

PRE-SUBMISSION LOCAL PLAN REGULATION 19 REPRESENTATION RESPONSE BOOKLET

Guidance Note

These notes are intended to assist you in making representations to Rutland County Council's Pre-Submission Local Plan. At this stage of consultation, the Council is seeking views on whether the Local Plan is legally compliant and meets the tests of 'soundness', as set out in the National Planning Policy Framework (NPPF), and summarised in the boxes below.

Legal Compliance

- The Local Plan should have been prepared in accordance with the Council's latest Local Development Scheme.
- The Local Plan should be accompanied by a Sustainability Appraisal and Habitat Regulations Assessment.
- Consultation on the Local Plan should have been carried out in accordance with the Council's Statement of Community Involvement.
- The Council should have worked collaboratively with neighbouring authorities and prescribed bodies on strategic and cross boundary matters, known as the Duty to Cooperate.
- The Local Plan should comply with all relevant laws including the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012.

Soundness

- **Positively prepared** - provides a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- **Justified** - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.
- **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.
- **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies including the National Planning Policy Framework.

General Advice

- This booklet has four parts:
 - Part A – Contact Details
 - Part B – Your Representation
 - Part C – Future Notifications and Privacy Notice
 - Part D – Other Monitoring Information
- You must provide your contact details within Part A of this booklet. We are unable to accept anonymous representations. The name of respondents and the representations made will be made available on the Council's website. Personal information such as telephone numbers, addresses, and email addresses will not be published. By submitting a representation you confirm your agreement to the publication of your name and consultation response.
- Please do not include any personal information within Part B of this booklet. All comments submitted as part of this consultation will be made publically available in reports and online.

- Comments which are deemed to be unlawful or discriminatory will be inadmissible and will not be accepted. We would ask that you avoid the use of such comments when making your representations.
- You will need to fill in a separate Part B for **each representation** that relates to a different part or issue of the Local Plan. This booklet contains five sets of questions in Part B for you to make five separate representations. Should you wish to make more than five separate representations please use additional booklets.
- You should be as concise as possible when making your comments.
- Where there are members of a group who share a common view on the Local Plan, a single representation will be sufficient. In such cases the group should indicate how many people it is representing and how the representation has been authorised.
- Responses must be received by the Council no later than 4.15pm on Friday 6th November 2020.

Part A – Contact Details

Please tick as appropriate:

- Responding as an individual (complete section 1)
- Agent responding on behalf of a client (complete sections 1 and 2)
- Responding on behalf of an organisation (complete section 2)

1. Individual/Client Details (Please complete in block capitals)	
Title	<input type="text"/>
First Name	<input type="text"/>
Last Name	<input type="text"/>
Address Line 1	<input type="text"/>
Line 2	<input type="text"/>
Line 3	<input type="text"/>
Line 4	<input type="text"/>
Postcode	<input type="text"/>
Tel. No (Daytime)	<input type="text"/>
Email	<input type="text"/>

2. Organisation/Agent Details (Please complete in block capitals)	
Title	<input type="text" value="mr"/>
First Name	<input type="text" value="Neil"/>
Last Name	<input type="text" value="Newton"/>
Job Title/Dept	<input type="text" value="Councillor"/>
Organisation	<input type="text" value="Empingham P.C."/>
Address Line 1	<input type="text" value="30 Audit Hall Rd"/>
Line 2	<input type="text" value="Empingham"/>
Line 3	<input type="text" value="Rutland"/>
Line 4	<input type="text"/>
Postcode	<input type="text" value="LE158PH"/>
Tel. No (Daytime)	<input type="text" value="01780460122"/>
Email	<input type="text" value="Neil.newton3@btinternet.com"/>

Part B – Your Representation

Important note: You must complete a separate Part B for **each representation** that relates to a different part or issue of the Local Plan. Part B contains five sets of questions for you to make five separate representations. Should you wish to make more than five separate representations please use additional booklets.

Representation 1

1. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph Number	3.1 Vision and Objectives
Policy Number	
Table Number	
Figure Number	
Appendix	
Policies Map Reference	

2a. Do you consider the Pre-Submission Local Plan to be legally compliant?

