

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:		McCabe, Defe inistry of Defe		astructure Or	ganisation (c	on behalf of
Q	1. To which document	does	this represe	entatio	n relate?		
•	Regulation 19: Pre-Su	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan					
Ľ	Sustainability Appraisa	al of the	Regulation 1	9: Pre-Sı	ubmission Dra	aft of the Shr	opshire
C	Habitats Regulations A Shropshire Local Plan (Please tick one box)						
Q	Q2. To which part of the document does this representation relate?						
Pa	aragraph:	Policy:	DP11 – Minimising Carbon Emissions	Site:	Click or tap here to enter text.	Policies Map:	

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

A. Legally compliant	Yes: 🗹	No:
B. Sound	Yes: 🗹	No:
C. Compliant with the Duty to Co-operate (Please tick as appropriate).	Yes: 🗹	No:

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.

(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.

PLEASE SEE SUPPORTING STATEMENT

(Please continue on a separate sheet if necessary)

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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)



no, i do not wish to participate in nearing session

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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

Office Lice Only	Part A Reference:	
Office Use Only	Part B Reference:	

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Signature:

Jodie McCabe

Office Llee Only	Part A Reference:
Office Use Only	Part B Reference:



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Part B: Representation

Name and Organisation:	Jodie McCabe, Defe the Ministry of Defe		e Organisation (on behalf of		
Q1. To which document	does this represe	entation relate?	•		
Regulation 19: Pre-Su	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan				
Sustainability Appraisa 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	e document does	this representa	tion relate?		
Paragraph: Policy: DP12 - The Natural Site: Click or tap here to Environment Site: Click or Map:					
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:					
A. Legally compliant		Yes: 🗹	No:		
B. Sound Yes: 🗹 No: 🗌					
C. Compliant with the Dut	y to Co-operate	Yes: 🗹	No:		
(Please tick as appropriate	e).				
Q4. Please give details	of why you consid	ler the Regulati	on 19: Pre-Submission		

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.

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



Yes, I wish to participate in hearing session(s)

(Please tick one box)

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Office Llee Only	Part A Reference:	
Office Use Only	Part B Reference:	

Signature:	Jodie McCabe	Date:	25/02/2021
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Office Use Only	Part A Reference:
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Part B: Representation

Name and Organisation:	Jodie McCabe, Defence Infrastructure Organisation (on behalf of the Ministry of Defence)
------------------------	--

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:		Policy:	DP18 – Pollution and Public Amenity	Site:	Click or tap here to enter text.	Policies Map:	
	u consider e Local Pla	_	lation 19:	Pre-Sub	mission Dr	aft of the	
A. Legally	compliant			Yes:	\checkmark	No:	
B. Sound				Yes:		No: 🔽	

C. Compliant with the Duty to Co-operate

(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.

 $\mathbf{\nabla}$

No:

Yes:

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.

(Please continue on a separate sheet if necessary)

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



Yes, I wish to participate in hearing session(s)

(Please tick one box)

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	Name and Organisation:	me and Organisation: Jodie McCabe, Defence Infrastructure Organisation (on behalf of the Ministry of Defence)						
Q	Q1. To which document does this representation relate?							
	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan							
Ľ	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan							
C	Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (Please tick one box)							
Q	2. To which part of the	document does this repres	sentation relate?					
Paragraph: Policy: DP20 - Water Efficiency Site: Click or tap here to enter text. Policies Map:								
_	3. Do you consider the hropshire Local Plan is	Regulation 19: Pre-Submis	ssion Draft of the					
	A. Legally compliant Yes: 🗹 No: 🗌							
B. Sound Yes: 🗹 No: 🗌								
	C. Compliant with the Duty to Co-operate Yes: 🗹 No: 🗌 (Please tick as appropriate).							
0	A Dianan give detaile	f why you concider the De	aulation 10. Dra Cubmission					

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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.

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



Yes, I wish to participate in hearing session(s)

(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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Office Use Only	Part A Reference:
Office Use Offiy	Part B Reference:

Signature:	Jodie McCabe	Date:	25/02/2021
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Office Use Only	Part A Reference:
Office Use Offiy	Part B Reference:



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Q1. To which document does this representation relate?

