

## **Telford and Wrekin Local Plan**

### **Schedule of Matters, Issues and Questions**

This document lists matters (topics), issues (points for consideration), and questions that will form the basis for discussions during the hearing sessions and supply the context for any further written statements. Matters and Issues may change as the examination progresses, although participants will be given an opportunity to comment on any new Matters and Issues that arise. If sufficient information is provided on any particular questions, we may decide not to pursue them further in any depth.

Answers to questions should be supported with reasons, unless exceptionally it is clear from the question that a simple yes or no answer is required. There may be some overlap between questions, in which case answers may be cross referenced as appropriate. Text that may be found in submitted evidence documents or within the Plan itself need not be repeated at length, but references (with page and paragraph numbers) to those documents should be provided where relevant. Responses to each Matter should start on a new page.

All questions should be answered by the Council. Other participants may respond to issues relevant to points they have made in their earlier representations. At the hearing sessions, opportunity will be given to participants to raise any other soundness issues set out in their previous representations and not covered in these MIQs.

Please note that where reference is made to specific paragraphs of the National Planning Policy Framework (the Framework), these relate to the December 2024 version.

#### **A LEGAL COMPLIANCE**

##### **Matter 1 – Compliance with statutory procedures and legal matters**

**Issue 1: Has the Council met the statutory duty to co-operate ('DtC') as set out under sections 20(5)(c) and 33A of the Planning and Compulsory Purchase Act 2004 as amended? (We shall examine this issue having regard to the [letter from Matthew Pennycook MP to the Planning Inspectorate dated 27 November 2025](#))**

1. Has the Council submitted robust evidence to demonstrate that the duty to co-operate has been met?
2. Has the Council carried out effective engagement with neighbouring local authorities and other prescribed bodies on all relevant strategic matters? In particular has effective engagement taken place in respect of housing and employment needs and provision in a cross-border context?
3. Are there any remaining areas of dispute between relevant authorities and bodies relating to the duty to co-operate and its fulfilment by the Council? If so, please give details? Are they resolvable in terms of soundness?

**Issue 2: Does the Sustainability Appraisal (SA) adequately assess the environmental, social and economic effects of the Plan in accordance with the legal and national policy requirements?**

4. Have the likely environmental, social and economic effects of the Plan's policies and proposals been adequately assessed in the SA?
5. Has the SA properly assessed the likely significant effects of all reasonable alternatives?
6. Have all potential site allocations been assessed on a comparable basis?
7. Is it clear how the SA has influenced the Plan and the choice of development strategy? Does it support the development strategy or is there anything in the SA which indicates that changes should be made to the Plan?
8. Is the methodology in the SA sound and is it consistent with relevant guidance including the National Planning Practice Guidance (PPG)?

**Issue 3: Has the Habitat Regulations Assessment (HRA) been undertaken in accordance with the Regulations and is it robust?**

9. Have the requirements of the Conservation of Habitats and Species Regulations 2017 as amended, as explored through subsequent case law, been satisfied in the preparation of the Plan?
10. Is it clear how the HRA has influenced the approach in the Plan?
11. Does the HRA recommend modifications to the Plan? If so, have these been made/are they being proposed by the Council?

**Issue 4: Has the Plan been prepared in accordance with other legal and procedural requirements?**

12. Does the Plan conform with the Local Development Scheme?
13. The Plan period is 2020-2040. Is this sufficient and in accordance with national policy?
14. Does the Plan comply with the Statement of Community Involvement and have the minimum consultation requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 been met?
15. Does the Plan accord with Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 and national policy in respect of climate change?
16. Is it clear from the Plan how it relates to any other plans that form the Development Plan for the area?

17. Has the public sector equality duty been met in the preparation of the Plan?
18. Does the Plan comply with all other relevant legal requirements, including those in the 2004 Act (as amended) and the 2012 Regulations?

