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REPRESENTATIONS TO REGULATION 19
PREFERRED OPTIONS DRAFT LOCAL PLAN
CONSULTATION
RUTLAND COUNTY COUNCIL

On Behalf of
Best Little Building Co. Ltd Ltd

November 2024

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1.0 INTRODUCTION

- 1.1 These representations have been prepared on behalf of Best Little Building Co. Ltd in response to Regulation 19 Pre-Submission Draft Local Plan Consultation being undertaken by Rutland County Council. These representations in particular concern a Site Land West of Steadfold Lane, Ketton (Site Plan attached as an Appendix to these Representations).
- 1.2 As set out in our previous Representations, Best Little Building Ltd is young and ambitious local building contractor which has grown from a sole trade business incorporated in 2015. The business focusses on high quality construction projects both domestic and commercial in the Rutland Area. In 2023 the company grew to a business of circa £7M turnover which employs 48 members of staff split between clerical and site based tradesmen. The employees all reside locally, and the business focusses its work within 30 mile catchment of its head office in Ketton, Rutland. All staff live within a 40 mile radius of the business, 3 members of staff live within Ketton and approximately 50% live within 5 miles of the business.
- 1.3 The business has strong roots in the local area and would like to remain based in the local area; Ketton has good links to main roads such as the A1, A43 and A47 which is integral to logistically servicing its job sites. The location is strategically beneficial as it does not compete with the larger contractors based in the major towns and cities close to Rutland.
- 1.4 The company has outgrown its existing headquarters building which is located at Unit 14 Chater Business Estate, Pit Lane, Ketton. The current office space is limited to 6no. people and the company already employs 7no. office staff with target growth within the next 5 years to 30-35no. office staff. The existing premises also has deficiencies in:
- internal storage- the premises has 1,000sqft space which has had an additional 1,000sqft added through the creation of a mezzanine. In 2024 (since the previous Representations), a further 1,000sqft storage space has been rented at the adjoining unit – Unit 15- with the intention of adding a further 1,000sqft mezzanine. **10,000- 12,000 sqft of office space is needed due to growth of the business.**
 - No space to store plant and machinery which instead has to be moved from site to site, exposing assets to theft and criminal damage. **A space of 5-6,000 sqft is required.**
 - No space available to undertake bespoke joinery which is integral to delivery of projects- **a space of 5,000sqft is required.**
 - Insufficient parking provision- current site only has 12 spaces but **approximately 50 parking spaces are required**
 - Lack of space for clients to visit and have meetings
 - No external storage space which is required for plant and materials

- 1.5 Best Little Building Co. Ltd has been in search of new accommodation within the local area with no success. The only available premises with sufficient space are in Peterborough. As such, they have sought to identify land opportunities to construct their own headquarters building to meet their own bespoke needs.
- 1.6 The Site identified by Best Little Building Co. Ltd was submitted as part of the 'Call for Sites' exercise undertaken in February 2022. Further Representations were made in support of allocation of the Site for development to the Regulation 18 Local Plan consultation; however, the Site has not been allocated for development in Pre-Submission Draft Local Plan currently being consulted on. These Representations therefore seek to further support the allocation of the Site at Steadfold Lane for employment development.
- 1.7 These Representations are also supported by an Economic Statement produced by Marrons and an updated Promotion Document produced by 24/Three which sets out how the Site could be delivered. These proposals re-locate the proposed access and reduce the overall quantum of development on Site.
- 1.8 Notwithstanding our Client's specific land interests, these representations have been prepared in objective terms and assessed against the prevailing planning policy framework, in particular the Government's guidance set out in the National Planning Policy Framework (NPPF) (December 2023) and the National Planning Practice Guidance (NPPG) (March 2014 as updated).
- 1.9 The purpose of the Planning System is to contribute to the achievement of sustainable development. As such, NPPF para 11 requires plans to apply a presumption in favour of sustainable development which for plan making means that:
- (a) all plans should promote a sustainable pattern of development that seeks to meet the development needs of their area, align growth and infrastructure, improve the environment, mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects.**
- 1.10 More specifically, the Preferred Options Draft Local Plan has been reviewed in the context of para 35 of the NPPF, which requires that, Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:
- **Positively Prepared** – the plan should be prepared based on a strategy which as a minimum seeks to meet objectively assessed needs, is informed by agreements with

other authorities, so that the unmet need of neighbouring authorities is accommodated where practical to do so, and consistent with achieving sustainable development;

- **Justified** – an appropriate strategy taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic matters; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant.

1.11 Paragraph 20 states that policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for housing, employment, retail and other commercial development.

1.12 Paragraph 22 States strategic policies should look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities.

1.13 The allocation of specific sites for development therefore needs to demonstrate compliance with the requirements of NPPF and the Glossary definitions.

2.0 REPRESENTATIONS TO CHAPTER 7- ECONOMY

2.1 These Representations are supported by an Economic Statement produced by Marrons which considers the Council's employment needs evidence and related policy in the Pre-Submission Draft Local Plan in the context of the business needs of Best Little Building Co. Ltd.

2.2 The Economic Statement sets out that:

- The NPPF is clear in its support for the rural economy and requires planning decisions to enable the expansion of all types of business in the rural area.
- The Rutland Industrial Market is constrained, currently operating with a an extremely low vacancy rate. The assessment of need takes no account of how this low vacancy rate might be addressed.
- Pursuing the mid-point of 26.6ha industrial floor space allocated in the Local Plan is likely to further constrain economic growth in Rutland.
- None of the allocated sites are suitable for Best Little Building Co. Ltd due to either location, size, immediacy of delivery or availability in the open market (further information below).
- The proposed Site offers the opportunity to help meet economic growth objectives within Rutland, whilst meeting the immediate need of a growing local business within Ketton.

2.3 The Council's Economic Strategy (2023) forms part of the evidence base for the Economic Chapter of the Pre-Submission Local Plan. The Economic Strategy recognises that there is a high degree of resilience among established businesses and acknowledges that to deliver a step change in economic growth trajectory the Council needs to attract new, and support existing, businesses to capitalise on technology and investment opportunities.

2.4 The objectives of the Economic Strategy include:

- supporting the vision and growth of existing SMEs
- Reducing barriers to economic activity
- maintaining a proactive plan for employment land, housing and natural capital
- providing opportunities for businesses to relocate to Rutland

2.5 The economic policies of the Local Plan do not adequately reflect the overall employment need for Rutland over the Plan Period and do not provide adequate flexibility to allow existing and new businesses, particularly SMEs, to grow. They therefore fail to support the delivery of the Council's Economic Strategy.

2.6 The subsequent sections of these Representations consider the specific Local Plan Policies.

3.0 POLICY E1- STRATEGIC EMPLOYMENT LAND ALLOCATIONS

- 3.1 The Employment Needs Evidence states (para 7.3) that a total of 26no. Sites were 'promoted' as being suitable for employment development. Additional evidence has been published as part of the current consultation exercise to provide further details on the individual site assessments.
- 3.2 The previous Regulation 18 consultation included the draft allocation of 8no. sites to provide a total of 37ha employment land. The current consultation reduces the total number of allocations to 6no., removing 2no. of the allocations on Pit Lane in Ketton, and reducing the total allocation of employment land to 26.4ha. Despite our Client's previous Representations in relation to 'need' for employment land in or around Ketton, the Council has reduced both the total amount of employment land allocated through the Plan by 10.6ha and also specifically within Ketton by a total of 8ha.
- 3.3 The area identified for each of the draft allocated sites appears to relate to the total site area rather than the employment floorspace to be delivered. The allocations do not take account of site constraints that might affect the development potential of the land or take account of other policies within the Plan which might constrain development. As an example, the mandatory requirement to deliver 10% Biodiversity Net Gain for new developments or the parking requirements for non-residential developments. This could have a significant impact upon the developable area of the Site
- 3.4 In relation to our Client's specific requirements, none of the allocated sites would meet their requirements as an existing business located in Rutland and looking to grow. The table below sets out why each of the allocations are not suitable:

Site Allocation	Site Location	Issues with Allocation
E1.1	Car Park 3, Rutland Showground, Oakham	High quality office environment not suitable for workshop, moving plant, manufacturing of joinery etc
E1.2	Uppingham Gate, Uppingham	Distance from A1 is a constraint as Best Little Building Co. Ltd are based along the A1 corridor. This Site would add an additional 30 minutes of travel time and distance to be travelled.
E1.3	Burley Appliances Ltd. Oakham	Site is too small and for use by Burley Appliances
E1.4	Land at Pit Lane, Ketton	Site is too small
E1.5	Woolfox Depot, Great North Road	Site is part of long-term mixed-use development with no immediate

		likelihood of the Site being brought forwards. Further, cost to purchase equivalent amount of land with planning permission would be difficult
E1.6	Land at Wireless Hill, South Luffenham	This site is for the use of CS Ellis Group, and their intention is to utilise it

3.5 In light of the above, it is not considered that the Sites allocated by Policy E1 provide sufficient space to provide for the required employment needs. The Sites which are allocated are either identified for specific needs of existing businesses or are dependent upon the delivery of new settlements. They are therefore either not immediately available or will not be available to the general employment market. Further allocations are therefore required in general and specifically in Ketton to address local employment needs.

