

PD12597/JWB/LH

email: jon.bradburn@montagu-evans.co.uk
lauren.hawksworth@montagu-evans.co.uk

70 St Mary Axe
London
EC3A 8BE
Tel: 020 7493 4002
www.montagu-evans.co.uk

04 October 2022

North Luffenham Parish Council

[by email and online form]

FAO: North Luffenham Parish Council

THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012 NORTH LUFFENHAM NEIGHBOURHOOD PLAN 2022-2037 PRE-SUBMISSION VERSION – PUBLIC CONSULTATION

On behalf of our client, the Defence Infrastructure Organisation (“DIO”), please find enclosed representations to the Pre-Submission Version of the North Luffenham Neighbourhood Plan. For ease of reference, the representations are structured in response to the matters as raised in the consultation document alongside relevant background to provide context.

Background

The St George’s Barracks site was identified by the Ministry of Defence for closure as part of the Strategic Defence Spending Review (2015) and the MoD’s Better Defence Estate (2016). Site operations are beginning to halt, and the barracks is currently subject to a phased vacation which is expected to be completed by 2025.

The Site represents the largest single brownfield development opportunity in Rutland and was allocated for redevelopment as a large sustainable residential community in the (now withdrawn) emerging Local Plan 2018 – 2036 (Policies H2 and H3).

Throughout the Local Plan preparation process, the DIO held discussions with the Council, Parish Councils and local community to explore the site’s ability to be developed. The Site successfully received Garden Village status based upon masterplanning work undertaken in conjunction with the Council and received Housing Infrastructure Support (HIF Funding) from Homes England.

The Council resolved to withdraw the Local Plan in September 2021 having rejected HIF Funding that would have helped to realise the long-term development of the site for over 2,000 homes. This is the principal reason why the plan was withdrawn; the supporting evidence base and conclusions on the suitability of St George’s Barracks remain valid and should continue to be used through the new Local Plan process.

The DIO are continuing to explore the future opportunity for St George’s Barracks and are engaging with Rutland Council through the formal pre-application advice service. Formal representations have also been submitted to the new Rutland Local Plan public consultation.

North Luffenham Neighbourhood Plan

The North Luffenham Neighbourhood Plan Pre-Submission Draft document sets out the aims, vision and planning policies of the Parish, to coordinate with the new Rutland Local Plan. A particular focus of the Neighbourhood Plan is to ensure that sustainable growth and development, particularly in the St George’s Barracks area of the parish, will comply with design codes and master planning as referred to in the Plan.

The Neighbourhood Plan will go to an Independent Examination and will be subjected to a local Parish referendum. For the Neighbourhood Plan to be accepted it will require the majority vote in the referendum. In the event of this majority “yes”, Rutland County Council will proceed to make (legally adopt) the Neighbourhood Plan for the Parish of North Luffenham.

Once made, the Neighbourhood Plan will form part of the statutory development plan together with the adopted Local Plan and will be given weight in the determination of planning applications.

It is therefore important that the Neighbourhood Plan continues to recognise the potential development of St George's Barracks as a brownfield site with significant opportunity to deliver a new residential and community development on previously developed land.

The Neighbourhood Plan Pre-Submission version presents a series of proposed Policies numbered NL1 to NL11. These representations have been framed in response to these draft policies.

Policy NL1: Employment and Community Facilities

Policy NL1 seeks to support development which diversifies the rural economy and the range of community facilities. The Neighbourhood Plan supporting evidence identifies the existing facilities and services, including a community centre, a church and The Oval, a designated local green space. The Neighbourhood Plan states that these are valued by residents of the parish and fundamental to maintaining a good quality of life.

The DIO are supportive of Policy NL1 and agree that existing community facilities and services should be protected and enhanced. Any future development at the St George's Barrack's site would incorporate a mix of development, to benefit new and existing residents, including those from North Luffenham.

Policy NL2: Broadband

Policy NL2 seeks to ensure that new development, including employment space and new homes includes high speed fibre optic cable broadband infrastructure.

The DIO are supportive of this policy.

Policy NL3: Residential Development

Policy NL3 has been designed to give high level guidance on acceptable development locations. The Parish's own community survey identifies a need for future housing development in the village, to provide a range of property types to meet the needs of families, downsizers and to include affordable tenures. Future development should be sympathetic and maintain the character of the village.

