

Issue 2: Determining the appropriate level of housing growth

Strategic Objective 2: Delivering sustainable development by determining an appropriate level and location of growth in Rutland, sited in locations where people can access jobs and services, and in delivering wider social and economic outcomes, taking account of environmental considerations.

Rep			
ID	Respondent	Agent	15 Do you have any alternative suggestions for the location of housing growth in Rutland?
			Greenfield development should be absolutely bannedwith further houses come more people – but
	Randal Vaughan		where are the doctors, dentists, teachers ?? There are ample brownfield sites, neglected, decaying and
4284	[154]		the buildings on them should be the primary targets of demolition and replacement.
			We believe that development in Rutland is proposed as part of a sustainable urban extension to Stamford
			should this count towards Rutland's housing needs and so reduce the requirement for new housing
			elsewhere in Rutland. However we would note that meeting allocation in this way should not remove
	Ketton and Tinwell		focus from the effects of a major urban sprawl on the very edges of the county, which will have impacts in
	Joint Neighbourhood		various ways, for instance traffic flows, on the county's rural and village nature.
	Plan Steering Group		We do not believe that it is correct to include option E within question 13. This is a very major topic, and
	(Neighbourhood Plan		cannot be adequately considered unless consultees are informed where the community or communities
	Group		would be located and what size they would be. If this question is to be considered, then it needs to be
	Representative)		looked at in its own right, and we need to understand (inter alia) to what extent such new communities
4242	[196]		would remove the burden of housing provision from the rest of the county.
	Natural England		Natural England does not have a particular preference for the housing growth scenarios that have been set
	(Roslyn Deeming,		out but would wish to ensure that the chosen approach results in no adverse impact on any designated
	Senior Planning		nature conservation sites. We would also advise that housing development should avoid Best & Most
4232	Adviser) [236]		Versatile Land (BMV) where possible.
4230			We note that new sites for housing, employment, mineral and waste or any other developments have not
			yet been identified. Sites which are suggested for development will be assessed later in the plan making
			process. The most suitable sites will be included as 'preferred allocations' in the next consultation
	National Highways		document, expected to be published in 2023.
	(Mrs Catherine		Regarding the development of additional sustainable communities, we wish to understand if the site at St.
	Townend, Spatial		George's Barracks, Woolfox Garden Village, previously determined to not be deliverable, or any other new
	Planner) [1063]		communities will be taken forward in the new Local Plan.



4206	The Society of Merchant Venturers [693]	Savills (Lynette Swinburne, Associate Director) [520]	The proposed spatial strategy, as set out in the Sustainability of Settlements Assessment Update (November 2019), identifies Egleton as a 'Smaller Village'. It is important for housing delivery to have an adequate supply of housing sites, including those that are small and medium in scale, particularly in single ownership and that can be delivered quickly. The scale of small and medium sites is relative to their location. In the context of villages such as Egleton, it is considered that growth would be on sites that are less than 20 dwellings. In addition to the above, the NPPF (paragraph 79) notes that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. It is therefore important that whatever spatial strategy for housing is pursued in the emerging Local Plan, it should provide sufficient opportunities for growth at all tiers of the settlement hierarchy, including proportionate growth at villages such as Egleton. Residential development in such settlements can make a significant contribution to the maintenance and continuing provision of local services and facilities for community use.
	Leicester,		It is considered that development in Rutland is proposed as part of a sustainable urban extension to Stamford should this count towards Rutland's housing needs and so reduce the requirement for new
	Leicestershire and		housing elsewhere particularly as it is inside the geography of RCC LPA.
	Rutland ICS (Adhvait		There is a particular importance for the two neighbouring LPAs to work together to support the
4195	Sheth) [201]		discussions around the impact upon healthcare infrastructure.
4175			The Council needs to revisit and update its evidence base. The majority of the I&O Supporting documents have not been updated, and still dated 2019.
			The SA Scoping Report is dated March 2022 – but does not refer correctly to the I&O – it is based on a Plan period to only 2036.
			The baseline studies (referred to in the SA Scoping) need to be revisited in the context of the NEW Local
			Plan and the extended Plan period (2041) – at present it fails to do this – and will result in a(nother) failed
		Barton	Local Plan.
		Willmore,	The Council should use the Future Vision of Rutland to provide min 190 dpa.
		now Stantec	Contrary to the Issues and options document: "It is intended now that any development on the Rutland
		(Seth Tyler,	part of a comprehensive Sustainable Urban Extension to Stamford should count towards Rutland's housing
		Graduate	needs and so reduce the requirement for new housing elsewhere in Rutland." (pg. 26). Any Urban
	De Merke Estates	Planner)	extension at Stamford should not result in consequent reduction of actually meeting Rutland's own needs.
	[589]	[1141]	Due to the infrastructure required and Stamford being Located in South Kesteven and the service in this



		authority will be used more than Rutland CC.
		Oakham/Barleythorpe is the principal County Town, and should remain main focus to meet the majority of
		Rutland's Supply of Homes.
		Small proportion of homes from Stamford should meet the needs of the wider HMA.
		Proportional (less) growth to smaller villages.
4154		It is vital that any new housing development should have immediate access to the full range of
		infrastructure facilities, including transport. When the St Georges Barracks development was live, the idea
		of reopening the rail station at Luffenham was mooted. If this proposal could be taken forward, I suggest
		there could be a case for creation of a new community around this station – i.e. in the land between North
	John Meara [776]	and South Luffenham.
4140		We suggest the preferred approach to growth to be followed is Option C. Clearly a greater level of
		provision could increase pressure on local infrastructure but coalescing development in a single location
		will provide the Council with opportunity to coordinate, fund and deliver the necessary infrastructure to
		meet identified local needs.
		As is illustrated above the Council already performs poorly in respect of deprivation in the context of
		housing and access to services domain. We consider a dispersed approach to development would
		exacerbate this issue unless development is of a scale that makes a significant contribution to enhancing existing infrastructure and access to local services and facilities.
		Uppingham is the second largest sustainable settlement in the County and provides access to a range of
		services and facilities. Moreover public transport provision and access to active travel options will be
		higher in Uppingham than smaller settlements within the County. Concentrating development in and
		around Uppingham would provide the best opportunity for the Council to tackle the climate crisis and
		reducing energy use by providing access to services and facilities and supporting transport choice. In
		contrast a more dispersed approach to development would clearly increase car dependency and will
		reinforce existing issues related to access to services.
		If the Council is serious about tackling climate change and improving access to services and facilities then
		growth should be allocated at Uppingham.
		The development on the edge of Stamford will not address local housing needs for the county of Rutland,
		which the Local Plan Review is seeking as a priority. Any future residents may, as a matter of fact, live in
		the County but they will clearly look towards Stamford and access employment and facilities in that town
	Silver Fox	given its proximity and relationship. In this context, whilst claiming housing delivered as an urban
	Developments (John	extension would help the Council meet its numerical housing requirement, ironically it will not address
	Edmond) [1138]	local housing needs and will in effect reduce housing delivery in locations where there is a genuine



			affordable and housing need which should be met, like Uppingham. Accordingly, we oppose that any proposals for housing numbers for Rutland to form part of the sustainable urban extension for Stamford; put shortly, it should not count towards meeting Rutland's housing needs. It would clearly reduce housing delivery targeted at Uppingham and would deliver homes in a location where there is no obvious housing need in Rutland. In addition, the approach of a sustainable urban extension at Stamford would Indeed, hinder the aim of sustaining services, facilities and employment opportunities in Rutland generally and Uppingham in particular, thereby undermining the delivery of economic development and investment into the County.
4124			Our preferred approach to growth in Q13 is Option B. Clearly a greater level of provision could increase pressure on local infrastructure but coalescing development in a single location will provide the Council with opportunity to coordinate, fund and deliver the necessary infrastructure to meet identified local needs. Oakham is the largest and most sustainable settlement in the County and provides access to a range and services facilities. Moreover public transport provision and access to active travel options will be higher within this settlement than smaller settlements in the County. Concentrating development in and around Oakham would provide the best opportunity for the Council to tackle the climate crisis and reducing energy use by providing access to services and facilities and supporting transport choice. In contrast a more dispersed approach to development would clearly increase car dependency and will reinforce existing issues related to access to services. This is not to say that no growth should be apportioned to smaller settlements. There will be a need for some market and affordable need in smaller settlements and where the evidence is available to justify some growth then this should directed to lower tier settlements. However if the Council is serious about tackling climate change and improving access to services and facilities then growth should be tilted further towards Oakham. We do not consider that the creation of a new settlement can provide a sustainable solution to meeting the County's growth needs. Clearly the County is relatively small and its housing and employment needs reflect this. The low levels of growth proposed would not, in our view, provide the critical mass needed to deliver a new sustainable community, except over the very long term.
			The Council sought to rely on a new sustainable community at St Georges Barracks in the withdrawn Local Plan 2018-2036 and the failure to achieve suitable funding was the principle reason the plan had to be abandoned. Simply following the same approach again is not considered a reasonable approach.
		Mr Alasdair	We are aware that there is potential to deliver new homes within the administrative area of Rutland but as
	Avant Homes [1131]	Thorne [562]	part of an Urban Extension to Stamford. We would point out that the proposed Quarry Farm site which



