



Rutland County Council

# St George's

Responses to Edith Weston and North Luffenham Concerns and Considerations Paper  
V1.1 – March 2018

16 April 2018

Issue raised	Response
<p><b>ISSUE 1 – MEMORANDUM OF UNDERSTANDING AND THE POSITION OF THE COUNTY COUNCIL</b></p> <p><b>Issue:</b> The concept of the County Council working in partnership with the Ministry of Defence (MOD) through an MOU gives cause for much concern and impacts heavily upon public confidence in the ability of the County Council to deliver a solution that is ‘Right for Rutland’.</p> <p>Were the MoD to act alone in selling St George’s Barracks directly to developers, the County Council would be in a position to judge any planning application on its merits, free from any obligation to assist the MoD with their long term funding priorities.</p> <p>It would also be free to stipulate conditions and limitations on the development in such areas as housing density, employment opportunities, design and content of its individual components. It could also ensure compliance with the Local Plan.</p> <p>The County Council working directly with the MoD under the terms of a MoU creates a large, powerful organization with no external balancing agency. This results in a situation of small parish councils being left to fight this behemoth on their own. It is little wonder that the local population feels abandoned and betrayed.</p>	<p><b>Response:</b> We are happy to address any concerns regarding the Council’s partnership with the Ministry of Defence (MOD), which, at its heart, is a continuation of the close working relationship that has always existed between the local authority and the armed forces in Rutland – albeit with a specific focus on the future of St George’s Barracks.</p> <p>The Memorandum of Understanding (MOU) is now available for all to see on our website. The MOU is not a legally binding document but does underpin the partnership approach between the MOD and the Council.</p> <p>Where the MOD have disposed of sites like St George’s in the past, options for disposal have historically included:</p> <ul style="list-style-type: none"> <li>• Hold the site for potential MOD reuse</li> <li>• Transfer the site to another Government Department (E.g. MoJ to develop a prison)</li> <li>• Sell on the open market (with or without planning permission in place)</li> <li>• Enter into a Joint Venture with an industry partner to explore redevelopment potential</li> </ul> <p>The St George’s MOU is the first of its kind anywhere in the Country and takes the concept of public/public partnership further than the MOD have adopted before.</p>

As a result, it allows RCC (and by extension local communities) to have significantly more involvement in the creation of a masterplan for the site and to be part of the project whole site/whole life.

Since the closure of St George’s Barracks was first announced, we have done everything possible to keep Parish Councils advised of what is happening. At the early stages of the project this included:

**30<sup>th</sup> March 2017** – meeting with Parish Councils to advise we were working with MOD to discuss the future of the base.

**17<sup>th</sup> July 2017** – a presentation to the Parish Council Forum highlighting that we were exploring a Public/Public Partnership with the MOD on a brownfield site, that the Officers’ Mess might be brought forward earlier and that there would be an MOU and master planning. It also highlighted there would be stakeholder engagement in September 2017.

There are many examples where the County Council wears a number of hats when developing sites in which we have an interest. For example, we have statutory duties as the Local Planning Authority, Minerals Authority and Highways Authority. Our officers act professionally at all times to ensure we comply with these duties. The governance and decision-making around Planning Decisions is very clear and the MOU and underlying MOD partnership do not preclude the Council from considering and determining a planning application based on planning merit. This will include the relevant conditions and limitations on development.

It remains open to the Parish Council to lobby their local ward members and seek support of Councillors. Parish Councils will also be in a position to object to the application as statutory consultees.

	<p>The application will be considered by professional planning officers who are required to assess it based on material planning grounds. Equally, the planning committee will ultimately determine the planning application, applying material planning reasons for their decision.</p> <p>The decision-making will be determined by balancing various competing planning matters and with full knowledge that, if the decision is unreasonable or not based on material planning reasons, there is the possibility of challenge by way of appeal or Judicial Review.</p>
<p><b>ISSUE 2 - GARDEN VILLAGE PROPOSAL (SCOPE/SCALE)</b></p> <p><b>Issue:</b> With both Edith Weston and North Luffenham villages each containing around 300-400 houses (in common with most other for Rutland villages), there would have been little concern about a proposed “garden village” being of a similar size. However, what is being proposed is to place a new town the size of Uppingham in an area, which has hitherto been predominantly rural in nature. It is hardly surprising therefore that there is considerable concern about what is being proposed. Furthermore, all of Rutland’s perceived housing needs have been met within the current local plan without any requirement for building on the St George’s site.</p> <p>A development of 1500 plus houses would adversely impact upon the rural character of the local area which is cherished by all who live in the area. A town the size of Uppingham between Edith Weston and North Luffenham would radically alter the character of the local area, place an unacceptable strain on local infrastructure and subject the villages to a protracted period of disruption and soiling. There is therefore strong support in the local area for a development of no more than 500 houses, with accompanying support facilities.</p>	<p><b>Response:</b> Many of the issues raised here accord very strongly with our initial aspirations for the St George’s site. At September’s Stakeholder Launch, the five subsequent public meetings and the January Focus Group Sessions we have made clear that there is a shared commitment to:</p> <ul style="list-style-type: none"> <li>• Put infrastructure in place to support new and existing communities in advance of the development on an ‘Infrastructure First’ concept. We have recently been advised that we have been successful at Stage 1 of the Housing Infrastructure Fund (HIF) bidding process – we will be developing the business case for this during 2018</li> <li>• Infrastructure will include (not exhaustive) – Highways Improvements, School Places, Health Facilities, Recreation Facilities, Green Space, Public Transport, Village Greens, Superfast Broadband</li> <li>• Affordable Housing is a key priority for the site including mixed tenure, starter homes and custom build opportunities</li> <li>• Treat sensitively the Heritage of the site and this will feature within the draft masterplan and the tourism potential this presents.</li> </ul>

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Furthermore, any development should be phased so as to allow absorption of each phase before starting on the next.