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 - 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:	Policy:	DP26 – Strategic, Renewable & Low Carbon Infrastructure	Sit	e:	Click or tap here to enter text.		Policies Map:	
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:								
A. Legally complia	nt		Yes:	\checkmark]	No:		
B. Sound			Yes:]	No:	\checkmark	
C. Compliant with (Please tick as app	,	o-operate	Yes:	\checkmark	1	No:		

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.

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



Yes, I wish to participate in hearing session(s)

(Please tick one box)

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Office Use Only	Part A Reference:
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Q	Q1. To which document does this representation relate?							
5	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan							
Ľ		Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan						
C	- Shrop	Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (Please tick one box)						
Q	2. To whi	ich part of the	docu	ument does t	his repr	esentatior	ו relate	
Pa	aragraph:	P	olicy:	DP31 – Managing Development & Operation of Minerals Sites	Site:	Click or tap here to enter text.	Polici Ma	
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:								
	A. Legally	compliant			Yes:	Z	No:	
B. Sound					Yes:		No: 🗹	

C. Compliant with the Duty to Co-operate

(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.

No:

Yes:

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.

(Please continue on a separate sheet if necessary)

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



Yes, I wish to participate in hearing session(s)

(Please tick one box)

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Office Use Only	Part A Reference:
	Part B Reference:



No:

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Ľ	Sustainability Appraisa Local Plan	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan						
C	Habitats Regulations A Shropshire Local Plan (Please tick one box)	·						
Q	2. To which part of the	document	does this rep	oresentatio	n relate?			
Paragraph: S17 - Click or Policies					Policies Map:			
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:								
	A. Legally compliant		Yes:	\checkmark	No:			
	B. Sound		Yes:		No: 🗹			

C. Compliant with the Duty to Co-operate

(Please tick as appropriate).

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Yes: 🗸

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Signature:	Jodie McCabe	Date:	25/02/2021
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(Please tick one box)

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

Paragraph:	Policy:	S19 – Strategic Settlement: Clive Barracks	Site:	Click or tap here to enter text.	Policies Map:		
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:							
A. Legally com	pliant		Yes:	\checkmark	No:		
B. Sound			Yes:	\checkmark	No:		
C. Compliant with the Duty to Co-operate (<i>Please tick as appropriate</i>).				\checkmark	No:		

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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:		Policy:	S21 – Strategic Site: RAF Cosford	Site:	Click or tap here to enter text.	Policies Map:	
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:							
A. Legally compliant				Yes:	\checkmark	No:	
B. Sound				Yes:		No: 🗹	
C. Compli	ant with the	Duty to Co-	operate	Yes:	\checkmark	No:	

(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.

(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.

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PLEASE SEE SUPPORTING STATEMENT

(Please continue on a separate sheet if necessary)

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



No, 1 do not wish to participate in hearing session(

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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

Office Use Only	Part A Reference:
Office Use Only	Part B Reference:

Whilst the points raised in MOD's representations can be addressed appropriately by written representations, given that this is a strategic site allocation, if the Inspector has questions that require MOD attendance at the hearing then MOD would be happy to attend.

(Please continue on a separate sheet if necessary)

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Signature:

Jodie McCabe

Office Use Only	Part A Reference:
	Part B Reference:



Representation Form

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Part B: Representation

	Name and Organisation:	Jodie McCabe, Defence Infrastructure Organisation (on behalf of the Ministry of Defence)						
Q	Q1. To which document does this representation relate?							
	Regulation 19: Pre-Su	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan						
Ľ	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan							
C	Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan (Please tick one box)							
Q	2. To which part of the	e document do	es this re	presentatio	n relate?			
Pa	Paragraph: Policy: SP2 - Strategic Approach Site: Click or tap here to enter text. Policies Map:							
_	Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:							
	A. Legally compliant Yes: 🗹 No:							
	B. Sound Yes: 🗹 No:							
	C. Compliant with the Duty to Co-operate Yes: 🗹 No: 🗌 (Please tick as appropriate).							
0	A Plazca give details		ncidar tha	Population	10. Dro-S	ubmission		

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.

