



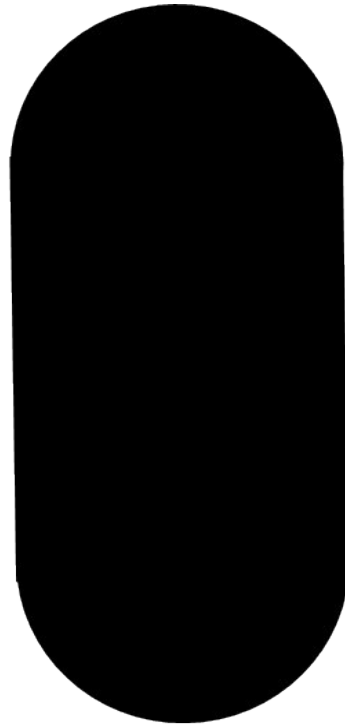
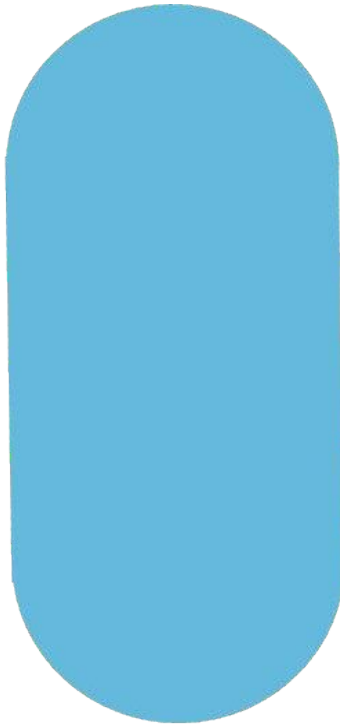
 Part of Shakespeare Martineau

Representations to the Rutland Local Plan Regulation 19 Consultation

Land at Seaton Road, Glaston

Jeakins Weir Limited

December 2024



1. Introduction

- 1.1. This representation is made on behalf of Jeakins Weir Limited in respect of their interests on Land at Seaton Road, Glaston (the Site). This site is available now and deliverable with no fundamental technical constraints. Given that it is within the adopted PLD for Glaston and due to its previously developed nature, delivery of the site for residential development is supported by the provisions of the adopted development plan.
- 1.2. This consultation sets out Jeakins Weir's views in respect of the Rutland Local Plan Regulation 19 Pre-Submission Consultation. This document is currently the subject of consultation and representations are invited until 2nd December 2024.
- 1.3. This representation confirms our ongoing support for the Site and outlines the extent to which this site would conform to, and reinforce, the Council's spatial strategy and wider aspirations to deliver sustainable development.

2. Background and Context

- 2.1. The National Planning Policy Framework of December 2023 (NPPF) confirms at paragraph 15 that the planning system should be genuinely plan-led. The presumption in favour of sustainable development applies to plan making and says that plans should positively seek opportunities to meet the development needs of their area, and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (paragraph 11).
- 2.2. Plans should be prepared positively, in a way that is aspirational but deliverable and be shaped by early, proportionate and effective engagement between plan-makers and, inter alia local people and businesses. They should also contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).
- 2.3. Paragraph 20 says that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), and community facilities (including education). Paragraph 22 goes onto say that strategic policies should look ahead over a minimum 15 year period from adoption and larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.
- 2.4. Paragraph 23 of the NPPF says that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 2.5. Paragraph 31 says that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
- 2.6. Paragraph 32 recognises the legal requirement for local plans to be informed throughout their preparation by a sustainability appraisal demonstrating how the plan has addressed

relevant economic, social and environmental objectives (including opportunities for net gains). It highlights that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

2.7. Plans should set out the contributions expected from development, including the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for health). This should not undermine the deliverability of the plan (paragraph 34).

2.8. For a plan to be adopted it must pass an examination and be found to be 'sound'. Paragraph 35 identifies that plans are 'sound' if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.9. Paragraph 60 of the NPPF says that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed.

