

PAS LOCAL PLAN ROUTE MAPPER TOOLKIT PART 4: LOCAL PLAN SOUNDNESS & QUALITY ASSESSMENT

Why you should use this part of the toolkit

The purpose of this assessment is to provide a 'mock' examination - as far as that is possible - of the drafts of your local plan policies update. It is intended to be particularly helpful for use as part of the development of your emerging local plan policies update and as a final check prior to publication of your Regulation 19 Submission Local Plan policies update. It will help you to identify areas for improvement and understand potential risks to the soundness of the plan or its usability.

How to use this part of the toolkit

There are 50 'key questions' in the assessment matrix below which might seem a lot to get through. But thinking through these questions now could save time and expense further down the line. If you are undertaking a 'partial plan' policies update not all of the content will be relevant to you.

If you are completing this assessment or peer reviewing it for a colleague within or from another authority, you should put yourself into the mind of a Planning Inspector assessing the soundness of the draft local plan policies update by keeping in mind the 'tests' as follows. Is the draft local plan update:

- **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;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **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
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the [National Planning Policy Framework](#).

For some elements, particularly those concerning clarity, you will also need to consider yourself as an end user of the Local Plan policies update.

Provide a brief answer to each question cross referring to evidence that has informed or supports the local plan policies update in order to justify your reasoning and the score you have attributed. Identify any likely implications of not changing your approach or ways in which you may potentially improve the score either through changes to the plan policies update, evidence or further engagement with developers or infrastructure providers recorded in your statement of common ground. But remember that the local plan policies update doesn't need to be supported by reams of evidence. Evidence needs to be proportionate, clear and robust in line with [PAS advice on proportionate evidence](#).

If you find it helpful, you can score your local plan policies update on the degree to which you meet requirements underpinning the question. You can then add up the scores to calculate your confidence in the local plan policies update (on a scale from -100 to +100) and use this as a benchmark for future improvements. Where a particular question is not applicable to your circumstances, please score +2.

How to use the results of this part of the toolkit

You can use the results of this tool throughout the plan making process to assess the extent to which your plan addresses key soundness requirements. There is no requirement to publish or submit this table to the Planning Inspectorate as part of the independent examination, but you may find the assessment (or some elements) helpful to inform changes to your plan or supporting documents

	KEY QUESTIONS	<p style="text-align: center;">Assessment</p> <p style="text-align: center;"><i>Note: In answering the questions, you should be able to reference the document(s) in the plan evidence base (which may include any Statement(s) of Common Ground - both Examination focused and in relation to the Duty to Cooperate). Try to be as precise as possible when referencing evidence sources, including identifying specific sections/ paragraphs where appropriate.</i></p>
Growth Strategy		
A	<p>In no more than 100 words (excluding any referencing) summarise your strategy for delivering growth and development in your area</p>	<p>The strategy reflects the scale, needs and diverse and distinctive rural characteristics of Shropshire including the presence of the West Midlands Green Belt and the Shropshire Hills Area of Outstanding Natural Beauty. The strategy builds on the strong connections between the urban areas, smaller rural settlements and the rural areas they serve to meet the needs of the communities and businesses in the County. The approach seeks to protect and nurture the economic, social and physical fabric of communities, delivering new housing opportunities and a ‘step change’ in economic potential within the different environmental settings and accommodating development in a way that will deliver more sustainable, balanced, inclusive, vibrant, resilient and self-reliant communities. The strategy responds positively to the Shropshire Economic Growth Strategy and to opportunities for new strategic settlements and sites, reflecting the objectives to prioritise investment into principal settlements and other identified strategic locations on the strategic corridors through the County.</p>
B	<p>In no more than 100 words (excluding any referencing) identify the key factors which informed the distribution of development in the local plan policies update</p>	<p>The distribution is based on a settlement hierarchy which directs the majority of growth towards the larger settlements with the most extensive range of services, facilities and infrastructure to support new development. In recognition of Shropshire’s rurality and the importance of ensuring the long-term sustainability of rural communities, the strategy provides for appropriate levels of development within smaller, identified rural settlements. The strategy also responds to opportunities for strategic sites to form sustainable communities in strategic locations. The delivery of new economic potential recognises the existing focus into the centre and north of the County and balances this spatial distribution through new provision into the south and east of the County and into the centre to further strengthen the role of Shrewsbury as the County town. This approach builds on the rail and road networks through the County with further planned improvements to strengthen the sustainability of the proposed pattern of development.</p>
C	<p>List each of the main growth areas and strategic sites and the key infrastructure needed to support delivery</p>	<p>The published Strategic Infrastructure Implementation Plan (SIIP) and associated Place Plan documents support the delivery of the draft Shropshire Local Plan. Please Note: these are live documents which will evolve to support the implementation of the draft Shropshire Local Plan.</p> <p>The SIIP and associated Place Plans bring together information about strategic infrastructure needs across the county – that is, essential infrastructure in order for development and growth to be delivered, including the development strategy. They also provide information on site specific infrastructure needs associated with proposed site allocations. The Place Plan documents also provide information on wider infrastructure priorities.</p> <ul style="list-style-type: none"> • Shrewsbury (Strategic Centre): Various residential, employment and mixed use Sustainable Urban Extension (SUE) sites proposed with range of site related infrastructure detailed in the draft Shropshire Local Plan site specific guidelines (some of these sites are to be supported by preparation of a masterplan). Development to be supported by necessary supporting infrastructure,

including the provision of a coordinated network of green infrastructure, pedestrian and cycle links and vehicle access arrangements. Development to support necessary improvements to both the local and strategic highway (to be determined conjunction with Highways England). A current application for a new North West Relief Road (NWRR) is currently being considered by the Council and is due to be determined by November 2021. If approved, this £81m scheme (fully funded via a combination of DfT, Marches LEP, CIL and Council funding) is due for completion by the end of 2024. Whilst this major piece of infrastructure is coming forward independently of the Local Plan Review process, it is referenced within policy S16 of the Local Plan, and is included within the developer guidelines for site SHR173 – Land West of Ellesmere Road. As a related exercise, in responding to comments from Highways England (now known as National Highways) the Council have prepared a new piece of evidence to support the submission of the Local Plan, which utilizes the new agreed highway model for the NWRR, and incorporates the additional impact of the Local Plan growth proposals (within a non-mitigation environment) to identify likely areas of infrastructure intervention on both the local and strategic road network over the course of the plan period. Discussions are ongoing with National Highways, with the intention to inform the examination with proposed potential funding sources, if necessary. However, it should also be noted that each proposed site allocation in Shrewsbury includes a commitment within their site guidelines to provide all necessary improvements to the local and strategic road network.

- SUE at Bridgnorth (Principal Centre) known as Tasley Garden Village, Bridgnorth (BRD030): Any development to be supported by preparation of a masterplan and delivery of necessary supporting infrastructure. Development to include residential and employment, a new village centre, primary school, medical centre (if required by the CCG), green infrastructure, open space (including sports facilities), public transport links, pedestrian/cycle/vehicular enhancements, necessary local and strategic highway improvements and sustainable drainage.
- Clive Barracks, Tern Hill (Strategic Settlement): Any development to be supported by preparation of a masterplan and delivery of necessary supporting infrastructure. A new settlement involving comprehensive mixed-use redevelopment of predominately brownfield site to provide housing, employment land, a local centre containing a range of local services and facilities, a new primary school, appropriate pedestrian/cycle/vehicular enhancements, necessary local and strategic highway improvements (strategic highway network improvements to be determined conjunction with Highways England), green infrastructure, open space (including sports facilities) and sustainable drainage.
- Shifnal East (SHF018b & SHF018d) Strategic Employment Site: Any development to be supported by preparation of a masterplan and delivery of necessary supporting infrastructure. To include: new utility connections including new electricity connection from west of town, highway improvements along strategic connection to Junction 3 of M54 (strategic highway improvements to be determined in conjunction with Highways England), new highway junction to existing road network with new internal road layout, structural landscaping to form new permanent Green Belt boundary, improved links to pedestrian / cycling networks, improved public transport / peak time shuttle bus connections to town centre and provision of appropriate ancillary services to ensure the sustainability of the development;

		<ul style="list-style-type: none"> • Former Ironbridge Power Station (Strategic Settlement): Any development to be supported by preparation of a masterplan and delivery of necessary supporting infrastructure. A new settlement involving comprehensive mixed-use redevelopment of a part brownfield site to housing, employment a range of local services and facilities with village centre, a primary school, a medical centre (if required by the CCG), green infrastructure, open space (including sports facilities), appropriate pedestrian/cycle/vehicular enhancements, necessary local and strategic highway improvements and sustainable drainage. • RAF Cosford (Strategic Site): For defence and associated uses including training and aviation academy, RAF museum & new Air ambulance HQ. Development to be appropriately coordinated and deliver necessary supporting infrastructure. Development of each element of the site will be informed by a masterplan. Infrastructure includes commensurate improvements to Cosford Railway Station, appropriate pedestrian/cycle/vehicular enhancements, necessary local and strategic highway improvements Strategic (strategic highway improvements to be determined conjunction with Highways England), green infrastructure, open space (including sports facilities) and sustainable drainage. 				
<p>1.</p>	<p>Overall does the local plan policies update clearly articulate the strategy for <u>where</u> and <u>how</u> sustainable development will be delivered and that this is ‘an appropriate strategy’ within the context of paragraph 35 of the NPPF?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The draft Shropshire Local Plan contains a clear, appropriate and sustainable strategy for the level and distribution of development across Shropshire. This strategy is clearly articulated within draft Policy SP2 (and associated strategic, development management and settlement policies). This strategy seeks to positively respond to local needs, characteristics, constraints and opportunities. It also makes appropriate contributions to unmet cross-boundary need, informed by positive and proactive engagement and 'duty to cooperate' discussions (see Statements of Common Ground). The draft Shropshire Local Plan also, through the suite of draft Policies, provides clear mechanisms for achieving the proposed strategy and as such support its delivery. It is considered that this strategy is consistent with the requirements of the NPPF, including the tests of soundness - being positively prepared, justified, effective and consistent.</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: Draft Policy SP2 and associated strategic, development management and settlement policies provide a clear, appropriate and sustainable strategy for the level and distribution of development across Shropshire. The pattern of development proposed seeks to direct the majority of development towards urban areas, but recognising the rurality of much of Shropshire and the importance of ensuring the long-term sustainability of rural communities, this growth in urban areas will be complemented by appropriate new development within Community Hubs (considered significant rural service centres); and to a lesser extent Community Clusters (settlements with aspirations to maintain or enhance their sustainability).</p>				

2.	<p>Is it clear how the amount of development identified for any growth areas or major site allocations has been determined – and that the level proposed is deliverable and justified?</p>	-2	-1	0	+1	+2	
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
		<p>Reason for score: Shropshire Council has undertaken a series of ‘Regulation 18’ consultations which related to the level and distribution of development across Shropshire and specific proposals for individual settlements. These proposals have been informed by extensive consideration of local needs, characteristics, constraints and opportunities. The details and explanation for the level of development across Shropshire is provided within Draft Policy SP2 and its explanation. The details of proposals for specific settlements are further documented within the Draft Settlement Policies (S1-S21). Proposed allocations and assumptions on their capacity are informed by a proportionate and robust evidence base including a proportionate and robust site assessment process which form Appendices to the Sustainability Appraisal. This site assessment process included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt. They have also been informed by ‘Regulation 18’ consultation and appropriate engagement with site promoters.</p>					
		<p>Implications of taking no further action: N/A</p>					
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>					
3.	<p>Is it clear that the local plan policies update provides for the most appropriate level of housing growth using the standard methodology as a starting point? Can you clearly articulate why planned growth levels should not be higher or lower? If you are proposing any material change away from the level of housing indicated by the standard</p>	-2	-1	0	+1	+2	
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
		<p>Reason for score: The proposed housing requirement of around 30,800 dwellings over the proposed plan period is documented within draft Policy SP2 and its explanation. It has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology, whilst also supporting the long-term sustainability of the County. It also provides some flexibility to respond to changes to LHN over the proposed plan period and an opportunity to:</p> <p>a. Respond positively to specific sustainable development opportunities;</p>					

	<p>method, can you clearly justify this through evidence?</p> <p>Does the level of housing provide for an appropriate and justified buffer?</p>	<p>b. Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire;</p> <p>c. Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community;</p> <p>d. Support the diversification of our labour force;</p> <p>e. Support wider aspirations, including increased economic growth and productivity; and</p> <p>f. Make an appropriate contribution to unmet need arising in the Black Country (informed positive and proactive engagement and 'duty to cooperate' discussions – see the relevant Statement of Common Ground).</p> <p>The proposed housing requirement has been the subject of Regulation 18 consultation. It is considered that the proposed housing requirement is appropriately justified and balances/responds to local needs, characteristics, constraints and opportunities. It also makes appropriate contributions to unmet cross-boundary need, informed by positive and proactive engagement and 'duty to cooperate' discussions (see Statements of Common Ground).</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: The proposed housing requirement will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology. The proposed housing requirement also includes an appropriate contribution to unmet housing need arising within the Black Country and agreed through positive engagement and 'duty to cooperate' discussions between the relevant parties (as documented within the relevant Statement of Common Ground).</p>				
<p>4.</p>	<p>Is the distribution of development justified in respect of the need for, and approach to, Green Belt release and can you demonstrate that alternatives to Green Belt release have been fully considered? Can you demonstrate that exceptional circumstances exist to justify green belt release?</p>	<p>-2</p>	<p>-1</p>	<p>0</p>	<p>+1</p>	<p>+2</p>
		<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>
		<p>Reason for score: Most additional development is proposed in locations outside the Green Belt and identified Green Belt release is focused on specific growth requirements to facilitate the strategic approach to the distribution of development identified within Policy SP2. Before proposing the release of land within the Green Belt for development or safeguarding for future development, Shropshire Council has examined fully all other reasonable options for meeting its identified need for development. The methodology used within the Green Belt Assessment and Review and for site assessments undertaken to inform the Local Plan Review is considered appropriate, proportionate and robust. In identifying proposed site allocations, a robust and comprehensive site assessment process has been undertaken, which included consideration of any harm that would result from releasing a site from the Green Belt. Where land is proposed for release from the Green Belt, exceptional circumstances are fully evidenced and justified within an Exceptional Circumstances Statement which takes into account information available at the time of preparation.</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: It is considered that the proposed development strategies and allocations identified to contribute towards achieving the development strategy</p>				