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PLEASE SEE SUPPORTING STATEMENT

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



Yes, I wish to participate in hearing session(s)

(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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Office Llee Only	Part A Reference:
Office Use Only	Part B Reference:

Signature:	Jodie McCabe	Date:	25/02/2021
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Office Use Only	Part A Reference:
Office Use Offiy	Part B Reference:



Representation Form

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Part B: Representation

Name and Organisation:	Jodie McCabe, Defence Infrastructure Organisation (on behalf of the Ministry of Defence)

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:	Policy:	SP10 – Managing Development in the Countryside	Site	*	k or here to r text.	Policies Map:	
Q3. Do you conside Shropshire Local P	-	ulation 19: Pi	re-Sul	omissio	on Draft	of the	
A. Legally compliant			Yes:	\checkmark	No): 🔲	
B. Sound			Yes:	\checkmark	Nc): 🗌	
C. Compliant with th (Please tick as appro		o-operate	Yes:	\checkmark	No): 🗌	

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.

(Please continue on a separate sheet if necessary)

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



no, i do not wish to participate in nearing session

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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

Office Lice Only	Part A Reference:
Office Use Only	Part B Reference:

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Signature:

Jodie McCabe

Office Llee Only	Part A Reference:
Office Use Only	Part B Reference:



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Part B: Representation

	Cabe, Defence Infrastructure Organisation (on behalf of ry of Defence)
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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:	Policy:	SP11 – Green Belt & Safeguarded Land	Site	Click or tap here to enter text.	Policies Map:	
Q3. Do you conside Shropshire Local Pl	_	lation 19: P	re-Sub	mission Dra	aft of the	
A. Legally compliant			Yes:	\checkmark	No:	
B. Sound			Yes:	\checkmark	No:	
C. Compliant with the <i>(Please tick as appro</i>	,	-operate	Yes:	\checkmark	No:	

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.

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(Please continue on a separate sheet if necessary)

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



no, i do not wish to participate in nearing session

Yes, I wish to participate in hearing session(s)

(Please tick one box)

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Office Lice Only	Part A Reference:
Office Use Only	Part B Reference:

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Signature:

Jodie McCabe

Office Llee Only	Part A Reference:
Office Use Only	Part B Reference:

Shropshire Council: Shropshire Local Plan



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-						
	Name and Organisation:	Organisation: Jodie McCabe, Defence Infrastructure Organisation (on behalf of the Ministry of Defence)				
Q	Q1. To which document does this representation relate?					
[Regulation 19: Pre-Sul	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan				
Ľ	Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan					
Ľ	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?						
Pa	Paragraph:Policy:Appendix 7Site:Click or tap here to enter text.Policies Map:					
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:						
	A. Legally compliant		Yes:	\checkmark	No:	
	B. Sound			\checkmark	No:	
	C. Compliant with the Duty to Co-operate (Please tick as appropriate).			\checkmark	No:	
0	04 Please give details of why you consider the Pegulation 19: Pre-Submission					

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.

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



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(Please tick one box)

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Office Use Only	Part A Reference:		
Office Use Offiy	Part B Reference:		

Signature:	Jodie McCabe	Date:	25/02/2021
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Office Use Only	Part A Reference:
Office Use Offiy	Part B Reference:

Shropshire Council: Shropshire Local Plan



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N	ame and Organisation:	Jodie McCabe, Defence Infrastructure Organisation (on behalf of the Ministry of Defence)			
Q1.	To which document	does this representation relate?			
	Regulation 19: Pre-Submission Draft of the Shropshire Local Plan				
\checkmark	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: Policy: Site: RAF Cosford Policies Map:					
Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:					
Α.	Legally compliant	Yes: 🗹 No: 🗌			
В.	Sound	Yes: No: 🗹			
	Compliant with the Duty lease 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					

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Signature:	ture: Jodie McCabe			25/02/2021
		Office Use Only	Part A Reference:	
	Office	Office Use Offiy	Part B Reference	ce:



Shropshire Local Plan 2016-2038: Regulation 19 Pre-Submission Draft: Ministry of Defence Representations – Supporting Statement

Introduction

- 1.1 The Defence Infrastructure Organisation (DIO), on behalf of the Ministry of Defence (MOD), welcomes the opportunity to feed into the above consultation.
- 1.2 Shropshire contains a number of operational MOD sites which are vital to support national defence activities. The need to protect national defence interests is recognised within paragraph 95 of the National Planning Policy Framework (NPPF) and it is therefore important that the policies contained within the Shropshire Local Plan recognise the need for defence sites and activities within the county to be appropriately protected, and for defence related development to be supported.
- 1.3 The MOD welcomes the engagement that it has had with Shropshire Council to date and recognises that changes have been made to the emerging Local Plan in response to earlier comments from the MOD. As a result of this, the MOD is supporting a number of policies within the plan. However, there are some elements of the plan that would benefit from additional amendments and clarifications in order to ensure that they are appropriately sound.

