

PRE-SUBMISSION LOCAL PLAN REGULATION 19 REPRESENTATION RESPONSE FORM

Guidance Note

These notes are intended to assist you in making representations to Rutland County Council's Pre-Submission Local Plan. At this stage of consultation, the Council is seeking views on whether the Local Plan is legally compliant and meets the tests of 'soundness', as set out in the National Planning Policy Framework (NPPF), and summarised in the boxes below.

Legal Compliance

- The Local Plan should have been prepared in accordance with the Council's latest Local Development Scheme.
- The Local Plan should be accompanied by a Sustainability Appraisal and Habitat Regulations Assessment.
- Consultation on the Local Plan should have been carried out in accordance with the Council's Statement of Community Involvement.
- The Council should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters, known as the Duty to Cooperate.
- The Local Plan should comply with all relevant laws including the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

Soundness

- **Positively prepared** - provides 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.
- **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- **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.
- **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies including the National Planning Policy Framework.

General Advice

- This booklet has four parts:
 - Part A – Contact Details
 - Part B – Your Representation
 - Part C – Future Notifications and Privacy Notice
 - Part D – Other Monitoring Information
- You must provide your contact details within Part A of this booklet. We are unable to accept anonymous representations. The name of respondents and the representations made will be made available on the Council's website. Personal information such as telephone numbers, addresses, and email addresses will not be published. By submitting a representation you confirm your agreement to the publication of your name and consultation response.
- Please do not include any personal information within Part B of this booklet. All comments submitted as part of this consultation will be made publically available in reports and online.

- Comments which are deemed to be unlawful or discriminatory will be inadmissible and will not be accepted. We would ask that you avoid the use of such comments when making your representations.
- You will need to fill in a separate Part B for **each representation** that relates to a different part or issue of the Local Plan. This form only includes one representation form, however you can download a Response Booklet from the website at www.rutland.gov.uk/LocalPlanReview which provides multiple response forms in one document for ease of submitting more than one representation.
- You should be as concise as possible when making your comments.
- Where there are members of a group who share a common view on the Local Plan, a single representation will be sufficient. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- Responses must be received by the Council no later than **4.15pm on Friday 9th October 2020**.

Part A – Contact Details

Please tick as appropriate:

- Responding as an individual (complete section 1)
- Agent responding on behalf of a client (complete sections 1 and 2)
- Responding on behalf of an organisation (complete section 2)

1. Individual/Client Details (Please complete in block capitals)	
Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Postcode	<input type="text"/>
Tel. No (Daytime)	<input type="text"/>
Email	<input type="text"/>

2. Organisation/Agent Details (Please complete in block capitals)	
Title	<input type="text" value="PROFESSOR"/>
First Name	<input type="text" value="RICHARD"/>
Last Name	<input type="text" value="CAMP"/>
Job Title/Dept	<input type="text" value="VICE-CHAIRMAN, MANTON PARISH COUNCIL"/>
Organisation	<input type="text" value="MANTON PARISH COUNCIL AND MANTON RESIDENTS"/>
Address Line 1	<input type="text" value="14 PRIORY ROAD"/>
Line 2	<input type="text" value="MANTON"/>
Line 3	<input type="text" value="OAKHAM"/>
Line 4	<input type="text" value="RUTLAND"/>
Postcode	<input type="text" value="LE15 8ST"/>
Tel. No (Daytime)	<input type="text" value="01572 737729"/>
Email	<input type="text" value="richard.camp@mantonparish.org.uk"/>

Part B – Your Representation

Important note: You must complete a separate Part B for **each representation** that relates to a different part or issue of the Local Plan. Part B on this form contains one response form. If you are submitting more than one representation, please download the Response Booklet from www.rutland.gov.uk/localplanreview which provides multiple representation forms.

Representation

1. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph Number	3.7, Strategic Objective 2: Deliver a new garden community
Policy Number	Policy H2 - St George's garden community development and delivery principles (Local Plan page 50); and Policy H3 - St George's garden community development requirements (Local Plan page 51)
Table Number	Table 2: Housing completions, commitments and proposed sites by settlement category; St George's Garden Community Total supply 1000 (Local Plan page 45)
Figure Number	N/A
Appendix	N/A
Policies Map Reference	'St George's Garden Community Inset 64' (included in the hard copy of the Local Plan on the large fold-out map at the back) and shown on-line as part of Rutland Local Plan Reg 19 Policy Main Map Side 2

2a. Do you consider the Pre-Submission Local Plan to be legally compliant?

Yes:

No: **X**

2b. If you responded no, please provide an explanation below (See Guidance on Page 1)

For clarification of the Organisation Details in Part A above, Manton is a village of 289 electors on the south shore of Rutland Water, approximately three miles west of Edith Weston village and St George's Barracks (SGB). This representation is submitted for and on behalf of Manton Parish Council and is supported by 147 residents of Manton^a who have been sent an introductory email with the full representation attached. Interested residents who do not use email have been offered a similar introductory statement and the full representation in hard copy. *The representation opposes proposals in the Local Plan regarding the future of SGB.* It should also be noted that many statements in this Representation are supported by references to specific documents. Where such documents are not immediately available to the Inspector copies could, if required, be supplied by email.

a. Names and addresses of all supporters are listed in an Appendix which has been supplied to Rutland County Council as a separate document.