		<p>are appropriate, effective, sustainable, and deliverable. Where land is proposed for release from the Green Belt, exceptional circumstances and compensatory improvements to the remaining Green Belt are set out within the Green Belt Exceptional Circumstances Statement and examination allows for scrutiny of relevant evidence.</p>				
		<p>Reviewer Comments: Green Belt assessment and review has been an important part of preparing the spatial development strategy for the County and identifying preferred options for delivering a sustainable pattern of growth to 2038 and providing for development needs beyond the planning strategy in the Submission Local Plan. Before proposing the release of development land within the Green Belt or safeguarding land for future development, Shropshire Council examined all other reasonable options for meeting its identified needs, including exploring with adjoining local authorities, their ability to accommodate development that would otherwise be located in the Green Belt to meet the needs of our Green Belt communities. However, this development is essential to meet the sustainable growth requirements of communities within or adjoining the Green Belt and it is recognised that most development in Shropshire is proposed in locations outside the Green Belt, some distance from Green Belt settlements. The strategic economic importance of east Shropshire, particularly along the M54/A5 and A458 corridors, and the growth requirements of Green Belt communities are significant considerations and are addressed in the strategic policies and supporting text: SP2 (Strategic Approach); SP12 (Shropshire Economic Growth Strategy); SP14 (Strategic Corridors). Principal policy SP11 (Green Belt & Safeguarded Land) sets out proposed amendments to the Green Belt to facilitate the strategic approach to the distribution of development in Policy SP2. Settlement Policies and supporting text provide specific details on proposals in the Green Belt and provide protections for the openness and permanence of the Green Belt on the release of land for development. The release of safeguarded land for future development is identified in accordance with national policy to meet development needs beyond the current Plan. All land proposed to be released from the Green Belt is justified by exceptional circumstances with compensatory improvements to the remaining Green Belt fully evidenced and justified within a Green Belt Exceptional Circumstances Statement to mitigate for this loss land. Policy SP11 provides continuing policy protections for the Green Belt to maintain the openness of the eastern area of the County within this important protective designation around the Black Country conurbation.</p>				
<p>5.</p>	<p>Is it clear how sites have been selected and have site allocations been made on a consistent basis having regard to the evidence base, including housing and employment land availability assessments, the Sustainability Appraisal and viability assessment? If not, can you justify why?</p>	<p>-2</p>	<p>-1</p>	<p>0</p>	<p>+1</p>	<p>+2</p>
		<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>
		<p>Reason for score: Proposed allocations are informed by a proportionate and robust evidence base including a proportionate and robust site assessment process which form Appendices to the Sustainability Appraisal. The Strategic Land Availability Assessment (SLAA) forms the first stage of this site assessment process, whilst assessment of sites against sustainability objectives forms part of the second stage of this assessment (Stage 2a). This site assessment process also included consideration of such issues as highways, flooding, ecology, heritage, public protection, mineral safeguarding, landscape, and Green Belt.</p>				

		<p>A Whole Plan Viability Assessment has also been undertaken and informed consideration of proposed policies (with financial implications on proposed site allocations and other development) and discussions on site allocations. They have also been informed by 'Regulation 18' consultation and appropriate engagement with site promoters.</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: Proposed allocations are informed by a proportionate and robust evidence base including a proportionate and robust site assessment process which form Appendices to the Sustainability Appraisal. This site assessment process considered in excess of 2,000 sites.</p>				
<p>6.</p>	<p>Does the local plan policies update identify a housing requirement for designated neighbourhood areas?</p>	-2	-1	0	+1	+2
		<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>
		<p>Reason for score: The draft Shropshire Local Plan identifies proposed housing guidelines for all settlements proposed to be identified as Strategic/Principal/Key Centres and Strategic Settlements. These settlements are the focus for development under the proposed strategic approach. Furthermore, the draft Shropshire Local Plan also identifies proposed housing guidelines for proposed Community Hubs, which are considered significant rural service centres. These settlement categories are considered to cover the designated Neighbourhood Plan Areas where a housing guideline is appropriate and likely future Neighbourhood Plan Areas where a housing guideline is appropriate. Indeed, a number of Neighbourhood Plans are being developed in these areas, and in some instances the specific strategy for achieving the proposed residential guideline will be identified within the Neighbourhood Plan itself (Bishop's Castle, Broseley, Cleobury Mortimer and Dorrington (within the Conover Parish Neighbourhood Plan)). However, Shropshire is a very large Local Planning Authority, and covers a very extensive rural area. Due to the scale and nature of the rural area, it was not considered necessary or appropriate to identify proposed residential guidelines for the rural area beyond proposed Community Hubs. Rather, the draft Shropshire Local Plan proposes a mechanism by which Neighbourhood Plans can be used to 'opt-in' to the Community Cluster tier of settlement. Community Clusters are settlements with aspirations to maintain or enhance their sustainability. The draft Shropshire Local Plan includes a proposed Policy (SP9) for managing development within Community Clusters. The approach within this Policy can of course be complemented by specific policies on housing within the draft Neighbourhood Plan. Shropshire Council is very supportive of the preparation of Neighbourhood Plans and in instances where it is appropriate and necessary will, in the future, work with the local community to establish an appropriate residential guideline for the Neighbourhood Plan area, where one is not already identified within the draft Shropshire Local Plan.</p>				
		<p>Implications of taking no further action: It is considered on balance the proposed approach is appropriate. Whilst it does not establish residential guidelines for all of Shropshire, this is in recognition of</p>				

		<p>its characteristics. There may be instances in the future where Shropshire Council needs to work with local communities to establish an appropriate residential guideline for the Neighbourhood Plan area, where one is not already identified within the draft Shropshire Local Plan.</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: The draft Shropshire Local Plan identifies proposed housing guidelines for all settlements proposed to be identified as Strategic/Principal/Key Centres and Strategic Settlements. These settlements are the focus for development under the proposed strategic approach. Furthermore, the draft Shropshire Local Plan also identifies proposed housing guidelines for proposed Community Hubs, which are considered significant rural service centres. The remainder of the rural area does not have specific housing guidelines. This is considered an appropriate and proportionate approach.</p>				
<p>7.</p>	<p>Do site allocations include sufficient detail on the mix and quantum of development, including, where appropriate any necessary supporting infrastructure?</p>	<p>-2</p>	<p>-1</p>	<p>0</p>	<p>+1</p>	<p>+2</p>
		<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>
		<p>Reason for score: All proposed site allocations are supported by draft site guidelines which provide detail on the mix and quantum of development, including where appropriate supporting infrastructure and design requirements. These draft site guidelines are documented in draft Policies S1-S21. They are expected to be read and applied in conjunction with the wider draft strategic and development management Policies of the draft Shropshire Local Plan, which are also relevant to all proposed allocations (as per any other development proposed in Shropshire) and many also address the mix and quantum of development and infrastructure requirements (in addition to a myriad of other relevant issues).</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments:</p>				
<p>D</p>		<p>The Submission Local Plan identifies the economic spatial strategy for Shropshire for the period 2006 to 2038. The economic spatial strategy is presented in strategic policies SP2 (Strategic Approach), SP12 (Shropshire Economic Growth Strategy), SP13 (Delivering Sustainable Economic Growth and Enterprise), SP14 (Strategic Corridors) and also DP9 (Managing and Supporting Town Centres) and DP10 (Tourism, Culture and Leisure) which include:</p> <ul style="list-style-type: none"> • delivery of 300 hectares of employment development to be distributed between the 18 principal settlements and Place Plan areas through the Settlements Policies (Document EV112 paras 4.4 – 4.16 and 5.17 – 5.23); • delivery of 14 hectares per year as a key monitoring indicator of the implementation of the economic spatial strategy and the delivery of the employment land supply (Document EV112 paras 4.4 – 4.16 and 5.17 – 5.23) <p>These targets are important indicators for the economic spatial strategy enabling the authority to determine when to review the Local Plan. These targets are supported by the economic objectives to:</p>				

		<ul style="list-style-type: none"> maintain and enhance the vitality and viability of Shropshire’s network of Town Centres and High Streets; enhance the vital role of tourism, culture and leisure in the local economy and to deliver high quality, sustainable tourism, and cultural and leisure development to meet the needs of our communities. <p>The employment land targets for delivering the economic spatial strategy were determined on the evidence in:</p> <ul style="list-style-type: none"> Strategic Economic Plan (The Marches) EV109 Economic Growth Strategy - Shropshire 2017-2021 EV044 Economic Development Needs Assessment (Shropshire) EV043 Topic Paper – Employment EV112 Employment Land Review – Report EV047 Strategic Employment Areas and Sites - Phase 1 Shrewsbury EV111.01 Strategic Employment Areas and Sites - Phase 2 Shropshire EV111.02 				
8.	<p>Where and how are the targets referred to above to be delivered? Do the sites and indicative capacities that you have identified demonstrate that these targets are achievable? If you are not allocating sites to meet needs identified, can you justify and explain how those needs will be met?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p>The Submission Local Plan sets out an economic spatial strategy to deliver sustainable economic growth by creating the conditions for business investment, promoting strategic and local development opportunities, increasing the scale, accessibility and quality of employment and improving Shropshire’s productivity. The economic spatial strategy will achieve the objectives of national planning policy to (Document EV112 para 1.3):</p> <ul style="list-style-type: none"> set out a clear economic vision and strategy to encourage sustainable economic growth; identify new strategic sites for local and inward investment in locations which provide good prospects for success and match our strategy to our anticipated needs; address potential barriers to investment and provide opportunities to satisfy unmet needs; ensure the strategy can respond in a sustainable manner to additional needs not already anticipated, to new working practices and rapid or unexpected changes in our economic circumstances; support sustainable economic growth in rural areas helping to create a prosperous and diverse rural economy; develop and diversify the agricultural and land-based sectors, support sustainable rural tourism and leisure and meet the social and service needs of rural communities. <p>The aims, objectives and development targets for the economic spatial strategy are set out in a series of integrative strategic and local policies focused principally on policies SP2 (Strategic Approach), SP12 (Shropshire Economic Growth Strategy), SP13 (Delivering Sustainable Economic Growth and Enterprise), SP14 (Strategic Corridors) and also DP9 (Managing and Supporting Town Centres) and DP10 (Tourism, Culture and Leisure).</p>				

		<p>The delivery of the economic spatial strategy and the development targets is presented, explained and justified in the 20 Settlement Policies of the Submission Local Plan comprising the 18 principal settlements each with a Place Plan area many of which contain Community Hub and Community Cluster settlements providing allocated employment sites with guidelines for their development, mitigation of constraints and provision of infrastructure and opportunities for windfall development. These are supported by two Strategic Settlements which propose extensive missed use, brownfield re-development with mitigation of constraints and provision of infrastructure.</p> <p>The achievement of these objectives and the delivery of the 300 hectare employment land requirement at the proposed delivery rate of 14 hectares per year is further evidence in Appendix 6 of the Submission Local Plan setting out an extensive development pipeline comprising 414 hectares at 31st March 2020 (with the sources of supply to be adjusted from the summary at 31st March 2019) (Document EV112 paras 6.2 – 6.38).</p>
		<p>Implications of taking no further action: N/A</p>
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>
		<p>Reviewer Comments:</p> <p>These aims, objectives and development targets are drawn from strategies and programmes that build towards a 'step change' in the performance and productivity of Shropshire's local economy that seeking to (Document EV112 para 3.4):</p> <ul style="list-style-type: none"> • develop the locational opportunity of Shropshire's position on the western edge of the West Midlands conurbation. The east of Shropshire offers considerable potential to attract investment into Shropshire and trade with the larger urban markets in the conurbations of the region; • actively engage in the regional partnership created by the West Midlands Combined Authority and to play an active role in the delivery of the spatial strategy in the Midlands Engine Strategy; • understand the importance of delivering local employment opportunities and developing skills as the single most important driver for improving the social cohesion, health and well-being and social inclusion of individuals in our communities across Shropshire; • understand and address the challenges facing many people in Shropshire through opportunities created by education, skills and lifelong learning to overcome health and economic inequalities in our workforce; • employ the benefits of creating a 'step change' in Shropshire's economy to address deepening levels of deprivation across Shropshire <p>The Submission Local Plan is the primary corporate response to these objectives and provides the means to improve (Document EV112 para 3.3):</p> <ul style="list-style-type: none"> • demand into Shropshire, promoting the County as a good investment location, supported by services to businesses that build their confidence and skills to make successful investments; • inward investment potential by increasing the number and choice of strategic development opportunities and their distribution around the County; • workforce numbers and capabilities through education and training opportunities that build the skills needed by businesses and encourage entrepreneurship;

		<ul style="list-style-type: none"> sustainability and accessibility of the employment offer, focusing a significant proportion of future development into the strategic corridors and principal settlements; quality, range and choice of floorspace, increasing the supply and distribution of modern business and commercial premises in the County. 				
<p>9.</p>	<p>Does the local plan policies update: (i) identify infrastructure that is necessary to support planned growth; and (ii) enable provision of this infrastructure?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The proportionate and robust evidence base assembled to inform the draft Shropshire Local Plan has informed the approach to infrastructure in the draft Shropshire Local Plan. The draft Shropshire Local Plan is supported by such documents as:</p> <ul style="list-style-type: none"> - a Strategic Infrastructure Implementation Plan (SIIP) and associated Place Plan documents. The Council have worked alongside relevant statutory bodies and infrastructure providers in preparing the Plan and these conversations are captured within the SIIP which itself draws upon the conclusions of the County's 18 Place Plans. The Place Plans cover all infrastructure needs in an area, whilst the SIIP focuses on strategic infrastructure needs. The SIIP brings together information about strategic infrastructure needs to support growth across the county – and to deliver its development strategy. It also provides information on site specific infrastructure needs associated with proposed site allocations. The SIIP provides clarity on the infrastructure required for Shropshire's development, helping to identify where developer contributions will be sought, and sets out the general principles the Council will use in determining whether the costs and/or delivery of these infrastructure needs will be met through Section 106 Agreements, Community Infrastructure Levy (CIL) payments, or direct developer funding. Collectively, the SIIP and the Place Plans have an important role in supporting the draft Shropshire Local Plan, providing an important evidence base for infrastructure investment activities. <p>These are live documents which will evolve to support and inform the implementation of the draft Shropshire Local Plan.</p> <ul style="list-style-type: none"> -The Whole Plan Viability Assessment. -The Site Assessment Process (and associated evidence base documents and comments from specialist service areas). <p>Where there is a known infrastructure constraint from otherwise sustainable development proposals, the individual settlement policies identify these needs. Furthermore, key site-specific infrastructure requirements are documented within the draft settlement policies and site guidelines for proposed site allocations. These draft settlement policies and site guidelines are documented in draft Policies S1-S21. Furthermore, a number of the strategic and development management policies address infrastructure requirements associated with development and of course apply to all development proposals, including those on proposed site allocations. Of particular relevance is draft Policy DP25 on Infrastructure Provision, which establishes the approach to infrastructure for development proposals and the approach to ensuring its delivery.</p>				
<p>Implications of taking no further action: N/A</p>						

		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: The draft Shropshire Local Plan is supported by a proportionate and robust evidence base. This includes a Strategic Infrastructure Implementation Plan (SIIP) and associated Place Plan documents, a Whole Plan Viability Assessment and the Site Assessment process. These evidence base documents have informed the identification of infrastructure requirements for settlements, including those associated with development proposals. Key site-specific infrastructure requirements are documented within the draft settlement policies and site guidelines for proposed site allocations. These draft settlement policies and site guidelines are documented in draft Policies S1-S21. Furthermore, a number of the strategic and development management policies address infrastructure requirements associated with development and of course apply to all development proposals, including those on proposed site allocations. Of particular relevance is draft Policy DP25 on Infrastructure Provision, which establishes the approach to infrastructure for development proposals and the approach to ensuring its delivery.</p>				
<p>10.</p>	<p>Can you demonstrate that the transport and other infrastructure needed to support each growth area or strategic site identified in the local plan policies update: (i) can be funded and delivered; and (ii) is supported by the relevant providers/ delivery agents in terms of funding and timescales indicated?</p> <p>Have you identified the extent of any funding gap? If so, are you able to explain why you are confident that any gap can be addressed?</p>	-2	-1	0	+1	+2
		<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>
		<p>Implications of taking no further action: The proportionate and robust evidence base assembled to inform the draft Shropshire Local Plan has informed the approach to infrastructure in the draft Shropshire Local Plan. The draft Shropshire Local Plan is supported by such documents as: - a Strategic Infrastructure Implementation Plan (SIIP) and associated Place Plan documents. The Council have worked alongside relevant statutory bodies and infrastructure providers in preparing the Plan and these conversations are captured within the SIIP which itself draws upon the conclusions of the County's 18 Place Plans. The Place Plans cover all infrastructure needs in an area, whilst the SIIP focuses on strategic infrastructure needs. The SIIP brings together information about strategic infrastructure needs to support growth across the county – and to deliver its development strategy. There are currently major infrastructure improvements in development at the Oswestry Mile End Roundabout (funded by HIF and CIL monies), which will support the delivery of the 'saved' Oswestry site allocations. In Shrewsbury, the North West Relief Road (NWRR) is currently at the planning application stage and is due for determination in November 2021. If approved, this £81m scheme (fully funded via a combination of DfT, Marches LEP, CIL and Council funding) is due for completion by the end of 2024. Whilst this major piece of infrastructure is coming forward independently of the Local Plan Review process, it is referenced within policy S16 of the Local Plan and is included within the developer guidelines for site SHR173 – Land West of Ellesmere Road. As a related exercise, in responding to comments from Highways England (now known as National Highways) the Council have prepared a new piece of evidence to support the submission of the Local Plan, which utilizes the new agreed highway model for the NWRR, and incorporates the additional impact of the Local Plan growth proposals (within a non-mitigation environment) to identify likely areas of infrastructure intervention on both the local and strategic road network over the course of the plan period. Discussions are</p>				