Yes

No

2b. If you responded no, please provide an explanation below (See Guidance on Page 1)

The progression of the Local Development Plan is an iterative process, regulation 18 consultation leading to a Regulation 19 pre submission Plan.

The so called focused consultation on St Georges Barracks(SGB) in August 2018 introduced a very fundamental shift in the proposed spatial strategy to that widely consulted on in 2017 and widely accepted in the 2017 published draft Plan. The long standing spatial strategy of organic growth concentrated on our two towns and the larger villages was overturned to concentrate growth on a new garden village. This was such a fundamental shift it was in effect an entirely new Plan and should have been accompanied by a new and radically revised sustainability appraisal as required by the NPPF. The Sustainability Appraisal accompanying this Reg 19 pre submission Plan was prepared long after Reg 18 consultation, contrary to the requirements of the NPPF.

A fundamental requirement of The Local Plan is that it has community backing after consultation . Since the very clandestine signing of the Memorandum of Understanding with the MoD in 2017, evidence has been collected and slanted to ensure the Local Plan submission fits the requirements of that Memorandum, not a Plan based on the wishes of the local population. The wording of subsequent documentation “we will jointly develop(with the MoD) SGB with between 1500 and 3000 houses”,in the MOU.” Planning permission will be granted “ in the first iteration of the SGB masterplan.The numerous innacurate public statements regarding infrastructure and affordable housing for example, all lead to the conclusion that SGB was a fait accompli from 2017 without any early or effective public engagement as required by the NPPF.

3a. Do you consider the Pre-Submission Local Plan to be sound?

Yes

No

3b. If you consider the Pre-Submission Local Plan to not be sound, please select which test(s) of soundness this relates to? (See Guidance on Page 1)

Positively prepared

Justified

Effective

Consistent with national policy

3c. Please provide an explanation below.

A very fundamental tenet of national policy is community involvement and support for their place. NPPF para 16c “The Local Plan should be shaped by early , proportionate and effective engagement between plan makers and communities” The following demonstrates that RCC singularly failed in this regard rendering this Plan unsound.

The RCC peer group review in November 2019 found the major weakness of the Authority to be that they communicated , but did not consult. Key recommendation 1 **Develop mechanisms to facilitate continuous community engagement that is more than consulting on options, builds assurances and transparency around future plans to win hearts and minds.**

The Vision Statement in this Plan is testimony to that conclusion. The last time the Council effectively consulted on a vision for the County i.e. what sort of place do Rutlanders want for their future, was 2008. The vision statement that emerged was widely endorsed. This vision was supposed to be reviewed every 5 years, never done. There were some changes at a Cabinet meeting in October 2010 to align a slightly revised vision with a new Corporate Plan, with a four week consultation period. Since then various vision statements have appeared without any consultation whatsoever.

Throughout the various preparation stages of this pre submission Plan various vision statements have appeared, none consulted on.

Para 3.6 of Chapter 3 states that the “vision has been developed by the Council together with partners and stakeholders.” We strongly challenge the veracity of that statement. As a parish council we are named stakeholders in the Statement of Community Involvement, but we have no recollection or minutes as to our involvement in the Vision statement..

Para 3.6 goes on to say that the vision also reflects the vision set out in the Council’s Corporate Plan (2019-2024). That Plan was published in November 2019 i.e. well into the first year of that Plan , but more importantly well after the Reg 18 consultation had finished when stakeholders could make meaningful comments. Moreover the very first strategic priority of that Corporate Plan was to consult residents on a 50 year vision for the County. This was supposed to commence in November 2019 and be finished by March 2020. Needless to say no evidence of any work on this strategic priority has emerged. In any event what is the point of such consultation when the future of Rutland has largely been determined by the emergence of the pre submission Reg 19 Plan in December 2019.

The fine words about community involvement are a sham, with no substance, a clear breach of national policy. The reality is that the Leadership and officers cut and paste various inanities to suit.

