



North Luffenham Parish Council

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NLPC/SGB/Local Plan Consultation

Sep 18

See Distribution

NORTH LUFFENHAM PARISH COUNCIL (NLPC) RESPONSE TO RUTLAND LOCAL PLAN CONSULTATION CONSIDERING THE IMPLICATIONS OF POTENTIAL DEVELOPMENT OF ST GEORGE'S WITHIN THE LOCAL PLAN AND CONSULTATION DRAFT PLAN - ADDITIONAL SITES

References:

A. RCC Rutland Local Plan 2016–36 Development Plan Document dated Jul 18.

GENERAL

1. North Luffenham Parish Council object to the incorporation of St Georges Barracks (SGB) into a new revised Local Plan. The St George's Barracks (SGB) development proposal should NOT PROCEED to the next stage Local Plan (early 2019) due to unresolved objections both as to principle and procedure.
2. The housing requirements of Rutland up to 2036 have been unjustifiably inflated, but even those inflated needs can be met without any additional housing at SGB, either by adhering to the draft 2017 plan or adding back some of the withdrawn windfall sites.
3. In the view of North Luffenham Parish Council (NLPC) the consultation timescale was too short for such a significant proposed change to the Local Plan. The document was complex and required a detailed understanding of a number of Government publications including:
 - Fixing Our Broken Housing Market – Feb 17. (The Housing White Paper)
 - National Planning Policy Framework – Jul 18.
 - Planning for the Right Homes in the Right Places – Sep 17.
 - The Draft Rutland Local Plan 2017

Inevitably this consultation response has only scratched the surface of this complex issue.

4. In the absence of detailed briefing material the Parish Council spent much time in research and briefing. In preparing this response we have worked with local Parish Councils and Action Groups in particular: Manton Action Group, Empingham Parish Council and Edith Weston Parish Council and Action Group and have identified much common ground.

5. In seeking to justify their proposals for creating a new so-called "Garden Village" at the St George's site, RCC relies heavily on the government's publications "Putting the Right Homes in the Right Places" and the July 2018 National Planning Policy Framework document. NLPC takes the view that this justification is flawed, failing to take account of all relevant clauses of the policy document, particularly as applied to this unique location.

6. The complexity of the subject required the Parish Council to provide Villagers with a summary of the key issues that it considered had the greatest impact on this Village. These points are made in blue in this document.

7. In principle, the Parish Council is supportive of the proposal that RCC take control of the future development of the site. However, we believe that at this stage it is both PREMATURE and unfit for inclusion in the local plan.

AUTHORITY

8. Our formal response to both consultations (attached) has been endorsed by the Parish Council at its meeting on Thu 20th Sep 18 (Minutes : 59/18 and 60/18 Refer).



PBG CUMMINGS
Chair North Luffenham Parish Council

Attachment:

1. NLPC response to Consultation Document – Considering the implications of potential development of St George's Barracks within the local plan.
2. NLPC response to Consultation Document – Additional Sites

Distribution:

Action: Local Plan Review Team: localplan@rutland.gov.uk

Information:

Cllr Bools

Cllr Waller

Parish Council

Village Web Site

**NORTH LUFFENHAM PARISH COUNCIL
FORMAL RESPONSE TO CONSULTATION DOCUMENT
SPECIFIC CONSULTATION CONSIDERING THE IMPLICATIONS OF
POTENTIAL DEVELOPMENT OF ST GEORGE'S WITHIN THE LOCAL
PLAN**

**SECTION 1
IMPLICATIONS FOR THE SPACIAL PORTRAIT, VISION AND
OBJECTIVES**

**QUESTION ONE: CAN YOU SUGGEST ANY AMENDMENTS TO THE
VISION?**

1.1.1¹ Bullet Point 1 - Delete all reference to a new community at St George's: ***"including a new community at St George's which has embraced the principles of a planned Garden Village"***, on the basis that:

- a. the need for additional housing to meet the OAN has not been adequately proven.
- b. that RCC have identified that the site is at best only "relatively sustainable". (Para 1.16)
- c. that should proposals proceed to develop the site, RCC will be faced with the difficulties of dealing with "the challenges facing this location". (Para 1.18)

1.1.2. Within the 2017 draft Local Plan the quoted future housing requirement for Rutland has been met in full. No convincing analysis has been provided as to why the current 2017 draft Local Plan is no longer the preferred option.