		<p>ongoing with National Highways, with the intention to inform the examination with proposed potential funding sources, if necessary. However, it should also be noted that each proposed site allocation in Shrewsbury includes a commitment within their site guidelines to provide all necessary improvements to the local and strategic road network. The SIIP provides clarity on the infrastructure required for Shropshire's development, helping to identify where developer contributions will be sought, and sets out the general principles the Council will use in determining whether the costs and/or delivery of these infrastructure needs will be met through Section 106 Agreements, Community Infrastructure Levy (CIL) payments, or direct developer funding. Collectively, the SIIP and the Place Plans have an important role in supporting the draft Shropshire Local Plan, providing an important evidence base for infrastructure investment activities. These are live documents which will evolve to support and inform the implementation of the draft Shropshire Local Plan.</p> <p>Mitigation / Action required (if necessary) to move scale to right: Further positive discussions with Highways England to agree a Statement of Common Ground which provides</p> <p>Reviewer Comments: The draft Shropshire Local Plan is supported by a proportionate and robust evidence base. This includes a Strategic Infrastructure Implementation Plan (SIIP) and associated Place Plan documents, a Whole Plan Viability Assessment and the Site Assessment process. These evidence base documents have informed the identification of infrastructure requirements for settlements, including those associated with development proposals. Key site-specific infrastructure requirements are documented within the draft settlement policies and site guidelines for proposed site allocations. These draft settlement policies and site guidelines are documented in draft Policies S1-S21. Furthermore, a number of the strategic and development management policies address infrastructure requirements associated with development and of course apply to all development proposals, including those on proposed site allocations. Of particular relevance is draft Policy DP25 on Infrastructure Provision, which establishes the approach to infrastructure for development proposals and the approach to ensuring its delivery.</p>
<p>Process and Outcomes (see also Toolkit Parts 2 and 3)</p>		
<p>E</p>	<p>What are the cross boundary strategic matters affecting your local plan policies update? List these.</p>	<p>Such matters include housing and employment needs and distribution, gypsy and traveller needs, Local Plan Review mechanisms, Green Belt, cross-boundary infrastructure, highways, minerals, waste, water, heritage and the built environment, the natural environment and sports facilities. Please refer to the Duty to Cooperate Statement of Compliance document and relevant Duty to Cooperate Statements of Common Ground for further information on these matters.</p>

		-2	-1	0	+1	+2
11.	<p>Does your Duty to Cooperate Statement(s) of Common Ground: (i) identify these issues; (ii) identify the bodies you have engaged with or continue to engage with; and (iii) clearly set out not just the process, but the outcomes of this engagement highlighting areas of agreement and of difference?</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Shropshire Council has undertaken proactive engagement and ‘duty to cooperate’ discussions with appropriate bodies, including adjoining and closely related Local Planning Authorities and County Councils and other key partners. This is documented within the Duty to Cooperate Statement of Compliance Document. This document also specifies the key strategic issues identified and discussed through this proactive engagement and ‘duty to cooperate’ discussions and the outcome of these discussions.</p> <p>Furthermore, where necessary Statements of Common Ground (SoCG) have also been prepared with adjoining and closely related Local Planning Authorities and County Councils and other key partners. The SoCG prepared are documented within the Duty to Cooperate Statement of Compliance Document. These SoCG document also document the key strategic issues identified and discussed through this proactive engagement and ‘duty to cooperate’ discussions and the outcome of these discussions.</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: A Duty to Cooperate Statement of Compliance and where appropriate Statements of Common Ground have been prepared which document the proactive engagement and ‘duty to cooperate’ discussions undertaken to inform the draft Shropshire Local Plan, the forms of engagement utilised, key strategic issues identified/discussed and the outcome of these discussions.</p>				
F	<p>Are there any aspects of the local plan policies update not in conformity with national policy? Please set these out and provide justification with reference to evidence for these. Are you satisfied you can robustly defend this on the basis of local evidence?</p> <p><i>For instance, are you seeking to require affordable housing on sites which are below the threshold of major development as defined by national planning policy?</i></p>	<p>All of the policies all in conformity, except a minor aspect of SP16 – Strategic Planning for Minerals, which uses a 3-year average plus 20% rather than a 10-year average as advised by national policy, to ensure a higher level of accuracy.</p>				

		-2	-1	0	+1	+2	
12.	<p>Are there any specific policies in the local plan policies update where there are differences to any policy approach set out in a relevant strategic planning framework (e.g. the London Plan, or a plan produced by a Combined Authority or through voluntary agreement).</p>	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
		Reason for score: There are no differences to the policy approach set out in relevant strategic planning frameworks					
		Implications of taking no further action: N/A					
		Mitigation / Action required (if necessary) to move scale to right: n/a					
		Reviewer Comments: There are no differences to the policy approach set out in relevant strategic planning frameworks. The draft Shropshire Council Local Plan includes a response to its functional relationship with Black Country, whilst Shropshire itself is not a constituent of the WMCA para 3.7					
13.	<p>Is the local plan policies update:</p> <ul style="list-style-type: none"> in conformity with any 'higher level' plans prepared by the Council; and properly reflecting provisions of any made neighbourhood plan? 	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement	
		Reason for score: The Local Plan has been prepared within the context of other related Council strategies. These are most obviously highlighted in Policy SP1 'The Shropshire Test', which directly references the Shrewsbury Big Town Plan, the Local Transport Plan (existing and in development), the Local Economic Growth Strategy and the Public Health Strategy. The Local Plan has suitably reflected provisions made in Neighbourhood Plans, both adopted in development. This is most evidenced in Paragraphs 2.29-2.30 of the local Plan and in Policies S2.1, S4.1, S6.1, S11.2, S13.1, and S15.1.					
		Implications of taking no further action: N/A					
		Mitigation / Action required (if necessary) to move scale to right: N/A					
		Reviewer Comments: LP Policies SP12, SP13 and SP14 – the economic spatial strategy and the scale of employment development in the Submission Local Plan is formulated to deliver the Shropshire Economic Growth Strategy in relation to: the delivery of a 'step change' in the performance and productivity of the local economy; the objective to deliver higher skilled and better paid employment in the County; the focus on strategic economic development in principal settlements along the strategic transport corridors through the County; and the provision of a range of other forms of development and services (i.e. housing, education, digital connectivity, renewable energy and public services) to businesses and communities in order to support the delivery of sustainable economic growth in Shropshire. It is considered the draft Local Plan has been developed within the context of several 'linked' council strategies, and within the context of developing a sound Plan, has incorporated these provisions appropriately within policies. It is considered the Local Plan has had appropriate regard to existing Neighbourhood Plan, acknowledging that in most cases the Local Plan review period goes well beyond the					

		<p>plan period of existing adopted Neighbourhood Plans, and therefore additional growth is needed to be planned appropriately. The Plan suitably reflects the provisions of new Neighbourhood plans in preparation and does not compromise their localised aspirations. Settlement Policy S15 Shifnal does not reflect the Shifnal NP for reasons in the Green Belt Exceptional Circumstances Statement and the Neighbourhood Plan will need to be refreshed to reflect the new Local Plan strategy on adoption.</p>				
<p>14. Does your Consultation Statement demonstrate how you have complied with the specific requirements of the Town and Country Planning (Local Plan) (England) Regulations 2012 and the Council's adopted Statement of Community Involvement to date [you should revisit and update this following the publication of your Regulation 19 local plan policies update]?</p>		-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The Council considers that it has been fully compliant with the requirements with the TCPA and the adopted Statement of Community Involvement.</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
<p>Reviewer Comments: The Council considers that it has been fully compliant with the requirements with the TCPA and the adopted Statement of Community Involvement The Council began preparing the Local Plan review in 2017. At the core of this process is continuous and meaningful community engagement, in line with the Council's Statement of Community Involvement (SCI). This has included six stages of consultation since January 2017 and ending in February 2021. At each stage the Council has consulted widely, utilising the Council's Consultee Database as the starting point. Everyone on this database has received an e-mail in each consultation stage with information on the consultation and how to respond. The consultee database is made up of roughly 4,000 consultees, ranging from statutory (specific) organisations; general consultation bodies; and local consultation bodies along with many individual residents. In line with the Council's SCI, the Council pays great importance to engaging with Parish and Town Councils given their status as the most local form of democratically elected representatives of communities. The Council has used the Shropshire Association of Local Councils (SALC) as the main conduit to Shropshire's many and varied Parish and Town Councils. The Council has ensured that throughout the Regulation 18 consultation stages, Parish and Town Councils have had the opportunity, via SALC, to meet and discuss the emerging Plan with officers. The Council has sought to engage positively with a range of groups throughout the process, and not only at times of consultation. As part of the Duty to Cooperate (DtC), the Council have met on a number of occasions with neighbouring and closely related authorities to discuss and identify any cross-boundary issues and how to tackle them. The Regulation 19 version of the Local Plan provides information on where these discussions have led to a specific intervention.</p>						

		<p>The Council has also sought to engage constructively with planning agents and developers through the Agent and Developer forums in order to communicate progress on the Plan. In addition, the Council hosts a Strategic Infrastructure Forum for infrastructure providers and the Council to identify any capacity shortfall and potential intervention requirements, with the Council's published Implementation Plan and Place Plans capturing this information.</p> <p>Additionally, the council produced a Consultation Statement in December 2020 in line with the start of the Reg-19 Consultation period, which ran for 10 weeks. Originally this was due to run for 7 weeks but this was extended (due to the restrictions imposed by government in January 2021 caused by the COVID-19 pandemic) to allow people who did not have internet access to have more time to view the document in hard copy (such as at council offices and libraries).</p>				
<p>15.</p>	<p>Has the Sustainability Appraisal – incorporating the requirements of the Strategic Environmental Assessment legislation - evaluated all reasonable alternatives? Is it clear why alternatives have not been selected?</p>	<p>-2 No, we do not meet this requirement</p>	<p>-1 No, we may not fully meet this requirement</p>	<p>0 Unclear whether our plan meets this requirement or not</p>	<p>+1 Yes, we are likely to meet this requirement</p>	<p>+2 Yes, we are confident our plan will meet this requirement</p>
<p>Reason for score: The Sustainability Appraisal (SA) was carried out alongside and has informed, the preparation of all stages of the Local Plan. Thus, the Council considers that the SA has evaluated all the reasonable alternatives for all draft policies and proposed site allocations.</p>						
<p>Implications of taking no further action: N/A</p>						
<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>						
<p>Reviewer Comments: Each Regulation 18 consultation stage was subject to SA and a SA Report was publicly available alongside each Local Plan consultation document. Where alternative approaches were proposed by the Plan, these were evaluated, and the outcomes were used to inform the subsequent preparation of policies and the choice of sites for allocation. Each policy option and subsequent policy was evaluated using a scoring matrix which was accompanied by a few paragraphs of text. The latter summarises the main issues from the scoring matrix and draws out the relative merits of each option/policy to support option choice. Similarly, Stage 3 of the combined SA and site assessment process contains a summary evaluation for every site which clarifies why allocated sites were preferred against all the other sites in the Strategic Land Availability Assessment (this comprises the reasonable alternatives) options.</p>						
<p>16.</p>	<p>Does the Sustainability Appraisal adequately assess the likely significant effects of policies and proposals?</p>	<p>-2 No, we do not meet this requirement</p>	<p>-1 No, we may not fully meet this requirement</p>	<p>0 Unclear whether our plan meets this requirement or not</p>	<p>+1 Yes, we are likely to meet this requirement</p>	<p>+2 Yes, we are confident our plan will meet this requirement</p>
<p>Reason for score: The SA clearly defines and identifies likely significant positive and negative effects. Each policy option and emerging policy and every site in the Strategic Land Availability Assessment has been evaluated against these.</p>						

		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The SA identifies likely significant positive and negative effects. A significant positive effect is defined as one which is likely to benefit a large area of Shropshire or a large number of people or receptors, including outside the county. The effect is likely to be direct, permanent, irreversible and of major magnitude. A significant negative effect is defined as one which is likely to have a significant adverse impact on the whole, or on a large part of, Shropshire, on internationally or nationally protected assets or on areas outside the county. The effect is predicted to be direct, permanent, irreversible and of major magnitude. No significant adverse effects were identified for policies. Mitigation measures to remove all identified significant adverse effects for allocated sites have been incorporated into the relevant site guidelines.				
17.	Is it clear how the Sustainability Appraisal has influenced the local plan policies update including how any policies or site allocations have been amended as a result and does it show (and conclude) that the local plan policies update is an appropriate strategy?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The Council considers that the Sustainability Appraisal demonstrates that the Local Plan is an appropriate strategy.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The SA process has been integral to the Local Plan preparation process, with SA being carried out for each Regulation 18 consultation document and the Plan amended in an iterative process. SA Reports were published at each Local Plan Regulation consultation stage and were available for public comment. Tables 1.1 to 1.5 of the SA Environmental Report (Regulation 19 stage) set out how the significant effects identified by the SA have influenced policy development and site allocations.				
18.	Is it clear how an Equalities Impact Assessment has influenced the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: It is considered that an EIA has been appropriately considered at each stage of the Local Plan Review.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: The Issues and Strategic Options document, which represented the first stage of consultation on our Local Plan Review, The Preferred Scale and Distribution of Development document, which represents the second stage of consultation on our Local Plan Review, The Preferred Sites document, which represents the third stage of consultation on our Local Plan Review, the Strategic Sites document, which represents the fourth stage of consultation on our Local Plan Review and the Regulation				

		18: Pre-Submission Draft of the Shropshire Local Plan document, which represents the fifth stage of consultation on our Local Plan Review, have all of these assessments have been subject to Equality and Social Inclusion Impact Assessment.				
19.	Does the Habitats Regulations Assessment consider the local plan policies update in combination with other plans and projects?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Site allocations and saved allocations have been screened individually and in-combination with each other, together with Draft Local Plan policies.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
<p>Reviewer Comments: In-combination' effects occur when otherwise non-significant proposals combine and cumulatively lead to a significant effect. This interaction can occur from proposals within the Draft Local Plan or between the Draft Local Plan and other plans or projects. Some elements of the Draft Local Plan may have a minor residual effect on an international site, but an insignificant one alone. Relevant Draft Local Plan policies and site allocations have been screened against other Shropshire plans and the plans of all surrounding local authorities to check for adverse in-combination effects. The impact pathways identified as requiring consideration were:</p> <ul style="list-style-type: none"> • Road traffic emissions (in-combination effects investigated through the Traffic Report and screened out) • Water quality and quantity (in-combination effects investigated through the Shropshire Water Cycle Study) • Recreational impacts on Fenn's, Whixall, Bettisfield, Wem & Cadney Mosses SAC, Montgomery Canal SAC, Cole Mere Ramsar, Berwyn SPA, Berwyn SAC and the Stiperstones and the Hollies SAC • Light pollution and loss of foraging land for bats from the Tanat and Vyrnwy Bat Sites SAC 						
20.	If the Habitats Regulations Assessment has identified, through 'Appropriate Assessment' that mitigation measures are required, does the local plan policies update adequately identify the measures required and the mechanisms for delivering them?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Mitigation measures have been identified for all international sites which required Appropriate Assessment, and these are referenced in the relevant Draft Local Plan policies. The exception is the River Clun SAC where mitigation measures will be set out in an SPD once restoration measures to bring the SAC back into favourable conservation status have been identified.				
Implications of taking no further action: Development in the river Clun catchment may need to be restricted.						

