



Much Wenlock Town Council

Extraordinary Planning & Environment Committee Meeting

26th April 2022

Supporting Papers

ID8**Shropshire Council. Examination of Shropshire Local Plan 2016-2038**

Inspectors: Louise Crosby MA MRTPI & Carole Dillon BA (Hons) MRTPI

Programme Officer: Julie Ruler

Tel: 01743 254651 Mobile: 07815473338

Email: programme.officer@shropshire.gov.uk

Draft Timetable for the Stage 1 hearing sessions

Commencement date: Tuesday 5 July 2022

Venue: Sovereign Suite, Shrewsbury Town Football Club,
Oteley Road, Shrewsbury, SY2 6ST

For the avoidance of doubt, the hearing sessions will be face to face and begin promptly open at 9.30 each day.

Please note that the timetable is subject to change. Every effort will be made to keep to the days and times given below, but late changes may be unavoidable. Priority will be given to starting the debate on each matter at the appointed time, and it may be necessary to extend the discussion in the afternoon session. The Programme Officer will inform the participants of any late changes to the timetable, but it is the responsibility of the participants to keep themselves up to date with the arrangements and programme.

A list of people attending each session will be provided as a separate document, along with a finalised timetable.

If you have any queries about this timetable or anything else in relation to the examination, please do not hesitate to contact the Programme Officer, Julie Ruler. Her details can be found in the guidance Notes or the examination website <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/>

Week 1**Tuesday 5 July**

All day

1. Opening
2. Matter 1 – Legal Compliance/Procedural Requirements

3. Matter 2 - Duty to Cooperate

Wednesday 6 July

All day

4. Matter 2 – Duty to Cooperate (cont if necessary)
5. Matter 3 – Development Strategy

Thursday 7 July

Morning session

6. Matter 3 – Development Strategy (cont if necessary)
7. Matter 4 Housing and Employment Needs

Afternoon session

8. Matter 4 Housing and Employment Needs (cont)

Week 2

Tuesday 12 July

Morning session

9. Matter 5 – Gypsies, Travellers and Travelling Showpeople
10. Matter 6 - Green Belt and Safeguarded Land

Afternoon session

11. Matter 6 - Green Belt and Safeguarded Land (cont)

Wednesday 13 July

All day

12. Matter 7 - Strategic Settlements

Thursday 14 July

All day

13. Matter 8 - Infrastructure and Delivery, Monitoring and Viability

Friday 15 July

Reserve day

Tuesday, April 19, 2022 at 4:00:44 PM British Summer Time

Subject: Apologies if received this already
Date: Tuesday, 12 April 2022 at 12:13:02 British Summer Time
From: Programme Officer
Attachments: ID8 Draft Stage 1 hearings timetable (3).pdf, ID6 Stage 1 guidance notes (3).pdf, ID7 Matters and Issues - Stage 1 (1).pdf, SLP Stage 1 hearing statement title page.docx

Dear Sir/Madam,

Examination of Shropshire Local Plan (Stage 1)

Please find attached the Inspectors' matters, issues and questions (MIQs) in relation to Stage 1 of the examination of the Shropshire Local Plan. A guidance note on the procedural and administrative arrangements to assist you in participating in this examination process is also provided.

The attached guidance note includes details of important deadlines including those for submitting statements in response to the Inspectors' Stage 1 MIQs and where relevant any Statements of Common Ground. It also sets the deadline for you to register your intention to participate in particular hearing sessions if you so wish. The guidance note sets out how to prepare and submit statements in response to the MIQs. I also enclose a provisional timetable for the hearings sessions for this first stage of the examination. Please note that this could be subject to change and a final timetable will be circulated shortly before the opening session.

It is important that you take time to read these documents carefully and familiarise yourself with the important deadlines set by the Inspectors, as well as the hearing session venue and timetable.

It is also important that you fully complete and attach a copy of the hearing statement title page template (copy attached) to each hearing statement that you submit. Details of how to locate your unique Representor Part A Reference Code is contained in the guidance note provided.

Please ensure that you keep me informed of any changes to your contact details or preferred method of communication during the course of this examination so that I can update my records accordingly. If you have not done so already, I would be obliged if an email address could be provided wherever possible. This is so that I may contact you at short notice, if necessary, and also provide you with examination documents at the earliest possible time.

I have provided my contact details in case you have any queries in respect to any matters relating to this examination or have difficulties in locating your unique Representor Part A Reference Code.

A copy of this letter and the associated attachments has been placed in the examination library which is hosted on the Council's website at <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/examination-stage-documents/>

Yours sincerely,

Julie Ruler

Julie M Ruler
Programme Officer

Shropshire Local Plan
Direct Line: 01743-254681
Mobile: 07815473338
Email: programme.officer@shropshire.gov.uk
Please Note Working 25 hours per week

Please look at the examination stage documents

<https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/examination-stage-documents/>

Websites: <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review>
<https://www.gov.uk/government/publications/examining-local-plans-procedural-practice/procedure-guide-for-local-plan-examinations>

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Shropshire Council, Shirehall, Abbey Foregate, Shrewsbury, SY2 6ND. You can contact our Data Protection Officer on: 01743 252774 or by email at:
information.request@shropshire.gov.uk

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ID6

Shropshire Council

Examination of Shropshire Local Plan 2016-2038

Inspectors: Louise Crosby MA MRTPI and Carole Dillon BA(Hons) MRTPI

Programme Officer: Julie Ruler

Tel: 01743 254651 Mobile: 07815473338

Email: programme.officer@shropshire.gov.uk

Address: Planning Policy, Shropshire Council, PO BOX 293, Oswestry, SY11 3QG

Examination webpage: <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/>

GUIDANCE NOTE FROM THE INSPECTORS

Purpose

1. The Shropshire Local Plan 2016-2038 was submitted for examination on 3 September 2021. We have been appointed by the Secretary of State to conduct the examination. This note provides guidance on the procedural and administrative arrangements for the examination.
2. Further information on the examination process can be found in the Planning Inspectorate's publication 'Procedure Guide for Local Plan Examinations' which is available via <https://www.gov.uk/guidance/local-plans>. There is also a [short guide](#) aimed particularly at those taking part in an examination for the first time.

Programme Officer

3. Julie Ruler is the Programme Officer (PO) for the examination. She is working under our direction and is independent of the Council. Her contact details are given above.
4. The main tasks of the PO are to act as the channel of communication between the Inspectors, the Council and all the other participants, to liaise with all parties to ensure the smooth running of the examination, to organise the hearing programme, and to oversee the publication of documents on the examination webpage.
5. Any procedural questions or other matters that you wish to raise should be directed to the PO.

Examination webpage

6. The examination webpage is hosted on the Council's website, but its content is controlled by the Inspectors and the PO. All documents for the examination, including the evidence base and the procedural material, are published on the examination webpage – the link is provided above.
7. If you do not have access to the internet, please contact the PO so that alternative arrangements can be put in place.

