

**Shropshire Council Local Plan
2016 – 2038**

Statement of Common Ground between

**The Ministry of Defence and
Shropshire Council**

**with Respect to Policy S21 – Strategic Site:
RAF Cosford**

12 May 2022

1. Introduction

- 1.1 This Statement of Common Ground (SoCG) has been prepared jointly between the Ministry of Defence (MOD) and Shropshire Council (SC). The purpose of this document is to summarise for the Inspectors additional background information with respect to RAF Cosford and to highlight those matters of agreement and the limited matters of disagreement that exist between the MOD and SC with respect to the proposed RAF Cosford Strategic Site and Policy S21 – Strategic Site: RAF Cosford. The key focus of this statement is on the points raised within the representation made by MOD to the Regulation 19 Pre-Submission Draft Shropshire Local Plan consultation in relation to RAF Cosford.

2. Background

- 2.1 Shropshire Council is in the process of undertaking a Local Plan Review to ensure that policies and proposals remain up to date. The Draft Shropshire Local Plan covers the period 2016-2038 and has been prepared in line with the following stages:
- Issues and Strategic Options;
 - Preferred Scale and Distribution of Development;
 - Preferred Sites;
 - Preferred Strategic Sites;
 - Regulation 18 Pre-Submission Draft; and
 - Regulation 19 Pre-Submission Draft.
- 2.2 Each stage was subject to public consultation to which MOD provided representations. SC and the MOD also undertook ongoing proactive engagement and discussions regarding RAF Cosford during the wider Local Plan Review process.

3. RAF Cosford – Site Summary

- 3.1 Defence activity at RAF Cosford dates back over 80 years to the 1930s. As part of work on the RAF Expansion Plan undertaken in the pre-WW2 period, a requirement was identified for additional aircraft storage and repair facilities and a network of Aircraft Storage Units (ASUs). A site in Shifnal, Shropshire was selected for the development of an ASU. In addition to this, the RAF's existing training units were becoming overwhelmed by the increase in manpower requirements and the decision was made to create Technical Training Schools at the ASUs in order to ease manpower and knowledge gaps.
- 3.2 Building at Cosford started in August 1937 and RAF Cosford officially opened in 1938. The RAF's No 2 School of Technical Training was formed on 15 July 1938. By the outbreak of WW2, Cosford had 3,580 trainees consisting of apprentices in the trades of (Fitter) Engines, Airframes, Armourers, plus a significant number of Flight Mechanics and Flight Riggers.

- 3.3 In recent years, the site has been recognised as playing an important part of the Defence Estate Optimisation Programme (DEOP) which was mobilised in order to deliver a smaller but better Defence estate to support military capability. RAF Cosford has been identified as a “Receiver Site” within DEOP which means that it will have an important role to play in the future optimisation of the Defence estate and there is an enduring, long-term Defence requirement for the site. This latter point was emphasised in a response to a Parliamentary Question from Mark Pritchard MP on 25 April 2022 (<https://questions-statements.parliament.uk/written-questions/detail/2022-04-25/158902#>).
- 3.4 The site forms a major part of the Defence College of Technical Training (DCTT) and it plays a vital part in delivering the RAF’s mission to deliver flexible, affordable, modern and effective technical training that meets the needs of the UK’s Armed Forces now and into the future. There are a number of units based at the site, including those associated with DCTT and a number of lodger units. The nationally renowned Royal Air Force Museum is also located at RAF Cosford. The site is well utilised, depending on throughput between 2,500 to 3,000 people are located on the site at any one time (excluding visitors to the RAF Museum).
- 3.5 The Midlands Air Ambulance Charity (MAAC) is also currently located at RAF Cosford and has been for a number of years, with the site being the location of one of its three helicopters. The MAAC’s new HQ building which falls within the proposed Strategic Site allocation on non-MOD land is in the process of being constructed and is understood to be expected to be completed in 2023 after which the MAAC will relocate.
- 3.6 As part of work on formulating a strategy for the future expansion of the site, in 2022 MOD will produce an Establishment Management Plan (EMP) for RAF Cosford. An EMP is a 25-year infrastructure investment strategy which provides a vision and masterplan for a site, ensuring:
- That development supports current and future Defence requirements and national commitments;
 - That MOD supports the provision of high-quality Defence environments;
 - The targeting of investment to minimise risks of building operation; and
 - The optimisation of utilisation and occupancy costs.
- 3.7 EMP’s consider issues such as (but not limited to) operational requirements, masterplanning, net zero carbon, planning and regulatory compliance, capital / revenue costs, transport, ecology and utilities.

