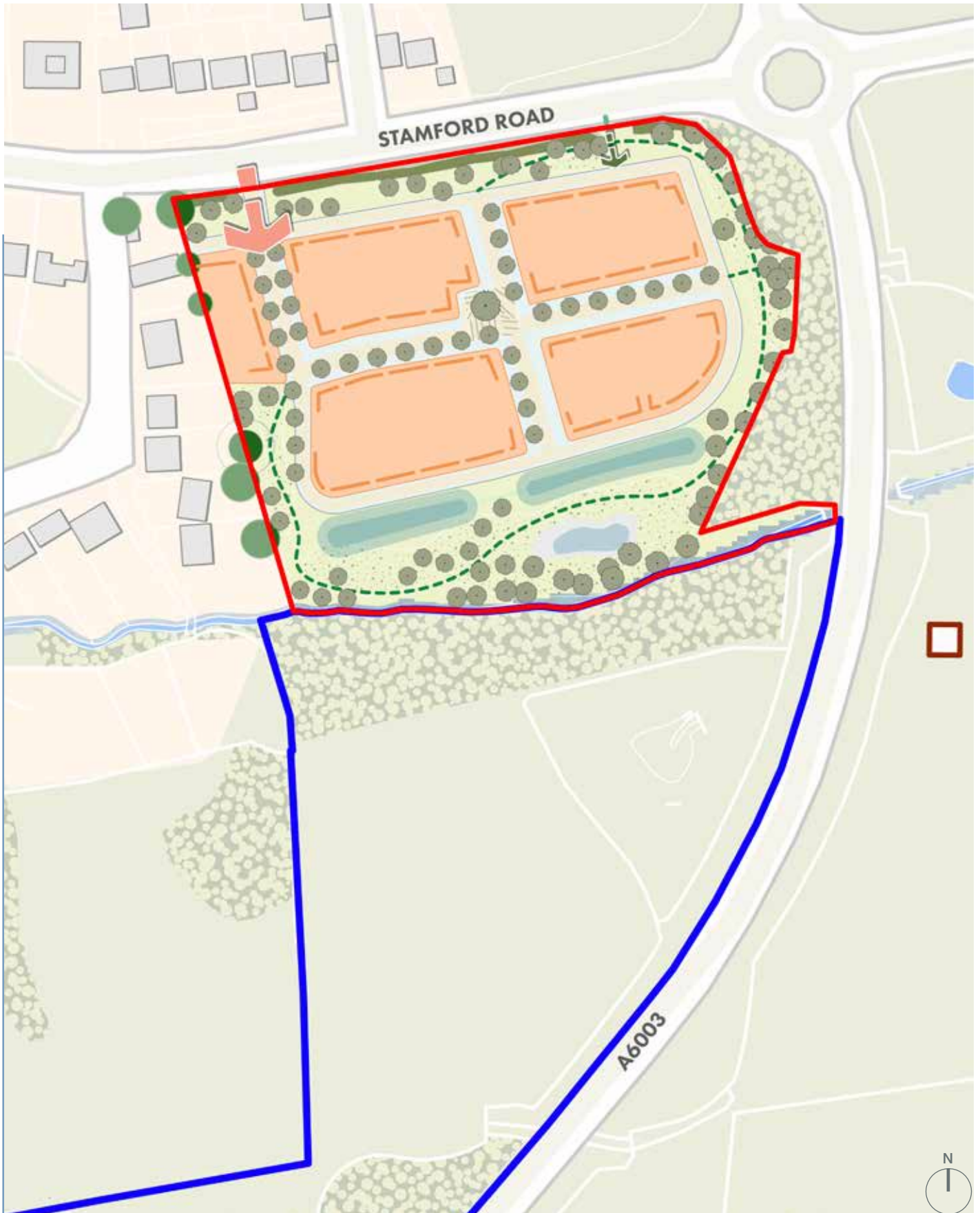


Figure 8. Masterplan

KEY

- |   |   |   |
|---|---|---|
|  Site Boundary                       |  Proposed Footway / Cycleway |  Proposed Open Space    |
|  Other Land under the same ownership |  Proposed Street             |  Proposed Wildlife Pond |
| Access:   | Development:  |  Proposed SuDS          |
|  Proposed Access                     |  Proposed Development Blocks |  Proposed Trees         |
|  Emergency Access                    |  Proposed Frontage           |  Existing Trees         |

### 3.3 DESIGN APPROACH

#### STAMFORD ROAD FRONTAGE

The approach along Stamford Road is an important gateway into Oakham. The proposals could deliver a new entrance to the town that draws inspiration from the landscape heritage of the area. The masterplan continues the character of Stamford Road, with high quality development frontage set back in landscaped space.

