

# St. George's Barracks High Level Masterplan – North Luffenham Parish Council's Response to the Consultation

## EXECUTIVE SUMMARY

In our view Masterplan proposals are incomplete due to the lack of clarity on what infrastructure will be provided and when it would be built. The acceptability of any new town proposal to the local communities is inextricably linked to the timely provision of both improved and new infrastructure. We recommend that these proposals are reworked to include the proposed infrastructure provision and that the draft Masterplan is then subject to a second public consultation prior to being finalised. The Parish Council stands ready to assist the Project Board in the development of a revised Masterplan.

The key points that we would wish to see addressed in the final Masterplan include:

### **a. PROPOSED SIZE OF THE DEVELOPMENT.**

At present there is no evidence that identifies the need for the proposed development of 3,570 new homes; the size of the proposed new town is entirely outside the scope of the Rutland County Council (RCC) Draft Local Plan. In addition the proposed development is greater than that initially briefed of 1,500 – 3,000 new homes depending on how much land would be available following the mineral extraction survey. This figure is considered to be far in excess of the 'need', even taking into account the regional housing requirement. It is the view of the Parish Council that the proposed development must be considered as part of a detailed review of Rutland's needs for the future and cannot be considered to be solely a 'windfall' added to the identified long-term requirement. As previously identified, we would urge the County Council to take a phased approach, building a total of no more than 1,500 to 2,000 new homes over an extended period.

### **b. HOUSING DENSITY**

The initial brief was that RCC would, by working in a Public / Public Partnership be able to influence the scale of the development, ensuring that housing density would be some 20 houses / hectare (though we note that this is twice the density of the adjacent Rutland villages). Due to the commitment to build at least 3,000 homes on a greatly reduced area, now circa 100 hectares, the density of housing has now increased by almost 50%. This high density urban approach is unacceptable to us as a community and certainly does not reflect RCC's earlier commitments to maintain Rutland's character in developing the new town.

### **c. INFRASTRUCTURE**

Very little detail is included in the Master Plan on the proposed scale of the infrastructure enhancements required, however it is clear that notwithstanding the need for new medical, retail, education (Primary and Secondary), sports and leisure amenities (a full 'cradle to grave approach'), a major area of substantive infrastructure development will relate to transport (see main text below). We recommend that planning permission for the new settlement is conditional on the road infrastructure improvements being put in place at an early stage and completed by the time work commences on the 500<sup>th</sup> home.

#### **d. THE GREEN GAP**

While we welcome the choice of a development option that includes a 'green gap' between the new community and North Luffenham we do not believe the gap is adequate and recommend that the existing west to east runway marks the development limit of the new settlement. We are particularly disappointed and alarmed by the proposals to suburbanise the green gap with playing fields. We recommend that the green gap forms part of the country park and is reserved for informal recreational activities.

#### **e. QUARRYING PROPOSALS**

We believe the proposed extent of quarrying is too great; in particular we do not wish to see it extending south of the perimeter taxi way (see diagram in main response). This approach would reduce local impact of the quarry, reduce wider landscape impacts, allow access to the Thor Missile Sites (as a visitor attraction), and ensure both communities continue to have access to the stunning views of the Chater valley.

#### **f. ENVIRONMENT**

The impact of the proposed development to the environment so close to the Rutland Water SSSI and SPA cannot be underestimated and needs careful assessment. The airfield element of the site is some 200+ha in extent. As a closed military training area it has not been subject to a full ecological survey. The results of such a survey are needed before development proposals are finalised. We understand that the open area consists of a mosaic of unimproved neutral and limestone grassland. Given the priority attached to limestone grassland in the Leicestershire and Rutland Biodiversity Action Plan we believe any loss of grassland habitat should be offset. We therefore trust that RCC and MOD will be adopting best practice in relation to the 'net gain' principles established by the Government's 25 Year Environment Plan. We are also concerned by proposals to quarry so close to the Thor Missile complex we do not believe this is compatible with the need to conserve these listed structures in their 'original military context'.

#### **g. JOB CREATION / EMPLOYMENT**

The plan lacks any imagination or credibility in respect of job creation. If some 3,000/3,500 new high quality jobs are to be created on site, an exciting and workable partnership would be needed to be formed with a major new employer such as a University or technology company. Given the Government's commitment to the nearby (but out of range) Oxford-Milton Keynes-Cambridge 'Development Arc' and the lack of nearby academic institutions this appears to be a very unrealistic ambition. The suggested local demand for jobs, for which there needs to be clear evidence, does not reflect in any way the commitment made to find at least one new job for every home built. In addition nothing in the plan indicates any proposal to attract businesses to the site or build on Rutland's important and vibrant leisure and tourism industries.

