Ryhall & Belmesthorpe Parish Council Response to Regulation 18 Local Plan Consultation

Introduction

Ryhall & Belmesthorpe Parish Council [RPC] regrets the inadequate consultation period made available for responses to be gathered from its community. The timing running over the holiday period has not enabled sufficient or acceptable degrees of engagement. Despite mobilising a meeting and presentation in the local village hall, we believe many residents are not aware of the Plan's content or implications in order they have been able make informed representations.

Ryhall & Belmesthorpe Parish Council [RPC] is submitting its response to the Regulation 18 Local Plan consultation in the form of this document as it is felt the OpusConsult methodology, which only presents the opportunity to support or object to each individual section in turn, is a very unhelpful format as it does not permit more nuanced observations to its constituent policies as a whole.

OpusConsult requires responses on individual policies and doesn't easily permit cross-cutting observations on issues which span a number of inter-connected subjects.

It has been drafted by the RPC planning Sub-Committee and is submitted jointly by the Chair of the Parish Council and Chair of the Planning Sub-Committee as our agreed position.

This submission initially offers a considered overview representing RPC's general strategic observations on the proposed Local Plan and thereafter follows the Regulation 18 document's chapter headings in sequence and comments on each individually.

Overview

Rutland is a small rural unitary authority with little industry and is a predominately agricultural environment. Its population's age profile is significantly skewed to older people and this bias is set to grow further over the time span of the Local plan. There are few levels of highly concentrated dwellings [only 2 Market Towns] and the population is typically dispersed county wide in 52 villages and smaller hamlets. This is profound importance as it will shape the infrastructure and services required by the community in terms of housing, transport, education and healthcare.

For example, the provision of healthcare increases with age and yet there is only one small under-resourced and under-utilised hospital in Oakham with most secondary care having to be accessed out of county. Rutland is defined as a 'Place' within the structure of the NHS Health and Social Care system for Leicester, Leicestershire and Rutland whose policies and actions are dominated by the needs of the larger community of Leicester City which presents a radically different population profile. Central government direction to the NHS is to provide healthcare closest to home yet this is not being delivered in Rutland. Primary care is provided by only 4 practices who have seen stretching growth in patient numbers and demand, particularly caused by weak delivery

in Stamford causing patient migration to Empingham Medial Centre [EMC]. If the 650 houses proceed for the Quarry Farm/Monarch Park development, which is within the county, this would require development of a significantly enlarged EMC capability on a new site. The local plan is silent on this obvious need.

Rutland has low levels of unemployment and for people of working age many travel beyond the country borders for employment in neighboring towns and cities in Leicestershire, Cambridgeshire, Nottinghamshire, Northampton, Lincolnshire and Derbyshire. This argues against the need to expand local employment businesses which might negatively impact the character of the county; however, it does point to the need for greater attention on matters regarding Highways and Public transport. The 2019 Moving Rutland Forward -Fourth Local Transport Plan states that it is "*only at the beginning of the journey, and during the life of the plan a number of additional documents will be produced*". The MRF and Policy INF2Securing Sustainable transport is long on aspirational objectives yet short on specific deliverable plans. This is significant weakness in the Local Plan and cannot be '*made up as we go along*" during the Local Plan as seems to be suggested. It is a major gap in infrastructure management that needs to be addressed at the heart of our future planning.
The plans for Housing in Chapter 6 need a fundamental rethink. Leaving aside the irritatingly confusing numerics, there is no strategic recognition of the potential impact major developments in Woolfox and North Luffenham/St Georges Barracks [SGB] would have upon the necessity for character changing housing developments being forced upon small communities. RPC believes the rationale behind the compilation of a Reserve list is fundamentally flawed. Existing approved and already constructed housing developments mean that the aspirational annualised growth of 135 new houses [123 + 10% buffer] is not necessary to commence for the next 7 years … in which period clarity on the future of Woolfox and SGB would crystallize and obviate agreement at this stage to the concentrated growth of 225 houses in Oakham; 316 in Uppingham; 650 in Stamford North and of most importance to Ryhall, the 184 houses indicated for larger villages.

