



Edgmond Neighbourhood Plan

Summary of comments submitted to the Independent Examiner

Comments received during Publication of Edgmond Neighbourhood Development Plan Proposals Period 14 September 2017 to 27 October 2017

Date received	Name of contributor	Comments
22/09/2017	Brian Howett	I am very concerned about this "Local Plan" - and the so-called "Public Consultation". My more urgent observations are that in my time in the village Harper-Adams has multiplied in size, - and is now spreading across the B-5062 Shrewsbury Road. This will result in large numbers of students crossing a major road. Secondly - with "limited development" - in-fill housing has built on any plot available - a "finite resource". There appears to be NO protection against the threatened large-scale housing estates currently under application. No-one has ever consulted me, - my observation is that T&W's business is so largely conducted via Facebook and Twitter - when so many of us are not computer owners or computer literate. I was notified - after the event - that the Plan was available in the Village Hall - but there were NO public notices posted in advance. Is this the way for T&W to conduct "Public Consultation?"
22/09/2017	David Tapley	Edgmond and surrounding villages are in danger of being consumed by encroaching urbanisation from nearby Towns and Telford. Villages are by definition rural locations and it is important to respect their rural character. The Local Plan needs to set out clear protection from urbanisation for Edgmond and local villages in the rural area. There is no definitive statement to say that new planning for housing estates will NOT be permitted in rural areas, to include the rural villages. The local plan does not recognise the capacity of infill sites within Telford to provide additional housing for the new town. There no detail on how the two large brownfield sites will be dealt with? These sites must be fully utilised. Under utilisation of these sites should NOT result in more housing estates in the villages. Expansion of Harper Adams has the potential to undermine the rural character and landscape of Edgmond, surrounding villages & Hamlets. The Local Plan does not currently set a clear boundaries between village and University. Inappropriate expansion of the University will undermine the rural character of the Village so it's important that the University maintains its current physical separation. Further development should be
20/10/2017	Duncan Bayliss	 North of the Shrewsbury Road (B5062) while protecting Edgmond Marsh and Caynton. The central issue for Edgmond is maintaining its open and rural character, rather than becoming overwhelmed by development to end up feeling urbanised. I believe that means that we only want policies that are supportive of that goal and which nest well within the Local Plan. Edgmond is experiencing a lot of development for a small village, summarised in a table and map in the attached document ("The community response to application for 85 homes FINAL"). Edgmond is also experiencing a lot of development pressure for inappropriate developments. Developers clearly need a strong steer to come forward with appropriate schemes for limited infill only. The evidence of how much is being built in Edgmond and at Harper Adams University shows that Edgmond is taking a positive approach to development, but it needs to be steered carefully to maintain:

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		 the rural character of the village, the experience and enjoyment of the conservation area and listed buildings, the visual and physical separation of Edgmond, Harper Adams and Edgmond Marsh development that fits sensitively into the landscape.
		I attach the submission I made to the appeal for 85 houses off Shrewsbury road Edgmond, which was refused. (The inspector's decision notice is also attached). I believe the inspector took onboard the landscape arguments fully and the comments and evidence included there are I believe helpful in framing how the NDP and associated Landscape Assessment can be used to a positive outcome for the village. If the NDP had been adopted and the Landscape Assessment formally given more weight, I have nodoubt that the inspector would have leaned more on them in supporting her decision, which demonstrates a very positive trajectory for the NDP. The Landscape Assessment and its value needs to be maximised in the NDP. I believe it would also be beneficial if it were to receive further formal recognition by Telford and Wrekin as well, since it acts as a very helpful bridge between the Local Plan and NDP.
		Our suggestions are highlighted in yellow in the attached annotated version of the Reg 15 Plan to assist you, and repeated below for thoroughness.
		In summary, the main changes we believe are needed are: - At the Gladmans appeal the Landscape Assessment was central to the arguments for achieving refusal of that housing estate. Therefore the Landscape Assessment must be referred to throughout and carefully integrated.
		 Policy C2 needs to be removed. Developer contributions are only relevant to large developments like housing estates which we don't want, so it isn't helpful. Any major development at HAU can be subject to other agreements under Telford and Wrekin Local Plan provisions anyway. Policy E3. This policy needs amendment. It must be clear that HAU does not have carte blanche to do whatever it likes, but must ensure its developments fit into the landscape and work for Edgmond and Edgmond Marsh as well.

