

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	David Fletcher DWF Planning Services
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Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- (Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	<input type="text"/>	Policy:	<input type="text" value="S21"/>	Site:	<input type="text" value="RAF Cosford"/>	Policies Map:	<input type="text"/>
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Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|-------------------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input checked="" type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
- (Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

<p>S21. Strategic Site RAF Cosford</p> <p>This submission supports the designation of Raf Cosford as a strategic site however the area of land to be removed from the Green Belt is considered to be inadequate to meet the stated aims of the Local Plan and the operational requirements of the site for this to be a growth zone on a strategic corridor.</p> <p>Policy S21.2 states the strategic site consists of around 221ha of land. The removal of this 221ha of land from the Green Belt is seen by the Council as being sufficient to accommodate any development proposals at the RAF Cosford site.</p> <p>Policy S21.2 refers to this land and states “over half of which is previously developed”. No exact figure of developable land is given and this is considered to be a serious omission when concluding that the allocated site is sufficient to meet the requirements of the Local Plan and Economic Growth Strategy for</p>

Shropshire.

This issue of what area of developable land realistically exists is further compounded by the existing site uses which are not identified on the site plan which simply shows large areas of apparent open areas suitable for development.

The largest apparent open area of land for development is the area shown on the plan between Cosford Grange Farm and Cheshire Lines. In fact of the undeveloped land a very significant proportion is covered by the grass areas to the north east of the airfield runway which are bounded to the north by the line of hangars and museum site to the west of the railway line. It is inconceivable that any significant development on this land could be accommodated whilst allowing the existing runway to remain operational.

The importance of the annual airshow to the County is referenced at para 7.11 and this area would if developed be unavailable for parking and other associated airshow activities such as parking for display aircraft. This would mean the loss of the annual airshow. Similarly the RAF Museums importance is also referred to in para 7.11 as a “nationally significant visitor attraction” with the “RAF Museum Cosford have announced ambitious plans for a £40 million investment programme over 10 years to intensify and expand the museum site”. This again would preclude any of this part of the site being used to accommodate new development and the reference to expansion could potentially require additional land from the allocated site to be given over to museum facilities.

The area of allocated land to the north of the railway line is taken up with the hangars and other training facilities associated with the Defence College of Technical Training (DCTT). There is some open land but this is used for various sports facilities. Similarly, the land to the south east of Worcester Road comprises the RAF Cosford Outdoor Stadium and associated sports pitches. The RAF Cosford site accommodates the RAF School of Physical Training and it is unlikely that these facilities could be removed to allow developed without an impact on this key operator. The guidelines referred to in S21.4 also protect from development open spaces.

The land to the east of the A41 and to the north of Sydnal Lane largely comprises residential accommodation and associated mess facilities. The site is fairly low density development and could be demolished for redevelopment but the Local Plan envisages in paragraph 7.7 that “over the next 10+ years RAF Cosford would see in the region of an additional 1,500 people (staff and student population), although this could potentially increase further dependant on the outcome of the ongoing work”. Para 7.9 expands this and states “To support these various activities, there will be a need to intensify the use of existing facilities and undertake new development to provide additional necessary facilities. This will likely include additional training facilities, technical accommodation and domestic accommodation”. It is therefore inconceivable that this area of accommodation can be reduced when the plans show that there will be an obvious substantial increase in demand for accommodation and associated facilities.

The constricting nature of the land allocation is further demonstrated by the need to remove 15 hectares of land at Neachley Lane to accommodate the formation of a new headquarters for the Midland Air Ambulance Charity referred to in S21.3. The existing site area obviously could not accommodate this fairly insignificant proposal without requiring the removal of this additional land from the Green Belt. This proposal does however further reduce the available developable land for future uses.

S21.4 requires “a high-level overarching masterplan will be prepared and then adopted by Shropshire Council”. These masterplans and resultant developments will be required to comply with a lengthy list of very restrictive site guidelines which will significantly impact on the ability of the site to accommodate anything more than token development. It is considered that when this masterplan is completed it will reveal that there is insufficient land removed from the Green Belt to accommodate future known needs let alone potential uses post 2038.

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Part A Reference:

Part B Reference:

The requirements for development to accommodate purely the growing demands of the DCTT growth of an additional 1500 staff/students in the next 10 years will account for a significant proportion of the small areas of development land within the strategic site allocation. When the non DCTT moves referenced in para 7.8 and 7.9 and their “ additional training facilities, technical accommodation and domestic accommodation” are also factored in then it is considered that the site area removed from the Green Belt is insufficient to meet the requirements of the Economic Growth Strategy for Shropshire referenced in para 7.18 and 7.19.

The Local Plan is accompanied by a review of the Green Belt which should take account of potential demand post 2038 and this has not been allowed for in the current allocation as no land has been allocated as safeguarded land to accommodate the future growth of this strategic site. The area of land removed from the Green Belt has been artificially restricted to that in MOD ownership and this will reduce the ability of this strategic site to accommodate supporting uses as desired by the Local Plan.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The area of land removed from the Green Belt as part of Policy S21 fails to meet the Councils own requirements and those of the NPPF that require the Green Belt review to consider both Shropshire Councils development requirements as well as the need to allocate as safeguarded land sufficient developable land to accommodate the future growth of this strategic site beyond 2038.

To meet this shortfall the Council should amend the area of land to be removed from the Green Belt to take in a larger area to allow the anticipated growth. This could be achieved by re examination of the site to the west of the A41 bounded to the north by Sydnal Lane and to the west Shackerley Lane. This would provide an additional 16 hectares of land for future development without significant impact on the aims of the Green Belt by retaining an element of open Green Belt between Cosford and Albrighton so as to maintain a strategic gap.

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)

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	Part B Reference:

(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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(Please continue on a separate sheet if necessary)

Please note: The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

D W Fletcher

Date:

26/01/2021

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	Part B Reference: