

# Statement of Common Ground Addendum Clive Barracks

Shropshire Council and Defence Infrastructure  
Organisation (DIO)

June 2023

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# 1. Introduction

1.1 This Statement of Common Ground Addendum (Addendum) has been prepared jointly between Shropshire Council (SC) and The Defence Infrastructure Organisation (DIO) in respect of the proposed allocation of the Clive Barracks Strategic Settlement 'the site' and draft Policy S19 – Strategic Settlement: Clive Barracks. It supplements a previous Statement of Common Ground (SoCG) prepared in May 2022 (Examination Document Ref: SoCG04) and has been prepared to address the further questions raised by the Inspectors in their Interim Findings (ID28), dated 15th February 2023. The Addendum should be read in conjunction with the previous May 2022 Statement of Common Ground.

1.2 The Inspectors advised as follows in respect of the land at Clive Barracks (referred to as Tern Hill by the Inspectors):

*"49. Turning to Tern Hill and policy S19, we have concerns about the deliverability of the affordable housing that would be required in connection with the development of this proposed site allocation given the evidence set out in the Council's Viability Study 2020 (EV115.01) and the fact that the trajectory shows that 400 of the 750 proposed dwellings will be delivered after the Plan period.*

*50. This also leads us to find that there is a lack of evidence to demonstrate that this proposed allocation will be capable of supporting the necessary infrastructure and services planned. Given the site's location away from any main settlements, it is important that it contains a range of services to limit trips by private car. Therefore, we require evidence which demonstrates that the appropriate necessary infrastructure would be delivered at the appropriate stages in the delivery of this site to serve its occupants.*

*51. Finally, as discussed in detail at the relevant hearing session we have some concerns about the vagueness of some of the policy wording in policy S19. The Council agreed it would look at this with a view to improving its precision and certainty for the benefit of developers and local residents. These changes should be advanced as MMs".*

1.3 To address the above concerns, the Addendum SoCG is structured as follows:

- Deliverability of affordable housing, including the timing of this;
- Evidence demonstrating the site is capable of supporting infrastructure and services;
- Confirmation of necessary infrastructure delivery at appropriate stages of the scheme;
- Amendments to the wording of Policy S19.

- 1.4 Clive Barracks is owned by the Ministry of Defence (MOD) and forms part of the MOD's commitment to provide land for 55,000 homes to contribute towards the Government's housing targets. The site has been identified for release as part of the Better Defence Estate Initiative by the MOD and has a programmed disposal date of 2029.
- 1.5 The DIO are fully committed to the delivery of housing and employment at Clive Barracks as part of a new Strategic Settlement, during the proposed Plan period (to 2038) and beyond.
- 1.6 As detailed within this document and within the earlier Statement of Common Ground, May 2022, an extensive evidence base that considers on and off-site constraints has been prepared which confirms that a scheme of 750 dwellings, 5.75 hectares (ha) of employment land, a range of local services and facilities, necessary infrastructure and extensive open space is deliverable.