3.6 Policy E1 is therefore not 'Positively Prepared', 'Justified', 'Effective' or 'Consistent with National Policy' and it is therefore not 'Sound'.

4.0 REPRESENTATIONS TO POLICY E2- EMPLOYMENT DEVELOPMENT ON UNALLOCATED SITES

- 4.1 In addition to the allocated sites included in Policy E1, Policy E2 seeks to be supportive of new employment development proposals within the Planned Limits of Development in the towns and larger villages. It provides no flexibility in relation to sites outside of but adjacent to the Planned Limits of Development. As detailed at Section 6.0, there is an inference in Policy SS8 that new non-residential development adjacent to the planned limits to development is also acceptable.
- 4.2 In light of the Representations made in relation to the Economic strategy in principle and the evidence provided in relation to Policy E1, providing flexibility in Policy E2 to allow new employment development adjacent to the Planned Limits to Development would create a significant opportunity to deliver additional employment land in sustainable locations. Policy E2 should therefore be amended to allow new employment development on land adjacent to the Planned Limits of Development of the towns and larger villages.
- 4.3 This would provide consistency both within the Local Plan and would reflect the overall sustainability objectives of the NPPF and Local Plan.

5.0 REPRESENTATIONS TO POLICY E4- RURAL ECONOMY

5.1 Section 6 of the NPPF relates to building a strong, competitive economy. Paragraphs 88- 89 specifically relate to supporting a prosperous rural economy and require Planning Policies to enable the sustainable growth and expansion of all types of businesses in rural areas both through the conversion of existing buildings and through well designed, beautiful new buildings (IP Emphasis).

5.2 Paragraph 89 continues:

Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.

5.3 Policy E4 is generally in the spirit of the NPPF in that it seeks to provide for the retention and expansion of existing businesses; however, it places a particular emphasis on the conversion of existing buildings which the NPPF does not. Policy E4 therefore should be updated to be in complete consistency with the NPPF Para 88 which explicitly allows for the construction of new buildings.

5.4 Despite appearing to be positively worded to support new economic development in the countryside, the second part of the Policy requires compliance with a total of 7no. criteria in order for development to be acceptable. These criteria are extremely restrictive and go beyond the requirements of the NPPF Para 89.

5.5 Policy E4 states that new employment uses in the countryside will only be permitted where they support the rural economy and could not reasonably be expected to locate within the Planned Limits of Development; and they would not undermine the delivery of strategic employment allocations. In contrast, NPPF Para 89 requires policies to recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements.

5.6 Policy E4 does not recognise the significant issues with sourcing appropriate land for new employment uses as currently experienced within Rutland. There has been a lack of supply of new employment and office accommodation in Rutland for many years despite adopted Local Plan Policies being supportive of such development within the existing built-up areas. These policies are therefore not effective in bringing forward new employment opportunities indicating a lack of available land supply. Policy E1 needs to be more positively worded to allow for new employment development outside of the limits of

built development to recognise land supply issues within the towns and villages. Reference to part ii) should therefore be removed from Policy E4.

5.7 Policy E4 is therefore not 'Consistent with National Policy' and should be updated to:

- Remove reference or more specifically define the circumstance in which it could be demonstrated that an employment use 'could not reasonably be expected to locate within the Planned Limits of Development';
- provide more flexibility to the circumstances in which employment uses can be located in the rural areas such as the expansion or relocation of existing rural businesses; and
- specifically allow for the construction of new buildings for employment uses.

6.0 REPRESENTATIONS TO POLICY SS8- NON RESIDENTIAL DEVELOPMENT IN THE COUNTRYSIDE

- 6.1 Policy SS9 more generally relates to non-residential development in the countryside. The thrust of the Policy is similar to Policy E4 and therefore the same comments apply in relation to clearly defining how it can be demonstrated that development cannot be reasonably accommodated within or adjoining the Planned Limits of Development of towns and villages.
- 6.2 In addition to the above, the Policy provides specific circumstances in which new non-residential development in the countryside would be permitted including point 5 **'new employment growth comprising... rural enterprise that creates local employment opportunities and supports the local economy and communities where no acceptable alternative can be identified within existing permitted or allocated sites, or within or through redevelopment of existing commercial premises'**.
- 6.3 Once again, the second part of the Policy sets out criteria (a-h), all of which need to be complied with in order for development to be acceptable. This includes part b) **'the amount of new build or alteration is kept to a minimum and the local planning authority is satisfied that existing buildings available elsewhere in the County are not suitable for the purpose'**.
- 6.4 Point a) requires a demonstration that **'development cannot be reasonably accommodated within or adjoining the Planned Limits of Development of towns and villages'**. This infers that non residential development adjacent to the Planned Limits of Development is acceptable albeit this is not reflected elsewhere in any policy within the Plan. Policies within the Plan are therefore not consistent and present a confusing Policy context.
- 6.5 This Policy is overly restrictive in relation to the type of new development allowed in the rural area, and the circumstances in which such development would be permitted. The NPPF paras 88-89 are significantly more positively worded to support the rural economy and do not place the same restrictions on the construction of new build development.
- 6.6 Further, in order for new build development to be acceptable it appears the Policy requires the assessment of buildings/sites across the whole County to establish whether there are suitable alternative premises. (re)locating employment development across a county wide area is unlikely to be acceptable for the majority of rural enterprise. There is no guidance in the NPPF that requires such an assessment to be made and therefore the Policy goes beyond the requirements of the NPPF. The Policy therefore needs to be amended to remove Part b)

of the second part of the Policy in order to be 'Consistent with National Policy' and therefore be 'Sound'.

7.0 LAND AT STEADFOLD LANE, KETTON

7.1 The land at Steadfold Lane, Ketton has previously been submitted as part of the Call for Sites process. The Site has been assessed as part of the Employment Needs Evidence but has not been allocated because:

Recommendation – Although broadly suitable as an extension to the sites south there are other more appropriate opportunities in Ketton which should be considered for employment development initially.

7.2 This assessment recognises that the Site is suitable, available and achievable for development. The allocated site within Ketton is also outside of the Planned Limits of Development and it is therefore not clear why the Site at Pit Lane is sequentially more suitable than the Site at Steadfold Lane.

7.3 The Council has also published its detailed Site Allocation Assessment which is included in the Housing and Employment Site Assessment Report (July 2024). The Site Assessment process includes a number of stages:

Stage 1- initial assessment of sites to screen out 'show-stopper' constraint or sites not located in accordance with the emerging spatial strategy

Stage 2a)- assesses the effect of the potential development of a site against a wide range of environmental, social and physical criteria

Stage 2b)- consideration of potential constraints in detail alongside advice from technical experts and using planning judgement to consider suitability of a site for allocation.

7.4 The Site is identified by Site ID 2646 and has been fully assessed by the Council in terms of its Suitability for development. The Site passed assessment Stage 1 and was therefore considered in more detail under Stages 2a) and 2b).

7.5 The Stage 2a) assessment concluded that the Site is located away from the Planned Limits to Development; however, there would be no significant constraints to development and may be suitable for employment use if no other more suitable site is available.

7.6 The Stage 2b) assessment includes more detailed technical considerations. The Stage 2b) assessment finds that there are a range of 'significant constraints' on the site which mean it is not suitable for employment uses unless no other more suitable site is available.

7.7 The table below sets out the technical comments raised by the Council and our response as to how the issues raised can be overcome. These Representations are also supported by a Site Promotion Document which provides an alternative site layout and access to address the comments raised.

Site Assessment Technical Comment	Response
<p>Trees</p> <p>There would be a significant loss of existing mature vegetation, hedgerow and trees from along the Steadfold Lane frontage due to the need for an industrial access which would not be advised.</p>	<p>Access relocated onto Stamford Road (A251). Whilst there is hedgerow to the Stamford Road frontage it is less dense and there is more opportunity to relocate/replant better quality hedgerow outside of visibility splays as part of the design of the new access.</p>
<p>Heritage Potential: Medium risk</p> <p>Moderate sized area within an archaeologically rich landscape and in close proximity to prehistoric funerary activity.</p> <p>Any application should be accompanied with an archaeological assessment, where the assessment reveals the presence of archaeological remains, it is likely there will be a requirement for appropriate mitigation to be secured by condition upon any future planning permission.</p>	<p>Any application can be subject to requirement for archaeological assessment.</p> <p>The presence of archaeology is a medium risk and consultation response from technical consultee indicates that comments can be overcome by condition.</p>
<p>Highways</p> <p>A full transport assessment will be required to support any future planning application to assess the impact of such a development and identify what mitigation is required.</p> <p>Given the industrial nature of the development Steadfold Lane is not considered suitable in its current form and will need to be upgraded and widened to accommodate two hgv's passing one another within it.</p>	<p>Noted- can be part of an application package. There is not an in principle objection and there is a suggestion that mitigation could overcome any issues raised.</p> <p>Access has been moved to Stamford Road to overcome this issue.</p>

