



*Our plan –
Our future*

Appendix 7 – Statutory Agency Comments

Much Wenlock Neighbourhood Development Plan – Table of Statutory Agency comments and responses					
Policy Number/ Reference	Evidence Ref No	Name of contributor	Comments	Suggested changes to the Draft NP	Response by MWNPSG 8th and 15th April 2013
Introduction	STAT 1	DCLG	<p>We need more about setting the context for the Plan. We need to:</p> <ul style="list-style-type: none"> • Think about having a clear locally distinctive vision Refer to adopted SPDs to set the context and justify policies • Provide greater explanation of the overall development strategy for MW as per the CS. This is especially important for the housing nos. • The approved area needs identifying • State that policies should not be read in isolation • Explain green leaf 	Review	<p>Revised intro has been drafted to make it more technical.</p> <p>All references to Core Strategy and SPDs plus other relevant local documents complete. List of policy refs sent to SC (Andy Mortimer) for checking 2nd April 2013.</p>
Introduction	STAT 3	SC	<p>The Plan would benefit from explanation of how it is to be delivered as it does not stand alone and in this respect cross references to the Much Wenlock Place Plan would be very useful. Similarly some clarification of monitoring of certain requirements unique to this Plan would be helpful to show how the Plan is working, what success looks like, or why it</p>	Review	<p>References to Place Plan as appropriate.</p> <p>References to monitoring employment and housing policies.</p>

			may need to be reviewed in the future and what potential triggers might be.		Referred to triggers for review. Benchmarks for success identified/referenced.
Introduction	STAT 2	Healthcheck	It is suggested, that the identification of the approved area together with the general background , could be explained in an expanded introductory section to the MWNP. This does not need to be extensive but would assist in setting the context for the Plan.	Review	Revised introduction
Overall	STAT 2	Healthcheck	Need more specific references to the NPPF and consider setting out core strategy policies in full	Do not reproduce the Core Strategies in full, but list them.	CS strategies listed under each objective
General	STAT 2	Healthcheck	<p>The pre-submission MWNP, as presented on the web site, sets out a series of 9 Objectives which reflect the issues raised during the previous public consultation and engagement exercise.</p> <p>The rationale for each of the Objectives is considered to be clear and well set out in plain English. The Objectives are then reflected in a series of specific policies. Most of these are again clear and entirely appropriate given the context of each Objective.</p> <p>In terms of cross reference to relevant adopted Core Strategies and reference to salient sections of the NPPF, this appears to be fair but not consistent. Some Objectives are fully referenced but there are some anomalies where specific CS policies seem to have little relation to the issue at hand and where reference to the NPPF is broad and a more specific reference would support the Objectives better.</p> <p>Additional reference to SPD, would also assist in setting the context and hence some justification for the policies</p>	Review	Rigorous re-check of relevant CS policies and NPPF. Plan amended. Additional refs to SPDs

			proposed The plans attached to the draft NP are clear and well annotated and the respondent's form is again, clear and well presented.		
Overall	STAT 1	DCLG	Take out 'normally' throughout	We were advised to include this phrase. Now removed from 3 policies.	Have removed references
Check out overlaps	STAT 3	SC	It is not always apparent to the reader what the Plan is adding to the existing policy framework of the NPPF and the Core Strategy and there are several instances where it simply repeats in different words the existing policy. Editing and policy sifting will I am sure eliminate some of this overlap.	Re-check	Deleted policies 1.2/2.5/6.3/8.2. Other policies are similar to CS but add local weight to their strategic direction
CIL	STAT 1	DCLG	Consider providing a priority list for CIL. If this is not feasible then as a minimum a delivery/infrastructure plan should be produced to provide reassurances that the policies and proposals are deliverable	This advice conflicts with Place Plan	Have included references to Place Plan.
Site allocation	STAT 1	DCLG	RES1 and EMP 1 we need to assess sites for viability and deliverability and whilst they could be in separate documents the plan needs a brief summary	Write up assessments	Available as background evidence/appendix
Sustainability	STAT 1	DCLG	Demonstrate that work has been done in assessing sustainability effects of policies – if this is in a different doc we need a cross reference	Review against Shropshire Council's Draft Sustainability Appraisal Scoping Report (July 2008)	Have added an explanation in the intro. Policies re-appraised against SC's Draft Sustainability Appraisal Scoping Report from July 2008 which provides a series of objectives which gives us a structure for this.
Sustainability	STAT	Healthcheck	The draft MWNP currently includes a 'green leaf'	Review	Suggestions accepted.

