

Shropshire Local Plan Examination

Shropshire Council Response to:

**ID40: Stage 2 Matters, Issues and
Questions**

Matter 31



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: Policy DP25 – Infrastructure Provision (see MM058)

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

Shropshire Council Response:

- 1.1. A series of modifications are proposed to the explanation to draft Policy DP25, as detailed in the schedule of proposed main modifications (GC4m).
- 1.2. Shropshire Council considers draft Policy DP25 is justified, effective and consistent with national planning policy.
- 1.3. The intention of this policy is to provide the overarching approach to infrastructure delivery, in order to facilitate development. Specifically:
 - a. It establishes the principle that new development should only occur where there is either sufficient infrastructure capacity already available to support it, or any shortfall in infrastructure can be funded through suitable developer contributions from the development (unless this shortfall is being addressed by other means).
 - b. To ensure the viability of development, it establishes the Council's approach to the prioritisation of Community Infrastructure Levy (CIL) contributions from development:
 - i. Spend will be prioritised towards critical and statutory infrastructure requirements resulting from the development.
 - ii. Funds generated from a development not required to make the development acceptable in planning terms, will be prioritised according to the infrastructure needs of communities identified through infrastructure planning processes.
 - c. It establishes the Council's approach to S106 Planning Obligations for infrastructure provision:
 - i. They will be considered where the CIL associated with a development is not sufficient to meet the specific infrastructure needs of the development.

- ii. Where development is not subject to CIL, they will be used to deliver the infrastructure required to make development acceptable in planning terms.
- 1.4. Shropshire Council considers this policy is important as development can only occur sustainably where there is sufficient infrastructure capacity to support it. Furthermore, appropriate infrastructure provision is an important component of achieving the long-term sustainability of our communities. As such, it makes an important contribution to the achievement of the proposed vision, objectives and spatial strategy for Shropshire and aligns with national priorities.
 - 1.5. The Council considers the requirements of this policy are justified, as they are responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.
 - 1.6. In particular, these requirements are informed by Sustainability Appraisal (SD006.01-SD006.22) (SA); the Shropshire Infrastructure and Investment Plan (GC54) (SIIP); the Shropshire Place Plans (EV067.01-EV067.18); and the Local Plan Development Viability Study (EV115.01) (LPDVS). In particular, the Council would note that:
 - a. The SA (SD006.01) concludes this draft policy will not have any significant negative effects.
 - b. The Place Plans (EV067.01-EV067.18) and SIIP (GC54) identify known infrastructure needs and aspirations in Shropshire. They demonstrate the necessity of securing financial contributions towards infrastructure provision - to ensure that the infrastructure necessary to support development is provided, without which development cannot occur sustainably.
 - c. The LPDVS (EV115.01) appropriately considered and informed the requirements of this draft policy alongside other requirements with potential viability implications in the draft Shropshire Local Plan. Specifically as detailed in Table 10.23, the minimum policy requirements for development include "s106 - £5,000/unit on sites of 50 and larger (including Strategic Sites)" and "CIL at prevailing rate (Stanmore Garden Development and Tasley Gardens Development lie across the CIL Zone boundary so an estimate of the blended CIL Rate is made)". It concludes these requirements are appropriate.
 - 1.7. The explanation to draft Policy DP25 (subject to proposed main modifications in GC4m), provides further justification for the draft policy - including explicit recognition that it is "*fair that the burden of new infrastructure is shared by all development, in proportion to its scale*", but that it is also "*important to ensure that development remains viable in order to ensure delivery.*"

- 1.8. The explanation also assists with the implementation of the policy, including through:
- a. Recognition of the mechanisms available to identify infrastructure requirements - particularly the SIIP (GC54) and Place Plans (EV067.01-EV067.18), which include a particular focus on *"local needs such as highways, flood defences, educational facilities, medical facilities, emergency service facilities, sporting and recreational facilities and open spaces."*
 - b. Providing examples of critical and statutory infrastructure, which includes *"necessary education provision directly resulting from the development, as well as contributions to local and strategic highway improvements and the provision of additional health facilities."*
- 1.9. The draft policy has also been subject to and informed by Regulation 18 (Plan-Making) and Regulation 19 (Pre-Submission) consultations.
- 1.10. The Council considers this policy is effective as it provides clear expectations regarding infrastructure provision. As such it is considered implementable and deliverable over the proposed plan period.
- 1.11. The Council considers this policy is consistent with national policy, particularly paragraph 34 of the 2021 National Planning Policy Framework (NPPF), which states *"Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan."*