The emergence of the plans for SGB are another striking example of the Council’s disdain for public engagement. In June 2017 the Council published a version of a new Local Plan which was widely endorsed. See comments on the Council’s website. Before the ink was dry the Council secretly drew up a Memorandum of Understanding with the MoD to jointly develop the redundant site. The bland announcement that the Council were in discussion with the MoD over the site closure was a long way from agreeing a proposal to jointly develop it. The MOU was signed under a supposed delegated authority by the Chief Executive, currently under challenge, but even to pretend that an officer can be allowed such authority to fundamentally change Rutland is ludicrous. It was kept under wraps because the leadership were fearful of the public response.

4. Please set out the modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and/or sound, including any revised wording.

The current Plan should be withdrawn and residents properly consulted , with simple wording, not bombarded with planning jargon . References to spatial strategies and policy numbering requiring a detailed reading of a complex document are designed to put people off. The very simple question to put to Rutlanders is; do you want a new Garden Village on which future growth of the County will be concentrated, or do you wish future growth to continue to be centered around our towns and larger villages.

5. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
 Yes, I wish to participate at the oral examination

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

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Representation 2

1. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph Number	
Policy Number	SC2 Sustainable transport
Table Number	
Figure Number	
Appendix	
Policies Map Reference	

2a. Do you consider the Pre-Submission Local Plan to be legally compliant?

Yes

No

2b. If you responded no, please provide an explanation below (See Guidance on Page 1)

(Continue on a separate sheet if necessary)

3a. Do you consider the Pre-Submission Local Plan to be sound?

Yes

No

3b. If you consider the Pre-Submission Local Plan to not be sound, please select which test(s) of soundness this relates to? (See Guidance on Page 1)

Positively prepared

Justified

Effective

Consistent with national policy

3c. Please provide an explanation below.

Empingham Parish Council have contributed to the cost of engaging traffic consultants and their report is attached as an addendum to these representations .What follows is a laymans interpretation of why the Plan is unsound in a readily understood format which our residents can comprehend and on whose behalf we make these representations.

Section 9 of NPPF sets out Government expectations in this area and para 108 explains that when assessing sites for development such as SGB it should be ensured that;

- Appropriate opportunities to promote sustainable transport can be taken up given the type of development and it's location
- Safe and suitable access to the site can be achieved for all users
- Any significant impacts from the development on the transport network in terms of capacity/congestion can be cost effectively mitigated

This Plan fails these tests ,both locally and County wide.

Local Context

The Campbell Reith report para 11.5.23 states that the SGB development will generate significant traffic through Empingham to the A1 northbound. The report does not say that this will be exacerbated by the fact that the local junctions to the A1 from the A606 and A6121 are already overloaded and Highways England draw attention to the fact.The solution suggested for Empingham is in our view ludicrous. A new right turn off the A606 down Main St. This is an extremely narrow part of the A606 where two lorries cannot pass safely. The new middle lane shown diagrammatically, to a layman is impossible. There are no detailed drawings.

The Campbell report was published in November 2018, several months after the Reg 18 consultation closed. There was considerable opposition to the scale of SGB within the village and that would have been even more so if this traffic assessment had been available at the so called focused consultation on SGB in August 2018.

Main St. is a typical rural village main st, a horse and cart road. Many of the properties are of considerable age and do not have foundations or off street parking. There are already traffic problems because of the school and the doctors surgery which serves a wide rural area.The considerable demolition, construction and residential traffic generated by SGB will make these difficulties intolerable.

The usual mitigation measures such as pedestrian separation, widening pathways etc are impossible for large sections of Main St, especially where pedestrians are some six feet above street level. At the very least there should be an Environmental Impact Study for Empingham Empingham is a prime example of a number of villages which will be badly affected by a large new settlement decanting traffic onto an inadequate rural road system to connect to the primary network .

The traffic consultants report attached explores in some considerable detail the various inadequacies in the traffic assessment accompanying this Plan. To pretend that these can be addressed at the planning application stage is silly given the reliance on SGB for housing numbers. Unless of course the planning permission is considered a fait accompli yet again.