The Housing Policies were framed before the recent changes to the National Planning Policy Framework announced by central Government and needs to be remodeled taking into account the particular direction to avoid use of agricultural land and changes to the local character of communities. The current proposed development sites are not in accord with this direction and require reconsideration.

The plan is silent on the important issue of Policing. It is a fact that despite limited increases in numbers the coverage by police in the county remains sparse for the county's large areas to be covered, particularly at the eastern margins where co-operative working with neighbouring Lincolnshire Police appears to be poorly integrated. The A1 provides easy access for criminals out of area to make raids and escape undetected. Well sited Crime cameras on the main entry points to the county would have deterrent effect and assist in identification of culprits. Ryhall is uniquely exposed to the impact of poor liaison with Lincolnshire Police as the border is 1 mile to the south and east of the village and 2 miles to the north. Leicestershire Police HQ far to the west in Enderby is staffed by people without this geographic understanding and their incident management does not seem to include alerting Lincolnshire Police when events occur.

RPC's comments on the Strategic Policies contained in each Chapter.

1. Chapter 1

Clearly a Local Plan needs to consider a wide-ranging number of important policies as is indicated by the 10 chapters in the plan. However, RPC feels there needs to be a clearer assessment of which are most appropriate to the needs of the county and prioritisation of those most likely to impact the majority of the population. Our view is that most important are: -

- Housing

- Infrastructure [Health, Transport and Education]
- Climate Change & Environment

This is not to say the content of other chapters is unimportant, but in seeking to do everything is likely to lead to a failure to fully and satisfactorily deliver those that are most important.

2. Chapter 2 - Spatial Portrait

This is a good summary of the general issues impacting the geography and demographics of the county.
However, it needs to show much greater recognition of the fact that Rutland is not an island … it is significantly dependent on what happens across its borders in neighbouring counties as these are the primary providers of employment, healthcare provision and waste management. As such the section entitled "***Duty to Co-operate***" is insufficiently develop and requires greater development and enduring procedural systems emplaced to have a sustainable effect.
It needs to be significantly expanded to identify with greater clarity the specific actions that will be developed with our neighboring authorities. For Ryhall residents this particularly means joined up thinking with Stamford [South Kesteven/Lincolnshire] on Housing, transport, health and education. There are significant concerns about the deleterious impact of Quarry Farm/Monarch Park and the whole greater expansion of Stamford North. Without major improvement and expansion of primary care in Stamford and Rutland, the existing sub-optimal service will degrade to unacceptable levels. Quarry Farm/Monarch Park and the whole Stamford North expansion will profoundly impact local road transport and further aggravate the existing congestion on the A1621 where it joins Uffington Road caused by Stamford's concentration of grocery retail on the east of the town. RCC and South Kesteven Council must have a joined-up transport management plan to steer more traffic to the west of the town … possibly by building a Retail Park close to the A1.

3. Chapter 3 – Vision & Objectives

The preamble to this chapter defines a laudable list of aspirations …none of which will be realised unless backed up specific SMART deliverables. Bullet points 3 and 4 are the most important in the view of RPC and should be priority areas for initial concentrated activity.
As the listed Strategic Objectives are covered in greater detail in subsequent chapters of the Local Plan, our comments on each policy will be provided in our response to each of these.

3 Meeting Housing Needs - Support

4 A prosperous and resilient Local Economy - Support

5 Supporting Strong & Vibrant Communities - Support

6 Creating Safe, Inclusive and Resilient Communities - Support

7 Promoting High Standards of Design - Support

8 Protect and Enhance the Built and Natural Environment

The proposed development at Quarry Farm is contradictory to this strategy. This strategy already exists in the current plan; however, it would appear that this strategy has less priority than the housing need. What is the point of having Local Wildlife Sites if we allow them to be developed?? If RCC is to be considered a seriously in this respect, there should be no exceptions unless required through National Strategic Infrastructure Project.