The pre-text to the Policy seeks to support housing development at suitable locations within the parish, and ensure development is in keeping with the character and setting of the existing housing and landscape.

The Policy itself is clear that new residential development will be supported within the Planned Limits of Development, through the conversion of existing buildings and development which infills gaps within existing built frontages. Any sites which are allocated for residential development and include employment space would be supported.

Encouraging the development of small-scale brownfield sites (circa 5 – 10 homes) is a valuable approach to housing delivery and does offer a meaningful and sustainable supply of new homes, but this is only part of the approach. The NPPF recognises that the supply of a large number of new homes is required and often best achieved through planning for larger scale development, including the previously identified new community at St George's Barracks (as allocated in the now withdrawn Local Plan).

The St George's Barracks site is an existing brownfield site, which will soon cease to operate for its original purpose. The development potential of the Site includes opportunities to create a new sustainable community, through the creation of new homes, new jobs, the re-use of existing buildings, protection of heritage and landscapes, and enhancements which will benefit new and existing communities if planned correctly.

This is the only significant site which can provide a larger scale development to deliver a truly sustainable new community, as demonstrated throughout Rutland Council's own evidence base documents. The St George's Barracks site is a sustainable, viable and deliverable development site and the largest brownfield site in the County.

The DIO suggest that the policy as worded does not allow sufficient flexibility for future development, including opportunities at St George's Barracks, which is currently not included in the Planned Limits of Development boundary for North Luffenham or Edith Weston. The Neighbourhood Plan refers to the Planned Limits of Development as per the adopted Site Allocations and Policies Development Plan Document, adopted in 2014 and includes extracts from this document, however this will become outdated when a new Local Plan is adopted.

The DIO have made representations, in response to the recent Rutland Council Local Plan Issues and Options Consultation, to require that the Planned Limits of Development boundary should be amended to include the St George's Barracks site. As set out above, the St Georges Barracks site is an established area of brownfield land. As per NPPF Paragraph 119 and Strategic Objective 10 of the Issues and Options Plan, this category of land should be used for development.

The purpose of the 'Limits of Development' boundary is to identify existing built-up areas and brownfield land where development is considered to be acceptable in principle. The St Georges Barracks site clearly meets the definition of brownfield land and is an established area of built form in Edith Weston. It is therefore suggested that the Limits of Development are amended to include the St George's Site which will promote sustainable brownfield development and create a new area of planned growth without encroaching into undeveloped areas of the landscape. This echoes the position in the emerging design guidance for the North Luffenham Neighbourhood Plan (and Edith Weston) which shows development on the St Georges site and includes a Design guide.

In this regard, the DIO suggest that Policy NL3: Residential Development should incorporate a reference to St George's Barracks and should include explicit support for the appropriate development of previously developed land – as advocated by National and Local Planning Policy.

As set out below, the DIO have also requested that a separate policy should be included in the Neighbourhood Plan in relation to future development at the St George's Barracks site, especially given the fact that the Neighbourhood Plan documents include a design guide for the Site, currently without any policy hook to give it weight.

Finally, the DIO would note that Rutland Council have recently published a new consultation in respect of Rutland's Interim Housing Position Statement, which is open to the public between 26 September and 28 October. The DIO would request clarification in respect of how the Parish have evidenced their housing need, in line with Rutland Council requirements.

Policy NL4: Natural Environment

The DIO support the proposed policy and encourage the need to protect and enhance North Luffenham's rural and natural environment.

Policy NL6: Local Green Spaces

The Neighbourhood Plan seeks to designate four new Local Green Spaces. This includes Site LGS3 – Butt Lane. The Local Green Space (LGS) Supporting Document provides the context to this proposed designation. The DIO would raise concern that the LGS document states the status of the lane is unknown. The ownership and status should be resolved in advance of any proposed designation.

The DIO would contest the appropriateness of such a designation for Butt Lane. The purpose of the Local Green Space designation is to provide special protection for important green spaces. Butt Lane, whilst well used and important for walkers, does not constitute a Green Space and should not be designated as LGS3.

