

Shropshire Local Plan 2016- 2038 Stage 2 Hearing Statement

Matter 6 – Strategic Sites

Land at Clive Barracks

Prepared by Fisher German on behalf of the Defence
Infrastructure Organisation

Project Title

Land at Clive Barracks, Tern Hill, Shropshire

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1. Introduction

- 1.1 These representations have been prepared by Fisher German on behalf of the Defence Infrastructure Organisation (DIO) in respect of Ministry of Defence land at Clive Barracks, Tern Hill, as illustrated at Figure 1 below.
- 1.2 Clive Barracks is a proposed Strategic Settlement allocation within the emerging Local Plan under Policy S19.

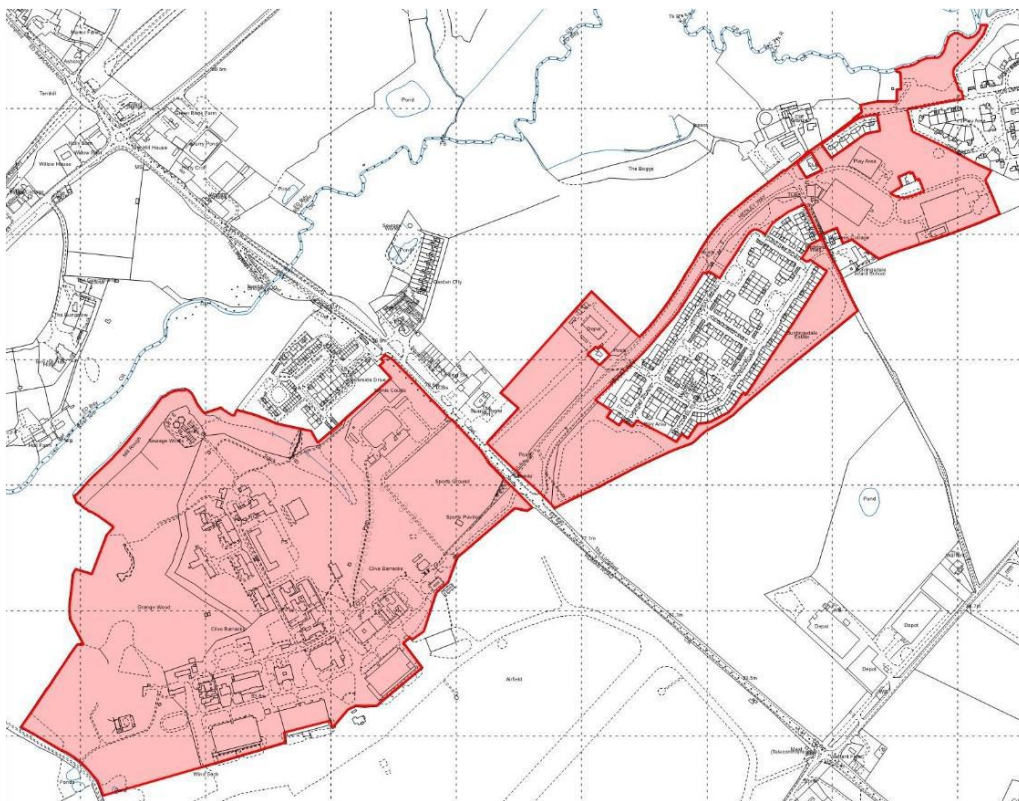


Figure 1: Land at Clive Barracks, Tern Hill

- 1.3 The proposed allocation is supported, and the DIO remain fully committed to the delivery of housing, employment and ancillary services and facilities at Clive Barracks and recognise the role of the site in the delivery of this during the Local Plan Review plan period and beyond. The DIO and Shropshire Council have prepared and submitted to this Examination a number of Statements of Common Ground (SoCG) to reflect the most up to date position in respect of the site and to aid the Examination of the Plan. The SoCG comprise the initial SoCG (May 2022) (SoCG04), an Addendum (June 2023) (SoCG04a) and the most recent SoCG (August 2024).

2. Matter 6 – Strategic Sites

Policy S19 – Clive Barracks, Tern Hill

1) Is the amended policy justified effective and consistent with national planning policy?