## **B SOUNDNESS**

### **Matter 2 – Vision, Priorities and Development Strategy**

#### **Issue 1: Have the vision, priorities and development strategy been positively prepared, are they justified and consistent with national policy, and can all be realistically achieved?**

19. Does the Plan set out an appropriate vision for the Borough based upon the evidence?
20. What does 'a Forest Community' mean?
21. Are the vision, priorities and the development strategy justified, have they been positively prepared, and do they accord with the evidence and national policy?
22. Has the development strategy been fully informed by the SA and other evidence? Is it soundly based?
23. Have reasonable alternatives been considered and clearly discounted on the evidence?
24. Is the site selection process clear and suitably robust, supported by the SA and other evidence?
25. Is the development strategy sufficiently clear about the respective roles of Telford, Newport and the rural area?

### **Matter 3 – Strategic Policies (Housing)**

#### **Issue 1: The approach to the housing requirement**

26. Is the housing requirement figure of 1,010 dwellings per annum/20,200 over the plan period as set out in Policy Strategic S4 soundly based, and does it accord with the evidence and national planning policy and guidance?
27. Is the inclusion of 153 dwellings per annum as a contribution to the unmet needs of the Black Country Authorities justified and supported by evidence?

## **Issue 2: The five-year supply and overall housing supply position**

28. Will there be a five-year supply of specific, deliverable sites from the intended date of adoption of the Local Plan?
29. Does the plan make provision for a supply of specific, developable or broad locations for growth for the subsequent years 6-10 and where possible years 11-15 of the remaining plan period?
30. Are the allowances for windfalls and lapses soundly based? Are they justified?
31. Are the Sustainable Communities fundamental to the housing delivery strategy such that they should be referred to in Policy Strategic S4?
32. What does criterion 4 of Policy Strategic S4 mean? Is it unambiguous in what it is requiring? Is the trigger level clear? Having regard to the policy and para 4.41 of the supporting text, are the actions which the Council would then take clear and achievable?
33. What does criterion 5c of Policy Strategic S4 mean when it refers to a 'brownfield first' approach to windfalls? Is this justified? Is it clear as to how it would be applied?

## **Matter 4 – Strategic Policies (other than Housing)**

### **Issue 1: Have the Strategic Policies been positively prepared, do they reflect the priorities and development strategy, are they justified by a robust and credible evidence base, and are they consistent with national policy?**

34. Are Policy Strategic S1 and Policy Strategic S2 worded clearly enough such that there is no ambiguity or lack of understanding as to what is expected of development proposals?
35. Is the employment land figure in Policy Strategic S3 justified by and consistent with evidence of need over the Plan period?
36. (a) Does the Plan identify sufficient land to meet the identified need for employment land? (b) Is the delivery strategy for employment land in Policy Strategy S3 consistent with the evidence on sources of supply? What about employment allocations carried forward from the previous Local Plan and new land in Sustainable Communities?
37. Is the Plan clear enough to be effective about: (a) how the strategy for employment land relates to the overall strategy for growth; and (b) the broad quantum and location of different employment land types to be delivered?

38. Is the Plan soundly based, having regard to Framework paragraph 90 and anticipated needs for retail, leisure and other town centre uses?
39. To be sound, does Policy Strategic S3 need to address other key economic sectors identified in Section 3 of the Plan? What about town centre renewal, tourism and the rural economy for example?
40. Is Policy Strategic S5 sufficiently clear how development proposals should mitigate and adapt to climate change and how such proposals will be considered?
41. Is Policy Strategic S6 sufficiently clear how development proposals should contribute to healthy stronger communities? In particular, is the approach to proposals for hot food takeaways, betting shops and vape shops (criterion f) sufficiently clear and unambiguous and justified by the evidence? What does 'overdominance' mean?
42. Is Policy Strategic S7 justified, consistent with the evidence and does it accord with the relevant regulations?