9 Make Effective Use of Land & Resources - Support

10 Ensure Development is Supported by Essential Infrastructure

The background information re population size, age demographics etc. are noted. How is this to be achieved? We see lots of detail with regard to Housing Allocation, but nothing on further infrastructure provision?

4. Chapter 4 -.Climate Change

More detail required, not a strong enough statement (no mention of RCC stated confirmation that we are in a Climate Crisis.
This is of critical importance, particular to our young generation who have no voice.
Consideration should be given to incorporate further re NPPF Chapter 13 Protecting Green Belt Land, i.e., further define our Greenbelt Areas, particularly in relation to para 143, 149, 150 and 152.

No mention of renewable energy, heat pumps - Appreciate that this may come under the Climate Resilient, however feel that our LP should be more prescriptive, than general. We need developers to be under no doubt as per the standards required. It is understood that heat pumps are installed under the planning system with a noise assessment. It seems unacceptable to Ryhall Parish Council that they can be installed only 1m away from their neighbours and have a maximum decibel of approx. 42 (about the noise of a washing machine. However, one does not have a washing machine on all the time and we tend to have washing machines indoor! These guidelines must be revised as they are unacceptable.

There is not enough emphasis on improving existing energy efficiency in buildings or utilities (e.g., street lighting). We have to improve performance to achieve Net Zero across the county.

CC1 Supporting a Circular Economy - Support
CC2 Design Principles for Energy Efficient Buildings – only Support if there's clarity as to what standard is being used to measure the "highest possible energy efficiency standards?

CC3 Resilient and Flexible Design - Support
CC4 Net Zero Carbon (operational) – only Support subject to a change so that new proposals must [not should] provide Net Zero. Surely this "Should" must be changed to "Must"?
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CC5 Embodied Carbon - Support
CC6 Water Efficiency and Sustainable Water Management - Support
CC7 Reducing Energy Consumption in Existing Buildings – Support

CC8 Renewable Energy Generation - Support in General, with exception as below.
We are awaiting a decision re Mallard Pass Solar Farm, which has gone through a lengthy process. We support Solar Panels on Roofs and on Industrial Building but cannot support on Greenbelt Land. The Carbon Footprint over the lifetime of the project is huge and cannot be offset. Would rather have wind turbines.

CC9 Protecting Renewable Energy Infrastructure - Support
CC10 Wider Energy Infrastructure - Support
Concerns with regard to battery life, waste and recycling. Presently not been properly addressed.

CC11 Carbon Sinks - Support
The land at Quarry Farm is a Natural Carbon Sink in direct contravention of this policy

CC12 Carbon Sequestration - Support
Again, must reference Quarry Farm which is in direct contravention of this policy.