Question 2. *Is the policy detailed enough? Should it make reference to specific infrastructure such as NHS and emergency services infrastructure?*

Shropshire Council Response:

- 2.1. Shropshire Council considers that the policy 'strikes the appropriate balance' between detail and brevity.
- 2.2. Specifically, the policy provides the overarching approach to infrastructure provision to facilitate development – including clear expectations for the use of developer contributions to fund infrastructure provision.
- 2.3. As such, it is considered effective and implementable, allowing a shared understanding of expectations amongst developers, communities and decision makers.

- 2.4. The Council recognises the importance of providing necessary NHS and emergency services infrastructure to support development. However, the Council would not support specific reference to these specific categories of infrastructure within the draft Policy.
- 2.5. There are three main reasons for this:
- a. Firstly, if such an approach were taken to NHS and emergency services infrastructure, for consistency it would need to be extended to other infrastructure requirements such as education, highways and utilities. This would result in an unnecessary increase to the size and complexity of the draft Policy.
 - b. Secondly, it would introduce an element of doubt regarding any infrastructure not specifically referenced in the policy – is it or is it not appropriate for such infrastructure to be funded through developer contributions?
 - c. Thirdly, recognising that as technology advances infrastructure needs are likely to evolve over the proposed plan period to 2038, there is a real risk that referencing specific infrastructure requirements in the policy could cause it to become 'out of date' – particularly in combination with the concerns expressed above.
- 2.6. The Council would also note that the explanation to draft Policy DP25 (subject to proposed main modifications in GC4m), provides further explanation to assist with the implementation of the policy, including through:
- a. Recognition of the mechanisms available to identify infrastructure requirements - particularly the SIIP (GC54) and Place Plans (EV067.01-EV067.18), which include a particular focus on *"local needs such as highways, flood defences, educational facilities, medical facilities, emergency service facilities, sporting and recreational facilities and open spaces."*
 - b. Providing examples of critical and statutory infrastructure, which includes *"necessary education provision directly resulting from the development, as well as contributions to local and strategic highway improvements and the provision of additional health facilities."*
- 2.7. As such, there is recognition of the types of infrastructure required to support development within this explanation, removing the need for such reference within the draft policy itself.

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

Question 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?*

Shropshire Council Response:

- 1.1. A series of modifications are proposed to draft Policy DP26, as detailed in the schedule of proposed main modifications (GC4m).
- 1.2. In light of the Government’s Written Ministerial Statement on on-shore wind energy (8th July 2024), which with immediate effect removed the additional planning policy tests applied to proposals for on-shore wind (as previously set out in footnote 54 of paragraph 158 of the 2021 National Planning Policy Framework (NPPF) – the Written Ministerial Statement references footnotes 57 and 58 of paragraph 163 of the current NPPF), it is considered there is need for the Council to update draft Policy DP26 (Strategic, Renewable and Low Carbon Infrastructure) and specifically paragraph 4, which relates to wind energy development.
- 1.3. The Council considers the most appropriate modifications would be to:
 - a. Remove paragraph 4 of this policy entirely.
 - b. Undertake associated modifications to paragraph 2 of this policy to recognise that it applies consistently to all forms of renewable and low-carbon development.
 - c. Undertake associated modifications to the explanation for this policy, specifically amending paragraph 4.236.
- 1.4. These proposed main modifications are illustrated below:

...

~~Non-wind renewable~~ **Renewable** and low carbon development

2. ~~Non-wind renewable~~ **Renewable** and low carbon development will be supported where its impact is, or can be made, acceptable. To aid in this determination, all applications should be accompanied by an assessment of the proposal’s effect on the following during both the construction and operational stages:

...

~~Wind energy development~~

4. ~~In addition to the above criteria for non-wind schemes, proposals for wind energy development of any scale (excluding microgeneration) will only be approved if:~~

- a. ~~The proposed site is in an area identified as suitable for wind energy development in an adopted Neighbourhood Plan; and~~

b. ~~Following consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing.~~

...