### **Matter 5 – Allocations**

#### **Issue 1: Whether the allocations and their requirements are justified, effective, and consistent with national policy.**

43. Are the site allocations in Appendix 15 justified? Do they accord with the development strategy? Are they deliverable/developable and supported by the evidence? Is the estimated housing number for each site a reasonable figure based upon the evidence?
44. Are the requirements within Policy HO1 justified, sufficiently clear and unambiguous?
45. Do any of the proposed site allocations in Appendix 15 have specific requirements which should be set out in the Plan?
46. Do the 'carried forward' employment allocations need to be included in the Plan for it to be sound?

#### **Issue 2: Whether each of the Sustainable Communities allocations in Policy HO2 and their policy requirements are soundly based?**

47. Are each of the Sustainable Communities (SCs) allocations and their policy requirements justified, deliverable/developable, consistent with national policy and supported by the evidence? Do they accord with the development strategy of the Plan?
48. Does the evidence support the expected delivery trajectory on each site? Does the market and other evidence take account of all three SCs seeking to deliver housing at a similar time in a similar part of Telford?

49. Do any of the proposed requirements of Policy HO2 for each site conflict with or duplicate the other policy requirements of the Plan?
50. Will Policy HO2 and the approach it proposes to bringing the sites forward be effective in ensuring that all the requirements for each SC can be achieved?
51. Does the evidence demonstrate that all three SCs are viable in respect of delivering all the requirements of Policy HO2 and other relevant policies of the Plan when taken together? Are any of the SCs reliant upon external funding?
52. (a) Is the employment land requirement in each of the SCs justified? (b) Does the policy include sufficient clarity and/or flexibility around the quantum, location and type of non-residential development to be delivered in the SCs?
53. How have the impacts of growth planned in the SCs on infrastructure and flood risk, individually and cumulatively, been assessed and where is this set out?
54. How will delivery of additional infrastructure be coordinated between the three SCs, and between developers and relevant agencies, and how will this be secured? Does this need to be explained in the Plan?
55. Does the policy need to specify the size of new schools required in the SCs to be effective? Is there sufficient flexibility if evidence on school place planning changes over the Plan period?
56. (a) Is there clear and convincing evidence of the highways and sustainable transport infrastructure that is needed for successful delivery of each SC, including mitigation of traffic impacts on local roads and existing communities? (b) Does necessary transport infrastructure and its expected phasing need to be set out in the Plan for the policy on SCs to be effective?
57. (a) How will vehicles access SC2 and what effect will this have on existing residents and businesses? (b) What alternatives were considered and why were they ruled out? (c) How will any harmful impacts be mitigated?
58. Does the policy need to require development in SC3 to contribute to projects for the enhancement of heritage assets with tourism potential (such as the Shrewsbury & Newport Canals and Wappenshall Wharf) for the Plan to be effective?

## **Matter 6 – Development Management Policies**

### **Issue 1: Whether the other housing policies are justified, effective, and consistent with national policy.**

#### *Policy HO3 – Housing mix and quality*

59. Are the requirements of Policy HO3 including requirements for internal space standard (Criterion 2) and M4 (2)/M4 (3) housing justified by the evidence? Can all developments provide a mix of house types and sizes?
60. Is criterion 4 of Policy HO3 clear and unambiguous so as to be effective?

#### *Polices HO4 and HO5 – Affordable Housing*

61. Are the provisions of Policy HO4 in terms of affordable housing requirements justified by the evidence and deliverable?
62. Is it clear how Policy HO4 and Policy HO5 are expected to work together? In particular, are the policies clear and unambiguous in respect of reduced or zero provision in terms of how criterion 4 of Policy HO4 and criterion 3 of Policy HO5 apply and relate to each other?

#### *Policy HO6 Supported and specialist housing*

63. Is Policy HO6 clear and unambiguous in its requirements including what constitutes an identified local need?

#### *Policy HO8 Gypsy, traveller and showpeoples accommodation*

64. Is Policy HO8 positively prepared and in accordance with national policy and guidance? Does it make sufficient provision for the needs of Gypsies and Travellers and Travelling Showpeople? Does it need to safeguard the future of the existing Travelling Showpersons site in Hadley, as recommended in the GTAA?

