

# **Assessment of proposed Strategic Development Sites at St George's Barracks and RAF Woolfox**

**August 2019**





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# 1. Introduction

- 1.1 PTP Planning Services were appointed in April 2019 by the Local Planning Authority (LPA) for Rutland County Council (the Council) to undertake an independent assessment of the evidence and broad merits of a New Community / New Garden Village (hereinafter referred to as 'New Settlements') being promoted through the emerging Rutland Local Plan. The two sites were at St George's Barracks (Edith Weston) and the former RAF Woolfox (Clipsham / Stamford).
- 1.2 PTP Planning Services confirm that in preparing the report, the author has acted with objectivity, impartially and without interference, and with reference to all available sources of evidence.
- 1.3 The findings of the assessment will assist the Council in its decision making process, identifying further evidence and procedural requirements and ultimately informing the process that will lead to a choice of potential site allocation (if any) in its Local Plan.
- 1.4 The report offers an impartial assessment of the evidence submitted and whether the sites would potentially meet the tests of soundness if they were to be submitted to the Secretary of state and examined by an Independent Planning Inspector.
- 1.5 The report will seek to identify whether either, neither or both of the options would be 'justified' or 'effective' as a potential allocation. The report will also consider whether the evidence indicates that the proposed new settlements are consistent with Government Policy contained in the National Planning Policy Framework (NPPF) and in Planning Practice Guidance.
- 1.6 Paragraph 31 of the NPPF provides the context for evidence provided in relation to Local Plans and states:

*"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned....."*

- 1.7 The evidence underpinning each of the proposals is considered in relation to 41 key issues. The issues have been identified as those most likely to be considered by an Independent Inspector in the context of soundness as part of the Local plan examination process. In particular, the report addresses the evidence relating to:

- 'Strategic Matters'<sup>1</sup> referred to in paragraph 20 of the NPPF 2019;

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<sup>1</sup> Paragraph 20 of the NPPF 2019 defines these as: "a) housing (including affordable housing), employment, retail, leisure and other commercial development; b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); c) community facilities (such as health, education and cultural infrastructure); and d)

- Viability and deliverability, and;
- Potential environmental, social and economic impacts.

- 1.8 An assessment of the evidence submitted at the time of writing this report is made for both sites in an open, transparent and systematic manner. The assessments will be informed by the requirements of the National Planning Policy Framework and Planning Practice Guidance but will also be benchmarked against the evidence submitted to recent Local Plan examinations where the plan was subsequently found to be sound. This acts as an indicator of whether the evidence is proportionate and robust.
- 1.9 Based on the evidence available, the report will make recommendations as to whether neither, either or both of the sites would be ‘justified’, ‘effective’ and ‘consistent with National Policy’ as potentially suitable allocations for New Settlements in the emerging Local Plan. The report will identify where further evidence gathering may be required in order to remedy shortfalls.
- 1.10 It is not the purpose of the report to state a preference for either of the options, this is a matter for the Local Planning Authority as the decision making body. However, a brief summary of the relative merits of each site is contained in the conclusions.
- 1.11 The report makes a judgment as to whether the site options are ‘Reasonable Alternatives’ which need to be appraised consistently through a Sustainability Appraisal incorporating Strategic Environmental Assessment.
- 1.12 The report does not assess the Council’s decision making to date on the potential site options, and does not make a recommendation as to whether either, neither or both sites should be allocated in the emerging plan. This lay outside the scope of the commission and is a matter for the Local Planning Authority based on the evidence available and planning judgment.
- 1.13 The structure allows an assessment of any further Proposed New Settlement options or Strategic Scale sites that may emerge as part of the development of the Local Plan.
- 1.14 The report is structured as follows:
- Section 2 - Background
  - Section 3 - Overview of the sites to be assessed
  - Section 4 - Proposed methodology
  - Section 5 - Site assessment summaries
  - Section 6 - Recommendations and conclusions
  - Section 7 – Site option merits
  - Appendices – Detailed assessment of issues

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conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.”

## 2. Background

- 2.1 Rutland County Council is reviewing its Local Plan in order to provide a blueprint for development up to 2036. The Local Plan seeks to allocate land to meet the requirements for new development and associated infrastructure including new housing, employment and other development that is needed over the plan period.
- 2.2 The Council produced an 'Issues and Options' consultation document in November 2015 followed by a 'Consultation Draft Plan' in July 2017. Both documents were prepared as part of ongoing development of the plan in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.3 The Local Plan Consultation Version 2017 included:
- A Spatial Portrait
  - Vision and Objectives
  - Spatial Strategy & Location of Development
  - Potential Allocations
  - Policy Options, and
  - An implementation and Monitoring Framework
- 2.4 The Council subsequently produced a 'Specific Consultation considering the implications of potential development of St. George's within the Local Plan' in July 2018. The consultation document responded to the announcement by the Ministry of Defence (MoD) indicating that St. George's Barracks (St George's) would close in 2021.
- 2.5 The 2018 consultation primarily sought the views of interested parties, residents and other stakeholders regarding the future of the site. The document also sought views, amongst other things, in relation to proposed changes to the spatial strategy and settlement hierarchy. The document introduced 'New Settlements' as a potential option for growth.
- 2.6 In response to the July 2018 consultation, a substantial number of representations were received. At this time, a representation promoting a Strategic Scale 'Garden Community' was submitted by agents on behalf of the owners of the former RAF Woolfox site.
- 2.7 It is the Council's intention to produce a 'Publication' version of the Local Plan for consultation in the Winter 2019/20 in advance of submission to the Secretary of State. The Council will need to assess all reasonable site options through this process.



## 3 Overview of the sites to be assessed

3.1 The report will consider the two strategic sites that have been put forward by different promoters. A broad overview of each site is set out below:

### 3.2 Woolfox

3.2.1 A map showing the potential site is attached as Appendix A.

3.2.2 The site was promoted on behalf of the landowners via agents in September 2018 in response to the 'Specific consultation considering the implications of potential development of St George's within the Local Plan' August-September 2018. The site had not been suggested to the Council before this date.

3.2.3 The site comprises the area occupied by the former Woolfox Lodge airfield (southern part of site) and adjacent agricultural land and woodlands. The site lies to the east of and adjacent to the A1, some 14.5 km east of Oakham and 11 km north of Stamford. It is currently used primarily as arable farmland.

3.2.4 The total site area is some 486 Hectares (gross). An illustrative masterplan has been prepared by the site promoters.

3.2.5 The site promoters indicate that the development will comprise:

#### Phase 1:

- Up to 2,500 new homes;
- Employment floorspace – total site area is 27 hectares comprised of:
  - B1: 2 ha
  - B2: 2 ha
  - B8: 19 ha;
  - Trunk Road service area: 4ha;
- 2 x 2 Form Entry primary schools and a secondary school;
- A Local centre;
- Public Open Space - include formal play areas; and
- Two points of access off the A1 – one to link to employment area and a second to link to residential areas.

#### Phase 2:

- Up to 7,500 new homes;
- A Local centre uses;
- 1x 2FE Primary School; and

- Public Open Space- including urban farm and allotments, formal sports areas and play areas.

3.2.6 A detailed phasing trajectory has not been prepared for Woolfox at the time of drafting this report.

3.2.7 Details of the proposal can be accessed from a web-site developed by the site promoters (see <https://woolfoxgardenvillage.co.uk/>).

### 3.3 St George's

3.3.1 A map showing the potential site is attached as Appendix B.

3.3.2 The site was promoted on behalf of the Ministry of Defence (MOD) following the strategic review of military assets in 2016. The site was identified as a potential option in the 'Rutland Local Plan Specific Consultation considering the implications of potential development of St. George's within the Local Plan' Consultation (August to September 2018).

3.3.3 The site comprises the area occupied by the St George's Barracks adjacent to Edith Weston.

3.3.4 The total site area is some 300 Hectares (gross). A masterplan has been prepared by the site promoters. This indicates that the proposed development would comprise:

- The provision of 2,215 new homes;
- A new local centre;
- A new 3-form entry primary school;
- 14 hectares of new employment;
- Provision of a holistic sustainable transport including 'park and cycle ride';
- A new health and wellbeing centre;
- The creation of a 125 hectare country park; and
- The creation of a 29 hectare heritage and ecology zone.

3.3.5 Details of the proposal can be accessed from a web-site developed by the site promoters (see <https://www.stgeorgesrutland.co.uk/> ).

3.3.6 The St George's proposal has been developing over the three years since it was announced that the site will close. It is also the subject of a bid to the Housing Infrastructure Fund. As a result it is supported by a range of detailed evidence reports, detailed costing and phasing schedules more akin to that required for a planning application. In many cases this evidence is more detailed than that required for the assessment of a site through the Local Plan.

## 4 Proposed methodology

- 4.1 41 issues have been identified against which the evidence underpinning the respective sites are assessed. The issues are largely based on key strategic policy areas identified in the NPPF 2019 (Paragraph 20) and other issues that are frequently explored as part of the examination of the soundness of a Local Plan. The assessment process is structured to ensure that a common approach to identifying and reviewing the planning issues was applied to each of the New Settlement options.
- 4.2 The assessment of available evidence was mainly desk-based, although both sites were visited as part of the process and short and long distance views of the sites helped to understand the sites' contexts and to aid understanding of the submitted Landscape evidence.
- 4.3 Face to face meetings were held with the Local Education Authority, Local Highway Authority and East Leicestershire & Rutland Clinical Commissioning Group. Telephone discussions were held with Western Power and Anglian Water enable a greater understanding of the provision of utilities.
- 4.4 The evidence that has been assessed includes that produced by both site promoters (including their agents). Woolfox evidence is largely available on the 'Woolfoxgardenvillage' website set up by the site promoters in support of this option. Further evidence relating to viability was made available to assist the author in producing the report and was treated in confidence. Some evidence based studies for St George's were available on the 'StGeorgesRutland' website. Other evidence relating to the key issues was made available by the agents of the site promoter<sup>2</sup>.
- 4.5 Some evidence which was not 'site specific' to the two options was considered sufficiently proportionate and robust to allow a consideration of whether the options were 'justifiable' and 'effective'. Examples include the potential for fluvial flooding (addressed in the Strategic Flood Risk Assessment carried out for the LPA and Environment Agency flooding data) and Agricultural Land Classification data.
- 4.6 The report considers in each case whether further detailed studies are required or whether independent verification would assist in considering whether the sites are 'justified' and 'effective'.
- 4.7 The criteria against which the sites are assessed include:

### Capacity and Deliverability

1. Potential to deliver the outstanding requirement for development - Overall site capacity (Housing & employment) – including Start date & Trajectory
2. Viability
3. Ownership constraints and identified developer partner
4. Legal constraints

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<sup>2</sup> The availability of evidence is considered in the Conclusions and Recommendations section later.

## Environmental

5. Flooding
6. Landscape
7. Ecology (habitats and species)
8. National / European designations
9. Minerals
10. Trees and woodlands
11. Air quality, noise and other pollutants
12. Land stability and contamination
13. Topography
14. Heritage (Designated and non-designated heritage assets and their settings)
15. Best & Most Versatile Agricultural Land.
16. Re-use of Previously Developed land
17. Urban Design / Garden village principles

## Infrastructure<sup>3</sup>

18. Provision of Schools
19. Provision of Health Care (primary and acute needs)
20. Utilities (including water, power and telecommunications)
21. Retail facilities
22. Community facilities
23. Parks and Open Spaces
24. Strategic Green Infrastructure

## Transport

25. Impacts of development traffic
26. Availability of public transport
27. Access to cycling networks
28. Access to public footpath networks
29. Impact on public rights of way
30. Potential to incorporate new technologies
31. Major transport infrastructure constraints

## Economy

32. Employment Land provision
33. Construction and longer term economic benefits

## Policy and strategic principles

34. Consistency with National Policy
35. Larger scale development
36. Healthy lifestyles
37. Creating a strong economy
38. Boosting the supply of housing

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<sup>3</sup> The assessment will identify where development can access existing infrastructure and / or where there is potential to provide new infrastructure on site.

- 39. Provision of affordable housing
- 40. Maintaining Strategic gaps between settlements and protecting local character
- 41. Scale in comparison with host settlement

4.8 The assessments of each option are summarised in section 5 of this report and tabulated in Appendices 1 to 41. These provide a summary of the key issues in relation to submitted evidence for each site. The site assessment summaries, conclusions and recommendations will be set in the context of the tests of soundness<sup>4</sup>, i.e. whether the site options are:

- a) Positively prepared;
- b) Justified;
- c) Effective; and
- d) Consistent with national policy

The report contains an initial assessment of whether the sites are 'justified' and 'effective' as potential options to be included as an allocation in the Council's emerging Local Plan based on the available evidence. Where appropriate, the report also indicates where the proposed new settlements are consistent with national policy contained in the NPPF.

4.9 It has been assumed that each of the sites are broadly consistent with the locational strategy<sup>5</sup> contained in the emerging Local Plan in that they both promote new settlements broadly equivalent in distance from 'higher order' settlements (Stamford in the case of Woolfox and Oakham in the case of St George's). In this respect, both sites were considered to offer a Local Plan solution that sought to meet the identified requirements for new development and could therefore be considered 'positively prepared' in accordance with that test of soundness.

4.10 The report identifies where further evidence may be required in order to support each of the sites as potential allocations. This can be evidence gathered by the Local Planning Authority or evidence produced on behalf of the site promoters in support of their respective sites. It is important in all cases that evidence produced can be considered open, robust and independent. The report makes several recommendations concerning the commissioning of suitably qualified consultants to produce new evidence or independently scrutinise that submitted by the site promoters.

4.11 It is not the intention of the report to identify a 'preferred site', only to consider whether each of the sites would represent "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence" in accordance with the NPPF.

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<sup>4</sup> National planning Policy Framework 2019 Paragraph 35.

<sup>5</sup> Draft Policy RLP3 of the 'Rutland Local Plan Specific Consultation considering the implications of potential development of St. George's within the Local Plan' document (July 2018) refers specifically to St George's as providing an opportunity to reuse a major brownfield site to create a new sustainable settlement. This pre-dated promotion of Woolfox and it is therefore reasonable and appropriate to assess each of these consistently in the context of emerging strategic policy.

- 4.12 Assumptions have been made in relation to the assessment of evidence. Some of these are set out below:

## Assumptions

### Site Capacity assumptions

- 4.13 Both proposals identify potential housing capacity, based on assumptions put forward by the site promoters<sup>6</sup>. This has been based on the ratios used in the Rutland County Council Strategic Housing Land Availability Assessment which identifies 60% net developable area on sites over 4ha and net densities of 30 dwellings per hectare. This was cross referenced against net and gross residential density assumptions applied elsewhere as custom and practice and local policy used in the assessment of site capacity.

### Housing Mix assumptions

- 4.14 Notional housing mixes have been promoted by both promoters. The St George's proposal includes a detailed breakdown of housing type, mix and size which has been prepared to inform costs schedule and viability work which forms part of the HIF submission. It is likely that such mixes would evolve over time in response to identified need and market considerations. At this stage, the report assumes that a suitable mix can be provided for both sites in terms of market and affordable housing. A more detailed assessment of viability will determine the impact of the affordable housing requirement on viability and deliverability of each scheme.

### Transport impacts

- 4.15 Transport evidence has indicated that off-site measures are required to mitigate any adverse impacts. At this stage, it has been assumed that any off-site works are within the public highways or are capable of being implemented through the intervention of the Local Highway Authority or Highways England<sup>7</sup>. Fully costed off site access works have been identified for St George's. Indicative costs of a potential grade separated junction has been identified for Woolfox.

### Other Infrastructure

- 4.16 Meetings were held with the Local Education Authority and East Leicestershire & Rutland Clinical Commissioning Group. An assumption has been made that, in the absence of identified specific infrastructure providers for education<sup>8</sup> and health, that (at this stage) a partner could be identified.
- 4.17 Utilities Infrastructure providers were contacted for their views at this high-level assessment stage. Additional detailed searches for below ground infrastructure constraints were not undertaken. Following discussions with utilities providers, it has been assumed that technical

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<sup>6</sup> St George's promotes some 2,215 dwellings in total and Woolfox c.2,500 (phase 1) and 7,500 (phase 2)

<sup>7</sup> With the agreement of the Department for Transport (DfT where necessary).

<sup>8</sup> It is noted that the St George's Garden Communities and HIF submissions were supported by both the Edith Weston school (Brooke Hill Academy Trust) for the primary school and the ELRCCG.

solutions would be possible for both sites (however an assumption cannot be made about the cost implications of achieving these solutions and this will need to be explored further through detailed assessment and viability testing). A costed proposal for utilities has been prepared for St George's site, none was available for Woolfox at the time of drafting this report. The assessment of utilities evidence and the ability to understand the implications on site viability is not straightforward, particularly for Woolfox where costings are not currently available.

#### Planning History assumptions

- 4.18 Both sites have planning histories connected with their former and current uses. It has been assumed that neither of the sites planning histories directly relate to development associated with 'New settlements' and at this stage detailed scrutiny of planning history data was not considered necessary. It is noted that a planning application for a 'wind farm of nine three-bladed, horizontal axis wind turbines, each up to 130m maximum height proposal' was refused planning permission at the Woolfox site in December 2015, primarily on landscape and amenity grounds. This is not considered directly applicable to the consideration of the evidence base submitted in relation to the New Settlement.

#### Habitat Regulation Assessment and Sustainability Appraisal

- 4.19 The Habitat Regulation Assessment and Sustainability Appraisal / Strategic Environmental Assessment Regulations are separate regimes that will need to consider options. An assumption has been made that both sites will be assessed under these regulatory regimes.

## 5. Site assessment summary results

5.1 Appendices 1 to 41 assess each of the two site options against the criteria set out in section 4.8 above.

5.2 In summary, the assessments show:

### Capacity and Deliverability

5.3 Both sites have sufficient site capacity to deliver the identified development requirements for housing and employment over the plan period. The specific issue of 'Affordable Housing' is considered later in the report.

5.4 The evidence submitted by the Woolfox promoters indicates a total site area of 486 ha with potential for 2,500 dwellings in phase 1 and some 10,000 in total (a gross density of c.20 dph and net density of 34dph assuming 60% net to gross ratios). The evidence underpinning the St George's proposal identifies a site of some 289 ha some 2,215 in total with a net density of 25 dph in the proposed development area.

5.5 Evidence of potential start dates and a detailed achievable trajectory would help to give assurance to any Inspector that the chosen site is able to deliver. A draft trajectory has been prepared for St George's and shows a delivery rate of up to 225 houses per year during the peak of development. This is a challenging rate but examples of similar delivery rates in strong market areas can be found. A more detailed housing trajectory is required for Woolfox to give increased certainty that the quantum of development is achievable in the plan period. Based on the evidence contained in the 'Woolfox Sustainability Appraisal' and 'Viability Assessment' this could be remedied.

5.6 Notwithstanding the potentially lengthy lead in times, advance infrastructure requirements and site preparation works it is reasonable to assume that some 1,200 houses could be delivered during the plan period at either site. Both site promoters have indicated that they will provide a policy compliant level of affordable housing, this will require independent viability assessment.

5.7 The emerging Local Plan identifies a requirement for some 25ha of employment land between 2015 and 2036. Early consultation drafts already identify sites that would meet this requirement (without the employment elements in the New Settlement options). Notwithstanding this, the provision of employment land at the proposed site options would: help to meet the NPPF objective of 'Building a Strong, Competitive Economy'; provide flexibility in the provision of employment land, and; allow co-location of homes and jobs to encourage sustainable travel patterns and support the concept of a "garden village".

5.8 Both sites are unlikely to be able to deliver housing in the short term owing to the ongoing military operations at St George's and advance infrastructure requirements at Woolfox.

5.9 In summary, both sites would be 'justified' as potential allocations in the context of having sufficient capacity to accommodate the identified requirements for development. St George's



could be considered 'effective' in terms of the housing delivery trajectory. Further evidence is required in relation to a trajectory for Woolfox, this could be remedied and therefore it is potentially 'effective'.

## Viability

- 5.10 The National Planning Policy Framework and revised Planning Practice Guidance (May 2019) (PPG) places increased emphasis on viability evidence at the plan making stage. The PPG states:
- “Plan makers can undertake site specific viability assessment for sites that are critical to delivering the strategic priorities of the plan.”*
- 5.11 The Planning Practice Guidance is clear that LPAs should "engage with landowners, site promoters and developers" to "ensure assumptions of costs and values are realistic and broadly accurate".
- 5.12 The Woolfox proposal is accompanied by a confidential report 'Development Appraisal to summarise delivery and viability' that has been made available to the report's author. The report broadly refers to infrastructure requirements but does not reflect all potential policy requirements of the emerging plan or the costings for necessary site preparation and unknown costs for utilities provision. There is no detailed assessment of the viability implications associated with phasing (and potential front loading of infrastructure including a grade separated junction on the A1 (which it is understood will be required after 500 homes have been complete), utilities provision & diversion, and early delivery of schools). The report indicates potential developer profit at 13.95%. This is at the lower end of what is likely to be attractive to developer partners (normal custom and practice is 15 – 20% as reflected in the PPG). The report is identified as a 'living document' and will evolve and therefore the evidence required has the opportunity to be remedied, however, at this time it is not possible to conclusively state that the scheme would be viable.
- 5.13 A number of detailed cost and viability reports have been prepared for St George's in relation to a Housing Infrastructure Fund (HIF) bid. The HIF process includes a full examination of the business case and supporting evidence. This includes detailed analysis by MHCLG, Homes England and their specialist engaged consultants. HIF submissions are tested to ensure that proposals are viable and deliverable. Should the bid be successful this would give comfort to an appointed Inspector were St George's to be chosen as the preferred option. However, this is not a structured site specific viability assessment that is anticipated in the Planning Practice Guidance and which would normally accompany a Local Plan submission. St George's requires substantial demolition and remediation of contaminated land that will require some front loading, this has been considered in the HIF viability assessment. The early stage developments are likely to require less 'high cost' transport infrastructure than Woolfox and much of the utilities and transport infrastructure is already in place for early stage development (although not sufficient to support a fully built out scheme). The viability of St George's has the potential to be robust should a submitted 'Housing Infrastructure Fund' (HIF) bid be successful.

- 5.14 More detailed viability work is required for the Woolfox site in particular. In the case of St George's, the viability implications with and without the HIF bid should be assessed. Independent site specific assessments of viability for both sites would be beneficial in order to demonstrate deliverability. The viability assessments should accord with the recent changes to 'Planning Practice Guidance' which emphasise the enhanced role of Local Plans in assessing viability.
- 5.15 Without additional independent site specific assessment of viability, it is not possible to confirm that the Woolfox proposal would be 'justified' (in terms of evidence) or 'effective' (in terms of certainty of deliverability). The evidence at St George's is more comprehensive but needs to be provided in a format that would meet the requirements of the PPG and be sufficiently clear and accessible to the appointed Inspector.
- 5.16 An independent assessment of the viability evidence provided for each option with particular reference to the financial implications of infrastructure delivery over time would be beneficial.

#### Ownership and Identified developer partner

- 5.17 Both sites have willing promoters who have indicated a desire to deliver a mixed-use development.
- 5.18 Identifying developers who would deliver the homes or employment increases the certainty of delivery. Neither of the site promoters have engaged developer partners at the time of drafting this report. The St George's promoters have submitted information on the business model used in the disposal and delivery of land. Further work would be required by both promoters in engaging developer partners.
- 5.19 Given the early stage of site promotion, no site has a material advantage in identifying future development partners and no hindrance has been identified that would prevent the sites being considered 'justified' and 'effective' as potentially suitable options.

#### Legal constraints

- 5.20 No legal constraints have been identified that would deter either of the sites being considered as 'justified' as potentially suitable options. Further work will be required that demonstrates no covenants or other legal constraints exist that would inhibit deliverability.