<p>A 3m wide footway/cycleway will be required from the site to connect to the existing facilities on Stamford Road, including the provision of a suitable crossing point.</p> <p>Public transport infrastructure may need improving to encourage sustainable travel to and from the site.</p> <p>There will be a significant loss of existing mature vegetation, hedgerow and trees from along the Steadfold Lane frontage due to the need for an industrial access and 4.5 x 215m vehicle to vehicle visibility splays, which is likely to be a concern to ecology and forestry colleagues.</p> <p>In summary, the LHA are of the view that an adequate access can be achieved, but there will be significant off-site highway works required to mitigate the impact of the development. Given this, the LHA would support the allocation of this site, subject to the policy team reviewing ecology and forestry comments alongside our own.</p>	<p>As above, access relocated. Stamford Road already has a footway to both sides of the road connecting to Ketton.</p> <p>Relocated access would mean that closest bus stops to the Site access would be approximately 340m to the west on Stamford Road.</p> <p>As above, site access relocated.</p> <p>Note that the Local Highway Authority support the allocation of the Site. Comments can be overcome by relocating the access onto Stamford Road.</p>
<p>Landscape</p> <p>Site has not been assessed in terms of landscape sensitivity</p>	<p>Further technical work can be undertaken in relation to landscape impact; however, the backdrop to the Site in landscape terms is the adjacent quarry, together with its significant buildings and infrastructure.</p> <p>There is substantial opportunity as part of the development proposals to integrate substantial landscape planting, to use the topography of the Site to reduce the visual</p>

	prominence of the buildings and to incorporate high quality design to lessen visual impact.
<p>Overcoming Constraints</p> <p>A full transport assessment will be required to assess the impact of development and identify what mitigation is required.</p> <p>Given the industrial nature of the development Steadfold Lane is not considered suitable in its current form and will need to be upgraded and widened to accommodate two hgv's passing one another within it.</p> <p>This will have significant impact on existing hedgerow and ecology</p> <p>Located away from the PLD and has not been assessed for landscape sensitivity. Consideration will need to be given to impact of development on landscape in this location</p> <p>Ecology and archaeology mitigation measures may be required</p> <p>Grade 3 BMV - may require assessment of land quality to determine likely impact.</p> <p>Mineral safeguarding area may require detailed assessment</p>	<p>Noted</p> <p>Noted- access relocated in response</p> <p>Addressed above. The relocated Site access has potential to re-plant higher quality hedgerow and offer gains to ecology and biodiversity.</p> <p>As above- further landscape assessment can be undertaken; however, site is located in context of adjacent quarry.</p> <p>Noted, can be required by planning conditions.</p> <p>Further assessment can be undertaken.</p> <p>Further assessment can be undertaken; however, this issue is the same for the Site allocated in Pit Lane, Ketton which is also located in a minerals safeguarding area.</p>

7.8 As presented in previous sections of these Representations, the Council has a significant need for employment land provision and our Client has a specific identified need in Ketton. It is

unclear why allocated Sites in Ketton have been reduced since the previous Regulation 18 Consultation, particularly in light of our previous Representations which set out the specific need of our client for employment land in the local area.

- 7.9 The Site at Steadfold Lane should be allocated in addition to the Site at Pit Lane due to the significant employment needs both locally and across the County. The consideration of whether there are more suitable sites which should be allocated in preference is therefore not relevant to the allocation of the Steadfold Lane Site.
- 7.10 Best Little Building Co. Ltd are in immediate need of a new Site for the provision of a new headquarters building having outgrown their existing premises. They are an established local business already based in Ketton and have been unable to secure any other available land to relocate their business. Best Little Building Co. Ltd have a direct interest in the land submitted as part of the previous Call for Sites exercise. The Site is therefore 'available' and 'achievable' for development immediately. There are no known viability issues with development of the Site.
- 7.11 The Site at Steadfold Lane would offer additional employment and office space to specifically meet identified needs for small scale units in the rural area. The Site is available immediately to provide for the immediate needs of the market. There are no constraints to the site development and the Employment Needs Evidence identifies the site as suitable for development. In light of the identified issues with the strategic allocations at Policy E1, the Site as Steadfold Lane should be allocated for development.

8.0 CONCLUSIONS

- 8.1 The Local Plan evidence base clearly identifies that the Rutland Industrial Market is constrained, currently operating with an extremely low vacancy rate. The evidence base sets out a broad range of potential employment land requirement over the Plan Period and identifies that allocating the higher end of employment requirements may encourage employment growth. However, the evidence does not take account of how the existing low vacancy rate might be addressed. The Local Plan pursues the mid-point of employment need of 26.6ha industrial floorspace; however, the absence of consideration of existing lack of provision and failing to allocate towards the higher end of the employment land needs is likely to further constrain economic growth in Rutland.
- 8.2 As such, the economic policies of the Local Plan do not adequately reflect the overall employment need for Rutland over the Plan Period and do not provide adequate flexibility to allow existing and new businesses, particularly SMEs, to grow.
- 8.3 Consequently, it is not considered that the Sites allocated by Policy E1 provide sufficient space to provide for the required employment needs. The amount of allocated employment floorspace at Ketton and overall, within Rutland as a whole has been reduced since the Regulation 18 consultation. This is despite previous Representations setting out our Client's specific employment needs.
- 8.4 The Sites which are allocated are either identified for specific needs of existing businesses or are dependent upon the delivery of new settlements. They are therefore either not immediately available or will not be available to the general employment market. Further allocations are therefore required in general and specifically in Ketton to address local employment needs.
- 8.5 Policy E1 is therefore not 'Positively Prepared', 'Justified', 'Effective' or 'Consistent with National Policy' and it is therefore not 'Sound'.
- 8.6 Policy E2 is supportive of the provision of new employment development within the Planned Limits to Development. There is an inference in Policy SS8 that new non-residential development adjacent to the Planned Limits to Development is also acceptable. In light of the Representations made in relation to the Economic strategy in principle and the evidence provided in relation to Policy E1, flexibility should be included in Policy E1 to allow new employment development adjacent to the Planned Limits to Development, this would create a significant opportunity to deliver additional employment land in sustainable locations.

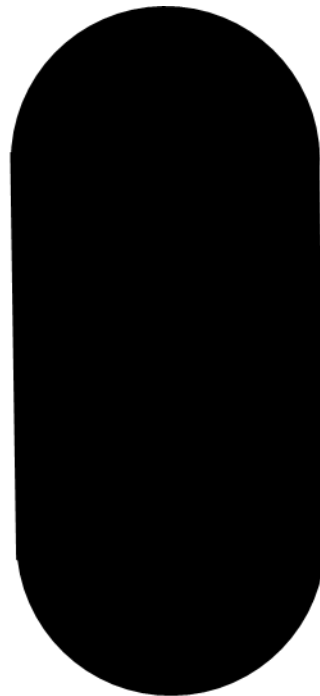
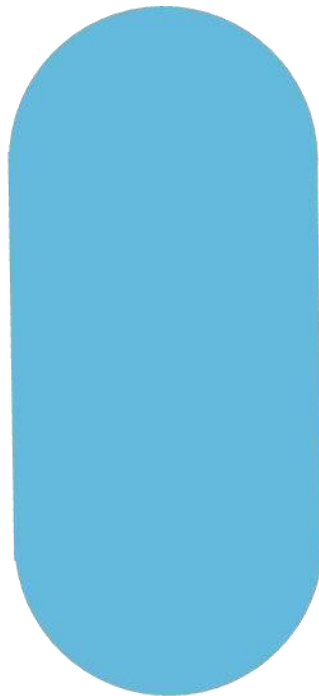
- 8.7 Policies SS9 and E4, which both related to the rural economy and non-residential development in the countryside, go beyond the requirements set out in the NPPF. They place significant restriction on new employment development outside of the defined limits of development. The Policies are not supportive of new build employment development and place additional restrictions on circumstances when new employment development would be acceptable in conflict with NPPF para 89. These Policies do not reflect the ongoing issues with employment land supply and demand and are therefore likely to further constrain employment land provision. The Policies are therefore not 'Positively Prepared' or 'Consistent with National Policy' and are not 'Sound'.
- 8.8 Best Little Building Co. Ltd are an established local business seeking to create a new headquarters and deliver other employment/office floorspace to meet their own immediate needs to allow them stay and maintain their presence in Ketton in the long term. Their Site at Steadfold Lane was considered 'broadly suitable' by the Employment Needs Evidence.
- 8.9 The Housing and Employment Site Assessment Report (July 2024) assessed the suitability of the Site for development. The Site passed Stage 1 and the conclusions at Stage 2a) were that 'there would be no significant constraints to development and may be suitable for employment use if no other more suitable site is available'.
- 8.10 The assessment undertaken at Stage 2b) identified a number of 'significant' technical constraints. These Representations and supporting promotion document illustrate that these technical constraints can be overcome. The Site is sequentially the same as the Site in Pit Lane and therefore should be considered acceptable in principle as an allocation.
- 8.11 The Site at Steadfold Lane should be allocated in addition to the Site at Pit Lane due to the significant employment needs both locally and across the County. The consideration of whether there are more suitable sites which should be allocated in preference is therefore not relevant to the allocation of the Steadfold Lane Site.

