

## **1. Deputation from Mr M Touchin on behalf of CPRE**

CPRE England is seriously concerned about the level of risk attending acceptance of the HIF Grant at this stage. It seems that the revised Local Plan must be adopted by March 22 to allow the money to be claimed, and that all work funded by the grant must be completed by March 2024. Work cannot start, however, until the Local Plan will have been adopted. Life has moved on since the plans were first set out and the timescales are now very tight to complete all the steps needed and to develop and deliver the infrastructure improvements proposed; the entire plan could easily be seriously compromised by any further setbacks or delays.

We see three key risks:

- First, in the light of the substantial weight of adverse comments on the Local Plan throughout its development and particularly against the submission version, it could well fail at the enquiry or, at least, require significant modification; this could put the Council in breach of the HIF Grant conditions. Although the plan was submitted for examination without significant amendments, professional advice which we have obtained, and which we have previously discussed with members of the Council, suggests that this is a realistic possibility.
- Secondly, the lack of vision: without a credible statement of vision for the county – something CPRE Rutland has been calling for – there can be no certainty that the local plan or, indeed, the infrastructure changes to be funded by the HIF Grant, will actually be appropriate. Life after the pandemic, furthermore, will inevitably be rather different to the context in which the assumptions underpinning both the local plan and the infrastructure proposals were agreed. CPRE Rutland and others have previously emphasised this point.
- And thirdly, the plan is dependent on the MoD relinquishing St George's Barracks and the DIO delivering the infrastructure proposed. The MoD might very well change its mind regarding vacating the site, delaying or even negating the redevelopment plans.

The cabinet briefing report to this meeting suggests that rejecting the grant would threaten the viability of the proposals for St George's Barracks, and could lead to the DIO seeking to impose additional and less affordable housing; that is as maybe but the viability of a development from the landowner's point of view is scarcely a material planning concern. As the Local Planning Authority, Rutland County Council should certainly not be allowing such inappropriate development. The report also suggests that such a move might prejudice the five-year supply of building land, reducing it to a level where developers would enjoy free reign. We would suggest that this risk could

easily be mitigated by reinstating some of the potential sites defined in earlier drafts of the local plan, and adopting a much reduced scale of development for St George's Barracks; proposals based on no more than about 350 homes, which have been put forward in the past, would still be feasible and would not require the infrastructure changes in question.

All plans carry a degree of risk, but we believe that the circumstances have now changed to such an extent since the current plans were conceived that the risks are now unacceptably high. A revised plan is needed, which does not depend on the HIF Grant and which can be shown to be much more closely matched to the future needs of Rutland. We believe that the grant should therefore be rejected and serious consideration given to a more appropriate and less risky plan for the county.

Malcolm Touchin  
Chair, CPRE Rutland  
Registered Charity Number 500480

## **2. Deputation by Richard Camp on behalf of Manton Parish Council**

In December 2018 I was in touch by email with the HIF Team of the Ministry of Housing, Communities and Local Government about the published eligibility criteria that must be satisfied prior to application by a local authority for a HIF Forward Funding grant. The HIF Team confirmed that bids should have support locally, including the involvement of local communities. I then provided the HIF Team repeatedly with evidence showing the lack of local support for the proposed St George's Barracks development and was informed that they would take this into account when judging Rutland County Council's HIF bid. When the HIF grant award to our local authority was confirmed, I tried to contact the same HIF Team member with whom I had been in touch, only to be informed that she had left the Team. I then received two letters from the MHCLG which suggested that the Council's HIF bid satisfied 'certain gateway criteria'. One of the letters used unclear wording which suggested to me that they might believe that there was a significant depth of support for the HIF bid locally. Importantly, it was also indicated that any deficiencies in the process could be addressed during the Local Plan examination. I have studied the more than 1000 recently published Representations responding to the submitted Local Plan, which together make up more than 7000 pages. They overwhelmingly confirm the lack of local support for the St George's Barracks proposals: fifteen Parish Councils or Meetings (including several not in the vicinity of SGB) find the SGB element of the Local Plan unacceptable and unsound, some also finding it not legally compliant, with only three Parish Councils supporting the SGB proposals. This shows that the MHCLG either did not adhere to its own declared conditions relating to eligibility for HIF grant

applications or may have been misled regarding local support. This brings into question the soundness of the process here.

Furthermore, Rutland residents have not been permitted to see the Council's original HIF bid, nor the recent extensive documentation (even carefully redacted versions) that outline the outcome of a year's legal wrangling between the Council, Homes England and the MOD.

