Review of Telford and Wrekin

Local Plan

ISSUES & OPTIONS PAPER

September 2020

Telford.

Protect Care and Invest to create a better borough

a co-operative council

Telford & Wrekin COUNCIL

Contents

1 How to respond to the Issues & Options consultation

1.1 How to respond to the Issues & Options consultation

Issues & Options Consultation - 12 October 2020 – 8 January 2021

We are seeking comments on the proposals in this document by 8th January 2021. We would encourage you to view the documents and to comment on them using the consultation portal (https://telford-consult.objective.co.uk/portal/) as this will not only save paper, but will also help the Council with processing comments received.

Where the Council is seeking specific feedback, questions have been included within the document in boxes marked up as below:

Example

Question: Do you have any comments to make on the proposed amendments to this policy?

If you need assistance in responding to this consultation please contact the Strategic Planning Team on 01952 384241. The consultation documents will also be made available during the consultation period at your local Telford & Wrekin library.

The deadline for consultation comments is **5pm on Friday 8th January 2021.**

How to be kept up to date with the review of the Local Plan

We are keen to engage with local residents, business community and a wide range of stakeholders as we review the Telford & Wrekin Local Plan 2011-2031. If you would like to be kept informed and engaged at each stage of this review you can register or amend your details for contact at the Planning Policy webpage on the Telford & Wrekin Council website, then via Planning Policy Consultations page click on the Consultation Portal link. Alternatively please send your contact details by email to LocalPlan@telford.gov.uk.

Further detail on how the Council will engage residents and stakeholders in the review can be found at www.telford.gov.uk/statementofcommunityinvolvement.

Confidentiality and data protection

Telford & Wrekin Council's Strategic Planning Team are collecting your personal data through the engagement opportunities presented in this document. All representations received in response to this consultation will be considered by the Council and published with names following redaction of other personal details. Representations will be published at the website link below, as well as further information and Local Plan Review updates www.telford.gov.uk/localplanreview.

This consultation will enable a well-informed and considered Local Plan that supports the sustainable growth of the borough and meets the statutory requirements under the Town and Country Planning (Local Planning) (England) Regulations 2012, wider legislation and Article 6(1)(e) of the General Data Protection Regulations 2018 or equivalent United Kingdom legislation.

Telford & Wrekin Council will not share any of your personal data with external organisations unless required/permitted to do so by law. For further details on the Council's privacy arrangements please view the privacy page on the Council's [website page](#).

2 Why are we reviewing the Local Plan?

2.1 Introduction

2.1.1   Telford & Wrekin Council has to plan for the borough's future development needs and this includes meeting the current economic challenges and opportunities as well as looking beyond to the next phase of growth for the area. The Review of the Telford & Wrekin Local Plan (TWLP) is critical to ensuring that growth continues to be delivered in a sustainable and measured way that benefits the environment, communities and economy of the borough.

2.1.2   The Council has identified four core objectives underpinning the review, these are:

1.   Employment led growth through **inward investment and job creation.**
2.   A **'Forest Community'** approach which affords the **protection, enhancement and accessibility of the natural environment and green spaces that characterise the borough.**
3.   Support for **regeneration of our borough towns, new town estates and infrastructure.**
4.   Meet local housing needs including providing more **affordable and specialist accommodation** to support people to live longer and healthier at home.

Wrekin Forest

2.1.3   The review provides the Council with a means of proactively addressing the economic challenges we currently face. The Government has recently published a consultation White Paper setting out proposals for changes to the planning system in the future. However the outcome of this is unclear and could take some time to be determined and implemented. The Council is continuing with the review as a delay at this stage would detrimentally affect the borough's ability to 'bounce back' post-recession. It would also lead to a position where the Council could not respond positively to inward investment opportunities, thereby missing vital opportunities to create new jobs and could be left in a position where the Council is unable to resist speculative development proposals.

2.1.4 Telford Development Corporation planned infrastructure to accommodate a population of 225,000 for Telford. The current population of the borough is 179,850 and this next phase of growth will see the borough, and Telford in particular, start to reach its full economic potential but in a measured way.