			forms part of the Stamford North development is not well related to any of the County's main towns and hence communities who live in Rutland. The main towns of Oakham and Uppingham being a 20-25 minute car journey or in excess of a 4 hour walk. Clearly development on the edge of Stamford is sustainable and will deliver a sustainable community. However, this site will not address local housing needs for Rutland. In short, we do not consider that this site should count towards meeting Rutland's housing needs. It would clearly reduce housing delivery targeted at the main towns of Oakham and Uppingham and would deliver homes in a location where there is no obvious housing need in Rutland.
4114		Andrew Granger &	We contend that the identification of a new settlement would be consistent with Paragraph 73 of the Framework (Adopted July 2021), consequently, we are promoting Woolfox as a potential new sub-regional community, which can assist in meeting the development needs of the Housing Market Area. In respect of Woolfox's deliverability credentials, the supporting documentation, prepared on behalf of the Landowner Clients in response to the previously completed Rutland Local Plan 2018-2036 Regulation 19 Consultation and included within this submission, sets out detailed evidence regarding the realism, viability and deliverability of the proposal. We would direct the Council's attention to this supporting documentation rather than repeating this evidence in full within this Statement. Woolfox represents a realistic, viable and deliverable opportunity to allocate a new settlement to meet the identified uplift in development needs within the District, and the wider sub-region. We have concerns about the capacity of Stamford to accommodate additional development beyond the identified housing allocation. Thus, it is our view that the allocation of any additional sites within the Market Towns would result in significant adverse impacts in respect of landscape and heritage value and, therefore, would not be appropriate. Notwithstanding the lack of availability of suitable sites, as identified above, it is acknowledged that there is already significant planned growth within the Market Towns through the allocation of major urban extensions. Therefore, it would be questionable as to whether the market would be capable of supporting any increased housing delivery within these areas, during the plan period to 2041, or whether market saturation would result in the delivery of additional allocations being pushed back beyond the end of the plan period.
	MR PJSR HILL AND PIKERACE LIMITED [1130]	Co (Stephen Mair, Planning Consultant) [483]	Consequently, it is our view that the allocation of any additional sites at Stamford, beyond those carried forward from the adopted Local Plan, would result in significant adverse impacts in respect of landscape and heritage value and may not be capable of being appropriately sustained by the market capacity during the plan period. Therefore, we contend that the Local Plan should pursue an amended strategy, which includes the identified of a new settlement.



			Within this context, we propose the allocation of Woolfox as a sub-regional new settlement that would complement the current spatial strategy identified by the Council. The site has been assessed as being viable and deliverable and, therefore, is capable of providing a longerterm development option which would meet the current and future development needs of the District and the wider housing market area.
4100	Wells McFarlane	Pegasus group (Mrs Georgina	Issue 2b shows the current adopted spatial distribution of housing as contained in the adopted Core Strategy and applies the same pattern of distribution to the minimum requirement of 3,080 dwellings using the LHN. Oakham is identified as the Main Town providing for the majority of homes. The identification of Oakham as the most sustainable settlement in the County is supported and reflects its role as the main urban centre with a wide range of key services and facilities and employment opportunities along with good public transport connectivity to major centres by rail. The development to the south west of Oakham would support the development strategy of locating development close the main town of Oakham. It would be well located to access existing service and facilities in Oakham. The proximity of the site to Oakham Town Centre means that it would be highly sustainable location for residential development. A full range of day-to-day service and facilities, education and employment are all within easy walking and cycling distance. If development in Rutland is proposed as part of a sustainable urban extension to Stamford, this would support the growth of Stamford and therefore would contribute to South Kesteven's housing need and
4046	[365]	Doyle) [575]	would not therefore contribute to meeting the housing requirement for Rutland. The consultation document shows housing completions in the context of the current adopted spatial
		Pegasus	distribution of housing which directs 70% of housing to the main towns, 20% to the Local Service Centres, such as Ketton and 10% to other village. It highlights that only 13% of homes have been delivered in the Local Service Centres and 60% in the main towns. The consultation document goes on to apply the minimum local housing need figure of 140 dwellings, with a 10% buffer, to the current distribution strategy to show what a continuation of this pattern of development would translate into. It is essential that the Council does not use 140 dwellings as the minimum figure, the local housing need figure for Rutland is 142 dwelling a year and with a 10% buffer this is 3,124 homes not 3,080 as suggested in the consultation document. Local Service Centres, such as Ketton, are identified as the second most sustainable location for growth
	Vistry Group c/o Pegasus Group (Jonathan Porter, Strategic Planning Manager) [1129]	group (Mrs Clare Clarke, Associate Planner) [523]	outside the main towns and this is supported. A settlement survey is to be undertaken to reassess the service levels in villages and our clients look forward to the opportunity to comment on the methodology for this. It is anticipated this will continue to identify Ketton as a sustainable location due to the current level of service and facilities available in the village including a Post Office and Village Store, Primary School, Community Hall, Public House, sports facilities and a regular bus service.



			Development on land off Bartles Hollow and Park Road in Ketton would be consistent with locating development in the most sustainable locations and as such is likely to be compatible with all the proposed strategies, as whilst development may be focused in one or more settlements, there will still need to be a variety of sites in a variety of locations to ensure the plan is deliverable. It is also the case that all the strategies will need to be supported by improvements to infrastructure, which will be achieved through the Community Infrastructure Levy.
4038			As the Local Plan Review seeks locations which are the most sustainable settlements in the area, Stamford, Oakham and Uppingham, due to the wide range of employment opportunities, services etc. available in those towns. Stamford Town Council and its constituents, therefore, will have either interests or concerns regarding future RCC planning developments which abut the Town's borders. RCC and Stamford North development. This is of great importance to the people of Stamford, STC and SKDC because of the immense scale of this housing development and its beneficial or adverse effects in the not too distant future. RCC states in its Local Plan FAQ's that the allocation for the Stamford North
	Stamford Town Council (Mr Richard Tracey, Administration Officer) [1061]		housing development is included in the adopted Local Plan for SKDC due to the fact that any development in Rutland is 'part of a wider comprehensive urban extension to the North of Stamford would count towards South Kesteven's housing needs rather than Rutland's. The later stages of the Local Plan process will determine appropriate allocations in the County, although an outline planning application for this site has been submitted '. It is therefore imperative that we all work together during this important but contentious development of Stamford North.
4014	John Dejardin [128]		My concern is with the smaller villages, without controlling the loss of small affordable/social housing these villages become socially and communally unbalanced. They then also draw in support services such as gardeners, cleaners, child care etc. from other more distant settlements. Some growth in these villages should be permitted in order to maintain this balance and make the communities more sustainable. With the advent of electric vehicles through the 20 year plan carbon footprint will reduce rather than increase from any growth in population. The planned limit of development has severely damaged the character of many villages due to the increased density of the settlement, this needs careful consideration when reviewing settlement PLD boundaries.
3991	The Society of Merchant Venturers [693]	Savills (Julia Mountford, Planning Consultant) [735]	Q13- The proposed spatial strategy, as set out in the Sustainability of Settlements Assessment Update (November 2019), identifies Oakham as a 'main town' and the 'most sustainable location in the County'. Options A and B seek to distribute the majority of growth to Oakham. An approach based on these options is therefore broadly supported, subject to having sight of the evidence base informing the detail of the approach proposed.



		It is however apparent, as discussed in our answer to Question 11 above, that an adequate supply of housing sites, including small and medium sites, particularly in single ownership such as 'Land at Stamford Road' and 'Land at Uppingham Road' that can be delivered quickly, is required to meet and adapt to local housing needs. Such sites can also help to ensure the Council can maintain a five year housing land supply and ensure delivery across the Plan period. Any proposed urban extension to Stamford within Rutland would need to be supported by a robust evidence base in order to consider the merits of such a proposal. Notwithstanding the requirement for an evidence base, it is considered that any urban extension should not be proposed instead of small and medium sized housing sites but in addition to such sites. Given the longer leadin time for larger sites, the allocation of a diverse range of housing sites, including smaller sites that can be delivered quickly will help ensure that there is a more continuous delivery of housing across the Plan period.
		Figure 3 paragraph 3.4.16 shows a 56% distribution of new housing for Oakham and a 14% distribution to Uppingham
	Clipsham Parish	The Uppingham community appear to desire a greater proportion of total housing than is proposed. So
	Meeting (Clifford	perhaps the core strategy distribution of 70% to Oakham and Uppingham combined should be allocated
3956	Bacon) [110]	in different proportions giving a greater percentage to Uppingham and a lower percentage to Oakham.
		Locations for future growth – at this stage there is no identification within the document for a new garden
		community i.e. at St George's Barracks, which was proposed in the previous withdrawn Local Plan and was
		just a few miles from the NNC boundary. However, para 3.4.14 mentions that should a site like this come
		forward for consideration in the new Local Plan, consideration will need to be given to a range of issues on
	Namela	whether such a site would be a sustainable, viable and deliverable option for growth.
	North	If this site (or any other in a similar location) were to some forward again it is likely NNC would have
	Northamptonshire Joint Planning &	If this site (or any other in a similar location) were to come forward again it is likely NNC would have similar comments to what the North Northamptonshire Joint Planning and Delivery Unit (JPDU) made in
	Delivery Unit	response to consultations on the now withdrawn Local Plan in September 2018 and November 2020; i.e.
	(Samuel Humphries)	ensuring robust transport modelling in the surrounding area/at the NN boundary takes place and other
3940	[244]	potential cross boundary impacts, particularly in relation to infrastructure, are considered.
	Anglian Water (Darl	
	Sweetland, Spatial	Question 14. Headroom and future WRC permit changes would need to be assessed alongside existing
	Planning Manager)	planned growth at Stamford to consider the size that a Sustainable Urban Extension at Stamford could be
3921	[234]	without requiring the construction of additional capacity.