4. Proposed RAF Cosford Strategic Site

- 4.1 Through the consultation process undertaken to inform the Local Plan Review and proactive discussions with the MOD and other occupiers of the RAF Cosford Strategic Site, a number of development aspirations were identified for RAF Cosford, both with regard to MOD and with regard to other occupiers of the site. These included:

- Enhancement of RAF Cosford's role as a centre of excellence for both UK and International Defence Training.
 - Opportunities to co-locate other MOD units and activities onto the site.
 - Plans for the expansion of the RAF Museum Cosford.
 - Plans to form a new headquarters for the MAAC.
- 4.2 Plans to form a specialist aviation academy are no longer progressing. However as highlighted above, the site remains a focus for the MOD in terms of providing a centre of excellence for both UK and International Defence Training.
- 4.3 To support both the continuing operation of RAF Cosford and these various activities, there will be a need to intensify the use of existing facilities and undertake new development to provide additional necessary facilities.
- 4.4 Following careful consideration of the various development aspirations, SC concluded that they were unique to this location, given the existing built form, facilities and activities already occurring on the RAF Cosford Site; represented locally, regionally and nationally significant opportunities; and that they would positively contribute towards ensuring the long-term sustainability of both the site and its occupiers. SC also concluded that these opportunities could contribute to the emerging vision, objectives and spatial strategy within the Local Plan Review and facilitate the achievement of the Economic Growth Strategy for Shropshire.
- 4.5 The ongoing Local Plan Review included a detailed review of Green Belt boundaries, informed by proportionate and robust evidence in the form of a Green Belt Assessment and Green Belt Review. These assessments indicated that RAF Cosford:
- Makes at most a moderate contribution to the nationally identified purposes for Green Belt. The assessment of the performance of parcels against purpose 5 is not possible in a meaningful way.
 - Would result in low harm or low-moderate harm to the Green Belt (the proposed MAAC headquarters site would represent moderate-high harm to the Green Belt).
- 4.6 Following further discussions, SC concluded that the most effective means of facilitating the various development aspirations for the RAF Cosford site would be to identify a significant proportion of it as a proposed Strategic Site and remove it from the Green Belt.
- 4.7 In reaching this conclusion, SC carefully considered all other reasonable options including consideration of brownfield and under-utilised land (although in this context it was noted that much of the RAF Cosford Site is brownfield land), optimising density, and alternative options (including not releasing the site and different approaches to releasing land from the Green Belt at the site). SC also recognised that there would be a need to identify exceptional circumstances to justify the release of the land from the Green Belt, but considered that such circumstances existed, due to the nature of the site and the identified development aspirations.

- 4.8 As such, SC specifically consulted on this approach within the Strategic Sites consultation. Subsequently, SC prepared a draft overarching strategy and detailed policy requirements for the proposed RAF Cosford Strategic Site and consulted upon these proposals. This stage of consultation was informed by a Green Belt Exceptional Circumstances Statement¹ which summarised the process undertaken to consider alternative options to that proposed and included identification of the proposed exceptional circumstances to justify the release of the proposed RAF Cosford Strategic Site from the Green Belt.
- 4.9 The MOD submitted responses to these consultations and SC has considered these alongside those from other parties, to inform the development of subsequent proposals for the RAF Cosford Strategic Site. As a result, a number of MOD concerns have already been addressed. Therefore, only a few outstanding matters were included within the MOD's Regulation 19 representations.

