



North Luffenham Parish Council

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NLPC/Planning

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The Planning Policy Manager,
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By email: localplan@rutland.gov.uk

DRAFT LOCAL PLAN REVIEW 2016 – 2036

Reference:

A. Draft Rutland Local Plan

1. Thank you for the opportunity to comment upon Reference A and for the clear briefings presented by Officers to Parish Council representatives in August.
2. The proposals contained in the Draft Local Plan 2016 - 2036 have little direct impact here in North Luffenham for the following reasons:
 - No additional residential development sites within the village have been identified.
 - At present the Village has yet to develop a Neighbourhood Plan and therefore there is no ambiguity or conflict between the Local and Neighbourhood Plan
 - No proposals in the plan adversely affect the village and its inhabitants.
 - Planned limits of development have not changed.
 - There is little remaining opportunity for 'in-fill' development in the village beyond that already identified.
3. Of far greater importance to North Luffenham is the potential development of the St George's Barracks site, proposals for which we understand will be encapsulated in an additional document at a later point. The significance of this development is huge and clearly has the potential to dwarf many of the planning considerations and proposals contained within the draft local plan. We look forward to working with RCC, MoD and Edith Weston Parish Council as a significant stake-holder in this project.

4. Detailed observations on the plan are encapsulated at ANNEX A to this letter. This response has been drafted by myself and circulated to all Parish Councillors for their additional comments, which have been incorporated into the attached document. The document has not yet been formally adopted at a Parish Council meeting.

Yours sincerely

(Original Signed)

PBG CUMMINGS
Parish Council Chairman

NORTH LUFFENHAM PARISH COUNCIL

OBSERVATIONS ON THE DRAFT RUTLAND LOCAL PLAN 2016 – 2036

INTRODUCTION

1. The proposed draft local plan has little direct impact upon the village of North Luffenham. Of far greater importance is the potential development of the St George's Barracks site, proposals for which we understand will be encapsulated in an additional document at a later point. The significance of this development is huge and clearly has the potential to dwarf many of the planning considerations and proposals contained within the draft local plan. We look forward to working with RCC, MoD and Edith Weston Parish Council as a significant stake-holder in this project.

IMPACT UPON NEIGHBOURHOOD PLANS - STRUCTURE / CONTENT

2. The structure of the proposed plan includes a host of Policy Statements (RLP), not all of which will accord with local views and wishes. As a result in the future it will be very difficult to write a meaningful neighbourhood plans. The plethora of Planning Policies within the document impacts directly upon HMG's intent that Local Plans should embrace the spirit of localism, rather than the imposition of policy direction from the County Council. **The primacy of the policies contained within the Rutland Local Plan over neighbourhood plans, will inevitably create planning conflict in the future.**

3. NLPC do not at present have a neighbourhood plan, however the failure of RCC to embrace current local neighbourhood plans, in the writing of this document, as experienced by Uppingham and other Town and Parish Councils, would appear to make the whole concept of neighbourhood planning void.

CHAPTER 2 – SPATIAL PORTRAIT

4. **Economy and Infrastructure.** Para 2.18 indicates that 60% of Rutland residents, who travel to work, go outside the county to work. Within an isolated village such as North Luffenham, this creates a 'dormitory village', which impacts significantly upon village life. A recent survey conducted in the village shows that 90% of those that travel to work travel by car. **For the future it is absolutely essential that further appropriate local sites for employment be identified within the plan.**

5. **Environment.** Within this village there are a substantial number of buildings listed of historic and architectural interest, which impacts heavily

upon the environmental quality of the landscape. Though not directly a local plan issue, **the lack of adequate provision for a dedicated conservation officer within the County, will over time have an impact on these buildings and our architectural heritage.**

CHAPTER 3 – VISION AND OBJECTIVES

6. **Vision.** Whilst the plan identifies the importance of rural communities having the choice to live, work and play close to where they live, little is proposed to ensure that smaller villages can access work and leisure facilities close to their communities. As one villager has put it “the only way to get an egg or milk in North Luffenham is get in your car and travel”. There is little evidence within the plan that Strategic Objective 3, that smaller villages maintain and improve their vitality and viability, can be achieved. **To be vital and viable, smaller villages do need improved public transport (SO9), high quality communication infrastructure (Fibre Broadband and mobile phone coverage), employment (SO7), additional low cost housing and an investment in sports and leisure facilities.** There is little in the plan that will ensure that this is achieved.

7. **Age Profile.** Para 3.9 identifies an intent to create a more balanced age profile in the County. A recent survey suggests that in this village only 10% of residents are aged between 16 and 36, whilst over 60% are aged over 55 years. Rising house prices and an inability to find smaller homes to downsize to, suggests this is unlikely to change without developing concrete proposals to enable younger people to stay in village communities. Again, this means investment in local employment opportunities, better public transport, more low cost homes and an increase in the number of smaller homes. **Though not included in the plan, other than windfall developments, some further building of smaller homes is needed to sustain the village for the future.** Our beautiful villages attract ‘trophy home’ buyers and builders wanting ever-larger homes and this must be better managed in the future.

CHAPTER 4 – SPATIAL STRATEGY AND LOCATION OF DEVELOPMENT

8. **The Settlement Hierarchy.** The hierarchy proposed is easily understood, however in terms of sustainable development it could be considered to be flawed. RLP 3 states that “With the Smaller Service Centres (which includes North Luffenham, future development would involve smaller scale development mainly limited to infill on previously developed land, conversion and re-use of existing buildings with very limited further development of a scale appropriate to the character and needs of the village concerned”. Without development and growth, the smaller service centres will inevitably stagnate. There is scope in North Luffenham for some growth over the next 20 years, which might attract business (including a village shop) and also some smaller low cost homes (as proposed in RLP6 1)) to meet the housing needs of the younger residents. A recent survey indicated that 60% of respondents supported the provision of more housing in the village and at least 10% of these should be affordable homes. A further development of the

size of the Rosewood estate could be beneficial in the longer term.
Consideration should be given to set an appropriate level of growth for each settlement, allowing the community to decide on the most appropriate sites.