4. Please set out the modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and/or sound, including any revised wording.

The Plan submission should be paused until an adequate transport assessment and the cost of mitigating measures are produced.

5. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

Representation 3

1. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph Number	
Policy Number	H2 ST GEORGES GARDEN COMMUNITY
Table Number	
Figure Number	
Appendix	
Policies Map Reference	

2a. Do you consider the Pre-Submission Local Plan to be legally compliant?

Yes

No

2b. If you responded no, please provide an explanation below (See Guidance on Page 1)

Similar reasons to representation 1

The Reg19 Plan submitted is substantially different to the evidenced Reg18 Plan. The process is one of iteration. The Reg 19 version is not informed by the consultation and evidence of the Reg18 Plan. The Sustainability Appraisal attached to the 2017 consultation is not relevant to this Plan, and the Sustainability Appraisal attached to the Reg 19 Plan was not available for stakeholders to comment. There was an Interim Sustainability Assessment report written in August 2019 which only emerged at Council committee level in December 2019. According to the consultants who produced it the purpose of the Interim Report was “to gain stakeholders views on the relative sustainability merits of different spatial strategies in Rutland, **prior to Reg 19 consultation on the proposed submission version of the Local Plan**”. This was never circulated to stakeholders for wider debate. In other words the consultants realized the importance of a revised Sustainability Assessment, but their advice was ignored. The whole process is flawed and not therefore legally compliant.

3a. Do you consider the Pre-Submission Local Plan to be sound?

Yes

No

3b. If you consider the Pre-Submission Local Plan to not be sound, please select which test(s) of soundness this relates to? (See Guidance on Page 1)

Positively prepared

Justified

Effective

Consistent with national policy

3c. Please provide an explanation below.

The Plan is not positively prepared as it does not take account of the 650 dwellings to be built in Rutland north of Stamford. There is no Statement of Common Ground with neighbouring local authorities as required by para 27 of NPPF. See our representation on Policy H4 below for further detail. The numbers are excluded to accommodate the requirements of the MoD for a minimum of 2215 dwellings at SGB.

The Plan is not justified as it does not take account of reasonable alternative strategies. The inclusion of the 650 dwellings north of Stamford is an obvious alternative strategy not considered. Again see our representation on Policy H4 Stamford North.

Not consistent with national policy as SGB is one of the least sustainable sites considered, and the Reg18 consultation did not have a relevant Sustainability Appraisal applicable to SGB. As the traffic consultant's report identifies, walking and cycling to nearby settlements is very difficult or impossible without substantial investment. There is no buy in or capacity for local bus services to operate effectively, destinations will be diverse, and critical mass to sustain bus services will take years to reach. Vague words on pump priming local bus operations are just that, there is no detail on costings, frequencies, destinations, timetables. SGB will be almost totally car dependent, contrary to national climate change policies and the desire to reduce car journeys. The recent report on existing Garden Villages by TCPA states that they are all very car dependent commuter villages. SGB will join that number, especially given that 2215 dwellings is at the very low end of what is generally considered to be capable of self sustainability.

Not consistent with national policy as it does not have local support as required by NPPF. Despite the planning gobbledegook which cloaked the 2018 focused consultation on SGB, "do you agree the alternative spatial strategy", not do you want a new settlement half as big again as our second largest town. Over 1700 responses were received. For an Authority with a total population of less than 40,000 this is astonishing and over ten times the response to the 2017 draft Plan. There was a 95% rejection of the proposal. Such was the scale of the response that the Chief Executive blandly announced that she did not have the staff to analyse the responses. It was five months before the scale of the opposition was made public. Even then the Council could not resist skewing the response by publishing their own analysis of the Gilman survey. The lack of resources to respond to public objection did not of course lead to any suspension of joint working with Homes England and the MoD to develop the site.

The opposition by the public was almost replicated at Councillor level. The only time the previous Council got to debate SGB was by proxy when a possible HIF bid was mooted. It scraped through 12 to 11 with the Leader having to promise that any conditions would be debated by full Council before any HIF grant was accepted, still not done despite the importance of HIF to viability.