Policy SP2 - Strategic Approach

1.4 The MOD continues to support the recognition within section 5d of the RAF Cosford Strategic Site forming a centre of excellence for aviation and engineering, meeting military personnel accommodation needs and supporting the aspirations of the MOD. Further comments with respect to RAF Cosford are set out in the representations to Policy S21.

Policy SP10 - Managing Development in the Countryside

1.5 Previously the MOD had concerns that this policy did not appropriately recognise that there are defence sites within the countryside. Flexibility needed to be afforded to such sites to recognise that despite their countryside location development needs to take place, in the national interest, to continue to meet defence requirements. Therefore, the MOD welcomes the addition of "operational defence" to the Regulation 19 version of this policy. This change will ensure that appropriate flexibility is given to proposals on defence sites and it is supported.

Policy SP11 - Green Belt and Safeguarded Land

- 1.6 The MOD supports the reference within part 2 of this policy to the Strategic Site at RAF Cosford being excluded from the Green Belt and the reference in part 7 to RAF Cosford being a strategic site inset within the Green Belt to "facilitate military and charity operational and development needs." However, the MOD would like to request a minor factual change to part 7 so that it reads "facilitate <u>defence military</u> and charity operational and development needs."
- 1.7 The MOD also welcomes the change that has been made to Paragraph 3.107 following on from the MOD representation to the Regulation 18 Pre-Submission Draft in 2020. The change now provides clarification that the RAF Cosford Strategic Site is removed from the Green Belt and the MOD supports this change.

Policy DP11 - Minimising Carbon Emissions

1.8 The MOD supports the change to part 2 of this policy which now notes that there are equivalent standards to BREEAM. The change will enable Shropshire Council to consider proposals that are assessed with the Defence Related Environmental Assessment Method (DREAM) which is an environmental assessment tool developed by the DIO for new build and refurbishment projects on the defence estate.

Policy DP12 - The Natural Environment

1.9 The MOD supports the new wording that has been included in paragraph 4.130. This recognises the need for habitat enhancement and creation measures within designated safeguarding zones to avoid creating an environment that would attract large or flocking bird species. The inclusion of this wording helps to protect defence interests, particularly with regards to aviation safety, and it is supported.

Policy DP18 - Pollution and Public Amenity

<u>Part 11</u>

- 1.10 Noise sensitive development proposed close to areas where defence activities create noise can lead to noise complaints being submitted to MOD. These can in turn result in MOD having to alter the way in which operational activity is undertaken or, at worst, lead to MOD having to withdraw from a site. This clearly has the potential to adversely impact on national defence interests.
- 1.11 Shropshire includes an important operational training area at Nesscliff and also a number of other sites where flying activities take place, including RAF Cosford, RAF Shawbury and Ternhill Airfield. In addition, the whole of Shropshire (and the borders of adjacent counties) is also covered by Low Flying Area 9 (LFA9), which is a dedicated helicopter training area for military helicopters. More information about

LFA9 is available at <u>https://www.raf.mod.uk/our-organisation/stations/raf-shawbury/flying-info/</u>. It should be noted that within LFA9, intensive low-level helicopter activity, often down to ground level, takes place within the area between Monday to Friday 8.45am-6.30pm. At periodic intervals, this flying activity also includes night flying.