APPENDIX 1- ECONOMIC STATEMENT PRODUCED BY MARRONS



Best Little Building Co. Ltd

ECONOMIC STATEMENT





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1. INTRODUCTION

- 1.1 This Economic Statement has been prepared on behalf of Best Little Building Co. Ltd in support of its site at Land West of Steadfold Lane, Ketton, Rutland, who are the intended occupier of the site. The site is approximately 1.7ha in size.
- 1.2 The purpose of this Economic Statement is to summarise the business operations of the Best Little Building Co., its operating requirement for additional floorspace, and how this will be utilised. We set this in the context of the Council's employment needs evidence and related policy in the Draft Local Plan (Regulation 19).
- 1.3 The Economic Statement is structured as follows:
- in Section 2 we summarise National Planning Policy in respect of its support for development supporting economic growth particularly in the rural economy, and the need for flexibility;
 - in Section 3 we summarise both the existing business operation, and operational requirements;
 - in Section 4 we review the Council's employment land needs evidence;



2. NATIONAL PLANNING POLICY CONTEXT

National Planning Policy Framework (2023)

- 2.1 The National Planning Policy Framework (NPPF) is a material planning consideration and since its inception has set out the importance of economic development in the planning system and to decision-making.
- 2.2 Indeed, the NPPF identifies the purpose of the planning system is to contribute to the achievement of sustainable development. This requires the delivery of the three overarching objectives identified in paragraph 8, the economic, social and environmental objectives.
- 2.3 The economic objective within this paragraph seeks *“to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.”*
- 2.4 Section 6 of the NPPF Building a strong, competitive economy confirm that planning policies and decision help create the conditions in which businesses can invest, expand and adapt. Paragraph 85 also confirms that significant weight should be placed on the need to support economic growth and productivity. It goes on to set out that the approach taken by the local authority should allow each area to build on its strengths, counter any weaknesses and addresses the challenges of the future. Planning policies should also be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and enable rapid response to changes in economic circumstances¹
- 2.5 Paragraph 88 of the NPPF refers specifically to the rural economy, confirming that planning decisions should enable a range of businesses, including *‘the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings’*.
- 2.6 Paragraph 89 goes on to confirm that planning policies and decision should recognise that sites to meet local business and community needs in rural areas may have to be

¹ Paragraph 86 d) NPPF



found adjacent to or beyond existing settlements, and in locations that are not well served by public transport or beyond existing settlements.

- 2.7 As such, the NPPF demonstrates support for the expansion of Best Little Building Co. Ltd's business operations in Ketton, and at the proposed site.



3. EXISTING BUSINESS OPERATIONS

Best Little Building Co. Ltd

- 3.1 Founded in 2014 by Jamie Ward, Best Little Building Ltd is young and ambitious local building contractor which has grown from a sole trade business. The business focuses on high quality construction projects both domestic and commercial in the Rutland Area, with a bias towards the west of Ketton (along the A1).
- 3.2 The business has strong ties to Ketton, employing a number of local staff, and with a strong brand affinity to Ketton.

The Necessity of Expansion

- 3.3 The company has outgrown its existing headquarters building, where the office space is not only limiting the company's ability to hire new talent to achieve its target growth, but also struggling to provide a safe working environment for the existing staff. The company currently has 12 staff members, and the current office space is limited to 10 people. The company also employs in excess of 50 tradesmen who are site based.
- 3.4 Due to the lack of vacant employment land for the local business to relocate to, it becomes imperative to develop an appropriate site for Best Little Building Co.
- 3.5 At present the business is operating out of 2,000 sq ft of floorspace at Unit 14, Chater Business Estate, Pit Lane, Ketton, PE9 3SZ, with a further unit nearby providing an additional 1,000 sq ft of office space. We set out the current deficiencies with the current premises below.

Current Office Deficiencies

- Internal storage – the premises has 1,000 sq ft but requires 10,000 – 12,000 sq ft.
- No storage space for plant and machinery – which instead are presently moved from site to site, exposing assets to theft and damage, and serving as a constraint on growth.



- No space available to undertake bespoke joinery, integral to delivery of projects and significant constraint on business growth
- Insufficient parking provision
- Lack of space for clients to visit/ host project meetings
- No external storage space, required for plant and materials

3.6 There is a strong business requirement for additional floorspace, but in order to staff, the businesses existing local base and loyalty, as well as minimise disruption there is a need for that additional floorspace to be located in/ close proximity to Ketton. Sites which may be available in Uppingham or Oakham are too distant from the customer catchment area of the existing business (biased towards the West of Rutland/ A1).



REVIEW OF COUNCIL ECONOMIC NEED EVIDENCE

Rutland Employment Land Review (ELR), August 2023

- 4.1 In its commercial market review the ELR reports on current industrial vacancy rates, which it confirms to stand at 0.42% (April 2023) – significantly lower than required for a properly functioning market. Based upon this evidence the Rutland industrial market is significantly constrained, with no opportunity for local business growth/ expansion. As the Study points out in paragraph 3.23 the market is extremely under supplied. This view is also supported by low net absorption levels (take up) experienced in recent years, demonstrating the constraint which has been placed on the local market.
- 4.2 In respect of Agent feedback, paragraph 3.36 confirms that there is demand for industrial floorspace across the whole of Rutland, however Oakham, Ketton and units within close proximity to the A1/M1 face great demand. Whilst paragraph 3.35 sets out the Agents view that in Rutland smaller units of 1,000-2,000 sq ft are most in demand, and there is little evidence of upsizing, that should not be seen as or evidence the need to constrain the availability of larger units for businesses should they wish to upsize, such is the case with Best Little Building Co.
- 4.3 Evidence presented in the ELR demonstrates that the construction sector has grown by 200 jobs over the past 20 years, with a similar level of growth forecast over the 20 years to 2041.
- 4.4 In establishing the need for industrial sites within Rutland, the ELR focuses on a range of between 18.2ha and 34.9ha, the former based upon net absorption and the latter net completions. The ELR acknowledges that net absorption figures should be treated with caution (paragraph 5.52). Extremely low vacancy rates indicates that take up (net absorption) has been suppressed. It also notes that the absorption data will not capture all transactions – as such it cannot be relied upon as a meaningful measure of past demand, let alone future need.
- 4.5 However, the ELR considers that the range is appropriate and that a need of 18.2ha should be treated as the absolute minimum, but that preferably the mid point of 26.6ha be used. It does go on to say that it would not be unreasonable to look above 26.6ha to help facilitate growth, and even up to 34.9ha. Paragraph 5.55 also goes on to state,



subject to infrastructure improvements, that further demand (beyond that stated above) could result.

- 4.6 On the face of the evidence presented within the ELR, and the significantly low vacancy rate experienced within Rutland it is considered that the lower net absorption based figure should be discarded. Whilst the higher figure of 34.9ha is considered more reasonable, this takes no account of the constraints which have been placed on supply in the past (indicated by the extremely low vacancy rate), and no allowance appears to be made to address the low vacancy rate/ poor availability of supply within the existing industrial market. Addressing both of these issues would require a need in excess of 34ha.
- 4.7 In respect of our client's site, the ELR appears to review it, however incorrectly refers to it as a site of 0.4ha. Notwithstanding, we note that the ELR considered the site to be broadly suitable as an extension to sites to the south. It is unclear the extent to which the incorrect reported size influenced the site being discounted, but in employment supply terms the site should be considered equally to the others preferred sites within Ketton, and is a site which can be brought forward for immediate occupation by a local business in keeping with the requirements of the NPPF.

Rutland Local Plan – Regulation 19 Consultation

- 4.8 Strategic Policy E1 of the draft plan seeks to allocate six sites for employment use. Whilst we note this includes land at Pit Land Ketton, this site is only 0.9ha, and as such too small for our client's needs (our client's site totaling c.1.7ha). Other sites listed are simply too large, and in the wrong location – too far the businesses predominant customer base and projects. The draft Local Plan does not allocate any further sites within Ketton, despite the ELR recognising the demand which exists within Ketton for industrial floorspace.
- 4.9 Collectively, the sites presented in draft Policy E1 total 26.4ha. The Council rationalise this by referencing the ELR's conclusions around the mid point of need totaling 26.6ha, however for the reasons identified above there is a requirement to plan for need at the upper end of the assessed range (34.9ha), if not higher.
- 4.10 However it is also important to note that many of those sites identified in Policy E1 are not available for immediate delivery (being reliant on the delivery of new settlements – Luffenham and Woolfox); have a named occupier - Burley Appliance for example; whilst



the Uppingham Gate site is identified in the Neighbourhood Plan for a mix of uses including residential, foodstore, older persons accommodation, entertainment, leisure and recreation facilities and employment uses.