4.236. Government's Written Ministerial Statement on on-shore wind energy (8th July 2024), with immediate effect removes additional planning policy tests set out in footnotes 57 and 58 of paragraph 163 of the National Planning Policy Framework. ~~The National Planning Policy Framework (February 2019) states that applications for new wind energy development involving one or more turbines should not be considered acceptable unless they are in an area identified as suitable for wind energy development in the development plan (this can be either the Local Plan or a Neighbourhood Plan). This Local Plan does not identify such areas, but Neighbourhood Plans are encouraged to do so.~~

- 1.5. If agreed these main modifications can be incorporated into an updated schedule of proposed main modifications.
- 1.6. Subject to these proposed main modifications, Shropshire Council considers draft Policy DP26 is justified, effective and consistent with national planning policy.
- 1.7. Draft Policy DP26 establishes the framework for the provision of new strategic infrastructure and the continued operation of existing strategic infrastructure. It applies to all forms of strategic infrastructure, including transport; water management; telecommunications; broadband; and energy generation - including decentralised, low carbon and renewable energy.
- 1.8. It is considered that the draft policy will contribute to the achievement of the vision, objectives and spatial strategy for Shropshire.
- 1.9. The Council considers the requirements of this policy are justified, as they are responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.
- 1.10. In particular these requirements are informed by Sustainability Appraisal (SD006.01-SD006.22) (SA); the Shropshire Corporate Climate Change Strategy Framework (EV019.01); and the Marches LEP Energy Strategy (EV047). The Council would note that:
 - a. The SA (SD006.01) concludes this draft policy will have a significant positive effect on SA Objective 12 (reducing carbon emissions) and no significant negative effects.
 - b. The Corporate Climate Change Strategy Framework (EV019.01); establishes the approach by which Shropshire Council as an organisation will become net carbon zero by 2030. In doing so it

recognises both the leadership role the Council performs and its interactions with our communities, in Chapter 3, where key principles of the strategy are established. This policy directly aligns with and supports achievement of many of these key principles, including:

- i. Supporting clean and inclusive growth in Shropshire – including *"we want the Shropshire economy to shift to one which is zero carbon and abides by circular economy principles, whilst enabling our communities to build and enjoy their prosperity."*
- ii. Influencing the behaviour of others, including *"we have significant influence over emissions indirectly resulting from our policies, and through our regulatory functions."*
- c. The Marches LEP Energy Strategy (EV047) identifies 'aspirations' (section 5.3) which are linked to key priorities in the Strategic Economic Plan for the LEP. These include a commitment to *"increasing uptake of low carbon electricity..."*

1.11. It is also informed by Shropshire Council's declaration of a Climate Emergency in 2019, recognising that climate change represents a major challenge to our way of life and, alongside ensuring that development meets today's needs, comes a responsibility to future generations.

1.12. The Council considers this policy is effective as it provides clear requirements for new strategic infrastructure development and proposals associated with the continued operation of existing strategic infrastructure that require planning permission. As such it is considered implementable and deliverable over the proposed plan period.

1.13. The Council considers this policy is consistent with national policy. It aligns with the expectations of the 2021 National Planning Policy Framework (NPPF), particularly paragraph 155(a), which states: *"To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)..."*

Question 2. *Are there any outstanding objections from statutory consultees? If so, how are these being resolved?*

Shropshire Council Response:

- 2.1. Within their Regulation 19 Representation, the Environment Agency (A0347) raised two issues with draft Policy DP26. In summary these were:
 - a. The Local Authority should ensure that it has fully taken into account the availability of water in new developments, particularly in areas of water stress (Shropshire is moving towards serious water stress).
 - b. There is the need for appropriate foul drainage arrangement, to avoid extensive proliferation of non-mains drainage. Suggest reference to DP19 should be included to make it more effective.
- 2.2. Shropshire Council subsequently proposed two main modifications to the draft Policy (captured within GC4m). Within the SoCG between the two parties (EV022), it was agreed that these modifications addressed the issues raised.
- 2.3. The Council is not aware of other statutory consultees that have raised objection to draft Policy DP26.