Inspector's role

8. Our task is to consider whether the submitted Plan ("the Plan") complies with the relevant legislation and is sound. The National Planning Policy Framework (NPPF) (paragraph 35) makes it clear that in order to be found sound the Plan must be:
 - a) positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - b) justified – an appropriate strategy taking into account the reasonable alternatives, and based on proportionate evidence;
 - c) effective – deliverable over the plan period and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d) consistent with national policy – enabling the delivery of sustainable development in accordance with the NPPF's policies and other statements of national policy, where relevant.
9. It is not part of our role to make improvements to the Plan, provided that it is sound and legally compliant.

The examination

10. There are three possible outcomes to the examination:
 - the submitted plan is sound and legally compliant;
 - the submitted plan is not sound and/or legally compliant but could be made so by changes (known as main modifications), if necessary following the preparation of additional evidence; or
 - the submitted plan is not sound and could not be made sound by changes. If so, I would be likely to recommend that the Council withdraws the plan. The same would apply if there is a failure of legal compliance which cannot be remedied (for example, a failure to comply with the duty to cooperate).

11. After all of the hearings have closed, we will prepare a report for the Council setting out our conclusions and recommendations. Our report will deal with the main issues of soundness and legal compliance, taking into account the representations made but without responding to each of them.
12. The basis for our examination will be the Shropshire Local Plan 2016-2038 on which consultation took place from 18 December 2020 for 10 weeks.

Changes to the plan

13. The starting point for the examination is that the Council has submitted a plan which they think is ready for examination.¹ Now that the Plan has been submitted there are only two means by which changes can be made to it:
 - a) as main modifications recommended by the Inspector; or
 - b) as additional modifications made by the Council.
14. We can only recommend main modifications if they are necessary to make the submitted Plan sound and/or legally compliant. Any potential main modifications must be subject to consultation before we recommend them, and in some cases, they may also require further sustainability appraisal.
15. Additional modifications (sometimes also referred to as “minor modifications”) are changes which do not materially affect the policies in the Plan. They may be made by the Council on adoption and do not fall within the scope of the examination. The Council is accountable for any additional modifications that are made.
16. The Council has suggested a series of changes to the Plan as Schedule of main modifications [GC4m]. This is a ‘living’ document that may be amended by the Council throughout the examination. We will consider those changes and they may be discussed in the hearing sessions and we will refer to the track-changed version in the hearing, but it is important to recognise that the basis for our examination is the submitted Plan, not including the suggested changes. We will only recommend changes to the submitted Plan that amount to main modifications if they are required to ensure the soundness and/or legal compliance of the submitted Plan.

Representations made on the Plan

17. The Council has prepared a Consultation Statement [SD004] which includes details of the consultation that has taken place on the Plan, and a summary of the main issues raised in the representations. The Council has also prepared a response to the representations made [GC4o].
18. A full set of the representations made on the Plan at the pre-submission (Regulation 19) stage has been provided to us and we will take them all into account. The legislation does not require us to take account of any representations made at any earlier stage, including under Regulation 18.

¹ S20(2) of the Planning and Compulsory Purchase Act 2004

Examination hearing

19. The examination will take place in at least 2 stages. The initial stage will consider the matters set out in our matters, issues and questions document [ID7] which is being issued at the same time as this guidance note. Later hearings sessions will consider the outstanding matters and any matters not resolved at stage 1. The dates for these will not be published until after the conclusion of the stage 1 hearings.
20. The examination hearings, which form part of the examination of the Plan, will commence at 9.30am on 5 July 2022. The hearings will take place in the **Sovereign Suite, Shrewsbury Town Football Club, Oteley Road, Shrewsbury SY2 6ST**. The draft programme for the hearings [ID8] is being issued at the same time as this guidance note.
21. Discussion at the hearings will be based on our matters, issues and questions. More focussed agendas providing further guidance for the discussion will also be published in advance of one or more of the hearing sessions.

Attending the hearing

22. Anyone may attend the hearing as an observer, but only those who have made representation(s) seeking to change the Plan have a right to appear before, and be heard by, the Inspectors.
23. Written representations carry the same weight as those made orally at a hearing session. Participation at the hearing is therefore only likely to be beneficial if you have specific points to contribute on the published matters, issues and questions. Normally you may only take part in the hearing session(s) that are relevant to your original representation(s).
24. If you have a right to be heard and you wish to exercise that right, you should contact the PO by **2 May 2022** indicating which session(s) in the published hearing programme you wish to participate in. You must do this regardless of what you may have indicated in your original representation(s). Please note that if you do not contact the PO by that date, it will be assumed that you do not wish to appear and be heard and you will not be listed as a participant.
25. Representors who are not seeking changes to the Plan, including those who have made representations supporting it, do not have a right to take part in the hearing. However, we may invite additional participants to take part in the hearing if their participation would assist us in determining the soundness and legal compliance of the Plan.
26. To ensure that there is sufficient space, organisations participating in the hearing sessions will normally be allocated one seat at the table, with members of their team “hot-seating” as necessary. Similarly, the Council should limit the number of its representatives at the table to those needed to deal with the topic under discussion.

27. Where several representors or organisations who have similar points to make wish to attend the hearing, it would assist us if they would arrange to be represented by one or two spokesperson(s).
28. Please let the Programme Officer know as soon as possible if you have any specific needs or requirements to enable your attendance at and/or participation in the hearing session(s).

Hearing statements

29. Please be aware that the Council have submitted further information and evidence since it submitted the Plan for examination. This and letters from the Inspectors can be found on the examination website by following this link: <https://shropshire.gov.uk/planning-policy/local-planning/local-plan-review/draft-shropshire-local-plan-2016-2038-examination/examination-library/examination-stage-documents/>
30. The Council should produce a statement for each hearing session responding to all the identified matters, issues and questions.
31. Other participants in the hearing sessions should only submit hearing statements if they have points to make on the identified matters, issues and questions that were not covered in their original representations.

Separate statements should be submitted for each hearing session and be concise and focussed, and in any event must contain no more than 3,000 words for each matter. The title page template provided must be completed and attached to each statement. To assist in this, your unique identification reference can be found in the Schedule of Respondents (Schedule 3 of document SD014.01) at:

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

32. Statements should:
 - clearly identify which specific matters, issues and questions are being answered;
 - only answer the specific matters, issues and questions which are of direct relevance to your original representation(s);
 - not introduce new evidence or arguments.
33. Appendices should only be included if they are directly relevant and necessary and should not be used as a means of increasing the word-count. If you need to refer to a large document that is not on the examination webpage, please contact the PO as it may be more efficient for it to be added to the webpage rather than attached to a statement.