## 2. Deliverability of Affordable Housing

- 2.1 As the previous SoCG outlined at paragraph 5.3, DIO and Shropshire Council are in agreement that the mix of housing (including affordable housing) to be provided on site will be considered and finalised at the time a planning application is made.
- 2.2 The Viability Assessment undertaken to support the draft Shropshire Local Plan concludes that with 10% affordable housing, compliance with wider policy requirements, provision of identified S106 requirements and provision of CIL at the prevailing rate, that the Clive Barracks site would result in a Residual Value that is less than the identified Benchmark Land Value, however this Residual Value would remain around 3 times higher than the existing use value.
- 2.3 This assessment was predicated on an assumption that the site would include S106 contributions of £9m plus CIL at prevailing rates. The Viability Study specifically recognised within paragraph 12.79 that it is unlikely that the full S106 and CIL will be required. Specifically, paragraph 12.79 stated *“currently subject to CIL at the prevailing rates. This has been discussed with the Council, who has acknowledged that it would expect the s106 requirements to take into account that some of the infrastructure in the area of the specific sites could be delivered through CIL so it is unlikely that the requirement would be for the full levels of s106 contributions and CIL”*.
- 2.4 Recognising this, and the proposed policy approach to infrastructure provision as captured within draft Policy DP25, it is clear that the assessment has applied the ‘precautionary principle’ with regard to these assumptions. On this point it should also be acknowledged that deductions for existing ‘in use’ floorspace (Vacant Building Credit) may mean that CIL contributions on the site are reduced.
- 2.5 The Viability Assessment concludes in para 10.85 that *“It is clear that these sites have capacity to bear both affordable housing and developer contributions. There is no doubt that the delivery of any large site is challenging so, rather than draw firm conclusions at this stage, it is recommended that the Council engages with the owners in line with the advice set out in the Harman Guidance (page 23): Landowners and site promoters should be prepared to provide sufficient and good quality information at an early stage, rather than waiting until the development management stage. This will allow an informed judgement by the planning authority regarding the inclusion or otherwise of sites based on their potential viability”*. This conclusion applies to all the strategic sites across the Council’s administrative area, including Clive Barracks where the Council is already undertaking positive discussions with the DIO.
- 2.6 The need for ongoing conversations about the deliverability of affordable housing on site is necessary as the first homes at Clive Barracks will not be delivered until 2030. It is not possible to predict the tenure of the affordable housing which will be needed at that time nor dwelling size. In

addition, development financing may or may not have evolved over this period. DIO and Shropshire Council are therefore committed to an ongoing dialogue to ensure the viability and delivery of affordable housing.

- 2.7 Regarding the timescales for the delivery of affordable housing, we note the Inspector's concerns comment that the indicative housing trajectory shows 400 of the proposed dwellings will be delivered beyond the plan period, which we assume has given rise to concerns about delivery of affordable homes onsite during the plan period.
- 2.8 The DIO and Council are in agreement that the delivery of affordable housing both within the plan period and post plan period will be appropriately phased and agreed through further discussion and by a comprehensive phasing strategy which will be prepared for the site at planning application stage (as proposed through the amended policy wording) and also through any further discussions (if necessary). Affordable housing will be delivered within the proposed Plan period and beyond at appropriate stages of the development and in line with other new infrastructure to be delivered onsite.

### 3. Evidence

- 3.1 We note the Inspector's concerns that there is a lack of evidence to demonstrate that this proposed allocation will be capable of supporting the necessary infrastructure and services planned.
- 3.2 However, as highlighted within the previous SoCG (May 2022), an extensive evidence base has been prepared by the DIO, and reviewed in detail by the Council, that considers on and off-site constraints and necessary infrastructure and mitigation required to deliver the scheme. The evidence confirms that a scheme of 750 dwellings, 5.75 hectares (ha) of employment land, a range of local services and facilities, necessary infrastructure and extensive green open space **is deliverable**.

#### Topographical Survey

- 3.3 A Topographical Survey has been undertaken to inform other specialist assessments and surveys.

#### Highways Report and Technical Note

- 3.4 The Highways Report tests a 'worst case' scenario of 1,000 dwellings being delivered on the site. The proposed capacity of the site is lower at circa 750 dwellings.
- 3.5 The report confirms that vehicular access to the site can be achieved via the existing staggered junction arrangement which currently serves the site. The modelling work which has been undertaken indicates that this junction will continue to operate within capacity in all future year scenarios.
- 3.6 The A41/A53 Tern Hill roundabout has also been assessed. The roundabout currently operates over capacity. The Highways Report proposes improvements, within highways land, to the roundabout to increase its capacity which provides a nil detriment solution when modelled with the proposed development in place. The works would be captured through a S106 and S278 legal agreement and delivered in line with the recommendations agreed through a future Transport Assessment and discussions with the Highways Authority and National Highways (as appropriate).
- 3.7 The report concludes that there are no transport reasons as to why the site should not be re-developed for residential-led use.