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

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

Shropshire Council Response:

- 1.1. Main modifications are proposed to this policy, as detailed in the schedule of proposed main modifications (GC4m).
- 1.2. Shropshire Council considers that subject to these proposed main modifications, draft Policy DP27 is justified, effective and consistent with national policy.
- 1.3. The purpose of this draft Policy is to ensure that new development is supported by deliver high quality digital infrastructure. This alongside provision of other essential utilities infrastructure is key to supporting the sustainable development necessary to achieve the vision, objectives and spatial strategy within the draft Shropshire Local Plan.
- 1.4. Shropshire Council consider the policy is justified as it is responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.

- 1.5. In particular, it aligns with Shropshire's Economic Growth Strategy (EV044), which recognises that digital connectivity is now fundamental for all types and sizes of business. The provision, reliability, coverage and capacity of the digital network and the delivery of its full capacity to business premises is essential to the operation, productivity and growth of the Shropshire economy.
- 1.6. It is also responsive to the Council's understanding of the needs of all groups within our communities informed by such documents as the Broadband Plan for Shropshire (EV125) and the Strategic Housing Market Assessment (EV097.01 and EV097.02) - with activities reliant on digital connectivity becoming ever prominent and important aspects of the lives of communities. These activities range from socialising, to entertainment, to employment.
- 1.7. The policy is responsive to this understanding, seeking to ensure that existing and new communities are supported by high quality digital infrastructure that meets the needs of all residents - supporting how they choose to work and live and enabling them to lower the 'carbon footprint.' In this way, it aligns with the principles of sustainability.
- 1.8. The policy is also justified because it responds to the demographics of Shropshire, informed by the Strategic Housing Market Assessment (EV097.01 and EV097.02), and the principles of the People's Strategy for Shropshire (which includes the Council's strategy for meeting the care and support needs of older people and those with disabilities and special needs). This Strategy is underpinned by the principle of supporting people to remain independent within their own homes and within their existing communities and support networks for as long as possible.
- 1.9. Increasingly important to providing cost-effective domiciliary care, which supports independent living, is assistive technologies - which are rapidly evolving. These technologies are reliant on availability of high quality digital infrastructure. As such, this draft Policy supports the achievement of the People's Strategy, supports the cost-effective provision of care and support to older people and those with disabilities and special needs and aligns with the new draft Policy on Housing Provision for Older People and those with Disabilities and Special Needs (GC25), as set out in the Schedule of Proposed Main Modifications (GC4m).
- 1.10. This policy is also justified by the Council's broader understanding of societal change and Government aspiration, informed by such evidence associated with Project Gigabit (EV125 and EV126.01- EV126.02), and more recent Government references to such issues as the importance of data centres. Specifically, it is apparent that societal change and associated changes to living and working environments underpin the importance of access to high quality

digital connectivity. This draft policy is responsive to this understanding.

- 1.11. The Council would also note that in predominantly rural area, like Shropshire, the reliance on high quality digital connectivity is inevitably greater, as other means of accessing services, facilities and infrastructure are often more challenging than in predominantly urban areas. This is recognised within the Local Transport Plan (EV070.01-EV070.10). Again, the policy is responsive to this understanding.
- 1.12. This policy is also justified by the Sustainability Appraisal (SD006.01-SD006.22) (SA); which concludes that this draft policy will have significant positive effects on SA Objectives 4 and 6 (promoting access to services for all sections of society and reducing the need to travel by car) and no significant negative effects.
- 1.13. Shropshire Council considers the draft policy is effective as it provides clear requirements for the provision of high quality digital connectivity within new development. As such it is considered implementable and deliverable over the proposed plan period and ensures there is appropriate mobile and broadband connectivity available in new developments.
- 1.14. The draft policy is also effective in seeking to ensure that people and businesses can continue to thrive regardless of their location, their mobility or their availability at times when they cannot contact those people, services or businesses who will meet their needs. It will also ensure that more people experience and benefit from technological advances such as the advent and development of Artificial Intelligence (AI) in the lives of people in Shropshire and the UK.
- 1.15. The Council considers this policy is consistent with national policy as it aligns Chapter 10 of the 2021 National Planning Policy Framework (NPPF), which address how Local Planning Authorities should support high quality digital connectivity. Specifically:
 - a. DP27(2) promotes quality broadband provision and mobile network connectivity as essential utilities in the lives of people in Shropshire.
 - b. DP27(1) identifies that Shropshire businesses and communities require quality broadband provision and mobile network connectivity to support economic growth, social inclusion and community safety.
 - c. DP27(3a) requires all residential and commercial developments deliver gigabit-capable broadband infrastructure using 'fibre to the premises' technology or alternative gigabit-capable technologies where justified.