34. The Council's statements should also be focussed and succinct. However, because the Council has to answer every issue and question, it may be necessary to go over the limit of 3,000 words per matter.
35. Please email electronic versions of your statement(s) and any appendices to the PO in Word or PDF format by **1 June 2022**. If you are unable to email your statement, please contact the PO so that alternative arrangements can be made. In addition, you should send two paper copies of your statement(s) and of any appendices to arrive by **3 June 2022**.
36. Hearing statements will be posted on the examination webpage after the submission date, so that they are available to all participants and anyone else who wishes to read them. Because they will be available in this way, they will not be circulated directly to participants. Anyone who is unable to access them on the webpage should contact the PO.
37. Once the date for submitting hearing statements has passed, no other written evidence will be accepted, unless we specifically request it. In fairness to other participants, the hearing sessions should not be used to introduce additional evidence.

Statements of Common Ground

38. In the context of the duty to co-operate, the NPPF (paragraph 27) expects one or more statement(s) of common ground (SoCG) to be produced documenting the cross-boundary matters being addressed and progress in co-operating to address them.
39. It is often also useful for SoCGs to be drawn up between the Councils and other public bodies, other participants or site promoters to confirm specific matters that have been agreed, particularly if those matters have previously been the subject of representations raising soundness or legal compliance issues. SoCGs can also helpfully highlight matters that remain in contention, or the position regarding individual allocated sites.
40. If any SoCGs are to be prepared then they should, wherever possible, be completed by **13 May 2022** and published as examination documents so that other representors are aware of their contents before submitting their hearing statements. This should not preclude the Council from continuing to engage on outstanding issues with other bodies and updating any SoCGs as necessary.

Conduct of the hearing sessions

41. The hearing sessions will be based on the identified matters, issues and questions as further clarified and refined by the agenda issued before the hearing sessions. Each hearing session will deal with these by way of a structured discussion which we will lead, taking an inquisitorial approach. There will be no formal presentation of cases or cross-examination. Participants may, if they wish, bring professional experts with them, although this is not essential.

42. Discussion at the hearing sessions will focus on the issues that we need to hear further discussion about, in order to reach conclusions on the soundness and legal compliance of the Plan, and on any potential need for main modifications. We will make a few brief introductory comments on the issues to be covered and then invite individuals to respond to specific questions. We will have read all the relevant representations and statements beforehand and will expect other participants to have done so as well. The hearing sessions are not an opportunity to repeat a case already set out in written representations.

Hearing programme

43. Updates to the hearing programme, if required, will be available on the Council's webpage. It is the responsibility of individual participants to check the latest timetable and to ensure that they are present at the correct time.
44. The hearing sessions will normally start at 9.30am and 1.30pm each day. Short breaks will normally be taken at convenient points and a lunch break will take place between 12.30pm and 1.30pm.

Omission sites

45. Some representations are concerned with what are known as "omission sites". These are sites which have not been allocated in the Plan for development. However, our role is to examine the soundness of the submitted Plan. It is not part of our role to examine the soundness of sites that are not allocated in the Plan. Consequently, we do not propose to hold a hearing session dealing specifically with sites that have not been allocated in the Plan, or to discuss the merits of omission sites at other sessions.
46. Should it be the case that additional sites need to be included in the Plan (for example, because an allocated site is found to be unsound), we will look to the Council to decide which alternative or additional sites should be brought forward for examination.

Site visits

47. We will carry out site visits before, during, or after the hearing as necessary to inform our assessment of the soundness of the Plan. All site visits will be unaccompanied, unless it is necessary to go onto private land, in which case we will make the necessary arrangements via the PO.

Close of the examination

48. The examination will close when our report is submitted to the Council. However, unless we specifically request them, no further representations or evidence will be accepted after the hearing sessions have finished. Late or unsolicited material may be returned.

Summary of the examination programme

2 May 2022 - Deadline to confirm with the PO whether you wish to exercise your right to appear at an examination hearing session

13 May 2022 - Deadline for submission of statements of common ground

1 June 2022 - Deadline for submission of hearing statements and any appendices by e-mail

3 June 2020 – Deadline for receipt of paper copies of statements (in addition to e-mailed statements)

5 July 2022 - Hearing sessions begin

Further information

49. Further information about the preparation and examination of Local Plans is available as follows:

Relevant guidance – available from <https://www.gov.uk/guidance/local-plans>

Procedure Guide for Local Plan Examinations
 Short guide to taking part in local plan examinations
 National Planning Policy Framework
 Planning Practice Guidance, including the section on Plan-making

Relevant legislation – available at <http://www.legislation.gov.uk/>

Planning and Compulsory Purchase Act 2004 (as amended)
 The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended)

Louise Crosby and Carole Dillon

INSPECTORS

7 April 2022

Examination into Shropshire Local Plan

ID7**Shropshire Local Plan Examination****Stage 1 Matters, Issues and Questions****Introduction**

The examination will take place in two stages.

Stage 1 will cover the legal and strategic issues set out below.

If after the Stage 1 hearing sessions, we consider that in relation to these issues the Local Plan is likely to be capable of being found legally compliant and sound (having regard to the potential for us to recommend modifications), Stage 2 will then commence.

Stage 2 will consider the minerals and waste policies, development management policies and the site allocations. A further set of matters, issues and questions will be issued for the stage 2 hearings in due course.

Matter 1 – Legal/Procedural Requirements (policy SP3)**Issue**

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

QuestionsPlan preparation

1. Is the Local Plan compliant with:
 - (a) the Local Development Scheme?
 - (b) the Statement of Community Involvement?
 - (c) the 2004 Act and the 2012 Regulations?

Sustainability Appraisal

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

Examination into Shropshire Local Plan

5. Have the requirements for Strategic Environmental Assessment (SEA) been met?

Habitat Regulations Assessment

6. Are the likely environmental, social and economic effects of the Local Plan adequately and accurately assessed in the Habitats Regulations Assessments (HRA)?
7. Is the Local Plan's approach to water nutrient neutrality justified, effective and consistent with the National Planning Policy Framework (the Framework) and the requirements of HRA?
8. What are the conclusions of the River Clun SAC Mitigation Measures Study? Which proposed site allocations are affected? Is the mitigation possible and how will it affect delivery of the affected sites? Will it impact on viability?
9. Is it appropriate to deal with mitigation measures through a Supplementary Planning Document (SPD)? Should it be resolved before the Local Plan is adopted?
10. 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?
11. The proposal for the North-West Relief Road (NWRR) is not a specific allocation in the Local Plan and is subject to separate HRA process. What is the latest position on the planning application for this project? Does the Local Plan rely upon the NWRR to deliver sites allocated in it?

Equalities

12. Is there any substantive evidence to show that the Local Plan would have significant effects on equalities and, particularly groups with protected characteristics that have not been found in the Council's assessment?
13. Does the supporting Equalities and Social Inclusion Assessment identify all relevant groups with protected characteristics?
14. Does the submitted evidence show that the Local Plan would not have significant effects on equalities in respect of all groups?