Improvement would be made to the existing hedge along Stamford Road, with the potential to reinforce and enhance this feature to soften the visual impact of development.

#### LANDSCAPE

The proposed landscape would respect the existing character of Stamford Road and the Conservation area, alongside the strong GI network that defines the wider area. The site offers the opportunity to set the proposed housing within a network of high quality green spaces, that draw reference from the landscape setting of the adjacent conservation area. The quality of the public realm will play a key role in creating a quality place and a strong sense of identity for the development. Public open space would provide green corridors and the potential for a new play area, adding to the network of play spaces in this area, and link to the development to the north of Stamford Road. The landscape proposals include:

- A green setting to Stamford Road, with development set back behind a landscaped edge
- Reinforcing the existing landscaped buffers to the west, south and east of the site, with public open space, meadow and tree planting
- Tree lined streets are proposed within key streets to green the built development

- A circular footpath around the periphery of the site
- A landscape space around the existing large stature trees to the west of the site
- A natural green corridor with sustainable drainage features supporting habitat creation and storm water attenuation along the southern boundary.

#### ECOLOGY

The proposals would enhance the biodiversity of the site. This will include the creation of semi-improved grassland, new tree planting and the enhancement of the existing hedgerow. A 10% Biodiversity Net Gain should be achievable within the site.

#### MOVEMENT

Access is proposed via Stamford Road to the north of the site, which includes vehicular, pedestrian and cycle links. The entrance to the site would be defined by a tree lined street that leads you into the heart of the development. A second pedestrian and cycle access is also provided to the north-east of the site onto Stamford Road, which could also serve as an emergency vehicular access.

The site has been designed to be accessible for all. Streets will be designed to give priority for pedestrians and cyclists. The site links directly to the existing long-distance footpath network along Stamford Road, providing access into the town and countryside.



Photograph – The site - looking at the settlement edge to the northwest



## CONCLUSION

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The vision for the proposed development of land at Stamford Road would include delivery of approximately 94 homes and support the Council's strategic objectives set out in the emerging Local Plan. The proposed development of the site offers the opportunity to create a new gateway to Oakham from the east to form a comprehensive and integrated extension to the town.

Development of the site would:

- Contribute to the required new housing in the area, increasing the choice of homes and providing affordable ownership options in addition to family housing in a high quality environment;
- Integrate into the eastern edge of Oakham, with connections to the town centre via existing footpaths and cycle routes;
- Include valuable open space, with housing designed around a series of green spaces that link the scheme to the wider area;
- Reinforce existing landscape features to create a variety of new green spaces linked between the new community, the open countryside and Oakham.

# SUMMARY OF BENEFITS



## SOCIAL

- Provide development which allows Oakham to grow and which forms part of the wider community
- Provide high quality market and affordable homes to meet housing need



## CONNECTIVITY

- Sustainable connections into the surrounding development areas, to support the wider connectivity of the town
- The open space network will support new recreational walking routes
- New homes will improve the viability of public transport connections



## ENVIRONMENTAL

- Over 30% of the site is open space providing opportunities for environmental enhancement while supporting healthy lifestyles
- Provision of SuDS and sensitive water management features
- Provide a net gain in biodiversity and a robust approach to surface water drainage

**URBAN  
DESIGN  
STUDIO**



Produced by:  
Savills Urban Design Studio  
Wytham Court, 11 West Way, Oxford OX2 0QL



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## Appendix 3 – Correspondence with Anglian Water