	2		<p>designation which is assigned to specific summaries at the conclusion of each Objective. This is considered to be a very helpful summary of the issues addressed and highlights how the policies specifically contribute to achieving sustainable development.</p> <p>While this is considered good and positive practice, it would be helpful if the NP explained this designation more clearly so it is obvious to any new reader of the NP or a lay person who is not informed of the overall process.</p> <p>No detailed Sustainability Statement has been presented to date. It is suggested that this or a fuller analysis of sustainability issues should be included within the formal submission.</p>		Decision on need for SA awaited
SEA	STAT 3	SC	<p>Although the Plan does not propose large amounts of new housing or employment land I would raise again that the MWNP would benefit considerably from a Sustainability Appraisal which would include an SEA. This would also help to demonstrate how the Plan has developed and added value to the existing policy framework.</p>	SEA – await JB’s comments to Mike’s email 2/4/13	No response 13/4/13
SEA	STAT 3a	SC	<p>In terms of the SA however, the use of the green leaves throughout the plan is indeed a nice touch that is helpful to the reader giving a general indication of intent behind the objectives and policies. What we are looking for however is a stand-alone assessment of how these have been arrived At and evaluated in terms of alternatives which might contribute more or less to sustainability. Advice on plan making is that the SA should be something that is recorded throughout the plan making process to evidence the decision making journey as well as the plan itself. The SA, as with that which accompanied our Core Strategy is a</p>	Review against Shropshire Council’s Draft Sustainability Appraisal Scoping Report (July 2008)	Policies re-appraised against SC’s Draft Sustainability Appraisal Scoping Report from July 2008 which provides a series of objectives which gives us a structure for this.

			background paper which as I say I think you reflect well in the plan. The SA has of course to be proportionate to the Plan itself but with 47 policies compared to the 20 in the Core Strategy it will have some ground to cover.		
Viability etc	STAT 3	SC	On careful reading it is clear that there are a number of areas of potential discord with the NPPF that need further consideration. In particular the Plan introduces a number of tests around viability, community value, recognised need, design briefs, as well as requirements for Code level 4 and 5 for new homes which could well prove not to be justified initially or sustainable in practice. It is unclear whether these contribute to the delivery of the Plan and should be considered alongside the requirements of NPPF paras 173 to 177.		Viability tests set out. MWNPSG considered NPPF paras 173-177 on 8 th April 13. No change required
Supporting evidence	STAT 3	SC	Although the tests for the Plan are different than having the Core Strategy found Sound, as it will subsequently be relied up for development management purposes some of the policies require further justification through robust evidence other than community views. Whilst some of this supporting evidence may already exist through Shropshire Council's Local Plan evidence base some of the requirements particular to the MWNP may which would risk such policies not being sufficiently robust to stand up to scrutiny by developers and Planning Inspectors reviewing future decisions based on the Plan.	SC then identifies where these issues are so see individual policy comments	Evidence base assembled and referenced.
Objective 1 Housing	STAT 1	DCLG	Justification: Need much greater reference to the Core Strategy. Additionally we need: <ul style="list-style-type: none"> • Greater clarification as whether specific sites are allocated • Need reference to Core Strategy housing nos. 	Review	Made reference to allocation. CS referenced. Background evidence prepared

			<ul style="list-style-type: none"> • 25 houses reference is confusing – is that all the devt planned? Helpful to provide detail of split between site allocations/ windfall/ small sites • Use numerical references such as ‘the plan will provide X new dwellings over the plan period’ 		
Objective 1	STAT 2	Healthcheck	More extensive CS housing policies should be included	Noted	More extensive refs made
Objective 21Housing	STAT 3a	SC	Just to be clear you will note that our comments do NOT raise a conformity issue re housing numbers, or indeed any other matters, albeit we suggest areas for adjustment and reconsideration.	Noted	
Policy 1.1	STAT 1	DCLG	Define local connection The policy reads as through the site RES1 is suitable but not allocated	Refer to SC local connection definition	Referred to SC local connection definition. Clarity re allocation in revised text
Policy 1.1	STAT 3	SC	It is not immediately clear how this policy relates to established policy in the Type and Affordability of Housing SPD where various definitions and explanations are already set out. There is no obvious conflict but at the very least a cross reference should be made and consideration should be given as to whether this policy adds anything to the current policy framework. This will avoid undue confusion by both developers and decision makers. For example: What is meant by “on the edge of the development boundary”? What is the justification for limiting exceptions to less than 10 houses in the face of the Council’s policy position of up to 20?	Review	SPD referenced. Edge of development boundary wording revised. Exceptions limited to fewer than 10 houses because for purposes of CS we do not fall in to settlements with pop. of >3000
Policy 1.2 /1.3	STAT 1	DCLG	Give policy justification on level of local need we aim to meet.	Provide evidence	Evidence available