As to the form of the new “village”, we would wish to see sufficient local (preferably high- technology) employment and provision to meet the increased demands on local shopping, healthcare facilities, schooling, recreation and open pedestrian circulation areas. We would also wish to see clearly identifiable “buffer zones” between the new development and existing villages, and would ask that the main site be developed in such a way as to enhance local tourism and heritage preservation, rather than just seeking high numbers of houses in the interests of maximising income from the site. Any new development should also include genuinely affordable Homes for local people.

The Local Plan process will test the evidential base for the number of dwellings proposed and the supporting infrastructure. As part of this process, anyone with alternative views will have a chance to voice them through consultation and before the Planning Inspector.

Issues relating to rural character and impact on local amenities will also be assessed as part of the Masterplan and Local Plan making process. Again, local people will have an opportunity to feed into this process, while this area will also be subject to examination by a Planning Inspector through the Local Plan process.

The Masterplan process has sought to engage local community in the very early stages and further community engagement is to take place as the Masterplan evolves.

Further engagement on the Draft Master Plan will take place throughout May 2018 with workshops, public exhibitions and opportunities in each of the five surrounding villages.

The Parish Councils support for a mixed-use development is welcomed and reflects the input we have received from focus groups and other contributions from interested parties.

Any development will indeed be phased over an anticipated 10-year period, possibly longer when the issues surrounding mineral extraction are taken into account.

We believe the site of 300 hectares is big enough to accommodate all of this and the masterplan will seek to demonstrate this.

We have listened closely and taken on board all the feedback we have received regarding buffer zones. We have been clear from the

	<p>outset that any new community will be separate and distinct from Edith Weston and North Luffenham and that green space or ‘buffer zones’ would play an important role in helping to achieve this. These will also be a key feature of the Masterplan.</p>
<p><b>ISSUE 3 - GOVERNANCE</b></p> <p><b>Issue:</b> The Governance of this project is deeply flawed with a failure by the Local Authority to recognise the impact of recent legislation and the views and opinions of villagers impacted upon by the proposed scheme.</p> <p>With respect to the proposed St Georges ‘Garden Village’ Project, there are two aspects, which urgently need to be addressed regarding governance. The first stage of governance concerns the test of whether or not the project qualifies to be governed at all. Secondly, if the project passes the criteria needed for the first test, then the question needs to be addressed is “whether or not Rutland County Council is capable of, or resourced to effectively handle a project of this size”. This submission focusses on whether or not the St Georges Village has met the criteria of the first stage. It concludes that it has not, for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The background of recent White Papers and government legislation is important. The Localism Act of 2011 which introduced Neighbourhood Planning, was an important part of the Government Manifesto to let local people have more say on local planning. This gave rise to the Neighbourhood</li> </ol>	<p><b>Response:</b> The Council has sound governance in place in accordance with our project management framework, including a Project Board with Cabinet Members and a local Ward Member.</p> <p>The project board manages and oversees progress on St George’s with respect to key milestones. When key decisions are required they are made by the appropriate decision making body. This is in accordance with the Council’s Constitution and relevant legislation.</p> <p>When decisions are required by our ‘Governance’ they are made by the appropriate body. Reports are advertised well in advance on our Forward Plan, in line with legislation, and are discussed in meetings which the public are invited to attend.</p> <p>E.g. the decision to proceed with the proposed acquisition of the Officers’ Mess at Cabinet on 20<sup>th</sup> March 2018 (Report 54/2018) and the inception of the project under the Rutland One Public Estate programme at Cabinet on 18<sup>th</sup> April 2017 (Report 77/2017). Papers for all these meetings are freely available on our website: <a href="http://www.rutland.gov.uk/meetings">www.rutland.gov.uk/meetings</a></p> <p>The Council has well-resourced planning, highways, education and social care services, all staffed by qualified and experienced professionals. In areas where it is felt additional resource is required to meet the demands of the project these have been commissioned by the Council where appropriate and necessary. The project has</p>

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Planning Act of 2017 which emphasised that Councils have a duty to respond to adopted post-hyphen examination Neighbourhood Plans. A Neighbourhood Plan which has been made, becomes part of the Local Authority’s Statutory Development Plan.

2. The March 2016 Government Paper entitled ‘Locally Led Garden Villages, Towns and Cities’ makes clear that a Garden Village must be a new discrete settlement and not an extension of an existing town or village. It also makes clear that a New Garden Village must have local support and a strong local commitment to delivery. Also it must be based on an evidenced-based local need for the extra development. The Neighbourhood Planning Act 2017 confirmed the government message that neighbourhood planning is here to stay and that Local Planning Authorities must support it.
3. The Government White Paper of 7 February 2017 ‘fixing our broken housing market’ emphasises that local communities should have control over where development goes and what it looks like. The National Planning Framework Consultation Papers March 2018 allows for policies to restrict development where adverse effects of granting permission would significantly and demonstrably outweigh the benefits. The earlier Policy Exchange paper 2015 ‘Garden Villages’ by Lord Matthew Taylor can be summarised as saying that Garden Villages should be a locally-led vision to meet local needs empowering local people to generate fantastic new communities that local people want.

also been recognised and supported by the Government’s One Public Estate Programme, which has allocated resources to explore the development potential of St George’s.