Since the illicit signing of the MOU with the MoD, the leadership have had a closed mind. The development will proceed whatever the public will and evidence to the contrary.

4. Please set out the modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and/or sound, including any revised wording.

The submission Plan is not sound as argued above, it should be paused and made sound by renewed public consultation after requisite sustainability and evidential deficiencies have been remedied.

5. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
 Yes, I wish to participate at the oral examination

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

Representation 4

1. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph Number	
Policy Number	Chapter 5 Policy H6
Table Number	
Figure Number	
Appendix	
Policies Map Reference	

2a. Do you consider the Pre-Submission Local Plan to be legally compliant?

Yes

No

2b. If you responded no, please provide an explanation below (See Guidance on Page 1)

(Continue on a separate sheet if necessary)

3a. Do you consider the Pre-Submission Local Plan to be sound?

Yes

No

3b. If you consider the Pre-Submission Local Plan to not be sound, please select which test(s) of soundness this relates to? (See Guidance on Page 1)

Positively prepared

Justified

Effective

Consistent with national policy

3c. Please provide an explanation below.

The Plan has not been positively prepared to meet Rutland's housing needs. The housing numbers have been manipulated to accommodate the minimum number of houses the MoD have said they will accept on the SGB site as part of their agreement with RCC.

The Government's preferred methodology to calculate Rutland's housing need is 127 dwellings p.a. In the period 2018 to 2036 that totals 2286 dwellings. Over that period RCC are planning for 2942 dwellings an over provision of 29% not the 25% the Council claim. The justification is that 2286 would be too limiting and push up prices beyond the means of local people. There is an affordability component in the Government's model. Also why 25% not 15% or 50%, it is a figure determined to accommodate SGB. The very small geographical area does not constitute a housing market to manipulate for local people, even if RCC had the power to do so and not developers.

The Council have played fast and loose with windfall throughout the Plan stages. The Council carried out a windfall study in 2017 and concluded a safe figure for inclusion in future numbers would be 34 p.a. In recent years they have been running at over 50 p.a.. In a very slanted report to Cabinet in July 2018 windfall numbers were reduced to zero as not to be relied on, despite their own study a year earlier. The sustainability consultants obviously recognized such a stance was not tenable and reinstated windfall at 20 p.a. There is no evidence to support this number. These numbers matter. Using the Council's own figure of 34 would increase dwelling numbers by 252 in the Plan period, and the over provision to 40%. Including the 650 dwellings to be built in Rutland, north of Stamford would increase the over provision to 66%. A totally unprecedented figure nationally. It is very difficult to draw any conclusion other than that the Council have manipulated the numbers to justify the large numbers agreed with the MoD for the SGB site. The 2215 dwellings at SGB did not emanate from a calculation of Rutland's housing needs as required by the tests of soundness, it emerged from a viability study prepared by the MoD for their own viability reasons

The Council have made much of the fact that the airfield is brownfield and therefore must be developed. Common perception of brownfield is that it is a protection against unwarranted intrusion into greenbelt around our cities. Where the brownfield is itself in an isolated rural situation different factors come into play. The Council's assertions do not mention the caveats that that is unless they conflict with other policies in NPPF e.g sustainability for one.

The Council have also continuously prayed in aid for SGB, affordable housing. Ignoring this is largely an arithmetical construct to local prices, rents and shared equity products not necessarily affordable to low income families in Rutland, affordable housing is not site specific. It can apply to any site over 10 dwellings. Indeed it is axiomatic that concentrating affordable housing at SGB will exacerbate problems of affordability because low income families will want to live in our major settlements, not in an isolated rural location.

There is no mention of the real shortage of housing category in Rutland, what was hitherto called social housing. Housing at rents local low income families can afford.

The same planning team at South Kesteven astonished their Councillors by advising that within a year of their Local Plan being approved, a non designated site must be approved for entry level homes. These same planners are silent on the entry level homes in Rutland.

4. Please set out the modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and/or sound, including any revised wording.