# NORTH LUFFENHAM'S 'TOP 5' ISSUES

## 1. Scale and density of the proposed new town development

While we understand MOD's desire to maximise financial returns and contribute to national housing targets we feel that this needs to be done in a way that is '*Right for Rutland*'. We feel the proposed development of 3,570 homes is too large given both Rutland's rural character and the lack of adequate communication links to the surrounding areas. As a community we could have lived with a new large village of 500 to 800 homes and feel this would be in keeping with Rutland's character. We do acknowledge that the Government's 'Garden Village' funding is only available for new settlements in excess of 1,500 homes, so with great reluctance we recognise that the St. George's partnership proposals for the new settlement will not be less than 1500 to 2000 houses. We wish to make it clear that we cannot support a development of the size proposed in the Masterplan and would ask that consideration is given to reducing its size.

It also follows from the above that we do not support proposals for a future satellite settlement at the eastern end of the site and would recommend that this proposal is dropped from the finalised version of the Masterplan.

We believe the proposal for an average density of 29 dwellings per hectare (dph) is inappropriate. This is more than 3 times the average density of homes in North Luffenham and Edith Weston and so out of keeping with the character of the area. The density examples given in the Masterplan are in our view not linked to this type of rural location and so inappropriate; all the more so in a county that prides itself on its rural identity. A lower average density of 15 to 20 dph would still deliver a significant sized new community, be more in keeping with Rutland's rural character and provide a high quality of life for residents.

We also feel that the Masterplan as currently drafted lacks imagination in how the available space is to be used, the focus on high density housing (for Rutland) could lead to the creation of characterless dormitory town detached from its rural setting and the remainder of the county. Members of our own community have suggested opportunities that make these links and it is disappointing to find the Masterplan not embracing such possibilities. Examples include:

- A National Cold War Visitor Centre (based on the Thor Missile Sites and the Bloodhound Radar Tower).
- Hotel accommodation that capitalises on the opportunities presented by Rutland Water (Sailing, fishing, walking, cycling, birdwatching etc.)
- Development possibilities linked to Rutland's leisure and tourist industry (the county's most important economic asset)
- A state of the art luxury retirement complex with restaurant, gym, swimming pool, elements of which could be shared with the local community.

## 2. Infrastructure

We believe that the lack of any substantive infrastructure plans in the current draft Masterplan leaves it fundamentally flawed. This is a key issue for the surrounding communities; we remain flabbergasted that the current draft Masterplan has provided such a limited amount of information on how the new town will be integrated in to the surrounding area. Issues that need to be urgently addressed (and consulted on) include:

- preferred road routes (especially the link to the A1),
- local road and junction improvements (including with the A1 and A47),
- provision of a new principle access road/route (to link to the A606 east of Empingham), to avoid bringing traffic in Edith Weston to a standstill),

- integration of road access points to the new town into the surrounding road network,
- given the anticipated increase in rail traffic how will the much more regular closure of the railway level crossing between South and North Luffenham be managed to avoid long delays for the existing community?
- the feasibility of providing a rail access through the creation of a new Luffenham station (given that the site of the old station has been developed),
- clarity on bus provision
- and also how and when all of these improvements would be phased in and which of them are dependent on the settlement being of a certain size. We believe that the infrastructure improvements should commence at an early stage and be completed by the time a start is made on the 500<sup>th</sup> new home

In addition to the specific issues already mentioned we believe road infrastructure will be needed at (at least) the following locations:

- Manton Top
- Manton to Edith Weston (in particular to provide a dedicated cycle way to avoid cyclists twice having to cross this road),
- Edith Weston – Normanton Road
- Edith Weston – North Luffenham Road
- Blind Bend adjacent Edith Weston Rd / Ketton Rd Junction in North Luffenham
- South Luffenham Rail Crossing
- Stamford Road roundabout just east of South Luffenham
- Junction Empingham Road / Normanton Road

### 3. The 'Green Gap' between Settlements

We are pleased that the Masterplan has addressed our previously expressed concerns and selected the development option that provides for green space between the new community and North Luffenham. However we feel the size and land use of the Green Belt (the 'Green Gap') between the Edith Weston / St. George's new town development and North Luffenham **is inadequate and wrong**. In particular we object to:

- The limited width of the Green Belt space, we believe the new town should not extend south of the main east/west runway (see Figure 1).
- We are shocked by the proposed suburbanisation of the Green Gap zone by the inclusion of playing fields. This is simply not an appropriate land use for an area of 'Green Belt' that should be there to provide clear separation between communities. In addition to this over-riding concern we feel that playing fields in this area would inevitably lead to development creep, with clubhouses, flood lighting or even further housing if the sports provision was no longer required. We recommend that a sensible approach would be to extend the country park to include this Green Gap space. This would provide open countryside between North Luffenham and the new settlement and as a country park this area of countryside would be accessible for informal enjoyment of the countryside by the residents of both the new town and North Luffenham.