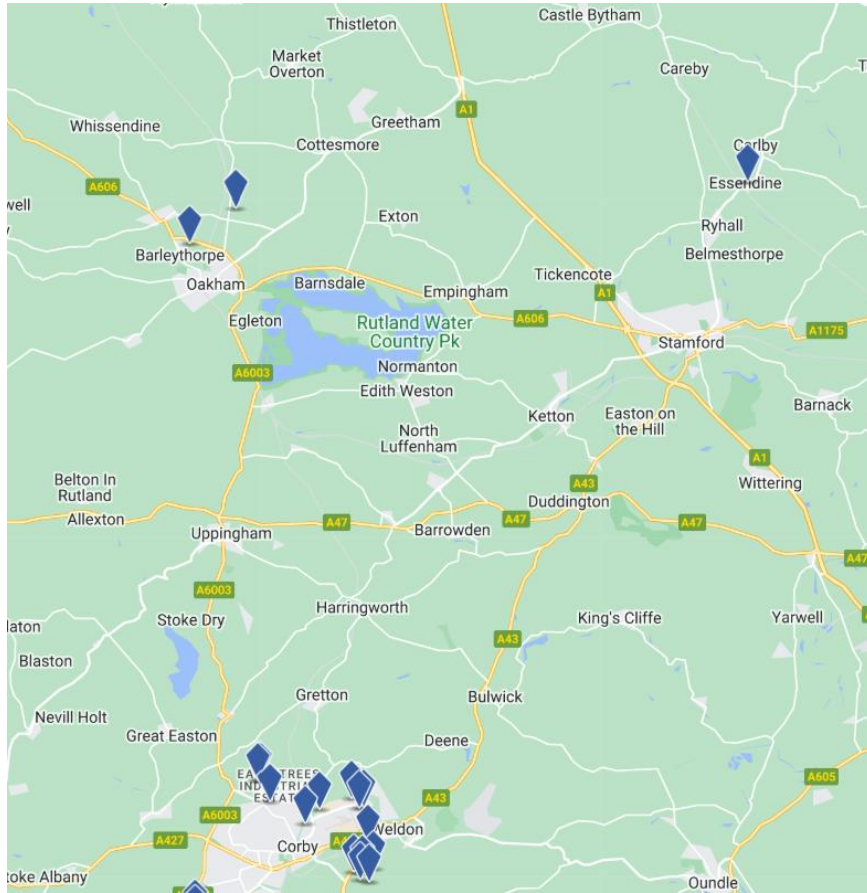
- 4.11 There are no clear options for our client within the draft allocations, and none within Ketton.
- 4.12 In respect of our clients business requirements, there is also an argument that this falls outside of the assumptions underpinning the forecast need – our client has a specific requirement to expand their business within Ketton, the need for which is not reflected in past completion trends.
- 4.13 Furthermore, in respect of the Council’s monitoring framework identified towards the end of the draft plan, page 283 confirms that the Council will be monitored in delivering at least 16ha against Policy E1. This is inconsistent with the levels of need identified, and an overarching objective of meeting at least the full identified need should be included.

CoStar Commercial Property Data

- 4.14 As an update to the ELR we have utilised the latest data from CoStar to establish the extent of available industrial and light industrial properties within Rutland (>15,000 sq ft). As can be seen on the map below, none are located near to our client’s existing business operations.



Figure 1: Current availability of light/ industrial premises >15,000 sq ft



Source: CoStar. Current availability of industrial/ light industrial units to lease >15,000 sq ft.



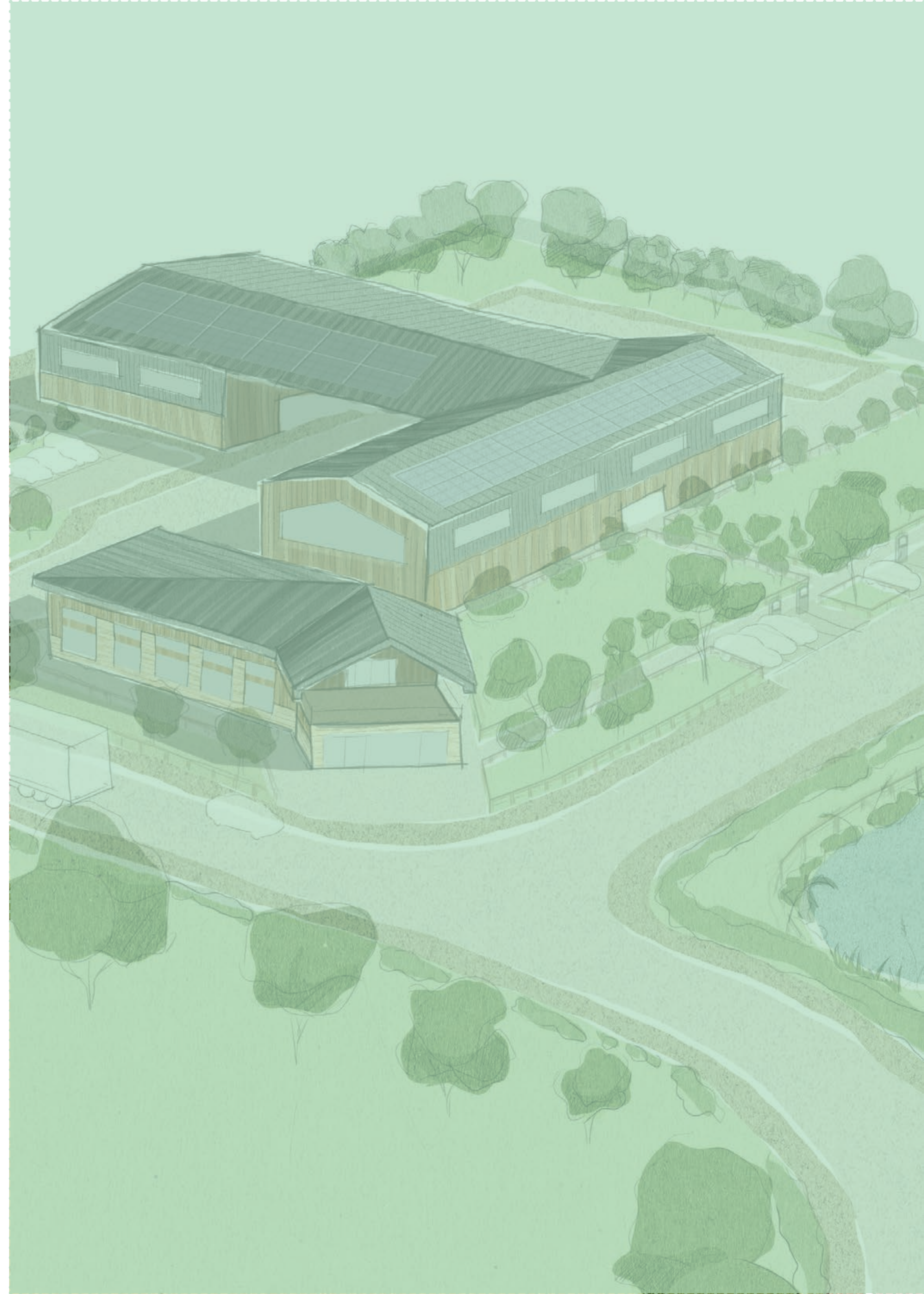
5 SUMMARY

- 5.1 This Economic Statement has been prepared on behalf of Best Little Building Co. Ltd in support of its site at Land West of Steadfold Lane, Ketton, Rutland, who are the intended occupier of the site. The site is approximately 1.7ha in size.
- 5.2 The purpose of this Economic Statement is to summarise the business operations of the Best Little Building Co., its operating requirement for additional floorspace, and how this will be utilised. We set this in the context of the Council's employment needs evidence and related policy in the Draft Local Plan (Regulation 19).
- 5.3 At the outset Government planning policy is clear in its support for the rural economy, and requiring that planning decisions enable the expansion of all types of business in rural areas. The NPPF also requires that planning decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport or beyond existing settlements.
- 5.4 The Council has prepared employment land need evidence which supports the need for between 18.2ha and 26.6ha. However, it is clear that the ELR raises doubts over the reliability of the calculation informing the lower end of this forecast, and therefore whilst it suggests use of the mid-point, 26.6ha, it acknowledges that it would not be unreasonable to look above that figure to 34.9ha or beyond. Indeed, it is clear that the Rutland industrial market is constrained, and currently operating with an extremely low vacancy rate – the assessment of need takes no account of how this low vacancy rate may be addressed. As such industrial need is considered to be greater than reported in the ELR, and pursuing only the mid-point of 26.6ha is likely to further constrain economic growth in Rutland.
- 5.5 The Council's Draft Local Plan seeks to adopt the mid-point (noting that it appears to set a lower threshold in its monitoring targets), and seeks to allocate a total of six employment sites totalling 26.2ha. Of those sites identified none are suited to our client's need due to either location, size, immediacy of delivery or availability in the open market.



- 5.6 Our client's business is based in Ketton, with which it has strong ties, employs a local labour force, and a local client base. It has an urgent need for new premises within Ketton to consolidate its business requirements in one site, and help facilitate growth.
- 5.7 Whilst the proposed site was considered in the ELR, the ELR incorrectly reported the site's size, as such it is not clear whether it was properly assessed, The proposed site presents an opportunity to help meet economic growth objectives within Rutland, whilst meeting the immediate needs of a growing local business within Ketton in support of the requirements of the NPPF.