The first meeting regarding the closure of St George’s Barracks took place with Parish Council representatives in December 2016 (the meeting primarily discussed the kenneling for 1 Military Working Dogs but provided an opportunity to talk about the announcement). The Council has sought to engage local communities at the earliest possible stage of the project (prior even to master planning). We believe this was the right time to engage and will continue to engage widely throughout the planning process and as the project evolves.

It is recognized that the Edith Weston Neighbourhood Plan is part of the development plan system. However, the Neighbourhood Plan specifically excludes the St Georges site from its plan area – therefore the policies within Edith Weston Neighbourhood Plan do not relate to the St George’s site or the Officers’ Mess. Also, the Edith Weston Neighbourhood Plan covers the period 2016-26. The Council believes that any development proposals relating to St George’s are best considered within the new Local Plan for Rutland, given the strategic significance of the project. The new Local Plan will cover the period up to 2036. An additional stage of consultation is proposed in order that the implications of any development proposals for St George’s can be assessed and incorporated into the new Local Plan.

The High Level Masterplan will be based on the concept of developing a discrete, sustainable new community and not an extension to an existing town or village. In line with all settlements it would have links to neighbouring communities. This is supported by the request for buffers and public access which will be accommodated within the masterplan.

4. Taking all the above into account, it is clear that the decision by Rutland County Council to form an alliance with the MoD (Memorandum of Understanding) which has led to a decision to press on with a St Georges Garden Village, fails the test of being a project acceptable to the communities of Edith Weston and Rutland as a whole in that it:

- does not accord with the current Local Plan Core Strategy CS6 (uses of redundant military bases) particularly CS6 a, b and c.
- was not locally led
- is not based on evidences local needs (there are in fact no local needs for a development of this size)
- fails the criteria required for the establishment of a garden village of adequate separation from the existing local communities
- was produced without due consultation with local communities
- does not accord with the Edith Weston Neighbourhood Plan (part of the Local Plan). At no stage was the Neighbourhood Plan for Edith Weston mentioned in council presentations and indeed the Edith Weston Neighbourhood Plan Committee has never (to date) been contacted by Rutland County Council
- has been stated that the driving force by the MoD is to maximise the return it gets by disposing of the St Georges Barracks site for housing and clearly to date has had no regard for the effects of this on the local communities. Nor has sufficient consideration been

Work undertaken to date is based purely on exploring the development potential of the site. Any development proposals for St George’s will need to take account of the National Planning Policy Framework and a new Local Plan is being prepared to guide development in the County up to 2036.

With regards to consultation, the Council has and will continue to work hard to ensure we engage as widely and comprehensively as possible around the future of St George’s.

In relation to timing, the MOD / RCC Partnership has engaged and consulted significantly earlier than would be the norm compared to similar projects i.e. in advance of Master Planning. Notice was given in July 2017 at the Parish Council Forum that we were working on an MOU for the site with the MOD. Then, at the earliest opportunity, once agreement between the parties was in place to support the fact that a project existed, a significant programme of Stakeholder Engagement began.

In relation to focus Group sessions which took place at the Officers’ Mess, we must refute this criticism. Sessions were held at this location specifically for the convenience of local residents and more than 150 people attended. We did not receive any complaints about the event and anyone who wanted to attend was enabled to do so. Indeed, we worked hard to accommodate people at the last minute and no-one was turned away. The security arrangements were not prohibitive and simply required pre-registration and for attendees to bring a form of ID.

Anyone wishing to submit comments was able to do so through our website and a dedicated project email address. We have responded promptly to all queries and accept anonymous feedback.

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<p>given to alternative uses more aligned with Rutland’s existing Local Plan Core Strategies.</p> <p>5. Quoting from the Rutland County Council Local Code of Governance, the St George’s village proposal fails on the following Core Principles:</p> <ul style="list-style-type: none"><li>• there has not been good public engagement/ consultation*</li><li>• the governance body (the Council) has not ensured that they are doing the right things in the right way for the right people in a timely, open, honest and accountable manner</li><li>• to date has failed the requirement of taking informed and, in particular, transparent decisions</li><li>• has not shown sufficient engagement with local people</li><li>• finally has not presented properly evaluated and costed alternatives for the St Georges Barracks site.</li></ul> <p>As a result, we conclude that the Rutland County Council has not complied with the principles of Good Governance as set out in the Solace/CIPEA Good Governance Framework.</p> <p>Furthermore, we believe that Key Executive decisions resulting in the Council incurring expenditure have been taken/are about to be taken, which are significant in terms of their effects on communities living or working in an area affecting more than 2 wards in Rutland. Wards affected are for example not only Edith Weston/ North Luffenham but also Manton and Uppingham wards etc.</p> <p>6. We therefore ask that the St Georges Garden Village Project be subject to ‘call-in’ by councillors - the process by which</p>	<p>The aim of the focus group sessions was to give attendees the opportunity to come and share their views with open minds and without any preconceptions. The sessions were supported by the previous comprehensive briefings and information available freely on our website.</p> <p>The call-in process relates to decisions made. For all decisions made in relation to the project so far the opportunity for a call in has passed.</p>
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key decisions can be postponed from being implemented by Scrutiny Panel Members until Cabinet and the Council have reconsidered the matter and responded to the concerns expressed in this document.