Given our complete opposition to including sports provision in the Green Belt zone and our recommendation that the settlement is limited to 1,500 homes we suggest that sports provision is provided either on the area of former military playing fields just north of the east/west runway or on the eastern edge of the settlement. This would ensure that the whole area of the green

gap would have the feel of restored 'countryside' while maintaining a link to its airfield heritage (note also our recognition of the opportunities provided by the Cold War heritage features in this area – see comments below).



*Figure 1 – Proposal for Green Belt / Green Gap between the two communities*

- We are shocked by the proposed suburbanisation of the Green Gap zone by the inclusion of playing fields. This is simply not an appropriate land use for an area of 'Green Belt' that should be there to provide clear separation between communities. In addition to this over-riding concern we feel that playing fields in this area would inevitably lead to development creep, with clubhouses, flood lighting or even further housing if the sports provision was no longer required. We recommend that a sensible approach would be to extend the country park to include this Green Gap space. This would provide open countryside between North Luffenham and the new settlement and, as a country park, this area of countryside would be accessible for informal enjoyment by the residents of both the new town and North Luffenham. Given our complete opposition to including sports provision in the Green Belt zone and our recommendation that the settlement is significantly small than the 3,500 homes proposed we suggest that sports provision is provided either on the area of former military playing fields just north of the east/west runway or on the eastern edge of the settlement. This would ensure that the whole area of the green gap would have the feel of restored 'countryside' while maintaining a link to its airfield heritage (note also our recognition of the opportunities provided by the Cold War heritage features in this area – see comments above and below).

- We are concerned about the creation of the proposed road access point to the new community midway between Edith Weston and North Luffenham. While we appreciate the geographical constraints on access options to the site we would request that the road layout in the new settlement is designed in such a way as to limit its ease of use to only those residents who live in the southern part of the new settlement.

#### **4. The extent and landscape impact of the proposed quarry**

We believe the extent of quarrying activity should be determined once ecological and heritage surveys have been completed. In particular we note the requirements in Paragraph 17 of the National Planning Policy Framework that plan-making and decision-taking should be bound by the following principles:

- ‘contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value .....
- *‘encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value’*

In our view almost the entire old airfield is of high environmental value so should be safeguarded from development.

If quarrying is allowed we do not believe the quarry should be extended to the southern boundary of the old airfield. This brings it too close to North Luffenham (so creating an unacceptable disturbance issue) and because the ground starts to slope in to the Chater valley would cause an unacceptable impact on the wider Rutland landscape. Limiting the extent of the quarry to the area north of the existing perimeter taxi way (and preferable slightly further north) has additional important benefits:

- It would provide green space and enable the creation of a country park from the outset, so providing pedestrian and cycle access for both communities to the ecology and heritage zone around the Thor Missile Sites,
- It would ensure that the exceptional views of the surrounding countryside that residents have been able to enjoy since the army relaxed access restrictions to the old airfield are maintained. These would be lost if this part of the site was quarried,
- It conserves more of the existing important grassland habitats and their rich and diverse wildlife; an important and exceptional part of our local heritage,
- It reduces the St. George’s partnership’s habitat compensation and biodiversity net gain requirements,
- It provides a buffer zone that reduces the landscape impact of the quarry on the surrounding area.
- It provides a heritage corridor between the airfield’s key Cold War historic assets; namely the Thor Missile Sites in the east and the Bloodhound Missile Radar Tower and other structures in the west. The original military context of that corridor (as an airfield) would be lost if this part of the site was quarried. We believe the Bloodhound Radar Tower should be refurbished to provide a visitor centre and viewpoint for the country park. This centre could also provide interpretation of the site’s Cold War heritage and act as a gateway to the Thor Missile complex, so providing an important cultural asset for Rutland. A more imaginative approach still would be to create a National Cold War Museum that could be a major cultural and educational facility for Rutland (and would also provide employment opportunities).