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		Therefore policy E3 should say that all developments at the University should fit in to and respect the rural landscape, cross referencing the Landscape Assessment. The rural character, appearance and setting of the University and of Edgmond must be maintained, cross referencing para 27 of the Inspector's decision regarding the Gladmans application. To achieve this, developments of more than 2 stories should not be built south of the B5062 (Shrewsbury Road). Any new lighting should be low cut off lighting, in order to minimise light pollution.
		Full details of suggested amendments are annotated on the attached Reg 15 Plan in yellow highlight (starting at page 13) and listed below for clarity. Summary of detailed comments policy by policy follow: Objectives No 6 – 'publicly accessible' needs to be added
		 Policy RES2 Needs to cross reference the Landscape Assessment and explain how it will be used Add the requirement to maintain the separation of Edgmond Village, Edgmond Marsh and HAU, with open countryside between all 3, cross referencing the Gladmans refusal notice 'Exceptions may be made for suitable appropriate affordable housing schemes', add 'within the village'.
		Policy RES3 The design criteria listed all need the caveat that they are to be appropriate to the rural character of the village, add cross referencing to the Landscape Assessment. Developments of more than 3 dwellings require an appropriate transport assessment
		Policy RES4 - 'Developers must provide clear evidence as to how their proposals have taken into account local character and distinctiveness', add specific reference to the Landscape Appraisal
		Policy G1 - the policy needs to make it clear that these are local green spaces with public access, this being different from open countryside that comes in to the heart of the village

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		Policy G2 - Needs to cross reference the Landscape Assessment
		Policy G3 - 'All new proposals will be expected to demonstrate safer and easier routes for pedestrians and cyclists to local services, facilities and existing networks', add appropriate to the village's rural context
		 Policy E3 This policy needs amendment. It should say that all developments at the University should fit in to and respect the rural landscape, cross referencing the Landscape Assessment. The rural character, appearance and setting of the University and Edgmond must be maintained, cross referencing para 27 of the Inspector's decision regarding the Gladmans application. To achieve this, developments of more than 2 stories should not be built south of the B5062 (Shrewsbury Road) Any new lighting should be low cut off lighting, in order to minimise light pollution.
		Policy C2 - This policy needs to be removed. Developer contributions are not relevant to limited infill. Appendix 1 - Needs to be substantially shortened or removed as it is not relevant to the aims of the plan.
		Appendix 2 Needs to include the Gladmans refusal notice of 27th September 2017.
20/10/2017	Ed Pugh	I live in Edgmond I would like to make some comments on the Edgmond Neighbourhood Development Plan. Overall, I fully support the vision set out in the plan, and the majority of the policies within the plan robustly support this vision. However, I think the plan should be strengthened in 2 main ways, in order to better achieve this vision:

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		1 - Policy E3 needs to set out how Harper Adams University is going to respect the rural character of its own setting and that of Edgmond and Edgmond Marsh. There are number of practical steps that could achieve this: for example siting multi story buildings north of the B5062.
		2 - As you will be aware, Edgmond Parish Council commissioned a Landscape Appraisal in order to provide supporting evidence for the NDP. The is an excellent piece of work which very accurately describes the village's character and what makes it special. However, it does need to be more thorough tied into the NDP, and specifically referenced within a number of policies.
		Protect Heritage Edgmond, a local campaign group, has submitted a number of more detailed comments on specific policies, which I fully support.
22/10/2017	Edgmond Parish Council	Edgmond Parish Council continues to support the Neighbourhood Development Plan as submitted for Regulation 16. Extensive community engagement took place over a period of time, to ensure that everyone had an opportunity to put forward their views, or at the relevant times, question the draft Plan. This included important engagement with representatives of Harper Adams University.
		Following the submission of the Plan, we attended the hearing of the Appeal on an application submitted in Shrewsbury Road, for 85 homes by Gladmans. As you are aware, TWC had refused this application as it is outside of National and Local Planning Policies and this decision was upheld by the Inspector at the hearing on 26th September.
		I attach the refusal notice, which contains important comments and evidence used in the decision and are in line with the TWC emerging local plan and the Edgmond Neighbourhood Plan. It is our intention to