	South Kesteven District Council (Shaza Brannon, Principal Planning	South Kesteven District Council is particularly interested in any proposed growth in Rutland towards South Kesteven district. Stamford is the second largest market town in South Kesteven and has a range of facilities including a retail, supermarkets, and a hospital, as well as transport networks. Stamford also provides the role as a main service center to surrounding villages in South Kesteven and Rutland. The adopted South Kesteven Local Plan's strategy for Stamford sets out its focus on growth to the north of the town to ensure the historically significant and sensitive landscape to the south of the town is protected. The South Kesteven adopted Local Plan (2011-2036) allocated development at the Stamford North Sustainable Urban Extension which includes delivery of an indicative figure 1,300 homes, with an additional 650 homes to be provided at Quarry Farm, Rutland (Monarch Park). Whilst the Council supports reference to development on the South Kesteven/Rutland administrative boundary, the Council is disappointed that Rutland County Council considers that development on the Rutland element of any urban extension to Stamford should count towards Rutland's housing needs. As such, South Kesteven Council disagrees with Question 14, and considers that the 650 homes should remain within the Council's housing land supply, as agreed. South Kesteven District Council expects any sustainable urban extension to Stamford to fully consider the infrastructure requirements of Stamford given that the future residents would naturally look to Stamford for schools, doctors, shops and other services and facilities. South Kesteven Council will continue to work positively with Rutland County Council, under our duty to cooperate. Please keep South Kesteven District Council updated on progress with the Local Plan and any other future policy consultations. South Kesteven is currently reviewing its Local Plan and will continue to
3913	Policy Officer) [1126]	liaise with Rutland County Council on cross boundary issues.
3889	House Builders Federation (Joanne Harding, Planning Manager – Local Plan (North)) [1125]	13. The HBF considers that the most appropriate spatial strategy for new housing development is one that sees the spatial distribution of sites follows a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.
3830	Sally Renner [1124]	Build where the existing infrastructure would best support development
	Historic England	Q13- Historic England have no particular comment at this stage, heritage assets and their settings should be taken into account at all stages. For option B, Historic England would highlight the importance of designated and non-designated heritage in Oakham, and the development of the town as seen in the archaeological remains as well as settlement pattern, layout, spaces etc. Consideration should be given to
3761	(Emilie Carr) [219]	the impacts of development upon the church, Castle and other heritage assets and remains of the ditch



			dividing the Dean of Westminster's land from the post conquest Royal manor (please see HER) and the
			relationship of the castle and market place to possible preconquest Royal Estate Centre and the Late Saxon Town.
			Will RAF Luffenham be reconsidered? If it is, please see our previous advice.
			Q14- Again at this stage, without detail plans, Historic England have no specific comment but would wish
			to re-iterate previous comments and engagement regarding the Quarry Farm site and the importance of
			the historic landscape setting of the Great Casterton Roman settlement scheduled monument (and other
			assets) in the area to the north of Stamford. Which areas are being considered? Heritage assets and their
			settings would require careful consideration at all stages. If Tinwell is being considered for example, the
			importance of the separation of the historic settlement of Tinwell from Stamford is stressed.
			It is good to see that the 650 homes planned in Rutland near Great Casterton are now going to be counted
			towards Rutland's five year housing supply. This should reduce the need for large scale additional
			housing/land supply in a small, rural county, where current development does not appear to be sustainable.
			Garden villages with appropriate infrastructure and employment opportunities are mentioned. If the scale
			of development is realistic for Rutland, these should be prioritised as a way forward for large brownfield
			sites eg St George's and Woolfox. However, developers prefer greenfield sites, as they are usually cheaper
			to develop than brownfield – may be brownfield incentives should be considered, or greenfield
			disincentives
			Not permitting development outside the planned limits of development and on greenfield sites is touched
			upon. In Rutland this should certainly be a red line for large scale developments (over 10 houses) in order
			to preserve the landscape, amenity and character of the county
			There needs to be clear recognition that as a small, rural county, Rutland does not have the capacity, nor
			infrastructure, to support unlimited housing development. This should be stated in the Local Plan. The
3752	Jane Ellis [1121]		focus should be on meeting local housing needs with affordable and rentable housing
			There will inevitably be a need to consider the capacity of sites and how this marries with the percentage
			spilt across the hierarchy. However, we consider the first step should be to look to assess the sites in
			Oakham, identify a more specific capacity for each, before specifying the level of development sought at
		Districtly (1.4	each subsequent level of the hierarchy.
		Bidwells (Mr	To this end, we would reiterate the points made in our call for sites submission that the Taylor Wimpey
	To don Minor ou	Mark Harris,	site south of Brooke Road is suitable and available for development. The previous assessment work of the
2740	Taylor Wimpey	Partner)	Council, which concluded that the site was unsuitable based on highway impacts, is entirely unjustified
3749	Straetgic Land [660]	[659]	and cannot be used as a reason to rule the site out of the development strategy. The Transport Note



		submitted with the call for sites submission sets out why this position cannot be substantiated, outlining how any impacts on the highway can be mitigated and indeed how development can help improve highway safety locally. The Brooke Road site could deliver c.180 dwellings or just 9% of the total additional requirement for Oakham. Whilst we are aware that some of the requirement may be absorbed by the recent approval of speculative applications in the town (it is unclear if they are in the commitments) this shows the extent of the challenge of meeting the growth requirements of the area. It is likely that there will need to be several medium/large allocations made around the town and the Brooke Road site, which has the added advantage of having additional land for open space and biodiversity net gain provision, should be considered as one of the most appropriate sites for development in the town given the site's lack of constraints. Additionally, to its suitability and ability to deliver additional benefits, the site is also in a favourable position due to begin in a single landownership and under the control of a housebuilder who is able to deliver homes on site without delay. It is important to note when considering development around Oakham that Barleythorpe is considered as a separate settlement. This has always been recognised in the work of the Council and there is no justification for changing this position now. Therefore, and growth around Oakham should be based on the assumption that it will need to protect the integrity of Barleythorpe as a separate settlement and any growth in the vicinity should be appropriate in scale to its role and function as an 'other village'.
3734	Sinclair Rogers [1120]	Issue 2: the lack of a local plan has not permitted Ketton to play any part in 'determining the appropriate level and development of growth'.
3724		On this basis, we would reject Option E as being both unsustainable, and also as going against statements already made by the Council in its own consultation document. As for the other options, we consider that perpetuating the Core Strategy apportionment would only be a valid option if the Council were to allocate deliverable and available sites in such a way that this can be achieved. The performance outlined at paragraph 3.4.10 suggests that this has not been the case to datewith a poor record of delivery from allocated sites, and an excessive level of delivery from windfall provisions. Therefore, if Option A is to be selected, it must be clearly supported by sufficient allocation sites, with a sufficient buffer of identified sites, to make clear that the Plan is deliverable, and moreover that the emphasis is clearly in favour of allocated sites, with a much smaller provision being given over to windfall sites. The windfall provision must then be set against clear and rigorous criteria (though still deliverable)
	Tim Allen [521]	such that the Council can manage the actual levels that come forward in practice.