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**From:** Lyon Richard <rLyon@anglianwater.co.uk>  
**Sent:** 08 October 2020 14:51  
**To:** Ed Rehill <ed.rehill@savills.com>  
**Cc:** Planning Liaison <planningliaison@anglianwater.co.uk>; Olim Sandra <sOlim@anglianwater.co.uk>  
**Subject:** Re: Oakham Sewage Treatment Works

**EXTERNAL EMAIL: Be cautious when opening attachments or clicking links**

Hi Ed

I would imagine that past reference to 350m is based on earlier advice we've provided to local planners, which itself was based on the Environment Agency's H4 guidance issued c.2012. The H4 guidance had the general effect of pushing assessors to consider the lower odour concentration threshold of  $1.5 \text{ OU}_E/\text{m}^3$ , probably unintentionally. As you may imagine, this lower concentration is detectable at a substantially greater range from the source.

Subsequent research and analysis has driven a revision of the water industry's position in general and current thinking broadly reflects guidance issued by the Institute of Air Quality Management ([www.iaqm.com](http://www.iaqm.com)), which is better focussed for assessing the smaller WRC.

Our assessments are now based on the  $3 \text{ OU}_E/\text{m}^3$  threshold and as such I can confirm that the 250m range has superseded previously advised indicative risk ranges.

Regards

**Richard Lyon**

Pre-development Senior Engineer  
Development Services

**Anglian Water Services Limited**

Thorpe Wood House, Thorpe Wood,  
Peterborough, Cambridgeshire, PE3 6WT  
Tel. 03456 066087 *then select Option 1*  
[www.anglianwater.co.uk](http://www.anglianwater.co.uk)





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**From:** Ed Rehill <[ed.rehill@savills.com](mailto:ed.rehill@savills.com)>  
**Sent:** 08 October 2020 10:14  
**To:** Lyon Richard <[rLyon@anglianwater.co.uk](mailto:rLyon@anglianwater.co.uk)>  
**Cc:** Planning Liaison <[planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk)>; Olim Sandra <[sOlim@anglianwater.co.uk](mailto:sOlim@anglianwater.co.uk)>  
**Subject:** RE: Oakham Sewage Treatment Works

**\*EXTERNAL MAIL\* - Please be aware this mail is from an external sender - THINK BEFORE YOU CLICK**

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Hi Richard,

Thank you very much for the information, very helpful.

I have been trying to obtain a map showing the cordon sanitaire from Rutland County Council for a while. They sent through the attached map late yesterday afternoon which defines a cordon sanitaire with a radius of 350m.

The extent of the development, to the west and north west of the WRC, built in late 90's/early 2000's does seem to reflect 350m radius.

Can you advise if the 350m radius is now superseded by the approx. 250m distance?

Kind regards,

**Ed Rehill**  
**Associate**  
**Planning**

Savills, Ground Floor, Hawker House , 5-6 Napier Court , Napier Road , Reading RG1 8BW



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Website : <http://www.savills.co.uk>



 Before printing, think about the environment

**From:** Kerry Andrews <KAndrews@rutland.gov.uk>  
**Sent:** 07 October 2020 16:33  
**To:** Ed Rehill <ed.rehill@savills.com>  
**Cc:** Rachel Armstrong <RArmstrong@rutland.gov.uk>  
**Subject:** FW: Oakham Sewage Treatment works + Oakham Neighbourhood Plan