Policy 1.2	STAT 3	SC	If new open market housing is to be allowed in the other settlements in the Parish they need to be identified as Hubs or Clusters in the emerging SAMDev plan, so far this has not been the case	Review	Original 1.2 duplicated CS and now deleted.
Housing	STAT 1	DCLG	Housing needs to be closely monitored and if there is an expectation of X houses every 5 years we need to say whether other land will be released for development. Thame identified 'reserve sites'	There will be a phrase in new housing section to say that we will work with SC to bring exceptions forward and monitor windfalls. Something around this also now in intro	Revised as per comment
1.4	STAT 3	SC	<p>Shropshire Council would favour delivery of more housing on the identified site to enable delivery of greater numbers of affordable housing and greater CIL and developer contributions in order to deliver significant support for community infrastructure in general and flood alleviation measures in particular.</p> <p>It is disappointing that the MWNP has sought to deliver less than expected for the role of a market town as set out in Core Strategy policy CS3. Other similar sized market towns and key centres are seeking higher levels of housing provision in order to meet local needs and help deliver identified community infrastructure requirements. This is very pertinent at this time as the land supply in Shropshire has fallen below the 5 years required by the NPPF which means a potential relocation of numbers throughout Shropshire via the SAMDev adoption process.</p> <p>My Conservation colleagues advise that there are no wildlife designations on or adjacent to this land. From aerial photos it appears to consist of arable land surrounded by a newly planted tree screen, bordered by hedgerows. This site</p>	Noted – our policies are in conformity	No change

			appears to have relatively low biodiversity value, with the possible exception of the hedges.		
Policy 1.5	STAT 1	DCLG	Needs more clarity – delivered or funded. Is there a threshold ie do single plots contribute? Does this add value to the CS? Is it needed?	Revise	Reworded delivered and funded
Policy 1.5	STAT 3	SC	Although the aim of seeking more affordable housing is welcomed, currently this policy is not in conformity with the existing approach through the Core Strategy and SPD and will no doubt be scrutinised by developers. Evidence justifying this higher rate needs to be provided for this policy to be accepted, alternatively, our future policy review may well provide evidence for a more nuanced approach leading to a different rate applying in the town but we are not there yet.	Evidence base needed	Evidence base provided. SC confirm that affordable ratio likely to increase.
Policy 1.5	STAT 3a	SC	In terms of the 20% affordable housing, the difficulty is that we do have work that points us in this general direction but we have not reached any final conclusions and when our work is concluded the evidence could point to 19% or 21% or some other figure so the problem here on relying on our work is a matter of timing rather than principle.	Justification revised to reflect latest housing figs	Revised justification policy remains
1.6	STAT 3	SC	Again, whilst supported in principle this policy requires a robust evidence base to justify why new housing should focus on 2 and 3 bed homes and older persons housing. It may well be that your evidence base has captured this but it needs to be shown and available for testing by potential developers.	Refer to Census	Revised justification prepared and evidence provided in evidence base
1.7	STAT 1	DCLG	What will be the criteria, eg vacant for more than 12 months etc?	Review	Viability tests set out in Appendix