2.10. Paragraph 61 of the NPPF says 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 – unless exceptional circumstances justify an alternative approach and paragraph 62 confirms that within this context, the size,

type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

- 2.11. Paragraph 67 of the NPPF says that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.
- 2.12. Paragraph 69 of the NPPF says that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 2.13. Paragraph 74 of the NPPF says that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.
- 2.14. Paragraph 76 says that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies.
- 2.15. Paragraph 82 recognises that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.
- 2.16. Paragraph 97 says that to provide the social, recreational and cultural facilities and services the community needs, planning policies should take into account and support the delivery

of local strategies to improve health, social and cultural well-being for all sections of the community.

- 2.17. Paragraph 180 says that planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes (in a manner commensurate with their statutory status or identified quality in the development plan) and recognising the intrinsic character and beauty of the countryside.
- 2.18. The national policy context for plan making is clear in that:
- 1) the plan must set out an overall strategy for the pattern of development that makes sufficient provision for housing to meet the needs of Rutland as well as any needs that cannot be met within neighbouring areas;
 - 2) the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned.
 - 3) Plan for and allocate sufficient sites to deliver the strategic priorities of the area;
 - 4) that a sufficient amount and variety of land can come forward where it is needed;
 - 5) Plans should be positive, aspirational and be responsive to changes in local circumstances;
 - 6) strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations;
 - 7) a sufficient supply and mix of sites, including small and medium sized sites and larger scale development, should be identified such as new settlements or significant extensions to existing villages and towns; and
 - 8) the intrinsic character and beauty of the countryside should be recognised and valued landscapes protected.

3. Rutland Local Plan – Regulation 19 Consultation

3.1. The Local Plan establishes the Council's long term spatial planning strategy for delivering and managing development and infrastructure, and for environmental protection and enhancement across the emerging plan period (2021-41). Upon adoption the emerging Local Plan will supersede the currently adopted Core Strategy DPD and Site Allocations and Policies DPD.

Vision

3.2. The plan contains a Vision for Rutland through to 2041 alongside a number of strategic objectives. The Vision places a focus on addressing the impacts of climate change and the need to become carbon net zero, but importantly recognises the need to support the delivery of a range of high-quality housing that meet the County's minimum housing need and which meets the needs of all sections of the community, including affordable homes.

3.3. Central to the Vision is that the market towns of Oakham and Uppingham will continue to be the main focus for additional housing and employment growth.

3.4. The strategic objectives include:

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

3.5. We are broadly supportive of the local plan Vision and strategic objectives, and it is positive that the needs of all sections of the community are being appropriately considered in respect of good quality housing and their needs for affordable housing. Similarly, the

recognition that Oakham will remain the main focus for additional housing is both logical and a sustainable approach.

- 3.6. It is clear that addressing the impacts of climate change is a principle focus within the Vision and the Local Plan more generally. We recognise the importance of this issue, and the delivery of sustainable development should be recognised as a crucial element in both meeting needs with the spatial strategy an important piece in how this will occur.

Housing Need

- 3.7. Policy SS1 (Spatial Strategy for New Development) makes provision for at least 123 dwellings per annum (dpa) over the plan period from 2021 to 2041, as well as a minimum of 16ha for new employment generating uses over the same period.
- 3.8. The figure of 123 dpa is Rutland's Local Housing Need (LHN) figure calculated using the Standard Method. The Planning Practice Guidance (PPG) makes clear that the LHN is only a starting point. The Standard Method does not produce a housing requirement and there are instances where it may be appropriate for the housing requirement to be greater than the LHN.
- 3.9. The Standard Method does not predict the impact of future government policies, changing economic circumstances or other factors might have on demographic behaviour. Additionally, growth strategies that are likely to be deliverable, strategic infrastructure improvements and requirements to accommodate unmet needs from neighbouring areas may also indicate a housing requirement greater than the minimum LHN figure.
- 3.10. The PPG advises that upward adjustment to the LHN may also be considered in situations where previous levels of delivery in an area, or previous assessments of need (such as recently produced Strategic Housing Market Assessments) are significantly greater than the outcome from the standard method. Relatedly, local planning authorities should also consider through their evidence base whether the overall housing requirement will deliver sufficient new homes to meet identified needs for affordable housing arising over the plan period.
- 3.11. The need to meet affordable housing is also a key requirement to meeting the housing needs of an area and one which could give rise to the Council considering specific increases to the percentage ratio of affordable housing provision on specific strategic allocations to enable longstanding unmet and urgent affordable housing needs in the area

