

Shropshire Local Plan Examination

Shropshire Council Response to:

**ID40: Stage 2 Matters, Issues and
Questions**

Matter 6



Matter 6 – Strategic settlements (policy S19) – See MMs 124-125

Issue: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall approach to strategic settlements.

Questions - Policy S19 – Clive Barracks, Tern Hill:

Question 1. *Is the amended policy justified effective and consistent with national planning policy?*

Shropshire Council Response:

- 1.1. Yes, Shropshire Council considers that the Strategic Settlement at Clive Barracks, Tern Hill and the associated amended draft Policy S19 (see proposed main modifications in GC4m) are justified, effective and consistent with national planning policy.
- 1.2. Identification of this proposed allocation was informed by a proportionate and robust site assessment process, the conclusions of which informed the requirements of draft Policy S19.
- 1.3. This assessment process and conclusions reached are summarised in the updated Additional Sustainability Appraisal Report (GC44). It was informed by analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers; and technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39).
- 1.4. Identification of the proposed allocation and development of draft Policy S19 were also informed by technical assessment undertaken through the Sustainability Appraisal (SD006.01-SD006.22), Habitats Regulations Assessment (SD008.01-SC008.03), and Equality and Social Inclusion Impact Assessment (SD010); and the wider evidence base prepared to inform the draft Shropshire Local Plan.
- 1.5. They were also subject to and informed by both Regulation 18 (Plan-Making) and Regulation 19 (Pre-Submission) consultations; and proactive engagement through the Clive Barracks Task Force Group (a group of local stakeholders, chaired by the then MP for North Shropshire).
- 1.6. As such, Shropshire Council considers the Strategic Settlement at Clive Barracks, Tern Hill and the associated amended draft Policy S19 (see proposed main modifications in GC4m) to be fully justified.

- 1.7. Shropshire Council considers draft Policy S19 is 'effective' as it provide a framework to maximise the potential benefits of the sites redevelopment, whilst also achieving appropriate protection of assets and mitigation of impacts. Specifically, it:
 - a. Provides a clear and appropriate overarching strategy.
 - b. Provides detailed policy requirements for masterplanning, phasing, and future redevelopment - supported by the policy requirements within the wider draft Shropshire Local Plan.
 - c. Incorporates appropriate proposed modifications (see proposed main modifications in GC4m) which respond to discussions during stage 1 hearings and the Inspectors conclusions in ID28.
 - d. Is supported by a detailed policy explanation which incorporates proposed modifications (see proposed main modifications in GC4m) which respond to discussions during stage 1 hearings and the Inspectors conclusions in ID28.
- 1.8. Shropshire Council would note proposed modifications to draft Policy S19 and its explanation have been informed by proactive engagement with the site promoter and have been endorsed by them within the two updated Statements of Common Ground between the two parties (SoCG04a and SoCG04b).
- 1.9. Shropshire Council considers draft Policy S19 is 'consistent with national policy'. In particular:
 - a. As a predominantly brownfield site, it will support the intention of making use of brownfield land in paragraph 119 of the NPPF.
 - b. It will positively contribute to the achievement of local housing need and the needs of specific groups in our communities, consistent with paragraphs 60-63 of the 2021 National Planning Policy Framework (NPPF).
 - c. It will support economic growth and productivity, taking into account both local business needs and wider opportunities for development, consistent with paragraphs 81-83 of the NPPF.
 - d. It will support the formation of a sustainable community, with opportunities for positive social interaction and a healthy lifestyle, consistent with paragraphs 92-93 of the NPPF.
 - e. It is well located and will be supported by necessary infrastructure and facilities, consistent with paragraph 73 of the NPPF.
 - f. Detailed policy requirements will support achievement a sustainable and well-designed development, consistent with paragraphs 8 and 129-130 of the NPPF. They will also support other aspirations, such as:
 - i. Protection and enhancement of open space and green infrastructure, consistent with paragraphs 98-99 of the NPPF.

- ii. Provision of social infrastructure, consistent with paragraphs 34 and 95-96 of the NPPF.
- iii. Maximising opportunities for use of sustainable transport – walking, cycling and public transport, consistent with paragraphs 104-106 of the NPPF.
- iv. Provision of appropriate improvements to the highway network, consistent with paragraph 113 of the NPPF.
- v. Provision of sustainable drainage, consistent with paragraph 169 of the NPPF.
- vi. Conservation of ecological assets, consistent with paragraph 174 of the NPPF.
- vii. Consideration of noise, odour and contaminated land, consistent with paragraphs 183-185.
- viii. Protection of the setting of heritage assets, consistent with paragraph 189 of the NPPF.
- g. It will avoid an adverse impact on operational defence sites, consistent with paragraph 97(b) of the NPPF.