1.7	STAT 3	SC	This policy needs to explain or cross-refer to the criteria used to determine whether employment use is no longer viable.	Review	Viability tests set out in Appendix
Economy	STAT 3	SC	<p>There are unfortunately some instances of conflict or lack of conformity with the Core Strategy particularly around economic development in the countryside and the attempted restriction to B1 uses under Objective 2. The Council of course has both a land owning interest here but also practical experience regarding viability and deliverability.</p> <p><u>Objective 2 The Economy and Jobs</u> Our general concern is that although Much Wenlock is a key centre within the Core Strategy the Plan appears to neglect its service centre role especially its role in supporting settlements in Corvedale and Wenlock Edge in favour of an inward focus on Much Wenlock itself.</p>	Review	Restrictions removed. References made to MW's role as a Key Centre
2.1	STAT 1	DCLG	<ul style="list-style-type: none"> • Who will prepare the design brief is it the developer? Will it be a guide or master plan? • Make clear that EMP 1 is an allocation • The site should also be appraised in order to demonstrate why it is considered suitable for development. • Need evidence that uses are deliverable and viable • Need more guidance as to what is appropriate in terms of scale, appearance parking and impact. 	Review	Revised policy text to take on board comments. Evidence base prepared as to viability and deliverability. SC is landowner and committed to bringing forward
2.1	STAT 3	SC	This policy seems to be a little restrictive. It seeks to restrict EMP1 and other potential sites to B1 use only with no evidence supplied to justify this. This is potentially in conflict	Review	Policy revised to include B2 and B8. Clarity re design brief

			<p>with the Core Strategy approach in CS14 and NPPF (para 28). The site should include small scale B2 and B8 uses as well and indeed I would offer that without a broader consideration the site may not prove to either be marketable or developable. It is our experience that considerable public support tends to be required for delivering such opportunities and again the plan should identify deliverability.</p> <p>It is also unclear who is expected to prepare the “design brief”?</p> <p>My conservation colleagues advise that this site lies immediately adjacent to an arm of the Environmental Network and care would be needed to ensure there are no adverse effects on the Network (including through lighting) and that landscaping should enhance the network where possible (see CS17). Any development on greenfield parts of this site would need an Ecological Assessment. From aerial photos this site does not appear to have high biodiversity value, other than hedges, but an ecological survey would be needed to be sure.</p>		<p>added. Reference to need for Ecological assessment added.</p>
2.1	STAT 2	Healthcheck	<p>Makes reference to ‘design brief’ but no indication given as to who would prepare this;.</p> <p>More relevant CS policies need to be identified to support this Objective and similarly it is suggested that the relevant elements of NPPF should be presented, i.e. paras 29 to 41.</p>	<p>Review but decision made not to quote NPPF</p>	<p>Policy revised. CS policies reviewed for completeness</p>
2.2	STAT 1	DCLG	<p>The Policy identifies that existing employment sites will be retained ‘for that purpose.’ It would be helpful if ‘that purpose’ could be linked to specific employment uses for example should the site only be retained for traditional B uses or could employment generating uses also be</p>	<p>Suggest we delete ‘for that purpose’</p>	<p>Policy revised</p>

			considered e.g. training centres and crèches? As discussed previously it would provide greater clarity if criteria were included which will be used to determine a site's viability.		
2.2	STAT 3	SC	Is not clear what "for that purpose" means, is it a specific use or a general category of employment and would this include provision of services such as nurseries or quasi-retail such as car sales or trade counters? Who decides, and what are the criteria for, "well located" and "well suited to employment use"? The Plan also needs to establish definition of or criteria for 'viability' and for "equal or greater benefits for the local community".	See above	Policy revised Definition of viability added as an appendix
2.3	STAT 3	SC	Does this policy support additional retail floorspace anywhere in Much Wenlock? It should probably clarify support the existing shopping area before additional provision away from High Street. I think that this is what you had anticipated.	Provide greater clarity	Policy re-worded
policy 2.3	STAT 2	Healthcheck	Suggests that normal market competition would be overridden. This might need to be the subject of a legal view.	Review	Policy broadly in line with CS to protect local facilities, no change
2.4	STAT 1	DCLG	How will viability be assessed?	Review	Definition of viability added as an appendix
2.4	STAT 3	SC	Again there is a need to establish a definition of or criteria for 'viability' and for "equal or greater benefits for the local economy and community". This policy may now also be inconsistent with national government plans to allow change from retail to residential use without planning permission.	Review	Definition of viability added as an appendix