## Environmental

### Flooding

- 5.21 The potential for flooding has been assessed at a high level. Independent evidence exists for both sites in the Council's Strategic Flood Risk Assessment (SFRA) and Environment Agency flood risk maps.
- 5.22 Additional high level evidence ('Initial assessment of flood risk') has been prepared for the Woolfox site promoters. Evidence indicates that the vast majority of both sites are within flood zone 1 and that both have small parts of the site that have the potential to be affected by surface water flooding.
- 5.23 The evidence broadly supports both sites as 'justified' alternative options for new settlements with no insurmountable flooding issues that would impact on deliverability. The evidence therefore indicates that the sites could be considered as 'effective' and consistent with Government Policy in the context of flooding.
- 5.24 The detailed opinion of the Environment Agency should be sought once the LPA has determined its preferred option and any proposed policy would benefit from a criterion that seeks to mitigate any adverse surface water issues.

### Landscape

- 5.25 Neither site is within a designated landscape area. The Landscape Character Assessment evidence carried out on behalf of the Local Planning Authority indicates that both sites are located within the 'Rutland Plateau' landscape character type. Woolfox and most of St George's are within the Natural England, 'Kesteven Uplands', National Character Area. The southern part of St George's is within the 'High Leicestershire' area. Both options are accompanied by landscape evidence that is consistent with the methodology promoted by the 'Landscape Institute' and 'Institute of Environmental Management & Assessment'. The evidence submitted by the site promoters for both sites suggests that both sites could accommodate growth without unacceptable adverse impacts on landscape.
- 5.26 If either site are promoted as potential allocations for new settlements a policy criterion should be attached that seeks to ensure that development responds to: important landscape features and topography, long distance views, important natural and man-made features (such as woodland, trees, scrub, ponds and hedgerows) and that a detailed masterplan should be prepared and agreed as part of submission of a planning application. The masterplan should set out in detail the proposed distribution and location of land uses and mitigation required to protect the important environmental features identified including landscape.
- 5.27 Initial independent assessment of the submitted landscape evidence indicates some flaws in the submitted evidence. However, in both cases these would be capable of being remedied and as such both sites appear to be potentially 'justified' in the context of landscape evidence. However, a professional independent analysis of any future submitted evidence and assessment

of the landscape impacts by a suitably qualified and experienced person is recommended to be certain that the sites are 'justified'. Independent evidence that assesses the submitted Landscape Character and Visual Impact Assessments suggests that there is the potential for some negative impacts arising from the proposals, particularly in terms of introducing large scale development into a landscape dominated by smaller settlements.

### Ecology (habitats and species)

- 5.28 The evidence broadly indicates that both sites have the potential to mitigate adverse ecological impacts and that net bio-diversity gains are possible within the substantial site areas. In the context of ecology no evidence has been identified to suggest 'show-stopping' constraints and both sites could be considered as 'justified' alternative options for new settlements.
- 5.29 Further discussions are required with Natural England to ensure that they are satisfied that the Woolfox site has no show-stopping adverse impacts on designations, habitats and species. The detailed views of Natural England should be sought in relation to policy requirements once the LPA has determined its preferred option.
- 5.30 RCC should establish whether a 'Statement of Common Ground' is required with Natural England to confirm their position.

### National / European designations

- 5.31 There are multiple Statutory Wildlife Designations that could be influenced by the new settlement options. The potential impacts on designated sites requires careful consideration. The impacts on Rutland Water (A Special Protection Area / SSSI / RAMSAR site) requires particularly careful consideration owing to its European level designation. Both sites have the potential for indirect impacts owing to increased visitor numbers. The St George's site has potential for indirect impacts on Rutland Water owing to its geographical proximity. Natural England have indicated that further information and details on a number of issues including water quality and the treatment of foul sewage, green infrastructure and biodiversity enhancements and the impact of functional land used by SPA birds. A 'Winter Bird Survey' (May 2019) has subsequently been produced for St George's which concludes "...there is an absence of SPA species within the airfield" and that the disturbance caused by use of the site reduces the suitability of the site as feeding ground for winter ducks.
- 5.32 The evidence broadly indicates that both sites have the potential to mitigate adverse impacts on designated sites and, at this stage, no 'show-stopping' constraints have been identified.
- 5.33 The formal opinions of Natural England will be critical in determining if either site could be considered as 'justified' alternative options for new settlements. Natural England have been engaged in the development of the St George's site and have confirmed this in writing. A 'Statement of Common Ground' with Natural England is recommended to confirm their position in relation to the preferred site.

## Minerals

- 5.34 Both sites are within a Mineral Protection Zone with the potential for economically viable extraction. The sites are both substantial and could have the potential to deliver the outstanding requirements for homes to meet the identified need whilst retaining the ability to extract mineral deposits.
- 5.35 SGB have undertaken detailed mineral assessment work to understand the nature, depth and chemical composition of the resource. This allows an informed understanding of the area of land which should be safeguarded from development and allows a better understanding of noise, dust and air quality issue. The Woolfox proposal requires additional evidence to fully understand the potential extent and quantity of economically viable extraction. No borehole testing or chemical analysis has been carried out. This evidence is required to determine which areas should be safeguarded from development in order that the mineral deposits are not sterilized by development. The work could also indicate where extraction might take place prior to development. Extraction and safeguarding could have significant implications on the design, phasing of the masterplan and viability of the development proposal. At this stage it is not possible to state with any certainty whether the Woolfox site would be 'justified' and 'effective' in respect of this criteria.
- 5.36 RCC should seek further information from the Woolfox promoters to demonstrate how the mineral reserve can be appropriately accommodated within the masterplanning of development of the site and to expand on the 'Minerals Position Statement'.
- 5.37 The St George's site is accompanied by a desk based assessment, borehole testing and chemical analysis. The Minerals 'Site Investigation Report' (2018) provides an assessment of the nature, depth and chemical composition of the resource. This allows an informed understanding of the area of land which should be safeguarded from development and allows a buffer to be identified in the masterplan. The evidence for this site is therefore considered to be 'justified' and 'effective'.

## Trees and woodlands

- 5.38 Both sites have submitted evidence in relation to the potential impacts of proposed development on trees and woodlands.
- 5.39 The evidence submitted for the Woolfox proposal contains detail in relation to the impacts on individual and groups of trees. The evidence indicates that there are five 'Ancient & Semi-natural woodlands' within the site. These would need to be protected as part of any development proposals. There are other notable individual specimens and groups of trees identified by the evidence.
- 5.40 The evidence in the St George's masterplan is 'high level'. This reflects the limited tree and woodland cover with only small areas of woodland and dispersed trees, some of which are associated with the golf course. New woodland planting is proposed as part of the masterplan.

- 5.41 Both sites have submitted 'proportionate' evidence in the context of tree and woodland cover. Given the early stage of masterplan preparations, and the substantial scale of the sites, both development proposals could allow high value trees and woodlands to be accommodated within future schemes.
- 5.42 No show-stopping tree / woodland constraints have been identified and both sites would be 'justified' allocations in the context of their impacts.

#### Air quality, noise and other pollutants

- 5.43 High level evidence relating to air quality, noise, vibration and other pollutants has been submitted for Woolfox. No detailed evidence has been submitted in relation to the St George's site.
- 5.44 The scale of the development sites are substantial with substantial scope for mitigation measures and distance separation from potential noise and pollution generators. It is likely that development could be accommodated without significant adverse impacts from existing noise and pollution sources.
- 5.45 Both sites have the potential for future mineral extraction within and adjacent the proposed development areas. The potential impacts of extraction (in terms of noise, vibration, dust and other pollutants) will need to be carefully assessed and independently scrutinised. This is particularly relevant for the Woolfox site, where the extent and nature of the minerals reserve is not yet fully understood, and therefore the potential impact of extraction on new development is not known.
- 5.46 Given the scale of sites both would be capable of being developed without adverse impacts, in the case of Woolfox mainly through securing distance separation from potential pollution sources. Based on the available evidence for Woolfox, the site is likely to be a 'justified' option for a New Settlement. In the absence of any immediately adjacent noise or air pollution generating development, St George's is also likely to be a 'justified' option for a New Settlement. Both would require assessment of the air quality and noise implications of nearby mineral extraction should this be pursued.

#### Land stability and contamination

- 5.47 Evidence has been submitted for both sites relating to Land stability and contamination.
- 5.48 A 'Geo-environmental desk study' (March 2019) has been submitted by the Woolfox site promoters. The report assesses the geo-technical and environmental risks within the site and off site influences. The report concludes that there are potential pockets of 'contamination' and 'made ground' within and adjacent the site and some potential for migrating radon gas and other contamination. Mitigation measures are likely to be required and further detailed site investigation work is recommended.
- 5.49 A 'Ground conditions technical note' and 'Demolition and Remediation Technical Note' have been prepared for St George's which seek to assess the ground condition constraints within and

adjacent to the site and identify the potential approach to remediation (Including costings). The reports identify the potential for potential contaminants including pH, heavy metals, non-metals and radon. The masterplan identifies several areas of potential instability and contamination.

- 5.50 In summary, mitigation measures are likely to be required for both sites if they are chosen as a preferred option. The scale of the development sites are sizable. Based on the available evidence, there appears to be substantial scope for any adverse ground conditions to be mitigated or avoided as part of the development and that the required levels of growth could be accommodated without significant adverse impacts.
- 5.51 Based on the evidence submitted, and the potential for mitigation measures, St George's appears to be 'potentially justified' in the context of Land stability and contamination evidence. Further detailed site investigation would be required in relation to the Woolfox site (including the cost of remediation and the implications for viability. This should be a requirement of any emerging policy if either sites are identified as allocations.

### Topography

- 5.52 Both sites appear largely unconstrained in terms of their topography and have the potential for a design that responds to site contours, both sites appear to be potentially 'justified' allocations in the context of topography.

### Heritage (Designated and non-designated heritage assets and their settings)

- 5.53 Submitted evidence indicates that both sites have the potential for impacts on heritage assets. In the case of the Woolfox proposal the impacts relate to non-designated assets and the 'setting' of designated assets (including nearby Conservation Areas / listed building). At St George's, the site contains the grade II\* listed Thor missile site. Both sites contain non-designated heritage assets associated with their former use. There is potential to retain important heritage assets within future developments and to provide public benefits through interpretation and access.
- 5.54 Evidence gathered to date suggests that both sites could be developed with less than substantial harm to heritage assets and that there are public benefits associated with development. Appropriate masterplanning and design should be able to satisfactorily mitigate any adverse impacts.
- 5.55 Historic England (HE) have made multiple representations concerning the St George's proposal as part of ongoing Duty to Cooperate discussions and this resulted in additional work being carried out by the site promoters. At this stage, there has been no 'objection in principle' to the St George's site from HE. The opinion of HE has been sought in relation to the Woolfox scheme. The initial response indicates that it is not possible to provide a comprehensive response without more detailed assessment, but that there are designated and non-designated assets that need to be considered.
- 5.56 Further independent heritage assessment work would assist the LPA in assessing the merits of each site in an impartial, open and robust manner. Notwithstanding this, based on the evidence

available, there appears to be substantial scope to satisfactorily mitigate heritage assets and their settings within the substantial development areas. Both sites could be considered as 'justified' options in the context of heritage assets. A Statement of Common Ground with Historic England in relation to the preferred option is recommended.

#### Best & Most Versatile Agricultural Land.

- 5.57 The majority of land within both sites are of low to moderate likelihood of Best and Most Versatile Agricultural Land. The land at Woolfox is currently in agricultural use. There would not appear to be any 'net-loss' of agricultural land at St George's where the site is currently unfarmed and used for military purposes.
- 5.58 In the context of impacts on agricultural land (and in particular Best & Most Versatile Land), both sites appear to be 'justified' as potential options.

#### Previously Developed land

- 5.59 The National Planning Policy Framework defines 'Previously Developed Land' (PDL) as:
- "Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape."*
- 5.60 In light of the above definition, PDL includes any buildings and their curtilages, the parts of the runways that have not been returned to agricultural use.
- 5.61 The proposed development at Woolfox would contain only a very modest proportion of the development on PDL (mainly the parts of the runway that have not yet blended into the landscape). The use of the airfield ceased some years ago and a 'curtilage' cannot be identified on site.
- 5.62 The curtilage for St George's Barracks is defined by the security fencing. The definition of PDL within the NPPF includes the 'curtilage' of the developed land (although it should not be assumed that the whole of the curtilage should be developed). In accordance with this definition, the whole site could be considered PDL, however, some areas are clearly undeveloped. The masterplan indicates that most of the built form will be on areas currently occupied by the buildings and structures associated with current and previous use of the site and the barracks.



- 5.63 The proposed St George’s development is consistent with national policy and would be ‘justified’ as a potential allocation in the context of previously developed land. Development at Woolfox would involve substantial areas of Greenfield land and is not broadly consistent with the NPPF in this respect.

#### Urban Design / Garden village principles

- 5.64 The evidence supports the proposition that there are no insurmountable barriers to developing high quality, well connected and distinctive places on either site. Further work is required on both sites in order to develop a responsive design framework, including more detailed masterplans, design codes and design parameters for different parts of the sites.
- 5.65 It would be possible for both site promoters to develop proposals that would result in a high quality design and meet the principles of garden villages. Both sites are considered as ‘justified’ options for new garden villages in this regard. St George’s has recently been identified as one of 19 successful bids to the Garden Communities programme by the Ministry of Housing Communities and Local Government in July 2019.

#### Infrastructure<sup>9</sup>

##### Provision of Schools

- 5.66 The Woolfox masterplan identifies provision of three x two form entry primary schools and a secondary school. Further work is required from the Woolfox site promoter to determine whether this is an appropriate quantum of school places for the scale of development proposed and to add certainty to the delivery of schools. The ‘in-principle’ support of the LEA is required and the identification of a potential Academy Partner (or other operator) would be beneficial. Further work is also required in relation to the ‘viability’ implications of delivering schools at the outset to establish sustainable travel patterns for new pupils.
- 5.67 The evidence in relation to St George’s identifies the provision of a two form entry primary school on site. It is proposed that the Edith Weston Academy would be relocated to the new school site and this is evidenced in a letter of support in principle from the Brooke Hill Academy Trust. In terms of secondary education, the evidence promoting St George’s indicates that there is capacity in two secondary schools within a reasonable travelling distance to accommodate additional pupils and that the scale of development proposed here would not warrant onsite provision of a new secondary school.
- 5.68 Based on the available evidence and discussions with the Local Education Authority, both sites have the potential to deliver the required education provision on site and can therefore be considered ‘potentially justified’ in the context of education provision. Woolfox is constrained in accommodating primary school pupils in the early years of development as there is no primary school provision in close proximity and further information is required in order to demonstrate

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<sup>9</sup> The assessment will identify where development can access existing infrastructure and / or where there is potential to provide new infrastructure on site.

that the provision would support the numbers of students generated using established average 'yield' rates. The provision of 3 x 2FE primary schools would not be sufficient at Woolfox based on average yield rates of 21 primary pupils per 100 houses. St George's proposal includes evidence that work with the LEA and an academy provider is well advanced, and a fully costed school proposal is included within the viability work supporting the HIF submission.

#### Provision of Health Care (primary care)

- 5.69 Both sites will result in pressure on existing primary care facilities. Both sites have the potential to accommodate primary care facilities within a new local centre.
- 5.70 The LPA's CIL charging schedule identifies new and expanded GP facilities as an areas where funding is to be provided.
- 5.71 St George's makes a definitive commitment to a new health centre in the masterplan and a letter of support from East Leicestershire & Rutland Clinical Commissioning Group has been provided by the site promoters.
- 5.72 The Woolfox site would technically be able to deliver health facilities on site and reference is made in the Masterplan to accommodating this within a mixed-use centre.
- 5.73 Based on the available evidence and discussions with the Clinical Commissioning Group, both sites have the potential to deliver the required primary care provision on site and can therefore be considered 'justified' and 'deliverable' in the context of health provision.
- 5.74 Further work is required from both site promoters to identify how 'early stage' developments would accommodate patients and to add certainty to the delivery of GP practices. The 'in-principle' support of the CCG is required and an indication of any potential GP practice Partner (or other operator) would be beneficial.
- 5.75 The impact of health care on viability needs to be assessed. The St George's proposal contains a 'costed' scheme.

#### Utilities (including water, power and telecommunications)

- 5.76 Both sites have the potential to exceed the available capacity of utilities provision (electricity, water supply, waste water disposal). It is apparent, from the evidence available, that 'technically' both sites would be able to mitigate any shortfalls in capacity.
- 5.77 Further work needs to be undertaken to understand the costs associated with improving provision (particularly at Woolfox where very limited information has been provided in relation to the cost of infrastructure provision). The provision of a gas supply at Woolfox appears to be more problematic, but this is not a 'showstopper', however it will impact on the need to for sufficient supply of electricity for heating and will therefore impact on the scale and nature of electricity supply feeding the site, in the context of the availability of alternative sources of

energy and the objective of moving away from fossil fuels may be an important consideration which should be factored into a masterplan and will inevitably have an impact on viability.

- 5.78 St George's Barracks is a functioning facility with existing provision of utilities for the current operations and associated accommodation. The provision of enhanced utilities has been costed for St George's and detailed in a 'Utilities Technical Note'. Increased capacity will be required in the longer term. Discussions with utilities providers indicate that the initial phase should be able to be accommodated without the need to upgrade supply.
- 5.79 Given the scale of the proposals and existing utilities infrastructure within and adjacent to the sites, it would appear technically possible to mitigate any impacts, however this will be at a cost. Whilst the St George's proposal has costed these requirements they appear to be largely unknown for the Woolfox proposal and may impact on the viability of the scheme. Further engagement is required with the utilities providers to confirm that there are no 'showstoppers' and that utility requirements will not have an abnormal effect on viability and that the site is therefore 'effective' in the context of deliverability. It should be noted that both sites will be affected by substantial infrastructure improvements and potentially costs associated with the provision of 'hook-up' points for electric vehicles.
- 5.80 Available evidence and discussions with utility providers indicates that there are technical solutions to provision and that both sites would be 'justified' as potential options, subject to viability implications.

#### Retail facilities

- 5.81 Based on the submitted masterplans, both sites have the potential to accommodate retail uses within a defined local centre and can therefore be considered 'justified' in the context of retail provision. There is no certainty of delivery that result in the sites being considered 'effective'.
- 5.82 Given the quantum of potential population there is a critical mass of population that would support retail provision. Further evidence, through submission of an application or detailed masterplan, will clarify the amount of retail floorspace that is justified on site and the potential impacts on existing centres.

#### Community facilities

- 5.83 Both sites will result in the potential to generate communities of sufficient scale that would be capable of supporting community facilities such as community halls. Both sites identify proposed new local centres which could accommodate these facilities.
- 5.84 Whilst there is no certainty of delivery, there are no reasons to suggest that the sites could not be considered potentially 'justified' and 'effective' in delivering such uses.

## Parks and Open Spaces

- 5.85 The Masterplans both identify substantial parts of the sites that are identified as green space that could contain open spaces suitable for play and sports provision.
- 5.86 Further work would be required from the preferred site promoter to identify the precise locations and form of POS through more detailed / fine grained masterplans. If Woolfox is the preferred option, the masterplan should address how the satellite POS provision to the east of the site would be accessed. Notwithstanding this, the evidence submitted to date is proportionate.
- 5.87 The substantial scale of both proposals and the potential POS solutions identified in the submitted illustrative masterplans demonstrate that both sites are potentially 'justified' and 'effective' solutions in the context of POS delivery.

## Strategic Green Infrastructure

- 5.88 Both Masterplans identify substantial parts of the sites that could be considered Strategic Green Infrastructure including large areas of accessible green spaces linked by a series of green corridors. The masterplan evidence is proportionate in terms of identifying that, in principle, both sites are capable of delivering appropriate levels of GI.
- 5.89 The substantial scale of both proposals and the potential for Green Infrastructure identified in the submitted illustrative masterplans demonstrate that both sites are potentially 'justified' and 'effective' solutions in the context of POS delivery.

## Transport

### Impacts of development traffic

- 5.90 The Local Planning Authority will need to provide a 'proportionate' evidence base to demonstrate that their preferred choice of site is justified in the context of transport impacts and implications.
- 5.91 A Transport Assessment has been prepared for St George's site and an 'Initial Transport appraisal' for Woolfox. These reports have been prepared on behalf of the site promoters to support the proposals. The technical merits of each of the submitted reports is beyond the scope of this report.
- 5.92 The 'Initial Transport Assessment' for Woolfox is at a very high level given the proposed scale of development. It is apparent that further transport evidence would be required in order to support the Woolfox proposal as a 'justified' allocation. This is acknowledged by the site promoters. At the time of completing this report a Transport Assessment had recently been submitted by the Woolfox promoters but had not been independently scrutinised. It is recommended that the report be robustly assessed.

- 5.93 The SGB transport assessment considers the impact of traffic arising from a development of 2,500 homes and c.62,000 sq. m of employment floorspace. The report uses TRICs database to calculate trip generation and volume of movements and how trips will be distributed. The impact on key junctions is considered using Ratio to Flow Capacity (RFC) to assess where there are identified constraints and where junction improvements will be required including possible solutions as mitigation. The mitigation measures are costed.
- 5.94 The Local Highway Authority and Highways England will need to confirm that they are satisfied with the submitted evidence and that it is a proportionate evidence base. Evidence of discussions between the LPA and Highways England in relation to St George's has indicated that HE have no objection in principle. Similar discussions should be held in relation to Woolfox.
- 5.95 An independent assessment of the technical merits and findings contained within the transport reports would demonstrate that the LPA has approached each site in an open and consistent manner. There will be an expectation from the appointed Planning Inspector that the transport impacts and implications of reasonable options have been considered in this way.
- 5.96 At the time of drafting this report, the transport evidence provided in relation to the St George's site is proportionate when compared to other sound Local Plan evidence bases. Subject to independent scrutiny of the detailed technical content, it appears that the site could be 'justified' as a potential allocation.
- 5.97 In the context of Woolfox, at the time of drafting this report, a Transport Assessment had been recently been submitted by the Woolfox promoters but not yet independently assessed. Subject to the full TA being considered robust and addressing the deficiencies in the initial Transport evidence shortcomings in the evidence could be remedied However without this evidence the site cannot be considered justified, The costings and viability implications of transport infrastructure also need to be assessed.

#### Availability of public transport

- 5.98 Both proposals identify improvements to public transport. The evidence for the Woolfox proposal is at a high level and further evidence would be required to support a more detailed proposal including identifying a potential operator and costs of provision (to be included in any viability assessment). Costings have been provided for the St George's site.
- 5.99 The evidence provided at this stage is 'proportionate' to demonstrate a commitment to public transport provision and both sites would be 'justified' as potential allocations. Further work would be required in relation to viability in order to demonstrate that the proposed public transport improvements are deliverable.
- 5.100 At this stage both sites could be considered 'justified' in the context of public transport provision, although further work will be required in order to test viability and to increase certainty from potential bus operators.

### Access to cycling networks

- 5.101 Both proposals identify potential improvements to cycling. The evidence for St George's site includes potential costs. Woolfox requires costings to be identified. Both sites require costings to be included in any viability assessment.
- 5.102 The evidence provided at this stage is 'proportionate' to demonstrate a commitment to cycling provision and both sites would be 'justified' as potential allocations. Emerging policy could seek provision of on and off site cycling facilities. A requirement to provide detailed masterplans could be included in any emerging policy in terms of provision of walking and cycling facilities.
- 5.103 At this stage both sites could be considered justified in the context of cycling provision.

### Access to public footpath networks

- 5.104 Both proposals identify potential improvements to walking. The evidence for St George's site includes potential costs. Woolfox requires costings to be included. Viability assessment work needs to include walking improvement costs.
- 5.105 The evidence provided at this stage is 'proportionate' to demonstrate a commitment to walking and both sites would be 'justified' as potential allocations. Emerging policy could seek provision of on and off site cycling facilities. A requirement to provide detailed masterplans could be included in any emerging policy in terms of provision of walking and cycling facilities.
- 5.106 At this stage both sites could be considered justified in the context of pedestrian access.