Examination into Shropshire Local Plan

Climate change

15. How does Policy SP3 along with the overarching strategy of the Local Plan secure the development and use of land which contributes to the mitigation of, and adaptation to, climate change consistent with S19 (1A) of the Planning and Compulsory Purchase Act 2004 and paragraphs 152 – 158 of the Framework?

Neighbourhood plans

16. Does the Local Plan set an appropriate framework, and allow a suitable role, for existing and future neighbourhood plans in the plan area?

Plan period

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

Examination into Shropshire Local Plan

Matter 2 – The duty to co-operate**Issue**

Whether the Council has complied with the duty to cooperate in the preparation of the Local Plan.

QuestionsGeneral

1. What are the genuinely strategic matters for the Local Plan as defined by S33A (4) of the Planning and Compulsory Purchase Act?

Overall housing provision

2. Who has the Council engaged with in terms of overall housing provision and what form has this taken?
3. What are the relevant inter-relationships with other neighbouring authorities in terms of migration, commuting and housing markets?
4. How have these inter-relationships been considered in preparing the Local Plan in terms of identifying the Local Housing Need (LHN) and setting the Local Plan's Housing Requirement?
5. What is the justification for the allocation of 1500 homes to meet some of the unmet housing need from the Black Country?
6. Are there any other issues of unmet housing needs within the Housing Market Area (HMA) or relating to other authorities? If so, how are these being addressed?
7. Are the Statements of Common Ground (SoCG) with neighbouring authorities and stakeholders still relevant and up to date?
8. What is the position of other authorities in the HMA and elsewhere in terms of the planned level of housing in Shropshire? Have specific concerns been raised through duty to co-operate discussions or representations which still are unresolved?
9. In overall terms, has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue of housing provision?

Examination into Shropshire Local Plan

Jobs growth and employment land provision

10. Who has the Council engaged with in terms of jobs growth and employment land provision and what form has this taken?
11. What are the relevant inter-relationships with other authorities in terms of economic activity, travel to work and the market for employment land and premises?
12. How have these inter-relationships been considered in preparing the Local Plan in terms of jobs growth and employment land provision?
13. What is the justification for the allocation of 30ha of employment land to meet some of the unmet need from the Black Country?
14. In overall terms, has the Council engaged constructively, actively and on an ongoing basis in maximising the effectiveness of the preparation of the Local Plan? What has been the outcome of co-operation and how has this addressed the issue of jobs growth and employment land provision?

Transport infrastructure

15. What are the strategic matters and particular issues relevant to the Local Plan?
16. Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
19. In overall terms, has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

Water resources/wastewater

20. What are the strategic matters and particular issues relevant to the Local Plan?
21. Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
22. In overall terms, has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

Examination into Shropshire Local Plan

Flood risk

23. What are the strategic matters and particular issues relevant to the Local Plan?
24. Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
25. In overall terms, has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

Minerals and waste

26. What are the strategic matters and particular issues relevant to the Local Plan?
27. Who has the Council engaged with? When did this engagement begin, has it been active and ongoing and what form has it taken?
28. In overall terms, has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

Site allocations

29. Are there any cross-boundary issues such as transport, education, health or other infrastructure requirements that arise from the proposed housing and employment site allocations? If so, how have they been addressed through co-operation.

Other strategic matters

30. Are there any other strategic matters and particular issues relevant to the Local Plan?
31. Who has the Council engaged with on any other strategic matters? When did this engagement begin, has it been active and ongoing and what form has it taken?
32. In overall terms, has the Council engaged constructively? What has been the outcome of co-operation and how has this addressed the issue?

Examination into Shropshire Local Plan

Matter 3 – Development Strategy (Policies SP1 – SP15)**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 at the stage 2 hearings.

Questions

1. How do the strategic policies in the Local Plan accord with paragraphs 20-23 of the Framework?
2. Does Policy SP1 include criteria to assess development proposals against? Does it replicate other policies in the Local Plan? Is it necessary and effective?
3. What is the basis for the overall spatial strategy and broad distribution of growth set out in Policy SP2? What options were considered and why was this chosen?
4. Should Policy SP2 define the scale of development expected in the various urban locations and rural settlements?
5. The spatial strategy in the Core Strategy has a rural focus, while the submitted Local Plan's spatial strategy is urban focussed. The latter holds a list of 'saved sites' in appendix 2 which the Council intends to rely upon to meet the new spatial strategy and development requirements. Do the 'saved sites' accord with the spatial distribution of the submitted Local Plan? What will be the policy basis for these 'saved sites'? By relying upon such an approach, is the Local Plan positively prepared, justified, effective and consistent with national policy?
6. Is it appropriate to show 'saved sites' on the proposals map given they are not site allocations in the submitted Local Plan, bearing in mind regulation 9 of The Town and Country Planning (Local Planning) (England) Regulations 2012?
7. What proportion of housing supply comes from the 'saved sites'?
8. What proportion of the 'saved sites' have an extant planning permission and what is their level of contribution to the housing supply?
9. Is Policy SP3 justified, effective and consistent with national planning policy and Planning Practice Guidance (PPG)?

Examination into Shropshire Local Plan

10. Is Policy SP4 necessary as it rehearses national planning policy, contrary to the advice in PPG (Paragraph: 036 Reference ID: 61-036-20190723)?
11. The Framework at paragraph 28 advises that *'non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods, or types of development. This can include...the provision of infrastructure and community facilities at a local level...establishing design principles...'* Are Policies SP5 and SP6 strategic policies or development management policies?
12. What is the status of the West Midlands Design Charter and does Policy SP5 align with its principles? Is there any scope for tension between Policy SP5 and Policy DP24? Is Policy SP5 justified, effective and consistent with national policy?
13. How have the health impacts of the Local Plan been assessed and addressed? Is Policy SP6 justified, effective and consistent with national policy?
14. Is Policy SP7 positively prepared, justified, effective and consistent with national policy? How have the residential guidelines been derived? Do these policies duplicate parts of other policies?
15. Is the Community Hub and Community Cluster approach to development set out in Policies SP8 and SP9 justified and effective and consistent with national planning policy? Do these policies duplicate parts of other policies?
16. Is the approach to development in the countryside, set out in Policy SP10, justified and effective and consistent with national planning policy? Should it be more flexible and less restrictive? Is the policy overly long and complicated and does some of it duplicate other policies? Would this policy be more effective as several shorter, targeted development management policies?
17. Is Policy SP12 justified effective and consistent with national policy?
18. Is Policy SP13 justified effective and consistent with national policy? Should figure SP13.1 text be included within Policy SP13?
19. Is Policy SP14 justified effective and consistent with national policy? Should the corridors be marked on a map or plan? Is this policy consistent with other policies in the Local Plan? Is it the purpose of this policy to allow for significant growth in addition to

Examination into Shropshire Local Plan

that allocated in the Local Plan, including development in the Green Belt?