7. In summary, there is a powerful case, we believe, for the St Georges Garden Village Project to be cancelled, and Rutland’s future housing requirements accommodated by a multiplicity of smaller development sites, well located and sensitively designed. Indeed, latest government proposals are for a minimum of 10% of housing allocation to be on sites of less than 0.5 hectares.
8. **Consultation.** We remain concerned at the lack of consultation in this project on the following grounds:
  - no public involvement or discussion prior to 31 October 2017
  - the discussion groups at the Officers’ Mess on 29 Jan 2018 were not fully representative in that attendance was rendered difficult due to the security arrangements at the Officers’ Mess
  - even more importantly, the discussion groups were not privy to the MoU since this was only released after the end of the discussion sessions
  - therefore no reliance can be given to any conclusions that have been drawn from these restricted and ill-informed sessions.

#### ISSUE 4 - LOCAL PLAN AND DRAFT LOCAL PLAN

**Issue:** Within the current local plan 2011 and the draft local plan (Jul 2017) the requirement for building of new homes within the County is considered at length using local, regional and national planning requirements. No suggestion is made in the draft local plan that further sites are needed and the requirement for new homes (Para 5.21 of the Draft Local Plan - 1,503 homes) up to 2036 is met in full. Therefore the additional homes proposed for St George’s Barracks are not required to meet the local or regional need.

At no point in the development of their proposals for the development of St George’s Barracks have RCC indicated why the proposed development of 1,500 to 3,000 homes is needed over and above the requirement identified within the local plan. The draft local plan identifies a number of sustainable development principles (RLP2) – many of these are not met by the proposed development, in particular:

- Meet most development needs within or adjacent to existing communities having regard to the defined settlement hierarchy
- Locate development where it minimises the need to travel and wherever possible where services and facilities can be accessed safely on foot, by bicycle or public transport
- Respect and wherever possible enhance the character of the towns, villages and landscape

RLP3 – The Spatial Strategy for Development, identifies where building should be permitted:

**Response:** The assessed housing need sets out a minimum requirement for the Local Plan to deliver. Beyond this, Councils are encouraged to provide for additional growth in appropriate locations to support national objectives for housing delivery. Councils are also encouraged to work with their neighboring authorities to ensure that wider sub-regional housing objectives are met through the duty to co-operate. This forms part of the Local Plan making process and is ongoing work.

Paragraph 46 of the recent Government consultation on putting the right homes in the right places sets out:

“Plan makers may put forward proposals that lead to a local housing need above that given by our proposed approach. This could be as a result of a strategic infrastructure project, or through increased employment (and hence housing) ambition as a result of a Local Economic Partnership investment strategy, a bespoke housing deal with Government or through delivering the modern Industrial Strategy. We want to make sure that we give proper support to those ambitious authorities who want to deliver more homes. To facilitate this we propose to amend planning guidance so that where a plan is based on an assessment of local housing need in excess of that which the standard method would provide, Planning Inspectors are advised to work on the assumption that the approach adopted is sound unless there are compelling reasons to indicate otherwise. We will also look to use the Housing Infrastructure Fund to support local planning authorities to step up their plans for growth, releasing more land for housing and getting homes built at pace and scale.”

Evidence for the proposed capacity of the St George’s site will form part of the masterplan and will cover:

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70% of the County’s residential development needs will be accommodated within and on the edge of the Main Towns (Oakham, Uppingham) The remaining 30% of the County’s residential development needs will be accommodated through allocated sites; redevelopment and; infill opportunities within the Local Service Centres.

Clearly, the proposed huge development in St George’s Barracks, which is contrary to many of the County’s strategic aims for the development of the County and therefore does not fit the Council’s local plan cannot be considered to be “Right for Rutland”.

- Housing land supply in a sub-regional context
- Market indicators for housing demand and supply
- Affordable housing delivery
- Optimum site capacity to deliver a “sustainable” development

These matters will be considered as part of the Local Plan process and evidence which will form part of the submission to the Planning Inspector before they determine whether the plan is sound.

The Draft Local Plan was prepared before any significant work had been undertaken to determine the preferred strategy for the St George’s site. As a result, the Plan did not take the site into consideration. As the situation has progressed and we have greater clarity as to the issues surrounding St George’s it is clear that the next iteration of the Local Plan must take the site into account. Additional work is now being undertaken to plan appropriately for the inclusion of the site within the new Local Plan. This means that the vision, objectives and spatial strategy for the Plan now need to be reviewed and amended. Consideration will also be given to how the Plan addresses housing, employment and social development needs arising from the County as a whole.

The Consultative Draft Local Plan was approved for the purposes of public consultation to help the preparation of the Local Plan. It is not a statement of Council policy – that will be determined in the next version of the Local Plan, prepared under Regulation 19 of the Local Plan Regulations.

The requirement to review local plans on a regularly basis is enshrined in legislation to allow for changes in circumstances such as St George’s and so that changes can be considered and planned for.