### Impact on public rights of way

- 5.107 Both proposals have an impact on Public Rights of Way. Emerging masterplans and detailed designs have the potential to accommodate public rights of way within development proposals.
- 5.108 Rights of Way maps have been used to identify existing routes and the evidence provided at this stage is 'proportionate' to demonstrate that PRoW have been considered.
- 5.109 At this stage both sites could be considered justified in the context of Public Rights of way.

### Potential to incorporate new transport technologies

- 5.110 Transport technologies are likely to change over the duration of the Rutland Local Plan. Electric and zero-emission vehicles, self-driving vehicles, increased role of GPS in transport choice and smart transport solutions.

- 5.111 The transport assessment and masterplans for both sites are not detailed at this stage. Whilst there are cost implications for delivering new transport technologies (primarily the infrastructure costs of providing additional electricity capacity for electric vehicles) no overriding reasons have been identified that would indicate that either site would not, in principle, be able to provide for technological advances in transport. The provision of ‘Electric Vehicle Charging Points’ is costed for St George’s. Viability implications will need to be assessed further at Woolfox.
- 5.112 Both sites have the potential to incorporate transport technologies. There are implications for viability that need to be considered in more detail given increased capacity requirements for electric hook up points. In this respect both sites have the potential be considered as ‘justified’ and consistent with national policy. Both sites could be considered ‘effective’ subject to the findings of independent viability assessment.

#### Major transport infrastructure

- 5.113 The Council should commission an independent assessment of the merits of the Transport Assessments for both sites which would consider, amongst other things, the potential impacts of the major transport infrastructure.
- 5.114 In the context of Woolfox, the ‘Initial Transport Appraisal’ identifies the requirement for a grade separated junction on the A1. A Transport Assessment had been submitted at the time of finalizing this report, this has not been independently assessed but may consider the impacts of the proposed new A1 junction in more detail.
- 5.115 Discussions have been held with Highways England in relation to St George’s. No major infrastructure requirements have been identified and no objection in principle from Highways England.
- 5.116 A Statement of Common Ground would be required with Highways England if Woolfox is the preferred option for a New Settlement to ensure that all issues relating to impact on the Strategic Highway Network have been appropriately addressed and that potential mitigation solutions are achievable.

### Economy

#### Employment Land provision

- 5.117 Both Woolfox and St George’s would exceed the outstanding requirements for employment during the plan period. The provision of employment land above the outstanding requirements, as identified in the evidence, is not considered detrimental. It reflects the NPPF approach to Economic Growth, allows flexibility and provides a mix of uses that allow the potential for co-location of work and homes. In this respect both are ‘justified’ solutions to meeting outstanding employment land needs.

- 5.118 Further information regarding an employment trajectory and start dates will be required to help inform the final choice of a preferred option. Notwithstanding the longer lead-in times associated with strategic developments, it is reasonable to assume that both sites would be capable of delivering outstanding employment requirements during the plan period.
- 5.119 The employment Strategy report for St George's and 'Economic benefits' report broadly identify the type of employment that could be provided. A letter of support from the Local Enterprise Partnership has been supplied.
- 5.120 In terms of the potential to meet employment needs both sites appear to be 'justified' 'effective' and 'consistent with National Policy'.

#### Construction and longer term economic benefits

- 5.121 Both sites have the potential for long term economic benefits associated with growth.
- 5.122 The Woolfox evidence contains a more detailed examination of the potential economic benefits associated with development. The St George's evidence concentrates on the impacts on jobs. A broad indication of the associated economic benefits could be carried out for the St George's site to clarify potential impacts. Anecdotal evidence suggests that these would be proportionately consistent with those identified at Woolfox
- 5.123 At this stage, both sites could be considered 'justified' and consistent with National Policy in terms of Construction and longer term economic benefits.

#### National policy and strategic principles

#### Consistency with National Policy

- 5.124 Both sites have the potential to be broadly consistent with National Policy as set out in the NPPF.
- 5.125 More detailed masterplanning, phasing and delivery plans and detailed design will inform both sites ability to meet other elements of the NPPF including: 'promoting sustainable transport'; 'Promoting healthy lifestyles'; 'securing high quality design'; and 'meeting the challenges of climate change'. This could be achieved as part of a planning application submission in advance of determination.
- 5.126 At this stage, both sites could be considered broadly consistent with National Policy and there is potential to remedy / clarify any areas where consistency is not clear.

#### Larger scale development

- 5.127 The NPPF supports new settlements that are well located and designed, and supported by the necessary infrastructure and facilities. The LPA is able to identify such sites in Local Plans and should:



- Consider the opportunities to provide infrastructure, Economic potential and scope for net environmental gains;
- Ensure the size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or to larger towns with good access;
- Set clear expectations for design quality (following Garden Community principles), securing a variety of homes to meet needs
- Make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation.

5.128 The evidence submitted in relation to both proposed new settlements is broadly sufficient to indicate that they could support new communities and have the potential to link to higher order services, facilities and employment in nearby settlements at Oakham and Stamford in the short term.

5.129 In the longer term an element of self-containment is desirable and is possible through the provision of employment, education, retail and social infrastructure on both sites (subject to viability assessment).

5.130 At this stage, both sites could be considered broadly consistent with National Policy in terms of the delivery of 'Larger scale development'. There is potential to clarify any areas where consistency is not clear.

#### Healthy lifestyles

5.131 The NPPF supports healthy and safe communities. Developments are encouraged to:

- Promote social interaction;
- Be safe and accessible;
- Enable and support healthy lifestyles;
- Provide the social, recreational and cultural facilities and services the community needs.

5.132 Planning Practice Guidance was updated in July 2019 to encourage LPAs to plan positively to contribute to healthier communities. Criteria to improve health could be included in the Planning policies for the sites.

5.133 The proposed new settlements both have the potential to deliver healthy, inclusive and safe places and both sites could be considered broadly consistent with National Policy in this regard. There is potential to identify how these issues are to be addressed as masterplans evolve.

#### Creating a strong economy

5.134 Section 6 of the NPPF supports Building a strong, competitive economy. Planning policies are encouraged to:

- Encourage sustainable economic growth
- Identify strategic sites for local and inward investment
- Address barriers to investment, such as inadequate infrastructure, and
- Be flexible enough to accommodate needs not anticipated in the plan.

5.135 The evidence provided for both sites supports the proposition that they have the potential for economic benefits through the creation of new employment floorspace and creation of new jobs. Both sites provide for employment land over and above the outstanding requirements identified in the emerging Local Plan.

5.136 Both sites have the potential to be consistent with the NPPF in terms of creating a strong economy.

### Boosting the supply of housing

5.137 Paragraph 59 of the NPPF considers the Government’s objective of significantly boosting the supply of homes. Delivering new homes lies at the heart of the Government’s planning policies. Section 5 of the NPPF (2019) encourages LPAs to:

- Provide a sufficient amount of land to meet need;
- Provide sites to meet the needs of groups with specific housing requirements (such as affordable housing, families with children, older people, students, people with disabilities);
- Provide a mix in terms of size, type and tenure;
- Include a trajectory illustrating the expected rate of housing delivery over the plan period.

5.138 The evidence provided for both sites indicates that they have the potential to accommodate the outstanding housing requirements. St George’s has a more detailed trajectory. Both sites promote a mix of housing types.

5.139 Both sites have the potential to be consistent with the NPPF in terms of boosting the supply of housing. Trajectories need to be challenged to ensure that lead in times and delivery rates are realistic and that the delivery rates are supported in the associated viability assessments. The full proposal (10,000 houses) at the Woolfox would result in a substantial overprovision against the identified requirements. If Woolfox is identified as the preferred site, the implications of this overprovision would need to be fully assessed in terms of the duty to co-operate and the need to consider strategic housing growth across county boundaries.

### Affordable Housing

5.140 The NPPF encourages Local Planning Authorities to meet the needs of groups with specific housing requirements including affordable housing. Where a need is identified LPAs are encouraged to identify tenure.

- 5.141 The evidence provided for both sites indicates that they have the potential to accommodate 30% affordable housing, albeit with different tenure mix.
- 5.142 Given the significant financial implications of delivering affordable housing and the implications for site viability, an independent assessment of the viability implications is recommended. The findings of this work will confirm whether the sites are 'justified' as site options and potentially 'effective' in terms of their delivery.
- 5.143 Both sites have the potential, in principle, to be consistent with the NPPF in terms of delivering affordable housing.

#### Maintaining Strategic gaps between settlements and protecting local character

- 5.144 Avoiding the coalescence of settlements is a longstanding objective of the planning system.
- 5.145 No coalescence or visual adverse implications for strategic gaps have been identified for the Woolfox proposal.
- 5.146 The St George's proposal has greater potential to result in a visual narrowing of the gap between existing settlements at Edith Weston by creating a harder northern edge. However, there is already built development associated with the use of the site for military purposes in this location and the emerging masterplan indicates that strategic gaps will be retained between the proposed development and existing village and consultation has been undertaken with the community to address this issue.
- 5.147 The evidence provided for both sites indicates that they could be delivered without significant adverse impacts on strategic gaps and coalescence. Both sites have the potential to be 'justified' and 'effective' in this respect.

#### Scale in comparison with host settlement

- 5.148 The Woolfox proposal is comparatively remote and there is no clear 'host' settlement that would be affected.
- 5.149 The St George's proposal has greater potential impacts in terms of the scale of development on nearby host settlements of North Luffenham and Edith Weston where there is a close functional relationship. Edith Weston is a 'Local Service Centre' and could act as a 'host' settlement in the early years of development providing access to services and facilities. Given the scale of development, St George's would become the dominant settlement at its full extent in the longer term.
- 5.150 In terms of St George's, there is already built development and population associated with the use of the site for military purposes. The scale of development (c.2,215 houses / 5,000 population) is however, substantially larger than both Edith Weston and North Luffenham. The impacts will largely depend on the final built form and timing and delivery of associated

infrastructure. Notwithstanding the increase in house numbers and population, no evidence suggests that the site could not be 'justified' in terms of scale in comparison with a host settlement. The impacts on these settlements can be mitigated through limiting the scale and extent of growth and delivering the necessary infrastructure in a timely fashion.

## 6. Conclusions and Recommendations

### Conclusions

- 6.1 The report has been prepared to offer an impartial assessment of the evidence submitted in relation to two options for mixed-use New Settlements in Rutland County. The site options, St George's Barracks (Edith Weston) and Woolfox (Clipsham) have been put forward to meet outstanding development requirements in the emerging 'Rutland Local Plan Review' and beyond.
- 6.2 The main aim of the report is to identify whether the sites would potentially meet the tests of soundness (as defined in paragraph 39 of the National Planning Policy Framework 2019) if they were to be submitted for examination.
- 6.3 The report looks at 41 key issues and considers whether either, neither or both of the options would be 'justified' or 'effective' allocations in the context of these. The report also considers whether the evidence indicates whether the options are consistent with Government Policy contained in the National Planning Policy Framework (NPPF) and in Planning Practice Guidance.
- 6.4 The main conclusions are:

### Overall Evidence

- 6.5 A substantial amount of evidence has been prepared by site promoters for both sites which addresses the majority of key issues. Additional evidence is available in relation to some key issues from independent sources (such as Government departments and associated Government agencies)
- 6.6 The key areas where a proportionate evidence has been submitted for both sites, or is available from independent sources, includes: Overall site capacity, Ownership and legal constraints, Flooding, Trees and woodlands, Air quality, noise and other pollutants, Land stability and contamination, Topography, Heritage (Designated and non-designated heritage assets and their settings), Best & Most Versatile Agricultural Land, Re-use of Previously Developed land, Urban Design / Garden village principles, Retail facilities, Community facilities, Parks and Open Spaces, Strategic Green Infrastructure, Potential for public transport, Access to cycling networks, Access to public footpath networks, Impact on public rights of way and Potential to incorporate new transport technologies, Employment Land provision, Construction and longer term economic

benefits. In relation to all of these issues, the report's author concludes that both site options would likely be considered 'justified' and 'effective' in the context of the 'tests of soundness'.

- 6.7 In addition the report has identified that there are some key areas where the evidence does not conclusively demonstrate that the site options would be 'justified' (in terms of current evidence) or 'effective' (in terms of evidence supporting the proposition that they are likely to be delivered during the plan period). Additional evidence, or independent assessment of submitted evidence, is required in the following key areas:

### Viability

- 6.8 The National Planning Policy Framework (paragraph 34) and section 10 (Viability) of the Planning Practice Guidance (recently updated in May 2019) place an increased emphasis on demonstrating viability (and therefore deliverability) at the Local Plan production stage. Decisions around viability should not be deferred until planning applications are submitted.
- 6.9 Both site options have submitted some viability evidence. The evidence submitted by the Woolfox promoters is insufficiently detailed and does not conclusively support the site as a 'justified' or 'effective' option. In particular this assessment does not include a range of significant infrastructure costs which would normally be expected for a development of this scale. The estimated return to developer is low when benchmarked against normal custom and practice (15 – 20%) and the contribution costs per unit appear low in light of the significant infrastructure requirements. Some independent 'benchmarking' evidence is recommended.
- 6.10 The costings and viability evidence submitted for the St George's site is much more comprehensive but is not currently 'self-contained' or accessible in one document. A HIF bid has been submitted which has been subject to detailed scrutiny by Homes England – this includes benchmarking of costs and infrastructure provision against other "similar" schemes. If successful the HIF is expected to have a positive impact on viability. At the time of drafting this report, no decision had been made on this bid. The viability implications with and without the HIF bid should therefore be independently assessed.
- 6.11 An independent assessment of submitted viability evidence for both sites needs to be undertaken. Ideally, the Local Planning Authority should commission a suitably qualified and experienced person to independently scrutinise the submitted evidence and ultimately produce independent site specific viability assessments. This will accompany the 'whole plan' viability assessment already undertaken for the emerging plan.

### Landscape

- 6.12 Comprehensive Landscape Assessment and Landscape Visual Impact Assessments have been submitted by both site promoters. Both reports broadly indicate that development could be satisfactorily assimilated into the landscape and that the potential impacts are capable of being mitigated. However, the LPA should commission independent evidence from a suitably qualified and experienced professional to confirm whether the findings of the submitted reports are robust.

## Transport

- 6.13 Both site options have submitted transport evidence.
- 6.14 The Woolfox evidence is a very high level 'Initial Transport Appraisal' and identifies that a full Transport Assessment is required. In the absence of this, the Woolfox proposal cannot conclusively be supported as a 'justified' or 'effective' option. This could be remedied by the production of a robust full Transport assessment. At the time of drafting this report, a TA had been submitted by the Woolfox site promoters. The TA will need to be considered in an independent manner, and it is assumed that an assessment will be carried by the Local Highway Authority. The impacts of the Woolfox proposal on the A1 trunk road will need to be considered in detail by Highways England.
- 6.15 The transport evidence produced for St George's is more comprehensive and appears proportionate when benchmarked. However, an assessment of the technical merits is beyond the skill-set of this author and an independent assessment of the submitted transport evidence for both sites needs to be undertaken by suitably qualified and experienced person. This should assess whether the submitted TA provides a robust and proportionate evidence base.
- 6.16 A 'Statement of Common Ground' (SoCG) with Highways England would give certainty to any Inspector that development would not have an unsatisfactory impact on the trunk road network, particularly in relation to Woolfox.

## Ecology (habitats and species) and Habitats Regulation Assessment

- 6.17 Both site options have submitted phase 1 Habitat Surveys. Both reports identify that survey work has been undertaken at 'sub-optimal' times of the year. Additional work has been carried out in relation to the St George's site including winter bird surveys. The 'Preliminary Ecological Appraisal' for Woolfox indicates that 'Further survey effort for birds will be undertaken'. Both reports indicate that any adverse impacts can be mitigated. At this stage, a proportionate evidence base appears to have been prepared but the technical merits of each are beyond the skill-set of this author and confirmation by a suitably qualified ecologist is required.
- 6.18 Natural England will need to confirm that they are satisfied that the submitted evidence is proportionate and robust. In addition, the Habitat Regulation Assessment for St George's (and potentially Woolfox) will need to address potential impacts on Rutland Water arising from the options.
- 6.19 Natural England have been engaged in relation to the potential development at St George's and will need to be similarly engaged for Woolfox. A Statement of Common Ground with Natural England in relation to the preferred option would give comfort to an Independent Inspector that ecological impacts can be satisfactorily mitigated and that a robust HRA has been carried out, including Appropriate Assessment where necessary.

## Minerals

- 6.20 Evidence considering the potential impacts on economically workable minerals has been submitted for both sites.
- 6.21 Further work is required in relation to Woolfox in order to understand the extent of economically viable mineral reserves and their geographical distribution within the site. No borehole testing or chemical analysis has been carried out. Northamptonshire County Council act as agents for the Mineral Planning Authority and have confirmed that borehole testing would be required in order to establish the extent of Clipsham Stone. Details on the implications of this on the masterplan and phasing of proposed development in relation to proposed residential development is sought.
- 6.22 Borehole testing and chemical analysis has been carried out for St George's and the extent of workable minerals is identified in the St George's masterplan. Northamptonshire County Council (agents for the Mineral Planning Authority) have confirmed that they have considered the St George's minerals report including the Chemical analysis. No 'in-principle' objections have been raised. Details on the phasing of proposed development in relation to proposed residential development is sought.
- 6.23 Confirmation will be required from the Minerals Planning Authority's agents (Northamptonshire County Council) that the evidence submitted is robust and that development options will not unacceptably sterilise economically workable mineral reserves. No 'in-principle' objection has been received in relation to the submitted evidence at St George's and this site would appear to be 'justified'. Further work is required in relation to Woolfox where borehole testing would be required in order to state with certainty that this site option would be 'justified'.

## Provision of Education facilities

- 6.24 Both proposals identify a commitment to delivering the necessary education infrastructure. No insurmountable constraints have been identified in discussion with the Local Education Authority in terms of delivery, the viability implications need to be fully and independently assessed.
- 6.25 Evidence submitted in relation to the St George's site indicates that there is agreement in principle from an existing Academy to deliver primary education and that there is capacity in local schools to deliver the secondary places for the scale of development proposed. The Local Education Authority have identified that they support the proposal in principle. If the site is proposed as a preferred option then a phasing and delivery evidence will be required.
- 6.26 Further work is required in relation to Woolfox to justify the proposed provision of primary and secondary education identified in the masterplan (3 x 2FE primary schools). Yield rates of 21 primary pupils per 100 houses would require substantially more primary education provision.

Evidence of 'support in principle' of the Local Education Authority (and ideally an Academy) would provide more certainty.

- 6.27 A Statement of Common ground with the Local Education Authority<sup>10</sup> would give certainty to any Inspector that education provision can be satisfactorily delivered.

#### Provision of health facilities

- 6.28 Both proposals identify a commitment to delivering health infrastructure. No insurmountable constraints have been identified in discussion with East Leicestershire and Rutland Clinical Commissioning Group.
- 6.29 In terms of delivery, the viability implications need to be fully and independently assessed. These have been prepared for St George's and included within the viability work for the site, however they have not been included in the Woolfox work
- 6.30 A Statement of Common ground with the CCG would give certainty to any Inspector that health provision can be satisfactorily delivered.

#### Utilities (including water, power and telecommunications)

- 6.31 No insurmountable technical constraints have been identified following discussions with utilities providers (Power and Water companies).
- 6.32 The viability implications of providing new, and relocating existing, infrastructure need to be fully and independently assessed. There are potentially substantial costs of meeting future infrastructure requirements for electricity (as a result of the phasing out of gas and increase in charging points for electric vehicles). The viability assessment for St George's indicates that some £18.8 million<sup>11</sup> are proposed for utility upgrades. Further evidence would be required in relation to Woolfox to give certainty that utilities can be adequately provided.

#### Other recommendations

- 6.33 The availability of evidence in a comprehensive, open, clear and transparent fashion will assist interested parties in understanding the ultimate preferred choice of New Settlement (if any). The evidence in relation to Woolfox (other than commercially sensitive viability evidence) is publically accessible on the relevant web-site. Some of the evidence underpinning the St George's evidence is available on the web-site but some is not. It is acknowledged that because of the quantity and complexity of evidence that it has not been made available in its entirety.

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<sup>10</sup> Rutland County Council is both the Local Planning Authority and Local education Authority so SoCGs between the same Local Authority are not normal custom and practice.

<sup>11</sup> St George's Viability Report November 2018.



However, other than commercially / operationally or environmentally sensitive information (such as protected species) all information should be publicly available to allow scrutiny.

- 6.34 The evidence underpinning the choice of site will ultimately need to be provided to the appointed Local Plan Inspector and made available on the Council's web-site.

## Reasonable Options

- 6.35 Whilst it is not the main purpose of this report, the author has considered whether any evidence suggests that either or both sites could not be considered 'reasonable' options. Based on the evidence submitted, and the ability to remedy any shortfall in evidence provided, the author concludes that both sites are 'Reasonable Options' that need to be appropriately considered through a Sustainability Appraisal incorporating Strategic Environmental Assessment. The implications of the proposed options also need to be fully considered through Habitats Regulation Assessment (including Appropriate Assessment where required).

## 7. Site option merits

- 7.1 It is outside of the remit of this report to identify a 'preferred' option for a new settlement. This is solely a matter for the Local Planning Authority based on the evidence available. The author has, however, considered the broad merits of each site in the context of the evidence provided. The positive and negative characteristics from each site (in the context of whether they are justified, effective and consistent with National Policy) are set out below:

### Woolfox

- 7.2 Evidence that supports the proposal as a 'justified' and 'effective' option:
- Ability to deliver the quantum of housing development required (subject to viability);
  - Potential for most of the site to be assimilated into the landscape;
  - No heritage assets within the site and potential to mitigate the impacts on the settings of those outside;
  - Ability to deliver the quantum of economic development;
  - Capacity to deliver a mix of uses;
  - Ability to provide open spaces and green infrastructure; and
  - No impact on strategic gaps with any existing settlements.
- 7.3 Further evidence would be required to support the proposal as a 'justified' and 'effective' option in terms of:
- Provision of a robust housing trajectory;

- How to deliver short term social infrastructure in the absence of a host community (health, retail, schools etc.);
- Phased viability work to support the delivery of the substantial advance infrastructure such as power & water utilities, schools, grade separated junction on the A1;
- Clarification of the extent of economically viable mineral extraction and its impact on a development proposal.
- Detailed transport Assessment and engagement with both the Local and Strategic Highway Authorities to ensure appropriate mitigation measure are deliverable; and
- Identification of a development partner to give more certainty.

#### 7.4 Areas of potential conflict with National Policy

- The site is mostly Greenfield.

