

SGB/NLPC/Masterplan

8th Jan 18

See Distribution

**NORTH LUFFENHAM PARISH COUNCIL
RESPONSE TO EVOLVING MASTERPLAN DOCUMENT – EDITION E**

Reference:

- A. Regenco – Evolving Masterplan Document – Published Nov 18.
- B. NLPC Response to SGB Masterplan – Dated 14 Jun 18

INTRODUCTION / STYLE.

1. The document has been prepared using an A3 colour template which has proved challenging for most individuals that have attempted to read the document in full. The format is not suited to small laptops, tablets or mobile telephone screens. The single A3 Black/White 'hard' copy provided to Parish Councils makes it hugely difficult to interpret the colour diagrams. It is requested that future iterations of the Masterplan are provided in a more appropriate format.

2. The Executive Summary is too simplistic and lacking in any detail, and many have found the full document to be too long and repetitive. The lack of paragraph numbering within the document makes it difficult to relate comments with specific areas of the document.

3. The Key Concerns raised within the village relate to:

- The scale of the proposed development.
- We remain unconvinced by the commitments made in respect of employment on the site. Any failure to deliver the promised level of employment will have a significant impact on the sustainability of the site.
- Rate of proposed building which is not specified, though forms part of the proposed Local Plan consultation (1,200 homes over a 10 year period to 2036).
- Lack of visibility of the financial viability modelling that has resulted in the decision to build 2,215 homes on the site, excluding those on the Officers' Mess Site.
- The long term environmental impact of the project upon the local communities.
- Impact of the proposed development upon house prices throughout the County but in particular in the adjacent villages.
- How can the public influence the next stages of the Masterplan?

More detailed comments set against the headings within the plan are at Annex A to this document.

EXECUTIVE SUMMARY

4. It is difficult to criticise a plan which appears to be the “Utopian Dream” of an enthusiastic Town Planner drawing upon best practice guidelines and aspirations. It is based on the ‘ideals’ of Jan Gehls, a Danish architect for cities. There is little confidence that the proposals will be implemented by a developer in the way envisaged. However, the issues that we would wish to bring to the attention of RCC Councillors can be summarised thus:

- a. **Officers Mess.** The Officers’ Mess site must be recognised as an integral part of the overall St George’s Barracks (SGB) development proposal and not disregarded or set to one side as a separate development.
- b. **Scale.** The scale of the development, a new town, larger than Uppingham of 2285 (2215 and 70) dwellings remains unacceptable to the community and cannot be justified with the existing Local Plan. The evolving Masterplan represents a Windfall Development of 2285 dwellings on land which is designated as “Open Countryside” in our adopted Local Plan. Therefore, no site allocation has been allowed for it, and such a development should not be countenanced under any circumstances because it is entirely contrary to all relevant strategic policies in the Adopted Core strategy DPD and in the Site Allocations & Policies DPD
- c. **Woolfox.** The evolving Masterplan makes no reference to the potential Woolfox development which is broadly seen as more appropriate and deliverable without significant public financial risk.
- d. **Financial Modelling.** The lack of visibility of a robust financial model means that the financial viability of the project cannot be accurately assessed. The Financial model has driven the decision to build such a large development. With no visibility of this model, we can have no confidence in the outcome. Though the site is currently in public ownership, the Treasury will demand an appropriate financial return, which, when taking account of the enormous and unquantified coast of de-contaminating the site, together with the proposed high quality of the development, the cost of developing its infrastructure and the cost of maintaining the site will have a significant impact upon the unit cost of the dwellings proposed, potentially making even the smallest units unaffordable to many lower paid workers.
- e. **Pace of Development.** Though not specifically mentioned within the evolving Masterplan, there is concern about the pace of development necessary to create an initial critical mass of the community to justify the opening of a new school, medical facilities, public transport links, shops, community facilities etc. The Local Plan SGB proposals establish a requirement to build 100 dwellings/annum and suggest that by 2036 a total of 1200 dwellings will have been built. If this rate of building is enhanced to create a viable community, it will have a significant impact upon other aspects of the Local Plan with a potential oversupply of new homes within the County or a moratorium on house building outside the SGB development. To build a

new community on a single site over 20 years will be hugely disruptive to both existing communities and new residents. How many families wish to bring up their families on a building site for their childrens' whole childhood?