**EXTERNAL EMAIL: Be cautious when opening attachments or clicking links**

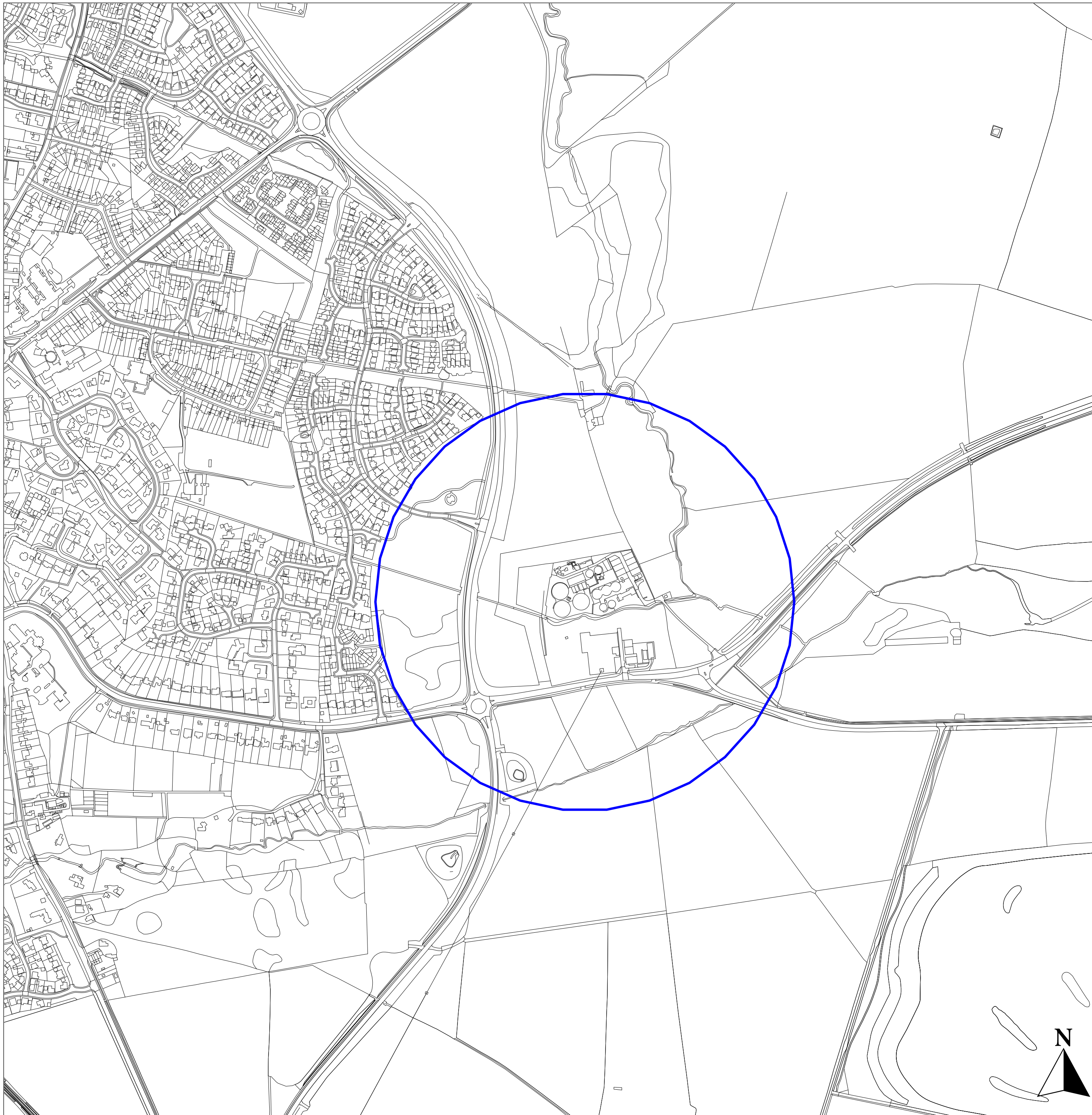
Hi Ed

Please find attached a map of the cordon sanitaire. Hope that helps but let me know if I can support further

Many thanks  
Kerry

**Kerry Andrews** | **Planning Policy Officer**  
Catmose, Oakham, Rutland LE15 6HP  
t: 01572 758853 | e: [kandrews@rutland.gov.uk](mailto:kandrews@rutland.gov.uk)  
[www.rutland.gov.uk](http://www.rutland.gov.uk)

*Details regarding your data protection rights and how the Council processes your data can be found at: [www.rutland.gov.uk/my-council/data-protection](http://www.rutland.gov.uk/my-council/data-protection)*



# Rutland County Council

The Oakham Sewage Treatment Works Cordon Sanitaire has a radius of 350m.

**Legend**  
[Blue square] Oakham Sewage Treatment Works Cordon



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Director

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