- 1.12 Therefore, defence activities in Shropshire have the potential to impact on development where the use is noise-sensitive. In recent years, residential, equestrian and poultry farming related development has been of particular concern to MOD in Shropshire. The issue of noise from defence activities was a key consideration in the recent appeal in relation to a proposed crematorium at Nesscliffe (Appeal Ref: APP/L3245/W/19/3236638), where the Inspector concluded that the development would result in an unacceptable environment for mourners and visitors to the crematorium in respect of noise and disturbance.
- 1.13 The MOD is increasingly seeing proposals for development which could lead to an increase in noise complaints and, in many cases, applicants fail to adequately engage with MOD on the production of noise assessments and fail to adequately assess noise arising from defence activities within such assessments. Paragraph 95 of the NPPF requires that planning policies and decisions ensure that *"operational sites are not affected adversely by the impact of other development proposed in the area".* Clearly if flying activities in Shropshire are forced to change due to noise complaints from new development, this can impact adversely on the ability of MOD sites such as RAF Shawbury to undertake their operations effectively.
- 1.14 MOD recognises and welcomes the fact that Shropshire Council has made changes to this policy in light of MOD representations to the previous Regulation 18 consultation in 2020. Of particular note is the inclusion of an additional section (Part 11) within the policy. Whilst MOD welcomes the inclusion of a section which takes into account defence interests, the wording does not go far enough to fully protect national defence interests. The policy only refers to development proposals "*within a designated Ministry of Defence Safeguarding Zone*" not having an adverse effect on an operational defence site. Whilst it is recognised that statutory safeguarding areas are designated to ensure that the operation of aerodromes, explosives storage sites and technical assets is unaffected, there are other operational activities that do not fall into these categories. An example of a non-safeguarded essential operational activity is the use of a low flying area (in this case LFA9) as well as the Nesscliff Training Area for low level military aviation training. There may be occasions where development has the potential to impact on these activities.
- 1.15 In order to fully protect defence interests, in accordance with Paragraph 95 of the NPPF, MOD would like to see the text in part 11 of the policy amended along the lines of:

"Planning decisions should take wider security and defence requirements into account. Development proposals, <u>in particular those</u> within a designated Ministry of Defence Safeguarding Zone, must ensure that they have no adverse effect on an operational defence site<u>s or activities</u>,"

Paragraph 4.172

- 1.16 The MOD welcomes and supports the additional wording included within this paragraph which requires noise assessment for development that would be sensitive to existing noise sources and a requirement for the MOD to be consulted where the existing noise source is related to defence activities.
- 1.17 In order to ensure that the risk of future noise complaints is reduced as far as possible and similar to the specific requirement that the Council has already included within housing allocation SHA019 within the Wem Place Plan, the MOD would like to see a requirement for developers to make future occupiers aware of the presence of military flying activities in the area. The MOD would like to see the additional wording along the following lines added on to the end of this paragraph:

"Development for residential uses should ensure that future occupiers are aware that military aircraft may be seen and heard operating in the area and that aircraft may fly overhead."

Paragraph 4.176

1.18 In principle, the inclusion of this new paragraph which relates to taking into account defence requirements is supported and welcomed by MOD. However it does require some clarification as, as currently written, and similar to the points raised relating to part 11 of the policy, it is not completely accurate and does not fully protect national defence interests due to the reliance on safeguarding zones and lack of reference to LFA9. MOD would like to see the following amendments to the paragraph to pick up on these issues and ensure that the wording was appropriately justified and effective.

"Planning decisions should take public safety, security and defence requirements into account. Wider public safety issues are covered in Policy SP6, but Shropshire has contains a number of military establishments and the whole of the county is covered by Low Flying Area 9, a dedicated helicopter training area for military helicopters. There are defence sites in Shropshire for which statutory where t<u>The Ministry of Defence (MOD)</u> have designated a safeguarding zones have been designated in accordance with the Town and Country Planning (Safeguarded aerodomes, technical sites and military explosives storage areas) Direction 2002. Development close to MOD sites and development within safeguarding these potential to affect defence activities and the MOD should be consulted on all applications affecting these areas. Permission will not be granted where adverse effects on operational defence sites cannot be avoided."

Policy DP20 - Water Efficiency

1.19 The MOD supports the change to part 2 of this policy which now notes that there are equivalent standards to BREEAM. The change will enable Shropshire Council to consider proposals that are assessed with the Defence Related Environmental

Assessment Method (DREAM) which is an environmental assessment tool developed by the DIO for new build and refurbishment projects on the defence estate.

Policy DP26 - Strategic, Renewable and Low Carbon Infrastructure

- 1.20 The MOD welcomes the inclusion within the policy of the reference to aircraft safety and defence operations. With respect to wind turbines, these have the capacity to have a considerable impact on both aviation safety and the operation of radar and technical assets, so the MOD welcomes the requirement to take defence interests into account.
- 1.21 However, in order to improve the effectiveness of the policy and to ensure that it is justified and is the most appropriate strategy, the MOD would like to see additional wording within either the policy itself, or the supporting text. In accordance with the National Planning Practice Guidance on Renewable and Low Carbon Energy (Paragraph: 016 Reference ID: 5-016-20140306), MOD would like to see wording included along the following lines: "Where a proposed turbine is 11 metres to blade tip or taller, and/or has a rotor diameter of 2 metres or more, it will be necessary to ensure that it would offer no detriment to the operation of defence technical assets such as radar". This would address the actual impact of wind turbines.

