

Uppingham First Community Partnership

Response to Consultation Draft of the Rutland Local Plan 2016-2036 (July 2017)

Preamble

This response is submitted in the light of the partnership's experience as the lead facilitator and principal author of the now 'made' Uppingham Neighbourhood Plan and the extensive consultation undertaken over the past 24 months on the complementary but non statutory Uppingham Town Centre & Business Zones Plan. Both plans have been praised by national and sub - regional development agencies for their construct and content and can be viewed at www.uppinghamneighbourhoodplan.info This response is also mindful of the government's and the High Court's expressed and documented views on the Localism Act and its intended impact on the preparation of Local Plans and the NPPF. Recently updated DCLG Planning Guidelines make clear the requirement for planning authorities to collaborate effectively and purposefully with local communities and not just local councils. The direction of travel with regard to the government's aspiration for the Localism legislation is clearly one that supports respect for local opinion as expressed in NP referenda and the resultant wider policy framework of local development plans which have been enhanced in this community led way. It is concerning therefore that the draft Rutland Plan, as published, appears to have entirely disregarded this fact leading , unless modified in later form, to an almost certain public and perhaps legal challenge. Specifically page 3 of the document is incorrect. Not all Neighbourhood Plans in Rutland were prepared by Parish and Town Councils but they were all adopted and submitted by them. Similarly the same graphic on page 3 suggests a requirement of complete conformity! It was the precise intent of the Localism Act and its principal authors, subsequently verified by the courts, that development plans may contain N Plans that are only in 'general' compliance with the 'strategic' policies of the local plan. This draft plan seeks to take away that right by demanding 100% compliance and detailing virtually all of its draft policies as strategic, rather than identifying a modest number of overarching 'core' policies leaving room for local communities to develop key local strategic policies of their own that complement and add local character to the development plan. While accepting that N Plans will need updating to reflect the updated local plan when agreed, it is not acceptable that the starting point of this draft plan is the old draft plan. The law requires that it is the local plan as modified by the county's 'made' N Plans that is the starting point for change. Local communities do not have to have to justify or provide further evidence of their existing N Plan policies already adopted by planning authorities. Simply trying to reverse or ignore NP policies without substantial legal or developmental cause will lead to the collapse of the localism initiative and a loss of confidence in what has been seen to be a very popular government and county policy. The partnership would urge RCC to listen to the many protests emerging from local parishes and communities about this fundamental flaw in this consultation version of the draft local plan. Given the many positive efforts toward sustainability evident in the draft plan it would be regrettable if it was severely criticised by a planning inspector, DCLG or the courts if it were not amended to address the not insignificant community and parish concerns.

Our Evidence Base

While subscribing to Uppingham Town Council's new N Plan Committee (An UF director is vice chair and another is lead on its Draft Local Plan response), it should be noted that this UF response is founded on independent evidence gathered from extensive consultation with the Uppingham community and in particular its business and civil society sectors. UF supports the submission of UTC and its comments on individual draft policies except where varied or enhanced by the following paragraphs. This UF response is founded on comment and opinion derived from debate at the Uppingham Business and Neighbourhood Forums together with opinion expressed by the new Uppingham Vanguard Board +, schools, landowners, developers, community and business surveys, questionnaires and focus groups, together with comment from DCLG, Locality and CPRE. It is also informed by the outputs of a meeting of 21 parishes hosted by the partnership early in September under the auspices of the Leicestershire and Rutland Association of Local Councils of which an UF director is Vice Chair.

The Concerns

Spatial Strategy and Location of Development – The government's views on Localism suggest that Uppingham can be simply required to achieve the declared housing target and the UTC N Plan Committee charged with the task of indicating where that development should be. Indeed both UTC and UF wish to see the number of homes built exceed the minimum allocated to Uppingham as evidenced in the UTC response and the UTC&BZ Plan. The draft

Local Plan is unnecessarily restrictive and limits sustainable economic and social growth. Ironic is the concern of many villages which wish to limit growth to protect their heritage and character. Uppingham wants more; villages want less. A 70% -30% split seems to make everyone unhappy. There is an intelligent win/win conversation to be had here!

Creating Sustainable Communities – Much of the evidence for the Draft Local Plan seems to be derived from devolved sub regional strategies e.g. SHMA, or outdated studies e.g. parking, with little regard for local need and determination. An accurate local determination on present and future housing needs is required. UF would be pleased to collaborate with UTC and RCC to undertake an accurate full housing survey in the town.

The evidence gathered for the UTC&BZ Plan makes it clear that employment needs and skill shortages should figure in any sustainable community strategy. The draft Rutland Local Plan does not appear to reflect this critical requirement.

Employment and Economic Development – The fine principles for economic growth stated on Page 65 of the document do not appear to be reflected in the proposals for Uppingham. The draft plan sets Oakham above Uppingham. This is not acceptable nor sensible from the perspective of the Uppingham community and is quite rightly challenged by UTC. Rutland has two market towns both of which need sustainable employment and housing development to thrive. The Uppingham community is supportive of mixed use on the Uppingham Gate development and of limited expansion of appropriate retail at the Welland Vale Nursery site as evidenced in the UTC&BZ Plan. There is specific agreement among businesses that further development should be supported at the Station Road, Welland Vale and Uppingham Gate employment sites, and for economic support for this proposal to be sought from the GCGP LEP. This holistic and economically sound strategy is not reflected in the draft Local Plan. The suggestion that the prime shopping frontage in Uppingham High Street should be reduced is an outrage and is not supported by the still valid Uppingham Neighbourhood Plan nor the UTC&BZ Plan, both of which call for town centre growth and the preservation of the town centre's unique offer. Similarly the unequal treatment afforded to the Eyebrook reservoir, critical to Uppingham's tourism offer, suggests a discriminatory approach not in keeping with equality of opportunity essential to sustain both Rutland's market towns.

Corby Growth – While briefly mentioned, the substantial growth planned for Corby and its likely impact on Uppingham and the A6003 is not addressed in the draft Rutland Plan. All available evidence suggests that the line of a possible future north south bypass for both Caldecott and Uppingham should be included in the final draft of the plan and reflected any new sites approved for housing development.

Transport and Accessibility – It is noted that RCC is to publish a related transport strategy in the autumn. UF reserves any comment it may have on this section of the draft plan until the transport document is available. UF welcomes the draft plan's support for electric vehicle charging.

Telecommunications and High Speed Broadband – UF supports the draft plans aims for high quality mobile and broadband services. The partnership submits that this will only be achieved by the means of 'fibre to the premise' and impartial and competitive relationships with suppliers. The blatant attempt to promote the Council's contractual relationship with BT and Openreach on page 89 of the document is unparalleled in a planning policy document and believed to be anti-competitive under European law. It is likely to be challenged if not removed.

Summary

As stated earlier this consultation response is intend to complement that of Uppingham Town Council, hence repetition of comment on many specific polices has been avoided. The partnership's primary concerns about the draft document revolve around unfairness and inconsistency of economic growth polices as they apply to both market towns and particularly Uppingham; the apparently deliberate attempt to stifle present and future N Plans via an inappropriately lengthy and restrictive set of so called strategic policies; and the complete failure to adopt a proactive and constructive approach to stimulating economic growth and infrastructure development in and around Uppingham. Like the Town Council, business and civil society look forward to a very different second draft.

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