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		refer to, and use, some of the statements included within the decision notice especially when relating to the
		"need to protect the only gap between the University's large campus and the village of Edgmond, completely altering its rural character and causing "severe harm" to the setting of both."
		We believe that the Landscape Assessment was an important factor in the decision and is equally as important as an appendix to our Neighbourhood Plan, it is also our intention to make more reference to the document within the final Referendum Version of our Plan.
26/10/2017	Environment Agency	I refer to your email of the 14 September 2017 in relation to the above Neighbourhood Plan (NP) consultation. We have reviewed the submitted document and would offer the following comments at this time. We would not, in the absence of specific sites allocated within areas of fluvial flooding, offer a bespoke comment at this time. You are advised to utilise the attached Environment Agency guidance and proforma which should assist you moving forward with your Plan. However, it should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the drainage team at Telford and Wrekin Council as the Lead Local Flood Authority (LLFA). I trust the above is of assistance at this time. Please can you also copy in any future correspondence to my
26/10/2017	Harper Adams University	team email address at SHWGPlanning@environment-agency.gov.uk The University is grateful to the Parish Council for the opportunity to engage with its work to develop the Neighbourhood Plan. The University has been able to comment at all stages of the consultative process and wishes to express its support for the regulation 15 consultation version of the Plan dated 29 June 2017.

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		The University has also had an opportunity to engage with the development of the Landscape Character
		Assessment document dated July 2017 and is supportive of the document.
22/09/2017	Helen Gardner	As a resident of Edgmond I would like to say that I fully support the comments made by Protect Heritage Edgmond in their submission to you regarding the above Neighbourhood plan.
		With regard to Policy E3 I believe that Harper Adams University should retain some separation from the village and any further large buildings should be sited north of the B5062.
22/09/2017	Historic England	Thank you for the invitation to comment further on the Edgmond Parish Neighbourhood Plan. Our previous substantive Regulation 14 comments remain entirely relevant, that is:
		<i>"Historic England are supportive of the Vision and objectives set out in the Plan and the content of the</i>
		document, particularly its' emphasis on local distinctiveness including undesignated heritage assets and the maintenance of historic rural character.
		Overall the plan reads as a well-considered and concise document which we consider takes a suitably proportionate approach to the historic environment of the Parish".
		I hope you find these comments helpful.
27/10/2017	John Hill	I am writing to state that I fully agree with the points already raised from Protect Heritage Edgmond in regard to the Neighbourhood plan.
27/10/2017	Louise Turner	I would like to express my general support for the proposed Edgmond Neighbourhood Plan.
		I have also read the comments prepared and submitted by Protect Heritage Edgmond. I would like to see their recommendations fully implemented.

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		i also have the following comments:
		Policy RES2. In order to remove any ambiguity & to protect the rural character and distinctiveness of Edgmond village and to protect the open countryside which extends into the village (as supported by the findings of the Planning Inspector assigned to decide the Gladman Appeal of Telford & Wrekin Council's decision to refuse application TWC/2016/0603) the wording of RES2 should be amended to say " development will be strongly resisted in the open countryside around, and in between , Edgmond Village, Edgmond Marsh, Harper Adams University"
		The above wording would be ensure there is an unambiguous policy statement, implementing the recommendation of the landscape assessment.
		 Policy RES3. Edgmond suffers from being used at a 'rat run' by vehicles from the new developments in Newport as well as Market Drayton and from the A41 as they commute to Telford. Also from traffic commuting from Telford direction to Harper Adams University. The last bullet of this policy should include a statement that "applications should be supported by a full and complete model of the traffic implications of the proposed development and also of ALL approved planning application within the local region which impact on Edgmond". This is actually an existing requirement of the NPPF but is never enforced by the local planning authority.