f. **Quarry Development.** More certainty needs to be established regarding the viability on the overall project and the indicative time frame for the development of the proposed massive adjacent quarry, which will potentially blight the site for many years. Little is said within the evolving Masterplan about the proposals for mineral extraction. Within the evolving Masterplan a Hotel development is suggested next to the quarry boundary and the Sports Fields are built within the quarry boundary.

g. **Consultation and Collaboration.** The evolving Masterplan talks of strong collaboration with local communities, yet the authors of this Masterplan have not spent time with the Parish Councils of the communities most affected to discuss their ambitions and reservations and to visit the respective villages. This has resulted in a perceived arrogance by the Masterplan authors and an unwillingness to really understand local concerns.

h. **House Prices.** There is significant concern that the sheer size of this development will lead to local oversupply of housing. As intimated within the evolving Masterplan (Page 11) – “all house prices will be mitigated”, this has the potential to significantly impact upon a fragile housing market leading to a reduction in house prices throughout the County. Whilst making housing more affordable for some new buyers, it will leave numerous others with negative equity and the inevitable financial and social pressure that that will bring.

i. **Housing Density.** The proposals in respect of housing density are unacceptable and do not accord with the recent commitments by both MoD and RCC in December 2018. 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.

j. **Environment.** Our environmental advisor has yet to fully analyse the environmental and ecological proposals contained with this draft of the masterplan. However, it is clear that little further progress has been made in respect to our concerns raised in the initial consultation exercise, which were:

i. The impact of the proposed development to the environment so close to the Rutland Water SSSI and SPA cannot be underestimated and needs continuing careful assessment.

ii. The airfield element of the site is some 200+ha in extent. As a closed military training area it has still not been subject to a full ecological survey. The results of such a survey are needed before development proposals are finalised.

iii. **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.** This should be included within the Masterplan.

iv. We are also still 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'.

v. 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.

g. **Job Creation / Employment.** As previously stated, the evolving Masterplan still lacks any imagination or credibility in respect of job creation. The lack of an effective industrial base, infrastructure or heritage does not bode well for the future. If some 2,000 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, 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 real progress in attracting high value businesses to the site or a real commitment to build on Rutland's important and vibrant leisure and tourism industries.

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SPECIFIC COMMENTS

Page No	Section	Topic	Comment / Concern
(a)	(b)	©	(d)
5	Introduction	Purpose	Consultation. No comment is made of the specific SGB consultation exercise conducted in Aug/Sep 18, which seeks to identify the Public's attitude to a development at SGB.
5	Introduction	Process	Consultation / Collaboration. The evolving Masterplan identifies having built a strong team of collaborators Who are these? At no time have the authors met with the local Parish Councils to discuss ambitions/ concerns relating to the site. I would suggest that collaboration could be seen in a different context!
5	Introduction	Process	Community Engagement. This is inaccurate and suggests a far greater level of engagement than exists. The Consultants have yet to meet the most affected Parish Councils to discuss their ideas.
7	Overall Vision	Vision	Regeneration. "Regeneration will result in a community where residents live and work" Whilst a sound proposition, within this rural community this is hugely challenging and will require the creation of a significant number of new jobs on the site. As identified in the Bordon development, experience elsewhere suggests that the majority of residents will need to commute to work
9	Policy Context	The Housing Crisis	Housing Density. The evolving Masterplan seeks to avoid high density poor quality estates – But then proposes creation of housing densities unseen locally !!
10	Policy Context	Solving the Housing Crisis - The Solution	House Prices. "All house prices will be mitigated in the region" – is this