#### Noise Assessment

- 3.8 Initial Noise Monitoring was undertaken in September 2018. The main noise sources in the area have been identified as road traffic on the A41, which runs through the centre of the site, and helicopter movements at the adjacent RAF Tern Hill Airfield.

- 3.9 The noise assessment focuses on establishing current daytime and night-time noise levels on site to determine whether appropriate noise mitigation measures are likely to reduce the noise to within acceptable levels.
- 3.10 The assessment concludes that with careful consideration to the design of the site, together with appropriate glazing and ventilation, internal daytime and night-time noise level criteria could be met across the entire site. Similarly, with appropriate use of acoustic barriers, daytime noise levels in gardens facing out towards the A41 should meet the external target noise levels across the site.
- 3.11 In respect of the adjacent Airfield, with careful consideration to the layout of the site (as reflected in the Indicative Masterplan), particularly in relation to the proposed land uses adjacent to the Airfield, external noise level targets should be achieved in garden areas for all of the proposed dwellings. Furthermore, the noise mitigation requirements are likely to be much lower for the proposed dwellings that will lie further into the site (and away from the Airfield) as there will be significant acoustic screening from the development itself.
- 3.12 The proposed mitigation is not onerous and will be delivered in accordance with phasing conditions agreed with the Councils Environmental Health Officer.
- 3.13 Further Noise Monitoring of the Airfield has been undertaken. The data collected will inform the future development of the site layout and ensure that the mitigation methods remain appropriate.

#### **Flood Risk and Drainage Scoping Study**

- 3.14 A Flood Risk and Drainage Scoping Study has been undertaken to consider the possible sources of flood risk and the sustainable drainage opportunities associated with the proposed development at Clive Barracks.
- 3.15 In respect of flood risk, the evidence indicates that the site is not at significant risk of flooding. Two existing ordinary watercourses are located within the vicinity of the site which are not accounted for on the EA Flood Map. Hydraulic modelling of these watercourses will be undertaken in preparing a full Flood Risk Assessment to accompany any future planning application.
- 3.16 Due to the proposed increase in impermeable area, a sustainable drainage strategy which incorporates SuDS into the development will be prepared and supported by infiltration testing and detailed ground investigation. An indicative Surface Water Drainage Strategy has been prepared and accompanies the Flood Risk and Drainage Scoping Study.



- 3.17 In respect of foul water drainage, it is anticipated that a foul water gravity connection will not be possible for all of the site and pumping stations may be required. This is not an unusual practice and the existing foul sewage works will remain operational throughout the development to ensure there is no interruption to the foul sewerage network for the existing properties neighbouring the site. The infrastructure will be phased as required to facilitate delivery.

#### **Foul Water and Utilities Assessment**

- 3.18 A Foul Water and Utilities Assessment has been prepared to understand the locations of existing utilities apparatus in the vicinity of the site and to provide an account of the viability of servicing the proposed development with suitable mains services infrastructure.
- 3.19 The responses received from the relevant electricity, clean water and gas network operators indicates that there is sufficient capacity within the surrounding network to serve the proposed development. In respect of the gas network, 150 dwellings can be delivered ahead of reinforcement works. The phasing plan for the site will reflect this and the proposed upgrades have been costed.
- 3.20 A high-pressure oil pipeline runs within the north-east of the site. The Indicative Masterplan makes provision for a no build easement in this location and as such the oil pipeline can remain in-situ.