1.1 As indicated on page 1 of this Response Form, legal compliance requires that consultation on the Local Plan should have been carried out in accordance with the Statement of Community Involvement of Rutland County Council (RCC). There are circumstances where requirements of the Statement of Community Involvement appear not to have been observed by RCC during development of the Local Plan^a.

a. The RCC Statement of Community Involvement - Second Review, August 2020, states the following in paragraph 3.18: 'At an early stage, it is important to involve the local community in the preparation of planning policy documents. This is essential to achieve local ownership of the planning policies for Rutland'.

1.2 The Ministry of Defence (MoD) aims to vacate St George's Barracks (SGB) in 2022. A Rutland Local Plan Development Plan Document was published by RCC in July 2018 involving a Regulation 18 specific consultation considering the implications of potential development of SGB within the

Local Plan. At this time a 'Summary Guide to St George's Barracks High-Level Masterplan' was co-published by RCC and the MoD, proposing in one section the development on the vacated SGB site of 'some 3000 new dwellings, along with employment, a school, local centre, open space and other facilities.' A subsequent sentence also indicates the 'potential for a future satellite community of some 500 homes in the eastern part of the site.'

1.3 Regulation 18 consultation on these proposals occurred from August to September 2018 and led to over 1500 responses, mostly objections. In the RCC summary of Regulation 18 consultation responses^b it is documented in Section 3, page 19, that 96% of respondents were against the proposed size of the SGB development. On page 20 of the same section, a graph shows that more than 85% of this section's respondents strongly disagreed with the proposal to build 3000 homes at SGB, and more than 80% strongly disagreed with the proposal to build 2000 homes there.

b. RCC 'Summary of Consultation Responses - Local Plan Review - Specific consultation considering the implications of potential development of St George's within the Local Plan - August-September 2018'

1.4 The Regulation 18 consultation on the SGB 'High Level Masterplan' was soon followed by the co-publication by RCC and the MoD of the very detailed 'St George's Barracks, Rutland Evolving Masterplan – Phase II (November 2018)'. This proposes a final total of 2215 dwellings on the main part of the site.

1.5 This 'Evolving Masterplan' was approved at the RCC Cabinet meeting on 18 December 2018 and used in RCC's application for a government Housing Infrastructure Fund (HIF) Forward Funding Grant of nearly £30 million, in support of SGB infrastructure development^c.

c. This is stated in section 3.2 of RCC's HIF Business Case, published with the Cabinet Agenda of 18th December 2018, and is published on-line as an RCC news item on 22nd January 2019.

1.6 Preparation of the lengthy SGB 'Evolving Masterplan' (71 double pages) would have started at a stage when the analysis of the SGB 'High Level Masterplan' Regulation 18 consultation responses had barely begun, if not well before that (the Summary of Consultation Responses was published several months into 2019, although it is incorrectly dated as March 2018). This procedure indicates that RCC paid little if any regard to the Regulation 18 responses when involved in co-producing their next SGB Masterplan and thus showed little intention of gaining local community ownership of the Plan. The lack of effective engagement and failure to achieve local planning policy ownership are contrary to conditions in RCC's Statement of Community Involvement (as outlined in paragraph 1.1 above) and to the requirements of the National Planning Policy Framework (NPPF)^d. The legality of RCC's evident failure to consider the responses to Regulation 18 consultation when producing their next SGB Masterplan is thus open to question.

d. The February 2019 NPPF, paragraph 16c), requires that the Local Plan "should be shaped by early, proportionate and effective engagement between plan makers and communities.."

1.7 The very detailed 'Evolving Masterplan' has also never been subjected to Regulation 18 consultation, even though it was used to support the £30 million HIF bid (as in paragraph 1.5 above). The 'Consultation & Engagement' described in Section 6.0 (page 45 onwards) of the 'Evolving Masterplan' took place from November 2017 to June 2018 and dealt with the original 'High Level Masterplan' proposing development of up to 3500 homes at SGB. A schedule of related 'drop-in' sessions is listed on page 45 of the 'Evolving Masterplan' document, but most of these were poster presentations attended by RCC officials, with no real opportunity for residents to express and record objections. Subsequently Parish Councillors insisted that drop-in events at Edith Weston and Manton should involve a chaired question and answer session attended by senior RCC Executives and Councillors. The degree of objection to the 'High Level Masterplan' was then obvious. At the Manton drop-in of 4th June 2018, chaired by the current Vice-Chairman of Manton Parish Council and attended by the RCC Chief Executive and the Leader of the Council, a show of hands by the large number of Manton residents in attendance indicated virtually unanimous rejection of the Masterplan, with not one expression of support. No reference is made in the 'Evolving Masterplan' of November 2018 to the Regulation 18 consultation on the earlier 'High level Masterplan'. This additional information confirms that little or no regard was paid to the Regulation 18 'High Level Masterplan' consultation responses during preparation of the subsequent 'Evolving Masterplan', an action of questionable legality.