5. Value of the Removal of RAF Cosford from the Green Belt

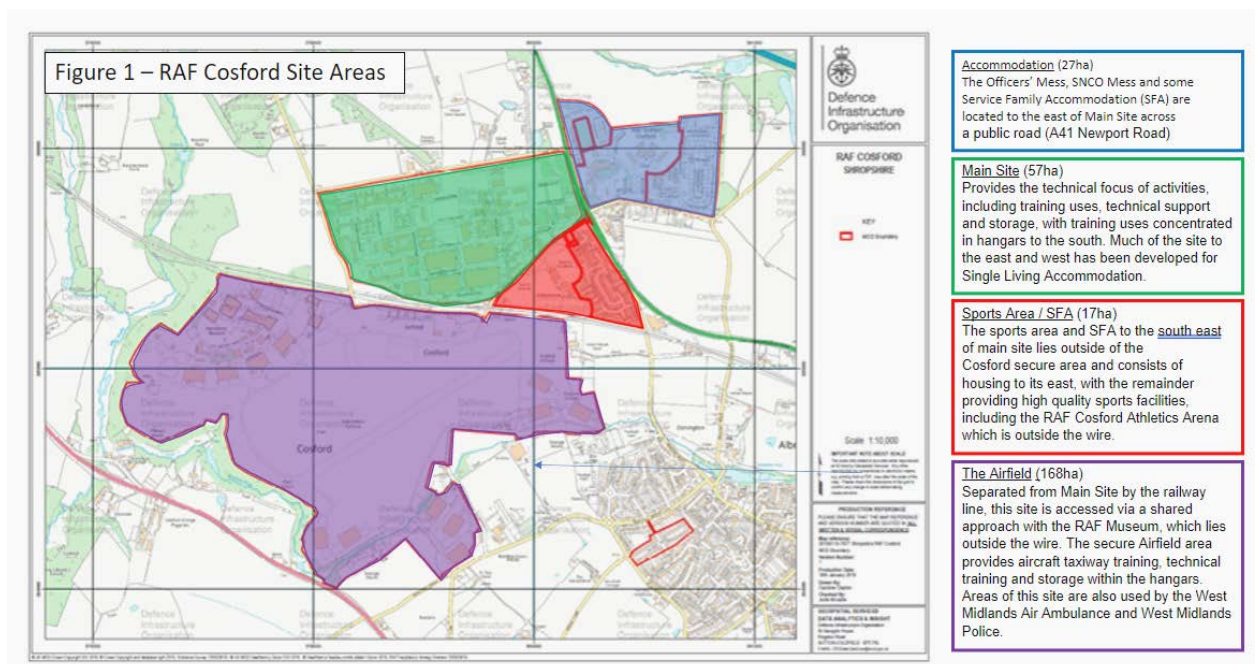
- 5.1 The proposed RAF Cosford Strategic Site is addressed within draft Policy S21 of the Draft Shropshire Local Plan. It proposes to remove the majority of RAF Cosford from the Green Belt, with land south-east of the runway remaining within the Green Belt. The MOD preference was for the whole site to be removed from the Green Belt due to it providing the most clarity for development on the site in the future. However, SC was of the opinion that this land performs an important role in creating separation between the RAF Cosford Site and Albrighton, whilst this is not specifically a Green Belt factor it is a planning consideration. Following discussions between MOD and SC, the MOD agreed to the smaller footprint reflected within this draft policy and as illustrated on the draft policies map.
- 5.2 The West Midlands Green Belt, whilst first proposed in 1955, was not formally approved until 1975. Given that RAF Cosford opened in 1938, this clearly demonstrates that RAF Cosford pre-dates the West Midlands Green Belt by many years and that Defence was an established use of the site long before the Green Belt was designated.