#### **Preliminary Ecological Appraisal**

- 3.21 A Preliminary Ecological Appraisal has been undertaken for the site. It confirms that a small area of the RAF Tern Hill Local Wildlife Site is situated on-site whilst the River Tern Local Wildlife Site is located adjacent to the north-eastern site boundary. The Indicative Masterplan safeguards these sites from development through the provision of a buffer of at least 15 m wide. With this proposed mitigation in place the designated sites are unlikely to pose a significant constraint to development at the site.
- 3.22 An area of Ancient Woodland is present in the west of the site which will be retained, protected and buffered from any future development. The Ecological Appraisal identifies that at least a 15 m buffer should be retained between the Ancient Woodland and the development and that a 30 m buffer is desirable. The Indicative Masterplan incorporates the desirable 30 m buffer.
- 3.23 Several of the on-site woodland patches and hedgerows are likely to qualify as Priority Habitat, however, these can be incorporated within a sensitive scheme layout without posing a significant constraint to development. The other areas of woodland are recommended to be separated from any future development by a 10 m buffer (also shown on the Indicative Masterplan). Other habitats present on-site are considered unlikely to pose a significant constraint to future development of the site.

- 3.24 Further species-specific survey work will be undertaken at outline planning application stage to fully understand any mitigation which may need to be incorporated into the future scheme. It is however considered that the potential species groups identified in the Preliminary Ecological Appraisal are unlikely to pose an overriding constraint to development.
- 3.25 The Appraisal notes that there are opportunities to deliver ecological benefits on site through the enhancement of existing grassland, introducing an appropriate management regime for the areas of woodland and increasing the extent of species rich hedgerows.

### **Landscape and Visual Impact Assessment**

- 3.26 A Landscape and Visual Impact Assessment has been prepared which provides a baseline landscape assessment of the site and surrounding area and assesses the impact of the proposals, based on the Indicative Masterplan.
- 3.27 In terms of the southwestern parcel of the site, which comprises the existing Barracks, the existing large scale built structures along the southern site boundary form prominent features within the wider landscape, with the southern site boundary at this point being largely devoid of vegetation structure, allowing for more open views. The western and northern site boundaries are lined by mature native tree belts and hedgerows which afford a strong degree of visual and physical containment to the site in views from the north and west.
- 3.28 The assessment concludes that the Indicative Masterplan has been carefully designed to demonstrate how the proposed development could complement the receiving landscape setting and seek to retain all key vegetation structures, where appropriate, to assist in the successful integration of the proposals into the receiving visual environment.

### **Heritage Statement and Geophysical Survey**

- 3.29 A Heritage Statement and Geophysical Survey have been prepared to examine the potential for below ground archaeology and assess the potential impact of the development on designated and non-designated heritage assets.
- 3.30 In terms of archaeology, the Statement concludes that the archaeological potential of the site is considered to be low to moderate, with some areas of higher potential in the south central and north western areas of the site. As such it is considered that there is a fair likelihood that development may directly impact upon archaeological remains. However, it should be noted that these are only likely to be of local to regional significance, associated with Roman roadside activity, Medieval and later farming practices and the use of the site by the RAF and Army during the 20th Century. A further

stage of trial trenching is considered likely, prior to achieving full planning permission for development on the site.

- 3.31 Regarding Designated Heritage Assets, the north-eastern most part of the site is considered to have the highest potential to impact on the setting of designated heritage assets (the Scheduled Ringwork and Bailey Castle and Grade II\* Buntingsdale Hall and associated Grade II Listed Buildings). However visual connections between the site and the heritage assets are not strong and much of the area is already developed for housing (the Buntingsdale Estate).
- 3.32 The Indicative Masterplan retains a historic tree-lined avenue (along the northern side of Hedley Way), which once formed one of the main entrances to Buntingsdale Hall from the A41. The proposed development will impact negatively on the experience of travelling towards Buntingsdale Hall along this, however, because the setting of the Hall has already been eroded by existing housing (Buntingsdale Estate), the degree of harm to the setting of the Hall from this development will be minor (less than substantial).
- 3.33 In terms of Non-Designated Heritage Assets, the site contains parts of the 'Site of the Former RAF Ternhill' and the 'Gardens and Grounds of Buntingsdale Hall' as defined by the Shropshire Historic Environment Record. The Statement notes that it should be accepted that the operational buildings within the site have highly specific functions which are only able to accommodate changes of use in exceptional circumstances, and a degree of loss should be anticipated by the site's redevelopment. Demolition of any buildings associated with the WWII or earlier history of the site would be expected to be preceded by a programme of historic building recording.
- 3.34 Notwithstanding this, at detailed design stage, an opportunity may exist to retain elements of the former Barracks buildings, and verges and roads within the proposed residential areas. Such measures would reduce the degree of harm caused by the proposed development, notably if the final site layout retains an overall sense of the planned 'campus style' layout of the Barracks. This will be given due consideration during the future masterplanning process.