			really to be RCC policy? If so it needs to be publicly stated.
11	Policy Context	Housing White Paper	House Prices The evolving Masterplan suggests that house prices (affordability) will be mitigated by building more houses quickly. How will this impact upon the Local Plan? Will it result in a housing moratorium elsewhere or a glut of houses throughout the County.
11	Policy Context	Housing White Paper	Affordability Ratio. ONS paper suggests that Rutland Houses Prices now fall within the same band as South Holland, South Kesteven, South Northants and East Northants and broadly in line with England and Wales Average. House Price affordability ratio has not increased as significantly as it has elsewhere locally. (NB Average Council tax rate at £1568 is almost the highest in the Country – How will that affect affordability)
12	Policy Context	Local Policy	Housing Density. RCS Policy CS10 states that 40 dwellings/hectare is acceptable and 30 dwellings / hectare in villages. On this large rural site where land is not at a significant premium, we should be aiming to achieve a much higher quality of development than that laid down in CS10. Density should therefore be no more than 30 houses / hectare on any of the development.
12	Policy Context	Local Policy	Parking. The evolving Masterplan needs to take account of the isolated and very rural location of the development – sufficient parking needs to be built into the equation. Almost every garage locally is used for storage/recreation/extension etc
13	Placemaking	The Approach	Community Involvement No consultation has yet taken place between consultants and local Parish Councils, though paper admits that local residents provide the greatest insight.

13	Placemaking	A Small Community	Size of Communities. The evolving Masterplan needs to recognize that the proposed development is hugely significant in Rutland, as it will be larger than the County's Second Town, Uppingham, and more than twice as large as any other village. Within such a small County it will impact upon the whole of the County's infrastructure both physical and social.
14	Placemaking	Working Community	Employment. The evolving Masterplan highlights the requirement to find new employment opportunities in SGB site. The attractiveness of Rutland as somewhere to live rather than to work has the potential to create further commuters out of the County. London, Leicester, and Peterborough are easily commutable from SGB. Recent strong advertising of Rutland properties in London papers reinforces this. The danger of SGB becoming a commuter dormitory town cannot be ignored.
14.	Placemaking	Demographics	Demographics. Comparison with UK as a whole is irrelevant and as suggested Rutland's demographic reflects its position as a rural county. No mention is made of the significant financial and social benefit brought to the County by the older generation.
16	Placemaking	Spaces	Rural Landscape. No mention is made of the significant impact that a huge development such as that proposed, will have upon Rutland Water and its environs.
18	Placemaking	Townscape	Housing Density The key issue here is that the Housing Density of both neighbouring villages are far less than those proposed for the new development. The Ancaster Way development in North Luffenham at 24 DPH is considered to be only just acceptable for most local residents

21	Placemaking	SGB – Then and Now	SFA Units (Quarters) No mention is made of the significant number of MoD houses considered surplus to requirements and now rented commercially.
21	Placemaking	SGB – Then and Now	Community Facilities. No mention is made of the limited community facilities in North Luffenham and Edith Weston. Community facilities in SGB will need to meet the needs of a broader existing community .
22	Placemaking	The Landscape	Drystone Walls. It is suggested that intensification of farming has led to a loss of drystone walls. Has there ever been a significant number of dry-stone walls in the County?
37	A Community for Life	Need for Homes	“Community could particularly address housing needs and identified shortfalls in Rutland and the wider Peterborough sub region.” This is of particular concern unless well managed. Unless the relationship between housing and employment is considered as a top tier priority, there is a real concern that a low-cost housing ghetto for the unemployed or alternatively a dormitory commuter town will be created, which will not meet the stated aspirations of this project.
38	A Community for Life	Aspirations	Some outstanding words, but are they achievable in reality. Social engineering is a complex issue and is hugely fallible. The promises made here have failed to materialise in many other new developments. RCC must adopt an approach of continual audit to ensure that the promises are kept from the outset and in perpetuity.
39	A Community for Life	Governance	Community assets. Whilst supporting the proposal that high class community assets should be provided and have reliable sources of revenue income for their long term management – the reality in communities up and down the country is that the reality is that is

			very difficult to achieve. This is especially apposite in such a relatively small and isolated rural location.
40	A Community for Life	Density	The proposed housing densities do not reflect the commitments that have been made by RCC and this should be addressed as a matter of priority. Densities exceeded 35 DPH are totally inappropriate for this development. The local vernacular provides clues for the art of the possible.
48	Feedback	Key Themes	<p>It is interesting to note that the key issues in the development have not changed from our response to the initial Masterplan in Jun 18 (Reference B). Though some cognisance has been taken of local views in the revised plan others have not been addressed successfully. Key issues within the local community remain:</p> <ul style="list-style-type: none"> • Scale • Proposed Character / Design • Infrastructure development esp roads • Public Transport • Employment and job creation • Car Parking • Protection of the environment • Impact of mineral extraction • Duration of build / mineral extraction • Impact on Rutland Water • Location of School • Further education provision • Limited scope of tourism opportunities • Leisure facilities / Community Centre • Future Governance arrangements • Inclusion of Officers' Mess site as an integral part of the development and not isolated as a separate project