to be accelerated. This could include, as stated in NPPF paragraph 66(d) a significant percentage requirement on a site or possibly 'exclusively' for affordable housing on a proposed site. Such housing provision could also include homes for first time buyers or discount market housing schemes.

Past Housing Delivery

- 3.12. The Council's published monitoring data indicates that between 2006 and 2024 Rutland has delivered an average of 157 dpa. The emerging housing requirement of 123 dpa is almost 25% lower than average historic delivery since 2006/2007. This in itself provides a compelling reason for an upward adjustment to the housing requirement.

Affordable Housing

- 3.13. Meeting affordable housing need over the plan period can be a further reason to plan above the LHN.
- 3.14. In the 12-year period between 2011 and 2022 the gross affordable housing completions average to 29 affordable homes per annum within Rutland. This falls short of the adopted 2011 Core Strategy's target of 40 affordable homes per annum, this level of delivery is set against a backdrop of completions higher than that being pursued within the draft Local Plan.
- 3.15. It stands to reason that a reduction in the base housing requirement to a level well below historic delivery trends will suppress affordable housing delivery within Rutland where housing affordability is a pressing issue.
- 3.16. The more recent 2023 SHMA suggests a need for 78 affordable homes per annum, yet paradoxically concludes that an uplift to the emerging local plan's housing requirement is not necessary to accommodate affordable needs alone (though such an uplift may be required for other reason).
- 3.17. The reason stated in the 2023 SHMA is that the link between affordable need and overall need is complex and "*in trying to make a link it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home.)*" Despite that statement, the 2023 SHMA concludes that "*the level of affordable need does suggest the Council should maximise the delivery of such housing at every opportunity.*" It is clear that formulating the housing requirement represents such an opportunity, and one that is clearly necessary to take.

- 3.18. Even if 78 dpa was an over-estimation of affordable needs within Rutland, it is only marginally less than three times the level of gross average annual affordable housing delivery over the last 12 years and almost twice the target of the adopted 2011 Core Strategy of 40 affordable homes per annum.
- 3.19. Adopting a housing requirement analogous to the LHN (123 dpa) which is significantly less than historic average delivery will likely not meet even the Core Strategy's modest and now very dated affordable housing target.
- 3.20. The evidence base clearly suggests that the local planning authority should be considering an uplift to the housing requirement in order to bring forward sufficient affordable housing over the plan period to meet needs. Unfortunately, this is not reflected in the emerging local plan or in its housing requirement.
- 3.21. Accordingly, an upward adjustment should be made to the housing requirement to maximise opportunities for affordable housing delivery, against the clear backdrop of Rutland's affordability issues.

Proposed Revised Standard Method

- 3.22. The revised Standard Method published alongside the proposed reforms to the NPPF identify a significantly higher local housing need for Rutland at 264 dpa, rather than the 123 dpa under the current method and contained within the draft Local Plan, this represents an increase of 115% above that currently being sought. Across a 20-year plan period this represents an additional 2,820 dwellings¹.
- 3.23. It is recognised that the revised Standard Method is not yet adopted, and the transitional arrangements outlined within the consultation draft NPPF will enable the Council to continue to progress their Local Plan under the framework of the December 2023 NPPF, but shortly thereafter a Local Plan Review will be required which will need to consider the increased housing need. This position has been recognised by the Council with the latest Local Development Scheme setting out timeframes for both the Local Plan and a subsequent Local Plan Review which will immediately follow adoption.