Question 2. *Is the housing trajectory for the site realistic and deliverable?*

Shropshire Council Response:

- 2.1. Shropshire Council considers the proposed housing delivery trajectory for the Clive Barracks, Tern Hill Strategic Settlement in the assessment of the housing land supply in Shropshire, as summarised in document GC47, is generally realistic and deliverable.
- 2.2. However, since publication of GC47, Government has confirmed the disposal date for Clive Barracks, which will occur in 2030. This is a year later than assumed by the Council in GC47. As a result, the Council considers the total number of dwellings developable on this site in the proposed plan period will reduce from 350 dwellings to 300 dwellings. This 50 dwelling reduction occurs beyond the proposed five year housing land supply period and is not considered to have a significant impact on the conclusions reached in GC47.
- 2.3. Through continuing discussions with the site promoter, it has been confirmed that they remain committed to the disposal of the site and its redevelopment. Through these discussions, the site promoter has also confirmed that they are in agreement with the Council, regarding updated assumptions on delivery timescales and rates documented above. This is reflected within the most recent updated Statements of Common Ground between the two parties (SoCG04b).

The updated delivery trajectory for the site is summarised in Table 2.1 below:

Table 2.1: Housing Delivery Trajectory

	Years 1-5					Years 6 - 10				
	2023 / 24	2024 / 25	2025 / 26	2026 / 27	2027 / 28	2028 / 29	2029 / 30	2030 / 31	2031 / 32	2032 / 33
Activity:					Outline Planning Application	Outline Planning Application and Site Closure Works	Site Closure Works and Disposal	Disposal / Reserved Matters Application	25	25
	Years 11-15					Total to 2038	Total beyond 2038			
	2033 / 34	2034 / 35	2035 / 36	2036 / 37	2037 / 38					
Activity:	50	50	50	50	50	300	450			

- 2.4. In order to positively respond to concerns raised by the Inspectors in ID28, the Council has continued to proactively engage with the site promoter. Through this engagement two updated Statements of Common Ground between the two parties have been completed (SoCG04a and SoCG04b) which complement the initial submitted Statement of Common Ground (SoCG04).
- 2.5. SoCG04, SoCG04a and SoCG04b demonstrate the site is viable and deliverable and that the infrastructure necessary to serve future occupants will be delivered at the appropriate stages in the delivery of this site.
- 2.6. Further confidence on this matter is provided through proposed modifications to draft Policy S19, which include a requirement to prepare a phasing strategy, which will ensure timely delivery of facilities and infrastructure.
- 2.7. With specific regard to assumptions on delivery timescales, Shropshire Council would note:
 - a. Delivery timescale assumptions are not a result of concerns about site viability or deliverability, but reflect the timing of site disposal (Government has confirmed this will occur in 2030).
 - b. Delivery timescale assumptions have been informed by and recognise the need to deliver necessary infrastructure at appropriate stages of the development.

- c. Delivery timescale assumptions have been discussed and agreed with the site promoter. This is documented within the SoCG004b.
- 2.8. As also documented within SoCG04, SoCG04a and SoCG04b, the promotion of the site and the Indicative Masterplan that has been prepared have been informed by a suite of technical evidence. This technical evidence provides confidence that infrastructure will be delivered at appropriate points within the development project.
- 2.9. SoCG04a includes *"The evidence prepared for the site provides a significant understanding of necessary timescales for delivery of the infrastructure required to facilitate delivery of the site."*
- 2.10. SoCG04b includes *"The extensive work undertaken to date has enabled an understanding of costs associated with the delivery of the scheme to a level which would not normally be known at this stage of plan making. The DIO and the Council remain committed to ongoing discussions regarding costs as both the market and costs associated with delivery will continually evolve over the lifetime of the site delivery. At this stage, the parties are comfortable that Clive Barracks will be able to deliver a policy compliant scheme."*

Question 3. *Have the infrastructure requirements of the proposed strategic settlement been adequately identified and costed? Including the requirements for:*

- a) road improvements*
- b) air quality mitigation measures*
- c) sustainable transport networks*
- d) the primary school*
- e) healthcare*
- f) green infrastructure*
- g) leisure and sports facilities*
- h) local centre facilities*
- i) contamination remediation.*

Shropshire Council Response:

- 3.1. Yes, Shropshire Council considers the infrastructure requirements of the proposed Strategic Settlement: Clive Barracks, Tern Hill have been adequately identified and costed. These infrastructure requirements are reflected within draft Policy S19 and further detail is provided within the draft policy explanation (see proposed main modifications in GC4m).
- 3.2. This understanding has been informed by the proportionate and robust site assessment process, undertaken to inform identification of proposed allocations. This considered the opportunities and

constraints associated with sites and subsequently informed identification of infrastructure requirements for proposed allocations.