- d. DP27(4) requires all residential and commercial developments to deliver passive ducting wherever possible, to facilitate the delivery of competitive fibre broadband services.
 - e. DP27(5a) expects all residential and commercial developments will be expected to maintain and improve connectivity to mobile voice and data communications networks.
 - f. DP27(5b) that new mobile and fixed wireless network apparatus is appropriately located and sympathetically designed to reduce their visual impacts on the surrounding area.
 - g. DP27(5c) justifies the provision of new installations for mobile and fixed wireless infrastructure on the basis of sound technical evidence.
 - h. DP27(5d) new mobile installations or adaptations demonstrate that they safeguard public health in relation to individual and cumulative effects of all network facilities in that location.
- 1.16. Shropshire Council also recognises the position set out in NPPF paragraph 34, which states *“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.”*
- 1.17. Specifically, draft Policy DP27 recognises the need to balance the delivery of the best available connectivity to high quality communications infrastructure with the feasibility and viability of such provision within new development proposals. For instance, paragraph 3(d) recognises that alternative gigabit-capable technologies to gigabit-capable broadband infrastructure using ‘fibre to the premises’ technology, may be appropriate where justified for reasons including viability, distance from the network or other constraints preventing ‘fibre to the premises’.

Question 2. *Is the policy too onerous and if so, how?*

Shropshire Council Response:

- 2.1. Shropshire Council does not consider draft Policy DP27 to be too onerous. The requirements of this policy are necessary in order to ensure that high quality digital connectivity is achieved within new development.
- 2.2. Such provision is increasingly recognised as fundamental to achieving sustainable development. As such, these requirements are

necessary in order to achieve the vision, objectives and spatial strategy within the draft Shropshire Local Plan.

- 2.3. The Council's response to Question 1 on draft Policy DP27 demonstrates why this policy is justified, effective and consistent with national planning policy.
- 2.4. Importantly, draft Policy DP27 aligns with the expectations of paragraph 34 of the 2021 National Planning Policy Framework (NPPF), which states "*Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.*"
- 2.5. Specifically, draft Policy DP27 recognises the need to balance the delivery of the best available connectivity to high quality communications infrastructure with the feasibility and viability of such provision within new development proposals. For instance, paragraph 3(d) recognises that alternative gigabit-capable technologies to gigabit-capable broadband infrastructure using 'fibre to the premises' technology, may be appropriate where justified for reasons including viability, distance from the network or other constraints preventing 'fibre to the premises'.

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

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

Shropshire Council Response:

- 1.1. Main modifications are proposed to this policy, as detailed in the schedule of proposed main modifications (GC4m).
- 1.2. Shropshire Council considers that subject to these proposed main modifications, draft Policy DP27 is justified, effective and consistent with national policy.
- 1.3. The purpose of this draft policy is to support the improvement of communications and transport networks and associated infrastructure and services, to widen travel and transport choices, and improve connectivity and accessibility.
- 1.4. It promotes and supports improvements to the communications and transport infrastructure serving the County. This is central to the delivery of sustainable economic growth, creation of sustainable

patterns of development and sustainable communities, and supporting reductions to carbon dioxide emissions.

