

Reference	Section	Necessary Modification	Optional Modification	Agreed (Y/N)
OM1	Throughout		<p>1.3.4 ...National Planning Policy Framework (The Framework) was issued in 2012 and most recently revised in December 2023. Prior to this the NPPF was revised in 2018, 2019, 2021 and September 2023. However, technically, the leading document for the purposes of this Examination is the latest 2023 version published in December 2023.</p> <p>This most recent version of the NPPF presents changes to the requirements of providing land for future housing needs. The policy relating to Neighbourhood Plans remains in place as does the overall approach endorsing sustainable development.</p> <p>I understand that the submission version of the NP was prepared reflecting the 2021 version of the NPPF.</p> <p>The QB / LPA has the option to note at the beginning of the NP / Basic Conditions Statement that salient NPPF paragraph references are to the 2021 version of that document – or – undertake a review and update any changed paragraph references to the December 2023 version of the NPPF.</p>	<p style="text-align: center;">Y</p> <p>Neighbourhood Plan updated to confirm the NPPF paragraphs relate to the 2021 version.</p>

			I am content to leave this to the discretion of the QB/LPA providing the user of the NP is left in no doubt or confusion as to the NPPF version referenced in the explanatory text through the NP document.	
M1	Front cover	<p>3.6 Any Neighbourhood Development Plan must specify the period during which it is to have effect. The Three Parishes Neighbourhood Plan does not contain any date on its front cover and moreover there is inconsistency as to the exact period to which it pertains. The Consultation Statement refers in its text to the period up to 2031 while the Basic Conditions Statement refers to the period of 2016 to 2038.</p> <p>3.7 This matter needs to be far clearer, and a date indicated on the front cover of the NP document.</p> <p>3.8 A pragmatic date would be 2023-2038, to reflect the emerging local plan.</p>		Y
M2	Basic Conditions Statement	4.1.1 I have reviewed the Basic Conditions Statement (BCS) (March 2023) and find it to be a relatively clear document, notwithstanding the		Y

		<p>lack of paragraph numbers which make referencing difficult. The BCS states that the NP covers the period from 2023 to 2038. This conflicts with the end date of 2031 as noted in the Consultation Statement.</p> <p>4.1.2 This matter needs to be addressed and a clear date indicated on the front cover of the NP, and consistently referenced in all accompanying documents.</p>		
M3	Basic Conditions Statement	<p>4.1.6 I set out below my observations on the Development Plan Strategic Policies but note that the BCS acknowledged in advance of Table 4 that the LPA is currently preparing a revised local plan for the period 2016 to 2038. This is progressing through its own examination.</p> <p>4.1.7 I note the approach taken by the QB that its NP should reflect the emerging local plan and its relevant strategic policies. Accordingly, Table 4 sets out the emerging Core Strategies and how these are complemented by the proposed policies within the NP.</p> <p>4.1.8 However, while the progress made by the Local Plan review means that it carries weight in the decision-</p>		<p style="text-align: center;">Y</p> <p>A table which demonstrates conformity of the Neighbourhood Plan policies with the adopted Development Plan (Core Strategy and Site and Allocation of Development (SAMDev)Plan forms Appendix 3 of the Cabinet Papers.</p>

		<p>making process, it has yet to be formally adopted. Hence, the extant Core Strategic policies remain those adopted in 2011 and running to 2026.</p> <p>4.1.9 My concern is that although the LPA has confirmed in its Reg 16 submission that the NP policies accord with and reflect the extant Core Strategy policies, no reference to this is included within the BCS. I accept that the emerging Development Plan carries weight given its progress through an Examination in Public (EiP) and Inspectors' interim findings. However, modifications have already been suggested by the Inspectors, e.g. the deletion of Policy SP4 and other modifications may be proposed once the examination has concluded.</p> <p>4.1.10 <u>The BCS currently refers to policy SP4 and cites it in support of a number of proposed NP policies. This will need amending.</u></p> <p>4.1.11 I am of the opinion that the extant Development Plan is still a valid document. As such, and having reviewed the extant strategic policies, I consider that salient extant Core Strategy policies should be set out in</p>		
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		<p>the BCS and cross referenced to specific NP policies.</p> <p>4.1.12 It would therefore be important for a table to be included within the BCS to indicate how the proposed NP policies comply with the extant Core Strategy policies.</p> <p>4.4.4 Table 4 of the BCS explains how the proposed NP policies are in general conformity with emerging strategic policies and highlights specific policies from the emerging Local Plan. I find this to be helpful and pragmatic but not in accordance with current NPPG.</p> <p>4.4.5 Hence, as noted earlier, I advise that a further table needs to be prepared that confirms that the proposed policies find that, subject to modifications detailed later in this report, the NP policies are in general conformity with the relevant strategic policies of the extant Core Strategy policies found within the Development Plan.</p>		
OM2	Throughout		5.1.5 The absence of paragraphs throughout the Plan is a matter of style. However, it makes any reference by a decision maker or user of the document	<p style="text-align: center;">N</p> <p>The document is split into clear sections and the individual policies are clearly set out and identifiable. It is not considered necessary to</p>

