

Thank you for inviting me to undertake the Examination of the Broseley Neighbourhood Plan.

Having received all the necessary documents my Examination has begun.

I have reviewed the material for any "fatal flaws" that would prevent the Examination proceeding. There are some issues where I would welcome clarification.

#### SEA screening

Please may I be sent copies of Environment Agency, Natural England and English Heritage's responses to being consulted on the conclusions of the SEA screening (as cited in paragraph 4.5)

#### HRA screening and Appropriate Assessment

Please may I be sent evidence of Natural England having been invited to express a view on the HRA Screening and Appropriate Assessment (as referenced in paragraph 4.5.1 of the Appropriate Assessment) and have confirmation if no view has been received.

#### Basic Conditions Statement

The Basic Conditions Statement is incomplete. A number of policies are omitted from the assessments in relation to the NPPF (Policy A1, DS1-10), development plan (Policy A1) and sustainable development (Policies A1, DS1-10, VE1, WA1, CH1-2). Please may I be sent a complete Basic Conditions Statement addressing these and any other omitted policies, or an explanation as to why they have not been included.

Is there any evidence to support the statement in paragraph 5.1 of the Basic Conditions Statement that the Plan has regard to essential human rights obligations?

#### Consultation Statement

It would be helpful to have evidence of changes being made to the Plan as a result of the Regulation 14 Pre-Submission Consultation.

How were the landowners for the proposed "Valued Green Spaces" and for the site allocations and land proposed to be included within the development boundary consulted with on the Plan and is there any further correspondence reflecting their views?

I do not anticipate a need for a hearing.

There are a number of other points on which further clarification from Shropshire Council would be helpful:

- Does Shropshire Council consider the submitted Plan to be in general conformity with the strategic policies of the development plan, including in relation to the location of the development boundary and the approach to supporting development outside the development boundary?
- Has Shropshire Council provided any comments on the Plan since those provided during the Regulation 14 public consultation?
- Is Shropshire Council content with the conclusions of the SEA Screening?
- Is Shropshire Council content that Policy WA1 deals with non-strategic matters appropriate to a neighbourhood plan?

- What is the status of the development granted on appeal off Avenue Road (Ref 16/02438/REF) and of the Dark Lane site identified in paragraph 8.3a
- What is the planning status of any design statement for Broseley?
- What is the planning status of the Town Plan for Broseley?

There are a number of points on which further clarification from Broseley Town Council would be helpful (and any additional comments from Shropshire Council on these would also be welcome):

- What is the Town Plan and its relationship to the neighbourhood plan? Please may I be sent a copy
- Who prepared the SEA screening statement?
- What is the "Design Statement", how was it prepared and please may I be sent a copy?
- What was the selection process for identifying and allocating the residential development site off Avenue Road? Did it include a call for sites to be included? What was the relationship with the site selection process for the Local Plan?
- paragraph 8.3 - What is the evidence supporting a reduced rate of windfall developments
- paragraph 8.4 - What is the definition of "infill" and "windfall" sites? Are all infill sites also windfall sites?
- Where is the existing development boundary defined?
- The development boundary is proposed to be amended off Cockshutt Lane. There is a conflict between the new boundary shown on page 40 and on page 42 in respect of whether Valued Green Space is included or not? Which boundary is the Plan proposing?
- Policy HO3 - What is the evidence for "severe constraints in the road network"?
- Policy HO4 - What is the evidence/rationale for proposed sites being within "1200 metres of Broseley town centre" and where is the town centre boundary defined?
- Policy HO4 - What is the definition of "local people"?
- Policy HO5 - What is the purpose of this policy over and above Policy HO4?
- paragraph 3.12 - Where is the Conservation Area status of the part of Ironbridge Gorge World Heritage Site in the neighbourhood area defined?
- The boundary of the World Heritage Site on page 9 differs from that of the Conservation Area on page 5 by extending further south along Ironbridge Road than the junction with Calcutts Road - which map is correct?
- paragraph 8.11 & Appendix 4 - What is "Homepoint"? Is more recent evidence available and are figures available over a number of years?
- paragraph 9.5 - What is the justification and where is the supporting evidence for amending the development boundary off Cockshutt Lane for employment use?
- Policies GR1 & GR2 - Is "Valued Green Space" intended to be the same as "Local Green Space" as described in the NPPF (paragraphs 101-103) and as inferred in the first paragraph on page 31?
- Does the Town Council consider the assessment of Valued Green Space in Appendix 3 addresses the considerations for Local Green Space set out in NPPF paragraph 102? I am happy to receive any additional information on how the sites address these considerations?
- Were any potential Valued Green Spaces assessed and found not to meet the criteria? Please may I be sent the results of any such assessment

- Please may I be sent a more detailed map/maps showing the boundaries of the proposed Valued Green Spaces
- Policies GR4 and GR5 - Can any more details (including a map) of the "wider footpath network", "gaps" and/or opportunities to "improve existing provision" be provided, including those identified in Policy GR5
- Policies GR4 and GR5 - Is it the intention this also addresses routes for cyclists and horse riders?
- Policy GR5 - what is the effect of being designated as a "green route" intended by this Policy
- paragraph 9.6 and Policy EJ4 - How does the "Primary Shopping Area" relate to the "Designated Retail Area" - are they the same and where have they been defined and designated? Is there a more detailed map showing the boundary of the Primary Shopping Area(s) than that on page 42? How does this relate to "Broseley town centre" as referenced in Policy HO4?
- Policy VE3 - Is the location of the countryside between Broseley and the World Heritage Site defined?
- Policy VE4 - Where are the areas given they do not appear on the Policies map as indicated?
- Policy SD1 - Is there a definition of "high standard of energy efficiency"?
- Policy SD4 - What is the justification and evidence supporting the aim for an "excellent" standard?
- Policy WA1 - This is not included within the Plan's nine policy areas. It appears to be a response to the Appropriate Assessment but this is not referenced in the justification. It would be helpful to understand the rationale for the Policy and what consideration has been given to its suitability for inclusion as a non-strategic policy in the neighbourhood plan
- Policies A1, DS1 and CH1 - There appears to be significant overlap between these policies - what is the intention behind having design policies in different parts of the plan?

These requests and the responses should be made publicly available, such as by being put online.

I may come back with further questions or requests as the Examination proceeds. I shall be visiting the area shortly and it would be helpful to have the Valued Green Space map(s) within the next week.

Thank you for supporting the process. It will be helpful if all correspondence is shared between Shropshire Council, Broseley Town Council and myself.

Tony

Tony Burton