Supporting future development and ongoing investment

- 5.3 The removal of the majority of RAF Cosford from the Green Belt would reduce planning risk and provide greater confidence, certainty and flexibility for development that supports National and International Defence, the delivery of future development aspirations and could also help to further support the long-term future of the site.

¹ This Exceptional Circumstances Statement was subsequently updated to inform the Regulation 19 Pre-Submission Consultation on the draft Shropshire Local Plan. This updated Green Belt Exceptional Circumstances Statement (**EV051**) is available at: <https://shropshire.gov.uk/media/20520/green-belt-revised-exceptional-circumstances-statement-december-2020-ev051.pdf> and forms part of the evidence base for the draft Shropshire Local Plan.

- 5.4 The whole of RAF Cosford is currently located within the Green Belt. The presence of this designation places significant restrictions on future development, particularly where it is considered to be inappropriate development in the Green Belt, as very special circumstances need to be demonstrated in order to justify such development.
- 5.5 Both the adopted Shropshire Core Strategy (2011) and SAMDev Plan (2015) recognise RAF Cosford as a major developed site within the Green Belt. SAMDev Plan Policy MD6: Green Belt, states: “*RAF Cosford and museum are identified on the Policies Map as a major developed site within the Green Belt in which additional development for military uses... would be appropriate...*”
- 5.6 The major developed site status and the fact that the site is predominantly previously developed land does provide some flexibility. However, this flexibility, as set out in paragraph 149 of the National Planning Policy Framework (NPPF), is fairly limited and as a result the Green Belt designation does ultimately restrict the future development potential of RAF Cosford.



- 5.7 Figure 1 above highlights the main areas which together comprise RAF Cosford. The areas of the site located to the north of the railway line, are already significantly built-up with the remaining open areas generally in use for sports provision. There are limited opportunities for future development, other than the redevelopment of existing buildings, or development on existing sports pitches. Therefore, future expansion requirements at RAF Cosford are likely to increasingly need to consider currently undeveloped land on the airfield site south of the railway line. Such proposals would have a higher planning risk as they would be less likely to benefit from the provisions within the NPPF for previously developed land in the Green Belt.
- 5.8 There is an apparent conflict here; whilst MOD has designated RAF Cosford as a 'Receiver Site' within DEOP and a 'Core Site' with a long-term role for Defence, the

current higher planning risk for development proposals, particularly on the airfield site, could potentially see RAF Cosford being discounted as a location for significant projects / proposals in the future. Removing the Green Belt designation from the site would help to remove this conflict by providing certainty, confidence, flexibility for development proposals and ultimately supporting investment in the site. This would also assist with meeting Paragraph 97 of the NPPF which states:

“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by... b) recognising and supporting development required for operational defence and security purposes...”

Exceptional nature of the development proposals

- 5.9 A number of unique development aspirations have been identified for the RAF Cosford Strategic Site, including enhancement of RAF Cosford’s role as a centre of excellence for both UK and International Defence Training, opportunities to co-locate other MOD units and activities, plans for the expansion of the RAF Museum Cosford and plans to form a new headquarters for the MAAC.
- 5.10 These development aspirations are considered locally, regionally and nationally significant opportunities and as a result of the existing facilities and operations that are occurring on the RAF Cosford site, are considered unique to this location.
- 5.11 To support these various activities, as well as the continuing operation of the establishment, there will be a need to intensify the use of existing facilities and undertake new development to provide additional necessary facilities.

Maintaining a sustainable site – now and in the future

- 5.12 RAF Cosford, whilst primarily a Defence facility, also houses the renowned RAF Museum Cosford and areas of the site are also used by the West Midlands Air Ambulance Charity and West Midlands Police.
- 5.13 It is considered that there are significant benefits resulting from the co-location of these various and complementary uses on the site. Removing the site from the Green Belt will facilitate the various development aspirations of these organisations, by providing:
- Greater confidence in the ability of the site to accommodate the identified development aspirations.
 - Greater certainty regarding the ability to undertake the development associated with the future aspirations for the site and any related enabling works.
 - Greater flexibility regarding the use of land.