20. What is the national planning policy basis for Whole Estate Plans (Policy SP15)? What will be the process for endorsement and what will be their purpose? Should SP15 be a non-strategic policy?
21. Does the Local Plan strategy rely on windfall development and is the windfall allowance based on paragraph 71 of the Framework? Does the windfall allowance for housing need to be set out in the Local Plan?
22. Does the Local Plan allocate 10% of the housing requirement on sites no larger than one hectare as set out in paragraph 69 of the Framework or is the Council relying on windfalls and commitments?
23. Should the Local Plan include more small and medium size sites to provide greater choice, flexibility, and certainty?
24. How have the settlement boundaries been decided and were they reviewed when preparing this Local Plan?

Examination into Shropshire Local Plan

Matter 4 – Housing and Employment Land Needs (policy SP2)**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 provision for housing and employment land.

QuestionsHousing

1. Is the preferred approach to housing growth and the housing requirement set out in Policy SP2 of 30,800 dwellings (1,400 dwellings per annum) over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?
2. Is the housing requirement in the Local Plan appropriately aligned with forecasts for jobs growth?
3. What provision is made within the Local Plan to fulfil the identified unmet housing needs of the Black Country, and will the Local Plan's approach be effective in addressing this sustainably within the plan period, in accordance with national policy?
4. The soundness of proposals for the land allocations in the Local Plan will be considered at Stage 2 of the Examination. However, given that many 'saved' sites which are not before us are included in the housing land supply, is it realistic that this examination can determine if the Council have a 5-year supply of deliverable housing land?
5. The Council in response to our initial questions said that they wish to 'fix' their 5-year housing land supply and have included 10% buffer. Assuming it is agreed that we can determine if the Council have a 5-year supply of deliverable housing land, PPG at Paragraph: 010 Reference ID: 68-010-20190722 says that "*When confirming their supply through this process, local planning authorities will need to be clear that they are seeking to confirm the existence of a 5 year supply as part of the plan-making process, and engage with developers and others with an interest in housing delivery (as set out in [Paragraph 74a of the Framework](#)), at draft plan publication (Regulation 19) stage.*" Can the Council please confirm if they did this and if so, provide evidence of it?
6. Should the Local Plan include a housing trajectory showing the expected rate of delivery of housing land?

Examination into Shropshire Local Plan

Employment Land

7. Is the preferred “balanced growth” approach and the resulting employment land requirement set out in Policy SP2 of around 300 hectares (14ha per annum) over the plan period of 2016 to 2038, justified, positively prepared and consistent with national policy?
8. What provision is made within the Local Plan to fulfil the identified unmet employment needs of the Black Country, and will the Local Plan’s approach be effective in addressing this sustainably within the plan period, in accordance with national policy?
9. Should the employment land requirement be also expressed in terms of the number of jobs expected to be provided?

Examination into Shropshire Local Plan

Matter 5 - Gypsies, Travellers and Travelling Showpeople (policy SP10)**Issue**

Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to the provision of accommodation for Gypsies and Travellers.

N.B. Detailed issues concerning Policy DP8 will be dealt with at the stage 2 hearings.

Questions

1. The Shropshire Gypsy and Traveller and Travelling Showpeople Assessment (GTAA) was published in 2017 and then subject to a 'focussed review' and later update in 2019. The Council has confirmed in their response to our initial questions that the 2019 update did not involve a re-survey of the Gypsy and Traveller community. We have been informed that the 2019 update relied on the knowledge of the Council's Gypsy liaison team, other professionals, planning approvals and unauthorised encampments. Is the approach to meeting the needs of the Gypsy and Traveller and Travelling Show People community in the Shropshire, justified, effective and consistent with the Planning Policy for Traveller Sites (PPTS)?

In particular:

- a. Table 7.4 of the GTAA (2019) sets out the past turnover rate of pitches/plots on public sites. The Council has relied on turnover as a way of meeting the accommodation needs of Gypsies and Travellers for quite a few years. Has this approach met these needs and if so, can the Council please provide evidence to show this?
- b. Should turnover data continue to be relied upon solely to calculate the future requirements of the area's GRT community? What certainty is there that turnover will continue at that rate? Is turnover on public pitches necessarily a sign of new pitches becoming genuinely available to meet the needs of the 43 families shown in the GTAA (2019) who meet the PPTS definition of Gypsy and Traveller?

Examination into Shropshire Local Plan

- c. Do the turnover assumptions relied upon to meet future needs include all vacant plots/pitches, bearing in mind some may be vacant for a particular reason or are not genuinely available because of cultural or family matters?
 - d. How have the Council taken account of changes in particular family circumstances such as household formation, or those of new families? Will the overall supply of pitches grow to meet the increased needs of the Gypsy and Traveller community in Shropshire that will arise from new household formation as well as potentially new families moving into the area?
 - e. We note that the 2017 GTAA recorded 83 Gypsy and Traveller families living in bricks and mortar housing (data taken from 2011 census). How does the GTAA (2019) take account of changing preferences of those settled Travellers who make up most of the area's GRT community? Does the evidence provide a robust assessment that vacancies will arise and be available for those not currently on a pitch? Have their needs been considered in the 2019 update?
 - f. What measures have been employed to avoid double-counting due to circumstances other than movement within the Local Plan area, for example where there has been a change in head of household?
 - g. How has the Council ensured that concealed households and other forms of overcrowding have been considered in their assessment of future needs?
2. What evidence exists about the future requirements of other caravan and boat dwellers and how does the Local Plan address any identified needs?
 3. What changes have occurred to the baseline position since the GTAA (2019) was undertaken about households permanently occupying caravans, Travelling Showpeople, the supply of sites, plots and pitches, transit demand and supply of transit sites?
 4. The GTAA (2019) does not show a requirement for more sites for transit plots/pitches and recommends that the effect of recently consented provision on unauthorised encampments is monitored and where necessary reviewed. What monitoring has been undertaken in the intervening period and does this signify any change in needs for transit provision?

Examination into Shropshire Local Plan

5. Please provide a list of council owned sites and private sites along with current vacancy data for each of them.
6. What new pitches have been granted planning permission since 2016/2017 when the GTAA (2017) found a shortfall of 17 pitches in Shropshire?
7. It is clear from the Inspector's report in relation to the SAMDev examination that several historic planning permissions for Gypsy and Traveller sites do not have conditions restricting occupancy to Gypsies and Travellers. If this is the case, can details be provided of whether those sites are currently occupied by gypsies and travellers or by members of the settled population?
8. Did the Council undertake a 'call for sites' capable of meeting future needs and if so, what was the outcome?
9. What is the future supply for the first 5 years, years 6-10 and where possible, years 11-15 in terms of private and public provision respectively in terms of both numbers of pitches and plots? Are there any temporary permissions which could lapse within the plan period which would affect this supply?
10. What measures have been employed within the Council's assessment to ensure that the future supply of sites, plots and pitches will be capable of meeting future needs in terms of size, location, cultural requirements, family connections and tenure type?