1.8 It was evident in late 2018 that RCC was doing little to involve the local community in the

cooperative development of its SGB plans. The effectiveness of the letter by the current Vice-Chairman of Manton Parish Council to the Leader of the Council expressing concern about this is uncertain, but SGB 'Advisory Group' meetings were set up soon after. These were attended by relevant Parish Councillors, RCC Officers, Rutland County Councillors, certain consultants and an MoD representative. Parish Councillors objected frequently and formally about the size of the proposed SGB development at these meetings but little heed was paid by relevant County Councillors to these concerns. The Advisory Group meetings were eventually abandoned by RCC without notice or any other communication with participating Parish Councillors. This lack of effective community engagement in order to achieve local ownership of planning policies is also contrary to RCC's August 2020 Statement of Community Involvement, paragraph 3.18^a, and is therefore of questionable legality.

a. See 1.1 above for the wording of paragraph 3.18 (paragraph 3.18 of the preceding Statement of Community Involvement of January 2014 is almost identically worded)

A further issue of legality is raised in paragraph 2.5 below

3a. Do you consider the Pre-Submission Local Plan to be sound?

Yes

No

3b. If you consider the Pre-Submission Local Plan to not be sound, please select which test(s) of soundness this relates to? (See Guidance on Page 1)

Positively prepared

Justified

Effective

Consistent with national policy

3c. Please provide an explanation below.

2. The full size of the SGB development

2.1 Although the submitted Local Plan proposes a build of 1000 dwellings on the SGB site up to the year 2036 (Table 2 at paragraph 5.6), a critical issue for the local area and Rutland in general is the ultimate size of the proposed town, development of which would extend beyond 2036.

2.2 Failure to consider the impact of the full development now may well lead to the start of an ultimately unsustainable build and a failure to meet several Sustainable Development Principles outlined in the Local Plan Policy SD1 (page 28) as will be reviewed in certain of the following sections^a.

a. See, for example, paragraphs 2.4, 3.1 to 3.5, 4.1 to 4.6, 5.3, 6.2, 7.5 and 7.6

2.3 It is of relevance that the proposed 70 dwellings on the Officers' Mess site of SGB (which is clearly a component of the current barracks) are not included as part of the main SGB 'garden community' development but are listed as a development in the Local Service Centre of Edith Weston^b. The 30 dwellings that RCC has proposed for development on the site of the primary school in Edith Weston once the new school at SGB is functioning are not mentioned in the submitted Local Plan. Thus, the total number of dwellings currently proposed for ultimate development at or immediately adjacent to Edith Weston is 2315. The emerging full masterplan is stated to be at an advanced stage but is not yet formally part of the submitted Local Plan for the area.

b. As shown in H1.8 of the Policy H1 table following paragraph 5.14 of the submitted Local Plan (page 47)

2.4 In population terms the full SGB development would be larger than the current size of Uppingham, Rutland's second largest town. Any reasonable analysis would conclude that the immediately adjacent village of Edith Weston and the almost adjacent village of North Luffenham would be swamped. It is disingenuous for the Local Plan to state that the development will 'complement' these two historic villages (Local Plan page 24, Strategic Objective 2), especially in

the light of a key SGB risk documented by RCC and the MoD in their Memorandum of Understanding, which states that the adjacent villages 'will be key stakeholders but will potentially be dwarfed by the size of the new community'^c. The SGB aspect of the Local Plan also conflicts with RCC's Corporate Plan which states that one of its primary aims is to keep Rutland 'rural and sparsely populated'^d. Furthermore, Local Plan Policy SD3 concerns development within planned limits of development in relation to villages defined in Policy SD2, these villages including Edith Weston and North Luffenham. Importantly, the full SGB development would lie entirely within the Parish areas of these two villages. Local Plan Policy SD3a states that development must be appropriate in scale to these settlements, which it clearly will not be (bearing in mind the above statement in the Memorandum of Understanding). Policy SD3b also states that the development should have no detrimental impacts on the character, appearance or setting of the settlements or their surroundings. Again, a reasonable, objective analysis would conclude that the full SGB development is very likely to have these adverse effects. **For these reasons it is logical to conclude that the proposed SGB development is not justified and that the Local Plan is therefore not sound.**

c. This is stated at Ref R10 of Table 2 (Initial risk log) on page 10 of: Rutland - One Public Estate - Memorandum of Understanding between Rutland County Council and the Ministry of Defence (St George's), final August 2017

d. Rutland County Council Corporate Plan 2019-2024 states this on page 5 under 'Our Vision for a Stronger Rutland'