	<p>In relation to St Georges, this is the optimum time for the Council to be preparing its new Local Plan.</p>
<p><b>Issue 5: The CEO of RCC has taken no legal advice on applicability of Crichel Down Rules to St Georges Barracks.</b></p> <p><b>Issue:</b> Land obtained by public bodies via Compulsory Purchase is subject to specific rules when the land is scheduled for disposal (the Crichel Down rules). These apply the principle that unless the parcel of land has been materially changed, it should initially be offered back to the original land owner or their heirs at the current commercial price.</p> <p>The MoD has decided that the entire site has been materially changed, and that the Crichel Down rules do not apply. This decision may be subject to legal challenge, as the airfield is made up of 14 different parcels of compulsorily purchased land, and there may be individual parcels that would be judged to have not materially changed (each parcel has to be judged on its own merits, a change in one parcel of land does not determine the applicability of the Crichel Down rules to the other parcels)</p> <p>The CEO of RCC has taken no legal advice on Crichel Down rules for St Georges Barracks and so there is no current independent view of the MoD decision</p>	<p><b>Response:</b> The MOD as landowner is required to consider if the Crichel Down Rules are applicable when disposing of St George’s. The Defence Infrastructure Organisation (DIO) have taken legal advice and concluded that it is appropriate to follow the rules in this instance and that an exception can be applied (Rule 10 - material change of the whole). Former owners are duly notified of this decision and they have an opportunity to respond to MOD within two months. This process is underway and DIO will respond directly to any communication received from former owners or their eligible successors.</p> <p>It is worth noting that Crichel Down rules allow the MOD to seek planning consent for the subject land before it is sold, whether to a former owner or on the open market (if no exceptions were applicable).</p> <p>In this instance, land would be offered at the current market value at the time of sale. For example, after planning consent has been achieved and land carries an enhanced market value for residential use.</p> <p>The Council has also taken advice in relation to Crichel Downs and how it might impact on the project. For the above reasons the risk is assessed as low.</p> <p>If land owners have queried their position they have been connected to a named MOD contact. It is for those querying the position to take advice and/ or seek legal opinion.</p>

**ISSUE 6 - REUSE OF REDUNDANT MILITARY BASES AND CATEGORIZATION AS BROWNFIELD DEVELOPMENT**

**Issue:** RCC do not appear to follow their own Policy Guidance in respect of the development of Redundant Military Bases .

Within the draft Rutland Local Plan, RLP8 – Re-Use of redundant military bases, takes account of the potential development of St George’s Barracks. It states that the key requirements for any proposed development on MoD land including St George’s Barracks should:

- re-use existing land and buildings and where appropriate **minimise any built development on undeveloped land within the curtilage;**
- be subject to a transport assessment in order to minimise disturbance to nearby local communities through traffic, noise, other activities or uses;
- protect and where possible enhance the countryside and character of the landscape, natural and cultural heritage;
- be accessed satisfactorily and not generate unacceptable traffic on the surrounding road network;
- be accessible by public transport and include measures to encourage walking and cycling;

The proposed development appears not to follow this policy requirement in that significant development is planned within the area of land (the ‘airside’ element of the site) that is currently

**Response:** Land does not have to have development on it in order to be classed as brownfield. The whole of the St George’s site was previously subject to development, even if parts of the site appear as green space. As runways cross much of the site it is likely that the site has been subject to significant disturbance and “development”.

National Planning Policy Framework (NPPF) definition includes land within the curtilage as previously developed land. Therefore, all land within the curtilage of the barracks must be considered brownfield.

The matters covered by the policy criteria will be among the considerations included in the masterplan process. They will also form part of the planning considerations involved in incorporating the site within the Local Plan and through consideration of any planning application.

Once again, it should be noted that a new Local Plan is being prepared. As stated above, any reference to the Draft Local Plan needs to take into account that this is not currently a statement of the Council’s approved planning policies.

<p>undeveloped. It is essential that the other elements of the policy are fully enacted when planning the development.</p> <p>The designation of a site as being ‘Brownfield’ is important because it enables the Local Authority to authorize development through revised and simplified planning regulations. Whilst large elements of the site are clearly brownfield, the majority of the site is largely undeveloped and therefore it is questionable if it should be considered by RCC to be ‘unprotected’.</p>	
<p><b>ISSUE 7 - INFRASTRUCTURE</b></p> <p><b>Issue:</b> Infrastructure development needs to be completed in advance of build start and is fundamental to the successful development of the site. During the build phase, we must avoid clogging up local roads with heavy builders’ traffic. The success of this project will be entirely dependent upon ensuring that infrastructure provision is of the highest order. Access to the new site should be predominantly from the East via a new link from the A606, possibly using the road linking Empingham to Warren Farm as a basis. The main site access for construction traffic should be via this route. There will also need to be major improvements to the A606 junction with the A1, which is already clogging in peak periods. Improvements will be needed to the access to A47 via Wireless Hill, which will be impacted upon by the ever-increasing level of freight rail traffic on the North Luffenham rail crossing. Parking in Oakham, Stamford and around Rutland Water will also need to be enhanced.</p>	<p><b>Response:</b> We absolutely agree about the importance of appropriate and timely delivery of infrastructure and have made our commitment to this, and that of the MOD, very clear right from the start of the project. Infrastructure is specifically referenced within our MOU, underpins the master planning and is the reason we have submitted an application for national Housing Infrastructure Funding (HIF).</p> <p>Issues relating to infrastructure will form part of:</p> <ul style="list-style-type: none"> <li>• The Masterplan</li> <li>• Submissions before the Planning Inspector as part of the Local Plan process to demonstrate it is deliverable</li> <li>• Part of the consultation with statutory consultees as part of the planning process</li> </ul> <p>This will include comments from highways, education, drainage and water etc.</p> <p>At each stage of this process local people and Parish Councils will be in a position to put forward their views and this will form part of the decision and plan-making process.</p>