Examination into Shropshire Local Plan

Matter 6 – Green Belt and Safeguarded Land (policy SP11)**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 the Green Belt.

Questions

1. What is the basis of the Green Belt Review? What methodology has been applied and is it soundly based? Is the Council's approach to the Green Belt assessment robust and in line with national guidance?
2. Has a comprehensive assessment of capacity within built up areas been undertaken? How have all potential options on non-Green Belt land in the countryside been assessed and discounted?
3. Have opportunities to maximise capacity on non-Green Belt sites been taken (including increasing densities)?
4. Have discussions taken place with neighbouring authorities about whether they could accommodate some of Shropshire's identified housing and employment land needs?
5. How have the conclusions of the Green Belt Review informed the Local Plan? Do decisions on Green Belt releases reflect the need to promote sustainable patterns of development, and prioritise sites which are previously developed and/or well served by public transport? Where is this evidenced?
6. 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?
7. Is the extent of safeguarded land sufficient to meet longer term needs beyond the plan period and are they justified?
8. Do the exceptional circumstances, as required by paragraph 136 of the Framework, exist to justify the Local Plan's proposed removal of land from the Green Belt, including safeguarded land?
9. Does the Local Plan seek compensatory improvements to the environmental quality and accessibility of the Green Belt?
10. Are all the sites proposed for release or safeguarding and their boundaries clearly shown on a map?

Examination into Shropshire Local Plan

Matter 7 – Strategic settlements (policies S19 - S21)**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.

Questions**Policy S19 – Clive Barracks, Tern Hill**

1. Is the 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?
5. Should a map or plan identify specific allocation/areas within the policy area for employment use and the local centre etc?
6. Should the policy be more prescriptive about the types of employment uses?

Policy S20 – Former Ironbridge Power Station

1. Is the policy justified effective and consistent with national planning policy?
2. What planning permissions exist for this site allocation?

Examination into Shropshire Local Plan

3. Have landscape, flood-risk, noise, air quality, natural heritage and heritage assessments been carried out to inform the development of the site?
4. 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.
5. Appendix F of document GC4j (5-year housing land supply statement annexes) shows that it is expected that this site will begin delivering dwellings in 2024/25 at an initial rate of 70 dwellings per annum (dpa). Is this realistic?
6. Should a map or plan identify specific allocation/areas within the site allocation for employment use and the local centre etc?
7. Should the policy be more prescriptive about the types of employment uses?
8. What work has been undertaken in relation to the site's mineral extraction opportunities? Would mineral extraction delay the development of the site?

Policy S21 Strategic Site: RAF Cosford

1. Is the policy justified effective and consistent with national planning policy?
2. Are there exceptional circumstances to justify the removal of the site from the Green Belt?
3. Why is the site being taken out of the Green Belt now? Has there been attempts to remove it from the Green Belt as part of earlier development plans?
4. What other sites were considered for the Midland Air Ambulance Charity headquarters? Were any of them outside of the Green Belt?

Examination into Shropshire Local Plan

Matter 8 – Infrastructure and delivery, monitoring and viability (policies SP1, SP2, SP14)**Issue**

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

QuestionsInfrastructure

1. What strategic infrastructure is necessary for the Local Plan (including saved sites) to be implemented? What is the likely cost? How will it be brought forward and funded?
2. What are the likely impacts of the proposed scale and distribution of development on the various aspects of infrastructure? How have these been assessed?
3. Are the infrastructure requirements clearly set out in a policy/policies in the Local Plan? If not, should they be?
4. Shropshire's Strategic Infrastructure and Investment Plan 2022 includes a number projects that have funding gaps. Are these likely to affect the delivery of the Plan, including the saved sites), and if so how?
5. Are there known sources of funding for development expected to be delivered in the first 5-7 years of the Local Plan? Are these all in the Council's latest Infrastructure Delivery Plan?
6. Will the delivery of strategic infrastructure allow for the delivery of planned development in line with the submitted housing trajectory (examination document GC4p)? If not, what will be the shortcomings and how will the Council address these matters?
7. How will the provision of infrastructure be related in terms of timing/phasing to development proposals / areas?
8. Has the Council produced an Infrastructure Funding Statement as recommended in PPG (Paragraph: 059 Reference ID: 61-059-20190315)? If not, please explain why.
9. Are there effective mechanisms in place between the Council, other neighbouring authorities and infrastructure providers to co-ordinate the planning and provision of infrastructure?

Examination into Shropshire Local Plan

10. How will other agencies and organisations be involved? What level of commitment/agreement is there?

Monitoring / Implementation

11. How will the implementation of the Local Plan be monitored in terms of its effectiveness and any unintended consequences?
12. Are the proposed monitoring indicators measurable?
13. Should the Local Plan's monitoring framework include specific policy objectives, contextual indicators, monitoring targets and triggers for any future remedial actions including a development plan review and update?

Viability

14. Has the viability assessment been carried out following the advice in the PPG?
15. Why was the viability assessment not updated at the regulation 19 stage of the Local Plan preparation and where is the justification for this? Is the viability assessment up to date and does it justify the policies in the Local Plan?
16. Has the Council engaged with landowners, developers, and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessment at the plan making stage?
17. Has appropriate regard been had to the cumulative impacts on development of all existing and proposed local standards, supplementary planning documents and policies?
18. Within Shropshire's Strategic Infrastructure and Investment Plan 2022 there are some projects which rely on developer contributions. Have these been taken into account in the viability assessment?
19. Does the viability assessment identify any issues with viability and if so, what are these? Are they likely to undermine the deliverability of the Local Plan? If so, how does the Council intend to address the issue?

THE END

SHROPSHIRE LOCAL PLAN EXAMINATION

Stage 1 Hearing Statement

Representor unique Part A Ref *	
Matter	
Relevant questions nos	

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

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

Much Wenlock Town Council

Planning & Environment Committee meeting of 5th April 2022

Town Council meeting of 7th April 2022

Shropshire Local Plan – Examination in Public

Note of Meeting with other objectors to the Draft Plan – The Guildhall, 19.00hrs to 20.30hrs, 28th March 2022

Attendees: Sue O’Dowd, Lesley Durbin, Jim Orves, Elizabeth Sutherland, Viv Bellamy, Howard Horsley, Paul Hanafin, David Turner, Robert Toft, Mary Philips, John O’Dowd. Councillors D White (Chair), D Fenwick, C Tyler, W Grainger and M Grace.

Welcome and Introductions

Duncan White welcomed attendees and outlined the purpose of the meeting. This would be an informal conversation to explore whether there is the basis for local objectors to the Plan to co-operate in making a stronger case for Much Wenlock at the EIP.

All attendees introduced themselves and identified their representative role for a local organisation as appropriate. Attendees also set out their interests or potential conflicts of interest.

