

Representation No. 4 on Delivering Quality Homes Chapter 5 Policy H6

Legal yes

Sound No

The Plan has not been positively prepared to meet Rutland's objectively assessed housing need. The housing numbers have been manipulated to accommodate the large new settlement at St Georges Barracks (SGB). The proposed buffer is understated and the reasoning for it flawed. Affordability problems are worsened not met by concentrating such housing at SGB. Social housing is not mentioned at all.

Comment

The Government's preferred methodology to calculate housing need is 127 dwellings p.a. In the 18 year period 2018 to 2036 this totals 2286 dwellings. Over the same period RCC are planning 2942 dwellings, a buffer of 29% not the 25% the Council claims.

The justification is that planning for new dwellings above the 2286 preferred by the Government would be too limiting and push up house prices beyond the reach of local people, although there is an affordability component in the Government's model. There is no justification for the figure of 25% or what impact the Council think such a buffer would have on local house prices. Why not 15% or 50%. Also the very small

geographical area of Rutland does not constitute a housing market. We draw the inference yet again that evidence is being concocted to justify the provision of 2215 dwellings, plus another 100 on the officers mess site, at SGB.

The Council have played fast and loose with the windfall provision and its impact on housing numbers throughout the Plan period. In 2017 the Council carried out a windfall study that concluded that 34 dwellings per year would be a reasonable and conservative estimate to include in the housing need calculations. The actual windfall numbers have been running at around 50 for the last few years. Within a year of their own study, June 2018 Cabinet report on SGB and in the first iteration of the SGB Masterplan, windfall numbers were reduced to zero. The Council's consultants obviously realized this was untenable, and reinstated windfall to 20 dwellings per annum. There is no reasoning attached to this number. Using the Council's own study figure of 34p.a. would increase the dwelling figures by 252 in the plan period and the buffer to 40%. If we include the 605 dwellings at Stamford N., which will be built in Rutland, then the buffer increases to 66%. It is very difficult to draw any conclusion other than the Council continue to manipulate figures to justify the large numbers at SGB.

This conclusion is reinforced by the derivation of the 2215 houses proposed for SGB. The Memorandum of Understanding between the MOD and RCC signed September 2017 stated that they would "jointly develop" the site with between 1500 and

3000 dwellings. The higher figure would of course have satisfied all of the housing requirements to 2036 identified in the 2017 Plan. The 2215 was not drawn from a calculation of what Rutland needed, it emerged from a viability study carried out by MOD consultants as to the minimum required number of dwellings they were prepared to see on the site taking into account their costs and income requirements. This number emerged at a Parish Council Liaison Group meeting, but requests for the figures behind it were refused. At the time of the HIF debate the MOD representative threatened that if the HIF bid were not supported then they would revisit the 2215 number, with the implied threat that it would be increased. In simple terms Rutland's numbers are being dictated by the MOD with the acquiescence of their junior partners RCC.

The build out rate for the site gives 100 dwellings per annum over the Plan period. This is supported by evidence which is reasonable. The Transport calculations are based on 178 or 200 dwellings per annum according to our transport consultant. Public comments by the MOD have been made to the effect that they expect the whole of the site to be developed in the Plan period. The viability assessment numbers have not been checked, but it would be desirable to fix on a common figure.

The Council have made much of the fact that the airfield is brownfield land, and certainly in many public meetings have asserted that therefore it must be developed. The common perception is that brownfield development is a protection

against unwarranted intrusion into greenfield on the edge of our major towns and cities. Where the brownfield is itself in an isolated rural situation then other factors come into play. The Council's quotations in the Plan of para 117 of NPPF that as much use as possible must be made of brownfield, do not mention the caveats, that that is unless they conflict with other policies in NPPF, sustainability of this isolated rural location for one obvious conflict. Brownfield land must not be built on or as a first call.

The Council have again in many public and Council meetings referred to SGB as a major contributory factor to addressing the problems of affordability of housing. This is reiterated in para 5.15 of the Plan. Ignoring the fact that affordable does not mean affordable to a low income family in Rutland. Strategic aim 1.3 in the latest Corporate Plan was to develop a definition of affordable for Rutland by October 2019. Never done.

Affordable policy compliance is also of course not site specific, the 30% affordability policy at SGB, much trumpeted, can apply to any site over 10 dwellings.

It is a drawback concentrating affordable housing in an isolated rural situation. Low income families want and need to be near the facilities of our towns and larger villages as the Sustainability Appraisal suggests. An isolated car dependent settlement, especially with a lengthy development period before any critical mass supported infrastructure, will

exacerbate affordable housing problems in Rutland, not positively contribute as the Plan asserts.

There is no mention whatsoever in the Plan of what is commonly called social housing. Housing for rent which low income families can truly afford. The rental structures assumed in the MOD calculations of their reasoning behind 2215 dwellings has never been made public.

Mitigation measures to ensure soundness

Re visit the sites which disappeared on the edge of our towns and villages and large centres which disappeared to accommodate SGB, include Stamford N. in the Rutland calculations and provide for a buffer zone of no more than 10% which given Rutland's recent history is more than adequate. This will result in SGB being developed on a Rutland scale.