Policy DP31 - Managing Development and Operation of Mineral Sites

1.22 The MOD welcomes the fact that Shropshire Council has included additional wording within new paragraph 4.275 which contains specific references to taking care to avoid the creation of attractant environments for large and flocking bird species. However, this paragraph only relates to restoration proposals. To fully protect defence interests, the need to mitigate bird hazard should extend throughout the life of the development, including the extraction phase. Reflecting the comments provided at Regulation 18 stage, to ensure that the policy is in accordance with Paragraph 95 of the NPPF and is fully effective and justified, MOD would like to see paragraph 4.275 reworded to read:

"Where a proposed development would result in mineral working or extraction falling within a designated safeguarding zone (Birdstrike zone / Plan B) it will be necessary for the applicant to provide and agree bird hazard management plans for the extraction, restoration and post restoration phases. It would also be necessary to agree details of the restoration of extraction sites to ensure that the development does not result in the creation of an attractant environment for large and flocking bird species that would reduce aviation safety."

Policy S17 - Wem Place Plan Area

Schedule S17.2(i). Site Allocations: Community Hubs in the Wem Place Plan Area

1.23 The MOD welcomes the amendment that has been made to allocation SHA019 (Land between the A53 and Poynton Road, Shawbury). This policy now makes reference to the need for noise from defence activities to be appropriately managed and requires engagement with the MOD as part of production of an appropriate noise assessment. This change is supported by the MOD.

Explanatory Text: Paragraph 5.250

1.24 The inclusion of a reference to RAF Shawbury and the additional text within paragraph 5.250 is welcomed and supported in principle. However, the MOD would like to see some clarification to this paragraph to ensure that it is factually accurate.

"RAF Shawbury <u>adjoins Shawbury village's north-western development</u> <u>boundary. It</u> is an <u>important defence establishment</u>, <u>training students from</u> <u>across the UK Armed Services and international partners</u> key Royal Airforce <u>Training Facility</u>, adjoining Shawbury village's north-western development <u>boundary</u>. Development in Shawbury village and within designated MOD safeguarding zones for this facility should ensure future occupiers are aware that military aircraft may be seen and heard operating in the area and aircraft may overfly the site".

1.25 The MOD also has concerns that this paragraph only relates to development within the village and within the designated safeguarding zones. In practice, sensitive development can still be impacted by noise from defence activities outside of these areas. However, this issue is raised and considered in more detail under Policy DP18 – Pollution and Public Amenity, therefore MOD have no further comments specifically relating to paragraph 5.250.

Policy S19 Strategic Settlement: Clive Barracks

1.26 Detailed comments on this policy are provided in separate representations submitted by Fisher German, on behalf of DIO. However, from a safeguarding and ongoing operational requirements perspective, MOD supports the addition of part 3i of the policy. This provides clear direction that the design of new development would be required to have no detrimental impact on the operation of the airfield and associated technical assets.

Policy S21 Strategic Site: RAF Cosford

1.27 RAF Cosford is, and will continue to be, an important defence establishment. Therefore, the MOD continues to support the inclusion of the majority of RAF Cosford within this Strategic Site allocation, and the associated removal of the site from the Green Belt. The removal of the Green Belt designation from a significant proportion of RAF Cosford, coupled with the in-principle support for defence related development that Policy S21 affords, will reduce planning risk and support national defence.

1.28 Whilst Policy S21 is supported in principle and the MOD welcomes the engagement it has had with Shropshire Council to date on the detailed wording of the policy, there are some outstanding points where the MOD would like to see additional change.