In order to achieve these objectives we suggest that quarrying is excluded from the areas shown in Figure 2.



*Figure 2 – Area to be excluded from quarrying activity (see text for explanation) – this figure should be read in conjunction with the plan on pages 4 & 5 of the Masterplan consultation.*

We presume that the mineral site investigation report published by RCC in January has now been subject to further interpretation and analysis to determine the extent of the economic mineral resource and the areas that needed to be safeguarded from built development. It would be helpful if the St. George's partnership could publish this information to enable better understanding of one of the key constraints on development proposals. It would also help to understand how you have determined what would constitute a viable economic resource at this site.

**5. Failure to fully address the environmental impacts of the new town and quarry development proposals**

Our concerns include:

- Despite the use of the word 'Landscape' at the start of section 7 of the Masterplan there is no reference to how landscape impacts of the new town development will be addressed other than the inclusion of what is presumably a final design plan. Given this could be at least 40 or 50 years away a whole life approach to landscape impacts is needed.
- A misconception that the airfield is an 'empty expanse' rather than an area teeming in wildlife that provides an area of glorious open space with fantastic views.
- We believe that there is in our view no need to impose the pre-1939 field system during the post quarrying phase. This field system was after all simply a short-lived imposition dating from the Enclosure Acts prior to which this was

an open field system that included Wytchley Common. In the memory of all but our very oldest residents this is an open landscape area (and valued locally as such), a space that provides stunning views of the Chater valley and surrounding countryside. We recommend maintaining the open nature of the site; including in the quarry / country park restoration plans and that this should be a required condition of any planning and regulatory permissions.

- The Masterplan fails to explain how impacts on important wildlife habitats and scarce species will be compensated for and whether the Rutland County Council and MOD partnership will embrace the biodiversity 'net gain' approach that is now Government Policy following the publication of the Government's 25 year environment plan in January.
- Full ecological and heritage surveys are needed to ascertain the importance of the site's wildlife and cultural heritage. Once these have been undertaken we recognise that there may be a need to amend the Masterplan proposals to reflect the site's wildlife and heritage value. We understand that the County Ecologist, Sue Timms, has already written to RCC setting out ecological survey requirements and we would offer our full support to her recommendations. We request assurances that the development partnership will also be adopting a best practice approach to assessing the archaeological and heritage features that are present on site. Given the risk to these sensitive features and habitats can RCC and MOD please provide confirmation that no site clearance operations or significant land management operations will be undertaken until these ecological and heritage assessments are complete?
- We do not find the proposals to quarry and then develop a satellite settlement in close proximity to the Thor Missile Site complex (less than 40 metres based on the Masterplan diagrams) acceptable. In our view this is not compatible with the objective of conserving these historic structures in their 'original military context'. We believe that quarrying should not extend south / south-eastwards of the line of the old road that ran from Wytchley Warren Farm to North Luffenham (and the extraction line may need to be amended once full ecological and heritage surveys have been completed). Figure 2, above, identifies the area that should be excluded from quarrying.
- Avoidance of eutrophication (nutrient enrichment) and pollution of the River Chater and its tributaries through sewage disposal and effluent from the new settlement. We presume that the new settlement will not be allowed to discharge its treated waste water in to Rutland Water. We recognise that the easiest alternatives are the water courses in North Luffenham. Given these are rich in wildlife and include several Local Wildlife Sites we seek assurances that sewage and waste water treatment is designed to the highest possible standards so as to avoid nutrient enrichment and will include extensive reedbed filtration prior to final discharge.
- While we welcome the proposal to ensure car parking provision meets RCC's existing standards we are aware that car ownership predictions for new housing developments are challenging to get right and that mistakes have been made nationally. Given this site's rural location, poor public transport and remoteness from employment opportunities we believe car ownership could be significantly higher than anticipated. In order to ensure a high quality environment for the new community it is important to get this right. A phased approach to development would allow adjustments of the design criteria.