2.5 Parish Councillors have frequently and formally protested to RCC about the size of the proposed SGB development, for example at the Advisory Group meetings outlined in paragraph 1.8 above. Concern has also been expressed about the close cooperation between RCC and the promoter of the SGB development, the MoD. This cooperation followed the introduction of a Memorandum of Understanding (MoU) between RCC and the MoD (final version dated August 2017), described as a way of working which is *the first of its kind in the UK*^e. Paragraph 1.3.2 of the MoU states that 'The MOD and RCC agree that working in partnership is the best way to maximise the potential for the site and thus maximise the capital receipt for MOD' (sic). The level of cooperation between RCC and the MoD is illustrated by the Agenda Reports Pack/Public Document Pack record of the RCC Cabinet meeting of 18 December 2018, which gives details of housing requirement, income and expenditure acceptable to the MoD. This apparently unique level of co-operation between a local planning authority and a development promoter raises questions about the authority's ability to exercise impartiality if faced with the need to judge a subsequent proposal for development that might be an alternative to SGB (as in the case of the Woolfox proposals outlined in the submitted Sustainability Appraisal and other documents). This conflict of interests is particularly likely to occur if the MoU is in place some years ahead of Local Plan submission, as is applicable here. **The legality of the MoU between RCC and the MoD is therefore of interest and is apparently without precedent.**

e. See <https://www.stgeorgesrutland.co.uk/partnership/>

2.6 In response to the above expressions of concern, senior Rutland County Councillors and Sir Alan Duncan (local MP at the time) have stated verbally and in writing that RCC's MoU with the MoD, and RCC's co-operative SGB planning with the MoD, are in the best interests of Rutland. Without this, we are advised, the MoD and Homes England will simply ride roughshod over any alternative Local Plan, building 4-5,000 houses on the SGB site so as to maximise MoD revenue^e. It would be inappropriate for a Government Ministry to act in this manner, especially if an alternative, adopted local plan has been in place that is up-to-date, is produced in co-operation with and is approved by local Parish Councils, that incorporates a much more modest development at SGB (say 350 dwellings), that is strictly National Planning Policy Framework (NPPF) compliant and that takes into account significant material considerations. **This advice by RCC and Sir Alan is not a sound planning argument.**

e. For example, the following is an extract from an email sent by Sir Alan Duncan to a concerned Manton resident on 5 April 2019: 'If the MOD were left just to get on with it without the Council they would probably build 4,000 – 5,000 houses without any constraint on their design beyond obvious building regulations and planning laws.... Those who oppose Rutland Council's cooperation with the MOD are perversely the ones who make it likely that the maximum number of houses would be built, because even if the Council were to cease working with the MOD and then refuse planning permission for an MOD application, it would without doubt be granted on Appeal.'

3. Unsound SGB Employment Strategy Report

3.1 At least 14 hectares of employment land are proposed for the site^a, which it is stated will act

as a focal point for new enterprise^b. Policy also states the promotion of working from home^c. It should, however, be noted that the top three industries in Rutland in 2018 were general secondary education, restaurants and mobile food service activities, and beverage serving activities^d, and that the major employers with importance to the economy include the MoD establishments at Cottesmore and SGB, HM Prison at Stocken Hall, independent schools at Oakham and Uppingham, Hanson Cement at Ketton, and RCC itself in Oakham^e. These facts do not lead to any confidence that infrastructure is in place to attract enterprising businesses to SGB.

- a. Submitted Local Plan, paragraph 5.15
- b. Submitted Local Plan, paragraph 5.16, 4th bullet point; also Policy H2, part 2 (page 50)
- c. Submitted Local Plan Policy H2, part 2 (page 50)
- d. Submitted Local Plan paragraph 2.13
- e. Submitted Local Plan paragraph 2.14

3.2 In August 2019, RCC and the MoD co-published an Employment Strategy Report^f which proposes (paragraph 3.3) that the full SGB development will generate scope for more than 2000 local jobs. This Employment Strategy Report has been analysed by a Manton businessman with key experience in business relocation. He insists that the Report is not a strategy but a flawed wish list, presenting many facts and figures the validity of which must be questioned, inappropriate comparators for example being quoted.

- f. Prepared by BBP Regeneration, dated December 2018 and available at <https://www.stgeorgesrutland.co.uk/supportinginformation>

3.3 Currently almost 40% of Rutland residents commute out of county, primarily to Peterborough, South Kesteven, Leicester and Corby (submitted Local Plan, paragraph 2.17). These destinations as well as Cambridge, Stamford and Grantham would be highly likely to attract employees away from St George's as they have large business infrastructures. This, the above-mentioned businessman believes, will leave Rutland with a large commuter estate. The main focus of the Employment Strategy Report, he believes, should have been on what there is to attract businesses and thus jobs to the location, a key question that the Report fails to address. A brief review of the Employment Strategy Report, by the Manton businessman, is given below^g. Further questions put to RCC about the work it has done to encourage business employment at the future SGB development have not produced convincing responses. **There is thus no evidence as to how employment will grow in this area, and in addition existing economic centres are very likely to draw employment away from SGB, which indicate an ineffective and therefore unsound Local Plan.** Furthermore, the process does not align with NPPF paragraph 8 a) (employment is not in the right place) nor with Policy SC2 (part 3, page 117) of the submitted Local Plan (which requires that the Plan should minimise the distance people need to travel to employment opportunities). The process is also likely to fail Sustainable Development Principle b) of Policy SD1 (page 28) which requires that local development should minimise the need to travel.

g. **Some comments on the Employment Strategy Report**

In Section 2 of the Report (concerning Context) reference is made repeatedly to comparator locations but these are not identified and are thus meaningless. It is unclear what these comparisons are expected to clarify.