1.1.3. The adopted Local Plan contains several Core Strategies, which the proposals in this consultative document seek to overturn. In particular:

- CS6 – built development to be minimised on undeveloped airfield land. The proposals made in the Masterplan, and hence implied in this Vision, do not conform to this policy in any respect.
- CS9 – 70% of new housing to be located at Oakham and Uppingham and 20% within and adjoining Local Service Centres. Compliance with the Vision as stated requires a different housing distribution.
- CS2/CS4/CS14 – development will be directed towards the most sustainable locations (Oakham and Uppingham). St George's is quoted as both "challenging" and only "relatively sustainable".

1.1.4. The proposed transfer of housing from Oakham, Uppingham and the larger villages of 1,200 homes to St George's Barracks (Table 2) is not based on the existing spatial strategy, need or opportunity. The basis of this hugely significant change to the spatial strategy appears to be that St George's

¹ Paragraph Numbering: = Section.Question.Paragraph.

Barracks is available, has been classified as a brownfield site, and therefore **must** be used for housing growth. This decision does not appear to take into account the isolated position of St George's Barracks and the lack of suitable facilities and infrastructure that make it entirely unsuitable for housing development on the scale proposed. Nor does it acknowledge that the government's "pressure" to make use of brownfield land for housing development includes a range of caveats, including the option to develop the land for "other uses", a requirement to safeguard and improve the environment and ensure safe and healthy living conditions, the need to ensure a new development is appropriate for its location, and that recreational land (e.g. a golf course) should not be built on unless specific criteria have been met.

1.1.5. In sum, it is clear that all of RCC's currently adopted policies would counter a proposal to build a significant new development in open countryside. Therefore the proposal to include a new community at St George's is entirely flawed.

Bullet Point 2.

1.1.6. "Providing locally accessible employment" - this is seen as a critical factor in the proposed St George's Barracks project. However, the document provides little detail or confidence in the ability of RCC to deliver such a hugely significant level of employment, which in reality is largely outwith the responsibility or competency of the Authority. This is therefore solely an aspirational statement. Housing built in St George's Barracks is unlikely to be sustainable in terms of employment in this very isolated site with little employment infrastructure. The current paucity of high technology employment and industrial capacity and capability within the County would suggest that attracting sufficient employment to this remote site will require vision and dedicated effort. Positive, imaginative suggestions for employment opportunities that would be appropriate for the specific location have been ignored by RCC. It is of interest to note that the local employment forum suggests that current industry does not seek new employment sites, solely inexpensive accommodation for their staff based in Oakham and Uppingham.

1.1.7. [There is insufficient detail contained in the Local Plan document to explain how the needs of new residents at SGB will be met in terms of employment, transport, leisure etc.](#) In summary, although the vision of "locally accessible employment" is admirable, we question whether it will be achievable under RCC's current approach.

QUESTION TWO: CAN YOU SUGGEST ANY AMENDMENTS TO STRATEGIC OBJECTIVES 1 AND 12 (PAGE 12)

Spatial Strategy Strategic Proposed Objective 1.

1.2.1. Delete: “including the creation of a new sustainable community at St George’s.”

1.2.2. The document fails to prove the need for such a development but simply strives to create a rationale for building a new town on an available site ex MoD site. The site is outside the County’s current established planning guidelines and spatial strategy. The paragraph should be deleted on the following grounds:

- **Protection.** A development of this size is entirely inconsistent with the stated objective of “*protecting the natural environment, heritage, landscape, the unique character and identity of the towns, villages and countryside*”. Such a development would swamp the villages of Edith Weston and North Luffenham entirely changing forever their rural nature, character and heritage. In spatial terms the development would seriously damage the visual and environmental amenity of the whole surrounding area.
- **Infrastructure.** The development would have a significant adverse impact upon local roads and the wider infrastructure of the area. Roads in Normanton, Edith Weston, Ketton and Manton and around Rutland Water cannot take the proposed increases in traffic density without significant new works. Any such new works would have an adverse effect on “*the unique character and identity of the towns, villages and countryside*”.
- **Environmental Impact.** The proposed development is likely to have a significant impact on the high value environmental, ecological and heritage aspects of the site over a period that could extend beyond 40 years. This development is contrary to the County’s long established Spatial Strategy and must be challenged.
- **Sustainability.** There are severe reservations about the site’s suitability to sustain a large community especially in respect of employment, potentially leading to the creation of an unnecessary and unwanted dormitory town located well away from the County’s existing towns and larger villages. There is no evidence that reasonable alternative uses for the site have been seriously considered. There is no evidence currently available regarding the sustainability of the site for the scale of housing development currently proposed.

1.2.3. Rutland is a Rural County and placing a large modern housing estate, the size of a small town, in such a remote location is completely out of character with the rural nature of the County.

Spatial Strategy Strategic Proposed Objective 12.

1.2.4. Include within Objective 12 the requirement for any 'Brownfield development' to similarly protect the environment and diversity on sites of value, in terms of ecological, heritage and natural habitat, ensuring the delivery of a net gain in biodiversity, a NPPF requirement. Green sites (largely meadow grass) that have lain undisturbed for an extended period should not be classified as brownfield and should be afforded similar protection to the countryside as a whole.

1.2.5. Any development on the site should be constrained within the existing 'built area' of the barracks. RCC's own adopted policies do not support the contention that the whole of this site is 'brownfield land'.

1.2.6. The area of the present Golf Course and Playing Fields should be retained as open space as:

- These are existing leisure facilities – see reference to NPPF above.
- The current golf course will form a well-established barrier between housing development and the proposed quarry.
- This area should also not be classified as brownfield land as it has already been restored from its former use within the airfield

QUESTION THREE: CAN YOU SUGGEST ANY AMENDMENTS TO STRATEGIC OBJECTIVE 2a – NEW SUSTAINABLE COMMUNITY AT ST GEORGE'S?

1.3.1. As noted above, the case for the creation of a new sustainable community at St George's has yet to be proven. There are real concerns that the site can never meet the criteria that need to be applied to a sustainable community. There is no evidence presented by RCC that the site can deliver sufficient employment to be sustainable, the current local infrastructure, including public transport is entirely unsuited to the level of growth identified, and there is real potential to create a dormitory town which would add little or no value to existing communities in Edith Weston and North Luffenham or indeed the County as a whole. Without sustainable employment, the site will attract families that commute to work in other areas, such as London, Peterborough, Leicester, Corby etc increasing traffic densities, congestion and pollution. Equally, without sustainable employment the site will do nothing to address the current affordable housing shortage for low paid workers within the County who cannot afford to live in an isolated location.

1.3.2. The plan does not provide sufficient evidence of the infrastructure enhancements, for example roads, water, sewage, electricity and internet connections, that will be needed to support a development of this size.

QUESTION FOUR: CAN YOU SUGGEST ANY AMENDMENTS TO THE STATEMENT ABOUT DELIVERING SUSTAINABLE GROWTH TO 2036?

1.4.1. The sentence in bold has no substantiation in respect of the development on the site of the former St George's Barracks, it just appears to have been added to the previous proposals without any justification. It should be deleted.

1.4.2. Bullet 1 – Delete 160, insert 130, which is the latest OAN for the County. Unless and until RCC can provide a clear explanation as to why it has chosen to ignore the government's revision to the figure of 160 for Rutland to 130 homes per year, the figure of 160 should be amended to 130. This 19% apparent increase in planning for housing is significant in our small county, and needs to be fully justified before it will be considered acceptable.

1.4.3. Bullet 2 – The plan purports to allocate 30 hectares of new additional employment land. We note that the current draft Masterplan allocates 14 hectares of the St George's site to employment, while the current draft Local Plan allocates 25 hectares. It is not clear therefore how the figure of 30 hectares is derived, or how it is proposed to distribute this allocation.