¹ 264 dpa over a 20-year plan period equates to 5,280 dwellings.

- 3.24. It would be prudent for the Council to enable additional housing delivery through the identification of further housing allocations, alongside criteria where development will be supported at these sites, this should include in circumstances where the Council is unable to demonstrate a 5-year housing land supply.

Conclusion on Housing Need

- 3.25. The 2023 SHMA in respect of the housing requirement concludes as follows:

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

- 3.26. Unfortunately, this key recommendation has not filtered down into the housing requirement which adopts the minimum figure of 123 dpa, without considering whether any upward adjustments are reasonable and possible.

- 3.27. The evidence base is unequivocal: a higher figure than the LHN should be adopted as the housing requirement, based on data across a range of factors and from a range of sources.

- 3.28. In our view, it is essential for the Council to adopt a figure in excess of the Standard Method/LHN on the basis that it has historically delivered materially in excess of it; yet any consideration of an upward adjustment to the LHN is absent from the local plan itself or its evidence base. If this is not rectified, then the local plan if adopted in its current form will be unsound for want of justification given that its housing requirement is completely adrift with the evidence base.

Spatial Strategy

- 3.29. NPPF Paragraph 109 requires the planning system to actively manage patterns of growth in support of limiting the need to travel and offering a genuine choice of transport modes to reduce congestion and emissions. The identification of a hierarchy of settlements based on the availability of day-to-day services and facilities required to support daily living and sustainable travel is therefore an important tool, which should be used to understand the sustainability of different locations within the plan area and, accordingly, their ability to accommodate growth sustainably.

- 3.30. Policy SS1 focuses the majority of new development within the Planned Limits of Development (PLDs) of Oakham and Uppingham, and on land adjacent to Stamford North as part of an urban extension.
- 3.31. Given that these settlements are Rutland's primary towns, or are located adjacent to neighbouring settlements, this is understandable and appropriate. Oakham is the most sustainable settlement in Rutland and should accommodate a significant portion of growth commensurate with its position in the settlement hierarchy.
- 3.32. The policy has been amended following the Regulation 18 consultation and now makes reference to supporting the reuse and/or redevelopment of land within the defined St George's Barracks and Woolfox Opportunity Areas.
- 3.33. The Council sought to rely on a new sustainable community at St Georges Barracks in the withdrawn Local Plan 2018-2036 and the failure to achieve suitable funding was the principal reason the plan had to be abandoned. Seeking to rely on the site, alongside the Woolfox Opportunity Area, risks a similar scenario. It is recognised that the spatial strategy does not directly rely on delivery to meet the LHN identified but we would caution against reliance on such sites as part of any Local Plan Review given the well known viability and deliverability issues in these locations.
- 3.34. Policy SS2 sets out that proposals for development on sites which adjoin the Planned Limits of Development of Oakham and Barleythorpe, Uppingham and the Larger Villages (as listed in SS1b) may be permitted based on three criteria:
- 1) *major housing applications only where it is clearly evidenced that the proposal is needed to maintain a sufficient supply of deliverable and developable housing land (usually a 5 year land supply), in accordance with the requirements of national planning policy and Policy SS1 of this Local Plan; or*
 - 2) *small scale housing proposals for infill and redevelopment in accordance with Policy SS3; or*
 - 3) *local business and community needs, where the site makes use of previously developed land and is physically well related to the existing built form;*
- 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)*