#### St George's

#### 7.5 Evidence that supports the proposal as a 'justified' and 'effective' option:

- Substantial parts of the site are previously developed land;
- Detailed viability work has sought to assess the costs of key infrastructure and site preparation and development;
- Established development and current use of the site entails immediate access to transport and utilities infrastructure (resulting from previous uses);
- Proximity to an existing settlement (Edith Weston) allows immediate access to services and facilities attached to an existing community (including primary school, public house and shop);
- Public ownership and advanced discussions between partners improves likelihood of deliverability;
- No 'significant' advance transport infrastructure requirements are identified;
- Ability to deliver the quantum of housing and employment development required (subject to viability);
- Provision of a country park, open spaces and green infrastructure as part of the proposals, and;
- The site has recently been supported by Central Government through a successful bid to the Garden Communities programme

#### 7.6 Further evidence would be required to support the proposal as a 'justified' and 'effective' option:

- The site contains designated and non-designated heritage assets. Whilst no objection has been raised in principle by Historic England, a Statement of Common Ground would be required in order to give certainty to an Inspector;

- Part of the site is within a Minerals Protection Area. The extent of economically viable mineral extraction has been addressed and needs to be confirmed in future masterplans. An appropriate policy wording would be required; and
  - The proposal has the potential to harden the built edge with Edith Weston. A Strategic gap is shown in the emerging masterplan but, if the site is chosen, policy wording should give certainty that a strategic gap and appropriate design solution is pursued in this area.
- 7.7 To summarise, although some questions arise about deliverability of the Woolfox proposal in relation to mineral reserves and transport matters, it would be advisable to consider both sites as ‘reasonable options’ that require full assessment through the Local Planning Authority’s evidence gathering, site assessment and Sustainability Appraisal process.
- 7.8 At the time of drafting this report, there are several areas that would not allow a conclusion that Woolfox could be considered a ‘justified’ option without further work. Key areas that require additional work include:
- Transport;
  - Viability;
  - Utilities provision;
  - Social Infrastructure; and
  - A trajectory for development.
- 7.9 It is the opinion of the report’s author that, subject to satisfactory receipt of the additional evidence identified (and assuming that this does not identify significant “show stopper” issues) Rutland County Council would be justified in selecting the site as a preferred option. Some of the more ‘technical’ evidence such as viability, transport and landscape character require independent assessment by suitably qualified and experienced professionals in order to confirm the robustness of the evidence.
- 7.10 In the context of St George’s, no ‘showstopping’ gaps in the evidence base have been identified and Rutland County Council would be justified in selecting the site as a preferred option. Notwithstanding this, some of the technical evidence such as viability, transport and landscape character require independent assessment by suitably qualified and experienced professionals in order to confirm the robustness of the evidence. The author of the report is mindful that early consultation drafts of the Local Plan have promoted St George’s Barracks as a potential New Village. No issues have been identified as part of the assessment of evidence that would suggest that this is not a reasonable approach. The author of this report considers that the LPA could approach an examination with confidence that, subject to independent appraisal of evidence identified above, that the site would be capable of meeting the tests of soundness.
- 7.11 It is important to note that, in accordance with the most up to date NPPF (2019) the preferred site only has to demonstrate that it is **‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’**. This is a lesser test than the 2012 NPPF which required it to be “...the most appropriate strategy”.

- 7.12 In order to give comfort to an appointed Inspector, and in accordance with the NPPF, the Local Planning Authority should pursue Statements of Common Ground with Duty to Cooperate partners on strategic matters. This could include confirmation that the DtC bodies are satisfied with the submitted evidence.
- 7.13 It is anticipated that the Local Planning Authority will develop appropriate policies and an associated Infrastructure Delivery Plan in order to secure the environmental, social and economic benefits and that policies will seek the development of an appropriate masterplan, phasing and delivery plan.
- 7.14 In order to provide flexibility and address concerns about potential non-delivery or under-delivery at the preferred site, a 'plan B' approach contained in the plan might include reference to considering any unsuccessful new settlement option alongside other development options in a triggered review if the Local Plan is not delivering as expected.

Appendix 1: Potential to deliver the outstanding requirement for development - Overall site capacity (Housing & employment)	
Woolfox	St George's
<ul style="list-style-type: none"> <li>The Woolfox site is 486ha gross (252ha net for housing).</li> <li>The evidence for Woolfox delivery is contained in the Sustainability Appraisal (SA) (Development concept). The Woolfox evidence has the capacity to deliver some 2,500 homes (phase 1) and 10,000 homes in total.</li> <li>27 ha employment land B1 (2 ha), B2 (2 ha), B8 (19 ha) and a Trunk Road service area (4ha).</li> <li>The site capacity substantially exceeds the outstanding requirements for employment identified in the emerging Local Plan in the context of completions and commitments.</li> <li>There is considerable capacity for longer terms needs to meet needs beyond the plan period.</li> <li>A net density of 34 dph can be achieved assuming 60% net to gross ratios.</li> </ul>	<ul style="list-style-type: none"> <li>The St George's site is 289ha gross (80ha +developable for housing and commercial uses).</li> <li>St George's evidence contained in the masterplan identifies the capacity to deliver some 2,215 new homes.</li> <li>14 ha of employment land are proposed in the masterplan 9ha (B1, B2 and B8) and 5 hectares (B1 employment space) to be dispersed</li> <li>The site capacity substantially exceeds the outstanding requirements for employment identified in the emerging Local Plan in the context of completions and commitments.</li> <li>A density of some 25 dwellings per hectare (net) is proposed across the site.</li> </ul>
Start date & Trajectory	
<ul style="list-style-type: none"> <li>Evidence provided by the site promoter's viability assessment indicates first completions could be in 2024.</li> <li>The promoters indicate potential delivery of some 2,500 houses up to 2036.</li> <li>C.200 houses per year at peak years.</li> </ul>	<ul style="list-style-type: none"> <li>Evidence provided in the St George's trajectory indicates first completions as early as 2023 / 24.</li> <li>The promoters indicate potential delivery of 2,215 houses up to 2036.</li> <li>C.225 houses per year at peak years.</li> </ul>
Further work	
<ul style="list-style-type: none"> <li>A Detailed trajectory is required identifying realistic lead-in times and delivery rates.</li> </ul>	<ul style="list-style-type: none"> <li>The LPA would need to be certain that the trajectory is realistic and that lead-in times and delivery rates can be achieved.</li> </ul>
Conclusions	
<p>The emerging Local Plan identifies a requirement for some 1,200 dwellings in a new settlement<sup>12</sup> in Rutland County during the plan period (in addition to allocations, completions and commitments at Oakham, Uppingham, Local Service Centres and Other Villages). The emerging strategy considers that the provision of a new settlement is an appropriate way of delivering the outstanding requirements.</p>	

<sup>12</sup> 'Rutland Local Plan Specific Consultation considering the implications of potential development of St. George's within the Local Plan' (July 2018)

The submitted evidence for both Woolfox and St George's indicates sufficient capacity to potentially deliver the outstanding requirements on site. The Woolfox evidence contained in the SA indicates capacity for up to 10,000 dwellings at densities of 20 dwellings per hectare (dph) (gross) and 34dph assuming 60% net to gross ratios. St George's masterplan promotes some 2,215 dwellings at 25 dph (net) during the plan period.

Further information would be required for Woolfox in relation to a more detailed trajectory. This could be remedied.

Notwithstanding the longer lead-in times associated with strategic developments, it is reasonable to assume that both sites would be capable of delivering the identified outstanding requirement of 1,200 houses during the plan period.

The emerging Local Plan identifies a requirement for some 25ha of employment land between 2015 and 2036. The emerging Local Plan identifies sufficient land to meet the outstanding requirements without that identified in the New Settlement options. Notwithstanding this, there are advantages in overprovision in terms of providing flexibility, allowing co-location of homes and jobs and encouraging sustainable travel patterns.

In this respect both sites are 'justified' solutions to meeting outstanding housing and employment needs. The evidence supports St George's Barracks being deliverable and Woolfox is potentially deliverable subject to a realistic trajectory being provided.

Appendix 2 - Viability

Woolfox	St George's
<ul style="list-style-type: none"> <li>• Woolfox site promoters have produced a confidential 'Current Development Appraisal to Summarise Delivery and Viability (March 2019)' report.</li> <li>• The report contains high level assumptions with regard to phasing but limited detailed phasing in the context of viability.</li> <li>• The report predates the Planning Practice Guidance update from May 2019.</li> <li>• The report broadly indicates that the proposal would remain viable with potential developer profit at 13.95%.</li> <li>• The report identifies some significant transport infrastructure requirements associated with development, most notably grade separated junctions on the A1.</li> <li>• A viability report needs to be prepared in greater detail and in a format that will assist an appointed Inspector. This should include all policy and other infrastructure requirements, particularly in light of the potential transport, utilities and social infrastructure costs.</li> <li>• The viability assessment does not address in detail the impact of phasing on viability.</li> <li>• The viability evidence has not been independently assessed.</li> </ul>	<ul style="list-style-type: none"> <li>• Confidential viability work has been carried out for St George's in relation to a bid for 'Housing Infrastructure Fund' and in a 'Viability Report (November 2018)'.</li> <li>• The Viability Report concludes the scheme is viable "... subject to receipt of £30 m of HIF funding".</li> <li>• The report considers viability against different scenarios. The return to developer in the 2018 report is £14m.</li> <li>• The submitted 'Housing Infrastructure Fund' (HIF) bid will, if successful, help to secure early infrastructure and have positive impacts on viability.</li> <li>• A viability report needs to be prepared in greater detail and in a format that will assist an appointed Inspector. This should include all policy and other infrastructure requirements, particularly in light of the potential demolition and remediation costs associated with the former use.</li> <li>• The report predates the Planning Practice Guidance update from May 2019.</li> <li>• The viability evidence has not been independently assessed.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• An <u>independent</u> assessment of viability is required to ensure that the site could be developed and all associated infrastructure provided without undermining viability.</li> <li>• The assessment should be consistent with the updated guidance in the PPG.</li> </ul>	<ul style="list-style-type: none"> <li>• An <u>independent</u> assessment of viability is required to ensure that the site could be developed and all associated infrastructure provided without undermining viability.</li> <li>• The assessment should be consistent with the updated guidance in the PPG.</li> </ul>
<b>Conclusions</b>	
<p>The National Planning Policy Framework and revised Planning Practice Guidance (May 2019) (PPG) places increased emphasis on viability evidence at the plan making stage. The PPG notes that "It is important to consider the specific circumstances of strategic sites".</p>	

High level viability assessment work has been carried out for Woolfox with more detailed work for St George's. Further work is required in order to demonstrate the deliverability of the sites to appointed Inspector. The report should address: all essential infrastructure including transport and social infrastructure; associated development costs (demolition and decontamination), and; policy requirements.

The Woolfox 'Current Development Appraisal' is a high level appraisal of potential viability. The return to developer (13.95%) is low when compared with the benchmark of 15 to 20%<sup>13</sup>. Further exploration is required in relation to the development costs of the substantial 'advance' and 'early stage' infrastructure. Most notably the provision of a grade separated junction on the A1, early provision of schools and relocating & provision of new utilities infrastructure. This will necessitate financial 'front' loading which places additional pressure on early stage viability. The evidence required has the opportunity of being provided but this has not been fully addressed at the time of drafting this report. It is not possible to conclusively state that the Woolfox scheme would be viable at this time.

The St George's proposal is accompanied by a more detailed viability assessment report prepared largely in relation to a Housing Infrastructure Fund (HIF) bid. However, this is not a structured site specific viability assessment that is anticipated in the Planning Practice Guidance and which would normally accompany a Local Plan submission. There are potential advance and early stage costs including substantial demolition and decontamination work that could have implications for 'early stage' viability. This needs to be independently assessed. The return to developer is stated as 15% but needs to be made clear, this is capable of being remedied. Without HIF funding the evidence indicates that there are viability issues.

Both sites will need to be assessed as part of a whole plan viability assessment but also an independent assessment of the specific sites. The viability assessments should be in accordance with the recent changes to 'Planning Practice Guidance' which emphasis the role of Local Plans in assessing viability and using standardised inputs to viability assessment. The Planning Practice Guidance is clear that LPAs should "engage with landowners, site promoters and developers" to "...ensure assumptions of costs and values are realistic and broadly accurate".

In summary, further independent viability work is required to assess the merits of each site. The independent assessment of St George's should consider viability with and without a successful 'Housing Infrastructure Fund' (HIF) bid.

Without additional independent site specific assessment of viability, it is not possible to confirm whether either site is 'justified' (in terms of the evidence underpinning it) or 'effective' in terms of the ability to deliver the development and associated infrastructure. This could be remedied for both sites through an independent assessment of the specific sites.

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<sup>13</sup> Consistent with Planning Practice Guidance



Appendix 3 - Ownership constraints	
Woolfox	St George's
<ul style="list-style-type: none"> <li>Woolfox site promoters have submitted a 'Land ownership position statement' confirming that the site is in a single family ownership (and family company) and willingness of the owners to develop the site.</li> <li>The submitted statement indicates that no third party land is required in order to deliver the development.</li> <li>Off-site works would be required on land in the control of the Local Highway Authority and Highways England.</li> </ul>	<ul style="list-style-type: none"> <li>The site is owned by the Ministry of Defence (MOD). Confirmation is contained within a Memorandum of understanding between the MOD and Rutland County Council. Published – St George's website</li> <li>Confirmation of ownership forms part of a Housing Infrastructure Fund (HIF) submission.</li> <li>Off-site works would be required on land assumed to be in the control of the Local Highway Authority. The Local Highway Authority have confirmed this.</li> <li>Small scale land ownerships and interests are identified on the peripheries, but outwith, the main site. This does not appear to have any adverse impact on deliverability.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>None identified</li> </ul>	<ul style="list-style-type: none"> <li>None identified</li> </ul>
<b>Identified developer partner</b>	
<ul style="list-style-type: none"> <li>No developer identified at this stage.</li> </ul>	<ul style="list-style-type: none"> <li>No developer identified at this stage.</li> <li>The site promoters (DIO) have submitted information on the business model used in the disposal and delivery of land.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>None identified</li> </ul>	<ul style="list-style-type: none"> <li>None identified</li> </ul>
<b>Conclusions</b>	
<p>Both sites are under the substantial control of a single landowner who is a willing promoter of development and who have indicated a desire to deliver a New Settlement. No developer partners have been identified at this time. The St George's promoters have submitted information on the business model used in the disposal and delivery of land.</p> <p>No evidence has been identified that would suggest either of the sites could not be 'justified' or 'effective' as potentially suitable options in the context of landowners who are willing to see the site delivered and the ability to attract developer partners.</p> <p>Off-site works will be required on land in the control of the Local Highway Authority (and Highways England in the case of Woolfox).</p>	



Appendix 4 - Legal constraints	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• No legal constraints have been identified.</li> <li>• It has been assumed that promotion of the site is in the knowledge that the site is free from legal constraints.</li> <li>• The MOD have confirmed that there are no Crichel Down legacy issues.</li> </ul>	<ul style="list-style-type: none"> <li>• No legal constraints have been identified.</li> <li>• It has been assumed that promotion of the site is in the knowledge that the site is free from legal constraints.</li> <li>• The MOD have confirmed that there are no Crichel Down legacy issues.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Site promoters should be asked if they are aware of any legal constraints that would have an impact on the ability to deliver the proposed development.</li> </ul>	<ul style="list-style-type: none"> <li>• Site promoters should be asked if they are aware of any legal constraints that would have an impact on the ability to deliver the proposed development.</li> </ul>
<b>Conclusions</b>	
<p>In the absence of any identified legal constraints and in the context that the sites have willing promoters it has been assumed that both sites would be 'justified' and 'effective' options in that they could be 'delivered'.</p> <p>Further work will be required in order to confirm that there are no insurmountable covenants or other constraints that would inhibit development.</p>	

Appendix 5 - Flooding

Woolfox	St George's
<ul style="list-style-type: none"> <li>• An 'Initial assessment of flood risk' has been carried out by RPS consultants on behalf of the site promoters.</li> <li>• The report is a brief, high level, desk-based assessment using LIDAR data to identify topography and the EA Flood Map to identify which parts of the site have a low, medium or high probability of river flooding or fall within the functional floodplain.</li> <li>• The submitted report indicates that the vast majority of the site falls within flood zone 1 where there is a low probability of river flooding.</li> <li>• The initial report findings are consistent with the Strategic Flood Risk Assessment (SFRA) carried out by ENTEC in 2009 (in so far as only part of the site is covered in the ENTEC report).</li> <li>• The report indicates low risk from groundwater flooding and very low risk of surface water flooding. In this context the evidence is proportionate.</li> <li>• The EA flood risk maps show some low and medium potential for surface water flooding on parts of the site. Given the overall scale of the site, this should be capable of being satisfactorily mitigated. Notwithstanding this, surface water flooding would need to be considered in any detailed design.</li> <li>• The potential for surface water flooding would need to be considered at planning application stage if the site were considered acceptable in principle.</li> <li>• At the time of drafting this report no comments had been received from the Environment Agency concerning potential flooding issues at Woolfox.</li> </ul>	<ul style="list-style-type: none"> <li>• The area has been considered as part of the Council's Strategic Flood Risk Assessment carried out by ENTEC in 2009.</li> <li>• The flood zone maps in the SFRA indicate that no part of the site falls within flood zones 2 or 3.</li> <li>• The EA flood risk maps show some low and medium potential for surface water flooding on parts of the site. Given the overall scale of the site, this should be capable of being satisfactorily mitigated. Notwithstanding this, surface water flooding would need to be considered in any detailed design.</li> <li>• The previous SFRA and EA flood maps indicate that no substantial potential for flood risk has been identified.</li> <li>• The Environment Agency have been consulted in relation to potential issues associated with growth. The EA have raised no concerns in relation to flooding.</li> <li>• The EA have confirmed that the potential impacts on water quality need to be thoroughly assessed including any contamination on site and impacts on water courses and groundwater and drainage impacts on Rutland water. The capacity of water treatment works needs to be determined.</li> <li>• Further detailed work is required in relation to the potential for sustainable drainage systems.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• The LPA should seek the opinion of the Environment Agency with regard to the site if it is considered a preferred option.</li> </ul>	<ul style="list-style-type: none"> <li>• The LPA should pursue further engagement with the Environment</li> </ul>

<ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should require more detailed assessment of surface water flooding and its potential impact on the masterplan and mitigation measures.</li> <li>• Potential impacts on water quality need to be thoroughly assessed including any contamination if a preferred site.</li> <li>• A Flood Risk Assessment would be required if the site were allocated and a planning application pursued.</li> </ul>	<p>Agency if the site is considered a preferred option.</p> <ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should require more detailed assessment of surface water flooding and its potential impact on the masterplan and mitigation measures.</li> <li>• Potential impacts on water quality need to be thoroughly assessed including any contamination if a preferred site.</li> <li>• A Flood Risk Assessment would be required if the site were allocated and a planning application pursued.</li> </ul>
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**Conclusions**

The potential for flooding has been assessed at a high level. The SFRA for Rutland County considers the St George’s site in its entirety and the Woolfox site partially. Evidence within the SFRA identifies that the vast majority of both sites are within flood zone 1 and that both have small parts of the site that have the potential to be affected by surface water flooding. This is confirmed by cross reference to the Environment Agency’s Flood Risk maps.

The evidence broadly supports both sites as ‘justified’ alternative options for new settlements in the context of flooding.

Further discussions are required with the EA to ensure that they are satisfied that the Woolfox site has no flooding and drainage issues. The detailed views of the Environment Agency should be sought in relation to policy requirements once the LPA has determined its preferred option.

If either site is proposed as a preferred option, any policy related to the site’s development would benefit from a criterion that seeks to mitigate any surface water issues.

Appendix 6 - Landscape

Woolfox	St George's
<ul style="list-style-type: none"> <li>• A 'Landscape and Visual Impact Assessment' (March 2019) has been carried out by Pegasus Group consultants on behalf of the site promoters.</li> <li>• The report has been prepared in the context of best practice issued by the 'Landscape Institute' / 'Institute of Environmental Management and Assessment' and 'Natural England'.</li> <li>• The assessment is consistent with the Planning Practice Guidance insofar as it relates to 'Landscape'. The report includes an assessment of topographic features, some flora and fauna (most notably trees and woodland) and land use.</li> <li>• The report explains the sites context in terms of landscape character, designations and visual receptors.</li> <li>• The report contains substantial evidence in relation to the baseline position including photographic evidence of short and longer distance views.</li> <li>• The report has a comprehensive analysis of 'landscape elements', 'character designations' and visual amenity, including the 'sensitivity, magnitude and effect' from a range of viewpoints.</li> <li>• The report contains a comparison with St George's barracks site in the context of landscape.</li> <li>• The report concludes that the proposed Woolfox Garden village could be designed to respect the character and visual amenity of the site and its surroundings.</li> </ul>	<ul style="list-style-type: none"> <li>• A 'Landscape Visual Appraisal' has been carried out by Fabrik Chartered Landscape Architects on behalf of the site promoters.</li> <li>• The report is consistent with the methodology published by the Landscape Institute and Institute of Environmental Management &amp; Assessment (2013).</li> <li>• The assessment is consistent with the Planning Practice Guidance insofar as it relates to 'Landscape'. The report includes an assessment of topographic features and land use.</li> <li>• The report explains the sites context in terms of landscape character, designations and landscape receptors.</li> <li>• The report contains a visual assessment of the current site including substantial photographic evidence of short, medium and longer distance views.</li> <li>• The report makes an assessment of the landscape and visual effects of development. It considers the impact and magnitude of landscape and visual effects.</li> <li>• The report analysis identifies opportunities and constraints in relation to potential development of the site. It acknowledges that there will be visual and landscape impacts arising from development as a result of its 'elevated plateau location'.</li> <li>• The report indicates that mitigation measures such as reduced building heights, lower densities, high quality design and retention / supplementing landscaping would potentially reduce impacts.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should include a criterion to ensure that the masterplan incorporates</li> </ul>	<ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should include a criterion to ensure that the masterplan incorporates</li> </ul>

<p>measures to mitigate any adverse landscape impacts.</p> <ul style="list-style-type: none"> <li>• Landscape implications will need to be considered as part of the Sustainability Appraisal.</li> </ul>	<p>measures to mitigate any adverse landscape impacts.</p> <ul style="list-style-type: none"> <li>• Landscape implications will need to be considered as part of the Sustainability Appraisal.</li> </ul>
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**Conclusions**

A ‘Landscape and Visual Impact Assessment’ has been submitted by the Woolfox promoters and a ‘Landscape Visual Appraisal’ has been submitted by the promoters of ‘St Georges’.

Both submissions appear to satisfactorily address the baseline circumstances and potential impacts of development. Both approaches are consistent with the methodology promoted by the ‘Landscape Institute’ and ‘Institute of Environmental Management & Assessment’ and are broadly consistent with the approach promoted in the National Planning Practice Guidance and Natural England’s publication ‘An Approach to Landscape Character Assessment (October 2014)’.

The evidence submitted for both sites suggests that both sites could accommodate growth without unacceptable adverse impacts on landscape. However, a thorough assessment by a professionally qualified person should be pursued in order to confirm this.

Both sites will require some level of mitigation to soften the inevitable impacts of such large-scale growth. The elevated position of St George’s has the potential for impacts that require mitigation and the northern section of the Woolfox site is exposed from public areas.

If either site are promoted as potential allocations for new settlements a policy criterion should be attached that seeks to ensure that development responds to: important landscape features and topography, long distance views, important natural and man-made features (such as woodland, trees, scrub, ponds and hedgerows) and that a detailed masterplan should be prepared and agreed as part of submission of a planning application. The masterplan should set out in detail the proposed distribution and location of land uses and mitigation required to protect the important environmental features identified including landscape.

Both sites appear to be potentially ‘justified’ in the context of landscape evidence. However, a professional independent analysis of the submitted evidence and assessment of the landscape impacts by a suitably qualified and experienced person is recommended to be certain that the sites are justified.

