

RCC Planning Committee Meeting 13/7/2021 – representation in person

Speculative Planning Application 2020/0172/OUT

Ladies and Gentlemen,

The Planning Report reaches the right decision based on **some** of the material planning considerations, **but** it does **not** address the '**Heritage Asset**' classification of this landscape, which is also a **material planning consideration**.

The Local Authority has identified and listed this landscape in the Historic Environment Record (HER MLE 24620), and as such it is classified as a 'non-designated **heritage asset of local significance**'. This classification falls within the prescribed definition as a '**Heritage Asset**' **under the NPPF**. The NPPF is clear about the principle of protection and since there are ample alternatives both locally and within Rutland, including more than ample brownfield capacity, its destruction is entirely **unjustified**.

To re-cap, this is **the one and only** Medieval ridge and furrow landscape in Rutland which is classified as a Heritage Asset in its own right, it is a unique, high quality example which has survived undisturbed below sheep pasture since the Medieval period. It provides a still visible narrative of the Medieval 'open field' system way of life linked together with the nearby moated manor, just 900 metres away, and other Medieval heritage such as Oakham Castle. It is a surviving, still visible and rare cornerstone of the history of Rutland.

It is a policy of Historic England **not** to comment on such '**heritage assets of local significance**'. This does **not** mean that Historic England is 'not overly concerned' as claimed incorrectly in the Planning Report. Rather, it is the **responsibility of the Local Authority** properly to assess such Heritage Assets in accordance with policies and further to establish a Rutland Local Heritage List, as recommended by Historic England **and** as recommended specifically in writing to RCC in April 2020. Furthermore, Historic England makes strong reference to the rarity of this kind of Heritage Landscape and its worthiness for protection in their publication 'Turning the Plough' which has been highlighted in the representations to this speculative planning application.

The Local Authority **Archaeologist** states that this well defined and well preserved historic ridge and furrow earthworks landscape would be lost, recommending that the loss of these significant and increasingly scarce remains is given due consideration, taking into account the harm their destruction would cause to the historic environment, in accordance with the NPPF. 'The term 'due consideration' must focus on the fact that **there is no need to destroy this Heritage Asset since there are ample alternatives. In other words it is not justifiable. To do so is contrary to the spirit and the letter of the NPPF and contrary to various local**

policies. It would set an unacceptable precedent that it is alright to destroy a Heritage Asset when there is no need to do so.

It is observed that the Rutland **Conservation Officer** has neither understood the local significance of this classified Heritage Asset nor the policy requirements. He should greatly strengthen efforts to report, support and protect heritage assets in Rutland.

The Planning Report makes reference to the new draft Local Plan, however this has numerous times been found unsound for the subject landscape according to the NPPF, in addition to which there are critical errors and omissions in 3 key areas of the Evidence Base: the Site Selection Study (where there are at least a dozen alternatives), the Landscape Sensitivity and Capacity Study (where this landscape is actually high sensitivity and low capacity) and the Sustainability Report, **none of which state that this land is classified as a Heritage Asset**. All of these errors and omissions have been comprehensively documented in the representations. Accordingly the Local Plan cannot be relied upon as a sound or credible reference for this landscape. We await judgement of this by the Inspector for the Secretary of State who must withdraw this land from the Local Plan; it should never have been there to start with.

To conclude, in line with the Rutland and Whissendine community including the Parish Council and The Rutland History Society, and based upon all the facts comprehensively documented, the **refusal** of this **speculative** planning application is the **right** decision. However, the Planning Report should be amended to address the missing facts about the Heritage Asset classification of this land and the misleading statement about Historic England's views, making it clear that under established policies **this Heritage Asset shall not be destroyed whilst alternatives exist**.

Copies of this representation are available at this meeting and it has additionally been sent by email to the RCC Planning Department.

I will be pleased to address any questions.

Thank you.

Richard Drabble
Whissendine
Rutland