APPENDIX 2- SITE PROMOTION DOCUMENT PRODUCED BY 24/THREE

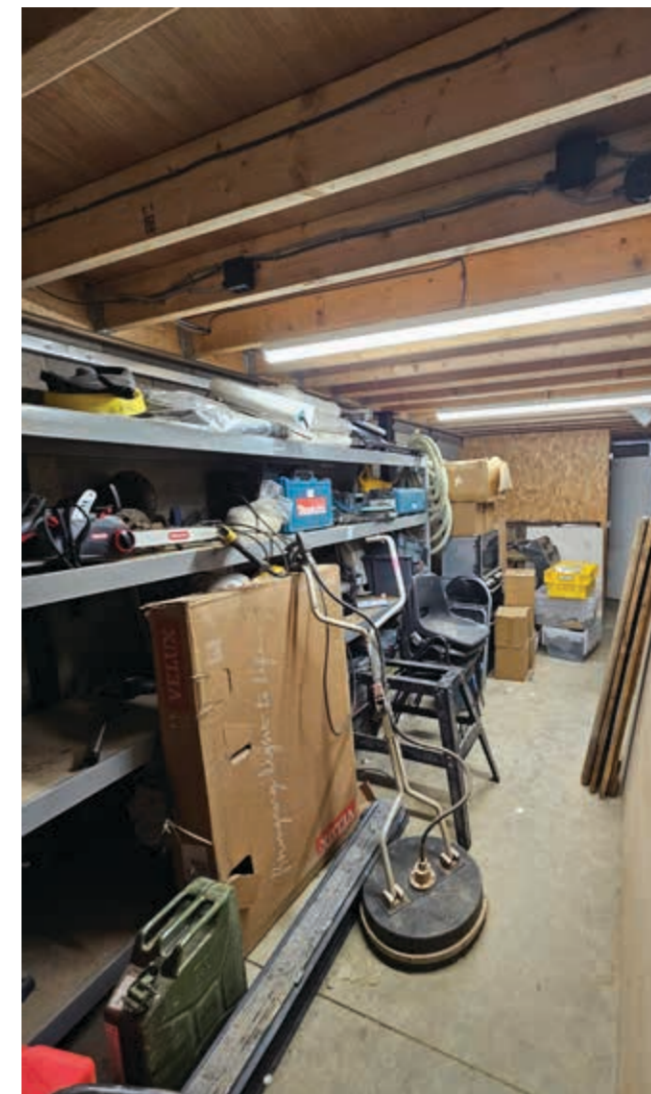
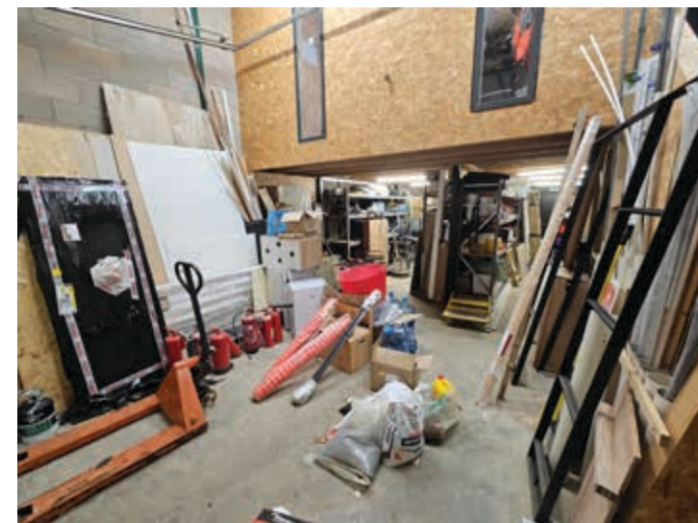


LAND OFF STEADFOLD LANE

Site Promotion Document
02-12-2024



Current Office - Aerial View



Best Little Building - Current Office Conditions

BEST LITTLE BUILDING INTRODUCTION

Founded in 2014 by Jamie Ward, Best Little Building Ltd is **young and ambitious local building contractor** which has grown from a sole trade business. The business focuses on high quality construction projects both domestic and commercial in the Rutland Area.

THE NECESSITY OF EXPANSION

The company has outgrown its existing headquarters building, where the office space is not only limiting the company's ability to hire new talent to achieve its target growth, but also struggling to provide a safe working environment for the existing staff. The company currently has 7 staff members, and the current office space is limited to 6 people. Due to the lack of vacant employment land for the local business to relocate to, it becomes imperative to develop an appropriate site for Best Little Building Co.

CURRENT OFFICE DEFICIENCIES

- **Internal storage** - the premises has 1,000sqft and 10,000- 12,000 sqft is needed
- **No storage space** for plant and machinery which instead has to be moved from site to site, **exposing assets to theft and damage**
- **No space** available to undertake bespoke joinery which is integral to delivery of projects
- **Insufficient parking provision**
- **Lack of space** for clients to visit and have meetings
- **No external storage space** which is required for plant and materials



JAMIE WARD
Founder & Director



  Site Boundary

Steadfold Lane - Site Aerial

SITE LOCATION

The business has **strong roots to the local area** and would like to remain based in its rural location, Ketton has good links to main roads (A1, A43 and A47), which is integral to logistically servicing its job sites. The site sits to the north-east of Ketton village and is currently used as arable/ agricultural land.

The site's immediate context is primarily industrial/ commercial (Hanson Cement works to the west) and agricultural land with a small portion of newer residential dwellings to the south. The site sits in a rural setting and is well screened from its surroundings from existing trees and foliage along its boundaries.



1. View up Steadfold Lane (looking North)



3. View looking down Steadfold Ln



4. Steadfold Ln (looking South)



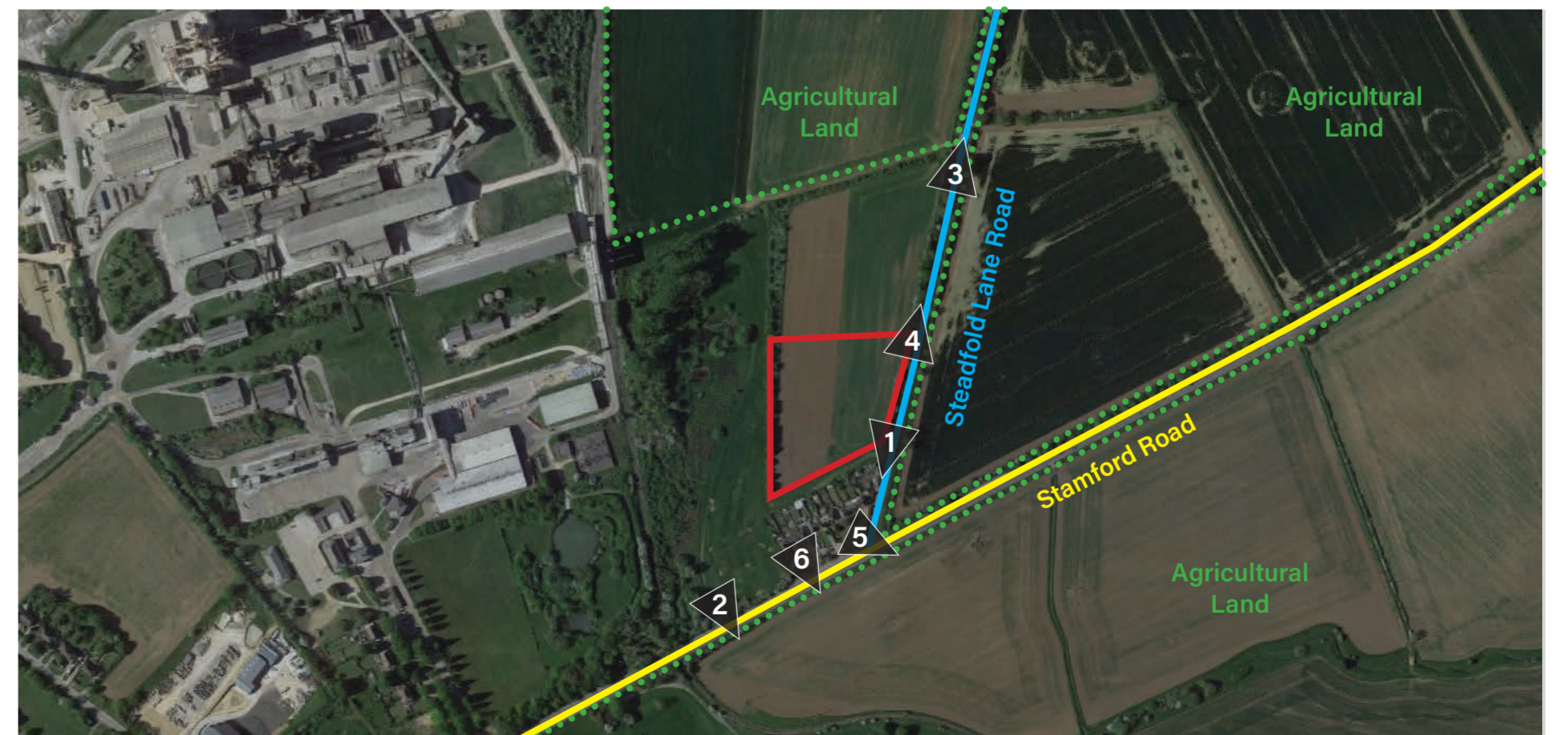
2. View into site from Stamford Road (looking West)



