

Firstly, thank you for providing us with the opportunity to comment on Stamford Neighbourhood Plan, this document appears to have undertaken a comprehensive approach and is largely well put together. Upon reading the Plan, we provide a few comments below in respect of the potential effect of this plan on the jointly proposed Stamford North allocation and therefore, on land outside the Neighbourhood Plan area but within Rutland.

Paragraph 8.6 refers to the capacity of Quarry Farm as “around 600 additional homes” which is inconsistent with Policy H4 of the Rutland County Council emerging Local Plan. This statement should be amended to read “no more than 650 homes” to ensure consistency throughout policy documents for the Quarry Farm site.

Regarding Policy 1, Integration of New Residential Allocations (Stamford North), whilst very helpfully written and detailed, it is important to note that these development principles will not apply to the Quarry Farm site as it is outside the Neighbourhood Plan area. Also, as a result of no representation being made by Stamford Town Council or Stamford First, regarding the provisions of submitted RCC Local Plan policy for Quarry Farm (Policy H4), this thereby cannot be addressed at the forthcoming Local Plan Examination. Rutland County Council will therefore be required to take a view on whether to propose changes to its Policy H4 of its submitted Local Plan, to reflect elements within Stamford Neighbourhood Plan Policy 1.

Furthermore, Policy 7: Diversifying Stamford Town Centre, makes reference to A use classes which as of September 2020, were revoked and replaced by the newly introduced Class E, alongside A4/5 usages becoming defined as Sui Generis. These changes to the new E class and Permitted Development rights may make this policy ineffectual thereby modifications are required.

Finally, Rutland County Council object to the ‘Locally Important Landscape Views’ section of Stamford Neighbourhood Plan (paragraph 12.11 onwards), and the inclusion of views 1 and 2 within Policy 10 for the following reasons:

Paragraph 12.13 states that “Any new development within these areas will have to be carefully designed to avoid damaging these views, and it may be prudent to keep development away from these views altogether unless it can be adequately demonstrated that harm can be minimised.” View 1 is located upon Casterton Road, projecting directly across the Quarry Farm site into the administrative area of Rutland County Council; whilst View 2 is from Ryhall Road directly across the proposed development of Stamford North allocated in the adopted South Kesteven Local Plan; and View 3 looks northward from Uffington Road into the administrative area of Rutland County Council.

Views 1 and 2 are challenged as it is difficult to see how the Neighbourhood Plan can seek to protect these views, yet support the development of Stamford North simultaneously. There is essentially conflict within these two policies of the Neighbourhood Plan.

Policy 10 is therefore considered not to be in general conformity with the strategic policies of the South Kesteven Local Plan due to its potential impact on the Stamford North allocation. Additionally, it will also impact on the proposed site allocation for Stamford North set out in the submitted Rutland Local Plan.

Additionally, as View 1 relates entirely to land outside the Neighbourhood Plan area and View 3 partly to land outside the Neighbourhood Plan area, if this policy would remain as worded, it would

be ineffective with respect to both Views 1 and 3 as it is difficult to see how the policy can apply to developments outside the NP area where decisions on planning applications will be made by a neighbouring local planning authority.

Similar consideration may also need to be given to View 9 where this looks directly south into Peterborough.

The level of robust evidence to support and justify the selection and protection of these views is insufficient. The inclusion of a few photographs and a brief description as to why the views are deemed important in the table below para 12.14, fails to justify the inclusion.

Referring to protection of View 1, the table concludes; “The open character on this approach affords protection to preserve the agricultural heritage and the long established essential rural feel that these farmlands and natural features offer” this raises the question of, how can this be retained if the site has already been allocated for development? Similarly, the table concludes that for view 2 “Encroachment into this space should be resisted in order to prevent erosion of undulating character leading to the town” once again, this is unachievable with the proposed development of the site for the Stamford North urban extension. It is to be noted that the recognition of the importance of the well-defined tree and hedgerow screen along the edge for view 1 is supported by RCC, and retention of these landscape features is encouraged.

Moving to Policy 10, this designates the discussed 2 views alongside implementing the following criteria: Criterion 3 – “New development proposals should take into account the identified Locally Important Landscape Views and be designed to respect their significance in the wider neighbourhood area”; and Criterion 5 – “Proposed developments that would have an unacceptable impact on the character and appearance of its immediate setting and/or on the integrity of an identified Locally Important Landscape View will not be supported.”

Adhering to these criteria is practically difficult for the sites of Stamford North and Quarry Farm due to the location of these ‘Locally Important Landscape’ viewpoints, therefore including both, support for the development of Stamford North sites, and encouraging protection of these 2 view within Policy 10, is impossible within the Stamford Neighbourhood Plan as these are contradictory.

On this basis it is our view that as written Policy 10 is not in general conformity to the strategic policies of the adopted South Kesteven Local Plan given the impact this policy would have on the delivery of the strategic housing allocation at Stamford North in that development plan.

This policy is not effective or justified. Paragraph 13 of the National Planning Policy Framework is clear that Neighbourhood Plans should support the delivery of strategic policies contained in local plans and spatial development strategies. The potential impact of Policy 10 is therefore contrary to the NPPF.

On this basis, it is our view that the Stamford Neighbourhood Plan does not currently meet the basic conditions set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