			difficult. <u>This in itself does not make the Plan non-compliant, but I would urge any redrafting or future review of the document to bear this in mind.</u>	number the paragraphs at this stage and is proposed to be left as a matter for a future review of the document.
M4	Consultation Statement/ Basic Conditions Statement	5.1.6 The lack of a date on the front cover is not helpful. This should be addressed for clarity and avoid ambiguity, and the references to the NP period brought into consistency in the Consultation Statement and the BCS.		Y
M5	<i>Initial pages</i>	5.1.7 Should the NP move forward to a referendum; the initial pages of the document should be amended to reflect the stage reached. The 'Stage' section on page 4 would need to be redrafted and the 'How to comment' section on page 5 should be deleted.		Y
M6	Figure 1	5.1.8 The geographical context of the NP area is well set out on pages 6 and 7. However, Figure 1 needs to be properly titled (Shropshire Union Canal) and referenced in the text at the bottom of page 6.		Y
OM3	Figure 2		5.1.9 Figure 2 repeats the map at Appendix 1. Both are difficult to read in hard copy. <u>If they can be reproduced in a more</u>	N A hard copy version of the map can be made available on individual request.

			<u>definitive manner this would assist any reader.</u>	
OM4	Page 7		<u>5.1.10 The reference at the bottom of page 7 to flood risk would be helpfully supported by the addition of an extract from the Environment Agency flood risk map for the area in question.</u>	Partially agree A link to the Environment Agency flood risk map is provided.
OM5	Figure 3		<u>5.1.11 The context of the three parishes is helpfully presented, as is the very general overview of housing provision and heritage properties. However, Figure 3 is presented at a very difficult scale to read in hard copy. While I accept that on screen this figure can be expanded, it would assist any reader if the sites marked were listed out clearly. Cross reference to Appendix 3 would also assist any reader.</u>	N It is not considered appropriate for this level of detail in a development plan
OM6	Page 9		<u>5.1.12 Reference to the 2011 census is outdated given that the 2021 data has been in the public domain for some time. Consideration should be given to making reference to the most up to date census information.</u>	N The 2021 Census data currently available is more generic and does not contain the same detailed Parish level data which the 2011 Census provides. It is therefore proposed to keep the referenced data from the 2011 Census.
M7	Page 13	5.1.13 Landscape and Natural Environment comments from page 13 refers in the first paragraph to the 'Shropshire Landscape Assessment'. However, it is unclear when this was published and who by. This should		Y The areas identified are extracts from Shropshire Landscape Typology Assessment, 2006, Shropshire County Council. A link has been provided to the Assessment and the interactive map to identify the areas.

		be clarified, and it would assist any reader if the various areas identified on page 13 are illustrated on the map showing the extent of the NP area.		
OM7	Figure 11		<u>5.1.14 Figure 11 presents generic views of different land classification and again this would have more relevance if the locations of the various views were included.</u>	N To avoid confusion the title to figure 11 has been amended to make it clear the photographs are extracts from the Shropshire Landscape Typology Assessment.
OM8	Page 15		<u>5.1.15 Page 15 presents an explanation of the context for preparing the NP. However, this repeats information contained within the BCS, and consultation statement and I consider it to be superfluous for the submission version of the NP. Should the NP proceed to referendum I would advise that it is deleted and / or included within an updated Consultation Statement.</u>	Y
M8	Page 16 & 17	5.1.16 Pages 16 and 17 contain text which explains the national and local planning policy. I have commented earlier in this report as to the need to be far clearer as to the version of the NPPF used in preparing the NP. I have assumed that the QB have used the version issued in 2021. This needs to be clearly explained.		Y

M9	Page 19	5.1.27 The overview of what the survey covered indicates it to be very relevant to the preparation of the NP. I recommend that for transparency, full details of the questions and responses received need to be in the public domain as they have clearly guided the vision and subsequent policies of the NP. Without that transparency, the rationale for some policies has been difficult to understand.		Y
M10	Page 20	5.1.28 Reference is made to ‘technical evidence’ on page 20. I note that some information is available on the Three Parishes Plan website. However, full details of this evidence have not been presented to me. A list of documents or data used to support the preparation of the NP’s vision and subsequent policies would have been helpful to my examination and I consider it would be important to any user of the Plan.		Y
M11	Policy H1 – HOUSING DESIGN	Include references to extant Core Strategy policies.		Y
M12	Policy H2 – HOUSING MIX AND TENURE	5.3.8 My concern is that the policy makes specific reference to the emerging Local Plan policy. This has not been formally adopted and hence		Y