5. Stamford Rd



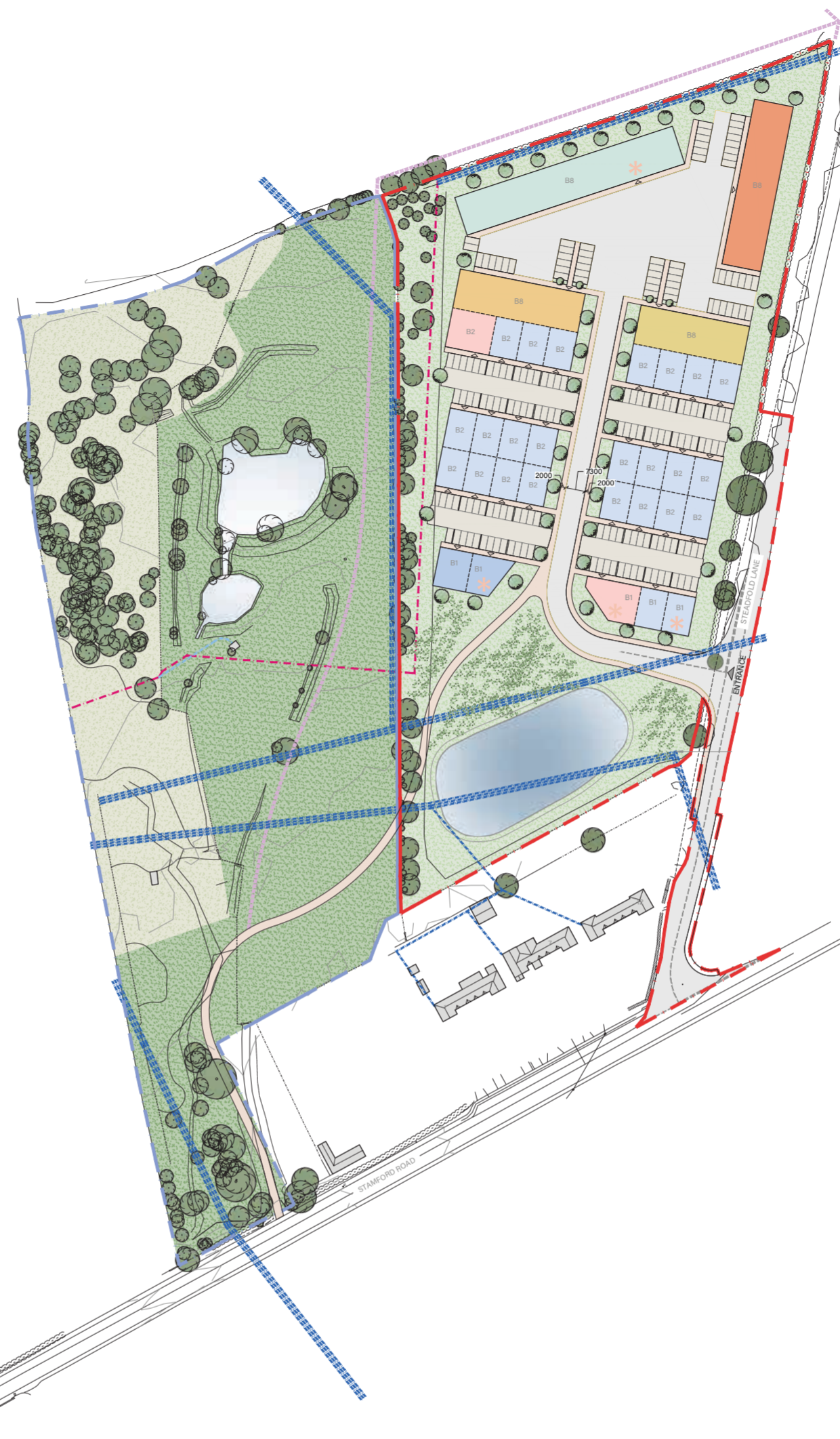
6. Stamford Road Residential



Detailed Aerial View



































Existing Site - Opportunities and Constraints plan



Proposed Plan

KEY

Site Boundary 3.8 Hectares Approx	
Land in Client Ownership	
Existing Buildings	
Site Levels	
Existing Foliage	
Arable Land	
Existing Green Space	
Woodland Priority Habitat	
Existing Track	
Existing Ponds	
Overhead Cables	
High Voltage Underground Cable	
Low Voltage Underground Cable	
Potential Vehicular Entrance	
Potential Development Area	
Potential Pedestrian Access	
Sensitive Response Required to Existing Property Boundaries	
Potential Attenuation Zone	
1500sqft Units	
1830sqft Units	
2500sqft Units	
6300sqft Units	
7250sqft Units	
9500sqft Units	
12900sqft Units	
Focal Building	
Proposed Road	
Proposed Pavements	
Proposed Parking Areas	
Proposed Green Space	
Proposed Ecological Feature	
Proposed Trees	



INITIAL PRE-APPLICATION

17th May 2023

The proposal was aiming to develop the arable land at land west of Steadfold Lane to provide commercial use in the form of use class B1, B2 and B8 and associated works.

The smaller B1 units were proposed to the south as they generate a lower level of activity and noise and are more compatible with residential. It also provided the opportunity of active frontages fronting the open space to the south and most visible portion of the site. B2 use classes were placed above with the largest B8 use classes and distribution area to the north of the site. Each unit had designated parking areas in close proximity to the main entrances.

CONNECTIVITY & MATERIAL

The proposal made use of the existing **vehicular entrance off Steadfold Lane**, forming the main vehicular route that accommodated HGV's. The new access required local widening of Steadfold Lane, slightly moving the speed limit change as well as provision of a 2m footpath connecting to Stamford Road.

The B1 units fronting this area were planned to be the most prominent and visible focal buildings with high quality landscaping to soften the building's impact from the road. An **ecological feature** such as a wildflower meadow was considered. The composition of the area provided a strong sense of arrival to the site, and a **distinct character**. The materials choice was also a reflection of the surrounding area; **local stone, slate roof tiles and cladding**.

RESPONSE TO THE PRE-APPLICATION

9th November 2023

Creating access from Steadfold Lane would require the road to be upgraded from the north and the south of the proposed access. Therefore, providing access from Stamford Road is more adequate. The proposal will be located in the southernmost part of the site to provide offices for the Best Little Co. Ltd to accommodate and expand their existing local workforce. The proposed buildings would be architecturally **bespoke, beautiful, and sustainably designed**.



Existing Site - Opportunities and Constraints plan



Proposed Plan

KEY	
Site Boundary	[Red dashed line]
Land in Client Ownership	[Blue dashed line]
Existing Buildings	[Grey solid area]
Site Levels	[White solid area]
Existing Foliage	[Dark green solid area]
Arable Land	[Light green solid area]
Existing Green Space	[Medium green solid area]
Woodland Priority Habitat	[Light green with dots solid area]
Existing Track	[Purple dashed line]
Existing Ponds	[Blue solid area]
Overhead Cables	[Blue dashed line]
High Voltage Underground Cable	[Red dashed line]
Low Voltage Underground Cable	[Blue dashed line]
Potential Vehicular Entrance	[Red dashed line]
Potential Development Area	[Light brown solid area]
Potential Pedestrian Access	[Black dashed line]
Sensitive Response Required to Existing Property Boundaries	[Green dashed line]
Potential Attenuation Zone	[Blue solid area]
Focal Building	[Star symbol]
Proposed Road	[Grey solid area]
Proposed Pavements	[Light brown solid area]
Proposed Parking Areas	[Light grey solid area]
Proposed Green Space	[Medium green solid area]
Proposed Ecological Feature	[Light green solid area]
Proposed Trees	[Tree symbol]
Office Space - 6,000sqft	[Light blue solid area]
Workshop Space - 6,000sqft	[Yellow solid area]
Storage Space - 5,000sqft	[Orange solid area]



REVISED PRE-APPLICATION

The new proposal includes an office area, a workshop space, and internal storage for Best Little Building Co Ltd.

The emphasis is on rectifying the shortcomings of the current office by furnishing the essential space and facilities required for the business to flourish within its local surroundings. Access for pedestrians and vehicles is facilitated via Stamford Road, leading to improved visibility, pedestrian connections, proximity to bus stops, and suitable entry points for Heavy Goods Vehicles (HGVs) and visitors. Furthermore, landscaping efforts have been implemented to mitigate the building's visual impact from the road, including the incorporation of ecological features such as a wildflower meadow.