- 3.35. Policy SS2 provides a small level of flexibility in enabling additional sites to be brought forward in circumstances where housing land supply is under strain in accordance with NPPF paragraph 11d. However, where the Regulation 18 draft Local Plan included a number of reserve sites which “may be required if the housing requirement increases” this element has been removed from Policy H1 in the Regulation 19 draft. It is recognised that a 10% buffer has been applied to the minimum housing requirement, but as detailed in our representations on housing need, it is essential for the Council to adopt a figure in excess of the LHN on the basis that it has historically delivered materially in excess of it and the significant affordable housing need in the area. A simple 10% buffer in this case is considered ineffective, not positively prepared nor creates for a justified strategy as required by NPPF paragraph 35.
- 3.36. Supply-side contingency should not be identified as a way to address concerns about the robustness of the housing requirement. Similarly, contingency should not be identified as a way to address uncertainties over the deliverability of the supply. Rather, deliverable sites should be selected from the outset and contingency added to these to ensure flexibility to respond to changing circumstances. There are a number of sites which we anticipate will either encounter delay or non-delivery and thereby impact the Council’s spatial strategy.
- 3.37. This further reinforces our view for a greater supply contingency allowance than 10%, which should be set against a robust housing requirement figure rather than the minimum LHN figure. Given the uncertainties associated with the emerging local plan’s spatial strategy and the individual sites it relies upon, we would suggest that a 20% supply buffer would be more appropriate.
- 3.38. Furthermore, the spatial strategy and detail of sites contained within Policy H1 sets out that 55% of the residual requirement is to be met via the Stamford North site against just 8% to be brought forward at Oakham and Barleythorpe. There is a clear risk that such an approach which is heavily reliant on delivery from a single complex site, which itself is reliant on delivery of a new distributor road and is yet to receive outline planning permission will encounter delays that impact the anticipated housing trajectory and ultimately the ability to meet the LHN being pursued.
- 3.39. It is clear that the spatial strategy should refocus on Oakham as the principal and most sustainable settlement in the County with further housing met in this location. The approach being pursued based on the LHN and a 10% buffer is insufficient and not positively

prepared. The consideration of the Future Opportunity Areas at St. George's Barracks and an area of land at Woolfox which have well known and significant viability and deliverability constraints, rather than seeking growth at Oakham is irrational given the Council's previous emerging Local Plan 2018-2036 had to be withdrawn following the failure to achieve suitable funding for the Barracks redevelopment.

Approach to Planned Limits of Development

- 3.40. In respect of the Spatial Strategy within Policy SS1 and the interaction with Smaller Villages such as Glaston, the Policy sets out that *“development will be limited to small scale redevelopment and infill opportunities only”*, with infill development defined as a small site within a substantially built-up frontage. The Policy expects that housing development on such sites will usually be of 1-2 new dwellings, although exceptionally there may be sites which yield up to a maximum of 5 dwellings. This results in no net growth apportioned through the emerging local plan to those settlements 2020-2040.
- 3.41. In contrast to the larger villages where windfall sites within the Planned Limits of Development (PLD) are supported, that approach will not be duplicated for settlements designated as smaller villages and hamlets which will no longer have PLDs. That is a departure in the approach from the adopted development plan. Policy CS3 of the 2011 Core Strategy contains a multi-tiered settlement hierarchy for the rural area which, at the bottom end of the hierarchy, distinguishes smaller service centres from the restraint villages. The Site Allocations and Policies Development Plan Document (DPD) adopted in October 2014 sets out at Policy SP5 that sustainable development within the PLDs of Oakham, Uppingham and the villages will be supported subject to a number of site-specific criteria in relation to design, amenity and other considerations. That approach applies to the villages identified in Policy CS3 of the Core Strategy, in other words all identified settlements in Rutland had a PLD and a framework to encourage the sustainable reuse of land for development within the PLDs.
- 3.42. In contrast to the approach of the adopted development plan, the emerging local plan proposes to delete PLDs at a significant number of rural settlements including those that had previously been classified as smaller service centres, such as Glaston. The rationale for this is explained in the Background Paper: Spatial Strategy for New Development at paragraph 5.16. In essence, the deletion of the PLDs is held out as being an opportunity to consider development proposals more flexibility and on their own merits in the county's smaller rural settlements, subject to a defined policy criteria and a limit on the number of units being proposed.