- 1.5. Shropshire Council considers draft Policy DP28 is complementary to and consistent with the wider policies in the draft Shropshire Local Plan and will support the achievement of the vision, objectives and spatial strategy.
- 1.6. In particular, it support the principle of 'urban focus' which underpins the proposed strategy for the distribution of development. Prioritising growth and infrastructure provision in larger settlements, supports the focus of development along 'strategic corridors' and supports the delivery of 'strategic sites' on these 'strategic corridors' through the County.
- 1.7. This process of improving local connectivity and managing changes to our global environment, firstly requires a positive response to our personal communication and travel needs for work and in our lifestyle choices. It will be important to locate new development on transport networks where travel needs are met; to make alternative modes of travel accessible and affordable and provide access to new technologies to remove the need to travel or to change the environmental impacts of our travel behaviour.
- 1.8. Secondly, it requires a positive response towards the delivery of a zero carbon economy. Combined with the solutions offered by investment in travel and transport technologies to bring forward greater consumer choices in sustainable travel and transport services similar to the expanding markets in communications and entertainment services.
- 1.9. Thirdly, it requires a positive response towards reducing dependency on private motor vehicles and fossil fuels through the Hierarchy of Sustainable Transport. This prioritises transport modes focusing first on 'active' travel opportunities by walking, 'wheeling' (using a broad range of mobility devices for those with limited mobility due to age or incapacity) and cycling before using public transport or 'shared' vehicles and in preference to private vehicles.
- 1.10. Shropshire Council consider the policy is justified as it supports the wider spatial strategy and is responsive to and informed by the evidence base prepared to inform the draft Shropshire Local Plan.
- 1.11. In particular, it aligns with and supports the achievement of the Hierarchy of Sustainable Transport (which is detailed within the explanation to the draft Policy). Specifically, it encourages patterns of behaviour that move the UK towards its ambitions of reducing CO2 emissions from travel, reducing traffic congestion, lowering dependency on powered transport and reducing the energy requirements of our transport networks.

- 1.12. It is also informed by the current Local Transport Plan (EV070.01-EV070.10) (LTP) for Shropshire. Crucially, this draft policy will support the achievement of the current and future LTP's for Shropshire and in turn these LTP's will support the achievement of this policy and wider draft Shropshire Local Plan.
- 1.13. Shropshire Council would note that a new Local Transport Plan (LTP Number 4) is currently being prepared, which will align with and support the achievement of the draft Shropshire Local Plan. The objectives of LTP4 will include:
- a. decarbonising transport by achieving modal shifts, adopting low carbon technologies and reducing the need to travel.
 - b. ensuring transport has a positive impact on health and wellbeing, making journeys safe and secure, facilitating active lifestyles and reducing harmful transport emissions.
 - c. providing reliable and sustainable transport networks that are resilient to climate change and minimising negative impacts of transport and development.
 - d. facilitating access to amenities, services and opportunities for residents and businesses through excellent physical and digital connectivity.
 - e. protecting Shropshire's unique natural, built and historic environment and the high-quality assets that Shropshire a great place to live, work and visit.
- 1.14. It is also informed by and will support achievement of the Broadband Plan for Shropshire (EV125) and Project Gigabit (EV125 and EV126.01-EV126.02).
- 1.15. This policy is also justified by the Sustainability Appraisal (SD006.01-SD006.22) (SA); which concludes that this draft policy will have significant positive effects on SA Objectives 4, 5 and 6 (promoting access to services for all sections of society, encouraging use of sustainable means of transport, and reducing the need to travel by car) and no significant negative effects.
- 1.16. The Council considers this policy is effective as it provides clear mechanisms for achieving the objectives of supporting the improvement of communications and transport networks and associated infrastructure and services. In this way it will widen travel and transport choices, and improve connectivity and accessibility. These mechanisms are considered implementable through new development and associated processes.
- 1.17. It also provides clear expectations for highway improvements - they should be justified and effective based on proportionate evidence submitted with any planning applications. The justification should

balance the climate objectives for managing highway schemes against the public benefits on which the scheme is based.

- 1.18. The Council considers this policy is consistent with national policy, particularly Chapters 9 and 10 of the 2021 National Planning Policy Framework (NPPF), which addresses promoting sustainable transport and supporting high quality communications.
- 1.19. With specific regard to consistency with Chapter 9 of the NPPF, paragraphs 3(a) to 3(g) of the draft policy support the Hierarchy of Sustainable Transport (Figure DP28.1) and promote alternatives to, and sustainable methods of, travel.
- 1.20. With specific regard to consistency with Chapter 10 of the NPPF, paragraph 3a recognises the role of digital communications.