In the section on Commuting Patterns, there is no analysis as to why so many people commute out of Rutland to higher paid jobs in multiple cities elsewhere. This raises an important question which has not been answered: what jobs would have to be created to attract residents to stay in Rutland for work?

Paragraph 2.4 indicates that the County Council's economic growth strategy is set within specific strategic themes. This strategy could apply to any UK location and does not give any idea as to how economic growth planning could be achieved in such a way that makes Rutland more attractive than its competitors. Sections 2.5 to 2.8 are a set of aims for economic growth, again with no indication of how they are to be achieved and at what cost. Without some comment on how these aims are to be achieved this is just a wish list and not a convincing strategy.

Comments in Section 2 on the Greater Cambridge Greater Peterborough Local Enterprise Partnership and the Leicester and Leicestershire LEP are no longer appropriate (if they ever were in this context) because in May 2020 Rutland joined the Lincolnshire LEP.

Paragraph 2.25 *et seq* describe an employers' workshop where local employers gave positive feedback on provision of employment land at St George's, but there is no mention of specific commitment. Paragraph 2.28 *et seq* describe a meeting with local agent, Moore Commercial, when it was suggested that there is sufficient demand to make commercial development at St George's financially viable and deliverable by the private sector. Again, details are limited and there is no indication that specific companies would be interested. Furthermore, no evidence is presented as to whether the new St George's residents are likely to have the skill sets required by the local industries. Indeed, if the Plan proceeds, it is likely that residents would commute out of Rutland for work, with the new local commercial enterprises (if they materialise) attracting commuters in from out of County, thus creating a commuter estate with a great deal of vehicular movement.

In Section 3, on St George's employment needs, specific numbers of described jobs and workspace areas are listed, but there is weak indication as to how these numbers were derived and which assumptions were made. In Section 4 (dealing with the delivery of employment at St George's) the option that the Council should assume a lead role as strategic

developer is regarded as best. However, one must ask whether the Council has the resources (in terms of both funds and staff expertise) to manage such a complex project, especially considering the size of the Council itself.

Space prevents more detailed comment, but to conclude it is evident that a lot more work and detail are required to provide a valid Employment Strategy framework here. What is reported does not give any reassurance of success and could lead to a very expensive failure.

3.4 It is also relevant that RCC is currently dealing with planning application 2019/0736/FUL, which is seeking retrospective approval for development of a lorry park for 1200 trailers and large numbers of tractors on an SGB site that will occupy part of the northern business zone shown in the plan on page 54 of the Evolving Masterplan of November 2018. This planning application proposes that the lorry park should be approved for use for 10 years, that is up to 2029 which is well into the proposed SGB development process. The relevant on-line RCC planning page shows two letters indicating that the MoD has no safeguarding objections to the proposal. Furthermore, a letter from the Defence Infrastructure Organisation Secretariat of 3 July 2020 indicates that the matter is being addressed, but no conclusion is indicated. This very large lorry park requires only 2 full-time employees, which does little to satisfy the above RCC aim that there will be scope for more than 2000 jobs at SGB. **Lack of clarity on the role this proposed development will play in the future SGB business zone is not justified and indicates a lack of Plan soundness.**

3.5 Oakham Enterprise Park is a 10-hectare site adjacent to Oakham, Rutland's major town. The site was previously occupied by a prison which was vacated in 2011. Ownership was transferred in early 2013 from the Ministry of Justice to RCC who designated it as *a site for business enterprise*. In spite of this, derelict land there has not been upgraded, one area has been mothballed, tenants have been relocated, there is insufficient demand for business occupation and demolition costs of £350,000 are not thought currently to be cost effective (clarified at the RCC Cabinet meeting on 19th August 2020). Furthermore, the submitted Local Plan Priority Theme Strategic Aim 1.2b (following paragraph 2.34, page 17) states the need to 'Commit to the development of a strategic plan for Oakham Enterprise Park'. It is remarkable that this potentially highly sustainable site at Oakham, with ready access to rail and bus transport and within walking and cycling distance of dwellings, has not yet been properly developed for business, considering that the cost of this would be a small fraction of the almost £30 million HIF grant proposed for SGB. **This raises questions about the effectiveness of RCC's business strategies. The proposal to develop multi-hectare business sites at SGB appears neither to be justified nor likely to be effective, and thus renders the Plan unsound.**

4. The local minor road network and unsound Transport Assessments

4.1 A critical issue associated with a large housing development in a rural setting is the associated road network. Notably, SGB is supplied only by minor roads, that going south to the A47 having to pass over a sometimes busy level crossing. That going west passes through Manton village to meet a difficult T-junction with the A6003, and that going east towards the A1 and Stamford meets a difficult T-junction with the A606.

