localplan@rutland.gov.uk

Direct Dial: 07769 242872

 Our ref: PL00794464 Date: 26th November 2024

Dear Mr Ranson

**Rutland Regulation 19 Local Plan consultation**

Thank you for consulting Historic England regarding the Rutland Local Plan consultation.

General Comments

Only new sites have been considered in our advice at this stage, this is due to the large number of sites brought forwards for consultation. We may still comment or object at a later stage to any proposals that come forward as part of the Local Plan.

As with all proposed sites, please ensure that your Conservation Officer and Archaeological Advisor have been consulted. There may be archaeological, built heritage or historic landscape issues that your own heritage advisors will be able to identify that were not evident from our records and knowledge.

Where we have not commented on site allocations which have current planning approval or has been previously allocated, Historic England may still comment or object during any future consultation where circumstances change, permissions expire, or new information comes to light.

**Local authority archaeological and conservation expertise should be applied to all heritage assets affected by proposed site allocations under consideration.**

**Detailed Comments**

Our detailed comments on the proposed Policies are set out in Appendix A and on Allocations within Appendix B.

Please also refer to our previous comments.

**Evidence Base**

**The evidence base is critical to the preparation of a Local Plan in accordance with the NPPF. Historic England object to the lack of proportionate assessment provided, contrary to paragraph 35 of NPPF.** We have concerns regarding the lack of heritage assessment presented within the evidence base. Much of this missing information may already be available. Information of relevance could include (but is not limited to) the following: -

• Updating conservation area appraisals

• Heritage Impact Assessment for site allocations (please see Appendix B)

• Undertaking characterisation studies

• Producing setting studies – of specific settlements or heritage assets

• Local lists

• Assessments of landscape sensitivity

The following published advice is of relevance: -

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Closing comments

This opinion is based on the information in the document you provided. The content of this letter does not limit our obligation to advise you on, and potentially object to, any specific development proposal arising from this or later versions of the plan. We hope that the above comments are of assistance. Please do not hesitate to contact me to discuss, we would be very happy to arrange a meeting.

Yours sincerely

Emilie Carr

Emilie Carr

Historic Environment Planning Adviser

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**Appendix A: Table of Historic England’s comments on the Pre-Submission Draft of the Rutland Regulation 19 Local Plan**

[Historic England’s comments on the proposed Allocations are set out in Appendix B]