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		 this policy requires and unifying final sentence in order to ensure that street lighting, footpaths etc are designed to reflect the local rural character and not that of a suburban estate.
		Policy G1. I support this policy but its current wording, and those of the following paragraphs, are messy. We repeatedly see Developers use such 'ambiguity' to argue that agricultural land and land which is 'green and open' but which is privately owned and not accessible to the public, is not important or of significance to the village. Therefore:
		• The term 'local green space' should be clearly defined in the policy and the definition should include clarification that this land is either publicly owned and/or publicly accessible spaceThat the term 'green space' or 'open space' in this policy is does not refer to open countryside in or around the Parish/Village which is currently in agricultural use and/or privately owned. Such other open countryside and land in agricultural use in and around the village is equally important to local character and distinctiveness and is covered in other policy statements within the NP.
		Policy E3. Whilst I support the growth of HAU in order to ensure that it remains viable, I am extremely
		concerned about the absence of any scrutiny and control over its expansion which prevents developments at HAU impacting negatively on the rural character and distinctiveness of the village. There is a major problem of (a) light pollution from the university and (b) of large and inappropriate development south of the B5062. Therefore Policy E3 should include 2 statements:
		 developments higher than 2 stories (say 8m) should be restricted to north of the B5062 and to within the existing developed boundary of HAU any proposed lighting schemes should be accompanied by a full lighting design proposal which demonstrates that light pollution will not increase as a result of the proposal and that active measures have been included within the design to limit light pollution to the bare minimum.
26/10/2017	Natural England	Thank you for your consultation on the above dated 14/09/2017

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		 Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. For any queries relating to the specific advice in this letter only please contact Felicity Bingham on 02082 256387. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk. We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.
22/09/2017	Protect Historic Edgmond	Protect Heritage Edgmond is a local community group dedicated to protecting Edgmond's rural and historic character. Our group has widespread support within Edgmond and includes people with a number of relevant professional qualifications, including town planners, architects and MITPs. We fully support the vision set out in the draft Neighbourhood Development Plan and in particular we support building new houses on limited infill sites within Edgmond. There are lots of infill sites being built on in the village at the moment, with little or no objection from local people. However, we recommend that the plan is strengthened in a number of areas, in order to better achieve its vision.
		We would like to see the following key changes made to the plan: - the Parish Council commissioned a planning professional to undertake a Landscape Appraisal as part of the Neighbourhood Plan process. This has now been completed. At the recent Gladmans appeal the Landscape Assessment was central to the arguments used by the Inspector in refusing

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		a housing estate of 85 houses. Therefore the Landscape Assessment must be referred to throughout the NDP and carefully integrated.
		- Policy C2 needs to be removed. Developer contributions are only relevant to large developments, which aren't supported by this plan. Any major development at Harper Adam University (HUA) can be subject to other agreements under Telford and Wrekin Local Plan provisions anyway.
		- Policy E3. This should say that all developments at the University should fit in to and respect the rural landscape, again cross referencing the Landscape Assessment. The rural character, appearance and setting of the University and of Edgmond must be maintained, cross referencing para 27 of the Inspector's decision regarding the Gladmans application. To achieve this, developments of more than 2 stories should not be built south of the B5062 (Shrewsbury Road). Any new lighting should be low cut off lighting, in order to minimise light pollution.
		Full details of our suggested amendments are in the attached documents (comments are marked up in yellow in the Reg 15 Plan version of the plan, starting at page 13).
29/09/2017	Severn Trent	Thank you for the opportunity to comment on the Edgmond Neighbourhood Plan. At this time we have no detailed comments to make. To make detailed comments we will required detailed information on the number and type of properties proposed (household/commercial) and maps of the proposed sites. We have attached some general information which we hope this provides you with useful guidance. We look forward to providing you with more comprehensive comments when more detailed plans and geographical locations of developments become available.
22/09/2017	Simon Lord	I write as a long term resident of Edgmond to comment on the Local plan and its impact on our environment.

