

ID40

Shropshire Local Plan Examination

Stage 2 Matters, Issues and Questions

Introduction

Stage 1 hearings, covering the legal and strategic issues, took place in July 2022 and January 2023. Following these hearing sessions we wrote to the Council setting out our findings in relation to the duty to cooperate and other matters to which they responded. The Council have also produced some additional evidence which it has consulted on. This additional evidence and correspondence, including the Council's proposed Main Modifications (GC49) is available on the Council's examination website. Representors may wish to familiarise themselves with this before preparing their hearing statements. [Examination stage documents | Shropshire Council](#)

Stage 2 hearings will commence on 15 October. Initial hearings sessions will deal with matters that remain unresolved following the stage one hearings, as well as matters arising from the Council's updated evidence which was consulted upon in Spring this year.

After a short break of 3 weeks, we will then hold hearing sessions in relation to new matters, including site allocations and development management policies as well as 5 year housing land supply (general housing land need, supply and delivery will be dealt with during the initial hearing sessions). Matters, issues and questions for all of the sessions are set out below.

The Council are in the process of updating their Gypsy and Traveller Accommodation Assessment and this will not be complete until December 2024, at the earliest. Hearing sessions in relation to gypsy and traveller related policies will therefore be dealt with at a separate hearing in 2025.

A draft timetable has been published with all of the stage 2 hearings dates and times. It also sets out what matters will be discussed on which days. This may be subject to change and so representors are advised to check this regularly on the examination website. An updated guidance note has also been published which includes helpful information about taking part in the examination as well as key dates and deadlines you will need to be aware of.

Please note any references to the National Planning Policy Framework (NPPF) are to the July 2021 version (unless otherwise expressed), due to the transitional arrangements set out in Annex 1 of the December 2023 NPPF.

Matter 1 – Legal/Procedural Requirements (policy SP3) – see MM005

Issue

Whether the Council has complied with the relevant procedural and legal requirements.

Questions

Updated Sustainability Appraisal

1. Are the likely environmental, social, and economic effects of the Plan adequately and accurately assessed in the updated Sustainability Appraisal (SA)?
2. Does the updated SA test the Plan against the preferred options chosen and all reasonable alternatives?
3. Have any concerns been raised about the updated SA methodology and what is the Council's response to these?
4. Have the requirements for Strategic Environmental Assessment (SEA) been met?

Habitat Regulations Assessment

5. What is the latest position in relation to nutrient neutrality and are there any outstanding objections from Natural England or the Environment Agency to the Plan proposals? If so, what are these and how is the Council working to overcome them?
6. Is the Local Plan's approach to nutrient neutrality justified, effective and consistent with the National Planning Policy Framework (the Framework) and the requirements of HRA?

Plan Period

7. Is the Local Plan period of 2016 to 2038 consistent with national policy? If not, is there justification for this?

Matter 2 – Development Strategy (policies SP1-10 & SP12-15) – see various MMs

Issue

Whether the Development Strategy is justified, effective and consistent with national policy.

N.B. Detailed issues concerning the individual proposed site allocations will be dealt with under matters 7-24

Questions

1. Do any of the policies in the Plan require updating as a result of changes in national planning policy since the previous hearings in July 2022?
2. Is it proposed that the overall spatial strategy and broad distribution of growth set out in Policy SP2 will remain the same following the additional work? If not, how would it change and are the changes justified, effective and consistent with national policy? Are any consequential changes to Policy SP2 or the supplementary text required?
3. Are the areas identified to meet the Black Country unmet housing needs justified and appropriate?
4. Has meeting some of the housing and employment needs of the Black Country led to the need to release or safeguard more land from the Green Belt? If so, what are the exceptional circumstances for doing this?

Matter 3 – Housing Land Need, Requirement and Supply (policy SP2) – see MMs 001-004

Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall need, requirement and supply of housing land.