- 3.3. The site assessment process was informed by analysis undertaken by Highways, Heritage, Ecology, Tree, and Public Protection Officers; and technical studies such as Sustainability Appraisal, Landscape and Visual Sensitivity Study (EV071), and Strategic Flood Risk Assessment (Level 1 and Level 2) (EV095.01-EV095.66 and EV096.01-EV096.39). The conclusions reached are summarised in the updated Additional Sustainability Appraisal Report (GC44).
- 3.4. This understanding has also been informed by the wider evidence base prepared to inform the draft Shropshire Local Plan. This included studies such as the Green Infrastructure Strategy (EV052.01-EV052.30), Indoor Sports Facilities Strategy (EV064.01-EV064.02) Strategic Infrastructure and Investment Plan and Place Plans (GC4t and EV067.01- EV067.18 respectively), Open Space Needs Assessment (EV088.01-EV088.05), Playing Pitch and Outdoor Sports Strategy (EV089.01-EV089.03) and Water Cycle Study (EV117.01-EV117.03).
- 3.5. Importantly, this understanding has also been informed by proactive engagement with the site promoter and due consideration of the evidence prepared by them in support of their site promotion, as summarised within the Statements of Common Ground between Shropshire Council and the site promoter (SoCG04, SoCG04a and SoCG04b).
- 3.6. SoCG04a includes significant detail regarding the evidence prepared in support of the site promotion (see paragraphs 3.3-3.46 of SoCG04a). This evidence includes topographical surveys; a highways report and technical note; noise assessment; flood risk and drainage scoping; foul water and utilities assessment; preliminary ecological appraisal; landscape and visual impact assessment; heritage statement and geophysical survey; arboricultural survey and preliminary impact assessment; unexploded ordinance assessment; and phase 1 ground investigations. Paragraphs 3.47-3.50 of SoCG04a then explain the consideration of on-site infrastructure requirements undertaken.
- 3.7. Paragraphs 3.1 and 3.2 of SoCG04a explain that this evidence *"considers on and off-site constraints and necessary infrastructure and mitigation required to deliver the scheme"* and confirms that *"a scheme of 750 dwellings, 5.75 hectares (ha) of employment land, a range of local services and facilities, necessary infrastructure and extensive green open space is deliverable."*
- 3.8. Specifically with regard to affordable housing, paragraph 2.8 of SoCG04a states *"The DIO and Council are in agreement that the delivery of affordable housing both within the plan period and post*

plan period will be appropriately phased and agreed through further discussion and by a comprehensive phasing strategy which will be prepared for the site at planning application stage (as proposed through the amended policy wording) and also through any further discussions (if necessary). Affordable housing will be delivered within the proposed Plan period and beyond at appropriate stages of the development and in line with other new infrastructure to be delivered onsite."

- 3.9. SoCG04b provides further detail on each of the infrastructure categories raised in this question, in paragraphs 3.1-3.24. It confirms that *"The extensive work undertaken to date has enabled an understanding of costs associated with the delivery of the scheme to a level which would not normally be known at this stage of plan making. The DIO and the Council remain committed to ongoing discussions regarding costs as both the market and costs associated with delivery will continually evolve over the lifetime of the site delivery. At this stage, the parties are comfortable that Clive Barracks will be able to deliver a policy compliant scheme."*
- 3.10. This understanding has also been informed by discussions with infrastructure providers, the conclusions of which are summarised in the Place Plans (EV067.01-EV067.18) and Strategic Infrastructure and Investment Plan (most recent iteration GC54).
- 3.11. Public consultation Regulation 18 (Plan-Making) and Regulation 19 (Pre-Submission) and proactive engagement with communities through the Clive Barracks Task Force Group (a group of local stakeholders, chaired by the then MP for North Shropshire) have also informed the Council's understanding of infrastructure requirements.
- 3.12. The infrastructure requirements identified through these processes have informed the requirements of draft Policy S19, which will inform preparation of the phasing strategy and masterplan for the site. They will also inform the subsequent Planning Application process and ultimately redevelopment of the site.
- 3.13. Within the Strategic Infrastructure and Investment Plan (most recent iteration GC54), the Council has where possible identified costings and funding mechanisms for the infrastructure requirements associated with development proposals, including the Clive Barracks, Tern Hill.
- 3.14. Crucially, draft Policy DP25 unambiguously establishes the Council's approach to funding the infrastructure necessary to support development in Shropshire. This provides certainty for developers, communities and decision makers. It also provides confidence that the infrastructure necessary to support development will be delivered at appropriate times within the development process.