## Other Issues

- Contrary to the statements in the masterplan (section 5) Rutland's sandstones and ironstones have **not** been used for building 'throughout' the county. There is a clear tradition, reflected in each village's vernacular style, of using the stone that can be quarried on the site of each settlement. This is reflected in the complete domination of limestone in the buildings in the old parts of North Luffenham, Edith Weston and Ketton; the villages that surround the proposed new town development. Given that the site is also to be quarried for its limestone we would seek assurances that where stone is used (and we would welcome its use) this is restricted to limestone.
- Given the absence of allotments in Edith Weston and Ketton, the heavy demand for North Luffenham's allotments and the high density of homes proposed for the new town (with many homes inevitably having small or no gardens) we recommend that adequate space is allocated within the new settlement for allotment gardens.
- Thanks to Rutland Water and several other notable nature reserves environmentally based tourism is an important part of Rutland's economy. In recognition of this we recommend that the new settlement should make an important contribution to biodiversity and sustainability in the way it is designed, built and operates. Examples include rain and grey water harvesting and reuse, exemplary high energy efficiency design, building in space for wildlife in to all homes (we recommend one built-in bird box for each bedroom in each house in all homes and a similar scaled approach for commercial and public buildings), built in bat boxes (one home in ten) and final treatment of waste water through reedbeds.
- We are concerned about the loss of North Luffenham golf course; we believe this provides an important and affordable resource for the local community. Given the care that that has been taken on its landscaping it is clearly no longer part of the airfield and we presume falls outside of the 'brownfield' definition applied to other parts of the site.

## Masterplan Credibility

- We are disappointed at the failure to allocate provision for secondary education in the new town. We believe this is short sighted and will detract from its appeal as a place to live and work.
- While the aspiration to create one job per household is welcomed we believe this is at best wildly optimistic. We would welcome sight of the evidence that gives credibility to the assertion that it will be possible to provide in excess of 3,500 jobs on site. This is an important issue as it relates closely to infrastructure requirements and public transport provision.
- We believe that without credible justification of the job creation possibilities there is a risk of serious miscalculation of the number of daily vehicle movements that will result from the development of the new town. In our view the vast majority of residents will have to travel long distances to reach work so creating a rush hour nightmare on local roads (this obviously links back to our already expressed concerns about infrastructure provision).
- We welcome the proposals to include a range of housing types within the new community however we are concerned that political pressure to provide a disproportionately large amount of affordable housing might lead to a social imbalance within the new community. This is clearly a sensitive but important topic and we believe one that needs to be given careful consideration at an early stage of the development proposals.
- Development of this site also needs to give consideration to its ongoing carbon footprint. If this settlement requires most of its residents to travel long distances to work then this will lead to a marked increase in Rutland's carbon emissions and so indicates that an alternative location nearer to existing urban centres would be the best place for housing expansion.

## Appendix 1

### Answers to the Masterplan Consultation Questionnaire

**Q1. What do you think about the overall vision for the St George's Barracks site?**

As you will have gathered from our response we are deeply unhappy about the proposals in their current form.

**Q2. What investment in public services or infrastructure would you like to see as part of any future development?**

Comments on infrastructure requirements have been made in our response. The provision of public services will be dependent on the decision on the final size of the settlement.

**Q3. How important to you is the provision of housing that is affordable to young families?**

It is important to provide such provision for the residents of Rutland. We do not accept that there is a need to meet this requirement in Rutland for the residents of other local authorities.

**Q4. In your view, what facilities are most important for a local centre that would sit at the heart of any future development?**

No comment.

**Q5. How would you like to see the minerals extraction area utilised until that point that access to the minerals is required?**

It is our preferred view that the Green Belt between North Luffenham and the new town should be a country park from the outset of the proposed development. Therefore we suggest that any areas awaiting quarrying are managed as part of the country park. Those areas of highest environmental quality should be managed so as to maximise their biodiversity potential, effectively a nature reserve within the country park. The introduction of grazing by cattle or sheep would be compatible with such an approach.

It follows that quiet recreational activities such as walking, cycling and picnicking would be compatible with such an approach. We do not believe that formal organised team sports would be appropriate.

**Q6. A country park is proposed as part of any future development. How would you like to see this used?**

As mentioned above we believe that quiet recreational activities such as walking, cycling, picnicking and informal play space would be compatible with such an approach. We do not believe that formal organised team sports or other sports provision (such as playing fields) would be appropriate.

The introduction of grazing by cattle or sheep would be compatible with such an approach.

If a lake is created we believe, given the area's existing conservation value, this should be treated as a nature reserve space and recreational activities on or adjacent to the lake should be those that are compatible with the wildlife interest.

**Q7. With a new development would come an opportunity to provide new *and/or* improved bus services in the local area. Where do you think improved bus services should link to?**

No comment.

**Q8. Are there any other uses or provisions you like to see on the St George's site as part of any future development?**

Covered by our response above

**Q9. Please use the space below to provide any other comments or feedback regarding draft plans for the St George's site**

Covered by our response above