		<p>there remains the potential for it to be amended or challenged. While I accept that given the progress of the emerging Local Plan, this is unlikely, it would be more appropriate to omit the last sentence of the policy.</p> <p>5.3.9 While reference to emerging policies can be made in the accompanying text, this should also refer to extant Core Strategy policy that relates to housing mix.</p>		
M13	Policy EMP1 – SMALL SCALE EMPLOYMENT	<p>5.4.3 This policy uses the words ‘suitable’ and ‘appropriate’ in its first sentence. These can be misleading to any user. Some promoters of development might find their proposals suitable and appropriate, but the decision makers may take a different view. This isn’t helpful.</p> <p>5.4.4 Given the following two areas of acceptable forms of development, the first sentence should simply read as follows;</p> <p><i>Development proposals that provide employment opportunities will be encouraged in the following circumstances.....</i></p>		Y

		5.4.5 The remaining text can be retained without change. As for all other policies, reference should be made to extant Core Strategy policy at the end of the justification section.		
M14	Policy EMP2 – FARM DIVERSIFICATION	<p>5.4.7 This policy specifically addresses farm diversification and is pertinent given the nature of the NP area. However, given the accompanying text explaining the evidence and justification for this policy, I have concerns that bullet one is unnecessarily restrictive and doesn't accord with either the emerging or extant Core Strategy policies. If the QB only wants to indicate compliance with emerging local policies, then I find this bullet point fails the test and should be deleted.</p> <p>The last bullet point would suffice in addressing the responses from the local consultation exercise which is summarised in the accompanying text.</p> <p>5.4.8 Many of the bullet points, and specifically the 5th bullet point duplicates Policy EMP1 but I accept that this presents an acceptable element of emphasis.</p>		Y

		5.4.9 reference should be made to extant Core Strategy policy at the end of the justification section.		
M15	Policy G1 – PROTECTING OPEN SPACES IN THE THREE PARISHES	5.5.2 With the requirement that reference should be made to the relevant extant Core Strategy policy at the end of the justification section, I find Policy G1 compliant without further modification.		Y
M16	Policy G2 – PROTECTION AND ENHANCEMENT OF BIODIVERSITY	<p>5.5.3 The overall approach of this policy is understood but the initial paragraph appears to mix two specific issues and should be clearer.</p> <p>5.5.4 As written, the policy suggests that all the bullets point listed should be addressed. This is not feasible and does not reflect the different forms and scale of development which require specific consent.</p> <p>5.5.5 I recommend that the policy is redrafted as follows;</p> <p><i>Development should be planned and designed to encourage biodiversity. Where relevant, reflecting its scale and nature, it should enhance local wildlife species and habitats, demonstrating how they aim to achieve at least a 10% net gain for</i></p>		Y

		<p><i>biodiversity. The following are encouraged.....;</i></p> <p>5.5.6 The bullet points can then be listed out</p>		
M17	Policy G2 – PROTECTION AND ENHANCEMENT OF BIODIVERSITY	<p>5.5.7 I note the representation from one party to the last bullet point and concur that, as drafted it is too vague. I recommend that it be re-written as follows;</p> <p><i>Where on-site net gain for biodiversity is not appropriate then other areas will be considered, in accordance with wider government policy and the latest biodiversity metric.</i></p> <p>5.5.9 reference should be made to relevant extant Core Strategy policy at the end of the justification section.</p>		Y
M18	Policy G3 – LOCAL CARBON REDUCTION	<p>5.5.11 I see little need for the word 'local' at the start of the policy. The second sentence and the accompanying bullet points should be redrafted as follows;</p> <p><i>Relevant development proposals should be supported by a statement</i></p>		Y

		<p><i>setting out how the development will achieve this, including an indication of</i></p> <ul style="list-style-type: none"> • <i>compliance with extant energy standards which should aim to exceed building standards.</i> • <i>generation of energy on site from renewable and low carbon sources</i> 		
M19	Policy G3 – LOCAL CARBON REDUCTION	5.5.14 Reference should be made to relevant extant Core Strategy policy at the end of the justification section		Y
M20	Policy T1 – LINKAGES AND CONNECTIONS	<p>5.6.3 I find the policy clear in its approach. However, I recommend that the opening sentence is modified very marginally and the setting out of the policy is made clearer to emphasise the three areas covered;</p> <p><i>Development proposals that support the enhancement and improvement of existing public rights of way, including the Shropshire Union Canal towpath, will be supported where appropriate.</i></p> <p><i>All new planning applications for relevant development should demonstrate safe and accessible</i></p>		Y