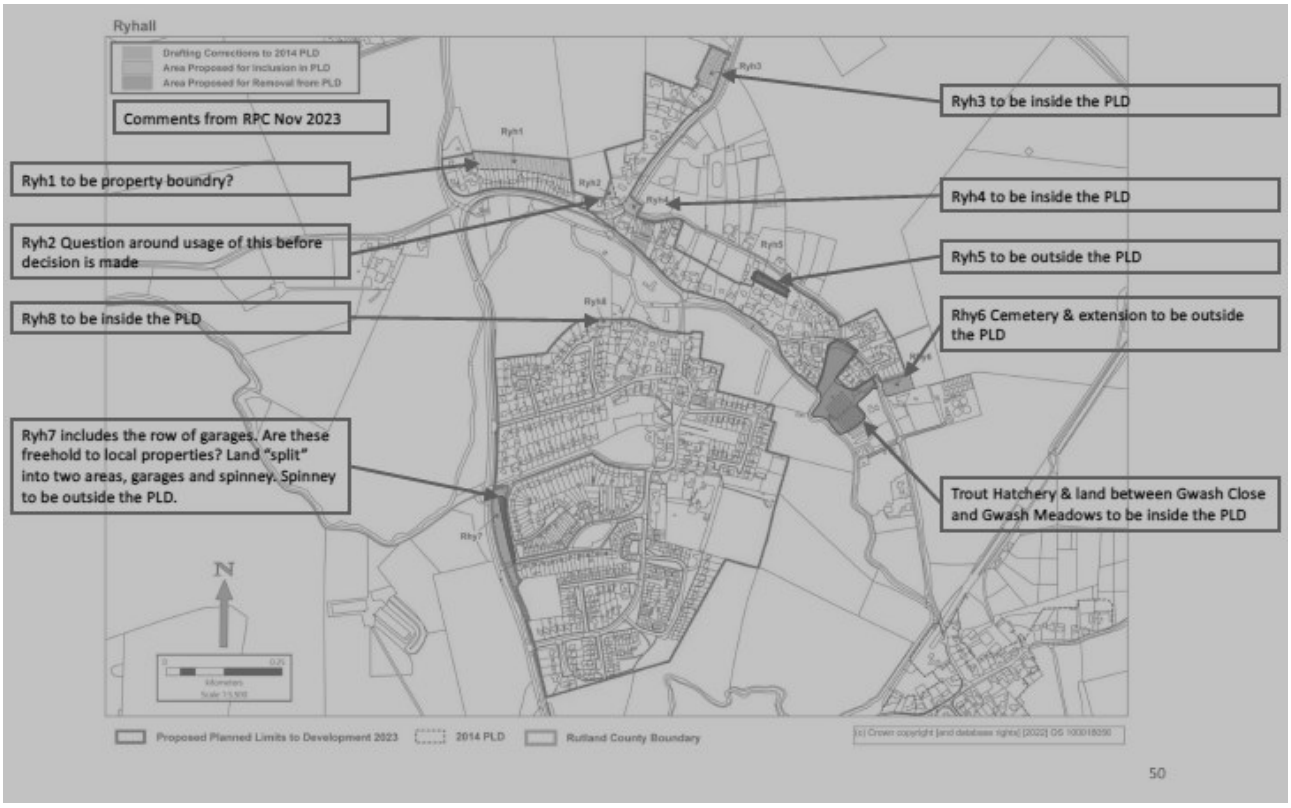
CC13 Sustainable Travel - Support
Would also recommend that mobility scooters are also provided for (given the age demographic)

CC14 Flood Risk -Support RRC should now recognise that existing model for flood defence is now obsolete and need to consider more rigorous survey work. What was considered as one in a hundred-year events are now more like one in every 3 years as climate change takes hold. Clogged ditches and gullies in Ryhall's Back Lane and Belmesthorpe Lane/Shepherd's Walk have been the cause of significant localized flooding and RCC needs to invest in preventative clearing these to ensure they function as required. Liaison with Anglia Water on a long-term issue in Foundry Road is illustrative of poor attention to this important preventative issue.

5. Chapter 5 – Spatial Strategy

SS1 Spatial Strategy for New Development. Ryhall's comments with regard to proposed PLD

a) RHY1 - To be on Property Boundary
b) RYH2 - Please confirm why this small parcel has been placed within the PLD?
c) RYH3 - Request to be inside the PLD
d) RYH4 - Request to be inside the PLD
e) RYH5 - Request to be outside the PLD
f) RYH6 - Request to be outside the PLD
g) RYH7 - Includes row of Garages? Are these freehold to the local Properties? Land "split" into two areas, garages and spiny to be outside PLD
h) RYH8 - Request to be inside the PLD
i) Also Request Trout Hatchery & Land between Gwash Close and Gwash Meadows to be inside the PLD (see attached)



We offer a general comment on PLD issues … that is not having a PLD for Smaller Villages may have the unintended consequence of encouraging individual development of large 'prestige' detached properties which can change the identity of that community. We recommend all smaller villages should have a defined Planned Limit of Development.

SS2 Requirements for Planning Applications - Object

Would comment that any development at Stamford North is an agreed Masterplan and submitted as a joint application. Any development proposed on the cLWS should not be permitted, and alternative options are available.

SS3 Development within Planned Limits of Developments - Support

SS4 Infill and Rounding off Development in Smaller Villages - Concern

Smaller restraint villages without the protection of PLD will only embolden developers. PLD should remain.