- 5.14 In this way it will support the decision making process applied by the various occupiers of the site when considering whether to invest in the site and provide greater confidence that they will remain on the site in the longer term.
- 5.15 This will result in the continuation of the benefits achieved by the co-location of the various and complementary uses on the site, support the achievement of a sustainable pattern of development, and deliver undeniable benefits to the long-term sustainability of site owners / users, crucially the site itself, and the surrounding area.
- 5.16 Furthermore, the site itself is considered to represent a sustainable location for development, benefitting from strong public transport links, with Cosford Railway Station located at the site and several local bus stops located on the A41 in proximity.

Support for wider economic growth objectives

- 5.17 Removing the RAF Cosford Strategic Site from the Green Belt will enable the numerous and complementary development aspirations identified for the site to occur. In turn, achievement of these development aspirations will complement and facilitate delivery of the Economic Growth Strategy for Shropshire (2017-2021) and the objectives of the Shropshire Local Plan.
- 5.18 Specifically, the Economic Growth Strategy for Shropshire (2017-2021) seeks to prioritise investment in strategic locations and growth zones along strategic corridors. It also identifies a number of key growth sectors for the Shropshire economy, including ‘advanced manufacturing including engineering, agri-food and agri-tech’.
- 5.19 RAF Cosford is located on the M54/A5 Strategic Corridor, as such the achievement of the development aspirations (which are locally, regionally and national significant) for the site will promote the importance of this corridor and perhaps others in Shropshire. Furthermore, although the identified development aspirations for the RAF Cosford Strategic Site are for Defence and charity purposes, they are directly related to the key growth sector ‘advanced manufacturing including engineering, agri-food and agri-tech’ and would provide education opportunities, access to a skilled workforce, opportunities for the co-location of supply chain and opportunities for complementary employment offer which would all contribute to the achievement of the economic growth strategy. These same factors would also contribute to the achievement of the draft Shropshire Local Plan.

Existing nature of the site in terms of meeting Green Belt objectives

- 5.20 As previously referenced, the ongoing Local Plan Review included a detailed review of Green Belt boundaries, informed by proportionate and robust evidence in the form of a Green Belt Assessment and Green Belt Review. These assessments indicated that RAF Cosford:

- Makes at most a moderate contribution to the nationally identified purposes for Green Belt. The assessment of the performance of parcels against purpose 5 is not possible in a meaningful way.
- Would result in low harm or low-moderate harm to the Green Belt (the proposed MAAC headquarters site would represent moderate-high harm to the Green Belt).

5.21 Whilst this in and of itself is not considered a defining exceptional circumstance, it does complement the wider factors identified.

6. Matters Agreed

6.1 SC and the MOD agree that the various development aspirations of the MOD identified for RAF Cosford represent locally, regionally and nationally significant opportunities.

6.2 SC and the MOD agree that the identification of the RAF Cosford Strategic Site will effectively facilitate the delivery of these opportunities, and in so doing, will positively contribute towards ensuring the long-term sustainability of both the site and its occupiers, could contribute to the emerging vision, objectives and spatial strategy within the Local Plan Review and facilitate the achievement of the Economic Growth Strategy for Shropshire. The value of removing the site from the Green Belt is documented above.

6.3 The MOD recognise the need to deliver appropriate and necessary supporting infrastructure in accordance with the proposed development guidelines within draft Policy S21, informed by Masterplanning, relevant assessments and the Planning Application process.

6.4 Within its Regulation 19 representations, the MOD highlighted its support of the proposed RAF Cosford Strategic Site and draft Policy S21 in principle, which is considered justified, effective and consistent with national policy. As such, there are no matters of dispute on the principle of the policy and the MOD can confirm it is, in principle, viable and deliverable.