Mike Grace outlined the Town Council’s (TC) stance on the Draft Local Plan. The TC had asked Shropshire Council (SC) to change the plan so that the community of Much Wenlock could decide future best planning options. This was particularly relevant as the town’s Neighbourhood Plan (MWNP) gave a clear steer as to the style of development it considered appropriate. However, it was clear that the MWNP had been essentially set aside by SC.

MG explained that SC had refused to alter the draft plan and had consistently said this should be debated at the EIP. This meant that the town now needed to make a case which demonstrated the SC’s proposals were unsound in policy and its practical impacts on the ground.

MG invited attendees to share their concerns and any evidence that supported these issues.

Discussion of common concerns

The following headlines arose from the discussion:

Water resources and management – supply/demand, disposal and flood risk were all raised. Clear evidence of water having to be imported to the town on numerous occasions. Additional development would only exacerbate the problem. Sewage disposal capacity is similarly a problem; a suggestion that major additional foul sewage pipe work would be required if HG2 proceeded, with unknown impacts on viability. Plus, potentially severe impacts of below ground construction on the town’s historic environment. Flood risk and its management; no evidence that SC had undertaken a sequential test and understood MW’s status as rapid response catchment or recognised their chosen site as the most flood prone. Deep suspicion that SC’s negotiations with the landowner would generate an effective scheme given past record; viability likely to mean requests for increase of housing numbers, reduced affordable housing contributions etc.

Consultation deficit – there had been minimal public engagement and, if comments had been submitted, these had been ignored. The previous TC had effectively just accepted

SC's proposals without any critical appraisal. Both SC and the previous TC had marginalised the community's views as set out in the MWNP.

Strategic development corridor and traffic – this policy is broad and undetermined with clear likelihood of increasing development pressures and negative impacts of more traffic. From Buildwas proposals we know have a major pinch point at the Gaskell Corner with no solutions; local plan proposals will add to it. Significant implications for whole town and its character. HG2 proposals for a roundabout not necessary and will add to environmental degradation.

Quality of the historic place and needs of the town – local plan needs to take a long view of town's future, its housing/employment needs and best options for future development. Considering the SC site assessments, clear that better alternatives are available if consider proximity to services/centre, accessibility, traffic and design quality. Character and historic quality of the town are critical assets.

Infrastructure and viability – understanding the scope of SC's viability assessments for MW and their proposed site. Given the scale of the proposed development targets, the lack of any infrastructure investment plan for MW is serious. The relationship between the place plan and the local plan proposals is unclear and is an omission for discussion at the EIP.

Actions and Next Steps

- The attendees agreed to co-operate further in developing these concerns.
- MWTC to analyse the recent residents survey and report results [if possible to the upcoming Planning & Environment Committee and TC meetings]
- We would gather as much as evidence as possible (e.g. no. of days water had to be shipped in to the town, flood events/impacts, incidences of vulnerability to historic environment etc) to help build the case, and
- All to share information/copies of submissions, other relevant documents/reports
- MWTC to suggest date for a follow-on meeting after Easter [has been suggested as 20th April]

DRAFT SHROPSHIRE LOCAL PLAN – EXAMINATION IN PUBLIC

Much Wenlock Town Council and Its Community

Discussion notes for meeting of 20th April 2022, 19.00 hrs at the Guildhall

EIP Programme

The EIP programme is now being firmed up and dates in July announced for the first hearings. All 'duly made' objectors have been informed by the Programme Officer. This is the summary of the examination programme:

- 2 May 2022 - Deadline to confirm with the PO whether you wish to exercise your right to appear at an examination hearing session
- 13 May 2022 - Deadline for submission of statements of common ground
- 1 June 2022 - Deadline for submission of hearing statements and any appendices by e-mail
- 3 June 2020 – Deadline for receipt of paper copies of statements (in addition to emailed statements)
- 5 July 2022 – Stage 1 Hearing sessions begin

As a group, we have **two** critical dates

- 2nd May – to decide whether to attend in person
- 1st June – to submit any written representations

The EIP requirements are here: [id6-stage-1-guidance-notes.pdf \(shropshire.gov.uk\)](https://www.shropshire.gov.uk/id6-stage-1-guidance-notes.pdf)

The examination will take place in two stages. Stage 1 Matters, Issues and Questions - will cover the legal and strategic issues identified here [ID7 Matters and Issues - Stage 1](#). Stage 2 will address the site allocations and will take place later in the year.

Stage 1 and Possible Actions

Draft Timetable for the Stage 1 hearing sessions. Commencement date: Tuesday 5 July 2022 then 6th and 7th July, then 12th, 13th and 14th July. 9.30am start at the Sovereign Suite, Shrewsbury Town Football Club.

Eight Matters have been identified by the Inspectors and under each Matter the Inspectors have identified **issues** and **questions** they consider need discussion.

Many are relevant to MW. **However, we do not know yet whether we will be invited to attend any or all these first stage discussions (as we have mostly focussed on the MW chapter of the plan in our objections).** We can and probably should assume we will have the opportunity as Neighbourhood Plans are identified as Question 16 under Matter 1. We can therefore begin preparations for it.

What do we need to say in addition to the Reg 19 statements?

We know that our Regulation 19 submissions/statements have been read by the Inspectors and subsequently they have been requesting further information from SC.

For the Stage 1, we need to find an appropriate place for our objections within the strategic issues that the Inspectors have identified. This doesn't mean repeating our points or the evidence we may have previously submitted. It does mean we must show the unsoundness of the local plan strategy. We can identify or emphasise any added value points and clear weaknesses or gaps in SC submissions. This will also place the Stage 2 site allocations discussion in context and allow us to show the 'strategic fit' of alternative approaches for MW.

We have access to the EIP library of documents and some new evidence sources. We also have new or additional information that has emerged over the past year e.g., the November meeting of local groups, the recent Resident's Survey results and the outcomes of the Buildwas Power Station redevelopment.

A *quick* review of the Stage 1 Matters, Issues and Questions suggests there are several areas of interest. Please flag up any omissions. There are overlaps and some of our concerns don't readily fit into a single category.

Matter	Question	Comments
1	1b Statement of Community Involvement	Important as this underpins the soundness test in respect of consultation; expectations around NPs and precedence set as a result.
	14 equalities	Accessibility issues within the town not being addressed may exclude elderly?
	15 climate change	We need to look at the policy referred to in the question; perhaps relates to flooding and choice of MW as a development area, car dependency etc?
	16 neighbourhood plans	Clearly important as MW seems to have been discarded; advice from Govt (MHCLG - now DLUHC), SC's own statements in response to Inspectors questions etc
2	This is all about the duty to co-operate so may not be relevant/possible	There are subject of interest e.g., site allocations in MW and cross boundary relationships with black country
3	This is about the overall development strategy and questions 1, 11, 19, 23 and 24 would be relevant	<p>Question 19 is especially noted as it deals with SP14 and the strategic development corridor. Q23 suggests small and medium sized sites could be preferred – an opportunity to show there are options for MW that have not been considered by SC. We could set out a potential new strategy or vision for the town here?</p> <p><i>Q24 and review of MW settlement boundaries; we can point to the sudden extension of boundaries at HG2. Key issues = no consultation, no justification except commercial viability, new national policies around good design for new places and previous determinations to resist sprawl etc</i></p>
4	Questions here are around Housing and Employment.	Worth responding to these. Housing is about numbers and strategic delivery of the 5-year supply, the types and MW's contribution. Employment and Q9 could be especially relevant in terms of lack of delivery proposals in the plan and no process or commitment from SC.