Questions

NB. 5 year housing land supply will be dealt with following the consideration of site allocations

The Housing Need

1. In response to previous questions posed by us and discussions at the stage 1 hearing sessions, the Council have provided reasons why they consider the base date of the Plan should remain as 2016 (GC24). We note that the base date of 2016 has been used for the purpose of calculating the requirement for the plan period. Is this correct or should it be when LHN was calculated (2020)? If a base date of 2020 is used how would this affect the housing need, requirement and supply?
2. What is the identified affordable housing need?

The Housing Requirement

1. Is the approach to calculating the housing growth and the housing requirement set out in the Council's Updated Housing and Employment Topic Paper – April 2024 (GC45) of a minimum of 31,300 dwellings over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?
2. What provision is made within the Plan to fulfil the identified unmet housing needs of the Black Country, and will the Plan's approach be effective in addressing this sustainably within the plan period, in accordance with national policy?
3. Has there been significant under delivery of housing? In terms of a buffer for a five year supply of housing sites, should this be 5% or 20% in relation to para 74 of the NPPF?
4. Regarding paragraph 69 of the Framework, would at least 10% of the housing requirement be from sites no larger than a hectare?
5. Is the updated housing requirement in the Plan appropriately aligned with forecasts for jobs growth?
6. What is the requirement for affordable housing and is this likely to meet the identified need?

The Overall Supply of Housing

1. Paragraph 74 of the Framework says strategic policies should include a trajectory illustrating the expected rate of housing delivery over the Plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Does the Council have an up to date trajectory and if so where can this be found? Is the housing trajectory realistic?
2. Is the housing trajectory and information required by the tables appended to our initial questions (ID1) showing the expected rate of delivery of housing land up to date?
3. Should a trajectory illustrating the expected rate of housing delivery over the Plan period be included in the Plan?
4. How will the supply and delivery of housing to meet the identified unmet needs of the Black Country be undertaken? Does this need identifying separately in a trajectory i.e. the expected delivery on the sites (BRD030, SHR060 and IRN001), identified to meet the unmet needs on a yearly basis.
5. Does the Plan identify a developable supply and/or broad locations in years 6-10 and, where possible, years 11-15 necessary to maintain continuity of deliverable supply, including an appropriate buffer for changing circumstances?
6. The Council relies on sites allocated in the SAMDev Plan to meet the overall need as well as to provide a 5 year supply of housing land on adoption of the Plan. What evidence is there to show that these sites will come forward now when they have failed to do so since the SAMDev Plan was adopted in 2015 to cover the period 2006 to 2026.
7. The Council's Housing and Employment Topic Paper (GC45) at Table 10.1 includes SLAA sites as part of the housing land supply. What are these sites and why were they not allocated in the Plan? Are they different to windfall sites?
8. Should windfalls be counted as part of the housing supply for years 1-5 and years 11-15?
9. With regard to paragraph 71 of the Framework, is there compelling evidence that the windfall allowances for large and small sites would represent a reliable source of housing supply? Does the approach to windfall sites avoid double counting?
10. Table 8.5 (page 59) of the Council's Housing and Employment Topic Paper (GC45) contains information described as 'Known Significant Potential Windfall Development Opportunities'. Can they be classed as 'windfalls' if they are already known? Should these sites be allocated in the Plan? How

likely are they to come forward during the Plan period as some have had planning permission in the past which has now lapsed?

11. How is specialist housing factored into supply?
12. What flexibility does the Plan provide if some of the larger sites do not come forward to the Council's estimated timescales?
13. What are the targets for the provision of affordable housing? What has been achieved in recent years?
14. Is the type and size of housing provided/planned meeting/likely to meet the needs of the area?
15. Is there sufficient variety in terms of the location and type of site allocated?

Matter 4 – Employment Land Need, Requirement and Supply (policy SP2) – see MMs 001 -004

Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall need, requirement and supply of employment land.

Questions

Employment Land

1. Is the updated approach to the employment land requirement and supply set out in the Council's Updated Housing and Employment Topic Paper – April 2024 (GC45) of minimum of 320 ha of employment land over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?
2. What provision is made within the Plan to fulfil the identified unmet employment needs of the Black Country, and will the Plan's approach be effective in addressing this sustainably within the plan period, in accordance with national policy?
3. Should the employment land requirement be also expressed in terms of the number of jobs expected to be provided?