<p>If the size of the development exceeds 500 houses there will be a need for a new primary school and there will be a knock-on impact on local secondary schooling. See also the paras above on the Garden Village regarding other domestic infrastructure requirements.</p> <p>Energy efficiency and local generation – currently there is no mention of possible local energy generation/efficiency measures. Offset density by energy efficient property offering?</p>	<p>As previously alluded to, the Council has successfully navigated the first stage in two-stage bidding process for the Housing Infrastructure Fund (HIF) which will allow the early upgrading of all infrastructure prior to the delivery of any residential units.</p> <p>This will include such things as schools and highways, as mentioned among your issues. Indeed, the current plan assumes that these will be required early in the process and prior to the commencement of the residential units. Work has already commenced on determining the extent of the required highways upgrades.</p> <p>As part of the overall development we will also be working with organisations such as Highways England to ensure that any upgrades required to the national highways infrastructure are included within the overall package.</p> <p>As part of their overall proposals it will be a requirement of any developer to identify any efficiency measures that will be included within the design. At the present moment we are at the Master planning Stage – too early to go into this level of detail.</p>
<p><b>ISSUE 8 – HOUSING DENSITY</b></p> <p><b>Issue:</b> The outline proposals presented by RCC propose a housing density of 20 houses / hectare but also suggest that the new development should be similar to a typical Rutland Village. Housing density in most Rutland villages is far less than that proposed by RCC.</p> <p>Whilst it is understood that under Government guidelines housing density in modern housing estate development can be as much as 40 houses/hectare the proposals for St George’s Barracks suggest a housing density of 20 houses/hectare. However, this</p>	<p><b>Response:</b> This will be addressed as part of:</p> <ul style="list-style-type: none"> <li>• The Masterplan process</li> <li>• Local Plan process</li> <li>• Any decision made by the Planning Committee following representation from statutory consultees.</li> </ul> <p>Again, local people and Parish Councils will be in a position to put forward their views at each stage and this will form part of the decision and plan-making process.</p>

<p>does not reflect the reality of housing density in the adjacent villages. A simple desktop survey suggests that Edith Weston has currently a density of 8 houses / hectare. North Luffenham, where some 50% of the population is housed in 3 modern (post 70’s) housing estates, has a housing density of 13.2 houses / hectare. Whilst the RCC proposals may on first glance suggest an open and airy feel similar to that of a typical Rutland Village, the reality will be significantly different.</p>	
<p><b>ISSUE 9 - OFFICERS’ MESS SITE DEVELOPMENT – A LOST OPPORTUNITY</b></p> <p><b>Issue:</b> RCC propose to bring forward the Officers’ Mess site as a ‘Quick Win’, buying the site from the MoD and preparing to build circa 70 homes on it. This will deny the County the opportunity to build a new and much needed hotel and leisure complex on this prime site adjacent to Rutland Water, and close to major tourist attractions on the South Shore.</p> <p>With the heavy reliance on attracting tourism to the County the use of the Officers’ Mess site as a large housing estate is seen as a lost opportunity for a world class tourist development in an exceptional location. The site is ideally located and would provide essential revenue to the County. This is a one-off opportunity, which could be of national significance. RCC’s proposals to identify a site within the main barracks area for this type of development appear to be sub-optimal and make little sense.</p>	<p><b>Response:</b> We believe that the best use for this site is for housing. Alternative uses have been considered and this has been accepted as the preferred option. However, this will be subject to further work, as outlined in Cabinet report 54/2018.</p> <p>The provision of leisure facilities has been suggested and will be incorporated into the Masterplan as part of the main St George’s site. The same ‘one off’ opportunity exists on the main site, which is more suitable and less constrained in terms of space.</p> <p>There are a number of issues to be considered here:</p> <ul style="list-style-type: none"> <li>• The financial viability. While the Officers’ Mess may be seen as an ideal location there is a question of demand and we are unclear as to what the statement ‘much-needed hotel and leisure complex’ is based on. If genuine demand existed within the market then it is likely the private sector would have identified and met this already.</li> <li>• To work, such a facility would need to be a significant structure of potentially three storeys or more. In addition, there would be a requirement for significant parking which would put pressure on available space.</li> <li>• If this was built in advance of the main St George’s site it would</li> </ul>

	<p>need to be a destination in its own right.</p> <ul style="list-style-type: none"> <li>• The MOD are under remit to maximise housing numbers and capital receipts. This option would not achieve that.</li> </ul>
<p><b>ISSUE 10 - ENVIRONMENTAL ISSUES</b></p> <p><b>Issue:</b> The development of a new town of 1,500 to 3,000 homes coupled with the mineral extraction proposals will have direct and indirect impacts on the local environment. Assurance is required that these potential impacts will be properly assessed and any negative impacts are offset with appropriate mitigation and compensation.</p> <p><b>Landscape</b> – Rutland Villages are generally located in the bottom of valleys or on slopes leading down to them reflecting the presence of freshwater springs as a water supply. If expanded beyond the confines of the current camp on to the site of the former airfield (and hence on to some of the highest land in eastern Rutland), the new development would become highly visually intrusive across a wide area. The same concern applies to the quarrying proposals; the existing Ketton quarry is well screened from the west by the lie of the land and various woods, shelter belts and hedges.</p> <p>Unless the new quarry is carefully designed with clear and carefully considered restrictions on its extent it will create a major blot on the landscape of eastern Rutland.</p>	<p><b>Response:</b> We are acutely aware of how important it is to protect and preserve the environment as part of any redevelopment of St George’s Barracks.</p> <p>Environmental issues are dealt with by way of consultation with statutory consultees and their responses will form part of the decision and plan-making process.</p> <p>Any issues relating to the landscape or local wildlife will form part of that process and, where appropriate, expert reports will be sought in addition to full consideration of all relevant guidance. National and local environmental organisations are already involved in the master planning process by way of stakeholder meetings and workshops and will continue to be involved.</p> <p>The site will also be subject to an Environmental Impact Assessment, in accordance with relevant legislation.</p>