Appendix 7 - Ecology (habitats and species)

Woolfox	St George's
<ul style="list-style-type: none"> <li>• A 'Preliminary Ecological Assessment' (March 2019) has been carried out by Wharton consultants on behalf of the site agents.</li> <li>• The report was prepared in the context of the 'Chartered Institute of Ecology and Environmental Management' guidance on Preliminary Ecological Appraisals.</li> <li>• The report seeks to identify: the likely ecological constraints associated with the project; any mitigation measures required; any additional surveys that may be required; and, opportunities to deliver ecological enhancements.</li> <li>• The report summarises the legislative and policy context.</li> <li>• The methodology involved both desk-based and field survey and an extended phase 1 habitat survey was carried out. The phase 1 habitat survey sought to identify the presence of protected species and a bat roost assessment.</li> <li>• A 'detailed botanical assessment' was not carried out.</li> <li>• The report acknowledges that some survey work was carried out at a sub-optimal time.</li> <li>• The survey considers the impacts on nearby statutory wildlife sites.</li> <li>• The report summary indicates that there is the presence of a wide variety of habitats, some potentially important. The report suggests that the size of the site and early stage of development gives scope to create, retain and enhance habitats.</li> <li>• Desk study historic data was referenced which identified the potential for the presence of protected species.</li> <li>• The report suggests additional survey work is required.</li> </ul>	<ul style="list-style-type: none"> <li>• An 'Ecological Appraisal' has been carried out by Derek Finnie Associates on behalf of the site promoters.</li> <li>• The report summarises the legislative and policy context.</li> <li>• The survey was undertaken in line with guidance from the Chartered Institute of Ecology and Environmental Management (CIEEM) and BS 42020: 2013 Biodiversity – Code of Practice for Planning and Development.</li> <li>• The methodology involved both a desk study and extended phase 1 habitat survey. The phase 1 habitat survey sought to identify the presence of protected species and a bat roost assessment.</li> <li>• The report sets out an 'Ecological Zone of Influence' and identifies survey constraints -</li> <li>• The survey considers the impacts on nearby statutory wildlife sites, including Rutland Water (SPA, SSSI &amp; RAMSAR site). The potential impact on non-statutory sites was also considered.</li> <li>• The report identifies the presence of a wide variety of habitats.</li> <li>• The desk study and field study indicated the potential for a wide range of protected fauna.</li> <li>• The report identifies three distinct areas. The Barracks and Officers' Mess were assessed as being of limited ecological value, North Luffenham Golf Course has the potential to support important habitats and species; and, North Luffenham Airfield is a Local Wildlife site comprising moderately species rich calcareous and mesotrophic grassland and important for breeding and passage birds.</li> <li>• Some of the initial survey work was carried out at a sub-optimal time. The initial report suggests additional survey work would be required, this has subsequently been supplemented by 'winter bird surveys' and ongoing surveys.</li> </ul>



<b>Further work</b>	
<ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should include a criterion to ensure that important ecological areas are protected and mitigated.</li> <li>• Ecological and bio-diversity implications will need to be considered as part of the Sustainability Appraisal and Habitat Regulation Assessment.</li> <li>• The views of Natural England should be sought.</li> <li>• The views of the Leicestershire &amp; Rutland Wildlife Trust should be sought.</li> <li>• Development proposals and masterplans and scheme development needs to consider the potential for ‘avoidance’, ‘mitigation’ and/or ‘compensation’.</li> <li>• A Statement of Common Ground with Natural England is recommended.</li> </ul>	<ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should include a criterion to ensure that important ecological areas are protected and mitigated.</li> <li>• Ecological and bio-diversity implications will need to be considered as part of the Sustainability Appraisal and Habitat Regulation Assessment.</li> <li>• The views of the Leicestershire &amp; Rutland Wildlife Trust should be sought.</li> <li>• Development proposals and masterplans and scheme development needs to consider the potential for ‘avoidance’, ‘mitigation’ and/or ‘compensation’.</li> <li>• A Statement of Common Ground with Natural England is recommended.</li> </ul>
<b>Conclusions</b>	
<p>The potential impacts on ecology and bio-diversity have been assessed through ‘Extended phase 1 habitat surveys’ for both sites. The available evidence identifies that there will be potential impacts for habitats and species for both sites but broadly that mitigation measures can be implemented to ensure that important bio-diversity is protected.</p> <p>At the time of drafting this report the views of Natural England had been sought in relation to the St George’s site, and no objection in principle had been identified subject to additional information being provided in relation to key issues such as the treatment of foul water, impacts on water table and recreational impacts.</p> <p>The evidence broadly indicates that both sites have the potential to mitigate adverse ecological impacts and that net bio-diversity gains are possible within the substantial site areas. In the context of ecology no evidence has been identified to suggest ‘show-stopping’ constraints and both sites could be considered as ‘justified’ alternative options for new settlements.</p> <p>Further discussions are required with Natural England to ensure that they are satisfied that the Woolfox site has no show-stopping adverse impacts on designations, habitats and species. The detailed views of Natural England should be sought in relation to policy requirements once the LPA has determined its preferred option. RCC should establish whether a ‘Statement of Common Ground’ is required to confirm their position.</p> <p>If either site is proposed as a preferred option, any policy related to the site’s development would benefit from a criterion that seeks to mitigate and enhance bio-diversity.</p>	

Appendix 8 - National and Internationally designated sites

Woolfox	St George's
<ul style="list-style-type: none"> <li>• There are multiple sites that are statutorily designated for their bio-diversity value in close proximity to the proposed new settlement.</li> <li>• The 'Preliminary Ecological Assessment' (March 2019) considers the potential impact of the proposal on 28 statutory wildlife sites within 10km of the proposed new settlement.</li> <li>• The report considers 22 Sites of Special Scientific Interest (SSSI), one local nature reserve, one SSSI/NNR (National Nature Reserve), one Special Area of Conservation (SAC) and one RAMSAR/SSSI, Special Protection Area (SPA).</li> <li>• The development falls within 'Impact Risk Zones' for two of the SSSIs.</li> <li>• Measures are proposed to mitigate the potential impacts of development on designated sites.</li> <li>• The report suggests additional survey work.</li> <li>• Consultation with Natural England is required in order to confirm no objection in principle to the proposed development.</li> <li>• Non-statutory wildlife sites are also considered.</li> </ul>	<ul style="list-style-type: none"> <li>• There are multiple sites that are statutorily designated for their bio-diversity value in close proximity to the proposed new settlement.</li> <li>• The 'Ecological Appraisal' considers the potential impact of the proposal on 6 statutory wildlife sites within 5km of the proposed new settlement.</li> <li>• The report considers 6 Sites of Special Scientific Interest (SSSI). The sites identified (other than Rutland Water) within 2km of the Site are considered<sup>14</sup> by the to be outside the Ecological Zone of Influence of any redevelopment, hence are not considered further</li> <li>• The report primarily focuses on Rutland Water Special Protection Area / RAMSAR site which is only some 450m from the edge of the site.</li> <li>• Measures are proposed to mitigate the potential impacts of development on Rutland water.</li> <li>• The report suggests additional survey work.</li> <li>• Consultation with Natural England has been undertaken and further engagement would be required if the site were considered a suitable option for a new settlement.</li> <li>• Non-statutory wildlife sites are also identified.</li> <li>• There are potential impacts resulting from recreational disturbance due to an increase in the number of residents in the local area.</li> <li>• Meetings have been held with Natural England. No 'in principle' objections have been raised.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should include a criteria to ensure</li> </ul>	<ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should include a criteria to ensure</li> </ul>

<sup>14</sup> In the Ecological Appraisal report (2018) produced by Derek Finnie Associates.

<p>that impacts on statutorily designated sites are considered.</p> <ul style="list-style-type: none"> <li>• Impacts on designated sites will need to be considered as part of the Sustainability Appraisal and Habitat Regulation Assessment.</li> <li>• The views of Natural England should be sought.</li> <li>• Development proposals and masterplans and scheme development needs to consider the potential for ‘avoidance’, ‘mitigation’ and/or ‘compensation’.</li> </ul>	<p>that impacts on statutorily designated sites are considered.</p> <ul style="list-style-type: none"> <li>• Impacts on designated sites will need to be considered as part of the Sustainability Appraisal and Habitat Regulation Assessment.</li> <li>• The views of Natural England should be sought.</li> <li>• Development proposals and masterplans and scheme development needs to consider the potential for ‘avoidance’, ‘mitigation’ and/or ‘compensation’.</li> </ul>
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**Conclusions**

The potential impacts on designated sites is contained within Ecological Appraisals for both sites.

At the time of drafting this report early opinions had been sought from Natural England in relation to the St George’s site. The formal opinion of Natural England will also be required in relation to Woolfox.

Owing to its geographical proximity to Rutland Water, there is potential for indirect impacts arising from development at St George’s. Both developments have the potential to increase ‘visitor pressure’ on Rutland Water with associated impacts and implications. Ongoing engagement and consultation with Natural England on both sites is essential to ensure that they have no objection in principle.

The formal opinion of Natural England is critical in determining if either site could be considered as ‘justified’ alternative options for new settlements. A Statement of Common Ground with Natural England is recommended.

Appendix 9 - Minerals

Woolfox	St George's
<ul style="list-style-type: none"> <li>• The Woolfox site is within a 'Mineral Consultation Zone' (MPZ).</li> <li>• A Mineral Position Statement has been prepared by Pegasus Group.</li> <li>• The Position Statement is a desk based assessment that uses various sources to establish the presence of economically workable mineral resources from the site.</li> <li>• Discussions have been held between the site promoters and Officers of Northamptonshire County Council (acting on behalf of Rutland County Council as Minerals Planning Authority).</li> <li>• Initial assessment identifies some areas of potentially economic and workable areas of mineral extraction in the vicinity of Clipsham quarry.</li> <li>• The submitted Mineral Position Statement acknowledges that further evidence gathering is required in order to fully understand the potential for mineral reserves.</li> <li>• The proposed development area is substantial in size and there appears to be the potential to deliver the development requirements and exclude any areas of potential mineral extraction.</li> <li>• There are sufficient permitted crushed rock reserves in Rutland to meet the identified need during the plan period.</li> </ul>	<ul style="list-style-type: none"> <li>• The St George's site is within a 'Mineral Consultation Zone' (MPZ).</li> <li>• A Mineral Site Investigation Report has been prepared by Evolution Geological.</li> <li>• The Mineral Site Investigation Report includes a 'desk based' assessment to identify potential resources and borehole assessment where 10 boreholes were drilled and assessed to understand the presence of mineral resources.</li> <li>• Borehole testing and chemical analysis has identified the presence of economically workable mineral resources on the site.</li> <li>• Potential future limestone resource have been identified in the order of 20 Million tonnes (conservative figure).</li> <li>• The proposed development area is substantial in size and there appears to be the potential to deliver the development requirements and exclude any areas of potential mineral extraction. This is reflected in the masterplan.</li> <li>• The draft masterplan identifies the area safeguarded for mineral extraction. This is outside of the area identified for built development including proposed housing and employment. It would infringe on the proposed Country Park. A buffer is proposed between the proposed housing and mineral extraction area.</li> <li>• Some potentially viable mineral reserves would have an impact on the heritage assets associated with the listed building on-site.</li> <li>• Agents for the Mineral Planning Authority have assessed the evidence and not raised any 'in-principle' objection.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Borehole testing would be required in order to understand the potential for economically workable minerals within</li> </ul>	<ul style="list-style-type: none"> <li>• Any amendments to the masterplan will require the formal views of the Mineral Planning Authority (through their agents).</li> </ul>

<p>the MPZ, their extent and the potential implications for an emerging masterplan.</p> <ul style="list-style-type: none"> <li>• The formal views of the Mineral Planning Authority (through their agents) will be required.</li> <li>• Development proposals, masterplans and scheme development needs to consider the potential to safeguard economically workable minerals.</li> </ul>	<ul style="list-style-type: none"> <li>• Development proposals, masterplans and scheme development needs to consider the potential to safeguard economically workable minerals.</li> </ul>
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**Conclusions**

Evidence considering the potential impacts on economically workable minerals has been submitted for both sites.

Both sites are within a Mineral Protection Zone with the potential for economically viable extraction.

The sites are both substantial and could have the potential to deliver the outstanding requirements for development whilst retaining the ability to extract mineral deposits. If either site is proposed as a preferred option, masterplans will need to identify the areas that are to be safeguarded for mineral extraction any policy related to the site’s development would benefit from a criterion that requires a detailed appraisal of the potential for economically viable mineral reserves and safeguarding of these areas in subsequent masterplans.

Woolfox evidence is predicated on desk-based research. The site has the potential to be impacted by mineral extraction from extensions to Clipsham Quarry. St George’s site has the potential to be impacted by Mineral extraction from extensions to Hanson’s Ketton quarry and cement works. In the absence of additional work from the Woolfox site to understand the potential extent and quantity of economically viable extraction at this stage it is not possible to state with any certainty whether this site would be ‘justified’ and ‘effective’. RCC should seek further information from the Woolfox promoters to expand on the ‘Minerals Position Statement’. Further work is required in in order to understand the extent of economically viable mineral reserves and their geographical distribution within the site.

The St George’s site is accompanied by a desk based assessment, borehole testing and chemical analysis. The agents of the Mineral Planning Authority have assessed the evidence provided and have not identified any objection in principle. The full extent of the area that would be protected should be shown in any future masterplans.

The agents for the Minerals Planning Authority (Northamptonshire County Council) should confirm whether the proposals for both sites are acceptable in terms of their potential to sterilize potential mineral reserves.

Appendix 10 - Trees and Woodlands

Woolfox	St George's
<ul style="list-style-type: none"> <li>• Large parts of the site are covered by groups of trees and individual specimens.</li> <li>• An Arboriculture Planning Statement' (March 2019) is based on a survey of 116 individual tree, 101 groups of trees, 28 hedgerows and 10 woodlands. The report identifies 5 ancient and semi-natural woodlands.</li> <li>• The report seeks to assess the High, Medium and low retention values of trees and groups of trees based on three distinct tranches of the site.</li> <li>• There is a comprehensive assessment of groups of trees and individual specimens.</li> <li>• There are substantial woodland areas and individual specimens that possess 'high retention values'.</li> <li>• The report concludes that the majority of trees are located at the site boundaries and that "there is scope within future development of the concept masterplan to retain any trees of high value".</li> <li>• There is potential for multiple tree losses as a result of development. However, owing to the early stage of development of the masterplan no certainty can be attached to this.</li> <li>• The report suggests a commitment to additional tree planting.</li> </ul>	<ul style="list-style-type: none"> <li>• There are groups of trees associated with the golf course and individual specimens within the site.</li> <li>• The 'draft masterplan' contains a section on arboriculture.</li> <li>• The masterplan indicates that apart from two spinneys, there are few groups of trees.</li> <li>• The masterplan indicates that tree species and tree cover reflect distinct areas formed by the barracks, golf course, airfield and scattered woodland.</li> <li>• There is no detailed assessment of the health / retention values of trees and woodlands on site.</li> <li>• The report suggests that the masterplan should retain any existing trees within the site. The report defers detailed assessment to a planning application stage.</li> <li>• The proposal includes substantial new woodland planting.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should include a criteria to ensure that impacts on trees and woodlands are considered.</li> <li>• Development proposals and masterplans and scheme development needs to consider the potential impact on trees and woodlands.</li> </ul>	<ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should include a criteria to ensure that impacts on trees and woodlands are considered.</li> <li>• If the site is a preferred option, a detailed arboriculture report would be required to accompany any planning application showing in detail which trees are to be retained and those to be removed.</li> </ul>
<b>Conclusions</b>	

The potential impacts on trees and woodlands have been submitted for both sites. The depth of evidence submitted for Woolfox is greater, this is essentially as a result of the substantial difference in the presence of trees on site.

The available evidence in the St George's masterplan is proportionate given the limited tree and woodland cover.

Given the early stage of masterplan preparations, and the substantial scale of the proposal, detailed development proposals could allow high value trees and woodlands to be accommodated within future developments.

Based on the submitted evidence, no show-stopping tree / woodland constraints have been identified and both sites would be 'justified' allocations in the context of their impacts.

Appendix 11 - Air quality, noise and other pollutants

Woolfox	St George's
<ul style="list-style-type: none"> <li>• Technical notes on 'Air Quality' and 'Noise &amp; Vibration' have been provided (March 2019) by M.EC consultants and 24 Acoustics.</li> <li>• The Air Quality report acknowledges that the absence of transport distribution work does not allow a full assessment of the impact of development traffic.</li> <li>• The technical note does provide information on baseline conditions and in particular the air quality implications resulting from proximity to the A1.</li> <li>• There are no Air Quality Management Areas within or adjacent to the site.</li> <li>• The site is of such substantial scale that it could accommodate development whilst maintaining sufficient distance separation from the A1.</li> <li>• A detailed Air Quality Assessment would assess Nitrous Oxides and particulate matter concentrations should the site be pursued.</li> <li>• There is potential for future mineral extraction that could have additional impacts on the proposed site.</li> </ul>	<ul style="list-style-type: none"> <li>• No detailed assessment of air quality, noise, vibrations, and other pollutants has been undertaken.</li> <li>• The absence of major transport links results in less potential for noise and air quality impacts.</li> <li>• No other substantial noise / air quality generators identified.</li> <li>• The potential for future mineral extraction has been considered as has the noise impacts arising from the extraction operations.</li> <li>• The proximity to existing and future areas of mineral extraction suggest that impacts could be mitigated.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• If the site is a preferred option then the policy should include a criteria to ensure that impacts of air quality are considered and masterplans and scheme development needs to consider the potential impact on air quality, noise, vibrations and other pollutants.</li> <li>• The potential for future mineral extraction needs to be assessed</li> </ul>	<ul style="list-style-type: none"> <li>• The impact of future mineral extraction on the proposed residential areas needs to be considered further.</li> <li>• If the site is a preferred option then the policy should include a criteria to ensure that impacts of air quality are considered and masterplans and scheme development needs to consider the potential impact on air quality, noise, vibrations and other pollutants.</li> </ul>
<b>Conclusions</b>	
<p>High level evidence relating to air quality, noise, vibration and other pollutants has been submitted for Woolfox. No detailed evidence has been submitted in relation to the St George's site. There are no significant transport polluters adjacent to St George's.</p>	



The scale of the development sites are substantial with substantial scope for mitigation measures and distance separation from potential noise and pollution generators. It is likely that development could be accommodated without significant adverse impacts from existing noise and pollution sources.

Both sites have the potential for noise and disturbance associated with future mineral extraction within and adjacent the proposed development areas. The potential impacts of extraction (in terms of noise, vibration, dust and other pollutants) will need to be carefully assessed and independently scrutinised.

Given the scale of sites and based on the available evidence both sites are likely to be 'justified' options for New Settlements.

Appendix 12 - Land stability and contamination

Woolfox	St George's
<ul style="list-style-type: none"> <li>• A 'Geo-environmental desk study' (March 2019) has been carried out by M.EC consulting development engineers.</li> <li>• The report seeks to assess the geo-technical and environmental risks within the site and off site (that could influence development on-site).</li> <li>• The report concludes that there are potential pockets of 'contamination' and 'made ground' within and adjacent the site.</li> <li>• There is potential for migrating radon gas and other contamination.</li> <li>• There is potential for contaminants, made-ground and buried structures arising from the previous use of the site as an airfield.</li> <li>• Mitigation measures, including foundation design and earthwork re-modelling of site contours to provide a suitable development platform are likely to be required.</li> <li>• Further detailed site investigation work will be required.</li> </ul>	<ul style="list-style-type: none"> <li>• A 'Ground conditions technical note' has been undertaken by 'Campbell Reith' which considers the implications for land stability and contamination. The report is 'desk-based' and uses a range of data.</li> <li>• The report seeks to assess the ground condition constraints within and adjacent to the site (that could influence development).</li> <li>• The report summarises previous assessments that identify the potential for potential contaminants including pH, heavy metals, non-metals and radon.</li> <li>• In addition, the site is likely to contain made-ground and buried waste and structures arising from the previous use of the site as an airfield.</li> <li>• There is an historic landfill adjacent to the site.</li> <li>• The masterplan identifies several areas of potential instability and contamination (pp27)</li> <li>• Further detailed site investigation work will be required.</li> <li>• The costs of remediation are identified in the 2018 viability assessment and 'Demolition &amp; Remediation' report.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• If the site is a preferred option, detailed ground investigation will be required. Any policy should require this in advance of development commencing.</li> <li>• The impacts of decontamination and remediation should be costed and considered in independent viability assessment.</li> </ul>	<ul style="list-style-type: none"> <li>• If the site is a preferred option, detailed ground investigation will be required. Any policy should require this in advance of development commencing.</li> <li>• The impacts of decontamination and remediation should be considered in the independent viability assessment.</li> </ul>
<b>Conclusions</b>	
<p>High level evidence has been submitted for both sites relating to Land stability and contamination.</p> <p>Mitigation measures are likely to be required for both sites if they are chosen as a preferred option. The scale of the development sites are sizable. Based on the available evidence, there appears to be</p>	

substantial scope for any adverse ground conditions to be mitigated or avoided as part of the development and that the required levels of growth could be accommodated without significant adverse impacts.

Based on the evidence submitted, and the potential for mitigation measures, both sites appear to be 'potentially justified' allocations in the context of Land stability and contamination. Further detailed site investigation would be required for either site, this should be a requirement of any emerging policy if the sites are identified as allocations. The potential impacts of adverse ground conditions (in terms of stability and contamination) will need to be independently scrutinised.

The impacts of decontamination and remediation on viability should be independently considered for both sites. St George's viability evidence indicates that site remediation is some £16.7m. No specific costed figure is included in the Woolfox viability evidence.

Appendix 13 - Topography

Woolfox	St George's
<ul style="list-style-type: none"> <li>• Evidence submitted in the landscape assessment includes a topography plan.</li> <li>• The majority of the phase 1 area to the centre and south of the site is gently sloping. The northern extremity of the site slopes more steeply towards a watercourse but is largely outside of the area proposed for development in the masterplan.</li> <li>• A high quality design and masterplan could be developed which would respond to the site contours.</li> <li>• No topography constraints have been identified.</li> </ul>	<ul style="list-style-type: none"> <li>• The submitted masterplan includes a topography plan.</li> <li>• The majority of the site proposed for residential or employment development is on a broadly flat plateau. The area proposed as a country park (and potential area for mineral extraction) is gently sloping.</li> <li>• A high quality design and masterplan could be developed which would respond to the site contours.</li> <li>• No topography constraints have been identified.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• None identified.</li> </ul>	<ul style="list-style-type: none"> <li>• None identified.</li> </ul>
<b>Conclusions</b>	
<p>Submitted evidence indicates that both sites appear largely unconstrained in terms of their topography.</p> <p>Given the scale of the sites and the potential for a design that responds to site contours, both sites appear to be potentially 'justified' and 'effective' allocations in the context of topography.</p>	

Appendix 14 - Heritage (Designated and non-designated heritage assets and their settings)	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• Woolfox site promoters commissioned a 'Heritage Appraisal' in order to identify whether there are heritage issues that could constrain development (produced by Pegasus Group).</li> <li>• The assessment is consistent with Historic England's 'Good Practice Advice' and other guidance.</li> <li>• The report considers above ground heritage assets and conducts a desk-based assessment of archaeological assets using previous studies.</li> <li>• The Appraisal considers both designated and non-designated heritage assets.</li> <li>• There are no designated heritage assets within the site.</li> <li>• There are multiple designated heritage assets close to the site including: two Conservation Areas (Clipsham and Stretton); a Registered Park &amp; Garden (Exton); a listed farmhouse &amp; barn, and; A Scheduled Monument.</li> <li>• The assessment acknowledges inter-visibility between the site and the designated heritage assets.</li> <li>• The archaeological data demonstrates that there are artefacts from the pre-historic and medieval eras.</li> <li>• The report concludes that there were no heritage assets that constrained development.</li> </ul>	<ul style="list-style-type: none"> <li>• St George's site promoters have submitted a 'Heritage – Statement of Significance' in order to assess the significance of the historic built environment at St George's Barracks.</li> <li>• The assessment is consistent with Historic England's 'Good Practice Advice' and other guidance and a site visit has been undertaken.</li> <li>• The report considers above ground heritage assets.</li> <li>• The masterplan refers to an Archaeological Desk-Based Assessment of sub-surface archaeological issues relating to the redevelopment of St George's Barrack was undertaken in April 2018. The assessment concluded that there is a low potential for Paleolithic, Mesolithic and Neolithic artefacts.</li> <li>• A Geophysical Survey carried out within the southern half of the site in 2007, it is possible that as yet unrecorded elements could be found on-site.</li> <li>• The Appraisal considers both designated and non-designated heritage assets.</li> <li>• There are designated heritage assets within the site including the Thor missile site at former RAF North Luffenham a Grade: II* listed building. This falls outside of the area proposed for built development in the submitted masterplan.</li> <li>• There are multiple designated heritage assets close to the site including: Edith Weston Conservation Area; North Luffenham Conservation Area; multiple listed buildings (in North Luffenham and Edith Weston).</li> <li>• There are non-designated assets associated with the former use including the airfield, its watch towers and control towers. The report indicates that following assessment for potential listing but because of the extensive alterations it</li> </ul>

	<p>was considered that the airfield should not be listed.</p> <ul style="list-style-type: none"> <li>• The assessment identifies opportunities to incorporate heritage assets.</li> <li>• Historic England has been engaged in discussions at various key stages and have not identified any objection in principle. The re-use of some of the existing buildings and incorporation into the masterplan has been requested.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• An independent Heritage Assessment commissioned by the LPA could help to assess whether the potential developments could result in substantial harm.</li> <li>• Discussions with historic England are required.</li> <li>• A SoCG with Historic England would confirm the position.</li> </ul>	<ul style="list-style-type: none"> <li>• An independent Heritage Assessment commissioned by the LPA could help to assess whether the potential developments could result in substantial harm.</li> <li>• Ongoing discussions with historic England are required.</li> <li>• A SoCG with Historic England would confirm the position.</li> </ul>
<b>Conclusions</b>	
<p>The presence of heritage assets have been identified for both sites through the preparation of heritage assessments.</p> <p>The Woolfox site promotion is accompanied by an assessment of designated and non-designated assets and a desk-based assessment of archaeological potential. There are no designated heritage assets within the Woolfox site.</p> <p>There is a single designated asset within the St George’s Barracks site (which is separated from the main body of built development shown on the illustrative masterplan).</p> <p>Both sites have designated and non-designated assets outside of the sites, where the ‘settings’ could potentially be affected by development.</p> <p>The Heritage Appraisal for the Woolfox development concludes that that the site could be developed without harm to heritage assets. The St George’s Heritage ‘Statement of Significance’ does not identify any ‘showstoppers’ but confirms the importance of the grade II* listed Thor missile site and the significance of its setting in the wider airfield. Both sites have the potential for impacts on archaeology and the setting of heritage assets on the sites’ peripheries. The masterplan and detailed design for both sites should be capable of addressing these issues.</p> <p>Comments from Historic England have been sought in relation to St George’s site. Their views should also be sought in relation to the Woolfox site.</p> <p>Further detailed work would be required in order to demonstrate potential impacts on the settings of heritage assets once masterplans are worked up in greater detail. The assessment of potential</p>	

archaeological artefacts will be required for the preferred site in order to build on previous work. Given the previous uses of the land, there is likely to be substantial disturbance to below ground artefacts on parts of the sites.