9. Para 4.35/4.36 Infill. There is limited potential for infill development in North Luffenham, however **the opportunity to approve infill where appropriate is welcomed.**

CHAPTER 5 - CREATING SUSTAINABLE COMMUNITIES.

10. **RLP 10 – Delivering socially inclusive communities. RLP 10 is welcomed** and provides very clear guidance on what should be retained, **however similar support is needed for the provision of facilities where they have already been lost or do not currently exist.** The increasing provision of Community Infrastructure Levy (CIL) funding available to Oakham and Uppingham will mean an ever-growing inequality between facilities available in the towns and facilities available in the more isolated communities.

11. **Socially Inclusive Communities.** Para 5.2 notes that “providing easy local access to community, education, leisure and cultural facilities is important in terms of supporting sustainable settlements and communities” **Without investment in public transport for the villages of Rutland this is simply not achievable. The investment in Oakham and Uppingham creates an ever-increasing divide between the communities.** This is apparent in the significant number of village residents, especially older residents, now looking to relocate to the larger towns where Doctors, Shops, Post Offices, Care Services, Cinema/Theatre etc are located.

12. **RLP12 – Sites for residential development.** The concentration of almost all development in Oakham and Uppingham is understood, however there is concern that not all of these proposals match the aspirations identified in the relevant neighbourhood plans. Though not currently an issue for North Luffenham, who have yet to write a neighbourhood plan, **there is concern that to overrule neighbourhood plan proposals damages the whole concept of localism.**

13. **Affordable Housing.** The proposals for the enforcement of affordable housing supply in RLP16 and RLP17 is supported. **However this reinforces the need previously identified by NLPCC for RCC to ensure that Housing Associations managing shared ownership affordable homes, act in a totally transparent way in the on-going allocation process, to ensure that such properties are made available in perpetuity to local people in housing need.**

CHAPTER 6 – EMPLOYMENT AND ECONOMIC DEVELOPMENT

14. **Policy RLP32 – High Speed Broadband.** The proposals made in RLP 32 regarding the need over the next 20 years to provide Fixed Fibre

Broadband to the Premises (FTTP) are considered inadequate. Fibre to the Cabinet (FTTC) technology has been vital to the villages, **however over the next 20 years we would hope that FTTP will become the norm.** Communication is especially important in the smaller villages where substantial numbers are 'home-workers'. (In a recent survey 10% of respondents indicated that they ran a business in the Village). Linked to High Speed Broadband is mobile phone coverage. **At present 80% of the village report inadequate mobile phone coverage irrespective of the provider.**

CHAPTER 7 – SUSTAINING OUR ENVIRONMENT

15. **RLP40 and 41 – Historic and Cultural Environment/Protecting heritage assets . Whilst RLPs 40 and 41 are fully supported, it is essential that RCC invest in an appropriate level of expertise (Conservation Officer) necessary to deliver the requisite service.**

APPENIX 6 – AREAS OF BIODIVERSITY AND EODIVERSITY IMPORTANCE

16. **The following areas should be considered as 'Areas of Local Importance 'in North Luffenham:**

Village Walkway – SK933038

The Oval Recreation Ground– SK 936036 (Trees)

SUMMARY OF POINTS

In sum NLPCC would wish to draw the attention of RCC to the following points:

- a. The primacy of the policies contained within the Rutland Local Plan over neighbourhood plans, will inevitably create planning conflict in the future.
- b. For the future, it is absolutely essential that further appropriate local sites for employment be identified within the plan.
- c. To be vital and viable, smaller villages do need improved public transport (SO9), high quality communication infrastructure (Fibre Broadband and mobile phone coverage), employment (SO7), additional low cost housing and an investment in sports and leisure facilities.
- d. The lack of adequate provision for a dedicated conservation officer within the County, will over time have an impact on our listed buildings and our architectural heritage.
- e. Though not included in the plan, other than windfall developments, some further building of smaller homes is needed to sustain the village for the future.
- f. Consideration should be given to set an appropriate level of growth for each settlement, allowing the community to decide on the most appropriate sites.
- g. The opportunity to approve infill where appropriate is welcomed.
- h. RLP10 – Socially inclusive communities - is welcomed and provides very clear guidance on what should be retained, however similar support is needed for the provision of facilities where they have already been lost or do not currently exist.
- i. Without investment in public transport for the villages of Rutland access to facilities is simply not achievable for many. The investment in Oakham and Uppingham creates an ever-increasing divide between the communities.
- j. There is concern that to overrule neighbourhood plan proposals damages the whole concept of localism.
- k. As identified by NLPC, to ensure that shared ownership properties are made available in perpetuity to local people in housing need, RCC must ensure that Housing Associations managing shared ownership affordable homes, act in a totally transparent way in the on-going allocation process.

- l. Over the next 20 years we would hope that Fibre to the Premises (FTTP) will become the norm in broadband provision.
- m. At present 80% of the village report inadequate mobile phone coverage irrespective of the provider.
- n. The following areas should be considered as 'Areas of Local Importance' in North Luffenham:
- Village Walkway – SK933038
 - The Oval – SK 936036 (Trees)