Question 4. *Is there evidence that the infrastructure requirements will be delivered within the necessary timescales?*

Shropshire Council Response:

- 4.1. Statements of Common Ground (SoCG04, SoCG04a and SoCG04b) have been completed between Shropshire Council and the promoter of Clive Barracks, Tern Hill. These documents demonstrate the site is viable and deliverable. They also demonstrate that the infrastructure necessary to serve future occupants will be delivered at appropriate stages in the delivery of this site.
- 4.2. In particular, SoCG04a includes significant detail regarding the evidence prepared in support of the site promotion, which demonstrates this proposed allocation will be capable of supporting the necessary infrastructure and services planned (see paragraphs 3.3-3.46 of SoCG04a).
- 4.3. This evidence includes topographical surveys; a highways report and technical note; noise assessment; flood risk and drainage scoping; foul water and utilities assessment; preliminary ecological appraisal; landscape and visual impact assessment; heritage statement and geophysical survey; arboricultural survey and preliminary impact assessment; unexploded ordinance assessment; and phase 1 ground investigations.
- 4.4. Paragraphs 3.47-3.50 of SoCG04a then explain the consideration of on-site infrastructure requirements that has been undertaken and reflected within the requirements of draft Policy S19.
- 4.5. Paragraphs 3.1 and 3.2 of SoCG04a explain that this evidence *"considers on and off-site constraints and necessary infrastructure and mitigation required to deliver the scheme"* and confirms that *"a scheme of 750 dwellings, 5.75 hectares (ha) of employment land, a range of local services and facilities, necessary infrastructure and extensive green open space is deliverable."*
- 4.6. Specifically with regard to affordable housing, paragraph 2.8 of SoCG04a states *"The DIO and Council are in agreement that the delivery of affordable housing both within the plan period and post plan period will be appropriately phased and agreed through further discussion and by a comprehensive phasing strategy which will be prepared for the site at planning application stage (as proposed through the amended policy wording) and also through any further discussions (if necessary). Affordable housing will be delivered within the proposed Plan period and beyond at appropriate stages of the development and in line with other new infrastructure to be delivered onsite."*

- 4.7. SoCG04b provides further detail on key infrastructure requirements, in paragraphs 3.1-3.24. It confirms that *"The extensive work undertaken to date has enabled an understanding of costs associated with the delivery of the scheme to a level which would not normally be known at this stage of plan making. The DIO and the Council remain committed to ongoing discussions regarding costs as both the market and costs associated with delivery will continually evolve over the lifetime of the site delivery. At this stage, the parties are comfortable that Clive Barracks will be able to deliver a policy compliant scheme."*
- 4.8. Proposed modifications to draft Policy S19 provide further certainty on this matter, as they include a requirement to prepare a phasing strategy, which will ensure timely delivery of facilities and infrastructure.
- 4.9. These proposed modifications are addressed within SoCG04a, which concludes at paragraph 4.3 that *"A comprehensive phasing strategy will be prepared, which will ensure the timely delivery of the site's facilities and infrastructure. The phasing strategy will also cover the timely phasing of affordable housing onsite. Shropshire Council and DIO are committed to ongoing discussions and joint working to achieve an appropriate phasing strategy to ensure that the site delivers as per the housing trajectory."*
- 4.10. They are also addressed within SoCG04b, which concludes at paragraphs 4.2-4.3 that *"Main Modification MM124 now ensures that the phasing of the development remains a key consideration requiring the preparation of a comprehensive phasing strategy to be submitted with a future planning application. Shropshire Council and DIO are committed to ongoing discussions and joint working to achieve an appropriate phasing strategy to ensure that the site delivers as per the housing trajectory."*
- 4.11. Other draft policies in the draft Shropshire Local Plan provide further certainty about the timely provision of the infrastructure necessary to support development. In particular draft Policy DP25 includes *"New development should only take place where there is sufficient existing infrastructure capacity available. Where a new development would lead to a shortfall in infrastructure provision, the development will be required to fund necessary improvements through a suitable developer contribution, unless the identified shortfall is being addressed by other means."*
- 4.12. The requirement of draft Policy S19 and its explanation (see proposed main modifications in GC4m) clearly establish the infrastructure requirements for the site and where it is considered necessary and appropriate also provide an indication of necessary timescales for the delivery of infrastructure. These requirements will inform the phasing strategy and further masterplanning for the site.

They will also inform the subsequent Planning Application process and ultimately redevelopment of the site.

- 4.13. Importantly, the Planning Application process will also allow for the detailed consideration of and establish the specific phasing for the delivery of infrastructure to ensure it is provided at an appropriate time during the sites redevelopment – directly informed by the phasing strategy to be prepared for the site and relevant policies within the draft Shropshire Local Plan (particularly draft Policies DP25 and S19).
- 4.14. Within the Planning Application process, infrastructure requirements and timescales for delivery will be secured as appropriate via such mechanisms as planning conditions, S106 legal agreements and Community Infrastructure Levy (CIL) contributions.
- 4.15. As such, Shropshire Council considers the delivery timescales for Clive Barracks, Tern Hill have been appropriately informed by the consideration of necessary supporting infrastructure and there is confidence that necessary infrastructure will be delivered and at an appropriate time within the construction process.