		<p>Mitigation / Action required (if necessary) to move scale to right: Natural England and the Environment Agency need to identify restoration measures for the River Clun SAC to enable the Council to prepare an SPD.</p>
		<p>Reviewer Comments: The HRA Appropriate Assessment identified impacts on international sites as follows:</p> <p><u>Water quality and quantity</u> Severn Estuary SAC/SPA/Ramsar Site River Clun SAC, River Dee and Bala Lake SAC Montgomery Canal SAC Midland Meres & Mosses Ramsar Phase 1 – Fenemere , Marton Pool (Chirbury), White Mere Midland Meres & Mosses Ramsar Phase 2 – Morton Pool and Pasture, Cole Mere</p> <p><u>Recreation</u> Montgomery Canal SAC The Stiperstones and Hollies SAC Fenn's, Whixall, Bettisfield, Wem & Cadney Mosses SAC Midland Meres & Mosses Ramsar Phase 2 Brown Moss SAC Midland Meres & Mosses Ramsar Phase 1 – Brown Moss, Cole Mere Berwyn SPA Berwyn and South Clwyd Mountain SAC</p> <p><u>Air pollution</u> Hencott Pool Midland Meres & Mosses Ramsar Phase 1 Hydrogeological impacts Hencott Pool Midland Meres & Mosses Ramsar Phase 1</p> <p><u>Airborne dust</u> Midland Meres & Mosses Ramsar Phase 2 – Morton Pool and Pasture, Cole Mere</p> <p><u>Light pollution</u> Tanat and Vyrnwy Bat Sites SAC</p> <p>Relevant settlement policies identify that mitigation measures, as set out in the Draft Local Plan HRA will be needed in accordance with policies DP12, DP13, DP14, DP19, DP20, DP21, DP22 and DP25. The exception is the River Clun SAC where policy DP13 provides for an SPD to set out mitigation measures once restoration measures for the SAC have been identified.</p>

		-2	-1	0	+1	+2
21.	Is it clear how the outcomes and conclusions of the Habitats Regulations Assessment have influenced the local plan policies update?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: HRA was carried out for every Local Plan consultation document with a HRA report being made publicly available each time. The Regulation 19 HRA clearly refers to Draft Local Plan policies and in their turn, policies reference the HRA. The Council is thus satisfied that there is a clear link between the HRA and Draft Local Plan policies.				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Each Regulation 18 consultation document and the Regulation 19 Draft Local Plan were subject to HRA. The sequence of HRA Reports shows how issues were identified and resolved. At the same time, the Draft Local Plan refers to HRA conclusions, particularly with respect to mitigation measures e.g. S8.1 Ellesmere Plan Area paragraph 7 states that 'Mitigation measures will be required to remove any adverse effect from increased recreational pressure arising from development in Ellesmere on the integrity of the Cole Mere Ramsar site and on the Fenn's, Whixall, Bettisfield, Wem and Cadney Mosses SAC/Ramsar site in accordance with Policies DP12, DP14 and DP15. Mitigation measures for recreational impacts are identified in the Plan Habitat Regulations Assessment (HRA) and supporting documents.'				
Housing Strategy						
22.	Can you demonstrate that the policies and proposed allocations in your local plan policies update meet your housing requirement in full and that this can be achieved as a minimum? If not [<i>for instance, because another local authority has agreed to plan for your unmet need</i>], can you explain and robustly justify why?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
Reason for score: The proposed housing requirement of around 30,800 dwellings over the proposed plan period is documented within draft Policy SP2 and its explanation. It has been informed by and will achieve the Local Housing Need (LHN) identified for Shropshire, calculated using Governments standard methodology, whilst also supporting the long-term sustainability of the County. It also provides some flexibility to respond to changes to LHN over the proposed plan period and an opportunity to: a. Respond positively to specific sustainable development opportunities; b. Increase the delivery of family and affordable housing to meet the needs of local communities and support new families coming into Shropshire; c. Support the delivery of specialist housing for older people, people with disabilities and the needs of other groups within the community; d. Support the diversification of our labour force; e. Support wider aspirations, including increased economic growth and productivity; and						

		<p>f. Make an appropriate contribution to unmet need arising in the Black Country (informed positive and proactive engagement and 'duty to cooperate' discussions – see the relevant Statement of Common Ground).</p> <p>The proposed housing requirement has been the subject of Regulation 18 consultation. It is considered that the proposed housing requirement is appropriately justified and balances/responds to local needs, characteristics, constraints and opportunities. It also makes appropriate contributions to unmet cross-boundary need, informed by positive and proactive engagement and 'duty to cooperate' discussions (see Statements of Common Ground).</p> <p>Shropshire Council also considers that it has a robust five-year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. Appendix 5 of the draft Shropshire Local Plan illustrates this supply – identifying completions, commitments (including existing and proposed allocations) and appropriate windfall allowances (for settlements with development guidelines), which totals around 31,000 dwellings (excluding any windfall allowance for the wider rural area). This is expanded upon within the Five-Year Housing Land Supply Statement (2020) for the draft Shropshire Local Plan. The Housing Land Supply will be kept under review as part of the annual assessment of the Five Year Housing Land Supply.</p>
		Implications of taking no further action for local plan soundness and/or effectiveness: N/A
		Mitigation / Action required (if necessary) to move scale to right: N/A
		<p>Reviewer Comments: See above.</p>

<p>G</p>	<p><i>Is there any unmet need in neighbouring areas that you have been formally asked to accommodate? If yes, then list the amount by each local authority area.</i></p>	<p>Positive engagement and ‘duty to cooperate’ discussions have not identified (with one exception) unmet cross-boundary housing need in adjoining Local Planning Authorities which would be appropriately and sustainably met within Shropshire.</p> <p>Evidence published by the Black Country Authorities (consisting of Dudley, Sandwell, Walsall and Wolverhampton Local Planning Authorities), which are currently progressing a joint Local Plan, indicates a significant level of unmet housing need, which is unlikely to be able to be accommodated in a sustainable manner within the Black Country Planning Authority area. Specifically, the Black Country evidence is understood to forecast an unmet housing need of some 28,239 dwellings to 2039 (the end of their proposed Plan period).</p> <p>As such, the Black Country is therefore seeking appropriate contributions from all neighbouring and closely related Local Planning Authorities through the duty to cooperate process, and for these contributions to be included in emerging Local Plan Reviews for those other areas.</p> <p>Whilst Shropshire does not adjoin the Black Country area, and is a self-contained HMA, it is recognised that there are good road and rail links between the two areas, particularly between central and eastern areas of Shropshire and Wolverhampton and Dudley. It is therefore considered appropriate for these two plan making areas to undertake a duty to cooperate.</p> <p>On this basis and following positive engagement and ‘duty to cooperate’ discussions, Shropshire Council has proposed to provide for up to 1,500 dwellings to meet housing needs arising within the Black Country. These dwellings will be incorporated into the wider Shropshire LHN and delivered in accordance with the proposed strategic approach for the distribution of development. This offer has been agreed within a Statement of Common Ground between Shropshire Council and the Association of Black Country Authorities.</p>				
<p>23.</p>	<p>Does your local plan policies update accommodate any of this unmet need where you can sustainably to do so?</p>	<p>-2 No, we do not meet this requirement</p>	<p>-1 No, we may not fully meet this requirement</p>	<p>0 Unclear whether our plan meets this requirement or not</p>	<p>+1 Yes, we are likely to meet this requirement</p>	<p>+2 Yes, we are confident our plan will meet this requirement</p>
		<p>Reason for score:</p> <p>Evidence published by the Black Country Authorities (consisting of Dudley, Sandwell, Walsall and Wolverhampton Local Planning Authorities), which are currently progressing a joint Local Plan, indicates a significant level of unmet housing need, which is unlikely to be able to be accommodated within the Black Country Planning Authority area in a sustainable manner. Specifically, the Black Country evidence is understood to forecast an unmet housing need of some 28,239 dwellings to 2039 (the end of their proposed Plan period).</p> <p>As such, the Black Country is therefore seeking appropriate contributions from all neighbouring and closely related Local Planning Authorities through the duty to cooperate process, and for these contributions to be included in emerging Local Plan Reviews for these areas.</p> <p>Whilst Shropshire does not adjoin the Black Country area, and is a self-contained HMA, it is recognised that there are good road and rail links between the areas, particularly between the central and eastern areas of</p>				

		<p>Shropshire and Wolverhampton and Dudley. It is therefore considered appropriate for these two plan making areas to undertake a duty to cooperate. On this basis and following positive engagement and 'duty to cooperate' discussions, Shropshire Council has proposed to provide for up to 1,500 dwellings to meet housing needs arising within the Black Country. These dwellings will be incorporated into the wider Shropshire LHN and delivered in accordance with the proposed strategic approach for the distribution of development. This offer has been agreed within a Statement of Common Ground between Shropshire Council and the Association of Black Country Authorities.</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: See above.</p>				
24.	<p>Is there a housing trajectory which illustrates the expected rate of housing delivery and ensures the maintenance of a 5-year supply during the plan period?</p> <p>Is your strategy for delivery and implementation clearly articulated and justified to support the trajectory?</p>	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		<p>Reason for score: As outlined within the proposed explanation for draft Policy SP2 "the expected rate of housing delivery over the Local Plan period is around 1,400 dwelling per annum, which is consistent with the annual housing requirement. Whilst it is acknowledged that there will inevitably be fluctuations over time, which may result in annual rates of delivery falling below or exceeding this level, it is expected that this will 'balance out' to ensure that the housing requirement is achieved. As such it is considered that this expected rate of delivery over the Local Plan period of around 1,400 dwellings per annum forms the most robust trajectory of future housing delivery in Shropshire and will be used to assess annual housing delivery." This is considered a reasonable and precautionary approach to preparing a housing trajectory. This trajectory of future housing delivery will be annually reviewed within Shropshire Council's Authority Monitoring Report (AMR).</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: The proposed explanation for draft Policy SP2 identifies a proposed housing trajectory. This will be reviewed annually within the AMR.</p>				
25.	<p>Can you confirm: (i) that the local plan policies update will provide for a 5-year supply of specific deliverable sites on adoption; and (ii) that beyond this 5 year period sites are developable and (iii) if relevant, you have included a 5 or 20 percent buffer to deal with under-delivery.</p>	-2 No, we do not meet this requirement	-1 No, we may not fully meet this requirement	0 Unclear whether our plan meets this requirement or not	+1 Yes, we are likely to meet this requirement	+2 Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Shropshire Council considers that it has a robust five-year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. The Five-Year Housing Land Supply Statement (2020) for the draft Shropshire Local Plan illustrates a 6.72-year housing land supply as at 31st March 2020 based on the proposals within the draft Shropshire</p>				

		<p>Local Plan. It also demonstrates developable land beyond the first five years sufficient to alongside deliverable land to achieve the proposed housing requirement. Consistent with the NPPF a 10% buffer is applied within this assessment. The Housing Land Supply will be kept under review as part of the annual assessment of the Five-Year Housing Land Supply.</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: Shropshire Council considers that it has a robust five-year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. The Five-Year Housing Land Supply Statement (2020) for the draft Shropshire Local Plan illustrates a 6.72-year housing land supply as at 31st March 2020 based on the proposals within the draft Shropshire Local Plan. It also demonstrates developable land beyond the first five years sufficient to alongside deliverable land to achieve the proposed housing requirement. Consistent with the NPPF a 10% buffer is applied within this assessment. The Housing Land Supply will be kept under review as part of the annual assessment of the Five-Year Housing Land Supply.</p>				
<p>26.</p>	<p>Does the level of supply provide any 'head room' (that is additional supply above that required) to enable you to react quickly to any unforeseen changes in circumstances and to ensure that the full requirement will be met during the plan period?</p>	<p>-2</p>	<p>-1</p>	<p>0</p>	<p>+1</p>	<p>+2</p>
		<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>
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		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>				
		<p>Reviewer Comments: Shropshire Council considers that it has a robust five year housing land supply and robust supply over the proposed Plan period, based on the proposals within the draft Shropshire Local Plan. The Five Year Housing Land Supply Statement (2020) for the draft Shropshire Local Plan illustrates a 6.72 year housing land supply as at 31st March 2020 based on the proposals within the draft Shropshire Local Plan. It also illustrates that there is a level of flexibility with regard to the supply identified to achieve the wider proposed housing requirement. The Housing Land Supply will be kept under review as part of the annual assessment of the Five Year Housing Land Supply.</p>				

		-2	-1	0	+1	+2	
<p>27.</p>	<p>Is the Council reliant on the delivery of any ‘windfall’ sites (sites not specifically identified in the development plan) during the plan period and if so, how many and when? Is there compelling evidence to confirm that such sites will continue to come forward?</p>	<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>	
		<p>Reason for score: The draft Shropshire Local Plan and its associated Five-Year Housing Land Supply include appropriate windfall allowances - for individual settlements and the wider Local Authority Area. These allowances are considered appropriate and justified and they positively respond to these settlements/Shropshire’s characteristics, constraints and opportunities. They are also informed by compelling evidence that they will provide a reliable source of supply, including having regard to the strategic land availability assessment (SLAA) and associated Five Year Housing Land Supply Statements, historic windfall delivery rates and expected future trends.</p> <p>Specifically, given the nature of Shropshire, it is not surprising that windfall development (large and small sites) represents a component of the housing land supply in both urban and rural areas. Shropshire is a large rural County containing the town of Shrewsbury, 17 other smaller settlements identified as Principal/Key Centres, and hundreds of other villages and hamlets. Consequently, there is a constant and significant recycling of previously developed land; significant numbers of infill developments; high numbers of conversions of barns and other rural buildings; and significant delivery of affordable exception sites (which will be supplemented by the more diverse mechanisms proposed for such housing within the draft Shropshire Local Plan).</p> <p>As documented within the Five Year Housing Land Supply Statement (2020) for the draft Shropshire Local Plan, the average completion rate on all small scale windfall sites of less than 5 dwellings over the adopted plan period thus far (2006/07-2019/20), is some 378 dwellings per annum. Similarly, the average completion rate on all small-scale windfall sites of less than 5 dwellings over the proposed plan period within the draft Shropshire Local Plan thus far (2016/17-2019/20), is some 361 dwellings per annum. The actual rate for 2019/20 was some 329 dwellings. This again supports the conclusion that windfall development does and will continue to represent an important part of the housing land supply.</p> <p>We would note that windfall development on appropriate larger sites in Shropshire is also a regular occurrence, again reflecting the characteristics, constraints and opportunities of the area.</p> <p>The housing land supply will be kept under review through the annual Five-Year Housing Land Supply Assessment.</p>					
		<p>Implications of taking no further action: N/A</p>					
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>					
<p>Reviewer Comments: Given the nature of Shropshire, it is not surprising that windfall development represents a component of the housing land supply in both urban and rural areas, this is evident in past trends and is expected to continue in the future. Compelling evidence supports assumptions on windfall allowances.</p>							