Independent scrutiny of the submitted heritage work would assist the LPA in assessing the merits of each site in an impartial, open and robust manner. Notwithstanding this, based on the evidence available, there appears to be substantial scope to satisfactorily mitigate heritage assets and their settings within the substantial development areas. Both sites could be considered as 'potentially justified' options in the context of heritage assets.

Appendix 15 - Best & Most Versatile Agricultural Land	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• Woolfox site promoters have commissioned an 'Agricultural Considerations' report (produced by Kernon Countryside Consultants Ltd).</li> <li>• The report is desk based and uses data from agricultural land classification maps in order to identify the potential for Best &amp; Most Versatile Agricultural Land.</li> <li>• Based on Natural England maps the site is within an area with 'low to moderate' likelihood of BMV land.</li> <li>• The report acknowledges that there is some potential for BMV land on parts of the site and that land quality assessments may be needed for later phases of development.</li> <li>• A comparison is made with the St George's site where the majority of land also has low potential.</li> <li>• The report concludes that both sites are unlikely to have a significant adverse agricultural impact.</li> </ul>	<ul style="list-style-type: none"> <li>• No specific report has been produced that assesses Agricultural Land Quality.</li> <li>• Evidence is available using historic ALC maps and those produced by Natural England.</li> <li>• Most of the site is within an area with low potential for BMV agricultural land.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• More detailed assessment of agricultural land quality would indicate the pockets of BMV land within the site. The broad evidence is sufficient at this stage.</li> </ul>	<ul style="list-style-type: none"> <li>• More detailed assessment of agricultural land quality would indicate the pockets of BMV land within the site. The broad evidence is sufficient at this stage.</li> </ul>
<b>Conclusions</b>	
<p>The majority of land within both sites are of low to moderate likelihood of Best and Most Versatile Agricultural Land. More detailed assessment could add greater clarity on pockets of land with greater potential but this is unlikely to be essential given the 'high level' evidence available and the former uses of the sites.</p> <p>In the context of impacts on agricultural land (and in particular Best &amp; Most Versatile Land), both sites appear to be 'justified' as potential options.</p>	



Appendix 16 - Previously Developed land	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• The submitted masterplan demonstrates the areas that are proposed for development.</li> <li>• Only a small proportion of the site contains development that falls within the definition of PDL.</li> <li>• Some areas of former runway are still visible and can be considered 'fixed surface structures' that have not yet blended into the landscape.</li> <li>• Other sections of runway have blended in with the landscape (as evidenced from aerial photographs).</li> <li>• Only a modest section of the site can be considered to incorporate PDL.</li> </ul>	<ul style="list-style-type: none"> <li>• The masterplan shows the areas of the site that are proposed for development.</li> <li>• A substantial proportion of the proposed areas for housing and employment are on areas currently occupied by development associated with the St George's Barracks site including military accommodation, storage buildings and associated social and operations buildings.</li> <li>• The runways associated with the site remain largely intact and can be considered 'fixed surface structures' that have not yet blended into the landscape.</li> <li>• A substantial part of the site is proposed as a Country Park. This is partly on PDL in the form of the 'runways' in the southern parts of the site.</li> <li>• There are substantial areas of green space amongst the buildings associated with the barracks and these cannot be considered as PDL.</li> </ul>
Further work	
<ul style="list-style-type: none"> <li>• The existence of PDL is based on fact and further work would not add value.</li> </ul>	<ul style="list-style-type: none"> <li>• The existence of PDL is based on fact and further work would not add value.</li> </ul>
<b>Conclusions</b>	
<p>The definition contained within the National Planning Policy Framework (NPPF) indicates that the buildings and runways (other than those returned to agricultural use) on both sites are 'Previously Developed Land'. In addition, the definition of PDL within the NPPF includes the 'curtilage' of the developed land (although it should not be assumed that the whole of the curtilage should be developed). In accordance with this definition, the St George's site could be considered PDL. However, it is acknowledged that much is open in character.</p> <p>The proposed masterplan at St George's Barracks indicates that a substantial area of proposed built form is accommodated on areas that are previously developed land.</p> <p>The proposed development at Woolfox would contain only a very modest proportion of the development on PDL (mainly the parts of the runway that have not yet blended into the landscape). The majority of the site is open agricultural land and woodland.</p> <p>The NPPF states that: "The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist." In this respect, the proposed development at St George's barracks is consistent with national policy and in accordance with the policies in the Framework.</p>	

In the context of PDL, the site at St George’s appears to be ‘justified’ as a potential allocation.

Appendix 17 - Urban Design / Garden village principles	
Woolfox	St George’s
<ul style="list-style-type: none"> <li>• The Sustainability Appraisal promotes the Woolfox site as a ‘Garden Community’ / ‘New Garden Village’.</li> <li>• The Sustainability Appraisal indicates that the vision for the site is underpinned by the core values of ‘Garden Community Principles’.</li> <li>• The principles are described in the submitted sustainability appraisal and are broadly shown on the concept masterplan. The principles include: a range of housing densities, sustainable transport corridors, high quality design around ‘neighbourhoods’; connected green spaces; responding to the landscape character; resource efficiency; and provision of an urban farm / allotments.</li> <li>• Access to recreation and Green Infrastructure is a fundamental component of the concept.</li> <li>• The concept masterplan shows broad land uses and potential phasing. The masterplan does not contain the ‘fine-grain’ and does not show the pattern of blocks and streets.</li> </ul>	<ul style="list-style-type: none"> <li>• The masterplan promotes St George’s Barracks as a New Garden Village.</li> <li>• The masterplan explains how the site’s concepts have evolved in the context of Garden Community principles including: leadership and community engagement; Land value capture for the community; Mixed-tenure / affordable homes; strong employment offer; High-quality imaginative design; Generous green space linked to the wider natural environment; allotments; Access to services &amp; facilities; Integrated &amp; accessible transport.</li> <li>• The masterplan contains a preliminary layout that shows a block structure for potential development.</li> <li>• The masterplan contains considerable detail of how a distinctive ‘place’, that responds to the wider context could be achieved. This looks at the immediate and wider environs in terms of the types of places and spaces that defined the areas character.</li> <li>• The masterplan contains an assessment of the constraints and opportunities on site.</li> <li>• St George’s has had a successful bid to the Garden Communities programme MHCLG July 2019.</li> </ul>
Further work	
<ul style="list-style-type: none"> <li>• Further work would be required as part of a detailed masterplan to demonstrate how the development areas respond to site features (including topography, trees / woodlands and other site features).</li> <li>• More detail of the block structure would be useful.</li> </ul>	<ul style="list-style-type: none"> <li>• Further work would be required as part of a detailed masterplan to demonstrate how the development areas respond to site features (including topography, trees / woodlands and other site features).</li> </ul>

<ul style="list-style-type: none"> <li>• A provisional 'design code and design parameters would be required.</li> </ul>	<ul style="list-style-type: none"> <li>• A provisional 'design code and design parameters would be required.</li> </ul>
<p><b>Conclusions</b></p>	
<p>Both proposals are seeking to deliver a development based on Garden Village principles. At a high level, the documents broadly set out similar principles of: high quality design; a mix of uses; access to employment and homes; and substantial green infrastructure. Both contain concept masterplans that broadly set out the design parameters. The St George's masterplan offers a more detailed assessment of how the site has evolved in terms of potential development. However, the Woolfox proposal could develop a similar weight of evidence were it to be selected as the preferred option.</p> <p>There are no insurmountable barriers to developing high quality, well connected and distinctive places on either site. Further work is required on both sites in order to develop a responsive design framework, including more detailed masterplans, design codes and design parameters for different parts of the sites.</p> <p>St George's has recently been identified as one of 19 successful bids to the Garden Communities programme by the Ministry of Housing Communities and Local Government in July 2019</p> <p>It would be possible for both site promoters to develop proposals that would result in a high quality design and meet the principles of garden villages. Both sites are considered as 'justified' options for new garden villages in this regard.</p>	

Appendix 18 - Provision of Schools

Woolfox	St George's
<ul style="list-style-type: none"> <li>• Woolfox site promoters have submitted a 'development concept' and concept masterplan that identifies 2 x 2 form entry primary schools for the first phase of development (up to 2,500 houses).</li> <li>• Phase 2 development proposes a further 2 form entry school and secondary school.</li> <li>• Based on the 'yield' rates adopted by the LEA, this is an appropriate provision for primary education for phase 1.</li> <li>• The timing of delivery of a primary school would need to be early in the development and arrangements made for accommodating and transferring primary and secondary age pupils in other schools. No details are provided.</li> <li>• There are no primary schools within 2 miles of the site and no secondary schools within the immediate area.</li> <li>• The nearest secondary education provision is more than 3 miles from the site.</li> <li>• The site is sufficiently large to accommodate the necessary primary and secondary education requirements.</li> <li>• A notional figure for primary schools and secondary schools has been identified in the viability assessment.</li> </ul>	<ul style="list-style-type: none"> <li>• St George's site masterplan identifies a new primary school on site (Primary school size to be determined by the scale of the new community).</li> <li>• There are existing primary schools at North Luffenham and Edith Weston.</li> <li>• It is proposed that the Edith Weston Academy would be relocated to the new school site.</li> <li>• The proposal has the support in principle of Brooke Hill Academy Trust.</li> <li>• Based on the 'yield' rates adopted by the LEA, this is an appropriate provision for primary education.</li> <li>• The timing of delivery of a primary school would be dependent on the capacity of existing schools.</li> <li>• Arrangements for secondary school students are not clear.</li> <li>• There is no secondary school within the immediate area.</li> <li>• The site is sufficiently large to accommodate the necessary primary and secondary education requirements.</li> <li>• The cost of community infrastructure figure is included in the 2018 viability assessment (including education) which is also included in CIL costs.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• The 'in-principle' agreement of the LEA is required and a Statement of Common Ground if chosen as the preferred site.</li> <li>• The viability implications of developing schools needs to be considered.</li> <li>• Potential Academy Trusts or other long term managers need to be identified.</li> </ul>	<ul style="list-style-type: none"> <li>• The 'in-principle' agreement of the LEA is required.</li> <li>• The viability implications of developing schools needs to be considered.</li> </ul>
<b>Conclusions</b>	
<p>The evidence demonstrates that both sites are sufficiently large to accommodate the level of primary education requirements.</p>	

Based on established yield rates, there would be a need to accommodate some 2,100 primary age children at Woolfox and some 465 at St George's. A yield of some 220 secondary students at St George's and 1,000 at Woolfox would be generated.

Primary school pupils could be accommodated at Edith Weston School or North Luffenham School during early development at St George's Barracks. There is a proposal to relocate the primary school to St Georges. The Local Academy has confirmed that this is acceptable in principle.

Pupils from Woolfox would need to be transported off site (more than the 2 mile primary school travel distance) unless a school were to be provided at the earliest stages of development.

Secondary school students from Woolfox (phase 1) and St George's would need to be transported off site.

Further work is required from site promoters to add certainty to the delivery of schools. The 'in-principle' support of the LEA is required and the identification of a potential Academy Partner (or other operator) would be beneficial in the case of Woolfox. This has been secured for St George's. Further work is also required in relation to the 'viability' implications of delivering schools.

Based on the available evidence and discussions with the Local Education Authority, both sites have the potential to deliver the required education provision on site and can therefore be considered 'potentially justified' in the context of education provision. Woolfox is more constrained in accommodating primary school pupils in the early years owing to distance separation from the nearest primary school.

Appendix 19 - Provision of Health Care (primary and acute needs)

Woolfox	St George's
<ul style="list-style-type: none"> <li>• Woolfox site promoters have identified a 'Neighbourhood Centre' which would provide 'the full range of social and community facilities.</li> <li>• No definitive provision of a GP practice has been identified.</li> <li>• Discussions with the East Leicestershire &amp; Rutland Clinical Commissioning Group has indicated that there are capacity constraints in existing GP facilities that are closest to the Woolfox site.</li> <li>• A potential need for a new GP practice with capacity for c.13 practicing GPs if a full development of 10,000 dwellings were delivered (based on 2.4 people per dwelling and 1,800 people per practice doctor)</li> <li>• Phase 1 development of 2,500 houses would result in c.3 practicing GPs.</li> <li>• The Council's CIL charging schedule requires provision for New and expanded GP facilities.</li> <li>• Discussions with the CCG have identified capacity constraints in the nearest facilities at Empingham / Market Overton</li> <li>• Further work may be required to identify potential practice managers.</li> </ul>	<ul style="list-style-type: none"> <li>• St George's masterplan identifies a new health and wellbeing centre, providing a GP surgery and other facilities, along with a new pharmacy and flexible medical suite.</li> <li>• Discussions with the East Leicestershire &amp; Rutland Clinical Commissioning Group has indicated that there are capacity constraints in one existing GP facility and some capacity in another closest to the St George's site.</li> <li>• A potential need for c.3 practicing GPs if a full development of 2,215 dwellings were delivered (based on 2.4 people per dwelling and 1,800 people per practice doctor)</li> <li>• The Council's CIL charging schedule requires provision for New and expanded GP facilities.</li> <li>• Discussions with the CCG have identified capacity constraints in the nearest facilities at Empingham / Uppingham</li> <li>• Further work may be required to identify potential practice managers.</li> <li>• The CCG have indicated support in principle for the development.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• The in principle agreement of the CCG is required.</li> <li>• Potential long term operators of the GP practice need to be identified.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential long term operators of the GP practice need to be identified.</li> </ul>
<b>Conclusions</b>	
<p>Both sites will result in pressure on existing primary care facilities. There are potential capacity constraints at nearby facilities that will need to be mitigated. Both sites have the potential to accommodate facilities within a new local centre.</p> <p>Based on established patient yield rates, there would be a need to provide an additional 3 consulting rooms (phase 1 Woolfox and in total at St George's). The LPA's CIL charging schedule identifies new and expanded GP facilities as an area where funding is to be provided.</p>	

Further work is required from both site promoters to add certainty to the delivery of GP practices. The 'in-principle' support of the CCG through a Statement of Common Ground would be beneficial if either site were selected.

Identification of a potential GP Practice Partner (or other operator) would be beneficial for both sites.

St George's makes a more definitive commitment to a new health centre in early masterplan work and has the 'in-principle' support of the CCG. The Woolfox site has the potential to be able to deliver facilities on site, subject to viability.

Based on the available evidence and discussions with the Clinical Commissioning Group, both sites notionally have the potential to deliver the required primary care facilities on site or through extensions to existing practices. More work is required to be considered fully 'justified' in the context of health provision.

Appendix 20 - Utilities (including water, power and telecommunications)

Woolfox	St George's
<ul style="list-style-type: none"> <li>• Woolfox promoters have commissioned a 'Strategic utilities Infrastructure Assessment' by RPS Group to evaluate the existing provision of service apparatus in order to assess potential capacity and inform whether diversions would be required.</li> <li>• The report identifies some of the key infrastructure required to support the scheme including telecommunications and utilities.</li> <li>• The report indicates that there may be a need to locally divert some electricity supply apparatus including a high voltage cable close to the grade separated junction on the A1. The cost implications are yet to be established.</li> <li>• There are no records of gas supply within the site.</li> <li>• There is potential for local diversion or lowering of water mains associated with the grade separated junction on the A1. No cost estimates have been obtained.</li> <li>• The report identifies the presence of BT apparatus and no problems are envisaged in servicing the proposed development.</li> <li>• The report identifies the need for a 'new public sewerage network' within the site and the need to upgrade existing Waste Water Treatment Works.</li> <li>• Discussions with utilities providers are ongoing.</li> <li>• No costings for provision or relation have been identified.</li> </ul>	<ul style="list-style-type: none"> <li>• St George's promoters have commissioned a report by Daedalus Environmental Limited to understand infrastructure requirements.</li> <li>• The report considers: transport, water &amp; drainage, energy, and IT infrastructure.</li> <li>• Some capacity improvements are required in relation to water supply (these have provisional costs of £872k);</li> <li>• There is some available capacity at the Waste Water Treatment Works adjacent to the River Charter but capacity improvements will be required over 2,990 additional people.</li> <li>• Current gas supplies would service approximately 20% of the potential capacity.</li> <li>• In the context of electricity, a new primary 33kV service and Primary substation is required on or adjacent to the site.</li> <li>• There is an aspiration to move away from fossil fuels.</li> <li>• Costings and a delivery programme are identified.</li> <li>• The viability assessment (2018) identifies potential costs of utility upgrades.</li> </ul>
Further work	
<ul style="list-style-type: none"> <li>• Discussions with utilities providers are required to confirm potential capacity issues and requirements to divert service apparatus.</li> <li>• The cost implications of provision / diversion or upgrading of apparatus needs to be considered in the viability appraisal.</li> </ul>	<ul style="list-style-type: none"> <li>• Further discussions with utilities providers are required to confirm potential capacity issues and requirements to divert service apparatus.</li> <li>• The detailed cost implications of provision / diversion or upgrading of</li> </ul>



	apparatus needs to be considered in the viability appraisal.
<b>Conclusions</b>	
<p>Both sites have the potential to exceed the available capacity of utilities provision. It is apparent, from the evidence available, that ‘technically’ both sites would be able to mitigate any shortfalls in capacity. However, further work needs to be undertaken to understand the costs associated with improving provision (particularly at Woolfox where very limited information has been provided in relation to the cost of infrastructure provision). The provision of a gas supply at Woolfox appears to be more problematic, but this is not a ‘showstopper’ in the context of the availability of alternative sources of energy and the objective of moving away from fossil fuels.</p> <p>Given the scale of the proposals and existing utilities infrastructure within and adjacent to the sites, it would appear technically possible to mitigate any impacts. In this context, both sites would be ‘effective’ as potential options as infrastructure could be delivered. At this time, it is not possible to indicate that Woolfox is ‘justified’ as the evidence does not indicate the costings of infrastructure provision / relocation.</p> <p>Further engagement is required with the utilities providers to confirm that there are no ‘showstoppers’ and that the sites are therefore ‘effective’ in the context of deliverability.</p>	

Appendix 21 - Retail facilities

Woolfox	St George's
<ul style="list-style-type: none"> <li>• Woolfox site promoters have identified two 'Local Centres' which could provide retail as well as social and community facilities.</li> <li>• No definitive retail provision has been identified.</li> <li>• The potential returns from retail development are not set out in the viability appraisal.</li> <li>• Further work may be required to identify the potential for A1 – A5 retail facilities based on evidence.</li> </ul>	<ul style="list-style-type: none"> <li>• The St George's Master Plan identifies a 'Local Centre' which could provide retail, community and associated uses.</li> <li>• No definitive retail floorspace provision has been identified for A1 to A5 uses.</li> <li>• Further work may be required to identify the potential for A1 – A5 retail facilities based on evidence.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Evidence of need for A1 – A5 uses arising from populations of new settlements should be addressed in any retail assessment submitted as part of a masterplan or planning application.</li> <li>• An indication of the potential floorspace for A1-A5 uses should be addressed in the emerging masterplan.</li> <li>• The LPA should include a policy setting out the expectations for new retail floorspace arising from the new settlement based on evidence from a retail study.</li> </ul>	<ul style="list-style-type: none"> <li>• Evidence of need for A1 – A5 uses arising from populations of new settlements should be addressed in any retail assessment submitted as part of a masterplan or planning application.</li> <li>• An indication of the potential floorspace for A1 - A5 uses should be addressed in the emerging masterplan.</li> <li>• The LPA should include a policy setting out the expectations for new retail floorspace arising from the new settlement based on evidence from a retail study.</li> </ul>
<b>Conclusions</b>	
<p>Both sites will result in the potential for increased retail expenditure and an associated demand for retail facilities. Both sites identify proposed new local centres which could accommodate new retail facilities.</p> <p>The Rutland County Council Retail capacity assessment 2016 identified a quantitative 'need' for up to 4,700 sq.m net additional comparison goods floorspace for the County (up to 2036), the majority of which arises post-2025, with a very limited quantitative 'need' for new convenience goods floorspace.</p> <p>Further work would be required from both site promoters to provide evidence of the potential need for retail floorspace and the potential impact of the quantum of floorspace proposed on existing centres (normally on developments over 2,500 square metres gross floorspace). Accommodating retail facilities within a defined local centre is consistent with advice contained within the National Planning Policy Framework.</p>	

Based on the submitted masterplans, both sites have the potential to accommodate retail development within a defined local centre and can be considered 'justified' in the context of retail provision. There is no certainty of delivery that result in the sites being considered 'effective'. However, given the quantum of potential population there is a critical mass of population that would support retail provision. Further evidence would clarify the amount of retail floorspace that is justified.