Matter 5 – Infrastructure, Delivery and Viability (policies SP1, SP2 & SP14) – see various MMs

Issue

Whether the approach to infrastructure delivery, implementation and monitoring is positively prepared, justified and consistent with national policy.

Questions

Infrastructure

1. In our letter dated 15 February 2023 (ID28), we explained that we had some concerns about the gaps in the IDP and asked that it be updated and some of the gaps populated. Has this now been done?
2. Are there known sources of funding for development expected to be delivered in the first 5-7 years of the Plan? Are these all in the Council's latest Infrastructure Delivery Plan?
3. Will the delivery of strategic infrastructure allow for the delivery of planned development in line with the latest housing trajectory? If not, what will be the shortcomings and how will the Council address these matters?
4. Has the time lapse that has occurred with this examination resulted in any changes in terms of viability? If so, what are they and will they affect the deliverability of any aspects of the Plan?

Matter 6 – Strategic settlements (policy S19) – See MMs 124-125

Issue

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national planning policy in relation to the overall approach to strategic settlements.

Policy S19 – Clive Barracks, Tern Hill

Background

We previously expressed concerns (ID28) 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. This also led 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. We requested further evidence to demonstrate that the appropriate necessary infrastructure would be delivered at the appropriate stages in the delivery of this site to serve its occupants. We also set out some concerns about the vagueness of some of the policy wording in policy S19. The Council's letter GC24 seeks to address these concerns as well as providing an updated SoCG (SoCG 049) with the Defence Infrastructure Organisation and some proposed main modifications to Policy S19.

Questions

1. Is the amended policy justified effective and consistent with national planning policy?
2. Is the housing trajectory for the site realistic and deliverable?
3. Have the infrastructure requirements of the proposed strategic settlement been adequately identified and costed? Including the requirements for:
 - a) road improvements
 - b) air quality mitigation measures
 - c) sustainable transport networks
 - d) the primary school
 - e) healthcare
 - f) green infrastructure
 - g) leisure and sports facilities
 - h) local centre facilities
 - i) contamination remediation.
4. Is there evidence that the infrastructure requirements will be delivered within the necessary timescales?

Place Plan Areas and Site allocations

NB safeguarded land is not included as this is not allocated for development in this Plan.

The following question should be answered by the Council for each Place Plan Area.

1. Is the approach taken to development in the Place Plan Area, justified, effective and consistent with national policy?

The following questions should be answered by the Council for each individual site allocation. In responding to the questions, the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc. In addition, an up-to-date position should be provided in relation to the planning and development status of each site.

Representors do not necessarily need to cover all of these points in their statements.

1. What is the background to the site allocation? How was it identified and which options were considered?
2. What is the scale and type/mix of uses proposed?
3. What is the basis for this and is it justified?
4. What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
5. What are the benefits that the proposed development would bring?
6. What are the potential adverse impacts of developing the site? How could they be mitigated?
7. How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?
8. What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
9. Is the site realistically viable and deliverable?
10. What is the expected timescale and rate of development and is this realistic?
11. Is the boundary of the site appropriate? Is there any justification for amending the boundary?

12. Are the detailed policy requirements effective, justified and consistent with national policy?

Matter 7 - Albrighton Place Plan Area (policy S1) – see MMs 076-079

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

ALB017 & ALB021 – Land north of Kingswood Road and Beamish Lane, Albrighton

Matter 8 - Bishop's Castle Place Plan Area (policy S2) – see MM080

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

BKL008a (northern portion) – Land adjoining Redlake Meadow on B4367, Bucknell

CHR001 – Land between Orchard House and Crofton, Chirbury

CHR002 – Land south of the A490, Chirbury

CLU005 – Land at Turnpike Meadow on B4368, Clun

WBR007 & WBR008 – Land at Bank Farm, Worthen

WBR010 – Land south of the B4386, Worthen

Matter 9 - Bridgnorth Place Plan Area (policy S3) – see MMs 081-083

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

BRD030 – Tasley Garden Village, Bridgnorth

ALV006 & ALV007 – Land north of Daddlebrook Road and west of A442, Alveley

ALV009 – Land adjacent to The Cleckars, Alveley

DNP009 – Land off Derrington Road, adjacent to Brown Clee Primary School, Ditton Priors

Matter 10 – Broseley Place Plan Area (policy S4)

Issue

Whether the proposed Place Plan Area is justified, effective and consistent with national planning policy.