SECTION 2 IMPLICATIONS FOR THE SPATIAL STRATEGY AND SETTLEMENT HIERARCHY

QUESTION ONE: CAN YOU SUGGEST ANY AMENDMENTS TO THE SETTLEMENT HIERARCHY?

2.1.1. With the exception of St George's Barracks development the settlement hierarchy makes much sense, with development focused in developed areas where it can be sustained through employment, facilities and infrastructure appropriate to their position in the Settlement Hierarchy. The proposal to build at St George's Barracks is not proven in respect of need, suitability or sustainability, so that its appearance in the hierarchy is questionable. Certainly, for reasons already set out, details of the proposed new settlement should not be included at this stage, as they have not been agreed. For consistency with the other descriptions, the St George's land should be listed as "previously developed land at MoD North Luffenham", i.e. its current status.

2.1.2. The isolated location of St George's Barracks means that it is not a suitable site on which to build a major new development and is totally contrary to Rutland's long established and successful strategy that the majority of development should take place in Oakham, Uppingham and the larger villages (the Spatial Strategy).

2.1.3. The proposed housing developments in Oakham, Uppingham and the larger villages laid down in the draft 2017 Local Plan and transferred to SGB at Table 2, might still be needed and could be sought through Neighbourhood

Planning initiatives. Inadequate consideration has been given to the need for future growth in Oakham and Uppingham, which will have a significant impact on the vitality and future commercial viability of our principal towns.

2.1.3. The revised Spatial Strategy suggests that a 'New Town' is needed to meet the future housing needs of the County. However only one site, St George's Barracks, is identified within the proposals made. The Plan should seek to identify any further sites that might be suitable and available or state that St George's is both essential to the revised hierarchy and the only site that could be considered. No consideration appears to have been taken to identifying any practical alternative sites for such a development.

2.1.4. Strategic Objective 1 of the spatial strategy (Para 2.5) states: *"to provide an opportunity to access services and facilities locally, to minimise the need to travel, and to protect the natural environment"*. It is clear that the proposed new development in an isolated location, with a high environmental value, away from the main Towns and local Service Centres is entirely at odds with that key objective.

QUESTION TWO : CAN YOU SUGGEST ANY AMENDMENTS TO POLICY RLP3?

2.2.1. The plan covers the period to 2036, it would appear to be irrelevant to predict development beyond that date. The local plan proposal should be to build up to 1,200 new homes (if the OAN of 160 can ultimately be justified) in the period to 2036. Development beyond this would be subject to review in future plans.

2.2.2. The draft strategy refers to an undefined "New Settlement", rather than the more obvious "New Town", which a development of up to 3,000 new homes would be. The revised RLP3 treats St George's as being smaller than Uppingham, however should the proposals in the plan be enacted, it will be similar in area but significantly larger in population. It is however clear that it will have significantly fewer facilities than a town such as Uppingham would merit.

2.2.3. The case for the site is not proven and the proposal runs counter to the previously agreed spatial strategy and as previously stated, suggests the development of a new settlement of 1,500 to 3,000 new homes in a totally isolated position in the rural heart of the County. Whilst a case could potentially be made to create another 'typical Rutland Village' (Max 500 homes) on the site, this has not been made effectively, and certainly no case has been made to create a huge modern housing estate (settlement) in such an isolated and unsuitable position.

SECTION 3 IMPLICATIONS FOR HOUSING REQUIREMENTS ACROSS RUTLAND

QUESTION ONE: DO YOU SUPPORT THE PROPOSED CHANGES TO THE DISTRIBUTION OF HOUSING DEVELOPMENT SET OUT IN TABLE 1?

