

Proposed Deputation by Richard Camp, for presentation at the meeting of the Growth, Infrastructure and Resources Scrutiny Committee on Thursday 19th December 2019.

I have looked in some detail at the Spatial Strategy Background Papers which are being used to inform the preparation of the Local Plan update report.

Comments on PTTT Chartered Town Planner document dated August 2019, concerning Assessment of Proposed Strategic Development Sites at St George's Barracks and RAF Woolfox

1. Section 5.142 of the PTTT document recommends that, given the significant financial implications of delivering affordable housing and the implications for site viability, an independent assessment of the viability implications is recommended. In this respect, Appendix 39 of the PTTT document confirms that a more detailed and independent assessment of viability is required in relation to delivering a policy-compliant provision of affordable housing.

2. Section 6.12 of the PTTT document indicates that comprehensive Landscape Assessment and Landscape Visual Impact Assessment of St George's Barracks (SGB) has been submitted and broadly indicates that development could be satisfactorily assimilated into the landscape and that the potential impacts are capable of being mitigated. However, the PTTT document states that the Local Planning Authority should commission independent evidence from a suitably qualified and experienced professional to confirm whether the findings of the submitted reports are robust. This view appears to be supported by the document of **Bayou Bleuenvironment of August 2019** which provides advice to Rutland County Council on the Landscape Visual Appraisal by fabrik of April 2018.

3. Section 6.15 of the PTTT document states that analysis of transport assessment is beyond the skill-set of the author and recommends that independent assessment of the submitted transport evidence for SGB should be undertaken by a suitably qualified and experienced person and that this should determine whether the submitted transport assessment provides a robust and proportionate evidence base. In this respect, RCC has commissioned an **SGB Transport Assessment Review by Amey Consulting**, which is dated **July 2019**. This is a desktop review and a site visit was not undertaken. In section 3.4 of this report it is stated that traffic counts carried out by Campbell Reith in October 2017 (and upon which the most recent transport assessment was based) are acceptable.

I disagree with this conclusion. A Manton Action Group analyst has reported that traffic counts taken in October 2017, which is outside of the tourist season and thus not relevant to some five busier months of the year, cannot be used to support a reliable transport assessment. A more relevant transport assessment is necessary.

4. Section 6.18 of the PTTT document, in relation to Habitat Survey, states that Natural England will need to confirm that they are satisfied that the submitted evidence is proportionate and robust. In addition, the Habitat Regulation Assessment for St George's will need to address potential impacts on Rutland Water arising from the options.

5. Section 7.10 of the PTTT document confirms that some of the technical evidence such as viability, transport and landscape character at SGB require independent assessment by suitably qualified and experienced professionals in order to confirm the robustness of the evidence.

CONCLUSION: IT APPEARS ESSENTIAL THAT ACCEPTANCE OF THE HIF GRANT BY RCC AND THUS FURTHER DEVELOPMENT OF THE LOCAL PLAN SHOULD BE DELAYED UNTIL THE UNCERTAINTIES DESCRIBED IN SECTIONS 1-5 ABOVE ARE RESOLVED BY COMPLETION OF FURTHER APPROPRIATE WORK.

AECOM Interim Sustainability Appraisal for the Rutland Local Plan 2016-2036. July 2019.

On page 24, paragraph 3 it is stated that Edith Weston and North Luffenham are relatively small settlements and predominantly rural in character. Therefore, options which seek to deliver a larger sized garden settlement at SGB are more likely to remove a significant proportion of the rural gap between these two settlements, impacting upon their distinctiveness. *This questions the wisdom of a large development at SGB.*

On page 24, bottom paragraph, it is stated that development of the scale proposed for SGB 'has the potential to negatively contribute to the special qualities of the Landscape Character Areas.' *Again, this questions the wisdom of a large development at SGB.*

On page 27, paragraph 2, it is stated that the delivery of higher growth in the larger towns of Oakham and Uppingham through Options 1, 2 and 4 is likely to better support the use of sustainable transport modes than the other options, given that residents have good access to local services and facilities. It is also stated that directing growth to the main, most sustainable settlements through Options 1, 2 and 4 will help to reduce reliance on the private vehicle, having a positive effect on climate change mitigation. Additionally, it is noted that Oakham includes the only railway station in the county - which provides direct links to the east coast main line, Stansted Airport, Birmingham, and a limited twice daily service to London St Pancras. Increased development at Oakham is therefore likely to lead to positive effects in terms of encouraging the use of sustainable transport, providing sustainable access to employment, services and facilities outside of the county. *Again, this questions the wisdom of a large development at SGB. I could find no statement about the desirability of higher growth and thus increased footfall in Oakham and Uppingham, which would help to diminish the decline of high street shops.*

PTTP section 5.6 indicates that it is reasonable to assume that only around 1,200 houses could be delivered at SGB during the plan period, ie up to 2036. *Reading page 29 and onwards of the AECOM document has led me to suspect that the relatively slow delivery of 1200 homes at SGB up to 2036 would leave new residents 'likely to be reliant on the car to access a greater range of services and facilities on offer at the two main settlements' and possibly to a level of isolation as the new SGB development proceeds and before full facilities are available.*

The Amey document also notes the distance of strategic roads from the SGB site and the current lack of options for other modes accessible from the site. Also applicable to SGB would be junction over capacity, HGV traffic and the need for mitigation measures, again questioning the advisability of a large development at SGB.

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