### **Arboricultural Survey**

- 3.35 The Indicative Masterplan has also been informed by a Tree Survey which has categorised the existing trees within the site and identified the root protection areas for these trees.

### **Preliminary Arboricultural Impact Assessment**

- 3.36 A Preliminary Arboricultural Impact Assessment has been prepared which assesses the Indicative Masterplan. The existing tree stock within the site represents a typical assemblage for the current

use, whereby existing areas of built form and hard surfacing are interspersed with established ornamental plantings set within maintained grassland areas.

3.37 The exceptions to this are areas of woodland that predate the site's current use. These comprise a parcel of Ancient Woodland (Grange Wood) and an established woodland belt (Mill Rough), which collectively define the site's north-western corner. Offsite, to the east, lies a further area of established woodland associated with Buntingsdale Hall (in addition to the avenue of trees within the site that are historically linked with Buntingsdale Hall).

3.38 There are no trees within the site which are afforded protection by a Tree Preservation Order.

3.39 As the Tree Survey has been undertaken during the early stages of design for the site, it has been used to inform the Indicative Masterplan. As such, although tree removals will inevitably be required to accommodate the development, it is anticipated that these can be focussed on lower quality components of the tree stock. Whilst the removal of some moderate quality trees is anticipated, this impact can be mitigated for in part by the provision of public access and appreciation of retained high quality tree cover within the future development.

3.40 Subject to ongoing arboricultural input during the detailed design stage, a sensitive scheme which retains the site's highest quality trees and important arboricultural features is achievable.

#### **Unexploded Ordnance (UXO) Assessment**

3.41 A UXO Preliminary Risk Assessment (UXO PRA) has been undertaken to assess the risk of the site being contaminated by unexploded ordnance.

3.42 The report confirms that there is no evidence that the site itself was directly affected by bombing in WW1 or WW2 and a threat from an unexploded bomb in previously undisturbed WW2 ground volumes may be reasonably discounted. In addition, the report finds that the potential for the site to contain Anti-Aircraft Artillery is very unlikely, albeit this can rarely be entirely discounted. Despite the military history of the site, it is considered that it is extremely unlikely that other UXO contamination events occurred onsite.

3.43 The Assessment concludes that UXO risk mitigation measures are not required to be in place prior to intrusive engineering works on the site. However, given the military activity on the site, it is considered prudent to deliver UXO Safety Awareness Briefings to inform construction personnel how to react if a suspicious item is discovered during site works.

### Phase I Ground Investigation

- 3.44 A Phase I Ground Investigation study has been prepared to identify any potential areas of contamination and whether there are any constraints on the proposed residential use of the site. The report has identified a number of on-site sources of contamination which will be managed appropriately at construction stage.
- 3.45 To address potential geo-environmental issues a Phase II investigation is necessary and will be undertaken for detailed design purposes. The study recommends that this should address the following:
- Determine the extent and nature of Made Ground;
  - Characterise the nature of near-surface natural soil beneath the site;
  - Assess soil contamination and include a site-specific assessment of risk to human health;
  - Assess groundwater contamination and include a site-specific assessment of risk to controlled waters;
  - Gas monitoring to establish soil-gas regime at the site;
  - Provide geotechnical design parameters for foundation design purposes.
- 3.46 The documents discussed above were submitted to Shropshire Council with representations to the Regulation 18 Strategic Sites Consultation (2019). They were given due consideration and ultimately informed decisions made by Shropshire Council. Whilst it is acknowledged these assessments may need to be updated to support future masterplanning and/or a Planning Application on the site, they provide a significant level of information regarding the site. **These can be provided to the Inspectors if required.**