		<p><i>routes for pedestrians and cyclists to local services, facilities and existing transport networks, particularly where they link with public transport.</i></p> <p><i>The addition of pavements or any other measures serving the same function should be in keeping with the rural nature of the Three Parishes and their local character.</i></p> <p>5.6.4 reference should be made to relevant extant Core Strategy policy at the end of the justification section.</p>		
M21	Policy T2 – PARKING	<p>5.6.6 My only concern is the reference in the last line of the policy to the Shropshire Local Plan, which as noted elsewhere is yet to be adopted.</p> <p>5.6.7 I suggest that that this reference is omitted, and the sentence simply reads as follows;</p> <p><i>Opportunities, where possible, to provide electric charging facilities for both commercial and domestic development will be supported.</i></p> <p>5.6.8 reference should be made to relevant extant Core Strategy</p>		Y

		policy at the end of the justification section.		
M22	Policy T3 – BROADBAND CONNECTING THE PARISHES	<p>5.6.10 My very minor concern lies with the last bullet point and the onus on any development to ‘ensure’ that Superfast Broadband is available at the point of occupation of new development. This simply might not be feasible and hence I suggest this bullet point is modified as follows;</p> <p><i>Measures taken by the applicants to work with relevant providers to enable Superfast Broadband is made available at the point of occupation or as soon as possible thereafter.</i></p> <p>5.6.11 reference should be made to relevant extant Core Strategy policy at the end of the justification section</p>		Y
OM09	BUILT ENVIRONMENT AND HERITAGE		5.7.1 The opening text of this section is clear and relevant. While I accept it is a matter of style, the inclusion of the Norton in Hales Conservation Area would be better if inserted as part of the main document as opposed to attached as an Appendix.	<p>Partially Agree</p> <p>Appendix 4 is already cross referenced within the text and demonstrates the extent of the Norton In Hales Conservation Area it is not considered necessary to include the map at this point. Appendix 3 which the examiner refers to relates to the listed buildings in the Area, this has been cross referenced in the text of this section.</p>

			5.7.2 I accept that the addition of Appendix 3 within the main text would be cumbersome, but I do recommend that cross reference is made to Appendix 3, in the opening text on page 41.	
M23	Policy LE1 – CONSERVATION OF THE THREE PARISHES HISTORIC CHARACTER	5.7.4 My minor concern lies with the last bullet point. This appears to replicate Policy G4 and should be amended to simply highlight the need to; <i>'Retain the historic sandstone boundary walls.'</i>		Y
M24	Policy LE1 – CONSERVATION OF THE THREE PARISHES HISTORIC CHARACTER	5.7.5 reference should be made to relevant extant Core Strategy policy at the end of the justification section, and the correction of NPP5 to NPPF.		Y
M25	Policy COM1 – COMMUNITY FACILITIES	5.8.2 The second and third sentences of this policy seem to be definitive in the first instance but then suggest exceptions and the bullet points are confusing. While I understand the approach, I feel this is cumbersome and from the second sentence the policy should be redrafted as follows; The proposed re-use of local community facilities by other forms		Y

		<p>of community use will be strongly encouraged.</p> <p>Any proposal that would result in the loss of community amenities will not be supported unless it satisfies the following criteria;</p> <ul style="list-style-type: none"> • The proposed use will provide equal or greater benefits to the community, • Any replacement facilities are built on sites which are accessible by public transport, walking and cycling and have adequate car parking. <p>Proposals for new community facilities, in appropriate locations, will be supported if the development contributes to the health and wellbeing of the public.</p> <p>5.8.3 There is no need for the 3rd bullet point as it is covered by the first.</p>		
M26	Policy COM1 – COMMUNITY FACILITIES	5.8.5 Finally, I have some concern over the reference in the concluding accompanying paragraph on page 44 which suggests that given current permitted development rights and		Y

		<p>the opportunity to change the use of some property with a nominal submission to a LPA, and no need for a formal application, protective policies should be adopted. Only through the designation of an Article 4 Directive can permitted development rights be overridden. A policy indicating protection of community facilities will not in itself over-ride permitted development rights. I consider that this reference is corrected.</p> <p>5.8.6 With the above modification and the requirement that reference should be made to relevant extant Core Strategy policy at the end of the justification section, I find Policy COM1 compliant.</p>		
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