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		I have two strong opinions on the issue. Firstly that it is critical that Edgmond's character as an historic rural community be maintained. This character is threatened by large scale inappropriate development both as infil and as expansion of the village boundary. Restrictions on development should apply both in and out of the conservation area. While I appreciate the need to maintain essential services in the village I also think that the infrastructure cannot withstand rapid expansion.
		The second threat that I perceive is the unchecked expansion of HUAC. Any necessary development of the site should be low rise, in keeping architecturally and to the north of the main Shrewsbury road.
26/10/2017	Sue Davies	I am a resident of Edgmond and I would like to express comments on the Edgmond Neighbourhood Development Plan. Overall, I fully support the points set out in the plan however I wish to submit two areas that I would like to see strengthened:-
		1 - Policy E3 needs to set out how Harper Adams University is going to respect the rural character of its own setting and that of Edgmond and Edgmond Marsh. There are number of practical steps that could achieve this: for example siting multi story buildings north of the B5062.
		2 - As you will be aware, Edgmond Parish Council commissioned a Landscape Appraisal in order to provide supporting evidence for the NDP. The is an excellent piece of work which very accurately describes the village's character and what makes it special. However, it does need to be more thorough tied into the NDP, and specifically referenced within a number of policies.
		Protect Heritage Edgmond, a local campaign group, has submitted a number of more detailed comments on specific policies, which I fully support.

Local Planning Authority's Submission in Respect of the Edgmond Neighbourhood Plan Telford & Wrekin Council comments on Edgmond Neighbourhood Plan (Regulation 15/16 version)

Section/ Policy Area	Page/ Policy Ref	TWC Reg 14 recommended Suggestion	TWC Reg 14 Comments	Edgmond Neighbourhood Plan Response	Any additional comments following the Reg 15 version
Introduction		Amend text for consistency purposes.	In several parts of the NP text "Telford & Wrekin" is written as "Telford and Wrekin"	Amend where necessary	
	P8 3 rd paragraph	Amend wording to read"Telford & Wrekin Council's Cabinet "	The designation of the neighbourhood area did not go through the Cabinet process as stated in the paragraph. It was signed off under delegated officer authority.	Amend sentence as suggested: "Telford and Wrekin Council 's Cabinet -resolved in September 2016"	
Process of preparing the Plan	Р9	Amend accordingly to allow consistency to the Local Plan.	The NP states that the "Draft Plan may need to be amended so that it complies with the probable modifications to the Local Plan". The Council, in response to the Inspector's questions after the Examination hearing, has produced a schedule of modifications to Local Plan. The parish Council may need to refer to the document.	The draft Neighbourhood Plan will be checked against the Inspector's modifications when available.	

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National and Local Planning Policy Framework	P10	Amend text to read "Wrekin Local Plan is now time expired"	The third paragraph states that the Wrekin Local Plan is now out of date.	Amend text to read: "The previous Wrekin Local Plan (1995- 2006) is now time expired"	
Policies	Policy RES1	More justification is required	The definition of infill sites was discussed at the recent Local Plan EiP and the Inspector will provide comments on it in his report. It may be helpful to the NP examiner for the parish to articulate a justification for the NP's definition of infill sites.	The community considers that the range of likely infill sites in Edgmond village are only suitable for housing developments of not more than 3 dwellings. Proposals for more than 3 dwellings on likely infill sites are considered out of scale and character.	Policy RES1 continues to seek to apply an absolute limit on the number of homes proposed on individual housing schemes within Edgmond. This is considered to be more restrictive than the Telford and Wrekin Local Plan Policy HO10, which supports a limited amount of infill housing in Edgmond that can demonstrate that they will help to meet the rural housing requirement. No justification is presented to support a

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					scheme-by-scheme limit of 3 units as being a suitable definition of 'infill' development in Edgmond.
		Revise policy	The policy reads like a blanket policy restricting development in the countryside with exceptions only made to affordable housing schemes. Telford & Wrekin Local Plan SP3 supports development in the rural areas where it addresses the needs of the rural communities.	Disagree the policy refers to housing development only and has been amended to refer to 'open market' housing. Amend policy title to clarify that refers only to housing development: "POLICY RES2: NEW HOUSING DEVELOPMENT OUTSIDE OF EDGMOND VILLAGE"	
	Policy RES2		Policy uses the word "preserve" the built form. The word preserve is normally associated with historic assets. Does the Plan satisfactorily provide an explanation of the type of built form to be protected?		