			The failure of the Consultants to meet local Parish Councils and residents means that most believe that their concerns have been ignored. This document does little to assuage these concerns
53	Revised evolving masterplan	Rationale	School. As discussed on numerous occasions, the location of the School on Pennine Drive is considered inappropriate and undesirable.
54	Revised evolving Masterplan		<p>The revised proposals in the evolving Masterplan are broadly welcomed, however there are still significant areas of concern as listed within this document.</p> <p>The rationale for creating a new 3 - form entry primary school are not fully understood, especially in terms of timing. There is concern locally that there is a longer-term plan to relocate Ketton and Empingham Schools at SGB. If this is not the case it needs to be stated very clearly now.</p>
55	Revised evolving Masterplan	Transport	Site Access. Bearing in mind the need to enter / exit Edith Weston is Pennine Drive the most appropriate access route. Every effort should be made to limit access via this route. The Wytchley Warren Lane provides a sub-optimal alternative direct access from Normanton Road would appear to be a more appropriate route.
56	Revised evolving Masterplan	Transport	Bus Services. Whilst excellent proposals, are these really realistic and will they actually be provided and supported? The level of proposed service exceeds anything currently available, no evidence exists to show that the proposals made will be implemented regardless of cost. Provision of the proposed level of Services are considered inadequate but nevertheless will require a substantial subsidy especially in the early stages of the project until a

			critical mass is established in the new development. The proposed 100 residences / annum build rate as identified in the consultation Local Plan document may make this proposal unsustainable. Any increase in the proposed build rate will have a significant impact upon the current and revised draft local plan.
57	Revised evolving Masterplan	Healthy Approach to Street Design	It is interesting to read the planners “ambition for all residents of the new community to walk or cycle for 20 minutes every day”. If this means building in significant distances between homes and car parking spaces etc, the reality is likely to be somewhat different. Any lack of parking facilities near shops and community facilities will discourage their use. Human nature has a subtle way of frustrating such proposals to change behaviour. Much of this suggests a new city development rather than a new rural village in the heart of the County.
58	Revised evolving Masterplan	Community Facilities	School. We believe that the School should not be located off Pennine Drive but closer to the proposed village/town centre.
58	Revised evolving Masterplan	Community Facilities	Community Schools. The County Council had historically moved away from the creation and management of Community Schools such as that in North Luffenham, preferring that Community and School facilities are kept separate. Is this an agreed change of RCC policy?
59	Revised evolving Masterplan	Building Heights	The extent of proposed building above 2 storeys is not fully established in the paper but should be very limited to match the Rutland vernacular. 2.5 storey buildings should be exceptional to meet specific agreed requirements. There should be NO 3 storey buildings
59	Revised evolving Masterplan	Density	The proposed housing density, in particular in the centre of the development is unrepresentative of

			any Rutland village – and is entirely unacceptable. RCC have made very clear commitments in this regard. The aim must be to replicate a Rutland village not to create a modern monstrosity.
60	Revised evolving Masterplan	Affordability	The paper suggests a much higher affordability ratio in Rutland compared to local areas – this is not entirely borne out by the ONS statistics which show that the affordability ratio for Rutland is relatively stable whilst adjoining areas have increased significantly over the past 10 years. Rutland sits in the same affordability ratio as most of its neighbours. House prices in Rutland compare favourably with other areas when considered on a like for like basis. The rural nature of the county is such that direct comparison with Urban areas such as Peterborough and Melton are inappropriate. Statistically Rutland is too small to compare directly with the much larger local areas.
60	Revised evolving Masterplan	Affordability	Affordability Policy. This is a hugely complex area that requires much further research, with full community engagement. No indication is made of who will fund the proposed affordable homes, if affordability is to be created by reduced size and quality there is a real danger of creating a ghetto at the heart of the new community. No indication is made as to how affordable homes will be secured for local people rather than made available on the open market. (The Market rent of a 1 Bed Flat in Peterborough (supposedly more affordable than Rutland) is circa £600pm)