2.6	STAT 4	Natural England	Your plan area is within or adjacent to the Shropshire Hill Area of Outstanding Natural Beauty (AONB). We are pleased to see that you have acknowledged the proximity of the AONB (Policy 2.6 refers) and we encourage the Town Council to take account of the relevant AONB Management Plan for the area. For Areas of Outstanding Natural Beauty, you should also seek the views of the AONB Partnership.	No change	No change
2.7	STAT 3	SC	Policy 2.7 I am afraid that I consider this policy to be too restrictive and not in conformity with Core Strategy policies CS3, CS5 and CS14 which do not place a use class restriction on economic development in Market Towns or open countryside. Policy CS5 refers to “ <i>small scale</i> economic development”. You may also wish to take a view of how it sits with the thrust of the NPPF.	Advice taken	Policy deleted
Policy 2.8	STAT 3	SC	The idea behind this policy is understood but I need to be clear that tranquillity is not a criteria usually applied to settlements themselves where you are planning for growth and prosperity. It sits better with those parts of the countryside where change is minimal. I suggest that some rethinking of approach may be helpful.	Review	Reference to tranquillity in policy removed. Kept in justification. Appears in line with CS.
Objective 3	STAT 3	SC	General comment about use of terms: “rainfall catchment area”; “flood sensitive areas”; “flood attenuation areas”; these need to be defined and clearly shown on a map base.		Shown on map
3.	STAT	Environment	Concern over reference to ‘supporting the use and/or	Remove reference	Agree to removal of the

	5	Agency, Mark Davies	enlargement of containment ponds...' A policy line could also be added, in Policy 3, to state “Development will not result in the loss of open watercourse, and culverts should be opened up where possible to improve drainage and flood flows. Proposals involving the creation of new culverts (unless essential to the provision of access) will not normally be permitted”.	Add wording	tick reference as too narrowly defined a solution. Agree to add wording as suggested.
3.1	STAT2	Healthcheck	This policy could be challenged as it restricts devt till IUDMP.	Strong views that this must be retained	No change other than to date.
3.1	STAT3	SC	Similarly the approach in policy 3.1 to restrict development until the IUDMP is completed will I think prove problematic in practice. Policy 3.1 This amounts to a moratorium on new development in a large area which actually extends outside the Parish. This is not in conformity with Core Strategy policy CS3 or CS5. It is unlikely that the policy would stand up at appeal if used as a reason for refusal. The reason for this policy is not clear when policies 3.2 and 3.3 set out the requirements for new development. We would for the reasons set out above struggle to accept the policy as the basis for decision making.	Strong views that this must be retained	No change other than to date.
3.2	STAT3	SC	Does this policy mean “ all developments”? If so how can it be enforced, and if it can’t then the policy should not be used? The Plan also needs to define what is meant by “green spaces”. I would draw your attention to what I think is a potential conflict with NPPF paras 102 and 104 for minor development and changes of use.	Review	Green spaces deleted. Otherwise no change
3.3	STAT5	Environment Agency,	Suggestion to maximize the separation of foul and surface water.	Incorporate into Policy	Agree if not already clear that expected of the Plan

		Mark Davies			by strategic policy.
3.3	STAT3	SC	<p>What is meant by “significant new development” and how does this differ from “any development” (policy 3.1) or “all developments” (policy 3.2)?</p> <p>What is meant by “excess water” and what is meant by “away from the town”? This might be achieved but with other consequences or by inappropriate means and needs a little more thinking through if the Plan is to be clear and deliverable.</p>	Review	Policy deleted – will deal in connection with design brief for RES1.
3.4	STAT5	Environment Agency, Mark Davies	We support the use of a high level of water efficiency as proposed in Policy 3.4. This will secure a minimum requirement of 80 l/p/day for all new dwellings. This measure will help to minimise loading to the existing combined sewerage system. It will also contribute to wider climate change reduction/sustainability. This issue is supported by the WCS evidence base (water efficiency recommendations).	Retain 80l/p/day	Agreed, keep in Plan.
Policy 3.4	STAT3	SC	This is an admirable but perhaps a little incongruous as a policy and the plan needs to distinguish between flood risk and water resource issues. What evidence is in place to justify this extra criterion to the development industry when they question it? It would not be sensible to set the Plan up for a conflict.	Strong support of EA	Deleted ref to DCLG Level 5 code in policy itself
3.5	STAT3	SC	The “flood attenuation areas” need to be shown on a map base and explanation of their criteria and designation set out clearly in the supporting text.		They are on the map
4	STAT4	Natural England	Sustainable transport options such as walking and cycling are to be welcomed and encouraged, and the Town Council could consider the potential to link this with policy	Consider link with 7.4	Have made cross reference

			7.4 in relation to green corridors		
4.1	STAT1	DCLG	New wording without normally. Are 1 bed dwellings expected to have 2 car parking spaces? If so, is it compliant with NPPF?	Provide evidence in plan	Census evidence referenced. NPPF checked, satisfied that we have necessary evidence
4.1	STAT3	SC	Need to clarify type of housing – do the same rates apply to small 1 or 2 bed flats for instance? This policy should consider the requirements of NPPF para 39 and whether there is sufficient justification or evidence for a local approach.	As above	As above
4.2	STAT3	SC	I am not clear whether this adds anything new beyond existing legislation or existing Core Strategy policy CS20.	Review	Satisfied that it is different. CS 20 refers to minerals, believe SC meant CS18.