#### *Policy HO11 Self and custom housebuilding*

65. Is Policy HO11 justified and supported by the evidence in its approach to self-build and custom housebuilding?

#### *Policy HO12 Housing in Rural Areas*

66. Is Policy HO12 justified and effective? Is it consistent with, and does not duplicate, national policy?

#### *Policy HO13 Affordable rural exception sites*

67. Is Policy HO13 justified, effective and consistent with national policy?

**Issue 2: Whether the development management policies on economy and centres are justified, effective and consistent with national policy.**

*Policy EC1 – Employment development in the urban area and SEAs*

68. (a) Are the boundaries of the Strategic Employment Areas (SEAs) justified? (b) Do the SEAs need to be identified in the Plan for it to be sound?
69. Use Class E includes various main town centre and community uses such as shops, food and drink uses, professional services, indoor sport and recreation, medical services and day nurseries. Are such uses supported in SEAs? If not, how will this be managed and is this clear?
70. For the policy to be sound, does it need to (a) protect military-related facilities within the North Telford SEA, and/or (b) manage the effect of development on the function and operation of SEAs, such as in relation to design quality, traffic and amenity impacts?
71. Are supporting paragraphs 8.9, 8.11 and 8.14 clear and effective in explaining the policy approach in SEAs?

*Policy EC2 – Economic development in the Urban Area*

72. (a) Are the marketing information requirements in paragraph 8.12 justified and effective? (b) Are they intended to apply only outside of SEAs and, if so, is that clear?

*Policy EC3 – Employment in the Rural Area*

73. Does the policy apply to land allocated as SCs? For the Plan to be effective, does this need to be made clear?
74. (a) Is the policy approach consistent with national policy on supporting a prosperous rural economy, including in relation to agriculture and other land-based rural businesses? (b) Does the Plan recognise the economic benefits of the best and most versatile agricultural land as required in Framework paragraph 187b?
75. Is it necessary to include specific provision for development within the campus of Harper Adams University for the Plan to be sound?

*Policy EC4 – Waste management facilities*

76. Is the wording of the policy and supporting text effective in safeguarding existing strategic recycling facilities in the Borough as recommended in the Council's Waste Study 2024 Update (WM02)?
77. Is the requirement to create new employment opportunities in part 1c justified and proportionate?



78. Is the policy effective in protecting existing waste management facilities, including wastewater treatment facilities, from the impact of nearby development?

*Policy EC6 – Telford Town Centre*

79. Is the Telford Town Centre boundary justified, including (a) land north of the A5 and (b) the Town Park south of the Primary Shopping Area (PSA)?
80. (a) The policy refers to the PSA, but the Policies Map identifies a Primary Centre Area. Will the policy be effective given this inconsistency? (b) Is differentiation of a PSA Secondary Frontage within the policy justified, effective and consistent with national policy?
81. (a) Is the meaning of “high-tech” in part 1b clear? (b) Is support for high-tech uses in the Town Centre justified? (c) If yes, does the policy need to make clear where in the Town Centre such uses will be supported, to be effective?
82. Is the term “existing gateways” in part 2d clear and unambiguous?
83. Is it necessary for small-scale residential development be supported in the Town Centre for the Plan to be sound?
84. (a) What is meant by “multi-generational town centre living” in part 4b? (b) Is this requirement justified in the case of higher-density town centre development?

*Policy EC9 – Out of centre and edge of centre development*

85. Are references to the sequential test in the policy and supporting text consistent with national policy and guidance?
86. (a) Are the locally set floorspace thresholds for Retail Impact Assessment (RIA) and the distance of 500m from town centre boundaries justified and consistent with national policy? (b) Is it necessary to require a RIA for proposals affecting existing out of centre retail units for the Plan to be sound?
87. Is evidence about, and monitoring of, town centre vitality and viability sufficient for the policy to be effective?

