

## Response to the Draft High-Level Master Plan for St George's Barracks

### Overview

CPRE Rutland welcomes the opportunity to comment on the draft Master Plan for St George's. In principle, we are supportive of the Council's approach to take control of the future development of the site rather than leave it to developers or to risk it becoming derelict. This approach should allow for the creation of a solution which meets the needs of the county and which can be seen as a useful contribution to Rutland's future. We are concerned, however, that there seems to have been no effective consideration of the wider impact of the proposed development across the county, or of the many possible alternative uses suggested for the site, and we have serious questions regarding the essential basis of the plan, particularly in that it would appear to contravene a number of existing RCC policies, and over certain aspects of the process to date to develop it. More specifically, we believe that the scale of housing proposed is far in excess of the needs of our essentially rural county and, if delivered, would have serious adverse impacts far outweighing any benefits which might derive. A more modest housing development, possibly realised through the sort of phased approach currently being discussed within the parish council community, together with some more imaginative features and facilities, would seem to offer a much more appropriate and acceptable ambition and, we feel, should be considered carefully in place of the current plan. These issues are expanded in our more detailed comments below.

### The Need for a Strategic Vision

As we have previously commented in correspondence with RCC, the lack of any sort of strategic vision for the county is a significant obstacle to the acceptability of the plan. This really must be redressed as a matter of urgency. It needs to set out what sort of county we should aim to be and identify how the county might evolve over the coming years, as well as considering how Rutland will need to integrate effectively into the wider East Midlands community as it too evolves. In the context of such a vision, it should be possible to assess the merits of different options for the St George's site and thus engender local support for them.

### Lack of any Evidence of Housing Need

The current draft local plan for Rutland is based on an identified housing need (the OAN) of 1503 new dwellings by 2036. This figure will be revised down by some 20% when the new government formula for OAN is applied. As far as we can see, the council has not, as yet, provided any evidence of any greater need - it is certainly not apparent in the draft plan document - and, as current build-out rates in Rutland comfortably exceed the established need, it is hard to see how any additional development can be justified. Although it is acknowledged that the NPPF does not limit development to the OAN figure, CPRE has consistently urged authorities not to conflate housing demand with housing need, in order to ensure that houses can be made available to those who

genuinely are in need of housing, rather than merely satisfying market-led demands from developers seeking to maximise profits or from those who simply aspire to, and can afford to, live in larger homes. A clear statement of the real need for new houses in Rutland, based on an agreed statement of the vision for the county, is required before any of the proposals can gain our or widespread community approval.

## **Appropriate Scale and Character of Development**

The proposed development, of up to 3,000 homes at the western side of the site, together with a further development of 500 homes to the east, is far greater than can be justified. From the aerial views in the plan document, it appears to cover an area roughly twice that of the current barracks, taking over the golf course and a significant area of greenfield land. We believe that much of the green field area of the site is currently in use for agriculture and, as there appears, therefore, to have been no material change in use, we would expect this land to be offered to the previous landowners under the Crichel Down rules before any plans could legitimately be made for alternative uses. It would be contrary to natural justice for the MoD to be seen to make significant gains from the disposal of land previously requisitioned for military purposes.

The proposed development does not comply with extant RCC policies. In particular, RLP8 in the draft local plan concerns the reuse of military sites and requires, amongst other things, that such proposals:

- minimise developments on undeveloped land
- protect and enhance the countryside
- do not generate unacceptable levels of traffic (see below for our further comments regarding traffic levels), and
- be accessible by public transport.

Should the current plan actually be implemented, the result would be a town larger than Uppingham. Given that there are just two market towns in the county at present, imposing a third town would clearly have a major impact not only across the county as a whole, but in the neighbouring regions as well. This would likely severely diminish the essentially rural nature of the county and compromise much that Rutlanders hold dear, as well as being to the severe detriment of the immediately surrounding villages. With so much new development, both residential and commercial, already in train in the surrounding counties, as well as in Rutland itself, it is hard to see why much of the unique character of our county needs to be sacrificed on the altar of unjustifiable housebuilding demands.

Preservation of the character of the county's built environment would be far better served by one, or possibly more, small villages of just a few hundred dwellings. Building style and materials are important, as is highlighted in the draft plan (Section 5.0), although the statement that 'recent developments have failed to reflect local built character ...' seems to be a fairly damning indictment of the performance of RCC's planning department, and this must be redressed urgently if there is to be a realistic level of confidence that RCC can actually deliver a satisfactory outcome.

We would expect that housing targets in other areas of the county identified in the current draft local plan will be revised down to compensate fully for any development at St George's.