4.3	STAT2	Healthcheck	Believes that this will infringe human rights of the landowner of the spaces:..... standard human rights of individual landowners. Eg Policy 4.3 and the loss of parking from potentially private land that may have no formal allocation.	Change the wording to lose 'recognised	Revised
4.5	STAT3	SC	New development could also provide covered cycle parking facilities on site.	Leave as is	No change
4.6	STAT3	SC	How will accessibility improvements adjacent to the development site be identified and sought? What is meant by "adjacent"? This section would benefit from the inclusion of cross reference to Core Strategy policy CS7: Communications and Transport	Review	Wording revised. CS7 cross referenced
Objective 5	STAT2	Healthcheck	More relevant CS reference should be used	Review	CS refs revised throughout
5.1	STAT1	DCLG	Define viable	Review	Definition provided
5.1	STAT3	SC	I appreciate why you may wish to have this as a statement but I am not sure how much added value this policy brings over and above Core Strategy policies CS8 and CS9. I am also concerned that it brings in a number of tests about which no	Review	Definition provided and policy revised

			<p>information is provided such as “a higher community value”; “no longer needed or viable”; “no realistic alternative community use” – how are these measured or established to implement this policy? How will applicants and decision makers know how to use the policy properly?</p> <p>This policy should also consider the requirements of NPPF paras 173 to 176 about viability and deliverability.</p>		
5.1	STAT8	Sharon Clayton Much Wenlock Town Council	<p>This policy states:</p> <p style="padding-left: 40px;">"The Plan supports the protection of existing facilities designed to meet the needs of local residents, businesses and visitors, and will not support any developments which remove community facilities unless: - the facilities are replaced by equivalent facilities which the Town Council considers have a higher community value....."</p> <p>As far as I can see, this is the only reference to the Town Council taking a decision. On what grounds will the Town Council decide the value of community value? Will this be through consultation or is there already an evidence base?</p> <p>This document sets out objectives which have been developed through consultation. I think this statement does</p>	Review policy	Policy now has clear guidance on what needs to be demonstrated in relation to viability. Ref to TC removed.

			<p>not demonstrate support from the community since it states that the Town Council will make a decision based on what it feels is right. I suggest that this statement is re-phrased e.g.</p> <p>“The Town Council will not support the removal of community facilities unless it can be substantiated that their replacement by equivalent facilities have a higher community value," or "the facilities are replaced by equivalent facilities which the local community considers will provide higher community value".</p> <p>This Plan is for the community, not the Town Council.</p>		
5.3	STAT1	DCLG	<p>What is need? Will CIL monies be needed for maintenance?</p>		Policy revised. Reasons already clarify funding for maintenance
5.3	STAT3	SC	<p>The Plans needs to define what is meant by “recognised need” and what information might be required to establish this.</p> <p>There also needs to be a cross reference to this in the Place Plan for it to be justified as a developer contribution, and awareness that the viability of recreational and tourism developments may not support such contributions.</p>	Review	Policy revised. Reference to Place Plan which already references toilets.

			There would be a NPPF conflict if policies were to be used to refuse otherwise perfectly acceptable and desirable schemes.		
Objective 6	STAT1	DCLG	The objective refers to the importance of having regard to existing traditional styles yet Policy 6.3 encourages ‘a mixture of traditional and modern styles.’ This implies an inconsistent approach. Do you have specific ideas on the type of styles? An image library or further information on what you are looking for would be helpful.	More reference to Design Guide which provides this detail	Justification revised and Design Guide referenced
	STAT3	SC	As a general comment the objective appears to be written as if it were a policy and the statements might perhaps be better reflected as policies. Also I am not clear which geographical area the policies refer to “around Much Wenlock” (policy 6.1); “within Much Wenlock” (policy 6.2); “the parish” (policy 6.3) Again the Plan and policies need to consider viability issues as set out in the NPPF para 173 to 176 to that development is enhanced and not squeezed out.	Review	Objective adjusted slightly. References were very specific intentionally eg Design Guide only applies to MW not parish. Only MW and Bourton have Conservation areas. Considered against NPPF and satisfied that policy

