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21 December 2022

Mr R Ranson
Planning Policy Manager
Rutland County Council
Council Offices
Catmose
Oakham
Rutland
LE15 6HP

Dear Mr Ranson

Ketton and Tinwell Neighbourhood Plan, Regulation 16 Consultation

Thank you for the opportunity to comment on the above consultation on the Ketton and Tinwell Neighbourhood Plan. These representations are made on behalf of Vistry Group who have interests in Land north of Luffenham Road, Ketton. The site is approx. 7 ha and is currently in use for agricultural purposes and is capable of delivering around 130 dwellings (including 39 affordable homes). A site plan is included in Appendix A for reference.

Section 2 – Policy Context

The Draft Neighbourhood Plan sets out in the Policy Context section that the plan will not include any new housing or employment allocations, relying instead on the allocations made in the Local Plan Site Allocations and Policies DPD.

The Draft Neighbourhood Plan recognises that the Local Plan is out-of-date and Rutland County Council cannot demonstrate a five year supply of deliverable housing sites. The Core Strategy and associated Site Allocations and Policies DPD made provision for future housing requirements over a plan period ending in 2026. The new Local Plan covering a long period was withdrawn from examination in September 2021. Whilst the process of preparing a new Local Plan has started again, this is at early stage and will not be sufficiently advanced to inform this Neighbourhood Plan.

The Neighbourhood Plan proposes to set out the planning strategy for the Ketton and Tinwell area over an extended period 2022 to 2036. It is important that, as part of the development plan for the area, this additional ten years beyond the adopted Local Plan is planned for in the Neighbourhood Plan. It is inappropriate for the Neighbourhood Plan to seek to rely on allocations made in the adopted Site Allocations and Policies DPD which covers a much shorter plan period.

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Paragraph 66 of the NPPF advises strategic plan making authorities to establish a housing requirement figure for their whole area and within this overall requirement set out a housing requirement for designated neighbourhood areas reflecting the overall strategy. Paragraph 67 goes on to advise that where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body.

In the context of the withdrawn Local Plan, the Neighbourhood Plan Group have relied upon a generic indicative housing requirement figure set out in a report approved by Rutland County Council Cabinet on 16th November 2021 described as 'Advice to Neighbourhood Plans – Proposed Methodology for the Provision of Indicative Housing Requirements'. Based on this, the Neighbourhood Plan states that the Local Plan allocations are sufficient, however this fails to plan for a longer plan period or positively plan for the future development of Ketton. As currently framed, it is not considered that the Draft Neighbourhood Plan would meet the basic conditions.

The introduction to the Neighbourhood Plan sets out that the aim of the plan is to give the community the right to exert more influence over future development in Ketton and Tinwell parishes and the opportunity to influence the type of development, while protecting the distinctive character of our local area. Without planning for an appropriate scale of housing development, that takes account of the additional ten years beyond the adopted Local Plan period, the Neighbourhood Plan is in danger of failing to achieve this, leaving the village of Ketton open to further speculative development.

Neighbourhood Plan Policies

Policy KT 13 Location and scale of new housing (Ketton)

Ketton is a sustainable location for housing growth, it offers a range of facilities and access to public transport and is identified as a Local Service Centre in the Local Plan. The village has a primary school, post office and general store, public house and library.

It is therefore essential that the role of Ketton in supporting the delivery of the homes needed in the County is recognised in the Neighbourhood Plan and sites are allocated in Policy KT 13.

Currently Policy KT 13 unrealistically relies on the Local Plan allocations as sufficient to meet needs, however these were identified to meet housing need up to 2026, and so the Policy fails to plan for the additional ten years that the Neighbourhood Plan covers up to 2036. It is not considered that the Neighbourhood Plan meets the basic conditions.

Our client's site, land north of Luffenham Road, Ketton offers an opportunity to positively plan for the future development of Ketton, as a Local Service Centre. It would deliver homes within reasonable walking distance of the services and facilities available in the village and bus stops on Empingham Road, which provide services to Stamford and Uppingham for medical services, secondary school and higher order services. The scale of the development would also offer the opportunity to deliver new facilities in consultation with the Parish Council and community. This could include allotments to meet the need identified in Policy KT 12: Allotments.



There is an opportunity for the Neighbourhood Plan to locally decide the best location for growth at Ketton which will otherwise be decided by Rutland County Council or successful planning applications. The Neighbourhood Plan itself highlights that Ketton has been left vulnerable to unplanned/unallocated developments by the withdrawal of the local plan and without positive allocation of housing sites, the Neighbourhood Plan will not provide any protection from this. The Neighbourhood Plan as drafted will also not benefit from the additional protection from the presumption in favour of sustainable development, set out in paragraph 14 of the NPPF.