		-2	-1	0	+1	+2
28.	Does the local plan policies update make it clear what size, type and tenure of housing is required?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: There are specific policies in the draft Plan (including draft Policy DP1 and DP3), which address the size, type and tenure of housing required. These draft Policies positively respond to evidence within the Strategic Housing Market Assessment (SHMA), Right Home Right Place Local Housing Need Surveys undertaken for specific geographies/areas across Shropshire, the Shropshire HomePoint Housing Waiting List and the Draft Housing Strategy.</p> <p>Other affordable housing and cross subsidy policies detail specific requirements for affordable home-led schemes.</p> <p>In addition, relevant site allocation policies can identify known local requirements where this is appropriate. For example, Tasley Garden Village, Bridgnorth (BRD030) proposed allocation highlights need for local employer and key worker housing, whilst Land at Park Hall (PKH002, PKH011, PKH013, PKH029, PKH031, and PKH032) identifies the need for key worker housing associated with the RJAH Hospital and Derwen College.</p>				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		<p>Reviewer Comments: Draft Policies DP1 Residential Mix and DP3 Affordable Housing Provision set out clear expectations, anchored to relevant evidence, as to the expected mix of dwelling sizes, types and tenures and site thresholds for implementation. This is complemented by the wider strategic, development management and settlement Policies of the draft Shropshire Local Plan.</p>				
29.	Does the local plan policies update specifically address the needs of different groups in the community?	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The draft Policies of the draft Shropshire Local Plan positively respond to the evidence of housing need for different groups within the community, as identified within the Strategic Housing Market Assessment (SHMA), Right Home Right Place Local Housing Need Surveys undertaken for specific geographies/areas across Shropshire, the Shropshire HomePoint Housing Waiting List and the Draft Housing Strategy.</p> <p>In particular, draft Policy DP1 residential mix addresses the need for different size and types of housing, accessible, wheelchair housing, and housing for older people and those with disabilities and special needs. Furthermore, draft Policies DP2-DP7 introduce a package of measures for the delivery of affordable housing. Draft Policy DP8 addresses gypsy and traveller accommodation, informed by a Gypsy and Traveller Accommodation Assessment (and subsequent update).</p>				

		<p>The various stages of consultation undertaken to inform the draft Shropshire Local Plan have been informed by Equality and Social Inclusion Impact Assessments (ESIIA), which considers how proposals contribute to equality and social inclusion.</p>				
		<p>Implications of taking no further action: n/a</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: n/a</p>				
		<p>Reviewer Comments: The draft Policies of the draft Shropshire Local Plan positively respond to the evidence of housing need for different groups within the community, as identified within the Strategic Housing Market Assessment (SHMA), Right Home Right Place Local Housing Need Surveys undertaken for specific geographies/areas across Shropshire, the Shropshire HomePoint Housing Waiting List and the Draft Housing Strategy.</p>				
<p>30.</p>	<p>Can your affordable housing requirements, including any geographical variations, be justified?</p> <p>Does the local plan policies update provide for the delivery of the full need for affordable housing? If not, can you explain and justify why?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The proposed policies within the draft Shropshire Local Plan, including those relating to affordable housing, have been informed by a Whole Plan Viability Assessment (supported by a Viability Topic Paper regarding the viability of proposed allocations). It is considered that this assessment supports the proposed affordable housing contributions from open market development schemes, including the proposed north-south divide.</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: The proposed policies within the draft Shropshire Local Plan, including those relating to affordable housing, have been informed by a Whole Plan Viability Assessment (supported by a Viability Topic Paper regarding the viability of proposed allocations). It is considered that this assessment supports the proposed affordable housing contributions from open market development schemes, including the proposed north-south divide.</p>				
<p>31.</p>	<p>Have the needs for travellers and travelling showpeople been adequately assessed in accordance with national policy and have they been based on robust evidence?</p> <p>Does the local plan policies update make adequate provision for the identified needs?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The draft Shropshire Local Plan has been informed by a Gypsy and Traveller Accommodation Assessment GTAA (and subsequent update). The methodology used in the assessment update has refined the approach previously used to support the existing adopted Plan. The conclusions of this assessment have been appropriately reflected within the draft Shropshire Local Plan, particularly draft Policy DP8.</p>				
<p>Implications of taking no further action: N/A</p>						

		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: The draft Shropshire Local Plan has been informed by a Gypsy and Traveller Accommodation Assessment GTAA (and subsequent update). The GTAA is considered to use a robust methodology which is supported by updated data on local authority site occupation. The GTAA 2019 considers levels of pitch supply and pitch need over the Plan period to 2038. The conclusions of this assessment, which do not identify a current requirement for general site allocations or evidence of the need for the identification of sites for longer term provision but recommends policy provision to consider planning applications for appropriate small sites to address any arising needs, have been reflected within the draft Shropshire Local Plan, particularly draft Policy DP8. DP8 provides the criteria based policy against which planning applications can be considered and also identifies the need for monitoring and review. The GTAA does identify a requirement for a permanent plot for Travelling Showpeople but this has met by the grant of planning permission.				
<p>32.</p>	<p>Will the local plan policies update provide for a 5-year supply of deliverable travellers and travelling showpeople pitches to meet identified needs?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The GTAA 2019 confirms levels of pitch supply, including via turnover, and pitch need and on this basis evidences that Shropshire can continue to achieve a five-year supply. From the evidence baseline date of July 2019, the supply will need to be updated to reflect additional planning permissions.				
		Implications of taking no further action: Up to date supply picture is not available to support policy				
		Mitigation / Action required (if necessary) to move scale to right: Update 5 year supply information.				
		Reviewer Comments: The Gypsy and Traveller Accommodation Assessment (GTAA) 2019 update considers the 5-year supply picture in Shropshire. The GTAA 2019 confirms levels of pitch supply, including via turnover, and pitch need and on this basis evidences that Shropshire can demonstrate a five-year supply. From the evidence baseline date of July 2019, the supply will need to be updated to reflect planning permissions that have subsequently been granted, including the required permanent plot for Travelling Showpeople. The conclusions of the GTAA have therefore been appropriately reflected within the draft Shropshire Local Plan, particularly draft Policy DP8.				
<p>H</p>	<p>List any travellers and travelling showpeople sites identified to meet need and the timescales for their delivery</p>	<p>Not applicable (NB Site for Travelling Showpeople has not been allocated but has received planning permission to meet need for permanent plot)</p>				
		<p>Justified approaches to plan policy and content</p>				

33.	<p>Where thresholds are set in policies which trigger specific policy requirements, are these thresholds justified by evidence and is this clear in the supporting text?</p> <p>[You may wish to check each policy setting a threshold]</p>	-2	-1	0	+1	+2											
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement											
		Reason for score: Shropshire Council considers that the policies which trigger thresholds are justified by evidence and in the supporting text.															
		Implications of taking no further action: n/a															
		Mitigation / Action required (if necessary) to move scale to right: n/a															
		Reviewer Comments: The majority of the policies proposed do not have any particular thresholds triggering requirements, however those that do are listed in the table below:															
		<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">Policy</th> <th style="width: 35%;">Thresholds triggering requirements</th> <th style="width: 50%;">Response to Question</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">SP7</td> <td>Yes 3) policy provision where settlement residential guideline exceeded</td> <td>Explanatory text to policy explains how various considerations will be taken into account in achieving the delivery of sustainable development. As such, draft Policy SP7 sets out a clear set of considerations to which regard will be had in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside from increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative to the relevant guideline</td> </tr> <tr> <td style="text-align: center;">SP8</td> <td>Yes 3) approach where settlement residential guideline exceeded</td> <td>Yes. Policy cross reference to Policy SP7 and para 3.61 explanatory text</td> </tr> <tr> <td style="text-align: center;">SP13</td> <td>Yes 7) alternative uses of allocated and protected employment sites are prohibited unless there is a satisfactory supply of employment land in the settlement for the remaining Plan period</td> <td>The policy provides flexibility in the application of the threshold based on evidence of a satisfactory supply of land in the settlement, that the proposed site is not viable for the preferred employment uses, the locality is no longer suitable for employment uses or the proposed use makes a more significant economic, social or other recognised contribution to the settlement or County. The explanatory text sets out the justification for the threshold which places a premium on employment land and premises to support</td> </tr> </tbody> </table>						Policy	Thresholds triggering requirements	Response to Question	SP7	Yes 3) policy provision where settlement residential guideline exceeded	Explanatory text to policy explains how various considerations will be taken into account in achieving the delivery of sustainable development. As such, draft Policy SP7 sets out a clear set of considerations to which regard will be had in determining planning applications which would result in the provision of more dwellings that the settlement's residential development guideline. These include benefits arising from the proposal (aside from increased housing supply), likelihood of delivery of existing commitments, any cumulative impacts of development and increase relative to the relevant guideline	SP8	Yes 3) approach where settlement residential guideline exceeded	Yes. Policy cross reference to Policy SP7 and para 3.61 explanatory text	SP13
Policy	Thresholds triggering requirements	Response to Question															
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SP8	Yes 3) approach where settlement residential guideline exceeded	Yes. Policy cross reference to Policy SP7 and para 3.61 explanatory text															
SP13	Yes 7) alternative uses of allocated and protected employment sites are prohibited unless there is a satisfactory supply of employment land in the settlement for the remaining Plan period	The policy provides flexibility in the application of the threshold based on evidence of a satisfactory supply of land in the settlement, that the proposed site is not viable for the preferred employment uses, the locality is no longer suitable for employment uses or the proposed use makes a more significant economic, social or other recognised contribution to the settlement or County. The explanatory text sets out the justification for the threshold which places a premium on employment land and premises to support															

			our growing business base. The explanatory text also sets out the basis for the flexibility in the policy, that the re-use of land and premises for alternative uses is supported but is subject to the provision of evidence to justify the loss of these important economic assets	
		DP1	<p>Yes.</p> <p>2)a) and b) threshold at which the residential bedroom size mix requirements will apply.</p> <p>3) threshold at which nationally described space standards will apply.</p> <p>4) threshold at which M4(3) requirements apply for dwellings specifically designed for older people and those with disabilities.</p> <p>5) threshold at which M4(3) & M4(2) requirements will apply within general housing schemes.</p> <p>6) threshold at which specialist housing for the elderly or those with disabilities/special needs should be provided</p>	Draft Policy DP1 is informed by a number of evidence base documents including Strategic Housing Market Assessment (SHMA), the Whole Plan Viability Assessment, Right Home Right Place Local Housing Need Surveys undertaken for specific geographies/areas across Shropshire, the Shropshire HomePoint Housing Waiting List and the Draft Housing Strategy. Rationale for these requirements is also summarised across policy supporting text
		DP2	Yes. 2) Encouragement of provision of self-build and custom-build housing plots on sites of 0.5ha or more, 5 or more dwellings in rural areas and 10 or more dwellings elsewhere	Draft Policy DP2 is informed by the Strategic Housing Market Assessment (SHMA). The draft Policy encourages rather than requires provision. Reasons for this approach are clearly set out in the draft Policy explanation, in particular para 4.46
		DP3	Yes. 1a) Site thresholds for affordable housing provision together with expected percentage provision in identified geographies. 1c) links requirement for securing affordable housing delivery to a threshold for open market completions	Rationale detailed across policy supporting text & evidence. Proposed affordable housing contributions respond to affordable housing need identified in Shropshire and information on development viability, from within the Shropshire Viability Study. The requirement for affordable dwellings to be transferred to a Registered Provider no later than at completion of 50% of the

		consented market housing reflects the current established approach
DP9	Yes	Rationale detailed across policy supporting text and evidence (Shropshire Town Centres Study 2020)
DP11	<p>Yes.</p> <p>1b) Proposals for 10 or more dwellings to achieve a minimum of 19% improvement in the energy performance requirement in Part L of the 2013 Building Regulations, until such time as the Building Regulations are increased to a level which exceeds this uplift</p> <p>1c) All proposals for the formation of one or more dwellings should provide a minimum of 10% of the predicted energy needs of the development from on-site renewable and low carbon energy sources.</p> <p>2). New non-residential development of 1,000m² or more floorspace or with a gross site area of 1ha or more will achieve the BREEAM Excellent rating or equivalent standard within an alternative assessment endorsed by Shropshire Council.</p>	NPPG Climate Change section: 'Can a local planning authority set higher energy performance standards than the building regulations in their local plan?' 'Paragraph 012 Reference ID: 6-012-20190315
DP21	<p>Yes</p> <p>8c). A site-specific Flood Risk Assessment will be required for all development in Flood Zone 1 if the site is 1 hectare or larger</p>	NPPF footnote 50 to paragraph 164
DP22	Yes	NPPF paragraph 165

			1. All major development should incorporate Sustainable Drainage Systems			
	DP24	Yes	2. Major development proposals within the Shropshire Hills AONB should provide a proportionate assessment to show how the proposal meets the tests set out in NPPF	NPPF paragraph 172		
	S1-S20		Settlement policies include guidelines for residential and employment development. The residential development guidelines for settlements set out in Policies S1-S20 are a significant policy consideration forming the baseline for the application of draft policy SP7 (Managing housing development)	The settlement and strategic settlement policies covered in Policies S1-S20 indicate how the residential development guidelines are to be met. Where housing proposals which are otherwise compliant with the policies of this Local Plan would lead to the residential development guideline for a settlement being exceeded, SP7 sets out considerations which will be taken into account. SP7 explanatory text explains the importance and role of settlement guidelines. Policy SP7 however recognises that these residential development guidelines are not intended to represent a ceiling on development, but that going beyond it by too great a degree could result in unsustainable development. As such, draft Policy SP7 sets out a clear set of considerations as described relative to SP7 above.		
<p>It is important to note that a distinction is drawn here in Question 33 between thresholds that relate to additional provisions affecting otherwise acceptable uses where development proposals exceed a policy threshold for the size or type of uses and Question 36 relating to restrictions on specified land uses being either acceptable or constrained. The consideration of thresholds and restrictions are considered entirely separately to avoid duplication or repetition in this assessment.</p>						
34.	Does the local plan policies update avoid deferring details on strategic matters to other documents? If it does not, is it clear <i>why</i> matters will be covered in other Development Plan Documents or Supplementary	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
<p>Reason for score: Supplementary documents are only proposed/referenced where necessary and appropriate to add further detail to the policies in the draft Shropshire Local Plan and are limited to a</p>						