2.1.5 A priority for the review and the TWLP going forward will be to balance the need for growth with protection of the borough's green space. The uniqueness of Telford is characterised by the extent of publicly accessible green space including Local Nature Reserves, Wildlife Sites, Green Guarantee sites and the 'green network' in Telford and Newport. The review will provide an opportunity to reinforce the protection of existing green space, ensure that communities continue to be able to enjoy accessible greenspaces as well as to create new ecologically valuable areas through new development that can positively contribute towards tackling climate change.

2.1.6 The purpose of a review is to take account of "*changing circumstances affecting the area, or any relevant changes in national policy*" [1]. The borough needs to comply with Regulations [2] and ensure its Local Plan is up-to-date and in conformity with the revisions to the National Planning Policy Framework, 2019 (NPPF).

2.1.7 Commencing a review provides an opportunity to embed Council and Community priorities for the borough and pro-actively:

- Respond to the Council's declaration of the Climate Change Emergency by ensuring new development plays a 'front and centre' role in meeting the call for a carbon neutral borough by 2030;
- Reflect the Council priorities [3] to 'protect, care and invest' in Telford and Wrekin and use them as a basis for updating the Local Plan vision, aims and objectives.
- Protect and enhance the borough's wealth of green spaces through investment in new areas of biodiversity and the natural environment;
- Meeting the housing needs of our borough including providing choice and homes that will support people to live independently at home;
- Ensure the Local Plan is central to supporting the Council's Covid-19 recovery strategy and ensuring all communities benefit from growth;
- Address the changing face and role of local, district and town centres and new town housing to help build stronger communities that are economically, socially and environmentally resilient;
- Ensure that we have the employment land supply to compete for inward investment, support growth, diversify the economy and create jobs; and
- Secure investment in transformational infrastructure projects that will help promote Telford's role as a regional centre for leisure, tourism and business.

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1   Paragraph 33, National Planning Policy Framework, 2019
2   The Town and Country Planning (Local Planning) (England) Regulations 2012.
3   Telford & Wrekin Council: 'Our programme to protect, care and invest in our borough', 2019

What is the Local Plan

The Local Plan is the adopted Development Plan for the borough, it is central to delivering plan led growth and is the starting point for assessing planning applications. The Local Plan forms the main part of the borough's 'Development Plan'. The Local Plan is formed of two parts;

1)   A set of development management policies which all planning applications are assessed against; and

2)   A set of housing and employment sites allocated for development.

The borough's Development Plan also includes Neighbourhood Development Plans (NDPs) which provide additional policies set at a Parish or Town Council level which respond to more local circumstances. The following areas currently have NDPs; Waters Upton Parish, Madeley Town Council, Edgmond Parish Council, Newport Town Council and Lilleshall Parish Council.

The Local Plan was adopted in January 2018.

Once adopted, the reviewed Telford & Wrekin Local Plan will be the development plan by which all future planning applications will be determined (alongside the NPPF and locally prepared Neighbourhood Development Plans).

The plan (as reviewed) will supersede the version adopted in January 2018.

2.2 Wider planning framework for Telford & Wrekin

2.2.1   The Local Development Plan plays a key role in identifying the requirements for growth, locations suitable for growth as well as the policies that help shape growth. This is not done in isolation, but is part of a wider framework of plans and policies for the delivery of services, infrastructure and growth within the Council as set out below.

Local Development Plan

Local Transport Plan →	Sets the strategic direction for transportation and highways policy in the borough. Informs Highways and Transport policy direction and infrastructure priorities
Housing Strategy →	Sets the Councils priorities for meeting the housing needs, including supported and specialist accommodation, of the borough. Informs housing policy direction.
Health & Wellbeing Strategy →	Informs multiple policy areas that link to health and wellbeing including sustainable travel, design, natural environment and housing.
Climate Change Action Plan →	Sets Council priorities for meeting the challenge of climate change. Informs policy direction across a number of areas including transportation, design and environmental resources.
Economic Development Strategy →	Sets the Councils strategy for maintaining business resilience, attracting inward investment and driving growth. Informs policy direction around employment land, centres and tourism.

2.2.2   The TWLP is a corporate plan that impacts on a range of other Council services who have and will continue to be engaged in the review. These services include, but are not limited to:

- Education
- Neighbourhood Services
- Drainage
- Leisure & Culture
- Public Protection
- Waste Management

2.3 Changes to the National Planning Policy Framework

2.3.1   The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England including a framework for producing local plans. The NPPF was updated in July 2018 and February 2019. In order to maintain an up to date Development Plan it is important for the Council incorporate those changes into the Local Plan.