We hope that many Councillors will appreciate that these processes are a risk to proper democracy in the handling of public money, and do not deserve a vote in favour of HIF grant acceptance.

A Representation submitted on behalf of the Secretary of State for Defence also judges the Local Plan to be unsound and at one point requests that it is amended to state that Local Plan Policy H3 relating to development at SGB should 'seek a minimum of 2200 homes' thus removing the limit of 'around 2215 homes' as stated in the Local Plan. One hopes that the Council will not submit to this pressure from the MOD, but this raises the possibility of more extensive housing development at SGB than stated in the Local Plan and demonstrates the risk that is associated with acceptance of the HIF grant.

Finally, analysis of the numerous published Representations reveals what I believe is new information relevant to acceptance of the HIF grant. Multiple planning consultants and developers independently consider it unlikely that the proposed SGB housing numbers would be delivered within the Plan period, even Melton Borough Council considering the SGB proposals to be a risk to housing delivery. In addition, the Representations reveal previously unpublished reports by professional planning consultants contracted by Rutland residents independently of Rutland County Council, which very much question the validity of the Council's viability and sustainability appraisals. These long term SGB delivery risks also highlight the danger of acceptance of the HIF grant.

We believe that all of this information justifies rejection of the HIF grant, which would otherwise support an unwanted development that is the most important Rutland planning issue that we will face in our lifetimes.

### **3. Question by Mr D Hodson**

I am speaking on behalf of Greetham Parish Council.

Greetham Parish Council urges you to vote in favour of accepting the HIF bid.

We recognise the opposition to the bid by those closest to the St Georges development but believe there are both fundamental and practical reasons /why this should go ahead.

Sustainability is the key to the future. This is recognised in RCC's policies.

The alternative to Local Plan is the continued development of small villages where the residents inevitably have to get in the car for virtually all their services (schooling, work, shopping, medical facilities).

Our belief is that all new housing should be concentrated in large units where these facilities can be provided.

The HIF bid provides the opportunity or essential infrastructure to be provide at an early stage for such a development.

It is our understanding that St Georges Barracks is classified as a brownfield site and will be developed one way or the other. The Local Plan provides Rutland with the best outcome available.

So I come to the question which I have been asked to present.

**What will be the consequences if the HIF bid is rejected?**

#### **4. Question from Juliet Stuttard**

"The housing infrastructure fund is supposed to forward-fund a truly sustainable new garden village and you have assured us from the outset that there will be one job per household - given this site might be the main location for attracting employers to Rutland in the next 20 years. My son will be returning from University in the 5 years, can you assure me that on my sons return from University he will be able to secure a job very real prospects that will be able to sustain his family and support a progressive career? Specifically, this would mean attracting and retaining employers to the region in good numbers - please outline your plans for doing this, giving an indication of how these have changed given the envisaged change to the employment landscape post Covid"

#### **5. Question from John Donaldson**

"From a review of the Viability report produced by BBP Regeneration in November 2019 the SGB development only creates a £3.5 million return above the existing benchmark land value. This small surplus is only due to nearly £30 million of HIF funding. When set in the context of the scale of the development, the risks in a post Covid world and the disruption to the lives of many Rutlanders over 10-20 years ,the

return looks pitiful. How therefore can it be justified to proceed with such a risky development and spend £30 million of tax payers money when the downside risks are so stark at the outset?"

#### **6. Question from Trevor Gibson**

"I am interested in the Community Infrastructure Levy which would arise should the St. Georges Barracks Development go ahead and how this Levy might benefit the Parishes of North Luffenham and Edith Weston in particular. This is relevant as it forms part of the financial calculations for the development alongside the Housing Infrastructure Fund. North Luffenham is currently developing its first Neighbourhood Plan and our neighbouring Parish of Edith Weston has a Plan already adopted. It is our understanding that 25% of the CIL should be available to local parishes where a Neighbourhood Plan exists yet we can find no reference to this allocation in the budget for the proposed development, nor have the Parish Councils been consulted on the CIL allocation. Could you please explain the Council's approach on this and explain the current situation with regard to the neighbourhood allocations?"

#### **7. Question from Pete Burrows**

"Assuming the Allocation Agreement reduces the financial risk to RCC, what other risks relating to the SGB project been recorded (as we assume a project of this size has to have a formal risk register), And have all of the Councillors been fully informed of these, and additionally that they have all other required information and background knowledge to confidently make an assessment on the £100 million decision being placed before them."