	Planning Documents and why this is appropriate?	Housing SPD ; River Clun Catchment SPD , Tasley Garden Village masterplan SPD, Shifnal East masterplan SPD with other masterplans as specifically referenced .				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		<p>Reviewer Comments: Yes. Supplementary Planning Documents (SPDs) are only proposed or referenced where considered appropriate to add further detail to the policies in the draft Shropshire Local Plan. They prevent the Draft Plan and the policies within it being overly lengthy and also provide more flexibility for review and update where necessary to ensure that detailed requirements remain appropriate. Masterplans are an appropriate tool for guiding the development of larger scale development and the SPD process will support stakeholder and community involvement.</p> <ul style="list-style-type: none"> • Housing SPD used to provide appropriate detail and to avoid unnecessary duplication for a range of Housing and other policies in the Plan. The explanatory text to policies identifies where the SPD will apply. • Tasley Garden Village masterplan SPD is identified as part of the site allocation to guide development. Draft site development guidelines for the proposed mixed-use allocation require preparation of a vision, design code and masterplan to be adopted as an SPD. This process will provide an important mechanism for public participation in the detailed pre-application planning processes. This will facilitate a more detailed consideration of the development site with public consultation on the detailed development proposals. • Shifnal East masterplan SPD is identified as part of the site allocation to guide development. Draft site development guidelines for the proposed employment allocation comprising two inter-related sites require preparation of a vision, design code and masterplan for a campus style, strategic employment area to be adopted as an SPD. This process will provide an important mechanism for public participation in the detailed pre-application planning processes. This will facilitate a more detailed consideration of the development site with public consultation on the detailed development proposals. • A River Clun Catchment SPD is needed for compliance with the Habitats Regulations. It will set out the mitigation measures necessary to enable development in the catchment of the river Clun to avoid an adverse effect on the River Clun SAC whilst not preventing the SAC reaching favourable conservation status. It will also include a nutrient calculator to enable applicants to determine the most effective mitigation measures for their proposal. The explanatory text to draft policy DP13 gives more detail. 				
35.	Where the local plan policies update defines a hierarchy do policies throughout the Plan consistently: (i) reflect this hierarchical approach; (ii) make clear the level of protection afforded to designations depending on their status within the hierarchy;	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Shropshire Council considers that the policies relating to a hierarchy are consistent and make clear the level of protection afforded to designations depending on their status within the hierarchy				

	and (iii) is the approach consistent with National Policy?	Implications of taking no further action: n/a		
	[For example, hierarchies could relate to nature conservation, heritage assets, town centres/retail, settlements.]	Mitigation / Action required (if necessary) to move scale to right: n/a		
		Reviewer Comments: The majority of the proposed policies do not relate to a defined hierarchy, however those that do are illustrated in the table below:		

Policy	Policy references Hierarchy	Response to Question
SP2, SP8, SP9	Yes	A Hierarchy of Settlements Assessment (HoS) has been undertaken to inform the draft Shropshire Local Plan. The resultant settlement hierarchy has been clearly documented and consistently reflected throughout the draft Shropshire Local Plan (particularly SP2, SP8, SP9 and S1-S21). The implications of the settlement hierarchy are also clearly documented – with the categorisation of settlements informing the proposed strategy/approach and relevant Policies for managing development in settlements. This draft Policy identifies the Local Plan’s overall approach of focusing growth in strategically agreed locations seeking to deliver sustainable development in line with NPPF. It is considered that this approach is consistent with the NPPF.
SP7	Yes. References settlement hierarchy.	The policy reflects the Local Plan’s overall approach of focusing growth in strategically agreed locations (as identified and set out in Strategic Approach Policy SP2) and appropriately recognises settlement guidelines which provide thresholds as referenced in relation to Qu 33.
SP10	Yes references strategic approach and settlement hierarchy	The policy reflects the Local Plan’s overall approach of focusing growth in strategically agreed locations (as identified and set out in Strategic Approach Policy SP2) and appropriately recognises settlement hierarchy. It also highlights additional protection afforded to Green Belt, AONB and other designated areas with cross reference to other dedicated policies. Approach consistent with NPPF
SP11	Yes. References strategic approach and settlement hierarchy	The policy reflects the Local Plan’s overall approach of focusing growth in strategically agreed locations (as identified and set out in Strategic Approach Policy SP2)

			and appropriately recognises the settlement hierarchy and the specials controls in Green Belt. Approach consistent with NPPF
		SP12	Yes. References strategic approach and settlement hierarchy The policy reflects the Local Plan's overall approach of focusing growth in strategically agreed locations as identified and set out in Strategic Approach Policy SP2. Approach consistent with NPPF
		SP13	Yes. Establishes an ordering of employment generating uses reflecting recent amendments to the Use Classes Order in 2020 The policy reflects the amendments to the Use Classes Order in 2020 that extended the range of permissible employment generating uses with permitted change of use rights between some of these uses. The policy places these uses into a preferred priority order that reflects the objectives for Shropshire to diversify the local 'service' based economy, to guide compatible types of uses into physical clusters, to influence the building design and construction for some critical business floorspace and to ensure that Shropshire can maintain an attractive economic investment offer and that businesses may continue to find appropriate commercial environments and suitable premises for their business operations. This is considered to be consistent with the NPPF objective to provide a positive and proactive strategy to encourage sustainable economic growth and to meet anticipated needs over the Plan period. The policy continues the hierarchy of protection established in the SAMDev Plan that seeks to more rigorously protect higher quality sites and the most sustainable locations. The hierarchy structures this protection to assist the implementation of the flexibility in the policy to permit alternative uses where appropriate subject to evidence to justify alternative uses. This is considered to be consistent with the NPPF objectives to address potential barriers to investment but also to accommodate needs not anticipated in the Plan
	Yes. Establishes a hierarchy of protection for existing employment areas based on the type and quality of the built fabric and employment uses on the sites		

		SP14	Yes. References strategic approach and settlement hierarchy	The policy reflects the Local Plan's overall approach of focusing growth in strategically agreed locations as identified and set out in Strategic Approach Policy SP2. Approach consistent with NPPF
		DP4	Yes references settlement hierarchy in identifying locational preferences	A detailed development management policy which provides for affordable exception housing in locations generally preferred by the strategic approach. NPPF allows for affordable exception housing in the way set out in this policy. It provides a detailed development management policy which cross references the requirements of other relevant plan policies and therefore is not expected to conflict.
		DP5	Yes references settlement hierarchy in identifying locational preferences	A detailed development management policy which provides for entry level exception housing in locations generally preferred by the strategic approach. NPPF allows for entry level housing in the way set out in this policy. It provides a detailed development management policy which cross references the requirements of other relevant plan policies and therefore is not expected to conflict.
		DP6	References settlement hierarchy	A detailed development management policy which provides for limited exception housing in locations not preferred by the strategic approach. Controls in policy will ensure that delivery of housing via this mechanism does not undermine the strategic approach. NPPF allows for exception housing which is limited in the way set out in this policy. Policy cross references the requirements of other relevant plan policies and therefore is not expected to conflict.
		DP7	Yes references settlement hierarchy	A detailed development management policy which provides for cross subsidy exception housing in locations generally preferred by the strategic approach. NPPF allows for cross subsidy exception housing which is limited in the way set out in this policy. The policy cross references the requirements of other relevant plan policies and therefore is not expected to conflict.
		DP8	Yes references settlement hierarchy	The policy reflects the Local Plan's overall approach of focusing growth in strategically agreed locations (as

		identified and set out in Strategic Approach Policy SP2) and appropriately recognises settlement hierarchy. It also highlights additional protection afforded to Green Belt, AONB and other designated areas with cross reference to other dedicated policies. Approach consistent with national policy (NPPF & PPTS)
DP9	Yes	Yes – the hierarchy here reflects the status of the towns in the county, specifically Shrewsbury and the Principal Centres and Key Centres, including their defined Town Centre area (as illustrated in the maps) and recognised high streets. It also references the sequential tests that may be required.
DP11	Yes – references energy hierarchy	Para 4.108 of the explanatory text references the energy hierarchy and para 4.109 explains that the policy follows this approach.
DP12	Yes. Hierarchy of protected sites implicit in policy approach.	Policy has separate sections clearly setting out the different requirements for internationally, nationally and locally designated sites priority species, priority habitats and geological sites. All parts of the policy are consistent with chapter 15 of NPPF and the NPPG Natural Environment section. This differentiated approach was followed in the site assessment process and is reflected in the guidelines for proposed allocated sites.
DP19	Yes. Different requirements for proposals in Source Protection Zones 1, 2 and 3	The policy is clear about the requirements for proposals in each Source Protection Zone and is consistent with national and Environment Agency policy and guidance. This differentiated approach was followed in the site assessment process and is reflected in the guidelines for proposed allocated sites
DP21	Yes. Sequential and Exception test forms part of policy requirement.	The policy clearly sets out the circumstances in which the Sequential Test should be applied and following this, the Exception Test. This differentiated approach was followed in the site assessment process and is reflected in the guidelines for proposed allocated sites
DP22	Yes. Hierarchy of drainage options for provision of SUDS.	The policy clearly identifies a hierarchy for drainage options and follows the NPPG section on Reducing the causes and impacts of flooding: What sort of sustainable drainage system should be considered? Paragraph: 080 Reference ID: 7-080-20150323

		DP23	Yes. Different requirements for hierarchy of heritage assets.	The policy is consistent with the hierarchical approach to the historic environment set out in chapter 16 of NPPF and is clear about the level of protection afforded to designated and non-designated heritage assets. This differentiated approach was followed in the site assessment process and is reflected in the guidelines for proposed allocated sites		
		S1-S21	Yes reference strategic approach and settlement hierarchy	Includes settlement and site allocation policies which reflect the settlement hierarchy and provide for appropriate levels of development in the identified locations and implementation of the strategic approach. The policies reflect Green Belt designation and the Local Plan's overall approach of focusing growth in strategically agreed locations (as identified and set out in Strategic Approach Policy SP2) seeking to deliver sustainable development in line with NPPF.		
		It is important to note that a distinction is drawn here with Question 33 between thresholds that relate to additional provisions affecting otherwise acceptable uses where development proposals exceed a policy threshold for the size or type of uses and Question 36 relating to restrictions on specified land uses being either acceptable or constrained. The consideration of thresholds and restrictions are considered entirely separately to avoid duplication or repetition in this assessment.				
36.	<p>Where policies seek to limit certain uses, is this justified by evidence and is the rationale clear in the supporting text to the policy and in the evidence.</p> <p>[For example, policies relating to town centres, employment or retail may seek to limit certain uses.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score:</p> <p>The Submission Local Plan policies identified below set out restrictions on specific uses in the Green Belt, countryside, smaller settlements designated as Community Hubs and Community Clusters, gypsy and traveller sites, town centres and high streets and established employment areas and sites allocated for employment development in the Plan where these restrictions are clearly explained in relation to national planning policy and the strategic approach or spatial strategy of the Local Plan. The purposes of these restrictions correspond to easily comprehensible planning tools such as scale of development, specific types of uses, specific types of sites or forms of development which are related to the general location such as smaller settlements, countryside or the Green Belt or to specific designations of smaller areas of land or groups of buildings such as town centres, existing or proposed employment areas or gypsy and traveller sites. It is considered that these restrictions, whilst covering a broad range of locations and types of uses are consistent with national policy or the sensible use of land or the protection of important locations or important special provisions within the planning system to deliver development that supports those in need</p>				

		<p>and so, the restrictions are themselves easily comprehensible. The Submission Local Plan policies also set out a number of broader restrictions that support key objectives within the strategic approach of the Local Plan including the mix of residential development and the management of tourism development with the intention of ensuring that development opportunities are managed effectively and appropriately meet the needs of the communities of the County so individuals may secure the right homes, in the right place, at an affordable cost and which support their individuals needs for suitable accommodation and the County may attract the right mix of people with the right skills to contribute to the vitality and viability of Shropshire. Again, these requirements are consistent with national policy or the sensible use of land or special provisions within the planning system to deliver development to support those in need and are themselves easily comprehensible. The policies also seek to provide flexibility in the application of these restrictions wherever possible and the policies, explanatory text and supporting evidence explain the circumstances, evidence and justifications necessary to secure this flexibility in relation to individual development proposals.</p>			
		<p>Implications of taking no further action: N/A</p>			
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>			
		<p>Reviewer Comments: The rationale set out above for the restrictions on certain land uses in the identified locations highlights the reasons for the inclusion of these policy mechanisms in the Local Plan. The rationale also recognises where it is appropriate to do so, that in some instances, these policy mechanisms may be laid aside where a more flexible approach is appropriate and can be justified. Consequently, the use of these mechanisms must be viewed in the wider context of the normal operation of the planning system: where the Local Plan is required to be the primary means of managing the use of land and development, the implications of particular designations of land are explained in the Local Plan and so may be regarded as being entirely predictable outcomes of sensible planning provisions, planning applications are considered on their merits in relation to the Local Plan and to evidence presented in support of the development proposals, the Local Planning Authority may in exceptional circumstances elect to depart from the Local Plan provisions, material matters for a development may reasonably be discharged through the use of conditions or where restrictions are enforced, every applicant has the right of appeal through which to test the policy restrictions. The restrictions are therefore sensible and appropriate and with the possible exception of restrictions imposed by national policy, may be open to the flexible interpretation of policy or be laid aside on the basis of a justification for exceptional circumstances relating to individual development proposals. It is important to note that a distinction is drawn here in Question 36 between restrictions on specified land uses being either acceptable or constrained and Question 33 that relates to additional provisions affecting otherwise acceptable uses where development proposals exceed a policy threshold for the size or type of uses. The consideration of restrictions and thresholds are considered entirely separately to avoid duplication or repetition in this assessment.</p>			
		<table border="1"> <thead> <tr> <th style="text-align: center;">Policies limiting uses</th> <th style="text-align: center;">Justification & where rationale is provided</th> </tr> </thead> <tbody> <tr> <td>SP10 strictly controls open market residential development in</td> <td>SP10 - reflects the Local Plan's overall approach of focusing growth in strategically agreed locations (as identified and set</td> </tr> </tbody> </table>	Policies limiting uses	Justification & where rationale is provided	SP10 strictly controls open market residential development in
Policies limiting uses	Justification & where rationale is provided				
SP10 strictly controls open market residential development in	SP10 - reflects the Local Plan's overall approach of focusing growth in strategically agreed locations (as identified and set				

		<p>countryside & limits use of holiday lets for permanent residential use and residential changes of use of community facilities</p> <p>SP11- restricts development on previously developed sites to that for development for employment or economic uses, defence uses, local community use, including outdoor sport and recreation, or affordable housing</p> <p>DP8 restricts mixed uses on rural exception sites</p>	<p>out in Strategic Approach Policy SP2) seeking to deliver sustainable development and support and maintain sustainable communities in line with NPPF. Rationale for holiday let and change of use restrictions provided in explanatory text (paragraphs 3.86). SP10 approach also supports SP6 objectives.</p> <p>SP11- identifies circumstances when development may be acceptable in line with National Policy, whilst also providing for requirements in the Shropshire context. The draft Policy in seeking reuse of previously developed land to meet identified local affordable housing need rather than for open market housing is consistent with the proposed strategic approach to development (within draft Policy SP2). Local housing need is evidenced.</p> <p>DP8 - Restriction reflects national policy (PPTS)</p>
		<p>SP2(4) seeks to focus main town centre uses into the diverse network of town centres and recognisable high streets across Shropshire.</p> <p>SP2(6) open market residential development in rural areas.</p> <p>SP8 documents the types and geographies of open market residential development appropriate within proposed Community Hubs.</p> <p>SP9 documents the types and geographies of open market residential development appropriate within proposed Community Clusters.</p> <p>DP1</p>	<p>SP2(4) Greater detail is provided within draft Policy DP9.</p> <p>SP2(6) Greater detail provided within associated draft Policies.</p> <p>SP8 and SP9 reflect the Local Plan's overall approach of focusing growth in strategically agreed locations (as identified and set out in Strategic Approach Policy SP2) seeking to deliver sustainable development in line with NPPF.</p>
		<p>DP10 seeks to resist holiday let accommodation in countryside locations which do not conform to the legal definition of a caravan</p>	<p>DP10 – uses NPPF as its rationale under para 80, as the conversion of existing holiday lets to residential use potentially negatively impacts on the visitor economy and so this policy seeks to limit this impact.</p>
		<p>SP13 types of employment uses on employment sites and alternative uses on existing employment areas</p>	<p>SP13 limits on types of employment uses on employment sites</p> <p>SP13 limits on alternative uses on existing employment areas</p>