*Policy EC11 – Shopfront and advertisement design*

88. Is the requirement to design proposals in accordance with guidance in a Supplementary Planning Document soundly based?

**Issue 3: Whether the climate change (CC) policies are justified, effective and consistent with national policy.**

89. Is the relationship between Policy Strategic S5 part 4 and the CC policies clear enough to be effective?

*Policy CC1 – Sustainable construction and carbon reduction*

90. Are the requirements in Policy CC1 intended to exceed standards in current and/or future Building Regulations? If yes, is this clear, and are the requirements justified and consistent with national policy? What effect will they have on development viability?

*Policy CC2 – Renewable energy in development*

91. Is part 1 justified and realistic for all development? Is there any unnecessary duplication with Policy CC1?
92. Are the policy's other requirements justified and effective, and do they include sufficient flexibility to be deliverable?

*Policy CC3 – Strategic renewable energy development*

93. Is the policy justified and consistent with national policy?

*Policy CC4 – Water re-use, conservation, efficiency and quality*

94. Are the requirements in Policy CC4 part 2 justified and deliverable?
95. Is the policy effective in its approach to water quality management?

*Policy CC5 – Flood risk management and sustainable drainage systems*

96. To be effective, does the policy need to include (a) reference to flood risk evidence (such as the Strategic Flood Risk Assessment); and/or (b) consideration of existing drainage assets?
97. Is the requirement to design Sustainable Drainage Systems in accordance with the Council's SuDs Handbook soundly based?

**Issue 4: Whether the natural environment (NE) policies are justified, effective and consistent with national policy.**

*Policy NE1 – Biodiversity and geodiversity*

98. Is it necessary to refer to the Lawton principles in part 1c?
99. Is the meaning of "appropriate buffer zones" in part 4c sufficiently clear?

*Policy NE2 – Trees, hedgerows and woodlands*

- 100.(a) Is the policy clear and unambiguous enough to be effective, particularly parts 2a and 5? (b) What is the justification for the species mix specified in part 2c?

101.(a) Is part 3 consistent with national policy? (b) Are the circumstances in which tree loss would be supported sufficiently clear, including in relation to commercially managed woodland/plantations?

*Policy NE3 – Biodiversity net gain (BNG)*

102.Is the aspiration for qualifying development to achieve 20% BNG, subject to viability, justified and consistent with national policy and guidance? Is it clear, so as to be effective, what is expected from development proposals? What effect will the policy have on housing delivery and other Plan requirements, including affordable housing and infrastructure?

103.Are parts 2, 4 and 6 justified, effective and consistent with national legislation, policy and guidance?

*Policy NE4 – Development Greening Factor (DGF)*

104.What is the justification for the DGF in addition to BNG? Is there evidence to show the Greening Factors of 0.4 for major residential-led, and 0.3 for major non-residential-led development, are deliverable, taking account of other Plan requirements?

105.How is delivery of the DGF expected to work alongside policies NE1 to NE3, CI3 and CC5.2? Is this clear enough for the Plan to be effective?

*Policy NE5 – Green network*

106.Is the extent of the Green network justified?

107.Is it clear which development proposals part 3 would apply to?

108.Is the inter-relationship between policy NE5 and other Plan policies (such as NE1 to NE4 and CI3) clear enough to be effective?

*Policy NE6 – Shropshire Hill and strategic landscapes*

109.Is the policy consistent with Framework paragraph 88c?

*Policy NE7 – Strategic Green Gaps*

110.What is the justification for the Strategic Green Gaps included in the policy? Are they defined in such a way that the policy will be effective?

111.Is an additional Strategic Green Gap at Wappenshall/Eyton necessary for the Plan to be effective?

**Issue 5: Whether the development design (DD) policies are effective and consistent with national policy**

112.To be consistent with national policy, do the DD policies need to include the 'agent of change' principle to ensure new development can be integrated effectively with existing businesses and community facilities?