Appendix 22 - Community facilities

Woolfox	St George's
<ul style="list-style-type: none"> <li>• Woolfox site promoters have identified two 'Local Centres' which could provide community facilities.</li> <li>• It is likely that facilities such as community halls / meeting rooms, library, crèche / nursery etc. could be supported in a development of this scale.</li> <li>• No definitive provision has been identified.</li> <li>• Further work may be required to identify the need for community uses based on evidence.</li> </ul>	<ul style="list-style-type: none"> <li>• The St George's Master Plan identifies a 'Local Centre' which could provide community and associated uses.</li> <li>• It is likely that facilities such as community halls / meeting rooms, library, crèche / nursery etc. could be supported in a development of this scale.</li> <li>• An indoor village / community hall of 500sq m has been identified in the initial masterplan.</li> <li>• Further work may be required to identify the need for community facilities based on evidence.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Potential community uses should be addressed in the emerging masterplan.</li> <li>• The LPA should include a policy setting out the expectations for new community facilities arising from the new population.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential community uses should be addressed in the emerging masterplan.</li> <li>• The LPA should include a policy setting out the expectations for new community facilities arising from the new population.</li> </ul>
<b>Conclusions</b>	
<p>Both sites will result in the potential to generate communities of sufficient scale that would be capable of supporting community facilities such as community halls. Both sites identify proposed new local centres which could accommodate these facilities.</p> <p>Further work is required from both site promoters to provide for these needs. Based on the submitted masterplans, both sites have the potential to accommodate community uses within a defined local centre and can therefore be considered 'potentially justified' in the context of provision of community facilities. Whilst there is no certainty of delivery, there are no reasons to suggest that the sites could not be considered potentially 'effective' in delivering such uses.</p>	

Appendix 23 - Parks and Open Spaces

Woolfox	St George's
<ul style="list-style-type: none"> <li>• The Woolfox Concept Masterplan identifies potential Play and Open Spaces.</li> <li>• Four areas for formal sports are identified.</li> <li>• Two 'proposed destination play areas are identified'</li> <li>• The supporting SA indicates that 'Garden Village' principles will be pursued. The proposal seeks to deliver 'connected strategic green open spaces.</li> <li>• The site is substantial in size and has the potential to deliver adequate POS as part of the development.</li> </ul>	<ul style="list-style-type: none"> <li>• The St George's Masterplan identifies potential Play and Open Spaces.</li> <li>• Two large and several smaller open spaces are identified for Play and open Space.</li> <li>• A village green and open space / green gap are specifically identified'</li> <li>• The masterplan refers to 'Garden Village' principles including 'Generous green space linked to the wider natural environment, including a mix of public and private networks of well-managed, high-quality gardens, tree-lined streets and open spaces'.</li> <li>• The site is substantial in size and has the potential to deliver adequate POS as part of the development.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Further work may be required to identify the specific sites and their function if Woolfox is the preferred site.</li> </ul>	<ul style="list-style-type: none"> <li>• Further work may be required to identify the specific sites and their function if St George's is the preferred site.</li> </ul>
<b>Conclusions</b>	
<p>One of the key principles of New Settlements that are to be considered 'Garden Villages' are that they contain linked Green Spaces and vibrant parks with access to nature and opportunities for biodiversity.</p> <p>Both Masterplans identify substantial parts of the sites that are identified as green space that could contain open spaces suitable for play and sports provision.</p> <p>Further work would be required from the preferred site promoter to identify the precise locations and form of POS through more detailed / fine grained masterplans.</p> <p>The substantial scale of both proposals and the potential POS solutions identified in the submitted illustrative masterplans demonstrate that both sites are potentially 'justified' and 'effective' solutions in the context of POS delivery.</p>	

Appendix 24 - Strategic Green Infrastructure

Woolfox	St George's
<ul style="list-style-type: none"> <li>• The Woolfox Concept Masterplan identifies substantial areas of linked green spaces including corridors of Green space that traverse the site and allow links for pedestrians, cyclists and wildlife.</li> <li>• An urban farm / allotment area, community park and informal leisure parkland are identified.</li> <li>• The site is substantial in size and has the potential to deliver adequate linked green infrastructure as part of the development.</li> </ul>	<ul style="list-style-type: none"> <li>• The St George's Masterplan identifies substantial areas of multi-functional green spaces linked by green corridors.</li> <li>• A 125ha Country Park is proposed to the south-east of the site. It is acknowledged that this is also in a mineral extraction zone and could be potentially unusable in the long term.</li> <li>• A village green and open space / green gap are specifically identified'</li> <li>• The masterplan refers to 'Garden Village' principles including 'Generous green space linked to the wider natural environment'.</li> <li>• The site is substantial in size and has the potential to deliver adequate linked green infrastructure as part of the development.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Further work may be required to identify the Green Infrastructure networks in more detail if Woolfox is the preferred site.</li> </ul>	<ul style="list-style-type: none"> <li>• Further work may be required to identify the Green Infrastructure networks in more detail if St George's is the preferred site.</li> </ul>
<b>Conclusions</b>	
<p>Both Masterplans identify substantial parts of the sites that could be considered Strategic Green Infrastructure including large areas of accessible green spaces linked by a series of green corridors. The masterplan evidence is proportionate in terms of identifying that, in principle, both sites are capable of delivering appropriate levels of GI.</p> <p>The substantial scale of both proposals and the potential for Green Infrastructure identified in the submitted illustrative masterplans demonstrate that both sites are potentially 'justified' and 'effective' solutions in the context of Green Infrastructure.</p>	

Appendix 25 - Impacts of development traffic

Woolfox	St George's
<ul style="list-style-type: none"> <li>• Woolfox site promoters have commissioned an 'Initial Transport Appraisal' through consultants RPS (March 2019).</li> <li>• The appraisal gives an overview of: potential access and accessibility; availability of public transport (and footways and cycle routes); measures to reduce travel by car; and potential traffic impacts.</li> <li>• The 'Initial Transport Appraisal' identifies potential peak hour trip rates (all modes) from phase 1 (2,500 houses) and phase 2 (10,000 houses). The report identifies a two way all person trip rate for phases 1 and 2.</li> <li>• The potential impact of proposed employment development is not considered in detail.</li> <li>• The majority of trips are by car and attributed to education and employment.</li> <li>• The report uses TRICs database to calculate trip generation and volume of movements.</li> <li>• The report looks broadly at trip distribution indicating that, in terms of work place destinations, some 70% of journeys will access the A1 (45% south and 25% north in the am peak). 30% will use local routes.</li> <li>• Volumes of traffic are assessed on key routes including: A1 (north &amp; south); B668 west towards Oakham; Hooby Lane; Clipsham Road and Grantham Lane.</li> <li>• Provision of services and facilities on site (including new schools) is considered to help mitigate impacts by reducing off site movements.</li> <li>• The report identifies that a Full Transport assessment will be required. A TA had been submitted at the time of finalising this report, but had not been independently scrutinised</li> </ul>	<ul style="list-style-type: none"> <li>• St George's site promoters have commissioned two 'Transport Assessments' (through consultants AECOM April 2018 and Campbell Reith November 2018) with subsequent trip generation work being carried out by Campbell Reith (March 2019).</li> <li>• The Transport Assessments give an overview of the existing network (baseline review); accessibility; trip generation; traffic impact; and mitigation measures.</li> <li>• The latest assessment considers the impacts of: c.2,500 houses and c.62,000 sq. m of employment floorspace.</li> <li>• The report uses TRICs database to calculate trip generation and volume of movements.</li> <li>• The report considers how trips will be distributed.</li> <li>• The impact on key junctions is considered using Ratio to Flow Capacity (RFC) to assess where there are identified constraints.</li> <li>• The report considers the impact on capacity without development and with development.</li> <li>• A wide range of mitigation measures are proposed and the potential impacts on RFC.</li> <li>• Potential costs of the mitigation measures are identified.</li> <li>• The report indicates that 'with improvements' most junctions can operate satisfactorily up to 2041 (with development).</li> </ul>

<b>Further work</b>	
<ul style="list-style-type: none"> <li>• The report requires independent scrutiny to assess its robustness. An independent analysis commissioned by the LPA could help to assess whether the potential developments have the potential for adverse impacts on links and junctions could result in significant harm. The study should consider the potential for any mitigation measures and the impact that these may have.</li> <li>• A full Transport Assessment would be required by the site promoters if the site is pursued as a preferred option or if the promoters seek to pursue the scheme as a planning application.</li> <li>• The cost of potential transport infrastructure provision and mitigation works (including a new grade separated junction on the A1) needs to be identified and the implications for viability assessed, particularly in light of the early delivery after 500 houses and other associated infrastructure.</li> <li>• The in principle support for a grade separated junction on the A1 needs to be gained from Highways England.</li> <li>• The agreement in principle of both Highways England and the Local Highway Authority will be required.</li> <li>• SoCG in relation to transport issues.</li> </ul>	<ul style="list-style-type: none"> <li>• An independent assessment of the submitted transport evidence should be commissioned by the LPA in order to assess whether the findings of initial transport work is robust and whether the development options have the potential for impacts on links and junctions could result in significant harm. The study should consider the potential for any mitigation measures and the impact that these may have.</li> <li>• A full Transport Assessment would be required by the site promoters at a more detailed stage.</li> <li>• The agreement in principle of the Local Highway Authority (and potentially Highways England) will be required.</li> <li>• SoCG in relation to transport issues.</li> </ul>
<b>Conclusions</b>	
<p>A Transport Assessment has been prepared for St George’s site and an ‘Initial Transport appraisal’ for Woolfox<sup>15</sup>. These reports have been prepared on behalf of the site promoters to support the proposals.</p> <p>The transport assessment for Woolfox is at a very high level given the proposed scale of development. It is apparent that further transport evidence would be required in order to support the proposal as a ‘justified’ allocation. This is acknowledged by the site promoters who indicate that a Full Transport Assessment would be required for the site. At the time of drafting this report, no formalised Transport Assessment had been carried out in relation to the Woolfox proposal and it is therefore not ‘justified’ as a suitable option at this time. However, the site promoters have acknowledged that a full TA is required and being prepared. The production of a proportionate TA would allow the site to be considered ‘justified’ in transport terms.</p>	

<sup>15</sup> A Transport Assessment had been submitted at the time of finalizing this report but was, as yet unconsidered



There are substantial transport infrastructure requirements associated with the Woolfox proposal, including provision of a grade separated junction on the A1. These need to be fully costed and the viability implications assessed in order to demonstrate that the proposal could effectively be delivered.

The St Georges transport assessment considers the impact of traffic arising from the development. The report uses TRICs database to calculate trip generation and volume of movements and how trips will be distributed. The impact on key junctions is considered using Ratio to Flow Capacity (RFC) to assess identified constraints and where junction improvements will be required including possible solutions as mitigation. The mitigation measures are costed.

The technical merits of each of the submitted reports is beyond the scope of this report. The Local Highway Authority and Highways England will need to confirm that they are satisfied with the submitted evidence and that it is a proportionate evidence base.

An independent assessment of the technical merits and findings contained within the reports would demonstrate that the LPA has approached each site in an open and consistent manner. There will be an expectation from the appointed Planning Inspector that the transport impacts and implications of reasonable options have been considered in this way.

The Local Planning Authority will need to provide a 'proportionate' evidence base to demonstrate that their choice of site is justified in the context of transport impacts and implications.

At the time of drafting this report, the transport evidence provided in relation to the St George's site is proportionate when compared to other sound Local Plan evidence bases. Subject to independent scrutiny of the detailed technical content, it appears that the site could be 'justified' as a potential allocation.

In the context of Woolfox, a Transport Assessment is needed and at the time of finalizing this report is proposed to be submitted. Subject to completion and Independent analysis of the evidence, any deficiencies in the transport evidence for Woolfox that existed at the time of drafting this report could be remedied. If independent scrutiny indicates that the evidence is proportionate and robust the site would potentially be justified in terms of transport impacts.

Appendix 26 - Availability of public transport

Woolfox	St George's
<ul style="list-style-type: none"> <li>• The Woolfox 'Initial Transport Appraisal' (RPS) considers the potential for public transport</li> <li>• The assessment indicates that the sites location has limited access to public transport.</li> <li>• The report acknowledges that development would need to provide new bus services as part of the proposal.</li> <li>• The new development proposes two new bus services to Stamford/ Oakham (20min frequency Mon – Sat) to Peterborough (30min frequency Mon – Sat).</li> </ul>	<ul style="list-style-type: none"> <li>• The St George's 'Transport Assessment' (AECOM) identifies the potential for public transport</li> <li>• The assessment identifies the location of the nearest public transport options.</li> <li>• An existing bus service can be accessed some 400m from the site.</li> <li>• The no.12 service is currently a 2 hour frequency and runs from Stamford to Uppingham.</li> <li>• Public transport improvements are proposed, including designing development to accommodate high quality public transport service – building on the no.12 service.</li> <li>• An improved linkage with the No.9 service between Oakham, Stamford and Peterborough is proposed with improved frequency.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Evidence of support from bus service providers would help give certainty.</li> <li>• Cost implications of improved public transport provision needs to be addressed in the overall viability appraisal.</li> <li>• The emerging policy could identify provision of public transport.</li> </ul>	<ul style="list-style-type: none"> <li>• Evidence of support from bus service providers would help give certainty.</li> <li>• Further details of frequency required.</li> <li>• Cost implications of improved public transport provision needs to be addressed in the overall viability appraisal.</li> <li>• The emerging policy could identify provision of public transport.</li> </ul>
<b>Conclusions</b>	
<p>Both proposals identify improvements to public transport. The evidence is at a high level. Further evidence would be required to support a more detailed proposal including identifying a potential operator and costs of provision (to be included in any viability assessment).</p> <p>The evidence provided at this stage is 'proportionate' to demonstrate a commitment to public transport provision and both sites would be 'justified' as potential allocations. Further work would be required in relation to viability in order to demonstrate that the proposed public transport improvements are deliverable. Some high level costings work has been produced in relation to St George's.</p> <p>At this stage both sites could be considered 'justified' in the context of public transport provision.</p>	

Appendix 27 - Access to cycling networks	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• The Woolfox 'Initial Transport Appraisal' (RPS) considers the potential for cycling</li> <li>• The appraisal indicates that the network of cycle routes and quiet roads suitable for cycling in the immediate area.</li> <li>• The report proposes that footway and cycleway links within the development will be a key element of the design.</li> <li>• It is proposed that the internal footway/cycleway network will also provide links to the wider PRow routes and National Cycle Network.</li> </ul>	<ul style="list-style-type: none"> <li>• The St George's 'Transport Assessment' (AECOM) includes a section on cycling access.</li> <li>• The assessment identifies the network of cycle routes in the immediate area.</li> <li>• The assessment shows a 3 mile isochrones and access to the leisure route around Rutland Water.</li> <li>• The report proposes that the development will be designed to incorporate a well-defined walking and cycling infrastructure.</li> <li>• The report is costed indicating that off-site Walking and Cycling Improvements would be £1,000,000 - £1,500,000.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Details of potential costs of provision are required.</li> <li>• Further details of how the site could link to wider networks.</li> <li>• The emerging policy could address provision of cycling within the site and how it joins routes off site.</li> </ul>	<ul style="list-style-type: none"> <li>• Implications of costings in relation to viability.</li> <li>• The emerging policy could address provision of cycling within the site and how it joins routes off site.</li> </ul>
<b>Conclusions</b>	
<p>Both proposals identify potential improvements to cycling. The evidence for St George's site includes potential costs. Woolfox requires costings to be identified. Both sites require costings to be included in any viability assessment.</p> <p>The evidence provided at this stage is 'proportionate' to demonstrate a commitment to cycling provision and both sites would be 'justified' as potential allocations. Emerging policy could seek provision of on and off site cycling facilities. A requirement to provide detailed masterplans could be included in any emerging policy in terms of provision of walking and cycling facilities.</p> <p>At this stage both sites could be considered justified in the context of cycling provision.</p>	

Appendix 28 - Access to public footpath networks	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• The Woolfox 'Initial Transport Appraisal' (RPS) considers the potential for walking</li> <li>• The appraisal indicates that access to schools and other facilities could be achieved on-foot.</li> <li>• The report proposes that footway and cycleway links within the development will a key element of the design.</li> <li>• It is proposed that the internal footway/cycleway network will also provide links to the wider Network.</li> </ul>	<ul style="list-style-type: none"> <li>• The St George's 'Transport Assessment' (AECOM) includes a section on pedestrian access.</li> <li>• Walking is considered the most important mode of travel at the local level and offers the greatest potential to replace short car trips (under 2 kilometres).</li> <li>• The report includes a walking distance accessibility map.</li> <li>• Externally the development will provide strategic walking and cycling links to areas such as Oakham, Stamford and Rutland Water.</li> <li>• The report is costed indicating that off-site Walking and Cycling Improvements would be £1,000,000 - £1,500,000.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Details of potential costs of provision are required.</li> <li>• The emerging policy could address provision of cycling within the site and how it joins routes off site.</li> </ul>	<ul style="list-style-type: none"> <li>• The emerging policy could address provision of walking within the site and how it joins routes off site.</li> </ul>
<b>Conclusions</b>	
<p>Both proposals identify potential improvements to walking. The evidence for St George's site includes potential costs. Woolfox requires costings to be included. Viability assessment work needs to include walking improvement costs.</p> <p>The evidence provided at this stage is 'proportionate' to demonstrate a commitment to walking and both sites would be 'justified' as potential allocations. Emerging policy could seek provision of on and off site cycling facilities. A requirement to provide detailed masterplans could be included in any emerging policy in terms of provision of walking and cycling facilities.</p> <p>At this stage both sites could be considered justified in the context of pedestrian access.</p>	

Appendix 29 - Public rights of way

Woolfox	St George's
<ul style="list-style-type: none"> <li>• The Woolfox 'Initial Transport Appraisal' (RPS) indicates that the site covers a large area which includes a number of existing public right of way routes.</li> <li>• The site is of sufficient scale to accommodate existing rights of way within the design.</li> </ul>	<ul style="list-style-type: none"> <li>• The St George's 'Transport Assessment' (AECOM) indicates that the site includes some public right of way routes. The former military use of the site limits public rights of way on this part of the site.</li> <li>• The site is of sufficient scale to accommodate existing rights of way within the design.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Emerging masterplans and detailed proposals will need to identify how existing rights of way are incorporated into the design of the proposal.</li> </ul>	<ul style="list-style-type: none"> <li>• Emerging masterplans and detailed proposals will need to identify how existing rights of way are incorporated into the design of the proposal.</li> </ul>
<b>Conclusions</b>	
<p>Both proposals have an impact on Public Rights of Way. Emerging masterplans and detailed designs have the potential to accommodate public rights of way within development proposals.</p> <p>Rights of Way maps have been used to identify existing routes and the evidence provided at this stage is 'proportionate' to demonstrate that PRow have been considered.</p> <p>At this stage both sites could be considered justified in the context of Public Rights of way.</p>	

Appendix 30 - Potential to incorporate new transport technologies	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• The potential for improved transport technologies is not considered in detail in the proposed submission.</li> <li>• No issues have been identified that suggest new technologies could not be incorporated in any new scheme.</li> </ul>	<ul style="list-style-type: none"> <li>• The potential for improved transport technologies is not considered in detail in the proposed submission.</li> <li>• No issues have been identified that suggest new technologies could not be incorporated in any new scheme.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Viability assessment to consider the potential cost implications of delivering electric vehicle charging points to all new residential properties.</li> <li>• Travel plans and detailed assessments would be required at the planning application stage should the site be identified as a preferred option.</li> <li>• Ongoing discussions with Western Power regarding the ability to provide sufficient power.</li> </ul>	<ul style="list-style-type: none"> <li>• Viability assessment to consider the potential cost implications of delivering electric vehicle charging points to all new residential properties.</li> <li>• Travel plans and detailed assessments would be required at the planning application stage should the site be identified as a preferred option.</li> <li>• Ongoing discussions with Western Power regarding the ability to provide sufficient power.</li> </ul>
<b>Conclusions</b>	
<p>Paragraph 102 of the National Planning Policy Framework indicates that “Transport issues should be considered from the earliest stages of plan-making and development proposals, so that: ..... b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised.....”</p> <p>Transport technologies are likely to change over the duration of the Rutland Local Plan. Electric and zero-emission vehicles, self-driving vehicles, increased role of GPS in transport choice and smart transport solutions.</p> <p>The transport assessment and masterplans for both sites are not sufficiently detailed at this stage to fully assess this issue. Whilst there are cost implications for delivering new transport technologies (primarily the infrastructure costs of providing additional electricity capacity for electric vehicles) no overriding reasons have been identified that would indicate that either site would not, in principle, be able to provide for technological advances in transport. Viability implications will need to be assessed.</p> <p>In this respect both sites have the potential be considered as ‘justified’ and ‘effective’ and consistent with national policy.</p>	

Appendix 31 - Major transport infrastructure

Woolfox	St George's
<ul style="list-style-type: none"> <li>• A new grade separated junction is proposed onto the A1.</li> <li>• The Initial Transport Appraisal indicates that the grade separated junction would be delivered after 500 homes are completed.</li> <li>• The viability assessment indicates that the cost of the new junction would be some £20m.</li> <li>• Volumes of traffic are assessed on key routes including: A1 (north &amp; south); B668 west towards Oakham; Hooby Lane; Clipsham Road and Grantham Lane.</li> <li>• The report provisionally identifies that there is available capacity on the A1 and local roads.</li> <li>• A preliminary proposal for the grade separated junction has been submitted as part of the 'Initial Transport Appraisal'.</li> </ul>	<ul style="list-style-type: none"> <li>• No 'major' transport infrastructure is proposed.</li> <li>• Junction improvements on nearby classified roads (including the A47, A6003, and A606 (along with improvements to local roads) do not amount to major infrastructure but are the types of improvements that would be anticipated from a development of this scale.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• Viability assessment to consider the potential cost implications of delivering the bridge after 500 homes.</li> <li>• The proposed access arrangements and associated impact on the Strategic Road Network will need to be pursued with DfT / Highways England.</li> <li>• The issue will need to be addressed through the provision of a 'Statement of Common Ground' with Highways England.</li> <li>• Independent assessment of the merits of the submitted 'Initial Transport Appraisal'.</li> </ul>	<ul style="list-style-type: none"> <li>• Assess the implications of any updated transport work and the cumulative impacts of planned and committed growth including to the north of Stamford.</li> <li>• Independent assessment of the merits of the submitted 'Transport Assessment'.</li> </ul>
<b>Conclusions</b>	
<p>The Woolfox proposal includes delivery of a grade separated junction on the A1 to achieve satisfactory access. No major transport infrastructure is proposed for the St George's site, although some improvements to junctions on classified roads are anticipated.</p> <p>The implications of the new grade separated junction on the A1 need to be carefully assessed. Highways England need to be engaged on an ongoing basis in order to confirm that they are satisfied in principle with Woolfox. Initial correspondence has indicated that a:</p>	

***“.....strategic modelling exercise should be carried out. This would allow us to advise on the SRN junctions that need to be further assessed.”***

The Council should commission an independent assessment of the merits of the Transport Assessments for both sites which would consider, amongst other things, the potential impacts of the major transport infrastructure.

In the context of Woolfox, a Transport Assessment is proposed which may consider the impacts of the proposed new A1 junction in more detail. Subject to completion and Independent analysis of this evidence, the site could potentially be justified.

A Statement of Common Ground will be required with Highways England if Woolfox is the preferred option for a New Settlement.