7	Strategic settlements; especially S20 Ironbridge Power Station and questions 1-8.	Opportunity to expose the impact of the IPS on MW in all its forms e.g., lack of funding for a highway's solution at Gaskell. Plus, that this is within the Place Plan and provides an additional housing allocation at IPS of 1050.
8	Infrastructure questions 1-10 and Viability questions 14-19	Both need a review. Infrastructure: to consider SC statements that they have the process in place for infrastructure, but no actual schemes/money committed. The work required to address existing flood risk is all associated with the development. Viability: this may be complicated as it may mean viability across the whole plan and issues on the allocated site might be a stage 2 discussion. Need to consider addressing viability for other development options in MW to show alternatives are clearly possible.
NB.	If we can, there will be strength in identifying a theme(s) that runs through all the submissions we make. We must point out the massive gap between local and national policy expectations and the contrary implications for the key centre that is supposedly MW.	For example: Traffic and transport implications would be a common thread and this links with e.g., the open cheque book that is the strategic development corridor policy, accessibility and active travel and choice of best locations for any development, the tranquillity criteria of the AONB, the Conservation Area etc. The newish National Design Guidance would be a useful reference.

Where do we start?

Subject to the invitations we receive, joint working is likely to allow us to engage in more of the discussions than we might do separately. It also helps to show we have a united voice and meets the Inspectors' request to avoid repetition.

Could we agree:

- To advise the Inspectors that we will present a 'single' case to the EIP? If agreeable, we will need to formally advise the Inspectors that this is the case.
- To jointly draft any (up to) 3000-word submissions?
- Who leads the preparation of the submissions?
- Our potential representatives for the hearing sessions?

What might we now need to do?

1. Check SC original evidence documents for relevant statements on MW
2. Check newly submitted SC documents for relevance to MW
3. We need to rebut any assertions made by SC, especially where there is no evidence provided; root these in context of our previously made Reg 19 submissions
4. Identify any points that SC has not addressed in its response to Reg 19 submissions to expose them as reasons for unsoundness of the Plan

5. Assemble any 3000-word statements using new information, emphasising evidence noted previously and addressing points arising from above; making clear lines of argument and ensuring it is directed at the Inspectors questions
6. Identify any formal decisions necessary to meet the Inspector’s requests and ensure transparency.

Sources of Information

This is a link to SC’s evidence base [Microsoft Word - Cover \(shropshire.gov.uk\)](https://www.shropshire.gov.uk) listing all their docs by unique reference number. The reference numbers are used in SCs [GC4 council response to ID1 & 2 \(Planning Inspectors initial questions\)](#) which aims to fill in gaps in the Draft Plan and supporting documents that have been spotted by the Inspectors.

The most recent source document that relates to our Reg 19 statements is the updated SC responses to consultation comments [GC4o SD014.03 - Regulation 19 consultation response summary Schedule 1a](#) .

Plus, there is an additional list of more recent documents drafted just for the EIP on request of the Inspectors, some included in the tables below. We will need to go through some/most of these supporting documents to check what SC is claiming.

Date/origin	Link to [potentially] relevant SC document	Relevance
November 2022	<ul style="list-style-type: none"> • GC4 council response to ID1 & 2 (Planning Inspectors initial questions) 	Tells us that Inspectors have spotted a lot of gaps. SC response shows SC is trying to fill these with topic papers/evidence statements that might be relevant for MW.
This was requested by the Inspectors in ID1 & 2; drafted by SC March 2022	<ul style="list-style-type: none"> • GC4o SD014.03 - Regulation 19 consultation response summary Schedule 1a 	SC first visible attempt at addressing concerns/issues raised by Objectors. Shows lack of understanding of MW, doesn’t rebut/calm many points. List of points addressed might be missing some key issues we have raised.
	<ul style="list-style-type: none"> • GC4l SD003.01 Updated Schedule of Proposed Minor (Additional) Modifications 	.
April 2022	<ul style="list-style-type: none"> • GC4m SD003.02 Schedule of Proposed Main Modifications 	These are all proposed by SC themselves, presumably from internal sources. Some places included none for MW.
Employment	<ul style="list-style-type: none"> • GC4n Topic Paper - Employment Strategy 	Need to look at this for MW and whether e.g., feasibility studies for sites and for business parks now include MW.
Housing	<ul style="list-style-type: none"> • GC4h Housing Strategy (Adopted) - EV063.01 	Suggest working through each of these

•	• GC4i Topic Paper - Housing	
•	• GC4j Five Year Supply Statement 2021 - Draft Shropshire Local Plan - EV048.07	
•	• GC4k Five Year Supply Statement 2021 Executive Summary - Draft Shropshire Local Plan - EV048.08	
•	• GC4p Housing Trajectory for Shropshire (March 2022)	
Infrastructure	• GC4t Shropshire Strategic Infrastructure and Investment Plan 2022	Important we review this and especially address relation local plan, NP, and the Place Plans.
What's not provided yet?	•	
	•	
	•	

Also, in the EIP library, these other docs might be worth a look for relevance to MW:

•	• GC4a Appendix 1(Sustainability Appraisal responses to Reg 19 consultation)	
•	• GC4g Topic Paper - Green Belt	
•	• GC4e Duty to Cooperate - Statement of Common Ground with Newcastle Under Lyme Borough Council - EV031	
•	• GC4f Duty to Cooperate - Statement of Common Ground with Wyre Forest District Council - EV040	
•	• GC4r Duty to Cooperate - Statement of Common Ground with Worcestershire County Council - EV038	
•	• GC4s Duty to Cooperate - Staffordshire County Council Correspondence	
•	• lvss-much-wenlock-ev07141.pdf (shropshire.gov.uk) ?	A landscape assessment of the town undertaken by Gillespies in 2018. Kind of confirms the general review we

		<p>undertook for the NP but makes it very clear. Would have been useful to have seen the brief. Doesn't get to the fine grain of possible locations or within boundary sites that could be considered.</p>
<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • infrastructure-a-strategic-infrastructure-implementation-plan-ev067.pdf (shropshire.gov.uk) 	<p>SC Infrastructure Strategy Dec 2020 document Has unfunded proposals as category A for public bodies then developer funded proposals linked to the local plan – reveals that leaving solutions to developer and the site choice has been driven by their wish to leverage funds rather than best choice for the town.</p>