*Policy DD1 – Design criteria*

113. Is there unnecessary repetition of requirements set out in other policies (e.g. in sections 6 and 7 of the Plan), which may make the policy unclear and ineffective?

*Policy DD2 – Housing development design*

114. Is there unnecessary repetition of requirements set out in other policies, including DD1, which may make the policy unclear and ineffective?
115. Is it clear how the policy will be applied to housing allocations and Sustainable Communities, given the design requirements for those sites/locations in policies HO1 and HO2?
116. In part 2, is the meaning of “Design codes/briefs”, “estate developments” and “detail...proportionate to the size of development” clear and unambiguous?

**Issue 6: Whether the policies for sustainable travel (ST) and transport networks are justified, effective and consistent with national policy and guidance.**

117. The Council’s emerging Local Transport Plan (LTP) is referenced in paragraphs 11.2, 11.13 and 11.19. (a) When is the LTP expected to be finalised, and will the ST policies be effective before then? (b) Is the Local Plan Transport Strategy referred to in paragraph 11.17 the same as the LTP? If not, what is it and does this need to be explained?
118. To be effective, does the Plan need to direct applicants to the proposals for borough-wide cycling and walking improvements in the Council’s Local Cycling and Walking Infrastructure Plan [IS06] and/or the Council’s Bus Service Improvement Plan [IS07]?

*Policy ST1 – Sustainable travel*

119. All the requirements in part 1 of the policy are subject to viability. (a) Is this justified? (b) Will this be effective in delivering the Plan’s sustainable travel objective?
120. In part 1c: (a) is the meaning of “dementia-friendly design” clear; and (b) is this design requirement justified for all major development in the urban areas?
121. Is the meaning of the phrases “accrued by the development” in part 1d, and “Where a development is served by one of the borough’s rail and bus stations” in part 2, clear and unambiguous?

*Policy ST3 – Impact of development on highways*

122. Is the approach to assessing and mitigating the traffic impacts of development soundly based, including in relation to SCs, allocated sites and impacts that cross administrative boundaries?

123. Is it clear how cumulative impacts of development will be mitigated “in a co-ordinated and plan-led manner” as stated in part 1a of the policy?

*Policy ST4 – Design of roads and streets*

124. Is the requirement to accord with national guidance such as the Manual for Streets soundly based?

125. Does the policy require street trees in all development? If no, is this clear? If yes, is this justified and consistent with national policy?

*Policy ST5 – Electric vehicle (EV) infrastructure and parking design*

126. (a) Is the requirement to meet parking standards set out in a separate guidance document soundly based? (b) Is the policy effective in relation to parking for delivery vehicles and HGVs?

127. Are the requirements for EV charging infrastructure soundly based given the relevant provisions in Building Regulations?

128. Is the requirement for “reasonable provision for storage of associated cycle equipment and where possible changing facilities” in part 3b justified and effective?

**Issue 7: Whether the policies for community infrastructure, culture and open space are positively prepared, justified, effective and consistent with national policy.**

*Policy CI1 – Community facilities*

129. Is the policy clear enough to be effective about (a) how demand arising from new development will be assessed; (b) application requirements in this respect; and (c) the basis for calculation of financial contributions towards off-site provision or up-grade of community facilities?

130. Is part 4 positively prepared in relation to infrastructure providers’ service transformation plans (e.g. the NHS)?

*Policy CI3 – Provision and management of open spaces*

131. Is the policy clear enough to be effective in relation to (a) the basis for calculation of financial contributions towards off-site provision or enhancement of public open space; and (b) how part 4 will be applied to outline planning applications?

132. Is the requirement in part 3 to accord with latest Council guidance soundly based?

*Policy CI4 – Leisure, culture and tourism*

133. Is the policy consistent with the national policy, including Framework paragraph 88?

134. Is there a tension between policies CI4 and EC3 or NE6 in relation to tourism and leisure development in rural areas? If yes, how should this be resolved for the Plan to be effective?