4.2 RCC, with the MoD in one case, has commissioned three Transport Assessments. The AECOM assessment of April 2018 relates to the impact on transport of the original SGB 'High Level Masterplan' proposing up to 3500 dwellings. The assessment by CampbellReith of November 2018 deals with the impact on transport of the subsequent 'Evolving Masterplan' of November 2018, proposing 2215 dwellings on the main part of SGB. The AECOM report (prepared for RCC) relies entirely on traffic counts carried out on 5th October 2017 and during the week from 5th to 11th October 2017 (see AECOM, paragraph 7.2). The subsequent CampbellReith report (prepared for RCC and the MoD, see paragraph 1.1 of the report) also relies on the traffic counts on 5th October 2017 (see CampbellReith paragraph 5.9.12 and multiple following paragraphs) with one additional count on 15th November 2018 (paragraph 5.9.21). The third assessment, by Amey Consulting (July 2019, commissioned by RCC) is a desktop review of the above two assessments by AECOM and CampbellReith.

4.3 The CampbellReith document justifies use of traffic counts on 5th October 2017 by proposing that it is a neutral day in a neutral week for traffic movements and therefore a representative sample (paragraph 12.5.1). Importantly, no evidence is presented to confirm that this date would be

representative of activity around a tourist destination. Whatever conclusions are drawn about key junctions and roads that would predominantly be affected, and the mitigation measures needed, it is risky to base these conclusions on counts largely taken on a single day or limited period in October 2017 which is not within the tourist season and five busier months of the year. When this issue was raised at an RCC Scrutiny Committee meeting on 19th December 2019, residents were concerned by the response, which made assumptions about summer traffic to Rutland Water having little additional impact. This is a risky assumption in the light of the 1.7 million tourists who visit Rutland every year, with Rutland Water being a major attraction^{a,b}, and with a large Rutland Water car park being immediately adjacent to Edith Weston, where there is a major point of cycle hire for the Rutland Water cycle path. The large Rutland Water sailing club is also adjacent to Edith Weston. The argument that summer traffic will have little additional impact is not supported by traffic counts carefully taken by Manton residents. The two-way 24-hour weekday count in October 2017 on the road between Edith Weston and Manton is reported in both AECOM (paragraph 3.2.2) and CampbellReith (paragraph 5.9.8) documents as 3010. In contrast, the two-way count by Manton residents on Friday 17 August 2018, from just 6.30 am to 8 pm was over 3800^c.

a. See paragraphs 6.19 and 6.20 of the submitted Local Plan.

b. Analysis of Rutland Water car parking data by Anglia Water indicates a summer peak of visitors to principal parking areas (~600,000) - see paragraph 5.2.4 on page 45 of the Habitats Regulations Assessment (March 2020) by Wood Environment and Infrastructure Solutions.

c. Counts of two-way motor traffic (shown in brackets) through Manton on 17 August 2018, carried out by Manton residents: 06.30-08.00 (268); 08.00-10.00 (559); 10.00-12.00 (543); 12.00-14.00 (579); 14.00-16.00 (676); 16.00-18.00 (732); 18.00-20.00 (459). **Total 06.30 – 20.00 (3816)**

4.4 A key junction that could be affected by traffic to and from the SGB development is that between the A606 going east of SGB and the A1. Paragraph 9.4.7 of the CampbellReith document stresses the strategic nature of this junction and indicates that further assessment is needed. The following paragraph (9.4.8) and paragraph 12.12 indicate that discussions with Highways England regarding the anticipated impact of the proposed SGB development on the Strategic Road Network are ongoing, but there is no indication in this document or in the Local Plan as to whether any conclusions have been drawn. **Apart from other assessments, paragraph 102 of the NPPF requires that transport issues should be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks can be addressed. The impact of the full SGB development on the A606/A1 junction has not been clarified either with or without cooperation with Highways England. This unclear planning is not justified and therefore renders the Local Plan unsound.**

4.5 It can therefore be judged that any conclusion, arising from the above three SGB transport assessments, that the road network will not be seriously impacted by the full RCC development outlined in the Evolving Masterplan, is based on incomplete evidence and renders the Local Plan unreliable, unjustified and therefore unsound. In the absence of complete and proportionate evidence necessary for the plan-making stage it is unclear whether the test in paragraph 109 of the NPPF will be met. The latter states that 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.' It is also likely that the Plan will compromise the ability to secure sustainable transport (Policy SC2 of the submitted Local Plan, page 117). **Impact on the local minor roads will also be high if significant job-creation at SGB fails and the development becomes a large commuter estate, as outlined in paragraphs 3.3 above and 4.6 below.**

4.6 *Importantly, further evidence for the likelihood that the proposed SGB development would become a commuter estate has recently been published by Transport for New Homes (June 2020), in a detailed analysis of 20 new 'garden communities'^c. Conclusions based on visits and research indicate that there is an enormous gap between the garden community visions presented by government, consultants and local councils, and the developments likely to be built in reality. The problem centres, the document concludes, on building in the wrong location and around the wrong kind of transport. **Rather than being centred on sustainable transport, the document also concludes, it looks like garden communities will become car-based commuter estates.** This research-based conclusion contradicts the vision of Lord Taylor concerning the value of garden communities, as outlined on page 9 of the SGB 'Evolving Masterplan' of November 2018.*

c. See 'Garden Villages and Garden Towns: Visions and Reality' at www.transportfornewhomes.org.uk

5. Essential and possible risk-associated HIF grant not yet approved by RCC full Council

5.1 RCC has been offered a near £30 million Government HIF Forward Funding Grant to support development of infrastructure at SGB.