6.5 Within its Regulation 19 representations, the MOD also welcomed the engagement that has taken place between SC and MOD to date on the detailed wording of the proposed policy requirements. However, with respect to the wording of specific clauses contained within the detailed policy requirements, there are a limited number of areas of disagreement.

6.6 Following on from further discussion between MOD and SC, MOD has agreed to withdraw its Regulation 19 response with respect to Part 4, Criterion M of Policy S21. Both MOD and SC agree that the term “appropriate sustainable drainage” within this part of the policy will ensure that only relevant development proposals will trigger the need for sustainable drainage requirements.

6.7 Within the context of MOD’s Regulation 19 response to Criterion N of Policy S21, SC has recognised that improvements undertaken under this criterion must not impede operational activities at RAF Cosford. As such a modification on this issue is proposed stating “Any such provision should not impede operational activities at RAF Cosford”. This proposed modification is captured within the schedule of proposed main modifications (**GC4m**). MOD supports this proposed modification which goes some way to resolving its concerns regarding this Criterion.

7. Matters in Dispute

7.1 The limited remaining matters of disagreement that exist between the MOD and SC with respect to the proposed RAF Cosford Strategic Site and to Policy S21 – Strategic Site: RAF Cosford can therefore be summarised as follows:

MOD Comments	SC Response
<p>With regard to Part 4 of draft Policy S21, it is unclear how a coordinated approach can be achieved, it is unclear what proactive engagement represents and it is important that masterplanning processes do not restrict development to support the ongoing activities at the site from taking place.</p> <p>The MOD would therefore like to see the following amendments to the initial paragraph of Part 4 of the draft policy, to ensure that the policy is appropriately clear, justified and effective:</p> <p><i>“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 <u>proposals for the site</u> will comply with the following site guidelines:”</i></p>	<p>SC considers it is important and appropriate for the various components of the RAF Cosford Strategic Site to be coordinated and complementary, which will be achieved through the strategic planning, planning application and masterplanning processes.</p> <p>It is also considered appropriate to expect proactive engagement to occur on masterplans.</p>
<p>Criterion N of Part 4 of draft Policy S21 has the potential to be onerous and confusing and would benefit from some further clarification to ensure that it is fully justified.</p> <p>It applies to “any new development proposals”, but as an existing site RAF Cosford is likely to have both major and minor development. It could require the MOD to make improvements to Green Belt that is not within its ownership. It could be read as requiring a number of</p>	<p>SC considers it is appropriate and consistent with national policy for any new development at RAF Cosford to contribute to opportunities to reinforce Green Belt boundaries, reduce and mitigate impacts on the Green Belt and enhance beneficial use of the Green Belt. This can effectively be achieved through a coordinated approach led through the strategic planning, planning application and masterplanning processes.</p>

<p>improvements for each development, so additional flexibility is required to ensure the most appropriate improvement can be considered on a case by case basis.</p> <p>As such, the MOD requests that this criterion is amended along the lines of:</p> <p><i>"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 <u>accordance with</u> Green Belt Policy SP11. Compensatory provision to the <u>remaining</u> Green Belt at <u>RAF Cosford</u> will <u>could</u> include appropriate additional planting to improve visual amenity and biodiversity and <u>or</u> creation of linkages to green infrastructure networks and corridors beyond the site.</i></p>	<p>To provide certainty that compensatory improvements can be provided, it is considered appropriate to indicate that specific improvements will occur, however this does not necessarily mean that other improvements cannot occur.</p>
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8. Endorsement

Ministry of Defence		
Name and Position	Signature	Date
David Brewer – Defence Infrastructure Organisation		12/05/2022

Shropshire Council		
Name and Position	Signature	Date
Edward West - Planning Policy and Strategy Manager		12/05/2022