



ANDREW BEARD
PLANNING

Local Plan
Rutland County Council
Catmose
Oakham
Rutland
LE15 6HP

Date: 5th January 2024
Ref: ABP/0516

Dear Sir / Madam

Draft Plan representations
Re: Places of Worship / community services

I am writing as agent on behalf of the Cavendish Gospel Hall Trust, who are part of the Plymouth Brethren Christian Church (PBCC) and have a significant congregation and community within Rutland and surrounding areas.

The context of this representation is under the topic of community services and churches, as Use Class F.1(f) [September 2020].

The support for community facilities and particularly places of worship is set out clearly in –

NPPF 2023 Paragraph 97 *“Plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;”*

The CGHT has an ever pressing need to deliver places of worship for its congregation and this requires a combination of a main City Hall (serving the whole area and linked to neighboring districts) and a range of smaller local halls for more daily small scale use.

The growth of the congregation, which operates at the lower end for the smaller halls with congregations of 35-50 people, creates a need for more new places of worship.

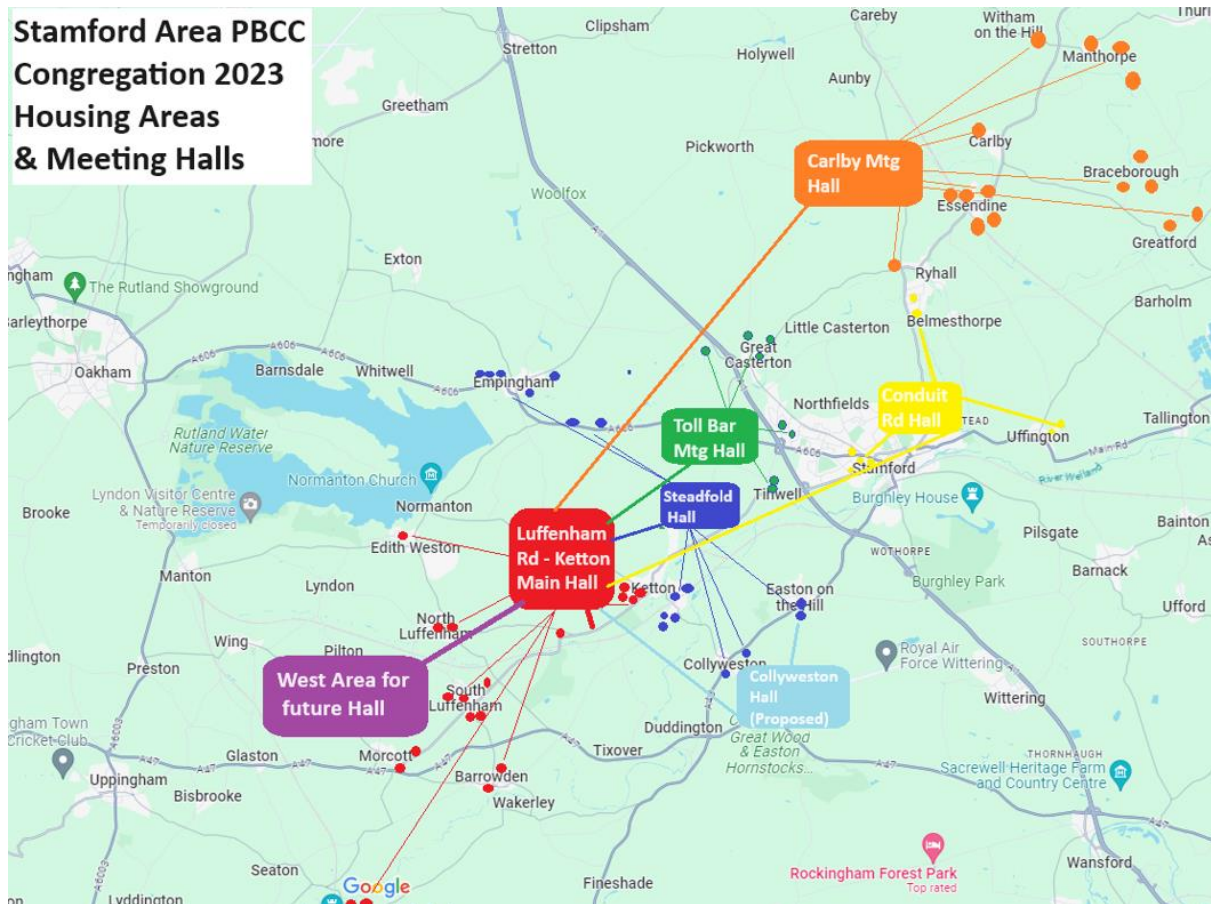
At present, the provision is shown overleaf with identified needs for –

- Increased capacity at the main city hall site.
- New smaller hall for west area.
- New hall for southern area.



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As a community facility and registered charity, it is sometimes difficult to compete with land values within settlement, which attracts residential value and also given the large proportion of rural dwellers within the congregation, the larger towns and villages can sometimes increase journey lengths.

There are two main specific representations that the CGHT would seek to make in the development of the new Local Plan.

1. Ensure that new churches are reflected within policy delivery and to allow flexibility of location for such services.
2. Designate the main existing City Hall site as an established employment /community use site within the countryside, close to Ketton.



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Community Facilities.

It is noticeable that Policy SS1 spatial strategy refers only to housing and employment, so it should be made clear that new churches should not be expected solely to be within planning limits of development.

NPPF 2023 Paragraph 89. "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. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does 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). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."

Should be clearly reflected in the policy wording or text.

Policy SS9 is not in accordance with NPPF 89, it should reflect the inclusion of community needs. This is missing and a clear error and omission. Employment is suitably referenced but community uses are not. Many PBCC churches are rural locations to serve rural congregations.

There is no reference within SS1, SS3 to immediately adjacent sites, which should be included for non-housing services.

Policy SC6 is supported in principle as it does not include a settlement requirement per se in line with NPPF 89, and as long as SC6 is given precedent over SS1, SS3 and SS9 then rural churches can come forward.

It is unclear what criterion c. refers to in being accessible for all members of society. If this is a disability requirement re ramps, level access etc. then it is acceptable, but it cannot be used to seek wider use beyond the protected characteristics of the religious faith concerned. Gospel services are open to the public, but the churches cannot be used for social purposes in relation to the religious status of the hall. This needs to be highlighted as shared use is not possible for all faiths.

The reasoned justification text should include references for the need for churches for growth to be taken into account in planning applications.



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Existing City Hall site, Ketton.

The interactive policy map shows the site and its immediate neighbour washed over by countryside. This in our view devalues the significant contribution this site close to Ketton makes for community facilities and employment.

It is a mixed-use site, which should be identified to reflect the following planning principles:

1. Full and effective use of existing PDL sites. NPPF 123 – *“Planning policies and decisions should promote an effective use of land in meeting the need for homes and **other uses**, while safeguarding and improving the environment and ensuring safe and healthy living conditions”.*
2. NPPF 97(d) – *“To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should: (d) ensure that established shops, facilities and services **are able to develop and modernise**, and are retained for the benefit of the community;*

The existing site should be allocated as an existing mixed use scope for its whole curtilage to allow enhancement of employment and community facilities at an existing site close to Ketton and already operating as such with established trip generation and use.



Site should be allocated within Local Plan interactive mapping as PDL employment / community use.

Kind Regards

p.p. PABeard

Andrew Beard MRTPI

Consultant