5.2 At a minuted full Council meeting of RCC on 20th January 2020 the acceptance of the HIF grant and the risks associated therewith were discussed. It was resolved that the HIF grant should not be accepted at that stage, that the terms and conditions of the grant should be clarified and the item returned to full Council for further debate at a later stage.

5.3 A current critical issue concerns the fact that the viability of the proposed SGB development has repeatedly been stated to be dependent on the availability of the HIF grant funding^a. The acceptance of the HIF grant has yet to be decided upon at the time of submission of this Local Plan. **Submission at this time is therefore not justified and for this reason the Plan must also at this time be considered unsound.**

a. In the Local Plan Pre-Submission Viability Update (Final, February 2020) by HDH Planning & Development, the following is stated under Conclusions, paragraph 12.81: 'We recommend the Council is cautious with regard to including this site in the Plan pending the outcome of the HIF process. If the HIF bid on the St George's Barracks site is successful, the Council will then be able to demonstrate that this site is deliverable and will come forward'. The key role of the HIF grant in the viability of the proposed SGB development has also been stated by senior RCC Councillors.

6. Unjustified strategy on development of brownfield (previously developed) land

6.1 RCC Cabinet Councillors and the then Chief Executive have repeatedly, and apparently without further critical analysis, claimed that the entire curtilage of SGB, *including the golf course and ecologically sensitive airfield*, are 'brownfield land' and therefore primary land for development. The SGB Evolving Masterplan of November 2018 shows that a portion of the proposed SGB build would involve the golf course and airfield. The NPPF (February 2019) definition of brownfield (previously developed) land is open to interpretation. It should be noted that NPPF paragraph 137 a) states that the authority should make 'as much use as possible of *suitable* brownfield sites'. There is much evidence, as indicated in this representation, that an extensive housing development at SGB is not suitable nor is it likely to be sustainable. Policy SD1c) of the Local Plan (page 28) also requires that new development should make the most productive use of previously developed land in *sustainable* locations.

6.2 The NPPF also states, on page 70 under the definition of 'Previously developed land' that the latter may exclude land where the remains of the permanent structure or fixed surface structure have blended into the landscape. Clearly this could apply to the airfield and golf course at SGB, both of which occupy a large area and are manifestly and largely green. Use of the golf club began in 1975 and the airfield has been unused by aircraft since 1972. It can be argued that it is *not justified* to target development on manifestly green land, which has been in that state for decades, on the grounds of an uncertain technicality. **The evidence in paragraphs 6.1 and 6.2 questioning the assumptions by RCC further suggests an unsound plan.**

7. Lack of clarity about minerals extraction

7.1 As shown on 'St George's Garden Community Inset 64' of the submitted Local Plan (part of Rutland Local Plan Reg 19 Policy Main Map Side 2), a large portion of the SGB airfield occupies a Minerals Safeguarding Area, containing significant deposits of limestone and clay suitable for cement production.

7.2 Comparison of the coloured-in Minerals Safeguarding Area of Inset 64 with the development design of the Evolving Masterplan of November 2018 (page 54) shows the close proximity of housing to the potential quarry area.

7.3 Paragraph 9.16 (last sentence) and Policy MIN4 (page 136) of the submitted Local Plan state that preference would be given to proposals for extraction from that part of the Minerals Area of Search identified in the 'St George's masterplan'. This preference is stated to 'complement delivery of the St George's Garden Community' (Plan paragraph 9.50).

7.4 It is patently unclear how this preference will 'complement' the SGB delivery. *It is also unclear where and when the quarrying will begin in relation to SGB development, to what extent it will occur and what its duration will be.*

7.5 Quarrying immediately adjacent to the proposed SGB development would be a matter of great concern to future developers and potential residents. **It is unclear how SGB will be delivered during the Plan period alongside a quarry. The Plan here is not effective which renders it unsound.**

7.6 Furthermore, if preference is given to extensive quarrying of the airfield, a significant portion of the Country Park mentioned in Policy H3 g) on page 51 of the submitted Local Plan and illustrated on page 54 of the SGB Evolving Masterplan (November 2018) will cease to exist. **Lack of clarity on this matter is not justified and indicates an unsound plan.**

4. Please set out the modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and/or sound, including any revised wording

Apart from evidence for the failure of RCC to comply with its Statement of Community Involvement, the currently submitted Local Plan is unsound in several areas, as outlined above. These issues will all be resolved if that part of the Plan dealing with St George's Barracks (SGB) is changed considerably. In this respect, analysis of the Summary of Consultation Responses to the Draft Local Plan Review of July-September 2017 (published by RCC in April 2018) is of importance. This former draft Plan proposed new housing focused particularly on Oakham, Uppingham and the Local Service Centres, as shown in the table in paragraph 5.19 (page 50) and in Policy RLP12 (page 53) of the 2017 draft Plan. No new development was at that stage proposed for SGB, the developments all being based at sites more sustainable than the currently proposed very large development at SGB. The Summary of Consultation Responses to this 2017 draft Plan revealed relatively muted objections or support. For example, in Chapter 5 of the Summary of the Consultation Responses document, page 16 (fifth bullet point), one response states 'Oakham Town Council considers that the strategy proposed in the Local Plan is aligned with the Town Council's vision for the development, sustainability and needs of Oakham Parish.'