<p><b>Wildlife</b> – At a local level the old airfield is of significant importance for wildlife. It contains what may well be the largest area of calcareous/limestone grassland in Rutland or Leicestershire (a habitat of national importance). It also supports the largest population of the Marbled White butterfly in Leicestershire and Rutland. This conservation interest could be lost as a result of the quarrying proposals and expansion of the new settlement on to the airfield. There is a need for detailed surveys to ascertain the extent of the conservation interest. In addition the current Government has recently published its 25 Year Environment Plan (<a href="https://www.gov.uk/government/publications/25-year-environment-plan">https://www.gov.uk/government/publications/25-year-environment-plan</a>), this sets out a policy of ‘net gain’ for the environment associated with new development. Confirmation is sought that this approach be reflected in the proposals being developed by the St. Georges Partnership. There is an additional risk that the development of a new town (as opposed to a ‘<i>Right for Rutland</i>’ sized village) could cause excessive recreational disturbance to the conservation interest of Rutland Water, arguably the County’s most important environmental asset.</p>	
<p><b>ISSUE 11 – ACCESS TO THE COUNTRYSIDE</b></p> <p><b>Issue:</b> The creation of RAF North Luffenham in 1939 led to the loss of minor roads, bridleways and footpaths, limiting countryside access for local residents ever since. The development of a new town of 1,500 to 3,000 homes will create an increased demand for local recreational access opportunities and it is essential that this is designed in to the development proposals and linked to the</p>	<p><b>Response:</b> This is an opportunity to bring back and enhance access through and across the St George’s site.</p> <p>Where currently we have a largely confined and restricted military facility, we are proposing an open mixed-use development with the potential to re-use and restore minor roads, footpaths and bridleways as part of the design and masterplan.</p>

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aspirations of existing local residents to have better access to their local countryside.

The development of RAF North Luffenham in 1939 led to the closure and loss of several minor roads, bridleways and footpaths. As a consequence there is already a deficit in opportunities for the residents of Edith Weston, North Luffenham, Ketton and Normanton to access the surrounding countryside due to the truncation and loss of public rights of way (PROW) where they meet MOD land holding. The paucity of such opportunities and the desire for better countryside access was the single most important environmental issue identified by the residents of North Luffenham in a village wide survey in 2017. The residents of any new town or village in rural Rutland will need and expect to be able to access the surrounding countryside and should be able to do so easily from where they live (without the need to travel by car). It is essential that any development proposals provide adequate accessible green space both within and adjacent to the new settlement; these should meet or ideally improve on the latest standards for *‘Accessible Natural Green Space in Towns and Cities’*. There will also be a need to provide access to the surrounding countryside through new or re-established PROW. Failure to do so would put unacceptable pressure on the footpath network in the surrounding villages and deprive the residents of both the existing villages and the new settlement of recreational opportunities. The presence of the old airfield adjacent to the new development with its historically important Thor Missile Sites provides an opportunity to create a new country park and nature reserve. This space if well designed

A Design and Access Statement will be required to support any planning application and this will need to show how the proposed development would enhance connectivity to and for the wider community.

<p>and managed would not only provide important green space for both the existing and new communities but would ensure proper conservation of the cold war historic interest and local wildlife. It also has the potential to become a tourist attraction in its own right.</p>	
<p><b>ISSUE 12 – MINERALS EXTRACTION</b></p> <p><b>Issue:</b> The development of a major new quarry / quarry extension will have major impacts on the surrounding communities, the local landscape, local wildlife and on the new town development. The scale, and hence financial return, from the quarrying proposals needs to be balanced against the need to minimise its visual intrusiveness, its impact on nationally important wildlife habitats and the impacts on local communities. Assurance is required that these potential impacts will be properly assessed and any negative impacts are offset with appropriate mitigation and compensation.</p> <p>While quarrying has a long history in Rutland older quarries were relatively modest in scale. The existing Ketton quarry site is already very large and the creation of a new quarry immediately adjacent to that site would create a ‘super quarry’. This would have a whole range of impacts on the surrounding countryside, its landscape and local communities. It is essential that the proposals are carefully constrained so as to keep the quarry to the north of the highest land on the airfield so as to minimise its landscape impacts, provide adequate separation from existing and new communities and to ensure that the Thor Missile context</p>	<p><b>Response:</b> The mineral deposits in question are nationally significant and can only be worked in this location. As a result, the minerals area must be safeguarded in accordance with national policy and mineral extraction will take place in this area at some point, regardless of any potential redevelopment of the site. This is particularly the case once the site has been decommissioned by the MOD.</p> <p>Issues relating to wildlife and habitats arising from the extraction of minerals will be subject to consultation with relevant statutory consultees through the mineral planning process. Any approval for extraction will be subject to appropriate conditions as required by expert consultees before any mineral extraction takes place.</p> <p>The area of land that is safeguarded for minerals will eventually be made available again in future years, once extraction is complete. It may be 20 years before minerals extraction would need to begin and a further 10 years to complete the process. The master planning process will help to show how safeguarded areas might be utilised, both before and after extraction.</p>