		Options B, C and D can all be argued to have some merits - although we cannot see much differentiation between Options B and C - there is no justification given as to why either Oakham or Uppingham should be preferred. We consider that a blended approach should be taken, with clear allocations made in respect of growth in Oakham, Uppingham and in the Local Service Centres. This should be defined, but could be done with ranges of possibility, reflecting the way that sites would be allocated and including a buffer for each potential location. Such a flexible approach would provide an incentive to developers and promoters to bring forward their sites, and so maintain a current and implemented Local Plan that achieves both its Housing Delivery Targets and maintains a 5 year supply. We envisage a strategy that could allocate 40 - 60% of the growth in Oakham, 20 - 30% in Uppingham, 20 - 30% in the LSC's and, say, no more than 10% in windfall sites. Both allocated and possible buffer sites would show how the upper and lower ranges could be achieved, and promoters would be free to bring sites forward as they wished, but would run the risk that the Plan requirement had bene met if they were to delay. However, we would also comment that we do not see that all of the Local Service Centres are the same. The previous draft Plan made clear that some of the LSC's were both better connected, and had a greater range of facilities than others, but this was not carried forward into the growth strategy or into the allocations that were made. Whichever Option is chosen - or if a blended approach is developed, as we have suggested, we consider that more work should be done in respect of the LSC's, to ensure that those that are better connected, and with a greater range of facilities, are targeted for a greater proportion of development, or, at least, have a clearer degree of policy support than those that are less well catered for.
3693	Severn Trent (Chris	Whilst Severn Trent provide potable water to the majority of Rutland, this forms part of a single water supply network, localised improvements may be required, but it is unlikely that the spatial strategy will have a significant impact on the viability of water provision, it is however important that all development incorporates Water efficiency to combat the impacts of climate change and water scarcity. However, we only provide sewerage services to a small proportion of the county. It is therefore important that the views of Anglian Water are considered in relation to the spatial strategy for Rutland. The wider the spread of development there is likely to be a reduced scale of network improvement, but widespread, making it complicated to programme any necessary improvement works, whilst locating more growth in a couple of locations will result in a greater need and scale to deliver capacity improvements,
	Bramley) [230]	however these can sometimes be easier to programme and deliver.



		Again, housing should reflect employment. New sites, such as St George's Barracks, and the A1 Woolfox
	Ms Janet Taylor	area would be appropriate if they were to be mixed use and provide employment opportunities, and if
3656	[1109]	they were to have the necessary infrastructure, including upgraded road access.
	Mr John Redshaw	The plan needs to contain an element of flexibility that would allow variation through the planning period
3586	[919]	to allow for unforeseen availabilities for development.
	Barrowden Parish	Consideration should be given to developing a self contained sustainable community with schools, medical
	Council (Mr Gordon	and retail facilities of between 2000 and 3000 homes to be developed over the next 20 years or more.
	Brown, Chairman)	Where smaller sites are being considered for allocation, residents from the immediate surroundings to be
3545	[1103]	encouraged and supported to use the BIMBY Toolkit https://www.bimby.org.uk/toolkit
3506		Additional Comments to Questions 13:
		Greenlight supports Option D.
		Greenlight supports the proposed settlement hierarchy which is intended to assist with the allocation of
		appropriate levels and types of development to different settlements within Rutland. National planning
		policy seeks to direct development to the most sustainable locations which contain a variety of services
		and community facilities and where reasonable public transport services exist.
		In particular, Greenlight supports that the Council identifies Whissendine, (in the Sustainability of
		Settlements Assessment Update (2019)), as one of ten 'Local Service Centres' (LSCs).
		The Council's evidence base identifies the villages in this category, as those that have most of the 'key
		facilities' and score well in terms of either 'other services' provision or are more accessible in terms of
		frequent public transport provision or close proximity to the main settlements.
		Identifying Whissendine as an LSC is clearly justified within the Council's Sustainability of Settlements
		Assessment Update (2019). The document ranks the settlements in the hierarchy based on understanding
		of their current level of facilities and accessibility to services. The 'Settlement Hierarchy Matrix' at
		Appendix D of the document presents the settlements in order of highest to lowest according to their
		scores. The overall scores for LSCs range from 17 – 26 out of 31; with an average of 21.1. Whissendine
		scores 20; it is therefore clear that Whissendine sits comfortably within the LSC category. Greenlight
		supports this assessment and clarification for Whissendine.
		As a sidenote, the Glossary of Terms included as an Appendix miss-defines 'Local Service Centres', by
		stating they are listed in the current Local Plan's Core Strategy Policy CS3, which sets out the settlement
		hierarchy. This is incorrect as Policy CS3 is not the latest most up-to-date evidence on the settlement
	PDR Planning Limited	hierarchy, this is the Sustainability of Settlements Assessment Update (2019). The Glossary of Terms
	(Mr Philip Rawle,	should be up-dated to reflect this.
	Director) [627]	Working on the current adopted spatial distribution of housing, as contained within the adopted Core



Strategy, and applying the same pattern of distribution to the total housing requirement of 3,080, the Core Strategy provides for 70% of housing taking place in Oakham and Uppingham, and 30% taking place across the villages of Rutland (based on 20% taking place in the larger villages defined as LSCs and 10% elsewhere).

Columns 3 and 4 of the table on page 28 of the 'Issues and Options Consultation Document (June 2022)' identify that the District has experienced a total of 44 completions (April to September 2021) and has commitments of 503 as of 1st April 2021. The consultation document therefore identifies a remaining, minimum requirement for the Local Plan to be 2,533, (based on a requirement figure of 3,080 dwellings). This equates to 562 dwellings in the LSCs (based on 0 completions and 54 commitments in the LSCs). Applying the approach of 190 dwellings per annum for Rutland with the provision of a 10% buffer over a Plan period from 2021 to 2041 would equate to a total housing requirement of 4,180 dwellings. Working on the current adopted spatial distribution of housing (as per the above), this identifies a minimum requirement for the Local Plan of 3,677 dwellings, which equates to 782 dwellings in the LSCs (based on 0 completions and 54 commitments in the LSCs).

Considered crudely, the proposed, revised remaining requirement equates to c. 78 dwellings to be located at each LSC. Housing sites of this size are likely to be sufficient to support, sustain and grow LSCs the size of Whissendine.

NPPF (paragraph 79) is clear that:

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services."

To meet national policy, the Council should be allocating sites of a sufficient size in LSCs, including Whissendine, which are able to assist in sustaining and growing these important larger villages and supporting local facilities, such as schools, sports centres, and clubs. If this means a higher level of housing delivery across the County than, for example, the 3,080 figure then this is an outcome that is justifiable under the NPPF.

For example, Greenlight's sites at Melton Road/Pickwell Lane (WHI11/WHI12) offers sustainable development sites on the edge of the built-up area of Whissendine, which could deliver in the region of 70 homes, meeting the vast majority of this LSCs requirement. As explained in detail in Greenlight's submission to the new Rutland Local Plan – Call for Sites (June 2022), this land parcel offers suitable, available, and achievable sites, which can be brought forward for development quickly. Additional Comments to Questions 14:

Greenlight does not agree with this approach.



	Mrs Pam Allen		Firstly, there is currently no policy basis for the allocation of development at Stamford North. Secondly, given the unanticipated risks and delays that could be reasonably expected from the delivery of a sustainable urban extension for approximately 2,000 homes, which have considerable scope to delay estimated delivery rates, this overprovision in supply should not be considered an unreasonably high figure which needs to be amended. The Council is required to ensure its policies identify a sufficient supply and mix of sites to meet its identified minimum need figure. If part of a sustainable urban extension to the north of Stamford is included in the Plan, the Council must ensure it is also allocating enough smaller sites in sustainable locations to support villages, such as Whissendine. The Council must ensure it has enough flexibility in its supply to meet its identified housing need in the short term, such as Greenlight's sites (WHI11/WHI12), alongside part of any sustainable urban extension at North Stamford. To achieve this, the Council should be testing a higher overall housing need figure for the Plan period. Planning for a higher overall housing requirement would allow the sustainable urban extension to Stamford to come forward, alongside the Council's original, preferred spatial strategy, which seeks to focus development to sustain existing Market Towns and LSCs. Concentrate higher percentage of 80% (and not70%) in our two towns. Consider other ways to use land for
3485	[1085]		environment improvement and make a larger contribution to reducing climate change. Delivering a higher proportion of growth at Uppingham & Oakham rather than continuing with the Core
			Strategy will assist with the Council's climate change strategy, by locating growth in the most sustainable
		Marrons (Mr	settlements. It will also ensure that population growth greater than the modest increases seen between
		Dan	2011 and 2020 (Table 7.2 of the SA Scoping Report) relative to other less sustainable locations. A town
		Robinson-	focussed strategy will also avoid piecemeal development and potentially provide the critical mass to
		Wells,	deliver local infrastructure that is currently only aspirational, such as the Uppingham Relief Road.
		Associate	Any growth on the edge of Stamford is likely to be meeting needs in Stamford, which is in SKDC and
	Vistry Homes East	Director)	therefore should be part of SKDC and considered carefully. Stamford is not where RCC housing market
3436	Midlands [1070]	[535]	area derives its housing needs.
3429			NPPF paragraph 69 encourages the development of small and medium sites as these can be brought
			forward quickly. This is vital for Rutland which cannot demonstrate a 5-year supply of housing land and
			needs to make up the shortfall.
			Paragraph 69.a) requires at least 10% of LPA's housing requirements to be accommodated on sites no
			larger than 1ha. Paragraph 69.c) supports the development of windfall sites within existing settlements.
			Paragraph 78 acknowledges that exception sites can be facilitated by including some market housing.
	Ms Kate Wood [580]		Paragraph 79 encourages the promotion of sustainable development in rural areas through opportunities