A total development of 350 dwellings at SGB (which should include dwellings on the Officers' Mess site) in addition to *appropriate alternative uses* of the vacated land would, it appears, be acceptable to local residents, require no significant new infrastructure^a and be readily sustainable. This would require larger developments at Oakham, Uppingham and the Local Service Centres as outlined in the 2017 Draft Plan, although these developments would be smaller if the inappropriate 650-dwelling 'gift' to South Kesteven District Council were disallowed. In comparison to the near £30 million HIF grant, a relatively small amount of expenditure could be directed to redevelopment of the 10 hectare Oakham Enterprise Park (see paragraph 3.5 above) which would lead to a much more sustainable business area than that at SGB, and would contribute, together with new housing at Oakham, to the long-term viability of the town centre. A smaller housing development at SGB would also not threaten the long-term viability of Uppingham town centre.

a. As indicated in the AECOM Sustainability Appraisal (May 2020), Table 5.1 (page 20), St George's Barracks, Lower growth (350 homes)

5. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Manton Parish Council currently represents a total of 289 electors and will be affected by the SGB proposals. The Parish Council Vice-Chairman, who holds responsibility for matters involving SGB, could elaborate on and examine matters raised which are critical to the soundness of the Plan.

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

Part C– Future Notifications and Privacy Notice

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box(es):

- √ Submission of the Local Plan to the Secretary of State for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004
- √ Publication of the recommendations of the Planning Inspector appointed by the Secretary of State to carry out the independent examination
- √ Adoption of the Local Plan by the Council
- √ Future revisions to the Local Plan, new planning policies and guidance

How we will use your information

We will use your details to contact you regarding your comments on the Local Plan consultation.

In submitting comments to this consultation we are also required, under The Town and Country Planning (Local Planning) (England) Regulations 2012, to notify you of when the independent examination will take place. We will use the contact details you have provided to do this.

Please note: At the end of the consultation period, all comments will be made public and will be submitted to the Secretary of State, who will pass them to a Planning Inspector, along with the Local Plan and other relevant supporting documents. Your comments and name will be published, but other personal information will remain confidential.

Your comments will be reviewed by the independent Planning Inspector appointed by the Secretary of State to carry out the independent examination for the Local Plan. You may be invited to discuss your comments at the oral examination if you have expressed a wish to do so.

If you chose not to provide your data for this purpose, or ask us to erase your data, you will be unable to participate in the Local Plan process.

If you would like to find out more about how the Local Plan Team at Rutland County Council use your personal data please go to <https://www.rutland.gov.uk/my-council/data-protection/privacy-notices/planning-policy/local-plan>.

Part D – Other Monitoring Information

We are asking for the following information so that we can ensure that the consultation has been accessible to everyone. We are required to do this by the Equality Act 2010. This is however an **optional** part of the form. Any personal data provided will not be published alongside your representation.

1. What best describes your gender?

Male Female
 Transgender Prefer not to say

Prefer to self-describe:

2. What age group do you belong to?

Under 16 years 16-24 years 25-34 years 35-44 years
45-54 years 55-64 years 65-74 years 75+ years

3. Do you consider yourself to be a disabled person?

Yes No

4. What is your sexual orientation?

Bi-sexual Heterosexual Gay Lesbian
 Prefer not to say

5. What is your religion?

None Christianity Judaism Islam
 Buddhism Sikhism Hinduism Other
 Prefer not to say

If other, please state:

6. What is your ethnicity?

<input checked="" type="checkbox"/> White British	<input type="checkbox"/> White Irish
<input type="checkbox"/> Gypsy or Traveller	<input type="checkbox"/> Travelling Showperson
<input type="checkbox"/> Any other White background	<input type="checkbox"/> Asian or Asian British: Bangladeshi
<input type="checkbox"/> Asian or Asian British: Chinese	<input type="checkbox"/> Asian or Asian British: Pakistani
<input type="checkbox"/> Any other Asian or Asian British background	<input type="checkbox"/> Black or Black British: African
<input type="checkbox"/> Black or Black British: Caribbean	<input type="checkbox"/> Any other Black or Black British background
<input type="checkbox"/> Mixed: White and Black African	<input type="checkbox"/> Mixed: White and Black Caribbean
<input type="checkbox"/> Mixed: White and Asian	<input type="checkbox"/> Any other background
<input type="checkbox"/> Prefer not to say	

If other, please state:

Signature:



Date: 3rd November 2020

Please return this form to Rutland County Council no later than **4.15 pm on Friday 6th November 2020**):

By Email: localplan@rutland.gov.uk

By Post: Local Plan Team, Rutland County Council, Catmose House, Catmose Street, Oakham, LE15 6HP