Yes	
No	X

3.1.1. Table 1 appears to be flawed in that it fails to bring forward the correct figures from the 2017 draft revised Local Plan. Assuming an OAN of 160 houses per annum (which is potentially flawed – see below), and ignoring the 600 houses proposed at Quarry Farm, the correct figures for the table should be as follows:

• OAN 2011-2036 (Table at para 5.19, July 2017)	3320
• Less completions 2011-2018 (833+499)	(1332)
• Less commitments as at 2018	(795)
• Total deductions	(2127)
• Therefore requirement for new planning consents to 2036	1193

3.1.2. If the 600 homes planned for Quarry Farm are also taken into account (reduction of 600), and the OAN is reduced to 130 homes per annum (20 years at 30 fewer = reduction of 600), there is no need for any further planning consents at all! Thus case for a need to develop St George's Barracks runs counter to the 2018 Objectively Assessed Need (OAN).

QUESTION TWO: CAN YOU SUGGEST ANY AMENDMENTS TO THE DISTRIBUTION OF HOUSING DEVELOPMENT?

3.2.1. The 2017 Local Plan meets the future housing needs of the County for the period to 2036 and should be retained. [RCC proposals for future housing need are flawed and ignore recent Government advice as to how many homes Rutland needs in the future.](#)

3.2.2. It is already clear that the developments cut from the draft 2017 Local Plan to create headroom for a development at St George's Barracks are still likely to be put forward for consideration in the period of the Plan. This argues against the high-handed transfer of future housing allocations from these towns to a new development at St George's.

3.2.3. "Windfall developments" in the villages are an essential element of the natural evolution of village communities, which should be included in the Local Plan. The current consultation document proposes not to include any allowance for windfall sites, stating that "opportunities for such sites to come forward are reducing". This is in direct contrast to the statement at para 5.20 of the 2017 Consultation Draft Plan, which refers to a Small Site Windfall Study commissioned by RCC, which concluded that "a significant proportion

of our supply of small sites over the past 10 years has been windfall”. A small site windfall supply of **680 dwellings** was included within the total housing supply presented in that document (at Table 1) for reasons “as set out in the study”. The current consultation document gives no credible justification for now seeking to disregard this study, and as such we see no reason for excluding windfall developments from the Local Plan.

The new plan will discourage development in villages, which is an essential part of the normal development of these communities.

3.2.4. The proposed development is simply not needed, or if a stronger case can be made, it should be at a greatly reduced level, as noted throughout this response.

QUESTION THREE: DO YOU SUPPORT THE PROPOSED CHANGES TO HOUSING REQUIREMENTS SET OUT IN TABLE 2?

Yes	
No	X

Please use this space to tell us your views about these changes

3.3.1. Table 2 offers no useful further information, and is at best confusing. It is unclear why, when both papers assumed a need for 160 new houses/annum, over the period of the plan an additional 230 are now apparently required.

3.3.2. NLPC understands that when the St George’s site is vacated by the MoD, it will be important that an appropriate use should be found for the land. However we agree with CPRE that housing development at St George’s Barracks should, at least initially, be contained within the existing built up area of the site.

SECTION 4 IMPLICATIONS FOR MINERALS AND WASTE ISSUES

4.1.1. Mineral extraction at the site will have a significant environmental impact, which needs to be carefully assessed. The issue of appropriate “buffer zones” does not seem to have been adequately addressed nor the health implications for residents living cheek by jowl with a developing quarry of enormous scale for a period of up to 40+ years. Buffer zones are needed for a number of different reasons include landscape, ecological and heritage buffers. There is no evidence that a contractor can deliver on the phasing of the quarry and complete restoration of the site and its habitat within reasonable time constraints.

4.1.2. Evidence is needed that the contractor responsible for the extraction of minerals can deliver the restoration of the quarry site and the phasing of the

Country Park as identified in the initial Masterplan, before that part of the Masterplan can be agreed.

4.1.3. The detail contained within the plan regarding waste management is shallow and needs much further development. The environmental impact of building a new town in the heart of the country cannot be underestimated. *The plan does not give sufficient weight to the potential impact to the local environment in terms of added pollution, waste, wildlife and ecology.*

SECTION 5

PROPOSED NEW POLICY FOR ST GEORGE'S

QUESTION: CAN YOU SUGGEST ANY AMENDMENTS TO THE PROPOSED NEW POLICY FOR ST GEORGE'S?