GROSS EXTERNAL AREAS

- 6,000sqft Office space
- 5,000sqft Storage space
- 6,000sqft Workshop space
- Parking: 50 cars
- Loading: 2 lorries



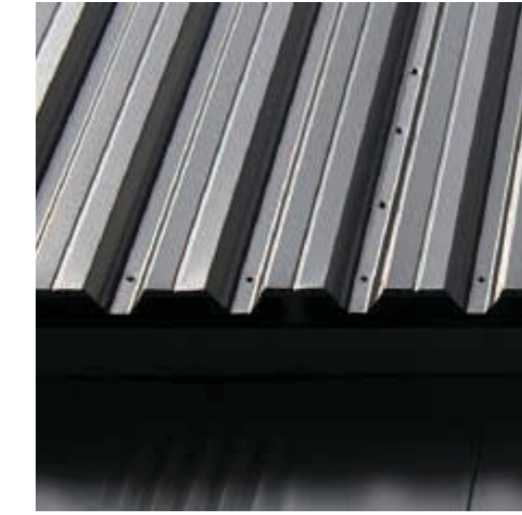
Precedents, Country Gardens Studios, Ashworth Parkes



Precedents, Tillingham Winery, RX Architects



Timber Cladding



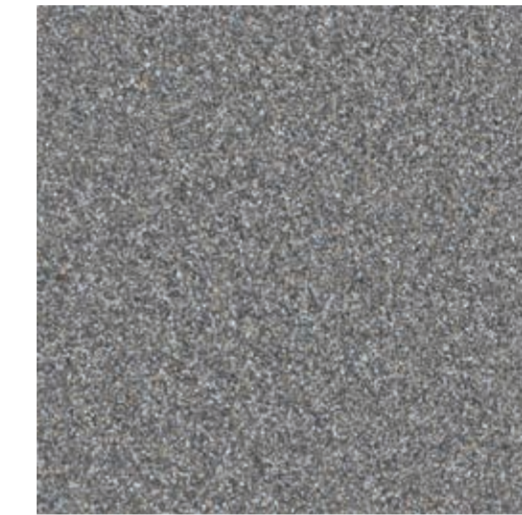
Metal Roof



Solar Panels



Stone



Gravel



Air Source Heat Pump



Resin Paving



Tarmac



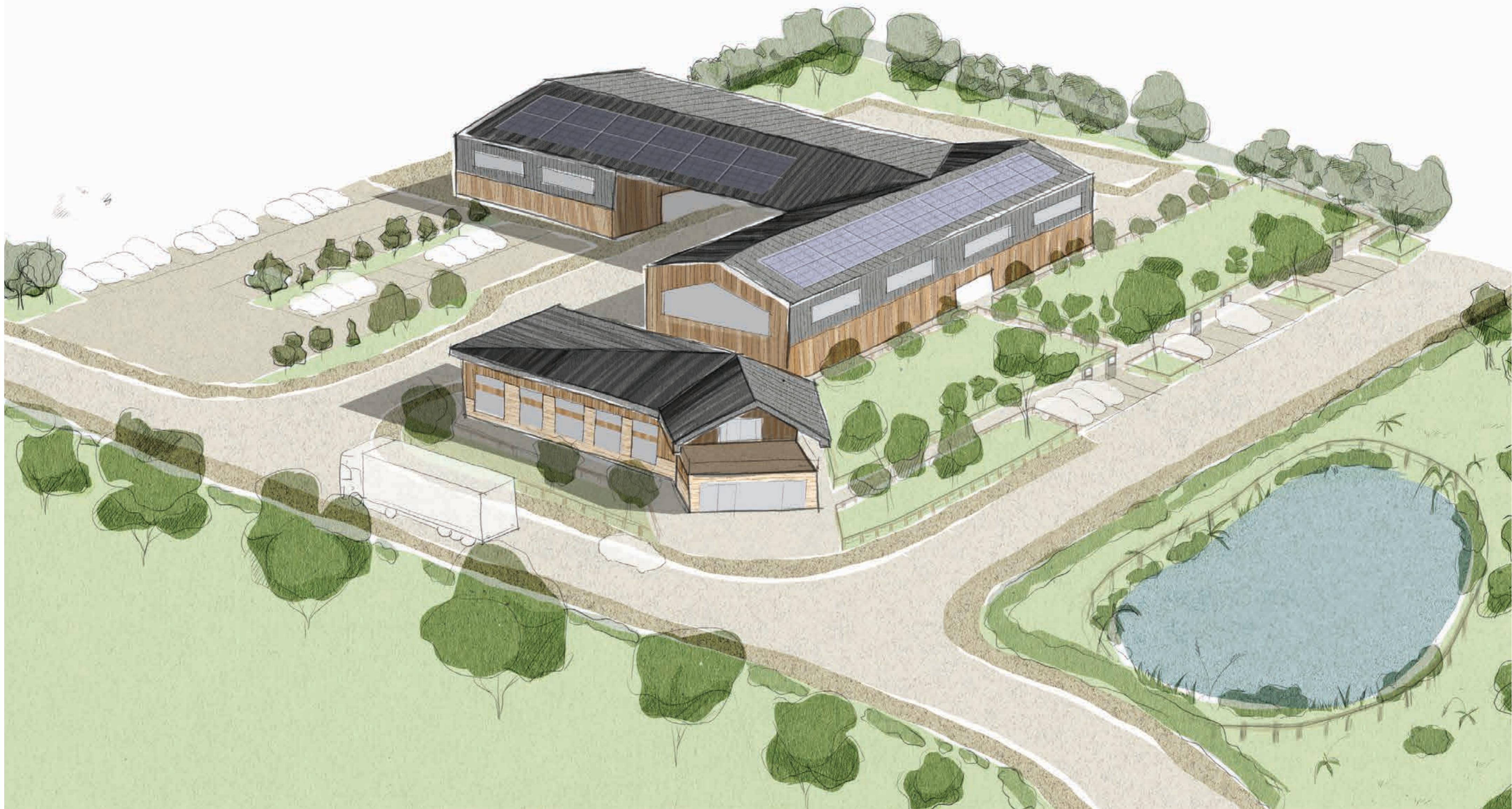
EV Charging

PRECEDENTS, MATERIALS & SUSTAINABILITY

The material palette for the development was chosen to enhance the existing context.

- Roof - Trapezoidal metal sheet roofing
- Walls - Timber cladding and stone plinth
- Glazing - Architectural glazing
- Parking - Gravel
- Haul Road - Tarmac to workshop and store buildings
- Kerbs - Concrete
- Pathways - Resin

Additionally, renewable resources were considered where appropriate. Solar Panels are added in the scheme as a renewable, inexhaustible, and affordable form of energy. Air source heat pumps provide clean, efficient, and energy saving heating and cooling throughout the year. Finally, EV charging stations can promote sustainability by reducing carbon footprint, decreasing energy costs, and promoting the use of electric vehicles.



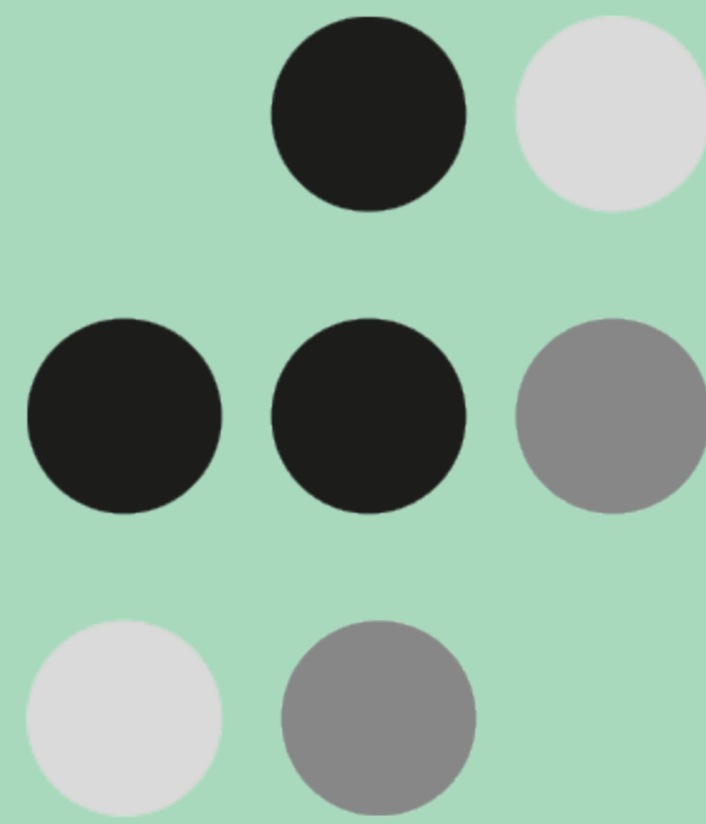
Proposed Aerial View

Client: Best Little Buildings Co Ltd
rev. -
Date: 14/03/24
Drawn: KP
Status: Preliminary



Proposed Eye-Level View

Client: Best Little Buildings Co Ltd
rev. -
Date: 14/03/24
Drawn: KP
Status: Preliminary



24/Three