Matter 11 – Church Stretton Place Plan Area (policy S5)

Issue

Whether the proposed Place Plan Area is justified, effective and consistent with national planning policy.

Matter 12 – Cleobury Mortimer Place Plan Area (policy S6)

Issue

Whether the proposed Place Plan Area is justified, effective and consistent with national planning policy.

Matter 13 – Craven Arms Place Plan Area (policy S7) – see MM084

Issue

Whether the proposed Place Plan Area is justified, effective and consistent with national planning policy.

Matter 14 - Ellesmere Place Plan Area (policy S8) – see MM085

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

ELL005 & ELL008 & ELL033 – Land south of Oswestry Road, Ellesmere

Matter 15 - Highley Place Plan Area (policy S9) – see MMs 172 & 173

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

HNN016 – Land south of Oak Street, Highley

Matter 16 - Ludlow Place Plan Area (policy S10) – see MMs 087-091

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

LUD056 – Former Coach Depot and land at Fishmore Road, Ludlow

LUD057 – Former Depot Riddings Road, Ludlow

BUR002 – Land adjoining Lineage Farm on A456, Burford

BUR004 – Land adjoining Boraston Drive on A456, Burford

CHK002 – Land north of The Crescent, Clee Hill

Matter 17 - Market Drayton Place Plan Area (policy S11) – see MMs 092-095

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

MDR006 – Land adjoining Adderley Road, Market Drayton

MDR012 – Land to the east of Maer Lane and north of the A53, Market Drayton

MDR034 – Land west of Maer Lane and north of the A53, Market Drayton

MDR039 & MDR043 – Land at Longford Turning, Market Drayton

HKW009 – Land at School Bank Road, Hinstock

HHH001 & HHH014 – Land adjacent to the Primary school and The Grove, Hodnet

Matter 18 - Minsterley and Pontesbury Place Plan Area (policy S12)

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

MIN018 – Land west of A488, Minsterley

PON008 & PON017 & PON030 – Land at Minsterley Road, Pontesbury

Matter 19 - Much Wenlock Place Plan Area (policy S13)

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

MUW012VAR – Land adjoining the Primary School and Hunters Gate, Much Wenlock

CES005 – Land adjoining The Vicarage on A458, Cressage

CES006 – The Eagles public house on A458, Cressage

Matter 20 - Oswestry Place Plan Area (policy S14) – see MMs 096-104

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 – Land at Park Hall

GWR009 – Land west of Agnes Hunt Memorial Bungalows, Gobowen

KCK009 – Land north of Church Lane, Knockin

LYH007 – Land east of Barley Meadows, Llanymynech

PYC021 – Land east of A483, Pant

RUY019 – Former Dairy Site, School Road, Ruyton XI Towns

SMH031 – Land east of Moors Bank, St Martins

SMH038 – Former Ifton Heath Primary School, St Martins

WEF025 – Land at West Felton

WRP001VAR – Land west of Trehowell Lane, Weston Rhyn

WRP017 – Land off Station Road, Weston Rhyn

WHN024 – Land off Donnett Close, Whittington

Matter 21 - Shifnal Place Plan Area (policy S15) – see MMs 105-109

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

SHF013 – Land adjoining Meadow Drive, Shifnal

SHF015 & SHF029 – Land adjoining Beech House between A464 and Park Lane, Shifnal

SHF022 & SHF023 – Land between Windmill View and The Monument on A464, Shifnal

Matter 22 – Shrewsbury Place Plan Area (policy S16) – see MMs 110-121

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

SHR054a – Land south of Sundorne Road, Shrewsbury

SHR057 & SHR177 – Land north of Mytton Oak Road, Shrewsbury

SHR060, SHR158 & SHR161 – Land between Mytton Oak Road and Hanwood Road, Shrewsbury