3.43. On behalf of our client, we object to this approach and the rationale behind it. Whilst a criteria-based policy can always be considered for sites that may strictly fall outside of the PLDs but which can still come forward sustainably, deleting PLDs for the smaller villages and hamlets will not encourage flexibility for suitable windfall sites to come forward. It is likely to have the opposite effect, as there will be a lack of clarity as to where the practical limits of the villages lie and the overall development management approach to proposals within these areas.

3.44. Taken cumulatively the approach of Policy SS1 in respect of the smaller rural settlements is overly restrictive and will discourage suitable windfall sites from coming forward within the county's smaller rural settlements. This is the opposite outcome than is being pursued through the removal of the PDLs and contrary to the advice of paragraph 70 of the National Planning Policy Framework which requires local planning authorities to, amongst other things, support the development of windfall sites through their policies and decisions, giving great weight to the benefits of using sites within existing settlements for homes. The Planning Practice Guidance (PPG) similarly states:

“A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness.”

3.45. The importance of delivery at the existing Smaller villages and Restraint Villages in windfall delivery is identified within the Small Sites Windfall Housing Study (September 2022). Table 3 confirms that between 2006 and 2022 Smaller and Restraint Villages contributed 328 dwellings through small site windfall completions, equating to 56% of the total 591 dwellings.

3.46. Policy SS3 - Small scale development on the edge of settlements limits development opportunities to maximum of 5 dwellings as being “*very small in scale*” alongside a number of criteria that must be met, including the need to “*demonstrate clear evidence of substantial support from the local community*”.

3.47. The approach being pursued via the removal of PDLs in Policy SS1 and then the approach to small scale development in Policy SS3, which in reality is ‘very small scale development’, acts to constrict the ability of sustainable development to be delivered within small villages,

including Glaston, which would be acceptable under the current adopted policy framework that has historically enabled the majority of windfall sites across the County.

- 3.48. In order to overcome the above issues in relation to the rural growth strategy, the PLDs should be retained for the identified settlements and a criteria-based policy set out for when development outside of the PLDs may be appropriate in these areas, which should provide the level of flexibility desired. Alternatively, a clearer and more positive policy framework to encourage the delivery of suitable windfall sites within the smaller villages and hamlets and importantly at land well-related to these tiers of settlements should be considered. As drafted, Policy SS3 places a stricter definition on small scale development than applied within the NPPF, which defines major development as being where 10 or more homes will be provided. Policy SS3 is therefore not positively prepared or consistent with national policy as required by paragraph 35 of the NPPF and must be amended.

Sustainability Appraisal

- 3.49. For context, the Sustainability Appraisal (SA) Report to accompany the Pre-Submission Local Plan applied three variables for the purposes of the appraisal of the growth strategy options:
- **123 homes per annum:** The current national standard method figure for housing need in Rutland is 123 homes per annum.
 - **160 homes per annum:** This reflects current delivery levels in Rutland during the initial part of the plan period since 2021.
 - **210 homes per annum:** In theory higher housing numbers could be delivered in Rutland through the Local Plan to support economic growth in the county.
- 3.50. The SA tested 5 growth strategy options as reasonable alternatives:
- Option 1: Oakham, Uppingham NP allocations, Quarry Farm and brownfield sites. This option would deliver 2,907 dwellings over the plan period.
 - Option 2: Oakham, Uppingham NP, Quarry Farm, brownfield sites and small greenfield sites in larger villages. This option would deliver 2,985 dwellings over the plan period.
 - Option 3: Oakham, Uppingham NP, Quarry Farm, brownfield sites and medium greenfield sites in larger villages. This option would deliver 3,279 dwellings over the plan period.

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- Option 4: Additional sites in Oakham, Uppingham NP, Quarry Farm, brownfield sites, small greenfield sites in larger villages and medium greenfield sites in larger villages. This option would deliver 3,821 dwellings over the plan period.
- Option 5: Oakham, Uppingham NP, Quarry Farm, brownfield sites, small greenfield sites in larger villages and a new settlement. This option would deliver 3,985 dwellings over the plan period.