SS5 St. Georges Barracks Opportunity Area - Support

This is a brownfield site and presents the most sustainable site for Rutland as completely in line with NPPF Planning Policy for large housing development. It is noted that we are not presented with such a comprehensive site masterplan for Quarry Farm. We note the John Associates report, re the calcareous grassland, and would support proper development and protection of these areas as SSSI's. The same protections should apply as per our Biodiversity action plan to all of these rare habitats. This policy should be robust in order that developers are in no doubt about our environmental priorities.

SS6 Use of Military Bases and Prisons for Operational or other Purposes - Support
SS7 Reuse of Redundant Military Bases and Prisons - Support
SS8 Residential Development in the Open Countryside - Support
SS9 Non-residential Development in the Countryside - Support

SS10 Conversion of Buildings outside PLD's - Support
SS11 New Agricultural Buildings - Support

6. Chapter 6 – Housing

There seems to be a confusing divergence in the numbers of new houses required in the Plan and greater accuracy of what is being proposed is required before this chapter can be accepted … therefore Ryhall Parish Council object to it in toto.

The Plans states that the total number of houses needed in Rutland is equivalent to an addition of 123 per year …this equates to a total of 2460.

But a 10% 'Buffer' is stated as being included taking the total to 2706 [actually the plan says 2705 and this variation is not explained] which equates to 135.3 per year.

However, earlier commitments since 2018 are taken into account meaning additional sites for 1358 new houses been identified.

Quarry Farm/Monarch Park, if it goes ahead, will contribute 650 to this total reducing the new sites needed to 708

However more detailed numbers about where these houses are to be located are provided in Table 4 and on pages 80/81 which neither match this calculation or even agree with each other!

It is stated in these two references as being:-

	Table 4	Pages 80/81
Oakham	**183**	**225**
Uppingham	**316**	**316**
Larger Villages*	**153**	**184**
Small Villages/Hamlets with no PLD	**45**	**Nil**
Sub-totals	**697**	**725**

The numbers don't add up … either 11 houses short or 17 too many when compared with the 708 new houses apparently illustrated in previous enumeration statements!

Clarity and exactitude are needed before this chapter can be accepted.

H1 Quarry Farm - Object
Greenfield / cLWS / Carbon Sink / Priority Habitats. NPPF 142/143/181/188.

Reserve Site H1.f Meadow Lane, Belmesthorpe Road, Ryhall - Object
Greenfield Site, Archaeological and Flood Risk. NPPF 142/153
Ryhall Parish Council have already submitted a substantial objection to the development of this site. Furthermore, we understand an application for development on this land has already been submitted so we are at a loss to understand how it can be regarded as a 'reserve' site if it is already under consideration as an active proposal.

H2 Cross-Boundary Development Opportunity - Stamford North - Object
H3 Housing Density - Support
H4 Meeting all Housing Needs - Support
We note the Housing Market Assessment Report 2023 concluding that there is an annual need for an additional 78 traditional affordable housing units per year. How would this be achieved given that we would require well over 50% of planned housing to be affordable within our stated Housing need. Secondly given the ageing population demographic, it would also seem logical to provide more detail on over 60's housing needs. Given that affordable housing is not considered viable on small scale development, how does RCC intend to manage this strategy?

H5 Accessibility Standards - Support
H6 Self Build & Custom Housebuilding - Support
H7 Affordable Housing -Support
Note comments on H4
H8 Rural Exception Housing - Support
H9 First Homes Exception Sites - Support
H10 Meeting the Needs of Gypsies - Support

7. **Chapter 7 – Economy**

Policies E1 - Sites for Employment- Support

The poor quality land on Great North Road side of Quarry Farm should be considered as a Retail Park, in order to help reduce traffic congestion in Stamford, allowing residents living on the west side of town to be able to have a local centre, alongside the current garage and garden centre and other businesses.