5.1.1. The current proposal to create a large new settlement and build up to 3,000 new homes on the site of St George's Barracks is totally unacceptable. Following the initial Masterplan consultation the opinion of the local community was clear and unambiguous, but the view of the local communities has not been reflected in this consultation document.

5.1.2. The area is isolated from the 2 main towns and simply cannot be a sustainable community in the way envisaged. There is no confidence that RCC can create sufficient jobs to deliver a sustainable community and therefore the proposals will result in a huge level of commuting both inside and outside the County.

5.1.3. No evaluation of alternative options for the development of the MoD site have been provided within the proposals to date. *Insufficient imagination and thought has been given to the future use of St George's Barracks, with little consideration being given to using the space available to enhance tourism, education, leisure activities, energy production (solar energy) and industry.*

5.1.4. Traffic levels will increase substantially on both local roads and on major trunk roads in particular A1, A47 and A43, and the environmental impact will be hugely significant. *The plan does not provide sufficient evidence of the infrastructure, including roads, which will be needed to support a development of this size.*

5.1.5. It is clear that the local communities do not support the proposals being made in the revised local plan document. It is accepted that some development may need to take place on the currently developed administrative site, but the ecological and environmental value of the curtilage cannot be underestimated.

5.1.6. Notwithstanding the proposed quarrying of much of this area – it is an important ecologically rich area which should be protected. This is a priority habitat type within the current Leicestershire and Rutland Biodiversity Action Plan, appropriate weighting needs to be given to its importance

The plan does not recognise the important and unique ecological value of the undeveloped area of the airfield (a limestone grassland area of significant regional importance).

5.1.7. On the RCC Website, the Leader of the Council is quoted as saying that the consultation on the Masterplan showed: *“widespread concern for the number of houses that were proposed for the development, particularly for the impact on surrounding villages”*. This is an accurate assessment of local feelings, however this proposed update to the Rutland Local Plan does not reflect this widespread concern. The proposals made in the initial Masterplan circulated in Jun 18 were rejected convincingly by the local population and should not therefore be considered as an acceptable way forward, as purported within the consultation document. There is clearly no support locally for a project of the size suggested within the consultation document.

5.1.8. In summary, it is NLPC’s contention that Policy RLPxxx should be withdrawn, and replaced with a policy which is Right for Rutland, i.e. which returns to control by the existing strategic Local Plan Policies for Rutland. Furthermore the scale of the development should be held within the current OAN figure for the whole of Rutland, which should then be taken as a maximum level of development within the county.

**NORTH LUFFENHAM PARISH COUNCIL
FORMAL RESPONSE TO CONSULTATION DOCUMENT
RUTLAND LOCAL PLAN REVIEW
ADDITIONAL SITES**

1. Having reviewed the subject document, NLPC note that a total of 48.83ha of potential building land has been identified that already passes Sift 1 and Sift 2, of RCC planning procedures, which we understand are the most stringent tests. The proposed sites are therefore likely to be deemed acceptable in principle for house building. If a density of 29 homes/hectare was to be applied (as identified in the Initial St George's Barracks Masterplan), this would create capacity for a further 1,416 homes, over and above the established OAN. This additional untapped resource reinforces the case that a development at St George's Barracks is simply not needed to meet the future housing need of the County in the period to 2036.

2. Site Reference: ED103 – Officers' Mess, Manton Road, Edith Weston.

The St George's Barracks (SGB) Officers' Mess Site is an integral part of the proposed St George's Barracks development. We consider that it is inappropriate to consider this site in isolation from the whole of the SGB development.

3. Site Reference: SOU04 – Wireless Hill Employment Site, South Luffenham.

Wireless Hill Industrial Site is currently an efficient and effective industrial site. We would support further development on the site to maintain and enhance the efficiency of those organisations that have invested in the site over many years. It provides much needed employment opportunities close to both North and South Luffenham.

ADDITIONAL SITE

4. To ensure that St George's Barracks goes through the same scrutiny as other sites, it should be included as an additional site within the Rutland Local Plan.