					complies.
Objective 6	STAT6	English Heritage	It is not clear to us whether the objective is advocating materials appropriate for the conservation area itself or that the palette of materials in those conservation areas should be the model for the rest of the settlements.	Consider redrafting the second ticked bullet point in Objective 6.	Revised
6.1	STAT3	SC	Need to clarify what is meant by “respect the skyline” and how this might be demonstrated. This policy also needs to refer to an evidence base and take into account landscape character and sensitivity issues from formal assessments.	Evidence base to be made available	Reference to evidence base made. Wording changed re skyline
6.3	STAT3	SC	This refers to housing development only which raises the question of what about other forms of development in the wider parish in line with policies 6.1 and 6.2?	Omit housing	Policy removed rely on CS
6.4	STAT3	SC	The Plan needs to justify through evidence why the policy threshold has been set at three dwellings and to define what is meant by “garden space is adequate”.	Review	Policy re-worded
6.4	STAT1	DCLG	Who is responsible for design brief? Adequate garden space is ambiguous – what is ‘adequate’? is there a threshold for each dwelling size? What is the evidence and justification for this?	Clarify	Clarity to design brief added. Change to wording re garden size
6.4	STAT2	Healthcheck	Refers to ‘design brief’ but does not	As above	As above

			explain who will prepare this.		
Objective 7	STAT3	SC	General comments The different terms used in these policies could be confusing. For instance, what is the difference between recreational open space, green space, formal and informal open spaces, green open spaces? Unless there is a glossary which defines exactly what is meant by each category, and this should be considered. Also there is a prospect that the policies may not deliver the sort of facilities the community actually want.	Clarify	Have revised terminology. There will be a glossary
Objective 7	STAT4	Natural England	The nine objectives identified within the Plan can be broadly supported, and especially Objective 7 – Green and open Spaces. The protection and improvement of existing green/open spaces is to be encouraged and the creation of new green spaces, with the potential for ecology and biodiversity enhancements is supported.	None	Noted
7.1	STAT3	SC	This should make explicit reference to Shropshire Council's Open Space, Sport and Recreation Study. At the moment, this policy asks for contributions to recreational open space for the whole of Much Wenlock but then	Clarify	SPD referenced Justification revised.

			states that there is only a shortfall in the south of the town. Developers are likely to query why they are being asked to contribute to facilities for parts of the town where there is no identified shortfall.		
7.2	STAT3	SC	An evidence base will be needed to support the designation of Local Green Space. This should set out the particular interest(s) of the site and show how this meets paragraph 77 of NPPF. A map should be provided with clear boundaries of these sites to accompany the evidence base. Windmill Hill is an important Local Wildlife Site and good biodiversity information is available for the evidence base from Shropshire Wildlife Trust and Shropshire Ecological Data Network.		Evidence base referenced as per NPPF. Sites shown on map.
7.3	STAT3	SC	How will existing green spaces be protected? Is it through a policy in the NP or through the Shropshire Council planning policy. If Policy 7.3 is to provide this protection it should be re-worded to provide criteria by which to judge a planning application with reasons to show why it is necessary. How will developers know which other formal and informal open spaces are important to the community for their		Policy deleted.

			beauty, amenity, wildlife and/or recreational value? Are these shown on a map and has nature of their importance been defined for each one? Unless this has been done, this policy is unlikely to work.		
7.4	STAT3	SC	What is an accessible link? Does this mean wheelchair access? A definition is needed. I would add 'NPPF 11: Conserving and enhancing the natural environment' to the policy list.	Improve clarity	Policy reworded. NPPF11 was already referenced
7.4	STAT4	Natural England	This can be linked back to policies on housing and traffic management, further strengthening the Plan.		Have linked with Traffic Mgt policies
Objective 8	STAT3	SC	General comments Phrases such as 'environmentally acceptable' 'significant features of nature conservation value' and 'important hedgerows' are open to interpretation and so may not deliver the sorts of benefits the community wants. There are no European protected sites within 10km of Much Wenlock and so this settlement has been screened out of needing more detailed consideration under the Habitat Regulation Assessment. See 'Shropshire Core Strategy, Site Allocation & Management of Development: Issues & Options Habitat Regulation Assessment, Stage 3		Reworded policies and justification