<u>Part 4</u>

- 1.29 This section of the policy requires that development of the different parts of the site will be "coordinated and complementary". It is not clear however how the Council anticipates a co-ordinated approach to the development of the site, particularly given that planning permission has recently been granted for the MAAC development.
- 1.30 The requirement for a masterplan for the RAF Cosford element of the site needs to take into account the fact that RAF Cosford is an existing, operational, defence establishment. Therefore, whilst work continues within MOD to consider how development at the site could potentially expand and intensify in the future, work on maintaining and supporting the existing establishment and its associated activities continues. It is important that any reliance within the policy on the requirement for a masterplan does not, in the interim, prevent development to support the ongoing activities at the site from taking place. Furthermore, the MOD is not clear what "proactive engagement" the Council expects to be carried out as part of the masterplanning process.
- 1.31 The MOD would like to see amendments to the initial paragraph of Part 4 of the policy, to ensure that the policy is appropriately clear, justified and effective:

"Development of the various elements of this site will be coordinated and complementary. This will be informed by the preparation of detailed masterplans for each element of the site, informed by proactive engagement, including with relevant landowners/occupiers of the wider Strategic Site; and will subsequently be adopted by Shropshire Council. These masterplans and any resultant development proposals for the site will comply with the following site guidelines:"

Criterion b

1.32 The MOD continues to welcome and support the reference within this policy to a requirement for development on the MAAC site to not adversely impact on Ministry of Defence operations at RAF Cosford.

Criterion g

1.33 TheMOD welcomes the addition of a reference to the consideration of opportunities for improvements to pedestrian and cycle links into Albrighton.

<u>Criterion h</u>

1.34 The MOD acknowledges that changes have been made to this criterion in light of the MOD comments to the previous local plan consultation. The criterion would no longer automatically require the MOD to re-provide sports and recreation facilities if there is no longer an operational requirement for them but will give the MOD the opportunity to demonstrate where facilities are surplus to requirements. This change is supported by the MOD.

Criterion m

- 1.35 The MOD raised concerns at the previous consultation stage that the policy appeared to be applying the same criterion as the two strategic settlements, without acknowledging the key difference with RAF Cosford, the fact it is an existing development which will remain in use by three separate key users (MOD, RAF Museum and the Midlands Air Ambulance Charity), not a site for wholescale redevelopment like Clive Barracks and the former Ironbridge Power Station site. Previous reference to "the site" incorporating sustainable drainage could have been read as requiring the retrospective application of sustainable drainage features to the existing development on the site. This was considered to be unreasonable and onerous.
- 1.36 The Regulation 19 version of the plan has some amendments to this criterion which do go some way to try to address the concerns previously raised by the MOD. However, the inclusion of the wording "any new development" implies that sustainable drainage will be required for all future applications, when, dependant on the nature of the application, this may not be appropriate. In order to ensure that the policy is fully justified, MOD would like to see the criterion amended to remove the first word "Any".

Criterion n

- 1.37 It is recognised that Paragraph 138 of the NPPF sets out a requirement for compensatory improvements to the environmental quality and accessibility of remaining Green Belt land to offset the impact of removing land from the Green Belt. It is understood that the purpose of this criterion is to address this requirement.
- 1.38 There have been some changes to the criterion in light of previous MOD representations, however this criterion still has the potential to be onerous and confusing and would benefit from some further clarification to ensure that it is fully justified.
- 1.39 The criterion applies to "any new development proposals". Unlike the two Strategic Settlement Policies within the plan, RAF Cosford is an existing, developed and operational site rather than a site which will be subject to wholescale redevelopment. Therefore, whilst major development could come forward on the site in the future as set out within the policy, there will also be more minor development associated with maintaining or extending the existing buildings on the site, or for meeting new

requirements. The criterion as currently written appears to require even minor applications for small-scale development to provide improvements to Green Belt boundaries, which appears to be onerous.

- 1.40 Furthermore, as currently written, the criterion could require the MOD to make improvements to Green Belt that is not within the ownership of the MOD which may not be appropriate or achievable. The criterion also could be read as requiring a number of improvements for each development so additional flexibility is required to ensure that the most appropriate improvement can be considered on a case by case basis. In addition, any new landscaping or additional planting would need to ensure that it did not adversely affect operational activities at RAF Cosford.
- 1.41 The MOD requests that this criterion is amended along the lines of:

"Opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt will be included as part of any-new development proposals, as set out in accordance with Green Belt Policy SP11. Compensatory provision to the remaining Green Belt at <u>RAF Cosford will could</u> include appropriate additional planting to improve visual amenity and biodiversity and/or creation of linkages to green infrastructure networks and corridors beyond the site. Any such provision should not impede operational activities at RAF Cosford".