		for villages to grow and thrive in order to enhance and maintain the vitality of rural communities. I represent several clients who have small sites or are small house-builders. Sites within the PLDs of villages are a finite resource and opportunities to add dwellings to villages needs to be balanced between stuffing villages with new development at the expense of maintaining their rural character, and extending them into the countryside whilst maintaining their village character. To this end it seems that extensions to the edges of villages would be an appropriate and NPPF-compliant way to facilitate windfall / edge of settlement development with some degree of certainty. The Council should introduce a policy relating to windfall development on the edges of settlements of Smaller Service Centre status or higher. Sites of up to one hectare would support the NPPF requirement to accommodate at least 10% of housing requirement on smaller sites, and would support the vitality and viability of villages and their facilities and services including shops, pubs, bus services and primary school PANs. A windfall sites / edge of settlement policy could specify a maximum number of dwellings in relation to village size (other Councils' Local Plans include maximum numbers or a proportion of the settlement's existing housing numbers over the Plan period). Up to 30 houses on a 1ha site (i.e. up to 30dph) would meet the requirement to make the best use of land and would be of sufficient critical mass to secure affordable housing and other community benefits. Sites of this size can be developed quickly. Acknowledging and encouraging small developments on the edges of settlements through a criteria-based policy is more suited to addressing opportunities as they arise. Whilst sites can and are promoted for allocation, it is sometimes the experience that focusing allocations to a small number of large development sites (SUE's etc) results in no allocations at all lower in the settlement hierarchy, leading to missed opportunities
2204	Mr Adam Cade	
3394	[1078]	Where sufficient infrastructure. Q13- A combination of Option A and E is supported. The principle of directing development to the most
		sustainable settlements within the County is consistent with the objectives of the NPPF and reflective of
		the established evidence in respect of the settlement hierarchy (as per the Core Strategy and the withdrawn Local Plan 2018-2036). Meeting growth through a sustainable community at Quarry Farm
		(promoted by our client Allison Homes), as part of the Stamford North Sustainable Urban Extension, is a
	Freeths LLP (Mr	proportionate and logical strategy. It is necessary for the delivery of the wider Stamford North SUE (an
	Mark Bassett,	allocation within the South Kesteven Local Plan), which is critical to the housing delivery strategy for
3291	Director) [630]	neighbouring South Kesteven District Council (SKDC). Without land at Quarry Farm, the wider Stamford



			North SUE fails and cannot be delivered. Following the proposed allocation for residential development in the now withdrawn Local Plan, an outline planning application for the Quarry Farm site (650 dwellings) was submitted by Allison Homes in February 2022. It is a deliverable solution for significant housing within the County should the local planning authority determine that the site is required to meets its own needs. Notwithstanding what decision is taken on whether the site seeks to meet housing need for Rutland or SKDC, the site remains critical to future housing delivery for SKDC. Allison Homes remain in consistent dialogue with the developers for the SKDC element of the Stamford North SUE in delivering site wide infrastructure and both local planning authorities as it looks to secure planning permission on the site. Q14- The online form gave no option but to say 'agree' or 'disagree'. To enable submission, we choose 'agree' but the matter is more nuanced than this and would benefit from further comment. The decision whether the site meets Rutland or SKDC needs should be informed by a range of factors including the ability to accommodate the housing requirement within sustainable locations within Rutland and discussions with SKDC, in a context whereby the previous proposed Local Plan allocation was to assist in meeting SKDC's housing needs. One solution could be to attribute a proportion of any allocation at Quarry Farm to SKDC and retain the balance. Whatever the decision, Rutland and SKDC need to re-engage on the Duty to Co-operate in respect of the Stamford North SUE extension and other relevant strategic issues as a matter of urgency and demonstrate greater effectiveness in cross boundary planning matters.
			Option A would be the most appropriate as it provides the majority of growth in the, or on the edge of the, two market towns. This will assist in the continued sustainability and viability of these towns and provide development in areas where the majority of the local employment and services are located along with existing infrastructure such as utilities, transport and sewage systems. It will also allow for a certain
			amount of growth in the villages to support their continued sustainability and viability. This option would also mean that additional infrastructure needed would be minimised.
			Option E makes no sense in planning terms and will lead to substantial additional infrastructure
	Edith Weston Parish		requirements. It would mean that a third town is created depriving Oakham and Uppingham from future
	Council (Parish Council		sustainable growth and could lead to these towns becoming less viable. Wherever its location it would lead to a large development with a large population having to further travel to employment and
	Representative)		potentially services having a negative effect on reducing climate change. As no development would be
3255	[411]		required in the local service centres it would have an adverse impact on the viability of those centres.
		Bidwells (Mr	
	To to Marion	Mark Harris,	
3190	Taylor Wimpey Straetgic Land [660]	Partner) [659]	See separate email submission
2130	Straetgic Land [000]	[ويع]	see separate email submission



3025	Mr Malcolm Touchin [1038]		A suitably balanced approach to land-use should feature in the plan, to ensure we set aside enough for housing, business/industry/retail, agriculture, energy generation, leisure/tourism, etc., bearing in mind any dependencies across county borders (Issue 2, Q8, Q10, Issue 2b, Issue 6, Issue 11, Issue 12). Brownfield sites which already have much of the relevant infrastructure provision should be favoured for housing development, bearing in mind also that conversion/refurbishment of older buildings is much more environmentally friendly than demolition and new build. Again, I chose not to answer Q13, but the form would not close unless I ticked box.
2883	Mr Simon Frearson [1047]		The area of land adjacent to the west of A1 and Stamford MUST be included in the Rutalnd Local Plan. It would be criminal to allow this to be allocated to another County e.g. Lincolnshire
2838	CPRE Rutland (Mr Ron Simpson, Chair) [1036]		Urban areas are all about concentrating housing growth where infrastructure exists or is being planned. In Rutland that is Oaham and Uppingham. CPRE is supportive of the Uppingham N Plan on the principle that it is created and approved by its local community. CPRE supports housing and infrastructure allocations determined at local level subject to regard for the surrounding countryside and any available urban brownfield sites. CPRE does not support a very large single development such as previously proposed for St Georges. That would make an excellent power station. Accepting earlier CPRE statements challenging the assumption that we must act like all other counties rather than coming up with a set of policies founded on collaboration of purpose, housing growth must be that required to ensure sustainability of our rural way of life. What long term limits might be established by the new plan? When do we stop covering the countryside with unaffordable housing? At what point will the garden that is Rutland be lost forever? The Rutland Vision sets out the desire to protect the Rutland countryside. We are in danger of failing at the outset. The infrastructure of Oakham and Uppingham must be strengthened to address the ultimately agreed housing provision. This will require greater justice in the allocation of the RCC component of CIL and Section 106 monies to the neighbourhood in which housing is built.
		Montagu	The DIO agree that the strategy of promoting sustainable development and the use of brownfield land in
	Defence Infrastructure Organisation (DIO)	Evans LLP (Miss Lauren Hawksworth, Associate)	existing towns first, to reduce the need to travel, creating healthy communities and improvement of biodiversity, is fundamental to the future growth of Rutland. This approach accords with national planning policy. However, the total housing growth required in the County is unlikely to be delivered through smaller
2830	[1042]	[1041]	brownfield sites, or around the edge of towns using greenfield land. This would need to take place



			throughout the County with incremental growth accommodated by each town and village. Encouraging the development of small-scale brownfield sites (circa 5 – 10 homes) is a valuable approach to housing delivery and does offer a meaningful and sustainable supply of new homes, but this is only part of the approach. The Issues and Options document, at paragraph 3.4.13 onwards, refers to the NPPF and recognises that the supply of a large number of new homes is required and often best achieved through planning for larger scale development, including the previously identified new community at St George's Barracks (as allocated in the now withdrawn Local Plan). The St George's Barracks site is an existing Brownfield site, which will soon cease to operate for its original purpose. The development potential of the Site includes opportunities to create a new sustainable community, through the creation of new homes, new jobs, the re-use of existing buildings, protection of heritage and landscapes, and enhancements which will benefit new and existing communities if planned correctly. This is the only significant site which can provide a larger scale development to deliver a truly sustainable new community, as demonstrated throughout the Council's own existing evidence base documents. The St George's Barracks site is a sustainable, viable and deliverable development site and the largest brownfield site in the County. We therefore believe that Option E is the most appropriate approach, alongside sustainable growth which best uses the available land in the existing towns, without adding pressure to their character, infrastructure and community services.
2775	Jeakins Weir Ltd [1037]	Mr Alasdair Thorne [562]	Our preferred approach to growth is Option B. Clearly a greater level of provision could increase pressure on local infrastructure but coalescing development in a single location will provide the Council with opportunity to coordinate, fund and deliver the necessary infrastructure to meet identified local needs. As is illustrated above the Council already performs poorly in respect of deprivation in the context of housing and access to services domain. Clearly a dispersed approach to development would be likely to exacerbate this issue unless development is of a scale that makes a significant contribution to enhancing existing infrastructure and access to local services and facilities. Oakham is the largest and most sustainable settlement in the County and provides access to a range and services facilities. Moreover public transport provision and access to active travel options will be higher within this settlement than smaller settlements in the County. Concentrating development in and around Oakham would provide the best opportunity for the Council to tackle the climate crisis and reducing energy use by providing access to services and facilities and supporting transport choice. In contrast a more dispersed approach to development would clearly increase car dependency and will reinforce existing issues related to access to services.



