Guide to the Local Plan Review consultation process, issued by North Luffenham Parish Council September 2020



...North Luffenham Parish Council has put in an application to build 50 houses on The Oval. When consulted over 95% of you objected – but that's tough, as we're going to do it anyway.

No, we made that up! NLPC has no intention of such a desecration, but remind you of anything? Rutland County Council held so-called focus consultations on the proposals for St, George's Barracks and had more than 1500 responses, of which 95% were against the scale of development. Their response; 'No comment, we plan to do it anyway."

We are now at a critical stage in the St George's Barracks story. RCC's desire to build a 'garden village' of 2,300 homes alongside a large quarry over the next 20 years after the MoD move out has been written into the proposed latest version of the Local

CLÖCK 8 TICKING

Plan, which is currently out for consultation. Once SGB is in the Local Plan, it is more or less cast in stone and will go ahead regardless RCC has given us the statutory six weeks in which to express our views. The clock is ticking....the deadline is Friday 9 October. When RCC has submitted its decision to Whitehall, a government inspector will then examine it and call comments forward. This is likely to happen in the early part of 2021.

Your Parish Council, along with a number of neighbouring councils, intends to submit a detailed reasoned response on behalf of our community. But we are also encouraging you to consider making your own individual representation, because when the inspector calls, the volume of responses could carry useful weight.

What is the Local Plan?

Put simply, it is the planning authority's strategic blueprint for a given period of time (in our case, up to 2036). It gives developers a clear idea of what they should be allowed to apply for. (North Luffenham's own Neighbourhood Plan, which the parish council is currently working on, must also take into account the requirements of the Local Plan).

In this phase of the consultation, what we can challenge is complex and strictly limited. On the next page, we'll explain the ins and outs.

What can we challenge?

This formal public consultation is the last chance to have your say on the proposed Local Plan – BUT... feedback is invited on only two matters:

- Is the Local Plan sound?
- ▶ Is it legally compliant?

To be considered sound, it must pass four tests:

- Has it been positively prepared?
- ▶ Is it iustified?
- ▶ Is it effective and deliverable
- Does it comply with national policy?

Legal compliance covers issues like sustainability, community involvement and the duty to co-operate with neighbouring authorities.

Within these parameters, the local parishes, including North Luffenham Parish Council, have taken expert advice on how to question the soundness of the Local Plan and have identified a number of areas to challenge. For example:

On consultation: The initial St George's Barracks consultation process was deeply flawed and the outcome pre-determined. An essential element of the National Policy Planning Framework is that there should be community endorsement. The local response was that 95% of people were against the scale of the development.

On housing: The plan to build a community of 2,300 homes at SGB provides far more houses than the previously calculated Objectively Assessed Housing Need.

On employment: the estimated percentage of home workers in the SGB community is unrealistic given that figures show that at least 60% of Rutland work-

ers travel to work outside the county. We believe this makes the employment proposals unsustainable.

On infrastructure: £15m of the £29.4m Housing Infrastructure Fund that RCC is likely to apply for has been allocated by the MoD for cleaning up the site. The remainder is woefully inadequate for the huge infrastructure projects the development would require.

On co-operating with neighbours: RCC has 'gifted' 650 of its future housing allocation to

South Kesteven DC - but SKDC did not request this and does not need that many to meet its own targets. The figure represents four years worth of Rutland's housing needs and should have been included in the Local Plan.

On transport: the 2018 traffic assessment is already out of date, is lacking in detail and significantly underestimates the number of car journeys. Also, the plan appears to make no attempt to meet the sustainable public transport requirements of the National Policy Planning Framework. What's more, North Luffenham's own survey of transport showed that more than 90% of residents relied on a car.

On spatial strategy: in the previous version of the Local Plan, the strategy

allowed for a pattern of development dispersed across the county. The new version expects SGB to bear the brunt of development, potentially a deterrent to development where it might be required elsewhere. We are questioning whether RCC realistically considered the other reasonable alternatives – or just went along with the MoD's intentions. There is more about this on the opposite page.





The spatial strategy governs the appropriate locations for development. We believe the proposed Local Plan has got it wrong...

The local parishes have studied the spatial strategy in some detail. They have concluded that RCC has failed in its resonsibility to properly consider the range of reasonable alternatives.

The 2017 version of the Local Plan sets out a dispersed spatial strategy - but the proposed version focuses on St George's Barracks - a change influenced not by the evidence that this would meet Rutland's identified needs but by the MoD's decision to offer the site for sale.

Sustainability had not been appraised - as it should have been under National Planning Guidelines - when RCC signed a Memorandum of Understanding with the MoD to develop SGB.

We believe that focusing development around the two towns, Uppingham and Oakham, and the villages would be more sustainable, effective and consistent with national policy. That's where homes and employment are needed, not at an isolated rural site

away from the existing main centres of population.

National policy makes it clear that significant development should be focused only where the need for travel can be limited and a genuine choice of alternatives to the private car can be offered. This is unlikely to be the case at SGB.

It's also unclear whether employers would find SGB an attractive proposition, thus undermining the aspiration of the Garden Village concept to create communities that are self-contained. There is even a risk that the development could create two flows of commuters - people travelling to and from work at SGB but living elsewhere and SGB residents travelling to and from work elsewehere.

'Self-containment' means having all necessary housing, employment and services on site. Yet at the SGB there is no secondary school proposed and the development, even if it were to include the full 2,200 homes proposed, is not of sufficient scale to cater for one.

There is also continuing uncertainty about whether a GP surgery would be provided there. If it were, would it just displace one elsewhere in this part of the county? The Infrastructure Delivery Plan for SGB is not clear on this. We think this is a further example of how various initial promises have gradually been eroded, reflecting both the uncertainty around delivery and the unsustainable location.

Because the clock is ticking, we need to act quickly...

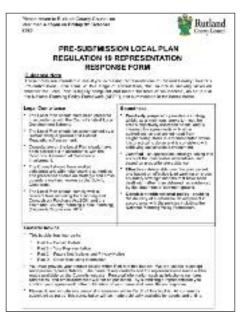
We've been through just some of the points we hope to raise at the public examination of the Local Plan by the government-appointed inspector.

You may wish to comment on some of them, in your own words. However, Rutland Councty Council's response form (right) requires you to respond in a specific way.

You must limit yourself to the points listed on the previous page - and you must make it clear which policy point you are challenging.

The Local Plan document itself is 300 pages long with 100 pages of technical appendices. You can make an appointment to view it at the RCC's offices. North Luffenham Parish Council has a single copy - call Tim Smith on 01780 360083 to request a viewing or to request further help or guidance on making a representation.

All the information on the Local Plan Review can be found on RCC's website. Go to: rutland.gov.uk and under the Popular Pages menu, click on Local Plan Review. If you scroll down the opening page you fill find a button for the Online consultation response form (complete with spelling mistake in the heading!). You can also download it to print out a paper copy. You may know of someone who does not have



internet access who would appreciate this.

After entering your details, you are then expected to enter which part of the Local Plan your representation is about. The process is designed to make it easier for the inspector at the public examination to cover all the issues raised.

If you do not wish to fill in RCC's form but are keen to participate in the consultation, the Parish Council will welcome your views to incorporate into its own representation.

The Fight4Rutland campaign

The Fight4Rutland campaign is a campaign group of Rutlanders "dedicated to achieving a truly sustainable future for Rutland".

F4R believe that development should continue throughout the county but they back the idea of a new village of only 350 houses at St George's Barracks.

The excellent F4R website (fight4rutland.org) tells you more about how they are going about this.