## **Consultation Process Flawed**

From the presentations made by RCC and MoD to date, it is clear that there has been no effective consultation on alternative uses for the site. Comments such as 'nothing ruled in, nothing ruled out' in slides presented in April and July 2017 suggest that no decisions had at that time been taken, while the presentation in September 2017, which appeared to herald the opening of community consultation, offered only the solution embodied in the current draft master plan. The many suggestions recorded from the consultation sessions in January 2018, furthermore, do not seem to have been taken any further at all. Also, Section 3.0 of the plan document suggests that just three fairly similar looking and unimaginative options were considered for the site, but gives no details of them, and then states quite clearly that Option 3 was selected through discussion between RCC and MoD. Given that the MoD will be relinquishing its interests in the site, it seems quite wrong that its influence over the future plans should take precedence over the views of the residents of Rutland. The draft master plan and the accompanying feedback form thus seem to have been produced to seek comments solely on the detail of a predetermined option; this has, not unnaturally, been met with widespread, almost universal opposition and condemnation across the county. This must be redressed through meaningful public consultation as soon as possible.

## **Transport Assessment**

The high level transport assessment seems to concentrate principally on the possible impact on certain road junctions but does highlight relevant extant RCC transport policies. Total traffic need is hard to discern from the report, but we note that a more detailed assessment is recommended. We suspect that the traffic movements generated by the proposed development are likely to swamp the existing infrastructure. 3,000 homes would potentially account for some 6,000 cars, while the anticipated business activity, providing jobs for 3,000 people, would generate further traffic movement in terms of both travelling to and from work and that needed to sustain the business operations. To put it another way, it is difficult to see the sort of traffic levels currently evident through Oakham and Uppingham (towns of comparable size to that proposed) being easily accommodated on the roads around Edith Weston and North Luffenham. Additionally, over a protracted period, there would be some 80 HGV movements per day (according to the transport report) to support construction as well as an unspecified number supporting the quarrying activity.

RCC's minimum requirements for parking and parking spaces per home are not realistic in an environment in the countryside such as this, with little transport infrastructure, which relies on a questionably viable bus service. The statistic that young people do not travel by car is skewed by the fact that the majority of working young people are in the cities where transport infrastructure is present and convenient. In this local environment, vehicles of some description will be required for many years yet for people to get to work, carry children, shopping and get to social activities. The statement, in Section 6.0, that "public transport will play a major role in helping to reduce the levels

of road-based journeys” is thus highly questionable, and, in any case, is scarcely supported by the minimal improvements to local bus services suggested.

Most couples who are working need a car each and that means that a two or three bedroom house will have a need for two cars, and a four bedroom house (perhaps with a young adult living at home) will need at least three. This is more than the minimum mentioned by RCC. Therefore sufficient parking and road widths are necessary to avoid the situation as on the Barleythorpe estate, where cars are parked on the pavements and opposite each other, causing congestion and cluttering the streets.

It is of concern that the proposed development would contravene extant RCC policies in a number of significant respects. In particular:

- **Policy HT3** - Location: Planning permission will be granted for development which: i) is in close proximity and with good access to related land uses; ii) is in locations minimising the need to travel in terms of the journey quantity and distance; iii) would not be detrimental to environmental, amenity and highway considerations; iv) is in locations which facilitates alternative forms of transport to the private car; and; v) in the case of major development has good access to the specified road network.
- **Policy HT4** - Traffic Increase: Planning permission will not be granted for any development which would be likely to result in an increase in traffic, particularly heavy vehicles and /or parking, on roads unsuited to such usage, if it would: i) result in unacceptable levels of congestion; ii) be a road safety hazard; iii) be detrimental to the amenity of surrounding properties and the locality, or; iv) be detrimental to the environment.
- **Policy RLP8** – Reuse of Redundant Military Facilities: see our comments above under Appropriate Scale and Character of Development.

The emphasis on walking and cycling is to be welcomed.

## **Environmental Impact**

The draft plan asserts that there should be little need for ecological constraint or compensation for loss of diversity. This may be so with respect to the currently built areas but surely not so in the green space areas which are to be developed. There are, of course, many other environmental issues to be addressed, including noise, light and air pollution, as well as waste disposal resulting from increased business and residential activity together with consequent increases in road transport. The risk of water run-off affecting Rutland Water should be a further consideration. The master plan does not presently deal with any of these important issues.

## **Recommended Way Ahead**

CPRE Rutland strongly recommends serious consideration of and consultation on alternative uses, such as scientific or educational facilities, a leisure or even a national park, or a major health centre, together with a much smaller housing development to create a village in the character of many of Rutland's existing villages, and in keeping with the agreed policies in the local plan. Popular support for the eventual solution is regarded as essential if it is to succeed and would need to be consistent with the government's localism agenda as well as relevant planning policies.

We suggest, therefore, that the process should start with a draft statement of the vision for the county over the next 30 or so years, supported by sufficiently detailed analysis of the need for further development, in terms of employment, recreational and leisure facilities, transport and service infrastructure and then housing, and taking full account of infrastructure and other developments in neighbouring counties. This should then be opened to consultation across the county to secure community buy-in to the vision and to identify credible uses for the St George's site. The options for the site should then be subjected to more detailed scrutiny to determine what would be in the best interests of Rutland. We urge RCC to address these shortcomings before any further work is undertaken to develop a master plan.

CPRE Rutland would be happy to support RCC working along the lines suggested above in developing an acceptable plan for the future of St George's, which accords with agreed planning policies and which meets the real needs of Rutland.

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