This is not to say that no growth should be apportioned to smaller settlements. There will be a need for some market and affordable need in smaller settlements and where the evidence is available to justify some growth then this should directed to lower tier settlements. However if the Council is serious about tackling climate change and improving access to services and facilities then growth should be tilted further towards Oakham.

We do not consider that the creation of a new settlement can provide a sustainable solution to meeting the County's growth needs. Clearly the County is relatively small and its housing and employment needs reflect this. The low levels of growth proposed would not, in our view, provide the critical mass needed to deliver a new sustainable community, except over the very long term.

The Council sought to rely on a new sustainable community at St Georges Barracks in the withdrawn Local Plan 2018-2036 and the failure to achieve suitable funding was the principle reason the plan had to be abandoned. Simply following the same approach again is not considered a reasonable approach. Indeed, to pursue such an option would not be sustainable as much of the infrastructure required to create a balanced and sustainable community would take many years to deliver owing to the limited number of homes that could be bought forward quickly. This would additionally undermine the Council's aspirations to address climate change, provide transport choice and improve access to services. This adds further weight to the conclusions that this option should not be supported.

We are aware that there is potential to deliver new homes within the administrative area of Rutland but as part of an Urban Extension to Stamford.

Whilst the Council have posed the question on whether this could count towards meeting Rutland's housing requirement it is noted that the Council's consultation document states 'an allocation is included in the adopted Local Plan for South Kesteven District Council for development at Stamford North, on the basis that any development in Rutland as part of a wider comprehensive urban extension to the north of Stamford would count towards South Kesteven's housing needs rather than Rutland's. The Council has opened up discussions with South Kesteven on the basis that development on the Rutland element of any urban extension to Stamford should count towards Rutland's housing needs and so reduce the requirement for new housing elsewhere in Rutland.' It would appear that the Council has already made up its mind on this issue.

However, we would point out that the proposed Quarry Farm site which forms part of the Stamford North development is not well related to any of the County's main towns and hence communities who live in Rutland. The main towns of Oakham and Uppingham being a 20-25 minute car journey or in excess of a 4 hour walk. Clearly development on the edge of Stamford is sustainable and will deliver a sustainable community. However, this site will not address local housing needs for Rutland. Any future residents may,



		as a matter of fact, live in the County but they will clearly look towards Stamford and access employment and facilities in that town given its proximity and relationship. In this context whilst claiming housing delivered as an urban extension would help the Council meet its numerical housing requirement it will not address local housing needs and will in effect reduce housing delivery in locations where there is a genuine affordable and housing need which should be met. In short, we do not consider that this site should count towards meeting Rutland's housing needs. It would clearly reduce housing delivery targeted at the main towns of Oakham and Uppingham and would deliver homes in a location where there is no obvious housing need in Rutland.
2727	Jane Bateman [124]	I strongly believe that development SHOULD NOT go ahead without the supporting infrastructure especially if it is in neighbouring councils.
2/2/	Braunston Parish	especially if it is in neighboding councils.
	Council (Mrs Carole Brown, Parish Clerk)	The balance between Oakham and Uppingham should follow the development of local employment. St George's barracks and Woolfox development at appropriate scale with properly planned infrastructure
2717	[1003]	driven by local employment plans
2054	Mrs Karen Hubbard	
2651	[1033]	Nearer to Stamford, Melton & Corby where larger facilities can be found
		LOCATION OF GROWTH (Additional comments regarding Question 13):
		Supporting Rural Settlements
		The NPPF states that, in rural areas like Rutland, "planning policies and decision should be responsive to
		local circumstances and support housing developments that reflect local needs" (paragraph 78). It also states that "housing should be located where it will enhance or maintain the vitality of rural communities"
		and that plans "should identify opportunities for villages to grow and thrive, especially where this will support local services."
		The critical distinction in relation to Rutland, and in particular its Local Service Centres (LSCs), is that
		"where there are groups of smaller settlements, development in one village may support services in a
		village nearby." That reflects that villages within rural areas can often operate as networks that collectively
		meet the daily needs of their residents. The emerging Local Plan should, therefore, seek to facilitate the
		sustainability of its villages through planned residential growth, particularly as this will support the delivery
	Define (on behalf of	of new infrastructure, services and facilities, as well as support existing ones. If RCC is to positively plan for
	William Davis	its residents' needs in the forthcoming Local Plan, it would be prudent to align that residential growth with
	Homes) (Mr Sam	appropriate infrastructure provision and improvements in sustainable travel (see WDH's response to
	Perkins, Graduate	Question 40).
2623	Planner) [1027]	Whilst it is recognised that the final spatial strategy will seek to balance a number of considerations, and is



likely to be a hybrid of two or more of the options set out in Question 13, it is critical that the plan focuses increased growth to LSCs than has been experienced in recent years to recognise and maintain their role within the settlement hierarchy. Indeed, the 2020/21 Authority Monitoring Report (AMR) states that only 4% of dwellings completed since the start of the plan period were in LSCs, with 78% in Oakham and Uppingham, and 15% across the County's Smaller Service Centres and Restraint Villages. It is imperative, therefore, that this imbalance (particularly between RCC's LSCs, Smaller Service Centres and Restraint Villages) is redressed by increasing the level of growth that is focused to the LSCs. Option D is, therefore, supported by WDH and should form a key part of a balanced spatial strategy that seeks to achieve a more appropriate distribution of growth through the settlement hierarchy.

Developing a Spatial Strategy

In developing an appropriate spatial strategy, RCC should take account of the merits of all options. Whilst it is recognised that the Sustainability Appraisal (SA) will form a key part of that process, it should not be the sole determinative factor. Rather, RCC must take account of nuanced practical matters that the SA cannot itself consider. Indeed, that process should take account of committed development, ensuring the deliverability of the spatial strategy, supporting rural communities and the vitality of the services and facilities therein, and responding to site and settlement-specific constraints and opportunities. By balancing considerations arising from the SA and less quantifiable matters such as those, RCC can bring forward a balanced spatial strategy that realises the Plan's objectives and responds to its key issues. An example of that is the direction of growth to Main Towns. Indeed, whilst significant growth will inevitably be focused on Oakham and Uppingham, the delivery constraints associated with Oakham that were highlighted in the now withdrawn Local Plan mean that it would be reasonable for growth to be focused more on Uppingham; which is a point that an SA-focused approach may well overlook. Likewise, the benefits of locating growth in LSCs in order to support the wider network of villages and their populations (including, for example, the delivery of sustainable transport options) are also nuanced considerations that may not be picked up by an SA as they are rather less quantifiable. It is critical, therefore, that RCC takes full account of those considerations, and should recognise how locating new growth at appropriate locations in LSC settlements can achieve a number of the Plan's objectives, and create more sustainable lifestyles.

In light of the above considerations, therefore, it is clear that the spatial strategy should focus growth to the Main Towns (Uppingham in particular) and LSCs in the first instance (Question 13 Options C and D).

Cottesmore



In directing growth towards LSCs to remedy the previous under-supply of housing within them, maintain the vitality of key services and facilities and support the daily needs of residents, growth should be directed towards Cottesmore in particular; in reflection of its role as a sustainable LSC.

That was reflected in the 'Sustainability of Settlements Assessment Update' Background Paper that was prepared in November 2019 to support the withdrawn Plan, which highlights that Cottesmore is the joint third most sustainable Local Service Centre, and the most sustainable Local Service Centre settlement in the north of the County. In that regard, Cottesmore acts as a centre for its surrounding hinterlands, which includes smaller settlements such as Barrow, Teigh, Market Overton, Thistleton, Ashwell, Greetham, Stretton, Exton, etc.

Cottesmore has a range of services and facilities, including St Nicholas C of E Primary School, Cottesmore Post Office and convenience store, a public house and a sports club. It also benefits from access (including via the RF2 bus service) to the various services and facilities that are located within Oakham, including supermarkets, a hospital and the retail outlets associated with the town centre. Oakham has its own train station that provides access to the surrounding area with services to Leicester, Melton Mowbray, Peterborough and beyond. The RF2 services also provides a connection from Cottesmore to the wider area of Rutland.

Cottesmore is, therefore, clearly an inherently sustainable location for growth and has the capacity to accommodate it as part of a spatial strategy that focuses an increased level of growth to the County's LSCs in order to address recent under-delivery. This strategy will support the network of villages in the north of the County that respond to the daily needs of existing and new residents. Focusing growth to the settlement would be testament to positive planning.