### Services & Facilities

- 3.47 Clive Barracks will deliver new employment land opportunities alongside new services, facilities and green infrastructure to serve the proposed development and the existing neighbouring dwellings. The provision of employment land and new services will provide an opportunity for residents of the development to both live and work onsite, helping to reduce reliance on motor vehicles.
- 3.48 The provision of a new local centre, including both small scale retail and potentially a family pub type use will complement the existing Convenience Store, Café and Car Garage that lie on the A41, adjoining the site. The existing services were established to serve the needs of the Barracks and neighbouring residential areas. The proposed development will enhance this established offering, ensuring that both new and existing neighbouring residents have services and facilities to meet their day to day needs within walking distance.

- 3.49 Discussions with the Council have identified that 1 ha of land is required for a new primary school within the site. This is to enable the existing Buntingsdale Primary School (which adjoins the site and currently serves the children of military personnel) to merge with Stoke on Tern Primary School (a nearby rural school). The site will facilitate the delivery of this land and ensure a sustainable future for both of the schools as well as ensuring that the education needs arising from the development are met.
- 3.50 As the Indicative Masterplan indicates, extensive Green Infrastructure will be provided on the site. The location and extent of this has been defined as a result of an understanding of the site's specific constraints and opportunities, gained from the technical evidence.

## 4. Phasing of Development

- 4.1 As evidenced above, detailed consideration has already been given to the necessary infrastructure required to facilitate development at Clive Barracks. The extensive site-specific evidence which has been prepared provides a far deeper review of the site than has been undertaken for many of the other allocations within the emerging Plan.
- 4.2 The evidence prepared for the site provides a significant understanding of necessary timescales for delivery of the infrastructure required to facilitate delivery of the site. Evidence will however be updated at the time of submission of a planning application and specific timescales will be detailed within the Phasing Plan for the site.
- 4.3 The preparation of a comprehensive phasing strategy is to become a requirement of Policy S19, via main modifications to this policy. A comprehensive phasing strategy will be prepared, which will ensure the timely delivery of the site's facilities and infrastructure. The phasing strategy will also cover the timely phasing of affordable housing onsite. Shropshire Council and DIO are committed to ongoing discussions and joint working to achieve an appropriate phasing strategy to ensure that the site delivers as per the housing trajectory.
- 4.4 Moreover, the planning application stage will provide a future opportunity to ensure the phasing strategy relating to the provision of the new infrastructure and services remains appropriate, should any changes in circumstance occur

## 5. Amendments to Policy Wording

5.1 Finally, we note the Inspector's comments about the wording of Policy S19.

5.2 The Council and DIO have worked together to amend the wording, with a view to improving the precision for the benefit of developers and local residents. In line with the Inspector's request, these changes are proposed to be advanced as Main Modifications as documented within the Updated Schedule of Proposed Main Modifications.

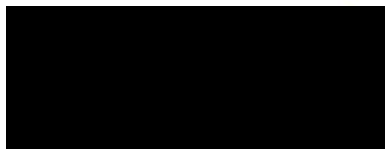
5.3 Both the DIO and the Council are in agreement regarding the proposed policy wording changes.



## 6. Signed Agreement

### AGREEMENT

Signed on behalf of Shropshire Council

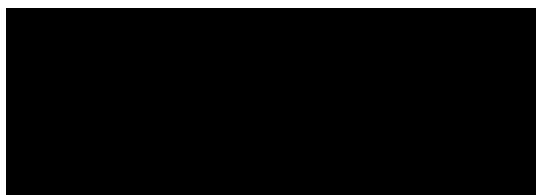


Edward West

Planning Policy and Strategy Manager

Dated: 06 July 2023

Signed on behalf of The Defence Infrastructure Organisation



David Brewer

DIO Chief Operating Officer

Dated: 30 June 2023