- 2.1 Yes, the *proposed* amended Policy is considered to meet the tests of soundness. For clarity however, our comments are provided against each test.

Justified

- 2.2 The proposed allocation of Clive Barracks is considered to form part of an appropriate strategy, inclusive of reasonable alternatives. Sites such as Clive Barracks are unique, in that they offer both a redevelopment opportunity of a brownfield site at a suitable quantum to serve strategic development needs. The NPPF is clear that *“strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land”*. Having regard to the intrinsic desirability of the utilisation of brownfield land there is a clear preference for sites such as Clive Barracks, which are or will become vacant to be used effectively to meet development needs.
- 2.3 There is a further requirement that Plans are based on proportionate evidence. Paragraph 31 of the NPPF states that 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”*. There is a clear understanding that the threshold for Local Plan allocation evidence sits below that required for a planning application. Evidence must only demonstrate that proposals are reasonably capable of be brought forward. It would be entirely unreasonable and ultimately unmanageable for the Examination to explore every allocation in forensic detail. We do however concede that proportionate evidence could reasonably be read to mean the more important the policy is, the greater the evidential burden is. Therefore, we accept that it is reasonable for the evidential burden for sites such as Clive to be greater than smaller allocations, on a proportionate basis. The DIO and the Council have fully recognised this position in bringing the site forward.
- 2.4 The key pieces of evidence available to the Examination include the Council’s submitted Sustainability Appraisal and Site Assessment Environmental Report of the Draft Shropshire Local (SD006.01)) and Delivery and Viability Study (2020) (EV115.01). The Council has also had access to a wide range of site-specific evidence which has been collated by the DIO. This evidence has been detailed in the various Statements of Common Ground for the site and covers a range of matters

including Highways, Noise, Flood Risk and Drainage, Ecology, Landscape, Heritage, Arboriculture and a Phase 1 Ground Investigation.

Effective

- 2.5 Of relevance to Policy S19, the requirement for Plans to be effective requires policies and allocations to be deliverable. For Policy S19 to be effective, the allocation of Clive Barracks and any relative site-specific requirements or other policies applicable to the site must simply be deliverable. Both the Council and the DIO are in agreement based on available evidence and a detailed understanding of the site and market conditions that the site is deliverable, as confirmed at 1.6 of the SoCG Addendum (August 2024).
- 2.6 It is noted that the NPPF Paragraph 68 requires only the identification of specific sites or broad locations in making allocations which will be brought forward in the latter years of the Plan period. It is clear that the NPPF envisages less evidence and less certainty for those sites anticipated to come later in the Plan period, as is inherent in the choice of terminology used by the NPPF for the two typologies (NPPF paragraph 68 a-b). The Council could, therefore, have identified Clive Barracks as a broad location for growth with far less evidence than has been prepared used to support this. Instead, the Council have chosen to go a step further demonstrating the delivery of the site through a full allocation and site-specific policy.
- 2.7 On the basis of the requirements of the NPPF, and the evidence available, our clear conclusion is the site is deliverable and the Effective test of soundness threshold has been met.

Consistent with national planning policy

- 2.8 The allocation of the site is consistent with the NPPF and its aims. Of relevance key paragraphs of the NPPF in considering the principle of the site's allocation are considered to include the following:
- 2.9 Paragraph 73 of the NPPF states "*the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements. provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)*".
- 2.10 Paragraph 119 states that strategic planning "*strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously*

developed or 'brownfield' land".

- 2.11 Paragraph 141 confirms that before proposing to release Green Belt land the Council must make "as much use as possible of suitable brownfield sites and underutilised land".
- 2.12 If the site was to not be allocated, the Council would still need to have due regard to paragraph 127 of the NPPF 2023 which states that "Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs."

Conclusion

- 2.13 The positive allocation of Clive Barracks is considered to meet the tests of soundness. It is supported by a commensurate evidence base. The utilisation of brownfield land is strongly endorsed by the NPPF. The site will becoming vacant within the Plan period (2030) and there is no better reuse of the site. The site provides supply within this Plan period and into the next Plan period, which will help mitigate the higher housing requirement potentially applicable to the next Shropshire Local Plan if the draft NPPF and standard method is brought into force.