Land North of Mill Lane, Cottesmore

As part of that, development should be focused to suitable sites within those sustainable locations for growth, including WDH's site at 'Land North of Mill Lane, Cottesmore.' This site is located to the north of Cottesmore and it therefore benefits from accessibility to the key services and facilities referred to above. The site is subject to a pending full planning application for the development of 93 dwellings (including 30% affordable homes), and associated access, drainage and green infrastructure (RCC Ref. 2022/0604/MAF). Its supporting documents demonstrate the suitability of the site and provides a robust basis for its development capacity. The application was submitted in May 2022, and thus far there have been no objections to the proposals from statutory consultees aside from the Parish Council. The application is supported by a suite of technical and environmental assessments that demonstrate the development is acceptable in access and highways terms, and that the scheme can sensitively respond to



		the surrounding context to ensure it is acceptable in landscape and visual amenity terms, with no harmful impact on designated heritage assets. They also confirm that the site is of low ecological value with an achievable net gain in biodiversity, through the retention of existing features and enhanced open space, and that an appropriate drainage strategy can be implemented that will considerably reduce surface water runoff from the site. The application demonstrates that the site is clearly a suitable development opportunity. The site was previously identified as a proposed allocation in the Draft Local Plan, reflecting that the site is suitable for development and is the only reasonable direction for growth in Cottesmore on land that is not safeguarded from development by the made Neighbourhood Plan. Indeed, it was only removed as a proposed allocation in the Local Plan to allow for a new strategy that focused on delivering a strategic development at St George's Barracks (which formed the basis of the now withdrawn Plan). The Landscape Masterplan that has been submitted alongside these comments demonstrates the suitability of its site and its capacity to deliver 93 dwellings. Moreover, the site is immediately available for development subject to the grant of planning permission and, therefore, can play a key role in delivering housing in the early stages of the plan period. Land North of Mill Lane, Cottesmore should, therefore, be identified as a proposed allocation site to reflect its suitability, availability and deliverability.
		STAMFORD SUSTAINABLE URBAN EXTENSION (Additional comments regarding Question 14): Growth to the north of Stamford would functionally and geographically relate to the South Kesteven District and would effectively meet the housing needs and demand arising from Stamford itself. That was recognised in the now withdrawn Local Plan, which stated that the development will "meet the housing and economic needs of the town in the future" and that "the site would not normally be allocated in Rutland to meet Rutland's own housing need as it does not relate to the towns or LSCs within the County." Growth should, therefore, relate only to South Kesteven's housing needs.
2605	Ms SUSAN SEED	Oakham Town is a disgrace it is all charity shops and estate agents. It needs a complete overall. Developing more houses in Oakham should be done along side putting and helping more Business to come into the high street and make it more attractive. Growth should be spread across the county with a larger proportion attached to the larger towns of Oakham and Uppingham. These have the infrastructure. NO NEW COMMUNITIES until you get the County town and all else right. Get your towns in order and the communities will grown naturally which is how things should grow. Not
2605	[1028]	have large developments forced on communities.



			I would like to point out that I disagree with all the options above but have to choose one to complete my
			opinion. There should be no question whatsoever that any development in Rutland which is part of an urban extension to Stamford should not count towards reducing the requirement for new housing in Rutland.
2584	Mr Jonathan Griffin		This proposed Quarry Farm development should never have been allowed to be taken out of Rutland's allocation previously in the first place which was both misguided and highly unethical. Housing growth in Rutland should be centred around urban extension to existing towns nr Stamford, Oakham and Uppingham.
2570	Ms Lelia O'Connell [1008]		Uppingham is specifically looking to increase its housing allocation. This should be allowed. The 650 Quarry Farm allocation should be returned to the RUTLAND housing allocation and should never have been transferred to the Stamford allocation in the first place!
			Question 13 Options for the spatial strategy for new housing development: Which option(s) do you consider to be most appropriate to include in the Rutland Local Plan?
			The NPPF contains national policy which will help with the selection of a spatial strategy for the emerging RLP. Paragraph 7 identifies achieving sustainable development as a purpose of the planning system. Paragraph 8 identifies economic, social and environmental objectives as the overarching objectives of the planning system to deliver sustainable development. Paragraph 11 explains the presumption in favour of sustainable development, and for plan-making means that plans should promote sustainable patterns of development, meet development needs, align growth and infrastructure, improve the environment, and mitigate and adapt for climate change. Paragraph 104 identifies the transport issues that should be addressed at plan-making stage and includes opportunities for sustainable modes of transport and taking into account environmental impacts of traffic. Paragraph 105 of the NPPF expects the planning system to actively manage patterns of growth to support transport objectives, and states in part that "Significant"
		Carter Jonas (Ms Kimberley	development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health". There is a clear link between the location of growth,
	Pigeon Investment	Brown, Associate	access to sustainable modes of transport, and air quality. It is requested that all of these references to national policy are considered in the selection of the preferred spatial strategy for the emerging RLP.
2539	Management Ltd [1022]	Partner) [601]	Pigeon is promoting land for a high-quality landscape and design-led scheme in Oakham, and as such it supports further growth at this settlement. It is considered that a spatial strategy for the emerging RLP



that directed further development at Oakham would be consistent with national policy. Oakham is the largest town and most sustainable location in Rutland. It contains a good range of services and facilities, it provides a range of employment opportunities, and there are sustainable transport options available for travel within and to and from the town. The SA Scoping Report for the emerging RLP identified few environmental constraints on the edge of Oakham e.g., nature conservation, heritage assets or flood risk constraints, and development in this location could avoid significant impacts on protected areas. For all these reasons, preferred spatial strategy Option A and Option B are supported because they would focus growth at the sustainable location of Oakham.

Option E relates to development at a new settlement or settlements. These types of development are more complex than other options, and typically take much longer to pass through the planning process before development is delivered and require substantial levels of primary infrastructure that needs to be funded and provided in advance of housing development. It is also the case that new settlements cannot provide policy compliant levels of affordable housing because of the need to fund necessary infrastructure. These matters should be considered when assessing a new settlement or settlements option for the spatial strategy of the emerging RLP.

Question 14: If development in Rutland is proposed as part of a sustainable urban extension to Stamford should this count towards Rutland's housing needs and so reduce the requirement for new housing elsewhere in Rutland?

We do not agree that a sustainable urban extension at Stamford should count towards Rutland's housing needs. The Pigeon representations to Question 11 also addressed this matter. The representations to Question 11 requested that, if housing provided to the north of Stamford within Rutland's administrative area is intended to meet unmet housing needs of South Kesteven, then this should be added to the housing requirement for the emerging RLP. Paragraph 61 of the NPPF explains how housing needs should be assessed, and states in part that "In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for". This means that if unmet needs from South Kesteven are to be accommodated within Rutland then that housing figure should be added to the housing requirement for the emerging RLP. Any other approach, including a reduction to Rutland's housing requirement, would mean that those unmet housing needs of South Kesteven would remain unmet, which would be contrary to the purpose of the duty to co-operate in terms of meeting housing needs of neighbouring authorities.

As set out in the representations to Question 11, Rutland has previously agreed to accommodate unmet housing needs from South Kesteven on land to the north of Stamford, at Quarry Farm. That agreement was confirmed through the duty to co-operate process for the adopted South Kesteven Local Plan (January



		2020). The emerging South Kesteven Local Plan Review consultation documents anticipates a similar approach. The withdrawn RLP February 2020 included a proposed allocation at Quarry Farm in Rutland for 650 dwellings intended specifically to meet unmet housing needs from South Kesteven as part of a comprehensive development to the north of Stamford.
		If it decided that there are unmet needs from South Kesteven and it is agreed that those needs should be accommodated within Rutland, then those needs should be added to the housing requirement for the emerging RLP.
2468	Francis Jackson Homes Ltd (Mr Paul Johnson, Land and Planning Director) [761]	Any housing growth adjacent to Stamford should be reflected in the duty to co-operate and those houses - rightly and logically - should be considered to support housing provision at Stamford within the adjacent Local Authority area. Otherwise RCC could be accused of seeking to deliver housing there to reduce the requirement for housing (and ignoring actual local housing needs) within the actual villages and towns of RCC itself.
2444	Uppingham Town Council (Parish Council Representative) [445]	NO NO
2351	Limes, Firs & Spurs Resident's Association (Mr David Ainslie, Chairman) [1006]	No
		Option E should not be considered. The housing need can be achieved by the growth of the two towns and small scale deveopment in the service centres and other villages. The development of a new community or "new town" at St Georges or Woolfox would: a) reduce the economic viability and vitality of the two market town of Oakham and Uppingham, b) mean that far less development takes place in the local service centres and villages resulting in the stagnation of those communities rather than providing a small but essential growth for their sustainability c) result in RCC not achieving its climate targets as most from any development of that type would commute d) result in major infrastructure works which would not be necessary in the case of option A
2305	Mr Peter Coe [1004]	e) put unnecessary increases in traffic on roads that are not able to support it