Paragraph 7.11

1.42 The MOD would like to see a minor, factual clarification to this paragraph, as follows:

"The RAF Museum Cosford is dedicated to the history of aviation and in particular the RAF. As such the museum provides an important record of our aviation and RAF history, whilst also representing a nationally significant visitor attraction. The RAF <u>Museum</u> Cosford <u>also</u> hosts the ever popular Cosford Air Show, <u>supported by the RAF Museum</u>. The RAF Museum Cosford have announced ambitious plans for a £40 million investment programme over 10 years to intensify and expand the museum site".

Paragraph 7.14

1.43 There is a minor editing issue within the first sentence of paragraph 7.14 in relation to the MAAC proposals:

" The MAAC require a new headquarters in order to combine two of their The MAAC requires a new headquarters to future proof..."

Appendix 7: Forecast of Delivery Timescales for Local Plan Allocations

1.44 The MOD supports the recognition within this appendix that the delivery of development at the strategic site at RAF Cosford falls across the whole plan period, and beyond. RAF Cosford is an existing, operational defence site and as such is likely to see development brought forward within the short, medium and longer term, whether this is required to expand / intensify the defence use of the site or help to maintain / support existing site uses and activities.

Sustainability Appraisal – Appendix T

- 1.45 The MOD made a number of comments with respect to the Sustainability Appraisal that was consulted on between August and September 2020 as part of the Regulation 18 Pre-Submission Draft Local Plan Consultation. The comments highlighted the MOD's concern that some of the assessments / conclusions in relation to the RAF Cosford Strategic Site are not accurate. No amendments appear to have been made in the Sustainability Appraisal that supports the Regulation 19 consultation and therefore the MOD would like to reiterate its points raised at Regulation 18 stage in 2020 as it is considered that some of the information within the Sustainability Appraisal is not factually accurate.
- 1.46 Appendix T of the Sustainability Appraisal (SA) has been reviewed with a particular focus on Site "*Part 28 and parts of CFD001, P30 and P40*" which is understood to relate to the RAF Cosford Strategic Site, although it would have been helpful for the document to clarify this. From the employment perspective, the site scores -10 which is deemed to be a "Fair" rating. However, the MOD is concerned that some of the conclusions in relation to the RAF Cosford site are not accurate in relation to the following points:
 - The site scores a '-' in respect of the criterion "within 100m of a Local Nature Reserve". Whilst it is understood that the Donington and Albrighton Local Nature Reserve (DALNR) is located within Albrighton, this is not within 100m of the Strategic Site. It is estimated that at its closest point the Strategic Site is just over 500m from the DALNR. Therefore, the site score for this criterion should be amended to '0'.
 - The site scores a '-' in respect of the criterion "Tree Preservation Order (single or group) within or on site boundary". The MOD has attempted to contact the Tree's Team at Shropshire Council to get clarification of where the TPO(s) affecting the site is/are as the MOD is not aware of any TPOs at RAF Cosford but to date no response has been received. Therefore, unless evidence is presented which clearly shows TPOs on the Strategic Site, the score for this criterion should be amended.
 - The site scores a '-' due to a lack of a GP surgery within 480m. However, this is not a fair assessment. There *is* a medical centre at RAF Cosford which is primarily for regular uniformed personnel and their families / dependents.

Therefore, the score in respect of this criterion should be adjusted to a '+' or, at a minimum, '0'.

- The site scores a '--' due to the presence of a listed building on the site. The building in question is the Fulton Block which is Grade II listed. However, the double negative score does not appear to be a fair assessment. The Station is fully aware of the listed building status of the Fulton Block and the building is being maintained and is in use. There is a significant amount of existing development in close proximity to the building. Therefore, it is not clear how the Strategic Site allocation would have such a negative impact on the listed building and the score should be adjusted accordingly to a '-' at most.
- The site scores a '-' in respect of the criterion "within 300m of a Conservation Area". Whilst it is understood that there are three conservation areas within Albrighton, and one at Tong, none of these are within 300m of the Strategic Site allocation. The closest point, which relates to the Donington and Albrighton Conservation Area appears to be in the region of 600m from the Strategic Site. Therefore, the site score for this criterion should be amended to '0'.
- 1.47 Taking into account the above points, the score for the RAF Cosford site should be amended accordingly to ensure that the Sustainability Appraisal is factually accurate.