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	Policy RES3	Revise policy	The policy provides criteria against which proposals are to be tested if they pass policies RES1 and RES2. It is suggested that instead of using "permitted", the policy should state that "where development is in line with the principles in policies RES1 and RES2" Last bullet point refers to minimum standards. Appendix F of the Telford & Wrekin Local Plan sets parking standards. These are not minimum parking standards.	Agreed. Amend policy as suggested: "Where residential development is permitted in line with <i>the principles in</i> policies RES1 and RES2" Agreed. Amend policy as follows: "Proposals that exceed the minimum parking standards in Appendix F of the Local Pan will be supported."	TWC comments has been taken on board satisfactorily.
	Policy RES4	Revise policy	Whilst the policy provides guidance on preserving and enhancing the Conservation Area (CA), it is silent on how harm to the CA will be assessed.	Disagree. The proposed amendment is not required. The policy seeks to take a positive approach to any development in the Conservation Area. It is clear that development which does not meet the NP policy criteria will be harmful to the	

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			The policy would be improved if it set out how any harm to the designated heritage asset (the CA) must be justified in line with guidance in the NPPF (para132, 133, 134).	historic character of Edgmond and will not be supported.	
	licy ES5				
Polic	cy G1	Revise policy to insert missing part of the sentence	Last sentence in the policy seems to be partly missing. The policy gives exemptions to appropriate community uses. Paragraph 76 of the NPPF rules out development on Local Green Space other than in very special circumstances. Paragraph 78 goes further in stating that policy for Local Green Space should be consistent with policy in green belts.	Agreed. Drafting error. Sentence should read: "Proposals for built development other than appropriate community uses on these Local Green <i>Spaces will</i> <i>not be supported.</i> " The wording is deliberate following experience elsewhere to allow for example additional recreation facilities, equipment storage or clubhouse/changing facilities.	

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			Table 1 provides information on proposed sites. Is that enough justification to allocate the sites as local green spaces?	Yes. Evidence matches that provided for approved Neighbourhood Plans elsewhere.	
	P20	Amend text	Second paragraph mentions "areas space". Do you want to mean "open spaces"?	Agreed. Amend as follows "protecting these areas space to contribute to"	
	Policy G2 Policy G3				
		Revise policy	Revise the phrase "Development proposals to " to read "Development proposals that "	Agreed. Amend as suggested: "Development proposals to that provide suitable,	The Reg 15 version of the ENDP has introduced additional wording into the policy
	Policy E1		The NP could be improved if it were to encourage provision of small " well designed " buildings consistent with	Agreed. Amend 2 nd bullet as suggested: "Provision of small <i>well-designed</i> new buildings or conversion of …"	that seeks to restrict the re-use of land or buildings on existing employment sites for residential without demonstrating that the

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			paragraph 28 of the NPPF.		existing use is no longer
			Theoretically, any new building will		viable or that the
			have an impact on character of the		proposal would provide
			village.		demonstrable
					employment benefits.
					The tone of the
					modification runs
					counter to the direction
					of the policy, which is
					positively written and
					supportive of
					employment
					development subject to
					certain criteria. The
					modification also runs
					counter to Policy HO10
					of the Telford & Wrekin
					Local Plan, which
					supports conversion of
					employment uses to
					residential within
					named settlements
					such as Edgmond.
	Policy E2				

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	Policy E3				
	Policy C1	Amend policy or appendix 3 to clearly signpost users to the community facilities referred to in the policy.	The policy offers protection to existing community facilities listed in the Parish Profile (Appendix 3). Appendix 3 contains information about the parish including community services under "Access to Services and Public Transport. Does the Policy C1 mean these community services? Should the title of the policy be reworded?	Agreed. Amend Appendix 3 to clarify that referring to community facilities listed rather than other services such as public transport. "Access to Facilities, Services and Public Transport Most community <i>facilities and</i> services are centered within the village of Edgmond. These include the following <i>community facilities:</i> "	
	Policy C2				