The Lane is an adopted highway and comprises a single carriageway with hardstanding, which is required for vehicle access to the DIO owned land (including the north of Butt Lane), and adjoining land uses. Imposing strict policy to prevent all development (or works) except in very special circumstances is unnecessary and does not serve the primary purpose of the lane as highway.

Whilst the lane has green hedges and is well used for walking, it is not appropriate to designate as a Local Green Space. The DIO object to the proposed designation.

Policy NL7: Watercourses and Surface Water

The DIO agree that development should have no overall adverse impact on watercourses, should incorporate sustainable urban drainage and incorporate permeable materials as part of the design.

Policy NL8: Placemaking and Sustainable Design

Policy NL8 provides detail on development type, building heights, mix, local character, reduction in carbon, amenity space, green infrastructure and inclusive design. The DIO are broadly supportive of all elements of Policy NL8 and encourage such a policy which will enhance the quality of future spaces in the village and broader borough area.

The pre and post-text to the Policy refers to the SGB Masterplan and Design Code document, as prepared by the Parish in consultation with professional advisors. However, there is no specific reference in the Policy to this document, and hence it would currently be given limited weight, if development proposals do come forward on the St George's Barracks land.

The DIO would suggest that St George's should be identified as a specific Policy in the Neighbourhood Plan, as set out later in this representation.

Policy NL9: Historic Environment

The DIO agree that development should preserve or enhance the character and appearance of the North Luffenham Conservation Area, and designated and non-designated heritage assets, to avoid the loss of architectural features.

Policy NL10: Landscape Setting and Separation

The DIO agree that development should not harm the protected landscape and important green spaces. The policy should reflect that the St George's Barracks site is previously developed land and ensure that this is appropriately assessed as part of any future development.

Policy NL11: Transport and Movement

The DIO agree that new development should be appropriately planned to incorporate a range of transport modes, including accessible and active travel. The integration of charging points for electric vehicles, secure cycle storage and safe pedestrian routes are all supported.

Highways infrastructure improvements should be determined through appropriate assessment, to ensure the most efficient access for existing and future occupiers.

St George's Barracks

The DIO note that there is not currently a specific policy within the Neighbourhood Plan which refers directly to St George's Barracks (SGB).

The Neighbourhood Plan as drafted includes reference to the future development of St George's Barracks within the supporting text and the work undertaken by the Parish Council to create a St George's Barracks Masterplan Guidance document and Design Code.

The Neighbourhood Plan consultation document acknowledges and accepts that development at St George's Barracks is likely to go ahead in some form. The Parish seek to influence future development of the Site and emphasise the importance of sustainable design. Further, it states that support outweighs opposition to limited development at St George's Barracks, however any future scheme should include significant landscaping to ensure there is a buffer to reduce visual impact of development. Control of traffic and the need for pedestrian and cycle links between the site and surrounding villages, are also important themes.

The DIO would strongly suggest that in order to give sufficient weight to the SGB Masterplan Guidance document, as a material consideration for the determination of future development at the Site, there should be a specific policy for the St George's Barracks site, and reference to St George's as a substantial brownfield site included as part of the other Neighbourhood Plan policies, in line with National Policy.

Summary

The DIO broadly support the objectives and draft Policies identified in the Pre-submission draft of the North Luffenham Neighbourhood Plan document. The military use of the St George's Barracks sites (including main site and officers mess) will cease from 2025, and the DIO has worked at length with Rutland Council and its own advisors to demonstrate that this is the largest available brownfield site in Rutland.

Following the withdrawal of the previous emerging Local Plan, St George's remains a previously developed site which provides the opportunity for a sustainable new community, in line with the proposed new vision and objectives of the Council. The DIO welcome further engagement with North Luffenham Parish, Rutland Council and the surrounding community.

We would be grateful if North Luffenham Parish Council could confirm that our representations have been received and will be considered as part of the Neighbourhood Plan Pre-Submission Consultation. If you have any outstanding queries on this matter, please contact Jon Bradburn (jon.bradburn@montagu-evans.co.uk) or Lauren Hawksworth (lauren.hawksworth@montagu-evans.co.uk) of this office in the first instance.

Yours faithfully,



Montagu Evans LLP