

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	A0633
Matter	7
Relevant questions nos	S21 1-4

*Your unique reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/earlier-regulation-18-plan-making-stages-of-consultation/regulation-19-pre-submission-draft-of-the-shropshire-local-plan-consultation/>

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7.1 On the loss of Green Belt at RAF Cosford, the Council refer to this being necessary to support the role, vitality and long term sustainability of the existing site and occupiers, and will support and facilitate an extensive range of development identified for the RAF. The removal of RAF Cosford from the Green Belt to meet RAF and Museum associated needs was considered when the former Bridgnorth District Local Plan was under consideration. Similar arguments for removal were made then as now put forward by the Council. The Inspector discounted those arguments then and accepted that to retain planning control over the site, it should remain in the Green Belt with an appropriate policy to enable the type of developments that the Council now say would need to be facilitated by Green Belt removal. Since then, major new developments for the RAF and the Museum have been permitted and completed despite the site being in the Green Belt. The evidence is clear that the site's inclusion in the Green Belt has had no adverse impact on the effectiveness of the RAF and Museum to develop the range of developments referred to by the Council as constituting exceptional circumstances. There has been no change in policy since the matter was previously considered through the local plan process to now justify releasing the site from the Green Belt to meet RAF "identified" needs as claimed by the Council.

7.2 The Council also proposed taking land out of the Green Belt to meet the needs for a new Air Ambulance base. However, they have recently granted permission for the new base in the Green Belt as an exceptional circumstance and construction is under way. There is, therefore, no longer any exceptional circumstance to remove this land from the Green Belt as the development is already under way. The fact that in their exceptional circumstances case, the Council argue that Green Belt removal is required to facilitate the development of the base, yet have managed to still permit the scheme whilst it is still in the Green Belt shows the fallacy in their exceptional circumstances evidence and is further proof that there is no Green Belt obstacle to facilitating any of the identified RAF and Museum development needs outlined in the Council's evidence. The Council in their post Reg19 comments and since their permission for the new Air Ambulance base, have failed to explain why it is still necessary to remove the land from the Green Belt when the development is already under way.

7.3 The Council state that removal of the Green Belt here is the most effective means to facilitate military and charitable activities on the site. However, it is clear from the evidence given above and the Council's decision to grant permission for the charitable Air Ambulance whilst still in the Green Belt, that this exceptional circumstance used by the Council is unsustainable and unjustified by the specific evidence from past planning decisions on the site. Similarly, even if there was considered to be an overwhelming case for removing the land from the Green Belt to meet these specific military and charitable needs, this could simply be done by removing the site from the Green Belt for these development purposes. The fact that the Council have gone much further and want not only to remove the site from the Green Belt but to name the site as a Strategic Site, shows that their development

aspirations for the site go much further than those specified as the reason for its removal.

7.4 Indeed, the Council refer to also allowing “appropriate new development”, though they fail to explain what they mean by “appropriate”. Proposing the land released from Green Belt as a Strategic Site, would enable the Council to allow a wide range of non-military/charitable “non-identified” developments at its will. The Council’s clear intention for removing the site from the Green Belt and then giving it Strategic Site status is not just to allow for the military/charitable identified developments put forward as exceptional circumstances, but to give the Council the flexibility to allow it to permit as being within policy, any employment development it wanted.

7.5 The Strategic Site allocation is in effect proposing the site as an employment site, giving unrestricted planning power to the Council to allow non-military/charitable employment development as this would be permitted under the other employment policies in the Plan. No justification has been given by the Council for this aspect of the removal of the site from the Green Belt and its subsequent designation as a Strategic Site which conflicts with their other arguments for Green Belt removal. As such, it is not considered that exceptional circumstances have been adequately demonstrated for the removal of the site from the Green Belt for its designation as a strategic development site.

7.6 There is a further uncertainty and inconsistency in the Council’s intended proposals for taking the land out of the Green Belt. In GC4 paragraph 242, the Council say “although with an allowance for the Strategic Settlements and Strategic Site, which are considered to represent future urban areas”. As Cosford is the only Strategic Site, it is clear from this that the Council are seeking to develop Cosford as a future urban area, which means substantial housing, employment, retail etc, which it can only achieve by taking the land out of the Green Belt. However, they have not given this as an exceptional circumstance, simply referring to military and charitable developments, as they know that they cannot justify removing the land from the Green Belt for development as an urban area at this time, so they are using the military/charitable argument as a means to get their wider urban area aim for the site achieved through the back door once the land is no longer Green Belt.