SHR145 – Land south of Meole Brace Retail Park, Shrewsbury

SHR173 – Land west of Ellesmere Road, Shrewsbury

BNP024 – Land west of Shrewsbury Road, Baschurch

BNP035 – Land east of Prescott Fields, Baschurch

BAY039 – Land off Lyth Hill Road, Bayston Hill

BAY050 – Former Oaklands School Site, Bayston Hill

BIT022 – Land east of Villa Farm, Bicton

BOM019 – Land west of Shrewsbury Road, Bomere Heath – Phase 1

BOM020 – Land west of Shrewsbury Road, Bomere Heath – Phase 2

FRD011 – Land adjoining But Lane on A458, Ford

Matter 23 - Wem Place Plan Area (policy S17) – see MM122

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

WEM010 – Land off Pyms Road, Wem

WEM025 – Land off Trentham Road, Wem

WEM033 – Land off Whitchurch Road, Wem

CLV012 & CLV018 – Land off Flemlay Park Farm, High Street, Clive and adjacent to the Bungalow

HDL006 – Land south of Wedgefields Close, Hadnall

SHA019 – Land between the A53 and Poynton Road, Shawbury

Matter 24 - Whitchurch Place Plan Area (policy S18) – see MM123

Issue

Whether the proposed Place Plan Area and site allocations within it are justified, effective and consistent with national planning policy.

Sites

WHT014 – Land at Liverpool Road, Whitchurch

WHT037 & WHT044 – Land north of Chester Road, Whitchurch

WHT042 – Land north of Waymills, Whitchurch

PPW025 – Land north of Tudor House, Prees

Matter 25 - Five Year Housing Land Supply

Issue

Whether the Council will have a 5 year supply of deliverable housing land on adoption of the Plan.

NB whilst this Plan is being examined under the July 2021 Framework, the December 2023 Framework will be used for decision making by the Council. Para 76 of the December Framework says “*Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing for decision making purposes if the following criteria are met:*

- a) their adopted plan is less than five years old; and***
- b) that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded.”***

Questions

1. In terms of whether the Council will have a 5 year housing land supply (HLS) on adoption of the Plan, in our letter ID1 we requested that the Council completed the appended forms (Annex 1 to ID1) for every site that the Council intended to rely on to demonstrate their 5 year HLS. The Council responded (GC4) by referring us to various documents. Is this information up to date and if so, where can it be found? If it is not up to date, then can the Council please update it in response to this question.
2. Would the Plan realistically provide for a five year supply on adoption? Will a five year supply be maintained?
3. Is the five year supply made up of deliverable sites (the definition of deliverable is set out in Annex 2: Glossary to the NPPF)?
4. What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by paragraph 70 of the Framework?
5. Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

Matter 26 - All Employment Allocations

Issue

Whether the proposed are justified, effective and consistent with national planning policy.

Questions

Taking each of the following proposed site allocations individually can the Council please respond to questions 1-12 below.

Representors do not necessarily need to cover all of these points in their statements.

P58a – Land north of Stanmore Industrial Estate – see MM082

STC002 – Land adjacent to Hickman Road, Stanmore Industrial Estate – see MM083

BRD030 – Tasley Garden Village, Bridgnorth – see MM081

LUD052 – Land south of The Sheet on A49, Ludlow – see MM089

PKH002, PKH011, PKH013, PKH029, PKH031 & PKH032 – Land at Park Hall – see MM097

SHF018b & SHF018d – Land east of Shifnal Industrial Estate, Upton Lane, Shifnal – see MM109

SHR060, SHR158 & SHR161 – Land between Mytton Oak Road and Hanwood Road, Shrewsbury – see MM113-115

SHR166 – Land to the west of the A49, Shrewsbury – see MM116

1. What is the background to the site allocation? How was it identified and which options were considered?
2. What is the scale and type/mix of uses proposed?
3. What is the basis for this and is it justified?
4. What is the current planning status of the site in terms of planning applications, planning permissions and completions/construction?
5. What are the benefits that the proposed development would bring?
6. What are the potential adverse impacts of developing the site? How could they be mitigated?