		<p>As above, it is important to note that a distinction is drawn here with Question 33 between thresholds that relate to additional provisions affecting otherwise acceptable uses where development proposals exceed a policy threshold for the size or type of uses and Question 37 relating to restrictions on specified land uses being either acceptable or constrained. The consideration of thresholds and restrictions are considered entirely separately to avoid duplication or repetition in this assessment.</p>				
<p>37.</p>	<p>Is it clear that any standards proposed for development are justified and deliverable, taking into account the scale of the development?</p> <p>[For example, onsite provision of open space, optional technical standards, internal and external space standards.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The draft Shropshire Local Plan is informed by a proportionate and robust evidence base. This evidence base has informed the standards proposed for development within the draft Policies of the draft Shropshire Local Plan. Key evidence base documents in this context include the Strategic Housing Market Assessment (SHMA), Right Home Right Place Local Housing Need Surveys undertaken for specific geographies/areas across Shropshire, the Shropshire HomePoint Housing Waiting List, the Draft Housing Strategy, Economic Development Needs Assessment (EDNA), Open Space Needs Assessment, Green Infrastructure Strategy and the Whole Plan Viability Assessment. These proposed standards are also considered to positively respond to national policy and guidance and best practice.</p>				
		<p>Implications of taking no further action: n/a</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: n/a</p>				
<p>Reviewer Comments: DP1 provides an overarching residential development policy. As well as setting out expectations for the proportions of dwellings types (by bedroom number) on residential sites, it also incorporates standards providing for accessibility defined by appropriate reference to Building Regulations and incorporates national space standards for affordable dwellings. There is an expectation that on larger sites appropriate specialist dwellings are also provided. Expectations of mix are across affordable and market developments & the categories are not mutually exclusive (e.g. 3 bed affordable M4(3) compliant dwellings) which facilitates achieving policy guidelines, including those in other policies such as DP3 relating to affordable housing provision requirements. It is considered that the draft Policy provides an appropriate balance between ensuring new development includes an appropriate mix of dwellings to meet the needs of communities and providing certainty whilst allowing some flexibility. The approach proposed in part 2a of the policy allows for the residential mix on a site to positively respond to the most recent information on local housing need for communities, whilst the mix proposed within para 2b of draft is informed by the SHMA and community feedback. The approach to nationally described space standards proposed within Para 3 positively responds to the evidence available within the SHMA and other sources as described in Policy supporting text. The requirements relating to M4(2) accessible and adaptable dwellings/M4(3) wheelchair user dwellings also respond to the SHMA which identifies growth in the number of older persons' households and reflects the Government's reform of Health and Adult Social Care which is underpinned by a principle of sustaining people at home for as long as possible. It is recognised the</p>						

		<p>application of 5% M4(3) policy requirements will need to be detailed by the Housing SPD so that there is additional clarity in respect of expectations on smaller sites.</p> <p>Policy DP11 proposes that residential development meet a minimum of 19% improvement in the energy performance requirement of Part L of the 2013 Building Regulations and that non-residential achieves a BREEAM Excellent rating or equivalent. Both requirements comply with the NPPG Climate Change section: Can a local planning authority set higher energy performance standards than the building regulations in their local plan? paragraph 012 Reference ID: 6-012-20190315 and so are considered justified. They have also both been evaluated in the Whole Plan Viability Assessment and are considered to be deliverable.</p> <p>Policy DP12 proposes that all development delivers at least a 10% net gain for biodiversity. This complies with the forthcoming Environment Act so is considered to be justified. It has also been evaluated in the Whole Plan Viability Assessment and is considered to be deliverable.</p> <p>Policy DP15 requires new housing developments to provide on-site open space provision equivalent to 30sqm per person, assuming one person per bedroom. This is consistent with paragraph 6.2.2 of the Open Space Needs Assessment and so is considered to be justified. It has also been evaluated in the Whole Plan Viability Assessment and is considered to be deliverable.</p> <p>Policy DP20 requires new residential development to meet the Building Regulations 110 litres per person per day standard for water. This is consistent with the recommendations in the Water Cycle Study, section 4.8, table 4.12 and so is considered to be justified. It has also been evaluated in the Whole Plan Viability Assessment and is considered to be deliverable.</p> <p>Policy DP27 requires new development, change of use and conversion of residential and business premises to maintain and improve the connectivity of the location to mobile voice and data communications networks, provide gigabit capable broadband connectivity through fibre to premises technology to all premises and provide passive ducting wherever possible to facilitate the delivery of competitive fibre broadband services. This is consistent with the Council's current Connecting Shropshire Strategy 2016 - 2020 and the future £5bn UK 'Project Gigabit' to provide faster, reliable broadband into areas of the UK where commercial viability currently restricts investment by broadband infrastructure suppliers but where these services provide important social, economic and environmental benefits for communities, the economy and the management of climate change and other impacts from mankind.</p>
	<p>Deliverability</p>	

38.	Has the viability of the local plan policies update been suitably tested and does this testing cover all requirements including in respect of any required standards, affordable housing provision and transport and other infrastructure needs and if relevant the implications of CIL?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: To inform the draft Shropshire Local Plan, a whole Plan Viability Assessment has been undertaken. This Whole Plan Viability Assessment uses a methodology consistent and compliant with the requirements of the National Planning Policy Framework (NPPF), relevant National Planning Practice Guidance (NPPG), the Harman Guidance, the Royal Institute of Chartered Surveyors (RICS) guidance: Assessing viability in planning under the NPPF 2019 for England, 1st Edition; and the RICs guidance: Financial viability in planning: conduct and reporting RICS professional statement, England, 1st Edition. The Whole Plan Viability Assessment had regard to and directly informed the proposed policy requirements within the draft Shropshire Local Plan. It also had regard to existing CIL rates.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
39.	Does the local plan policies update reflect the conclusions and recommendations of your viability evidence? Is it clear the viability and delivery of development will not be put at risk by the requirements in the local plan policies update?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: A Whole Plan Viability Assessment has been undertaken to inform the draft Shropshire Local Plan. This has regard to and directly informed the proposed policy requirements within the draft Shropshire Local Plan. It also had regard to existing CIL rates.				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
40.	Does the monitoring framework clearly set out what matters will be monitored, and the indicators used? Are these measurable and can the data be readily secured/captured?	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Appendix 4 of the draft Shropshire Local Plan identifies the proposed monitoring framework. This framework includes appropriate indicators for each of the draft Policies proposed within the				

		draft Shropshire Local Plan. These indicators will be reported on within the Authority Monitoring Report (AMR).				
		Implications of taking no further action: N/A				
		Mitigation / Action required (if necessary) to move scale to right: N/A				
		Reviewer Comments: Appendix 4 of the draft Shropshire Local Plan identifies the proposed monitoring framework. This framework includes appropriate indicators for each of the draft Policies proposed within the draft Shropshire Local Plan. These indicators will be reported on within the Authority Monitoring Report (AMR).				
41.	<p>Does the local plan policies update and monitoring framework identify a clear framework for <u>plan review</u>?</p> <p>Where triggers for plan review and/or update are identified are they justified and proportionate?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: Nationally there is a requirement to review Local Plans every 5 years. Furthermore, the draft Shropshire Local Plan also identifies other factors which can be used as indicators for the need to undertake a future Plan review, including housing land supply/delivery (explanation to draft Policy SP2) and gypsy and traveller needs (draft Policy DP8 and its explanation).				
		Implications of taking no further action: n/a				
		Mitigation / Action required (if necessary) to move scale to right: n/a				
		Reviewer Comments: Nationally there is a requirement to review Local Plans every 5 years. Furthermore, the draft Shropshire Local Plan also identifies other factors which can be used as indicators for the need to undertake a future Plan review, including housing land supply/delivery (explanation to draft Policy SP2) and gypsy and traveller needs (draft Policy DP8 and its explanation).				
Plan effectiveness (and associated policy clarity)						
42.	<p>Does the local plan policies update clearly set out the timeframe that it covers? Is it clear which policies are strategic? Will the strategic policies provide for a minimum of 15 years <u>from adoption</u>? Does the evidence relied on to support those policies correspond/cover this whole period?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		Reason for score: The draft Shropshire Local Plan and its key supporting evidence are clear that they address the period 2016-2038 (some evidence has been updated by subsequent/associated studies as appropriate). Indeed, this is reiterated throughout the draft Shropshire Local plan, notably in the introduction and within the overarching strategic approach proposed in draft Policy SP2.				
		Implications of taking no further action: N/A				
Mitigation / Action required (if necessary) to move scale to right: N/A						

	<p>Reviewer Comments: The draft Shropshire Local Plan is organised so that primarily draft strategic policies are grouped together and are recognisable by naming format. This therefore clearly indicates those draft Policies which are primarily strategic and those which are primarily Development Management policies. It is anticipated that there would be 15 years within the proposed Plan period remaining (to 2038) at the point of adoption, current forecasts suggest adoption in July/August 2022, whilst the proposed Plan period would actually allow for adoption in 2023.</p>										
<p>43.</p> <p>Does the local plan policies update clearly set out which <u>adopted</u> Development Plan policies it supersedes?</p>	<table border="1"> <tr> <td data-bbox="302 343 571 375">-2</td> <td data-bbox="571 343 817 375">-1</td> <td data-bbox="817 343 1019 375">0</td> <td data-bbox="1019 343 1220 375">+1</td> <td data-bbox="1220 343 2105 375">+2</td> </tr> <tr> <td data-bbox="302 375 571 502">No, we do not meet this requirement</td> <td data-bbox="571 375 817 502">No, we may not fully meet this requirement</td> <td data-bbox="817 375 1019 502">Unclear whether our plan meets this requirement or not</td> <td data-bbox="1019 375 1220 502">Yes, we are likely to meet this requirement</td> <td data-bbox="1220 375 2105 502">Yes, we are confident our plan will meet this requirement</td> </tr> </table> <p>Reason for score: The introduction of the draft Shropshire Local Plan provides a summary of the status of existing adopted Local Plan policies and site allocations upon adoption of the draft Shropshire Local Plan. Specifically, it states “Upon adoption the policies of the Shropshire Local Plan 2016 to 2038 will replace the policies of the Core Strategy and SAMDev Plan, except for the SAMDev site allocations which have yet to be delivered, which will be ‘saved’ and therefore continue to form part of the Development Plan. The policies and proposals within adopted formal Neighbourhood Plans which conform with the Shropshire Local Plan 2016 to 2038 will also continue to apply.” Appendices 1 and 2 of the draft Shropshire Local Plan provide further detail on this matter, clearly documenting the proposed status of existing Core Strategy and SAMDev Plan policies and site allocations (site location, extent, development guidelines and approximate provision figures identified within the SAMDev Plan.) upon adoption of the draft Shropshire Local Plan.</p> <p>Implications of taking no further action: N/A</p> <p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: A summary of the proposed status of Core Strategy and SAMDev Plan policies and site allocations is provided within the introduction of the draft Shropshire Local Plan. Further detail is provided Appendices 1 and 2 of the draft Shropshire Local Plan.</p>	-2	-1	0	+1	+2	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
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<p>44.</p> <p>Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?</p>	<table border="1"> <tr> <td data-bbox="302 1013 571 1045">-2</td> <td data-bbox="571 1013 817 1045">-1</td> <td data-bbox="817 1013 1019 1045">0</td> <td data-bbox="1019 1013 1220 1045">+1</td> <td data-bbox="1220 1013 2105 1045">+2</td> </tr> <tr> <td data-bbox="302 1045 571 1173">No, we do not meet this requirement</td> <td data-bbox="571 1045 817 1173">No, we may not fully meet this requirement</td> <td data-bbox="817 1045 1019 1173">Unclear whether our plan meets this requirement or not</td> <td data-bbox="1019 1045 1220 1173">Yes, we are likely to meet this requirement</td> <td data-bbox="1220 1045 2105 1173">Yes, we are confident our plan will meet this requirement</td> </tr> </table> <p>Reason for score: The objectives of the draft Shropshire Local Plan are clearly and coherently presented. The Spatial Vision is clearly documented within the introduction to the draft Shropshire Local Plan and the overarching objectives are documented within draft Policy SP1. The wider draft strategic policies then provide further detail on the strategy for the area.</p> <p>Implications of taking no further action: n/a</p> <p>Mitigation / Action required (if necessary) to move scale to right: n/a</p>	-2	-1	0	+1	+2	No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
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		<p>Reviewer Comments: Whilst the local plan is to be read as a whole document, it is set out in a structured framework of three main parts to assist with decision making. The strategic policies set out the overall scale and pattern of development for the County to 2038. The Development Management policies provide more detail on specific topics to guide decision making for specific proposals and the settlement policies highlight particular local housing and employment requirements alongside site allocations. Policies are succinct and clearly written. Any terminology used is consistent with national policy. Where policies cross reference one another it has been clearly identified.</p>				
<p>45.</p>	<p>For each policy area you have designated or defined in the Plan: (i) are these clearly referenced and explained in the Plan; and (ii) clearly defined on the Policies Map?</p> <p>Where you have included maps or graphics within the local plan policies update are these legible and is it clear if and how they are to be used in decision making?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: Both national and local designations are reference in the plan where relevant to a policy and in instances where there is a specific designation such as a site allocation, these are identified with their own dedicated policy which sets out the objectives of the plan. These designations are defined on policies maps. Individual policy maps are provided for any settlements identified for particular development and a map of the whole county giving a strategic overview of the national and local designations is provided. Maps are clearly labelled and accompanied with a key. Alongside the individual policy maps there is also an interactive iGIS map available to enable detailed search of a site. Any site-specific policy designations such as site allocations cross reference to the precise policy in the plan. Where maps and tables which have been included directly into the body of the local plan, these are directly associated with the policy for which they relate and are clearly referenced.</p>				
		<p>Implications of taking no further action: N/A</p>				
<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>						
<p>Reviewer Comments: Both national and local designations are reference in the plan where relevant to a policy. These designations, including the location of site allocation are defined on policies maps. Individual policy maps are provided for any settlements identified for particular development and a map of the whole county giving a strategic overview of the national and local designations is provided. Maps are clearly labelled and accompanied with a key. Where maps and tables which have been included directly into the body of the local plan, these are directly associated with the policy for which they relate and are clearly referenced.</p>						
<p>46.</p>	<p>Does each local plan policies update policy: (i) make clear the type of development it will promote; (ii) use positive rather than negative wording?</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
<p>Reason for score: The plan policies are worded to be positive and provide certainty to decision makers, communities and developers. The policy document is set within a hierarchy beginning with strategic policy</p>						