- 3.51. The SA concludes that preferred approach for the Local Plan is to direct growth to sustainable locations within Rutland, primarily focused within the planned limits of development (PLD). Aligning with Option 1 and Option 2, growth will be focused in Oakham, Uppingham (via Neighbourhood Plan allocations), Part of Stamford North (Quarry Farm), brownfield sites and small greenfield sites in larger villages.
- 3.52. SA Paragraph 7.2 sets out that; *“Specifically, provision is made in the new Local Plan for the delivery of at least 123 homes per annum (based on the standard housing method) with an additional allowance for flexibility. The new Local Plan therefore makes provision for 2,705 new homes distributed in accordance with the spatial strategy in Policy SS1.”*
- 3.53. Table 6.4 is clear that none of the 5 Options considered would have met the economic growth scenario at 210 dpa, so it is not clear how this variable has been thoroughly tested across the options.
- 3.54. Furthermore, the growth options considered by the SA include a number of sites considered across all five options. Quarry Farm (North of Stamford), for example, is a constant across all five options despite this site having no pre-existing planning status other than an undetermined planning application. The allocations within the Uppingham Neighbourhood Plan review are also treated as a constant across all of the options, despite the fact that examination of the Neighbourhood Plan has yet to conclude.
- 3.55. To the extent that a large number of sites appear across all five options, that does not represent a testing of genuine reasonable alternatives but rather different permutations of what is fundamentally the same spatial strategy.
- 3.56. For the above reasons, the SA does not present an appropriately robust testing of the preferred spatial strategy against the reasonable alternatives and that therefore the emerging local plan’s spatial strategy is not justified.

Policy H5

- 3.57. Policy H5 requires all new dwellings to be adaptable and accessible as defined in part M4(2) Category 2 Accessible and adaptable dwellings of the Building Regulations, unless, by exception only, where M4(2) is impractical and unachievable. The Policy continues that on sites totalling 50 or more dwellings, a minimum of 2% of all dwellings is required to meet part M4(3) of the Building Regulations. In relation to the requirement the policy clarifies that viability will not be an acceptable reason for failure to provide for M4(2) compliant dwellings, however, the viability of a development impacts whether a site will or will not be delivered. The Regulation 19 Viability Note (September 2024) produced in respect of the latest drafting updates the position in light of the increased M4(3) requirement and application to smaller sites. It concludes that the change is only a “modest cost” increase, but nonetheless may create viability issues where unknown costs are yet to be realised.
- 3.58. Policy H5, as worded, acts to restrict otherwise sustainable development where viability impacts occur in conflict with NPPF paragraph 16a and should be revised.

4. Representations in Respect of Land at Seaton Road, Glaston

- 4.1. Our client has an interest in Land at Seaton Road, Glaston which is located adjacent to the built-up area of Glaston. The site is located within the existing Planned Limit to Development for the village and the site represents a great opportunity to create a sustainable, distinctive and thriving extension to Glaston. Additionally, the site frontage is identified on the Brownfield Land Register brownfield.
- 4.2. The site comprises a single field at the southern extent of the village that is available and deliverable with no fundamental technical constraints. The site was screened out of the Site Allocation Assessment 2024 (SHELAA reference GLA01) on the basis that it was not within the PLD of a Larger Village.
- 4.3. In terms of connectivity, the site is well located within Glaston with access opportunities onto Seaton Road to the west. Glaston benefits from a direct bus connection to Stamford via the R5 route and can accommodate growth.
- 4.4. Our representations demonstrate the need for a higher housing requirement to be sought and additional allocation identified. This position is reflected in the Council's conclusion that an immediate Local Plan Review will be required. Furthermore, the approach within Policy SS1 and SS3 to remove the PDLs from Smaller Villages and limit development to a maximum of 5 dwellings conflicts with NPPF paragraph 35. Opportunities at smaller villages should be considered within the Plan and the PDLs retained to enable a clear framework of how and where development can come forward in these locations.



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