<p>can be conserved within the context of its original military setting.</p> <p>It is also important that careful consideration is given to after use of the new quarry given that the existing airfield is of high nature conservation interest. Restoration of the area subject to mineral extraction as a nature reserve would also eventually provide additional green space for both the new and existing communities and provide an opportunity to re-establish public rights of way and link these to those at Rutland Water.</p> <p><b>Issue:</b> Mineral extraction may not be economically viable.</p> <p>The minerals on the airfields site may be difficult to extract economically. Previous British Geological survey identified that the area contains Lincolnshire limestone of the Jurassic age. This material is soft, porous, thin and inconsistent. It is capable of producing lower quality aggregates (sub base, fill material), building stone, lime or could be used in the production of cement. It may potentially be cheaper to import limestone from abroad for use as a Cement production feedstock.</p>	
<p><b>ISSUE 13 - BUFFER ZONES</b></p> <p><b>Issue:</b> The proposal to build a “Garden Village” on the site of St George’s Barracks will create a significant impact on the lives of the existing villagers of Edith Weston and North Luffenham. To ameliorate the impact of the proposed build and establishment of a major 100 Hectare quarry and the disruption that this will inevitably cause, it will be essential that effective buffer zones are created between the villages and the proposed new build.</p>	<p><b>Response:</b> We have listened closely and taken on board all of the feedback with have received regarding buffer zones and fully support this principle.</p> <p>We have been clear from the outset that any new community will be separate and distinct from Edith Weston and North Luffenham and that green space or buffer zones would play an important role in helping to achieve this.</p>

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To be eligible for Government Funding DCLG’s requirements are that “a Garden Village must be a new discrete settlement, and not an extension of an existing town or village”<sup>1</sup>. It is important therefore from both a funding and social perspective that clear buffer zones need to be imposed from the outset, and maintained thereafter to ensure the integrity of the existing villages and to reduce the impact that the new build will have on lifestyle and social cohesion. At present a clear buffer zone exists to the South of the Site (between the existing Barracks and Edith Weston Road and to the East (between the site and Ketton Road) and to the North (Ketton / Normanton Road). The boundary to the West is more problematical but has a significant impact on Edith Weston which must be considered in the planning phase. In the Memorandum of Understanding there is a disturbing statement (1.3 Table 3 R15) *“Land surrounding the site not in RCC or MOD ownership limits the ability of the partnership to develop the site as indicated by the master plan e.g. supporting infrastructure and access. The partnership agrees to explore further land acquisitions or involvement in the partnership of other landowners as and where appropriate to enhance project aims. The Housing Infrastructure Fund has been identified as a potential funding source for this element of the project.”* Early clarification of exactly what this means is needed and a firm commitment made by RCC that as the planning authority they will not allow building of homes or quarrying beyond the bounds of the existing airfield site.

We also agree that a buffer zone will be required to separate any mineral extraction site from the remainder of the St George’s development. This would form part of the Local Plan and any Minerals Planning Application. The Council is working with its minerals planning consultants at Northamptonshire County Council to determine the most appropriate buffer zone, which will then form part of a the detailed Masterplan.

The minerals survey and analysis have confirmed that extraction would be proposed.

The advice we have received to date indicates that the St George’s site would meet the criteria for Garden Village designation. This includes a site visit and follow up meeting by Lord Matthew Taylor and meetings with the Homes England (Formerly the Homes and Communities Agency) and the Department for Homes Communities and Local Government (formerly the DCLG).

The MOU reference (1.3 Table 3 R15) relates to putting in place effective and supporting infrastructure and to assist where appropriate buffers are suggested. If further acquisition of land would facilitate this then it would be considered. It should be noted that the land referred to is in private ownership.

**ISSUE 14 - SOCIAL DYNAMICS**

**Issue:** The potential social effects of up to 3,000 homes creating a dormitory town and its impact upon surrounding villages.

The RCC plan cannot replicate a Rutland village community, which will have grown and evolved over many hundreds of years. Whilst difficult to define a village, a degree of inter-dependence reflects its nature, with individuals both contributing to and taking from the tight community in which it lives. This ‘community spirit’ ensures that many individuals choose to live in villages rather than towns, despite the lack of resources – eg shops, entertainment etc. The success of a ‘new’ village will depend on the ability of the community to create this ethereal quality. Social cohesion and on site employment opportunities will be essential because without this what will be created will be a dormitory town with no heart.

The structure of the development over time with a community hub, a pub, a post office, village shops, a sports centre, an open space and enterprise units will change the social structure and cohesion within the surrounding villages, potentially generating a ‘them and us’ situation, which is not a desired outcome. Some investment will need to be made in the existing villages, utilising development funding (CIL) received from the proposed new town.

**Response:** Again, we have listened carefully to all of the feedback we have received from Parish Councils and local people regarding the importance of community cohesion.

We are committed to doing everything possible to support community cohesion around the redevelopment and to strike the right balance between separation and integration of new and existing communities.

The Council and the MOD have consistently stressed the importance of getting the right social, as well as physical infrastructure in place as part of any redevelopment of St George’s Barracks. We recognise the importance of the various community facilities referred to within the issues document. These have been identified as a priority in all of our communications and engagement to date and within the MOU.

The Masterplan will also refer to them and a workshop to coincide with the Masterplan launch will deal specifically with this issue. The Parish Councils will be invited to send a representative to support this work.

**ISSUE 15 - BUSINESS AND LEISURE**

**Issue:** To ensure social cohesion and sustainable development it will be essential that business and leisure opportunities are created from the outset of the project.

The acceptance of the proposed development by the communities of NL and EW and its integration within these village communities, will depend not only its size, but also in ensuring that it does not become a ‘dormitory town’ for commuters to London, Leicester, Peterborough etc. The opportunity for businesses to develop and provide on site local employment which might include hi technology employment (a Science Park), small scale manufacturing, home-working as well as shops, restaurants and leisure facilities will help community cohesion, development and sustainability as well as reducing the impact on the roads. There will need to be ample provision of green spaces for a variety of leisure activities, pathways and trails, as well as indoor recreation and places for the community to meet.

**Response:** We agree with these comments, which, once again, closely mirror our aspirations for the St George’s site. They also accord with the Memorandum of Understanding between the Council and MOD, while business and leisure will be key areas of focus within the Masterplan.