		<p>before focusing into development themes/location specific matters. Each policy is named and gives an indication of the type of development it relates to. They are written in a broadly consistent manner with the main objectives of each policy set out. Where necessary more detailed guidance is given on how it is expected development will achieve the objectives.</p>											
		<p>Implications of taking no further action: N/A</p>											
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p>											
		<p>Reviewer Comments: The policy document is set within a hierarchy beginning with strategic policy before focusing into development themes/location specific matters. Each policy is named and gives an indication of the type of development it relates to. They are written in a broadly consistent manner with the main objectives of each policy set out and then where necessary more detailed guidance is given on how it is expected development will achieve the objectives. The plan policies are worded to be positive and provide certainty to decision makers, communities and developers.</p>											
<p>47.</p>	<p>Do policies make clear where they are intended to be applied differently for the purposes of decision-making dependent on (i) scale; (ii) use; or (iii) location of development proposed.</p> <p>[Note: If you have said ‘all development’ this implies equal application irrespective of the development scale/use/location and this may not be either justified or deliverable]</p>	<p>-2</p>	<p>-1</p>	<p>0</p>	<p>+1</p>	<p>+2</p>							
		<p>No, we do not meet this requirement</p>	<p>No, we may not fully meet this requirement</p>	<p>Unclear whether our plan meets this requirement or not</p>	<p>Yes, we are likely to meet this requirement</p>	<p>Yes, we are confident our plan will meet this requirement</p>							
		<p>Reason for score: There are some plan policy objectives which only apply to certain types of development. Where this is the case the plan policies clearly define any thresholds and trigger points which apply. These help to assist decision makers, communities and developers understand when particular requirements of a policy will apply due to development types, scale, uses and location.</p>											
		<p>Implications of taking no further action: N/A</p>											
		<p>Mitigation / Action required (if necessary) to move scale to right: N/a</p>											
		<p>Reviewer Comments: Where the plan policies seek to be applied differently for the purposes of decision making the thresholds and trigger points which will apply are clearly defined within the relevant plan policy.</p>											
<p>I</p>	<p>State how many policies are in your local plan update?</p> <p>Can you list any policies within the local plan update that: (i) repeat parts of other policies within the plan; (ii) replicate or repeat paragraphs in the NPPF (iii) cross reference other policies.</p>	<p>There are 71 policies in the local plan update and are divided into three sections as follows: 17 Strategic; 33 Development Management; 21 Settlement/Strategic Site Policies. Those policies which repeat part of other policies, replicate or repeat paragraphs in the NPPF and/or cross-reference other policies are listed below:</p>											
		<table border="1"> <thead> <tr> <th>Policy</th> <th>(i)Repeats other Plan policies</th> <th>(ii) Policy replicates NPPF</th> <th>(iii) Cross references other policies</th> </tr> </thead> <tbody> <tr> <td>SP1</td> <td>No. This policy identifies the strategic objectives for the draft Shropshire Local Plan. It therefore links to and is referenced by subsequent policies,</td> <td>No</td> <td>No</td> </tr> </tbody> </table>	Policy	(i)Repeats other Plan policies	(ii) Policy replicates NPPF	(iii) Cross references other policies	SP1	No. This policy identifies the strategic objectives for the draft Shropshire Local Plan. It therefore links to and is referenced by subsequent policies,	No	No			
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SP1	No. This policy identifies the strategic objectives for the draft Shropshire Local Plan. It therefore links to and is referenced by subsequent policies,	No	No										

			but is not considered to repeat/duplicate them.		
		SP2	No. This policy identifies the strategic approach. It therefore links to and is referenced by subsequent policies, but is not considered to repeat/duplicate them.	No	This policy identifies the strategic approach. It therefore links to and is referenced by subsequent policies, but is not considered to repeat/duplicate them.
		SP3	No	No	Yes. Appropriate cross-referencing to those draft strategic and development management policies which support and/or provide greater detail on issues within this strategic policy.
		SP4	No	Yes. However, it is considered that this policy positively links and provides local context on the presumption in favour of sustainable development.	No
		SP5	No. High-quality design is inevitably a theme running through the draft Shropshire Local Plan. However, it is not considered that draft policies repeat/duplicate each other, but are rather complementary on this matter. SP5 provides a strategic overview, whilst subsequent policies provide geographic/thematic/location specific context.	There is inevitably themes in this policy that are also within national policy. However, this draft Policy is very much about achieving high-quality design in Shropshire. It is therefore considered complementary rather than a duplication of the NPPF. It does not repeat specific elements of the NPPF.	Yes. Appropriate cross-referencing to those draft Policies which provide greater detail on issues within this strategic policy.

		SP6	No	No	Yes. Appropriate cross-referencing to those draft strategic and development management policies which support and/or provide greater detail on issues within this strategic policy.
		SP7	No.	No	Yes. Cross referencing Policies S1-20 and SP10 appropriate & required to enable SP7 to provide a mechanism for managing housing development to be used in conjunction with settlement policies S1-20
		SP8	This draft Policy aligns with the proposed strategic approach. However, it is not considered that it repeats/duplicates it, rather it provides a policy specific for one element of the hierarchy identified within the strategic approach (proposed Community Hubs). It also provides geographic specific detail on thematic issues, but again this is considered complementary rather than repetition/duplication.	No. Aligns with rather than repeats NPPF.	Yes. Appropriate cross-referencing to those draft Policies which provide greater detail on issues within this strategic policy.
		SP9	This draft Policy aligns with the proposed strategic approach. However, it is not considered that it repeats/duplicates it, rather it provides a policy specific for one element of the hierarchy identified within the strategic approach (proposed Community Hubs). It also provides geographic specific detail on thematic issues, but again	No. Aligns with rather than repeats NPPF.	Yes. Appropriate cross-referencing to those draft Policies which provide greater detail on issues within this strategic policy.

		this is considered complementary rather than repetition/duplication.		
SP10	No		No	Yes to highlight other requirements /avoid repetition
SP11	No		References national policy and uses NPPF terminology but provides Shropshire context and requirements in alignment with NPPF rather than repeating it.	Yes to highlight other requirements /avoid repetition
SP12	No		No	Yes to highlight other requirements /avoid repetition
SP13	No		No	Yes to highlight other requirements /avoid repetition
SP14	No		No	Yes to highlight other requirements /avoid repetition
SP16	No		No	Yes to highlight other requirements /avoid repetition
SP17	No		No	Yes to highlight other requirements /avoid repetition
DP2	No		No	Yes to highlight other requirements /avoid repetition
DP3	No		No	Yes to highlight other requirements /avoid repetition
DP4	No		No	Yes to highlight other requirements /avoid repetition
DP5	No		No	Yes to highlight other requirements /avoid repetition

		DP6	No	No	Yes to highlight other requirements /avoid repetition
		DP7	No	No	Yes to highlight other requirements /avoid repetition
		DP8	No	No	Yes to highlight other requirements /avoid repetition
		DP9	No	No	Yes to highlight other requirements /avoid repetition
		DP10	No	Yes – DP10.10 refers to para 79 in the NPPF (updated in 2021 to para 80) relating to exceptional design in the countryside.	Yes to highlight other requirements /avoid repetition
		DP11	No	No	Yes, avoids repetition by cross referencing another strategic policy which sets the framework for this policy
		DP12	No	No: references NPPF requirements for SSSIs, Ancient Woodland and Veteran Trees but does not repeat text of NPPF	Yes: avoids repetition by cross referencing other development management policies which either contain complementary requirements or support this policy's requirements
		DP13	No	No	Yes, avoids repetition by cross referencing another development management policy which contains complementary requirements.
		DP14	No	No	Yes, avoids repetition by cross referencing other strategic and

					development management policies which either contain complementary requirements or support this policy's requirements.
		DP15	No	No	Yes, avoids repetition by cross referencing other development management policies which either contain complementary requirements or support this policy's requirements.
		DP16	No	No	Yes, avoids repetition by cross referencing other development management policies which either contain complementary requirements or support this policy's requirements.
		DP17	No	No	Yes, avoids repetition by cross referencing another development management policy which contains complementary requirements.
		DP18	No	No	Yes, avoids repetition by cross referencing other development management policies which either contain complementary requirements or support this policy's requirements.
		DP19	No	No	Yes, avoids repetition by cross referencing other development management policies

					which either contain complementary requirements or support this policy's requirements.
		DP20	No	No	Yes, avoids repetition by cross referencing another strategic policy which sets the framework for this policy
		DP21	No	Yes. Repeats parts of NPPF to provide clarity and guidance on flood risk requirements for development proposals. NPPF flood risk requirements are contained in several paragraphs and footnotes which can be difficult to follow. Similarly, there is a large amount of guidance in NPPG but again, it can be difficult to discern the best course of action. Feedback from the Council's Development Management team suggests that applicants are not meeting national policy or following national guidance for many proposals. This policy synthesises both to provide a clear and logical structure to support applicants to meet national policy requirements	Yes, avoids repetition by cross referencing other strategic and development management policies which either contain complementary requirements or support this policy's requirements.

		DP22	No	No: Paragraph 3 follows the drainage hierarchy set out in NPPG but the policy does not repeat text of NPPF.	Yes, avoids repetition by cross referencing another development management policy which contains complementary requirements.
		DP23	No	No: references NPPF requirements for designated heritage assets but does not repeat text of NPPF.	No
		DP24	No	Yes. Repeats parts of NPPF to provide clarity and guidance on requirements to protect the Shropshire Hills AONB. Feedback from the Shropshire Hills AONB Partnership suggests that applicants are not meeting national policy or following national guidance for many proposals. This policy provides a clear and logical structure to support applicants to meet these requirements.	Yes, avoids repetition by cross referencing other strategic and development management policies which either contain complementary requirements or support this policy's requirements.
		DP26	No	No	Yes, avoids repetition by cross referencing other strategic and development management policies which either contain complementary requirements or support this policy's requirements.

		DP29	No	No	Yes to highlight other requirements /avoid repetition	
		DP30	No	No	Yes to highlight other requirements /avoid repetition	
		DP31	No	No	Yes to highlight other requirements /avoid repetition	
		DP32	No	No	Yes to highlight other requirements /avoid repetition	
		DP33	No	No	Yes to highlight other requirements /avoid repetition	
		S1 through to S21	Draft Settlement/strategic site Policies S1-21 align with the proposed strategic approach. However, it is not considered that these policies repeat/duplicate it, rather they expand on this proposed strategic approach for a defined geography. Each settlement/strategic site policy also provides geographic/site specific detail on thematic issues, but again this is considered complementary rather than repetition/duplication.		No.	Yes. Appropriate cross-referencing to those draft Policies which provide greater detail on issues within this draft Policy.
48.	<p>Based on the above, have you tried to avoid unnecessary repetition (of the NPPF or other policies within the local plan policies update) and cross referencing in policies?</p> <p>If you find duplication or repetition you may want to take minute to consider whether this is appropriate.</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: There are inevitably some themes running through the draft plan policies which can be found within the NPPF and other local plan policies in the draft plan. However, the draft local plan policies seek to be complementary rather than a duplication and provides geographic/locational specific detail in order to support the policy documents overarching aims of achieving sustainable development and</p>				

	addressing the spatial vision for the County. There is some cross referencing, although it is kept to a minimum where greater detail is required on issues within the draft policy.												
	Implications of taking no further action: N/A												
	Mitigation / Action required (if necessary) to move scale to right: N/A												
	Reviewer Comments: Some themes run through the draft plan policies which can be found within the NPPF and within other local plan policies. The draft local plan policies seek to be complementary rather than a duplication and provides geographic/locational specific details.												
49.	Do policies avoid duplicating other regulatory requirements (for example, building regulations)?	-2	-1	0	+1	+2							
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement							
		Reason for score: The draft local plan policies seek to avoid duplication of other regulatory requirements. One policy (DP27) duplicates building regulations standards for broadband and telecommunications. However the policy considered to exceed the standards and is consistent with the Councils Connecting Shropshire Strategy 2016-2020 and the £5bn UK 'Project Gigabit'. Policies SP5, DP1, DP11, DP12, DP18 and DP20 do refer to other regulatory requirements. In these cases the reasons are for consistency and clarity and the policy is careful to not repeat or duplicate the exact requirements of the other regulatory requirements. Policy DP1 introduces the optional technical building regulations where national policy allows for their introduction through the Local Plan based on proportionate and robust evidence.											
		Implications of taking no further action: N/A											
		Mitigation / Action required (if necessary) to move scale to right: N/A											
		Reviewer Comments: The draft local plan policies seek to avoid duplication of other regulatory requirements. Those policies where there has been reference to other regulatory requirements are set out in the table below:											
		<table border="1"> <thead> <tr> <th>Policy</th> <th>Duplication</th> <th>Justification</th> </tr> </thead> <tbody> <tr> <td>SP5</td> <td>No</td> <td>Complementary to building regulations and other design related policy and guidance.</td> </tr> <tr> <td>DP1</td> <td>No</td> <td>The policy introduces optional technical Building Regulation standards. This is consistent with national policy which stipulates that Local Planning Authorities can, through the Local Plan, introduce such standards in response/supported by to proportionate and robust evidence.</td> </tr> </tbody> </table>					Policy	Duplication	Justification	SP5	No	Complementary to building regulations and other design related policy and guidance.	DP1
Policy	Duplication	Justification											
SP5	No	Complementary to building regulations and other design related policy and guidance.											
DP1	No	The policy introduces optional technical Building Regulation standards. This is consistent with national policy which stipulates that Local Planning Authorities can, through the Local Plan, introduce such standards in response/supported by to proportionate and robust evidence.											

		DP11	No	The policy exceeds Building Regulation standards. This is consistent with national guidance (NPPG Climate Change section: Can a local planning authority set higher energy performance standards than the building regulations in their local plan? Paragraph 012 Reference ID: 6-012-20190315.		
		DP12	No	Paragraph 1 of the policy reflects the provisions of the Habitats Regulations to provide certainty that development will not contravene this legislation and clarity for applicants as to the approach the Council will take to proposals affecting internationally designated sites. Paragraph 3 of the policy references the Environment Act. This was not in force at the time of Plan preparation but is likely to be enacted very early on in the Plan period, if not before.		
		DP18	No	The policy references existing pollution control regimes and national objectives for pollutants but does not include their requirements.		
		DP20	No	The policy exceeds Building Regulation standards for water consumption. This is consistent with the Water Cycle Study recommendation in table 4.12.		
		DP27	Yes	Policy exceeds Building Regulation standards for broadband and telecommunications connections but is consistent with the Council's Connecting Shropshire Strategy 2016 - 2020 and the £5bn UK 'Project Gigabit' to provide faster, reliable broadband into areas in the UK where commercial viability currently restricts investment by broadband infrastructure suppliers		
50.	<p>Does the wording of plan policies avoid ambiguity? Are requirements clear to the decision-maker?</p> <p>[For instance, policies should avoid using overly subjective terms such as "to the Council's satisfaction", "considered necessary by the Council" or "appropriate" without associated clarification.]</p>	-2	-1	0	+1	+2
		No, we do not meet this requirement	No, we may not fully meet this requirement	Unclear whether our plan meets this requirement or not	Yes, we are likely to meet this requirement	Yes, we are confident our plan will meet this requirement
		<p>Reason for score: The plan policies are set out in a succinct manner and clearly set out the requirements which should be met for a development to be plan compliant. Where a policy requires a particular aspect to be addressed for the development to achieve the plan objective what is expected is set out in the policy in a clear and precise manner.</p>				
		<p>Implications of taking no further action: N/A</p>				
		<p>Mitigation / Action required (if necessary) to move scale to right: N/A</p> <p>Reviewer Comments: The plan policies have been drafted with some early input from Development Management and reflect feedback from statutory consultees and third-party responses. Where a policy requires a particular aspect to be addressed for the development to achieve the plan objective, what is expected is set out in the policy in a clear and precise manner.</p>				