| **Section / policy** | **Sound/****Unsound** | **Comments** | **Suggested Change** |
| --- | --- | --- | --- |
| SS4 | Unsound | A heritage impact assessment should be included (this may well be available though it should be recent, if available and can be added to the evidence base). Please see our previous comments and meeting notes regarding St Georges Barracks (former RAF North Luffenham). Concern is raised regarding the latest iteration of the draft policy, in particular as the layout of the site is not referenced sufficiently. Much of the significance relates to the layout of the camp itself, the avenues, grid plan, the arrangement of buildings and open spaces. This was very carefully thought out under the guidance of the Royal Fine Arts Commission. Lutyens himself led on engagement with the Air Ministry, and helped to improve the overall design of RAF stations. This resulted in permanent RAF stations being built with a ‘campus’ like character, which provided a good work and living environment for personnel. Individual buildings were designed by other notable architects, often in a neo-Georgian style. St Georges displays all these key characteristics and this character should be respected in redevelopment proposals. As such, further wording is required within criteria to reflect this. The key consideration at Woolfox is the meaningful preservation and conservation of the wartime Watch Office (control tower) and Cold War Bloodhound Missile buildings and hard standings. Both are unlisted, but important non-designated heritage assets which retain considerable symbolic/communal/public interest value and evidential value. The Bloodhound Missile installation sat in a fenced compound and the maintenance of this space to frame the assets is essential to their conservation.Woolfox was first built as a temporary wartime station, on different principles to stations such as RAF North Luffenham. Here the primary concern was speed of construction and dispersal of aircraft, accommodation and technical buildings to mitigate the effects of bombing. However, Woolfox Lodge, like North Luffenham, went on to have an important Cold War role.Again, detailed assessment is required both at Local Plan and application stage. Assessment should pay particular attention to of associated junction infrastructure such as bridges or lighting and its impact on Exton Park RPAG. There should be a clear distinction / separation between new development and Clipham and Stretton.  | St GeorgesThe wording *“and retaining the historic campus-like character of the pre-War RAF station design”**Be added to the end of criteria 17.*WoolfoxAdditional criteria is required to reflect the significance of Woolfox, both for the assessment required and for detailed criteria relating to the site (beyond that within criteria 7). Historic England would be very happy to assist with wording |
| H2 Stamford North | Unsound | Please also see our comments in appendix 2. Whilst criteria k) is acknowledged, an appropriate buffer for the Roman Town scheduled monument at Great Casterton should be included within the site allocation map (as previously agreed during the draft SPD and subsequent planning application negotiations for the site). Criteria k is not a substitute for an appropriate mapped buffer in this instance. Please see all previous correspondence and meeting notes.What will be done to secure the conservation and appreciation of the stretch of Ermine Roman Road to the south (such as improved management, vegetation clearance, interpretation etc)? This needs to be brought into: <https://rutland.oc2.uk/document/38/3001#d3001>Further assessment is required, including upon the landscape, views into and out of the site in relation to Burghley House GII\* RPG. | Criteria k is not currently adequate to effectively and proportionately address the significance of the Roman Town scheduled monumentWe believe a drawn map of the buffer to the monument should be included with the policy as previously agreed. This will provide necessary assurance and clarity for all parties where reliance on wording only is likely to be ineffective, we suggest the policy refers to;-an appropriate buffer to conserve and better reveal the significance of the Roman Town Scheduled Monument at Great Casterton which is appended [ref]. Any refinement to that buffer would need to be justified in a detailed Heritage Impact Assessment following the methodology set out in Historic England’s GPA 3 ‘Setting of Heritage Assets’. |
| CC8 |  | Whilst the paragraph “*The broad area suitable for Large Scale Wind Energy Turbines classification does not prejudice other material planning considerations, such as effects on designated sites and their interest features”* is welcomed – the drawing should be clearly and legibly marked to indicate that heritage impacts were not assessed in the mapping exercise The separations on the map for areas potentially suitable for’ - small / medium, medium / large and very large wind turbines together with opportunity areas for solar create inherent difficulties once actual schemes are being designed particularly on their boundaries, your authority may find it difficult to defend these demarcations. | *Mark drawings ‘Heritage impacts were not assessed in the creation of this map and must be assessed on a case by case in line with relevant statute, national and local planning policy and guidance.’* |
| Heritage policy EN12 |  | Whilst Heritage policy EN12 is largely welcomed, there is an objection to the evidence base as detailed separately.  |  |
| Evidence base | Unsound | The Plan is unsound, contrary to paragraph 35 of the NPPF as it is not in line with national policy and the need to protect the significance of heritage assets and their setting, the policies/sites are not justified as there is no evidence to support their inclusion and the policies/sites will not be effective as there are no considered avoidance/ mitigation/ enhancement measures that could overcome harm to the historic environment.   | Include Heritage Impact Assessments of the proposed site allocations in the evidence base for the Local Plan.  |

**Appendix B: Table of Historic England’s comments on the proposed Allocations in the Pre-Submission Draft of the Rutland Regulation 19 draft Local Plan**

[Historic England’s comments on the remainder of the Local Plan are set out in Appendix A]

| **Site Ref.** | **Location** | **Sound/****Unsound** | **Comments** | **Suggested Change** |
| --- | --- | --- | --- | --- |
| H1.1 | Land south of Stamford Road |  | The policy criteria are welcomed. A heritage assessment is required both at Local Plan and application stage in relation to the nearby heritage assets, including the Conservation Area.  |  |
| H1.2 | Officers Mess, Edith Weston |  | A detailed heritage assessment is again required at both Local Plan and application stage. An additional criteria should be included for both a detailed HIA at application stage (together with that carried out at Local Plan stage) and for a criteria to ensure protection of the setting of the Grade II listed School House and other listed buildings. | A HIA and an additional criteria to read *“Ensure the design and layout respects the form and character of the village in this location and enhances the settlement edge and the wider 'setting' of the Conservation Area.”* |
| H1.3 | Whitwell Road, South Empingham |  | A detailed Heritage Assessment is again required both at Local Plan stage and application stage. Whilst criteria f) is welcomed an additional criteria should be included to protect the setting of the Conservation Area. | A HIA and an additional criteria to read “*Ensure the design and layout respects the form and character of the village in this location and enhances the settlement and the wider 'setting' of the Conservation Area.”* |
| H1.4 | Land south west of Belmesthorpe, Ryhall |  | An additional policy criteria is required to address the potential effects on the setting / character of the adjacent Conservation Area. Design / layout should also reflect the Conservation Area. An archaeological assessment is required. |  |
|  | Stamford North |  | Please see comments in relation to policy H2 in appendix A.  |  |
| E1.4 | Pit Lane, Ketton |  | Heritage assessment due to proximity to CA |  |
| E1.5  | Woolfox Depot, Great North Road |  | Please see our comments in relation to policy SS4 in appendix A. |  |
|  | Woolfox |  | Please see our comments in relation to policy SS4 in appendix A. |  |
|  | St Georges Barracks |  | Please see our comments in relation to SS4 in appendix A. |  |