		f) not be viable
		g) have a major negative impact on the county's rural character and landscape
		h) have a major negative impact on any adjoining or nearby communities
		No mention is made of the Caldecott area for specific development. This is said given the proximity to Corby/Kettering for employment purposes and the proximity of Gretton (soon to have a new crematorium) and Great Easton (which has a shop / post office). For so long as employment requires transport we should seek to maximise the location of new homes in
		proximity to such opportunities, particularly given the almost complete absence of affordable public transport in Rutland
2296	Mr Murdo Ross [890]	Q. 14 - The idea that Quarry Farm (Stamford North) should not be included in the new Rutland Local Plan is simply not acceptable.
	Uppingham	
	Neighbourhood Plan	
2260	Group (David Ainslie)	
2260	[270]	No Option A with flexibility to increase the proportion in Oakham or Uppingham if the towns are in favour of
		that.
	Mr David Denness	I am strongly opposed to Option E and including this would not be supported by the rural population of
2236	[990]	Rutland and merely serve to reopen old wounds.
		Previous adopted Local Plan policy was clear, sustainable and largely in line with comparable authorities; namely in directing growth firstly to the major centres and secondly to lesser centres with capacity. The abandoned local plan was largely based on off centre or greenfield growth at St George (77%) and then the major centres. The proposed 'Garden community' was never going to be viable with insufficient pricing and major infrastructure costs. Clearly the right path would be to return to the former hierarchy policy (Option A).
		Whilst the 'duty to co-operate' has been found amusing, it remains laudable. Plans for Oakham and
		Uppingham should closely reflect those for adjacent centres like Stamford and Peterborough. Those centres may be better positioned than Rutland to accommodate some growth provided that is realistically
2212	Alistair Parker [959]	feasible. Stamford North was said by the Inspector to be only "marginally viable".
	Hugh Cheneywood	Any new sustainable community must be well separated from existing local service centres ,eg Woolfox
2168	[839]	NOT ST Georges barracks



	Edith Weston	
	Neighbourhood Plan	
2046	Group (Julie W) [783]	Fully & fairly reconsider Woolfox as a tri regional sustainable town.
		I have ticked A - but I really wanted to tick A & E
		I feel that Woolfox was not considered last time on a fair on open playing field given the MOU signed with
		the MOD.
		Woolfox if it passes all you assessments could be a huge benefit for Rutland - it will improved connections,
		add footfall into our two market towns, offer economic development, assist with schools and medical
	Edith Weston	facilities its of much better scale and location to be truly sustainable - The new development in Oxford by
	Neighbourhood Plan	Grosvenor Estates should be a bench mark - or Rutland has the opportunity to create the first Carbon
2010	Group (Julie W) [783]	positive new town - This could be very exciting - using local universities to assist.
		In determining the location of new housing, it is essential that any growth in carbon emissions from new
		car journeys is minimised. Planning for the location of new housing must be done in a co-ordinated fashion
		alongside planning for improvements in public transport and essential services such as schools, shops and
1896	Mr David Lewis [983]	medical services.
		Housing should be allowed where there is a local need and this should include the smaller villages. The
	Ms Rosemary Harris	policy to date of not allowing housing in these small settlements amounts to social engineering by the
1881	[984]	planners and it is misguided. It is detrimental to the economic and social potential of these rural areas.
	Mr Paul Hargreaves	Build houses on safe 'brown' land. For example the airfield at RAF North Luffenham (what happened to
1861	[966]	that plan?) but not next to Rutland Water as it has had enough commercial development over the years.
	South Luffenham	
	Parish Council (Mr	
	Victor Bacon,	
1824	Councillor) [982]	Not option E this would be back to the original St georges issue
		Any development inside the Rutland border should count towards Rutland's housing needs. St Georges
		was the ideal location to offset most of our housing need, without too much impact on climate as most of
1779	Mrs Kim Cross [978]	the infrastructure is already there.
	Great Casterton	
	Parish Council (Mr	
	Mark Bush,	
1734	Chairman) [961]	Quarry Farm (North Stamford) needs to be taken into account as does the future of St Geoirge's
1700	Barry Hobbs [646]	No



1	Mr David Billsdon	
1679	[970]	Ensure housing is close to employment. Avoid development where road system is unclassified.
	Mr Andrew Lunn	New housing next to main road networks or in existing townships that have infrastructure not in isolated
1504	[689]	rural villages.
	Janet Underwood	The development in proposed local service centres should only be carried out if there is an absolute and
1479	[125]	deliverable commitment to improved infrastructure in and around these local service centres.
1290	Mr Tony Wray [545]	A significant amount of small scale development of low cost, carbon zero, affordable, attractive rural homes could be delivered across many of the Rutland villages and make a contribution to the vitality and sustainability of all Rutland villages. The notion Limits Of Development that are applied to all villages are completely outdated. Land and buildings have been developed outside of these limits, even in the so called Restraint Villages. There is a considerable bank of potential sites that could deliver excellent solutions for local family first time buyers rather than the large, expensive vanity projects that have been approved in recent years. In fill and edge of village development solutions for innovative designs that deliver attractive, rural, carbon zero affordable homes can add significantly to the future vitality and sustainability of our villages. development of this nature can take some of the pressure off of edge of town/out of town developments.
	Oakham Quaker	
	Meeting (Ms Susan	
1279	Bolter, Clerk) [941]	Build out Woolfox
	CLA (John Greenshields,	Development of housing must be encouraged, as an increase in supply will make housing more affordable and will provide much needed opportunity. This is especially important in rural areas which have been artificially starved of sustainable development by being placed low down in the Settlement Hierarchy. This creates a negative cycle which affects investment in infrastructure and the Council's decisions amplify this. The cycle must be broken and provide much needed development and houses to rural areas, in order to improve the sustainability. In the Council's data the starving of rural housing is clear. Since 2013/14, as a percentage share, the delivery of rural houses has always been below its own average since 2006 and sank to a low of 3.59% in
	Chartered Surveyor)	2017/18. This shows clearly that rural areas are being starved of essential development and this must
1260	[937]	change. Otherwise the Council is forcing decline on rural areas and villages.
	Normanton Parish Meeting (Mr Christopher Renner,	
1245	This is my personal	Uppingham seems to want more housing so focus on development there.



	view from	
	Normanton Parish	
	Meeting) [109]	
		Part of what makes Rutland special is the relationship between our two small towns (and myriad of
		villages) and the surrounding countryside. That is already being irrevocably eroded in Oakham and to a
		degree Uppingham as the towns push out further into the countryside, severing the link between the town
		centres and the countryside, and meaning you have to drive past/through generic and sadly very poorly designed housing estates.
		Sustainable new communities, like that suggested at St Georges Barracks, would alleviate the pressure
	Mr Rob Ormrod	from existing settlements, and if properly planned and well designed could provide areas for future growth
1232	[930]	without ruining what we've already got.
	Mrs Hilary Smith	option A follows previous panning policy which has worked well. A " new town " development should not
699	[868]	be considered in such a small county
ı		Again I have selected option B because currently there is some existing road infrastructure around the
		town and some brownfield sites within and around, BUT the local health care services are already under
		CQC review so we have to add a NEW doctors surgery, more dentists AND address the roads within the
		town and around the train station.
i		Option A is good in principle to spread the growth but we still need to add healthcare services somewhere
	Marika ara Nasa I	and it should be in Oakham as the largest of the two towns. But the train and busy roads will remain an
COF	Mrs Karen Nagel	issue whichever option picked, hence I believe if we are looking for the cheapest option I should imagine it
685	[866]	is B.
C 40	Mr Andrew Nebel	Larger villages should not all be set the same housing growth targets Villages like Ryhall that are close to
649	[864]	major developments should be set lower goals.
		Only a few villages have school provision at primary level and even less at secondary. It makes sense to
		have affordable and social housing in these villages and the towns. The same situation exists for healthcare. Services such as healthcare, supermarkets etc have been moved and centralised in the two
		towns. This means thousands of car journeys each day to get people to these services and we know this is
		bad for the environment. We have little or no public transport to alleviate the pollution. The villages in the
		main cannot sustain growth whilst this persists. Sadly the two towns have to accommodate the additional
	Mrs Jayne Williams	population as more houses are built. This can only be allowed to happen if extra facilities are put in place
529	[857]	before planning permissions are granted.
446	Mrs Jo Munro [834]	Ketton
770	14113 30 14101110 [03-4]	Retroit



286	Mr Graham Layne	We need to ensure that future development is spread throughout the county. This will prevent shortfalls in infrastructure which occurs when development is concentrated in one location unless external funding is available (i.e. St Georges debacle). This will avoid the current development impact being experienced by Ketton at present.
252	Mr Christopher Jordan [712]	In the future the redevelopment of St George's Barracks will have to be considered. At present it will be an operational base for the Army until 2026, it also has some 200+ service houses leased to the Ministry of Defence by Annington Homes which could be possibly be released into the open market when the base in closed. The Officers Mess compound and main Barracks sites should be only developed within the area surrounded by the current security fences and current trees and green spaces protected. This should not be considered as a new large scale community. RCC should realise this site and Quarry Farm were the major reasons for the failure of the last withdrawn Local Plan
161	ANCER SPA Ltd (Mr Keith Webster, Principal Consultant) [742]	Uppingham can accommodate a higher proportion of growth. The emerging refreshed Uppingham Neighbourhood Plan demonstrates that there are suitable sites available to achieve a higher level of growth that will benefit the long term sustainability of the town.
2921	Mrs Laura Gray [1050]	New housing should be near the existing towns of Oakham and Uppingham