7. How is the site affected by flood risk? How has this been taken into account in allocating the site? How have the sequential and, if necessary, exception tests been applied?
8. What are the infrastructure requirements/costs and are there physical or other constraints to development? How would these be addressed?
9. Is the site realistically viable and deliverable?
10. What is the expected timescale and rate of development and is this realistic?
11. Is the boundary of the site appropriate? Is there any justification for amending the boundary?
12. Are the detailed policy requirements effective, justified and consistent with national policy?

N.B. In responding to the questions on site allocations the Council should identify and address specific key concerns raised in representations e.g. in terms of adverse impacts, delivery etc.

Development Management Policies

Matter 27 - General housing policies, including affordable housing (policies DP1, DP1A, DP2, DP3, DP4, DP5, DP6, DP7, DP8)

Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards the provision housing and affordable housing.

Questions

Policy DP1 – Residential mix

NB there are MMs (MMs30-32) proposed to this policy and a new policy (DP1A) is being proposed in relation to the Housing Provision for Older People and those with Disabilities and Special Needs. This will be discussed separately.

1. Is the policy justified, effective and consistent with national planning policy?
2. Is the policy flexible enough?
3. Is there sufficient evidence in relation to the viability of sites with this policy applied?

Proposed new Policy DP1A - Housing Provision for Older People and those with Disabilities and Special Needs (see MMs33-35)

1. Is the policy justified, effective and consistent with national planning policy?
2. Are the policy requirements clear?
3. Is the policy flexible enough?
4. Has the policy been viability tested to ensure it does not prevent development coming forward?

Policy DP2 – Self-Build and Custom-Build Housing

1. Is the policy justified, effective and consistent with national planning policy?
2. Is the timescale for marketing of plots justified?
3. Does the policy or explanation need to be clearer about what a developer needs to do if they have marketed the plots without success before they can sell them as market homes?
4. The policy 'encourages' the provision of serviced plots for self-build and custom build developers. Is the policy worded strongly enough? Should it 'require' rather than 'encourage'?
5. Will the implementation of this policy adversely affect delivery of sites?

Policy DP3 – Affordable Housing Provision

1. Is the policy justified, effective and consistent with national planning policy, including the 2021 Framework (Paragraph 4.53 of the explanation to the policy refers to the 2019 Framework)?
2. Is the requirement set out in DP3 1a appropriate and justified?
3. Should reference be made to 'First Homes' in accordance with PPG?
4. Is DP3 1j necessary?

Policy DP4 – Affordable Housing Exception Schemes (see MM038)

1. Is the policy justified, effective and consistent with national planning policy?
2. Would the policy lead to sustainable development?
3. Could DP4 1k cause some problems as there may be conflict with some other policies in the Plan if the development is beyond settlement limits, for example?

Policy DP5 – Entry Level Exception Sites

1. Is the policy justified, effective and consistent with national planning policy?
2. Would the policy lead to sustainable development?
3. Could DP5 1k cause some problems as there may be conflict with some other policies in the Plan if the development is beyond settlement limits, for example?

Policy DP6 – Single Plot Exception Sites

1. Is the policy justified, effective and consistent with national planning policy?
2. Would the policy lead to sustainable development?
3. Could DP6 1i cause some problems as there may be conflict with some other policies in the Plan if the development is beyond settlement limits, for example?

Policy DP7 – Cross-Subsidy Exception Schemes

1. Is the policy justified, effective and consistent with national planning policy?
2. Would the policy lead to sustainable development?
3. Could DP7 1m cause some problems as there may be conflict with some other policies in the Plan if the development is beyond settlement limits, for example?

Matter 28 - Retail and Leisure policies (policies DP9 & DP10)

Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the approach towards the provision of retail and leisure development.

Questions

DP9 – Managing and Supporting Town Centres (see MM044)

1. Is the policy justified, effective and consistent with national planning policy?

DP10 – Tourism, Culture and Leisure

1. Is the policy justified, effective and consistent with national planning policy?
2. Is the policy too restrictive or should it be more restrictive?