Appendix 32 - Employment Provision	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• 27ha of employment land is promoted (including 19ha:B8/ 4ha B1&amp;B2 and a 4ha service area on the A1.</li> <li>• An Economic benefits statement has been prepared that considers: <ul style="list-style-type: none"> <li>○ The potential numbers of jobs created;</li> <li>○ The economic benefits associated with construction, growth in population (household spend / first occupation and Council tax).</li> </ul> </li> <li>• The longer term commercial benefits are also addressed. The report contains a brief demographic overview.</li> <li>• The proposed quantity of employment land exceeds the outstanding requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• 14ha of employment land are promoted.</li> <li>• An Employment Strategy has been produced that considers: <ul style="list-style-type: none"> <li>○ The types of jobs and businesses that could be attracted to St Georges.</li> <li>○ The amount of floorspace required.</li> <li>○ The number of jobs generated.</li> <li>○ A brief demographic overview informing the types of employment.</li> </ul> </li> <li>• A high level viability assessment is included in conjunction with Local Agents.</li> <li>• The proposed quantity of employment land exceeds the outstanding requirements but allows for a mix of uses on site.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• More detail required regarding the A1 service facility and any support from Highways England;</li> <li>• Potential trajectory.</li> <li>• Policy to ensure that the correct quantity and mix of employment is provided.</li> <li>• Potential market testing.</li> </ul>	<ul style="list-style-type: none"> <li>• Potential trajectory.</li> <li>• Policy to ensure that the correct quantity and mix of employment is provided.</li> <li>• Potential market testing.</li> </ul>
<b>Conclusions</b>	
<p>The emerging Local Plan has an outstanding requirement for some 25 hectares of employment land in addition to allocations, completions and commitments (subsequently reduced in BE Group report).</p> <p>Both Woolfox and St George's would exceed the outstanding requirement during the plan period. The addition of employment land above the requirements, as identified in the supporting evidence, is not considered detrimental in that it reflects the NPPF approach to Economic Growth, allows flexibility and provides a mix of uses that allow the potential for co-location of work and homes. In this respect both are 'justified' solutions to meeting employment land needs.</p> <p>Further information regarding an employment trajectory and start dates will be required to help inform the final choice of a preferred option. Notwithstanding the longer lead-in times associated with strategic developments, it is reasonable to assume that both sites would be capable of delivering outstanding employment requirements during the plan period.</p>	

Appendix 33 - Construction and longer term economic benefits	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• The 'Economic benefits' statement considers the impacts during and after development:</li> <li>• Construction Impacts include Direct and indirect construction-related employment, contribution of the construction phase to economic output.</li> <li>• Operational impacts include a growing labour force, increased Household spend and additional Council Tax.</li> <li>• The commercial aspects of the scheme provide some 2,100 additional jobs potential jobs created, Contribution to economic output and increased business rates.</li> </ul>	<ul style="list-style-type: none"> <li>• The Employment Strategy report broadly identifies the types of potential employment.</li> <li>• Some 2,100 jobs are envisaged.</li> <li>• The associated economic benefits during construction, operation and resulting from occupation are not explicitly referred to.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• No additional work has been identified to provide additional justification.</li> </ul>	<ul style="list-style-type: none"> <li>• The potential wider economic benefits could be assessed but it is a safe assumption that positive economic implications would result from construction, employment and additional provision of Council tax and Business rates.</li> </ul>
<b>Conclusions</b>	
<p>Both sites have the potential for long term economic benefits associated with growth.</p> <p>The Woolfox evidence contains a more detailed examination of the potential economic benefits associated with development. The St George's evidence concentrates on the impacts on jobs. A broad indication of the associated economic benefits could be carried out for St George's site to clarify potential impacts. Anecdotal evidence suggests that these would be proportionately consistent with those identified at Woolfox</p> <p>At this stage, both sites could be considered 'justified' and consistent with National Policy in terms of Construction and longer term economic benefits.</p>	

Appendix 34 - Broad consistency with National Policy	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• The proposal is broadly consistent with National Policy (NPPF and Planning Practice Guidance)</li> <li>• New settlements are supported in principle (para 72)</li> <li>• Garden Community principles (para 72)</li> <li>• Economic growth (Section 6)</li> <li>• Boosting housing supply (Para 59)</li> </ul>	<ul style="list-style-type: none"> <li>• The proposal is broadly consistent with National Policy (NPPF and Planning Practice Guidance)</li> <li>• New settlements are supported in principle (para 72)</li> <li>• Garden Community principles (para 72)</li> <li>• Economic growth (Section 6)</li> <li>• Boosting housing supply (Para 59)</li> <li>• Making effective use of land (Para 117)</li> </ul>
Further work	
<ul style="list-style-type: none"> <li>• An assessment can be made using the 'Soundness self-assessment checklist.</li> <li>• An assessment of the impacts on health could be undertaken at a high level.</li> <li>• Assess the broad principles of the emerging masterplans against BfL 12 standards to ensure high quality design.</li> <li>• Details of measures to mitigate and adapt to climate change could be addressed in emerging masterplans and detailed designs.</li> </ul>	<ul style="list-style-type: none"> <li>• An assessment can be made using the 'Soundness self-assessment checklist.</li> <li>• An assessment of the impacts on health could be undertaken at a high level.</li> <li>• Assess the broad principles of the emerging masterplans against BfL 12 standards to ensure high quality design.</li> <li>• Details of measures to mitigate and adapt to climate change could be addressed in emerging masterplans and detailed designs.</li> </ul>
Conclusions	
<p>Both sites have the potential to be broadly consistent with National Policy as set out in the NPPF.</p> <p>More detailed masterplanning, phasing and delivery plans and detailed design will inform both sites ability to meet other elements of the NPPF including: 'promoting sustainable transport'; Promoting healthy lifestyles; and securing high quality; and meeting the challenges of climate change.</p> <p>At this stage, both sites could be considered broadly consistent with National Policy and there is potential to remedy / clarify any areas where consistency is not clear.</p>	

Appendix 35 - Consistency with National Policy (Larger Scale Development)	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• New settlements are supported in principle (para 72)</li> <li>• The NPPF supports new settlements that are well located and designed, and supported by the necessary infrastructure and facilities.</li> <li>• Woolfox is isolated from existing settlements and is some 5 miles from Stamford.</li> <li>• The evidence provided in the Sustainability Appraisal, masterplan and other supporting documents identifies a wide range of supporting infrastructure. Further work is required in order to give certainty of delivery, including more detailed viability assessment.</li> </ul>	<ul style="list-style-type: none"> <li>• New settlements are supported in principle (para 72)</li> <li>• The NPPF supports new settlements that are well located and designed, and supported by the necessary infrastructure and facilities.</li> <li>• St George's is adjacent to the existing settlement of Edith Weston (a local service centre) and is some 6 miles from the higher order settlements of Oakham and some 7 miles to Stamford.</li> <li>• The information provided in the masterplan and other supporting evidence identifies a wide range of supporting infrastructure.</li> <li>• Further work is required in order to give certainty of delivery, including more detailed viability assessment.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• More detailed viability assessment.</li> </ul>	<ul style="list-style-type: none"> <li>• More detailed viability assessment.</li> </ul>
<b>Conclusions</b>	
<p>The NPPF supports new settlements that are well located and designed, and supported by the necessary infrastructure and facilities. The LPA can identify such sites in Local Plans and should:</p> <ul style="list-style-type: none"> <li>• Consider the opportunities to provide infrastructure, Economic potential and scope for net environmental gains;</li> <li>• Ensure the size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or to larger towns with good access;</li> <li>• Set clear expectations for design quality (following Garden Community principles), securing a variety of homes to meet needs</li> <li>• Make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation.</li> </ul> <p>The proposed size of the proposed new settlements is sufficient to support new communities and both have the potential to link to higher order services, facilities and employment in nearby settlements at Oakham and Stamford in the short term. In the longer term an element of self-containment is possible through the provision of employment, education, retail and social infrastructure.</p> <p>At this stage, both sites could be considered broadly consistent with National Policy in terms of the delivery of 'Larger scale development'. There is potential to clarify any areas where consistency is not clear.</p>	



Appendix 36 - Consistency with National Policy (Healthy lifestyles)	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• Section 8 of the NPPF seeks to promote healthy, inclusive and safe places.</li> <li>• No detailed 'Health Impact Assessment' has been submitted for Woolfox.</li> <li>• There are substantial areas accessible green infrastructure, sports facilities, allotments and layouts that encourage walking and cycling identified on the submitted masterplan (in accordance with para 91 of the NPPF).</li> <li>• There is potential to provide local shops with access to healthier food.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 8 of the NPPF seeks to promote healthy, inclusive and safe places.</li> <li>• St Georges is being promoted as a 'dementia friendly' development.</li> <li>• No detailed 'Health Impact Assessment' has been submitted for St George's.</li> <li>• The masterplan identifies green infrastructure, sports facilities, allotments and layouts that encourage walking and cycling (in accordance with the NPPF).</li> <li>• There is potential to provide local shops with access to healthier food.</li> </ul>
Further work	
<ul style="list-style-type: none"> <li>• A Health Impact Assessment could be provided if this is the preferred site at a more detailed stage of development.</li> <li>• The emerging masterplan and associated information could identify how the development has the potential to improve health.</li> </ul>	<ul style="list-style-type: none"> <li>• A Health Impact Assessment could be provided if this is the preferred site at a more detailed stage of development.</li> <li>• The emerging masterplan and associated information could identify how the development has the potential to improve health.</li> </ul>
Conclusions	
<p>The NPPF supports healthy and safe communities. Developments are encouraged to :</p> <ul style="list-style-type: none"> <li>• Promote social interaction;</li> <li>• Be safe and accessible;</li> <li>• Enable and support healthy lifestyles;</li> <li>• Provide the social, recreational and cultural facilities and services the community needs.</li> </ul> <p>Planning Practice Guidance was updated in July 2019 to encourage LPAs to plan positively to contribute to healthier communities. Criteria to improve health could be included in the Planning policies for the sites.</p> <p>The proposed new settlements both have the potential to deliver healthy, inclusive and safe places and both sites could be considered broadly consistent with National Policy in this regard. There is potential to identify how these issues are to be addressed as masterplans evolve.</p>	

Appendix 37 - Consistency with National Policy (Creating a strong economy)	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• Section 6 of the NPPF encourages building a strong, competitive economy.</li> <li>• The 'Economic benefits' statement has been provided for Woolfox which considers the impacts during and after development.</li> <li>• Some 27 ha of employment land is identified including employment sites for B-class uses and a proposed service area on the A1.</li> <li>• Some 2,100 jobs are proposed.</li> <li>• Other employment opportunities are identified in retail, education and health facilities that could be provided on site.</li> </ul>	<ul style="list-style-type: none"> <li>• Section 6 of the NPPF encourages building a strong, competitive economy.</li> <li>• An 'Employment Strategy' has been prepared that sets out how the proposed development will provide economic benefits.</li> <li>• Some 14 ha of employment land is identified including employment sites for B-class uses and a proposed service area on the A1.</li> <li>• Some 2,000+ jobs are envisaged including opportunities in retail, education and health facilities that could be provided on site.</li> </ul>
Further work	
<ul style="list-style-type: none"> <li>• More detailed analysis of the type of employment could be assessed at a future stage.</li> </ul>	<ul style="list-style-type: none"> <li>• More detailed analysis of the type of employment could be assessed at a future stage.</li> </ul>
<b>Conclusions</b>	
<p>Section 6 of the NPPF supports Building a strong, competitive economy. Planning policies are encouraged to :</p> <ul style="list-style-type: none"> <li>• Encourage sustainable economic growth</li> <li>• Identify strategic sites for local and inward investment</li> <li>• Address barriers to investment, such as inadequate infrastructure, and</li> <li>• Be flexible enough to accommodate needs not anticipated in the plan.</li> </ul> <p>The evidence provided for both sites supports the proposition that they have the potential to add to a strong and competitive economy through the provision of additional employment land and creation of additional jobs.</p>	

Appendix 38 - Consistency with National Policy (Boosting the supply of housing)	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• Paragraph 59 of the NPPF considers the Government's objective of significantly boosting the supply of homes.</li> <li>• The Sustainability Appraisal submitted for Woolfox indicates the potential to deliver up to 10,000 new homes in the longer term, with 2,500 homes in phase 1.</li> <li>• The proposed 'high level' trajectory indicates that the site could deliver the outstanding requirements for housing identified in the emerging Local Plan during the plan period.</li> </ul>	<ul style="list-style-type: none"> <li>• Paragraph 59 of the NPPF considers the Government's objective of significantly boosting the supply of homes.</li> <li>• The masterplan and trajectory for St George's indicates the potential to deliver some 2,215 new homes during the plan period.</li> <li>• The proposed trajectory indicates that the site could deliver the outstanding requirements for housing identified in the emerging Local Plan.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• A more detailed trajectory is required to confirm commencement teams (with realistic lead in times) and an assessment of viability.</li> </ul>	<ul style="list-style-type: none"> <li>• Assess the proposed delivery rates in terms of viability.</li> </ul>
<b>Conclusions</b>	
<p>Paragraph 59 of the NPPF considers the Government's objective of significantly boosting the supply of homes and delivering new homes lies at the heart of the Government's planning policies. Section 5 of the NPPF (2019) encourages LPAs to:</p> <ul style="list-style-type: none"> <li>• Provide a sufficient amount of land to meet need;</li> <li>• Provide sites to meet the needs of groups with specific housing requirements (such as affordable housing, families with children, older people, students, people with disabilities);</li> <li>• Provide a mix in terms of size, type and tenure;</li> <li>• Include a trajectory illustrating the expected rate of housing delivery over the plan period.</li> </ul> <p>The evidence provided for both sites indicates that they have the potential to accommodate the outstanding housing requirements. St George's has a more detailed trajectory. Both sites promote a mix of housing types including provision of 30% affordable housing.</p> <p>Both sites have the potential to be consistent with the NPPF in terms of boosting the supply of housing. Trajectories need to be challenged to ensure that lead in times and delivery rates are realistic and that the delivery rates are supported in the associated viability assessments.</p>	



Appendix 39 - Affordable Housing

Woolfox	St George's
<ul style="list-style-type: none"> <li>• The evidence relating to affordable housing for Woolfox is included in the Sustainability Appraisal and submitted viability assessment.</li> <li>• The evidence indicates the potential to deliver 30% affordable housing with 80% social rent and 20% shared ownership.</li> <li>• The high level viability assessment considers that the scheme is viable with the provision of a policy compliant provision of affordable housing.</li> </ul>	<ul style="list-style-type: none"> <li>• The evidence relating to affordable housing for St George's is included in the evolving Masterplan.</li> <li>• The evidence indicates the potential to deliver 30% affordable housing with 50% affordable rent and 35% starter homes or other affordable home ownership products and 15% rent to buy.</li> <li>• Higher percentages (40% are proposed in the higher density parts of the site)</li> <li>• The viability assessment considers that the scheme is viable with the provision of a policy compliant provision of affordable housing.</li> </ul>
<b>Further work</b>	
<ul style="list-style-type: none"> <li>• A more detailed and independent assessment of viability is required in relation to delivering a policy compliant provision of affordable housing.</li> <li>• Identifying a preferred delivery partner if the site is identified as a preferred option.</li> </ul>	<ul style="list-style-type: none"> <li>• A more detailed and independent assessment of viability is required in relation to delivering a policy compliant provision of affordable housing.</li> <li>• Identifying a preferred delivery partner if the site is identified as a preferred option.</li> </ul>
<b>Conclusions</b>	
<p>Paragraph 34 of the NPPF indicates that 'Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing...'</p> <p>Paras 61 to 64 of the NPPF encourage LPAs to provide sites to meet the needs of groups with specific housing requirements including affordable housing. Where a need is identified LPAs are encouraged to identify tenure.</p> <p>The evidence provided for both sites indicates that they have the potential to accommodate a policy compliant 30% affordable housing. Both sites have the potential to be consistent with the NPPF in terms of delivering affordable housing. An independent assessment of the viability implications of delivering the requisite amount of affordable housing is required.</p>	

Appendix 40 - Maintaining Strategic gaps between settlements and protecting local character	
Woolfox	St George's
<ul style="list-style-type: none"> <li>• The masterplan for Woolfox shows substantial distance separation between the small settlements of Clipsham and Stretton.</li> <li>• No adverse implications have been identified in terms of potential coalescence.</li> </ul>	<ul style="list-style-type: none"> <li>• The masterplan for St George's shows the physical relationship between the proposed development and Edith Weston.</li> <li>• A substantial gap is maintained between the proposed development and North Luffenham.</li> <li>• The masterplan indicates that the strategic gap that currently exists between the village of Edith Weston and the built form associated with St George's barracks will be retained through the siting of a village green and school playing fields.</li> <li>• The masterplan indicates that the proposals could potentially be delivered without coalescence. Careful design and masterplanning would be able to mitigate any adverse implications in terms of relationship of existing and new development (particularly in light of the existing relationship between Edith Weston and St George's Barracks).</li> </ul>
Further work	
<ul style="list-style-type: none"> <li>• If the site is identified as a preferred option, monitoring of any amendments to the submitted masterplan will be required.</li> <li>• A policy requirement for a masterplan is recommended.</li> </ul>	<ul style="list-style-type: none"> <li>• If the site is identified as a preferred option, monitoring of any amendments to the submitted masterplan will be required.</li> <li>• If the site is proposed as a preferred option, consideration should be given to designating 'strategic gaps / Areas of Separation' between the settlements of Edith Weston and North Luffenham and the proposed extent of built development.</li> <li>• A policy requirement for a masterplan is recommended.</li> </ul>
Conclusions	
<p>Avoiding the coalescence of settlements are a longstanding objective of the planning system.</p> <p>No coalescence or visual adverse implications for strategic gaps have been identified for the Woolfox proposal.</p>	

The St George's proposal has greater potential for coalescence given the relative proximity of the proposal and the existing village of Edith Weston. However, there is already built development associated with the use of the site for military purposes and the emerging masterplan indicates that strategic gaps will be retained between the proposed development and existing village.

The evidence provided for both sites indicates that they could be delivered without significant adverse impacts on strategic gaps and coalescence. Both sites have the potential to be justified and effective in this respect.

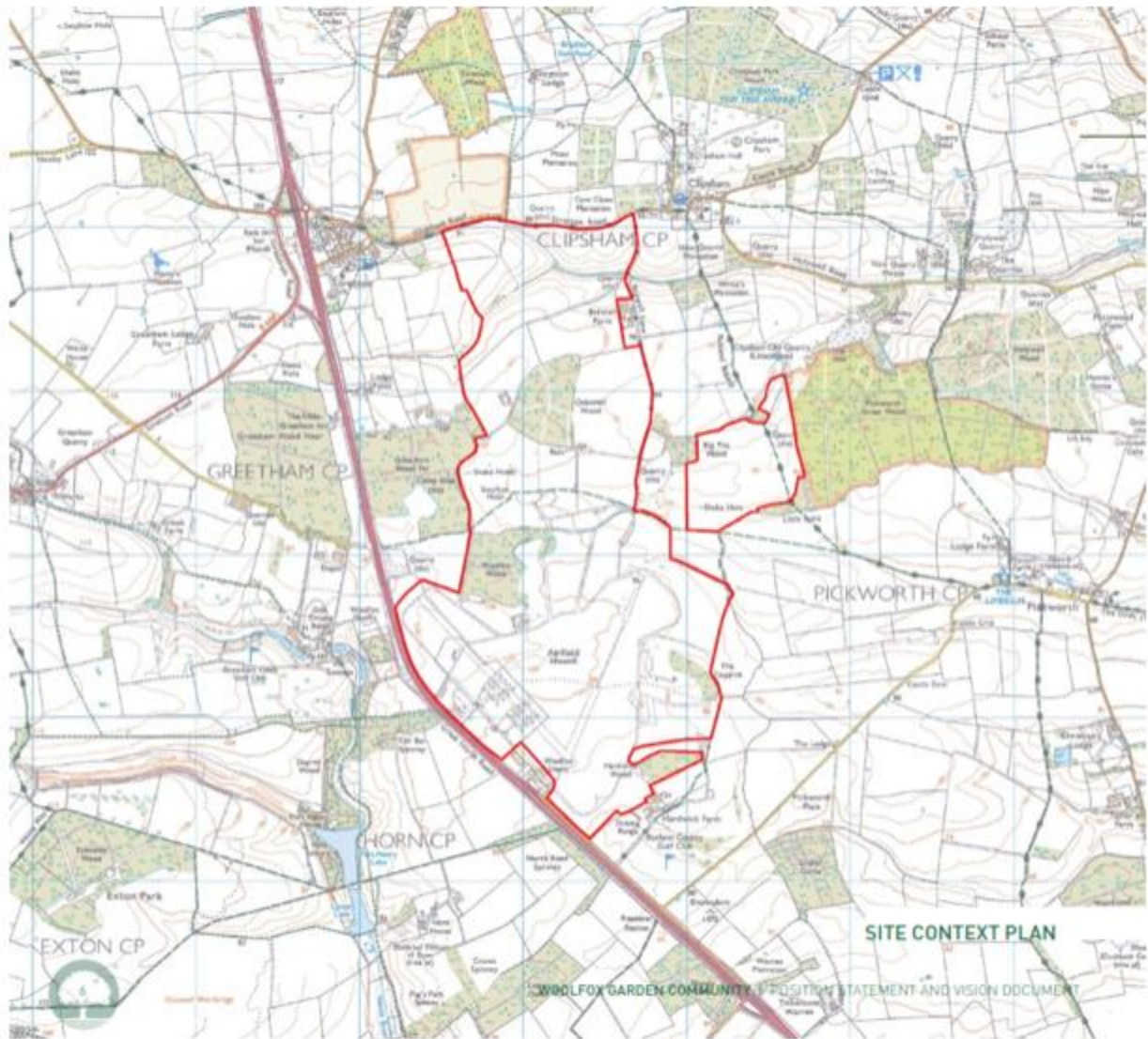
Appendix 41 - Scale in comparison with host settlement	
Woolfox	St George's
<ul style="list-style-type: none"> <li>The masterplan for Woolfox shows there is no 'host' settlement with the nearest villages of Clipsham and Stretton being located some distance away.</li> <li>No adverse implications have been identified in terms of implications for a host settlement.</li> </ul>	<ul style="list-style-type: none"> <li>The masterplan for St George's shows the close proximity to Edith Weston (A Local Service Centre).</li> <li>The population of the Civil Parishes of Edith Weston and North Luffenham is some 2,000 (according to the 2011 census).</li> <li>The current Barracks area currently contains houses occupied by military and non-military occupants. The population fluctuates largely depending on the military regiment. The Military Working Dog Regiment currently occupies the site.</li> <li>The emerging preferred development of some 2,215 is modest given the scale of the site. Based on standard occupancy rates of 2.4 people per dwelling, a population of some 5,000 people could result.</li> <li>There are some existing services and facilities in Edith Weston that would help to support the growing population in the early years of development.</li> </ul>
Further work	
<ul style="list-style-type: none"> <li>No further work is identified.</li> </ul>	<ul style="list-style-type: none"> <li>Sensitive design and masterplanning to reduce visual impacts on Edith Weston and North Luffenham and timely delivery of infrastructure to reduce social impacts.</li> </ul>
Conclusions	
<p>The NPPF does not specifically refer to the scale of development in relation to a host settlement. However, it is a longstanding objective of the planning process to ensure that the scale of new development is not disproportionate. Paragraph 127 of the NPPF seeks to ensure that developments:</p> <p>“ c) are sympathetic to local character and history, including the surrounding built environment and landscape setting....”</p> <p>Both proposals promote delivery of 'New Villages'. There is a closer functional relationship between the proposed development at St George's and Edith Weston (and a lesser extent North Luffenham). Edith Weston could act as a 'host' settlement in the early years of development. Sensitive design and masterplanning would allow St George's to operate as a freestanding village at its full extent.</p> <p>There is already built development and population associated with the use of the site for military purposes. However, the scale of proposed development (c.2,215 houses / 5,000 population) is larger</p>	

than Edith Weston at present. The impacts will largely depend on the timing and delivery of associated infrastructure.

No issues have been identified for either site would not be justified in terms of scale in comparison with host settlement. The St George's site clearly has a closer functional relationship with the settlements of Edith Weston and North Luffenham. The impacts on these settlements can be mitigated through limiting the scale and extent of growth and delivering the necessary infrastructure in a timely fashion.

Assuming sensitive design, masterplanning and timely delivery of infrastructure, both site could be considered 'justified' and 'effective' options.

## Appendix 42 - Woolfox site plan



# Appendix 43 – St George’s site plan