Policy KT 9 – Open Space provision in new housing development

The policy requires larger scale new housing development to include the provision of suitable green spaces to meet recreation needs arising from development and green corridors to help bring the countryside into the built environment. The proposals for development at Land north of Luffenham Road would make provision for areas of open space which would be wholly consistent with this policy.

Policy KT 12- Allotments

Policy KT 12 sets out support for the provision of an allotment site within or adjoining the village. Our clients Vistry Group would be happy to discuss the option of provision of allotment land, as part of the informal recreation area which would be delivered as part of the development, with the Neighbourhood Plan Group as part of an allocation to meet housing needs to 2036.

We hope the above comments are helpful to the examination of the Neighbourhood Plan.

Vistry Group would be happy to meet with the Neighbourhood Plan Group to discuss the issues raised above in more detail.

We request to be notified of Rutland County Council's decision under Regulation 19 (making a plan) in relation to the neighbourhood development plan.

Yours Sincerely

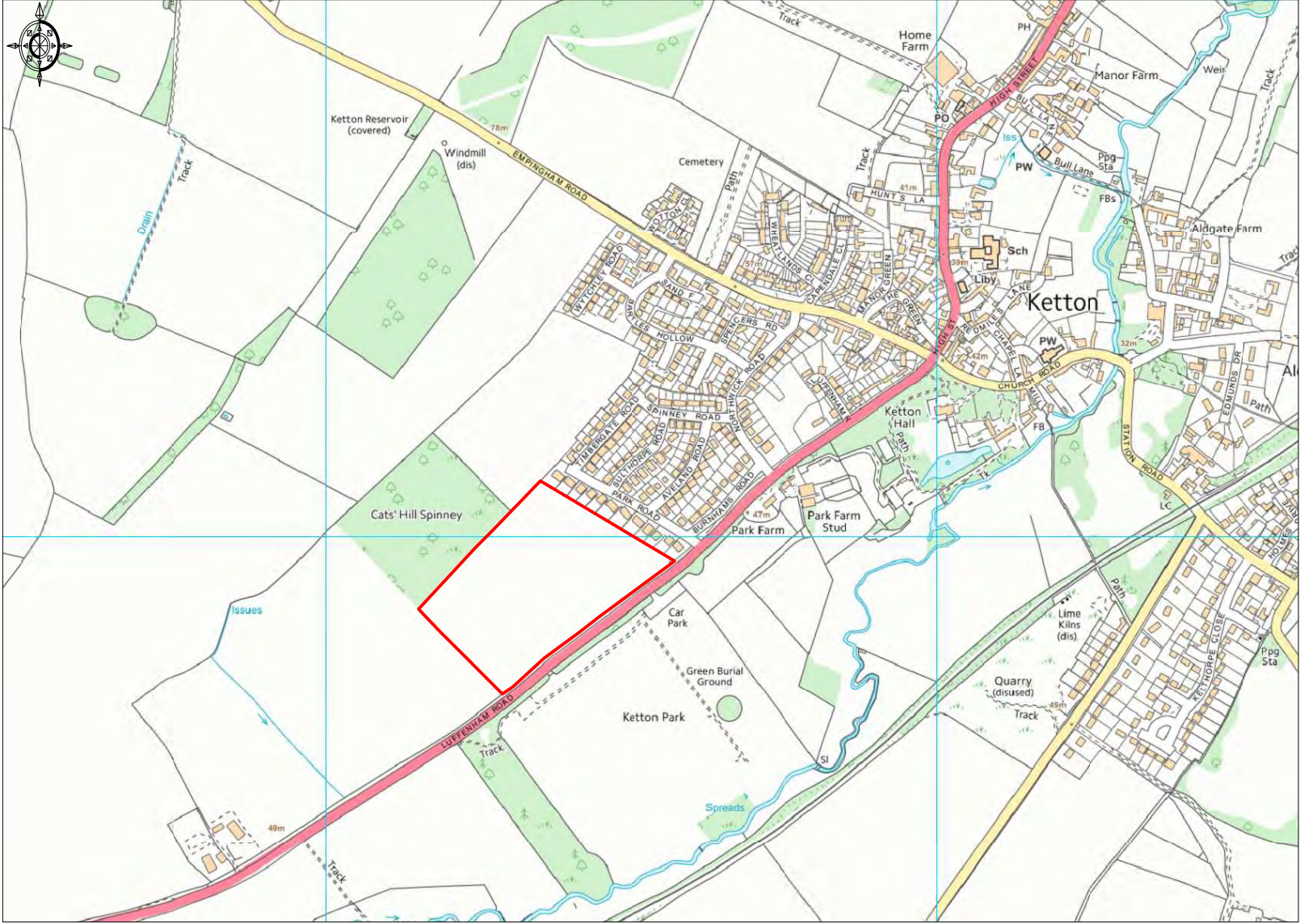
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Enc.



Appendix A – Site Location Plan

Land at Luffenham Road, Ketton



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