E2 Employment Development on Unallocated Sites - Support
E3 Protecting existing Employment Land & Premises - Support
E4 Rural Economy - Support
E5 Sustainable Farm Diversification - Support
E6 Employment & Skills - Support
E7 Fibre to Premises (FTTP) - Support
E8 Local Visitor Economy - Support
E9 Caravans, Camping Lodges, Log Cabins, Chalets & Similar Forms of Self-Serviced Holiday Accommodation - Support
E10 Town Centres & Retailing - Support
E11 Primary Shopping Areas - Support
E12 Retail in Neighbourhood Centres and Larger Villages - Support

8. **Chapter 8. - Sustainable Communities**

Delivering Sustainable Development

Again, more detail required - vague and no stated objectives ref Chapter 2 - Achieving Sustainable Development, Para 8 a) Economic Objective, b) Social Objective and c) Environmental Objective.
Policies SC1 Landscape Character - Generally Support

Concern with regard to our own Settlement Edge. Will not support any further development between Ryhall and Belmesthorpe on the Belmesthorpe Lane, and Meadow Lane Ryhall. The PLD should be regarded as immutable for the duration of the Local Plan

SC2 Place Shaping Principles - Support

SC3 Promoting Good Quality Design - Support
Our villages were never designed for the cars! Street Parking is a problem, and should also be a consideration in extensions within existing properties.

SC4 Pollution Control - Support
SC5 Designing Safer & Healthier Communities - Support
SC6 Community Facilities - Support
SC7 Creation of New Open Space - Support
Not at the expense of valuable and diverse priority habitats.

9. **Chapter 9 – Environment**

EN1 Protection of Sites, Habitats and Species - Support

Again, must refer to Quarry Farm proposal in direct conflict with this stated Policy. Calcareous grassland SSSI on Gt North Road. Quarry Farm has acres of this rare habitat. Should also be considered for SSSI status, and protected as per LLLR Biodiversity Action Plan.

EN2 Local Nature Recovery Strategy - Support
Ref Quarry Farm

EN3 Biodiversity Net Gain – Support

EN4 Trees, Woodland, and Hedgerows - Support
Would RCC go further and not allow any cutting/trimming of Hedgerows until the following New Year. Cutting earlier often means starvation for many wild birds.

EN5 Ancient Woodland & Veteran Trees - Support
EN6 Protecting Agricultural Land - Support
EN7 Green & Blue Infrastructure - Support
EN8 Important Open Space & Frontages - Support
EN9 Local Green Space - Support
EN10 Rutland Water Area - Support
EN11 Eyebrow Reservoir - Support
EN12 The Historic & Cultural Environment - Support
EN13 Protection of Heritage Assets - Support

10. Chapter 10 – Minerals & Waste

MIN1 - Spatial Strategy for Minerals Development - Support

Noted “Clay extraction is permitted at Lt Casterton (Williamson Cliff). Operation currently active and of a small scale with the site worked only a few times a year. Fireclays from the site are exported and used in the making of a specialist brick - Lt Casterton facing brick that is used to repair listed buildings”

This again conflicts with H2 Quarry Farm??

MIN2 - MIN9 - Generally Support
WST1 - WST3 - Generally Support

11. Chapter 11 -.infrastructure & Delivery

INF1 - Infrastructure & Connectivity - Support

CIL /106 to be Replaced with Infrastructure Levy - Update Required??
Infrastructure requirements should be confirmed and agreed before permission granted for any development. This is the single biggest concern of residents.
Our view is NO INFRASTRUCTURE - NO DEVELOPMENT PERMISSION
Health, Education and transport issues already under stress will only worsen significantly if the population grows as indicated by the growth in housing. This section MUST address the provision of improved infrastructure otherwise the whole plan lacks credibility.

INF2 - Securing Sustainable Transport – Support

INF3 Walking & Cycling - Support

Speeding is a major concern for residents in our villages and country lanes. There will be may residents who will not take up this option, unless safety concerns are properly addressed.

12. Appendices

Our general comment is that a large number of these subsidiary policies need careful review to check they are up to date and consonant with the NPPF. The time available for Regulation 18 consultation has not permitted RPC to undertake this task and we therefore urge RCC to ensure they are reviewed during the Regulation 19 Stage .