			Report		
8.1	STAT4	Natural England	This policy is to be encouraged and supported, the following hyperlink may provide some useful information on how to take this objective forward http://www.afterminerals.com/habitatselection.aspx	Consider the link provided.	Noted
8.1	STAT3	SC	Quarries in the Much Wenlock area are very important biodiversity sites and it's good to see these have been valued by local people but appropriate evidence is required to justify the identification of these three particular quarries as unsuitable for new industrial or commercial uses, otherwise it is considered this policy does not add value to Core Strategy policy CS20. How does their ecological value compare with other quarries that haven't been chosen? (e.g. Shadwell Quarry). Un-evidenced policies should be avoided. A map showing clear boundaries of these sites should be provided.	Provide evidence	Policy reworded and evidence provided. Map shows quarries.
8.2	STAT3	SC	On my reading I cannot see how this policy adds any value to NPPF approach or existing policies in the Core Strategy. If the policy is to be reworked and retained then I would consider adding habitat creation to retention and enhancement.	Review	Policy deleted

8.3	STAT4	Natural England	<p>Biodiversity enhancements – application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. Consideration should be given to securing measures to enhance the biodiversity of sites from applicants. Also note Section 40 of the Natural Environment and Rural Communities Act (2006) which states that <i>‘Every public authority must...have regard...to the purpose of conserving biodiversity’</i>. Section 40(3) of the same Act also states that <i>‘conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat’</i>.</p> <p>Landscape enhancements – consider opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment through the use of natural resources. Landscape characterisation and townscape assessments, and associated sensitivity and capacity</p>	Consider a policy approach to biodiversity enhancements and characterization assessments.	<p>NP covered by Core Strategy which is subject to same legislation.</p> <p>Paper to MWTC suggesting it may wish to take up opps for enhancement on land it owns</p>

			assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts.		
8.3	STAT2	Healthcheck	Policy 8.3 replicates policy 3.2. This Objective is the only one to refer to 'other relevant documents'. For consistency, it would be good to include reference to such document, including SPDs for each of the other Objectives, where appropriate.	Noted -disagree	Refs to SPDs added
8.4	STAT3	SC	'Important hedgerow' has a specific meaning under the Hedgerow Regulations, and relatively few hedges fall under this definition. Do you mean to use this restricted definition? If not I would change 'important' to another phrase.	Review	Wording changed
Policy 9.1	STAT3	SC	This policy contrasts with policy 3.4 which seeks to achieve a Level 5 with reference to domestic water consumption – different levels cannot be delivered within individual dwellings. The Plan should have regard to the national position and to SC policy and draw upon evidence to support the Policy. This policy also focuses on residential development and should consider other	Review	Reference to housing deleted, otherwise no change

			forms of development as well.		
Policy 9.2	STAT3		This policy requires evidence to justify the non-inclusion of wind energy proposals and as it stands it contradicts the approach taken by the Core Strategy in policy CS8.	CS8 saysPositively encouraging infrastructure, where this has no significant adverse impact on recognised environmental assets, that mitigates and adapts to climate change, including decentralised, low carbon and renewable energy generation, and working closely with network providers to ensure provision of necessary energy distribution networks.	Justification revised. Reference to AONB Management Plan. Policy doesn't resist wind turbines but positively supports other forms of energy.
9.2	STAT1	DCLG	How will this be implemented? Consider this in more detail We refer to 'residents were opposed to wind power in this location.' This statement does not link through to the		Policy refers to small scale devts. See above

			objectives or Policies. Furthermore, applications for wind turbines will be dealt with at a higher Planning level. May need to consider whether this statement is required? – if so the Neighbourhood Plan would benefit from a brief summary and the a cross-reference if the reader requires more detailed information.		
<i>Objective 9 and 9.2</i>	STAT5	Environment Agency, Mark Davies	Objective 9 and Policy 9.2 could make reference to local biomass facilities.	Amend	Noted; include in the policy.
Policy 9.3	STAT3	SC	The planning system has no control over crop/food production from agricultural land, so this policy cannot be implemented and will need to be rethought.	Review	Deleted
General	STAT6	English Heritage	English Heritage welcomes the production of the draft neighbourhood plan for Much Wenlock . We note that the Plan contains a robust set of policies for the management of the historic environment of Much Wenlock and Bourton with a good complementary set for Design and Landscape. We commend the work that has gone into the document and we look forward to seeing how progress on implementing it materialises.		Noted
General	STAT7	COAL Authority	No comment		