Re visit the sites around our larger settlements which disappeared between 2017 and 2019 to accommodate SGB. Include Stamford north in the Rutland numbers, provide a buffer zone of 15% which is more than adequate given Rutlands recent history. Develop SGB on a Rutland scale with some 350 dwellings which can be accommodated by existing infrastructure.

5. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

Representation 5

1. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph Number	
Policy Number	POLICY H4 STAMFORD NORTH
Table Number	
Figure Number	
Appendix	
Policies Map Reference	

2a. Do you consider the Pre-Submission Local Plan to be legally compliant?

Yes

No

2b. If you responded no, please provide an explanation below (See Guidance on Page 1)

Para 27 of the NPPF states that in order to demonstrate effective and ongoing joint working, strategic policy making authorities should prepare and maintain one or more Statements of Common Ground, documenting cross boundary matters being discussed. These should be produced using the approach set out in the guidance notes and be **publicly available throughout the Plan making process to provide transparency**. The guidance also makes clear that a SoCG also forms part of the evidence that is required to demonstrate that the Council has complied with the Duty to Cooperate. Although there is reference to a SoCG with respect to Stamford North, it is not in existence, not available to the public and not endorsed by the Council.

It is also our contention that given the impact on the A1 junctions and the local road network a SoCG should have been in existence with Highways England.

It is now too late to comply with para 27 requirements that SoCGs be publicly available throughout the plan making process

3a. Do you consider the Pre-Submission Local Plan to be sound?

Yes

No

3b. If you consider the Pre-Submission Local Plan to not be sound, please select which test(s) of soundness this relates to? (See Guidance on Page 1)

Positively prepared

Justified

Effective

Consistent with national policy

3c. Please provide an explanation below.

The gifting of the dwellings to be built at Stamford north to count in South Kesteven D.C. housing numbers fails the test of soundness by the failure to consider all reasonable alternatives. The lack of SoCGs also fails the test of effectiveness by not demonstrating joint working on cross boundary strategic matters.

The Duty to Cooperate in meeting the housing needs of other authorities is almost exclusively used in densely populated urban areas, where vacant land is at a premium. To pretend that a large rural area like South Kesteven cannot find sufficient sites within its boundaries to meet their objectively assessed housing need is risible. Their recently approved Local Plan shows a very large over provision of 18%. There is no argument that Stamford N. is a very sustainable location for new housing and that the authorities should cooperate over infrastructure. Indeed the housing in Rutland is needed to provide the wherewithal for that infrastructure. This does not mean RCC must cede the numbers.

The reasoning behind the decision is flawed. "As Quarry Farm site is required to enable the delivery of sufficient land to meet the housing needs of Stamford and SKDC the number of houses delivered on this site will contribute towards meeting SKDC Local Housing Need rather than Rutland" para 5.24. Stamford is a town Council, not a housing authority it does not have a housing need, and SKDC is a very large authority which does not need the numbers. The issue of where to count the numbers is purely a Rutland decision and the gift is simply because that counting the numbers in Rutland obviates any necessity for a large new settlement at SGB.

At the Issues and Options stage of the Plan in 2015 para 5.37 Stamford N. was mentioned. "Land in Rutland on the edge of Stamford could provide a relatively sustainable location for new development, being adjacent to a market town (albeit in a neighbouring authority's area). This could help to support the sustainable growth of Stamford **and reduce the requirement for new housing elsewhere in Rutland**" Quite. The reason for the change of heart, never discussed by RCC, can only be the impact on SGB. The first time there is a reference to the gift is a small footnote to a housing needs table in the slanted June 2018 Cabinet report already referred to "Assumes Quarry Farm will contribute to SKDC's annual requirement" again necessary to make SGB numbers look tenable in that table.