Matter 29 – Climate Change (policy DP11)

Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to climate change.

DP11 – Minimising Carbon Emissions

1. Is the policy justified, effective and consistent with national planning policy?
2. Would implementing this policy affect the viability of sites – is it too onerous on developers?

Matter 30 - Natural and Historic Environment (policies DP12 – DP24)

Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to development in the natural and historic environment.

Questions

DP12 – The Natural Environment

1. Is the policy justified, effective and consistent with national planning policy and in particular the Planning Policy Guidance on Biodiversity net gain (2024)?
2. Has the effect of levels higher than 10% biodiversity net gain been viability tested?

DP13 – Development in the River Clun Catchment (see MMs 045-046)

1. Is the policy justified, effective and consistent with national planning policy?
2. What is the latest position on this matter?
3. Are there any outstanding objections from the Environment Agency or Natural England? If so, what is being done to resolve the outstanding matters?

DP14 – Green Infrastructure (see MMs 047-048)

1. Is the policy justified, effective and consistent with national planning policy?
2. Should Green Infrastructure be mapped for hubs and clusters?
3. Is the policy detailed enough?

DP15 – Open Space and Recreation

1. Is the policy justified, effective and consistent with national planning policy?
2. Is the level of open space required justified and supported by evidence?

DP16 – Landscaping of New Development

1. Is the policy justified, effective and consistent with national planning policy?

DP17 – Landscape and Visual Amenity

1. Is the policy justified, effective and consistent with national planning policy?

DP18 – Pollution and Public Amenity (see MMs 049-050)

1. Is the policy justified, effective and consistent with national planning policy?

DP19 – Water Resources and Water Quality (see MMs 051-052)

1. Is the policy justified, effective and consistent with national planning policy?
2. Are there any outstanding objections from statutory consultees to the policy? If so, what is being to resolve the outstanding issues?

DP20 – Water Efficiency

1. Is the policy justified, effective and consistent with national planning policy?

DP21 – Flood Risk (see MMs 053-054)

1. Is the policy justified, effective and consistent with national planning policy?
2. Are there any outstanding objections from the Environment Agency to this policy? If so, what is being done to resolve the matter?

DP22 – Sustainable Drainage Systems (see MMs 055-056)

1. Is the policy justified, effective and consistent with national planning policy?
2. Are there any outstanding objections from the Environment Agency or drainage authorities to this policy? If so, what is being done to resolve the matter?

DP23 – Conserving and Enhancing the Historic Environment

1. Is the policy justified, effective and consistent with national planning policy?

DP24 – Shropshire Hills Area of Outstanding Natural Beauty (see MM057)

1. Is the policy justified, effective and consistent with national planning policy?

Matter 31 - Transport and Infrastructure (policy DP25, DP26, DP27, DP28)

Issue

Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to transport and infrastructure.

Questions

DP25 – Infrastructure Provision (see MM058)

1. Is the policy justified, effective and consistent with national planning policy?
2. Is the policy detailed enough? Should it make reference to specific infrastructure such as NHS and emergency services infrastructure?

DP26 – Strategic, Renewable and Low Carbon Infrastructure (see MMs 059-060)

1. Is the policy justified, effective and consistent with national planning policy, including the Government's Policy Statement on onshore wind, dated July 8 2024?
2. Are there any outstanding objections from statutory consultees? If so, how are these being resolved?

DP27 – Broadband and Mobile Communications Infrastructure (see MMs 061-062)

1. Is the policy justified, effective and consistent with national planning policy?
2. Is the policy too onerous and if so, how?

DP28 – Communications and Transport (see MMs 063-064)

1. Is the policy justified, effective and consistent with national planning policy?

Matter 32 – Monitoring – see MM259 : Sub:Schedule 3

Issue

Whether the Plan has clear and effective mechanisms for delivery and monitoring

1. Does the monitoring framework in appendix 4 contain relevant and measurable indicators and will it be effective?
2. Will they ensure that the delivery of housing and employment to meet the unmet needs of the Black Country can be effectively monitored.

THE END