2) Is the housing trajectory for the site realistic and deliverable?

- 2.14 An updated trajectory has been provided in relation to Matter 3 and is detailed within the August 2024 SoCG but is provided at the end of this matter statement for ease of reference. The updated trajectory reflects a revised disposal date of 3030. Whilst it is recognised that there has been delay to the vacation date, the DIO can confirm that the works associated with the relocation of the 1st Royal Irish Regiment, from Clive Barracks, are well advanced and closure works are likely to begin in 2028 with site disposal in 2030.
- 2.15 The revised disposal date reduces supply from the site by 25 dwellings within the Plan period.
- 2.16 The site trajectory is considered to be both realistic and deliverable. Preliminary work to support an outline application is already underway, with an application anticipated to be submitted in 27/28 and determined in 28/29. Site disposal is anticipated in 29/30, with determination of Reserved Matters applications anticipated in 2030/31 and delivery of a lower level of housing (25 units) the following year, 2031/32, and full output yield of 50 units per annum thereafter.

- 2.17 The delivery of 50 dwellings per annum for a scheme of this scale is a relatively modest and is considered a wholly deliverable. It is more than possible that the annual output could exceed 50 dwellings per annum, but conservative forecasts have been provided.
- 2.18 Lichfield's Start to Finish (March 2024) sets out that schemes of 500-999 dwellings (of which the site sits in the middle) take on average 5 years from validation of the first application to completion of the first dwelling, which broadly accords with the trajectory proposed for the site. The trajectory is therefore considered both realistic and robust, particularly given work is taking place now towards a planning application. In terms of annual yield, Start to Finish confirms that sites of 500-999 dwellings are anticipated to deliver between 44-83 dwellings per annum (Average build-out rate by size of site (dwellings) Lower quartile to upper quartile). The assumed 50 dwellings per annum yield for Clive Barracks is therefore at the lower end of this spectrum and robust, realistic and deliverable.

3) Have the infrastructure requirements of the proposed strategic settlement been adequately identified and costed?

- 2.19 Policy S19 and updates proposed under MM124, clearly identify the infrastructure requirements associated with the delivery of Clive Barracks. The requirements of the Policy have been informed by the extensive site-specific background evidence which has been prepared (referred to in previous SOCG - SoCG04 and SoCG04a).
- 2.20 Alongside the evidence base there has been ongoing engagement with key stakeholders through the Clive Barracks Task Force Group which comprises Parish Council's, Schools, Affordable Housing Providers, Council Officers, Local Councillors and the Local MP. These discussions have also been critical in informing the infrastructure requirements for the site and the associated timing of delivery which will be detailed through the future phasing plan as required by MM124.
- 2.21 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.

2.22 The August 2024 version of the Statement of Common Ground provides further detail on the each of the points raised by the Inspectors under this question. The Inspectors will already have had sight of this and as such the responses are not repeated again within this Statement.

4) Is there evidence that the infrastructure requirements will be delivered within the necessary timescales?

2.23 Yes, as demonstrated through the August 2024 SoCG there is a commensurate understanding of the site's infrastructure requirements. Whilst there is not yet a detailed phasing plan for the delivery of infrastructure and how this relates to the delivery of housing and employment provision, MM124 ensures the submission of a Phasing Plan once more detailed evidence is available to inform this.

2.24 The site is not heavily constrained in terms of infrastructure requirements, and those which have been identified the DIO, and the Council, are content can be phased appropriately.

2.25 As before, the August 2024 version of the Statement of Common Ground provides further detail on the each of the points raised by the Inspectors under this question. The Inspectors will already have had sight of this and as such the responses are not repeated again within this Statement.

Clive Barracks Trajectory

	Years 6 - 10					Years 11 -15					Years 16+		Total to 2038	Total beyond 2038
	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38		
Previously Advised		Outline Application	Disposal	Disposal/reserved matters application	25	25	50	50	50	50	50	50	350	400
Proposed due to Amended Disposal Date		Outline Application	Outline Application	Disposal	Disposal/reserved matters application	25	25	50	50	50	50	50	325	425