135. To be effective, is it necessary for the policy to (a) provide for cross-subsidy of leisure development through other uses such as residential; (b) seek developer contributions towards restoration of the Shrewsbury & Newport Canals; and/or (c) refer to 'glamping'?

**Issue 8: Whether the policies for the historic environment (HE) are justified, effective and consistent with national policy and guidance.**

136. (a) Are the HE policies justified by a proportionate evidence base? (b) To be effective, does the Plan make sufficiently clear what the Historic Environment Record comprises, and where this can be viewed?

137. Is the wording of each of the HE policies consistent with national policy on proposals affecting heritage assets and considering potential impacts?

*Policy HE1 – Heritage assets*

138. Is the supporting text accurate and comprehensive when listing different categories of heritage asset, such as registered parks and gardens and non-designated assets not on the local list?

*Policy HE2 – Ironbridge Gorge World Heritage Site (WHS)*

139. Is reference to the WHS Supplementary Planning Document and/or WHS Management Plan and/or Severn Gorge Conservation Area necessary within the policy for it to be effective?

140. To be effective: (a) is reference to the significance of the WHS and its Outstanding Universal Value in part 4 sufficiently clear? (b) Are the design criteria in policy DD1 specific enough to the needs and character of the WHS (as referred to in part 7)? (c) Does the policy need to include criteria specific to allocated sites within the WHS and its setting?

*Policy HE3 – Listed buildings*

141. Are the criteria in part 3 sufficiently clear and distinct to be effective?

*Policy HE5 – Buildings of local interest*

142. Is the policy consistent with national policy, including Framework paragraph 216?

*Policy HE6 – Historic parks and gardens*

143. Are references to registered parks and gardens accurate and consistent with national policy?

**Issue 9: Whether the policies for minerals and land (ML) are positively prepared, justified, effective and consistent with national policy.**

*Policy ML1 – Mineral safeguarding*

144. Part 1 of the policy refers to Mineral Safeguarding Area (MSA) buffer zones. Is it clear enough where these are identified for the Plan to be effective?

145. Are allocated sites and land allocated as SCs included within the MSA and therefore subject to the requirements of part 1 of the policy? Is this clear in the wording of the policy (and on the Policies Map)?

146. Are (a) criterion 1a, (b) the cross-reference to “points (i) to (v) above” in part 6, and (c) the order of the policy clear and unambiguous enough to be effective?

147. (a) Are parts 7 and 8 of the policy justified? (b) Is there unnecessary duplication in parts 7 and 8 which may make them unclear and ineffective?

*Policy ML2 – Maintaining aggregate supplies*

148. Is the policy positively prepared and consistent with Framework paragraph 224, which attributes great weight to the benefits of mineral extraction?

149. Is there a tension between criterion 1a and part 2, which may make the policy unclear and ineffective?

150. Are paragraphs 14.15 to 14.22 consistent with the most recent evidence on Local Aggregates Assessment for the Plan period?

*Policy ML3 – Mineral development*

151. Is criterion 1e (farming, horticulture and forestry) justified and consistent with national policy and guidance on assessment of environmental impacts from minerals extraction?

152. Should criterion 1k refer to the significance of heritage assets and their setting, to be effective and consistent with national policy?

*Policy ML4 – Land stability*

153. Is clarification necessary that land stability issues can occur near the canal network and reservoirs (and that the Canal and River Trust can provide advice on this) for the Plan to be sound?

*Policy ML5 – Land contamination*

154. Do the stated purposes of policy ML5 need to include protection of controlled waters, to be consistent with national policy?

155. To be effective, does the policy need to include a requirement to remediate and subsequently monitor contaminated land?

156. Is the meaning of the first sentence in paragraph 14.48 clear and unambiguous?

**Matter 7 - Monitoring and Review**

**Issue 1: Monitoring General**

157. Does the Plan have clear and effective mechanisms for monitoring?