There is some history to this topic the Inspector should be aware of. From 2018 Councillor G Brown asserted on numerous occasions that Stamford N. numbers had to be counted in SKDC because of the SoCG. Councillor A Brown could not find the SoCG and searched SKDC website and found reference to a draft. In June 2019 SKDC Cabinet minutes refer to the draft, with a minuted incredulity that RCC would gift the numbers at Stamford N being built in Rutland. The Planning Officer shared with Rutland replied that that was a matter for Rutland, and it is also minuted that in any event SKDC did not need the site to meet their housing need. Why the same officer did not feel it necessary to raise the matter in Rutland can only be conjecture, but it would be reasonable to assume that arguing SGB would be damaged by counting the numbers in Rutland.

Councillor A Brown tried to propose a motion to Council in January 2020 to the effect that notice be given to terminate the SoCG in accordance with the draft he had seen, to general consternation because there was no SoCG. Council had to be adjourned for two weeks to find a form of words that the majority group could force through.

4. Please set out the modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and/or sound, including any revised wording.

The Plan be paused to allow the impact of including Stamford North numbers on Rutland's Local Housing Need to be discussed and consulted on.

5. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

6. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

(Continue on a separate sheet if necessary)

Please note: It is the Inspector that will determine the most appropriate way to hear those who have indicated that they wish to participate at the oral examination.

Part C – Future Notifications and Privacy Notice

Future Notifications

Please let us know if you would like us to use your details to notify you of any future stages of the Local Plan by ticking the relevant box(es):

- Submission of the Local Plan to the Secretary of State for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004
- Publication of the recommendations of the Planning Inspector appointed by the Secretary of State to carry out the independent examination
- Adoption of the Local Plan by the Council
- Future revisions to the Local Plan, new planning policies and guidance

How we will use your information

We will use your details to contact you regarding your comments on the Local Plan consultation.

In submitting comments to this consultation we are also required, under The Town and Country Planning (Local Planning) (England) Regulations 2012, to notify you of when the independent examination will take place. We will use the contact details you have provided to do this.

Please note: At the end of the consultation period, all comments will be made public and will be submitted to the Secretary of State, who will pass them to a Planning Inspector, along with the Local Plan and other relevant supporting documents. Your comments and name will be published, but other personal information will remain confidential.

Your comments will be reviewed by the independent Planning Inspector appointed by the Secretary of State to carry out the independent examination for the Local Plan. You may be invited to discuss your comments at the oral examination if you have expressed a wish to do so.

If you chose not to provide your data for this purpose, or ask us to erase your data, you will be unable to participate in the Local Plan process.

If you would like to find out more about how the Local Plan Team at Rutland County Council use your personal data please go to <https://www.rutland.gov.uk/my-council/data-protection/privacy-notices/planning-policy/local-plan/>.

Part D – Other Monitoring Information

We are asking for the following information so that we can ensure that the consultation has been accessible to everyone. We are required to do this by the Equality Act 2010. This is however an **optional** part of the form. Any personal data provided will not be published alongside your representation.

1. What best describes your gender?

- Male Female
 Transgender Prefer not to say

Prefer to self-describe:

2. What age group do you belong to?

- Under 16 years 16-24 years 25-34 years 35-44 years
 45-54 years 55-64 years 65-74 years 75+ years

3. Do you consider yourself to be a disabled person?

- Yes No

4. What is your sexual orientation?

- Bi-sexual Heterosexual Gay Lesbian
 Prefer not to say

5. What is your religion?

- None Christianity Judaism Islam
 Buddhism Sikhism Hinduism Other
 Prefer not to say

If other, please state:

6. What is your ethnicity?

- White British White Irish
 Gypsy or Traveller Travelling Showperson
 Any other White background Asian or Asian British: Bangladeshi
 Asian or Asian British: Chinese Asian or Asian British: Pakistani
 Any other Asian or Asian British background Black or Black British: African
 Black or Black British: Caribbean Any other Black or Black British background
 Mixed: White and Black African Mixed: White and Black Caribbean
 Mixed: White and Asian Any other background
 Prefer not to say

If other, please state:

Signature: neil newton

Date:3/11/20220

Please return this form to Rutland County Council no later than **4.15pm** on **Friday 6th November 2020**:

By Email: localplan@rutland.gov.uk

By Post: Local Plan Team, Rutland County Council, Catmose House, Catmose Street,
Oakham, LE15 6HP