2.3.2   The NPPF requires local plan policies to be reviewed at least every five years from the date of adoption, and updated as necessary thereafter.

2.3.3   Several changes have been made to specific topics these include revisions to the affordable housing definition and policy requirements, requirements for identifying land and making effective use of land, and emphasis on achieving well-designed places through clear design vision and expectations in local plans. The detailed changes that influence proposals in this Issues & Options document will be addressed in the relevant policy sections below.

2.4 Government planning consultations

2.4.1   The Government published the consultation 'Planning for the Future' White Paper on 6 August 2020. The consultation document proposes to reform the planning system in England, to streamline and modernise the planning process, improve outcomes on design and sustainability, reform developer contributions and ensure more land is available for development where it is needed.

2.4.2   The consultation covers a package of proposals including plan-making, development management, development contributions, and other related policy proposals. Several changes are proposed to the form and content of local plans which include setting out clear rules for development, identifying site and area-specific requirements, alongside a greater focus on design quality at the local level. The current system of planning obligations is also proposed to be reformed as a nationally set, value-based flat rate change, with a single rate or varied rates set.

2.4.3   The Government is also separately consulting on several changes[4] to planning policy and regulations proposed to be made in the shorter term the four main proposals are:

- Changes to the standard method for assessing local housing need.
- Securing of First Homes through developer contributions.
- Temporarily lifting the small sites threshold.
- Extending the current Permission in Principle to major development.

2.4.4   Consultation on these changes closed on 1 October 2020 and consultation on the White Paper closes on 29 October 2020. At this stage there is no certainty around what proposals will be carried forward and when they will be implemented; however, the consultation emphasises the importance of Local Plans and ensuring these are in place and up-to-date. It is therefore appropriate that the Council proceeds with the review of its Local Plan and monitors the consultation outcome. Changes that are adopted via legislation will be considered as part of subsequent stages of this review.

2.5 Changes to permitted development rights

2.5.1   The Government has introduced legislative changes which include extending permitted development rights for residential development to allow the demolition of commercial and/or residential and building residential in its place[5]; and for adding storeys to buildings to create residential floor space[6]. There have also been significant changes to the Use Classes Order[7] which allow greater flexibility to change uses within town centres through three new broad use classes. These legislative changes were introduced during August and September 2020 and will therefore inform future stages of the review.

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4   Changes to the current planning system: Consultation on changes to planning policy and regulations, 2020.

5   The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 3) Order 2020.

6   The Town and Country Planning (General Permitted Development) (England) (Amendment) (No. 2) Order 2020.

7   The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.

3 What does the Issues & Options document cover?

3.1 Introduction

3.1.1   This consultation covers the Issues & Options stage of the review of the adopted Telford & Wrekin Local Plan (the Local Plan). The review will ensure the Council maintains an up to date Local Development Plan by:

- Incorporating any changes in the NPPF since the adoption of the Local Plan;
- Ensuing it reflects Council priorities for the borough;
- Addressing any other relevant legislative or regulatory changes that the Local Plan needs to take into account;
- Takes account of any changes in international, national and local circumstances that would affect the growth of the borough; and
- Ensuring the Council maintains a supply of land to meet its development needs into the future.

3.1.2   This Issues & Options document sets out proposed changes to the Local Plan including:

- The proposed extension of the Local Plan to 2040;
- Proposals for refocusing of the vision and aims of the Plan;
- Proposals for amending development management policies within the plan;
- Options for meeting the borough's development requirements up to 2040; and
- The proposed methodology for selecting new development sites within the borough.

3.1.3   The document is structured into nine sections with supporting appendices. These include:

Section 1 Introduction

This section provides a brief explanation of the role of the Local Plan and the contents of this Issues and Options consultation document.

Section 2 Why are we reviewing the Local Plan?

This section covers the key drivers for the review including strategic and local issues that the review will need to consider as well as a summary of legislative changes that will need to be picked up as part of the review.

Section 3 What does the Issues & Options document cover?

This section details the extent of the document and its chapters.

Section 4 Performance of the adopted Plan

This section summarises the contribution the Local Plan has had to the borough's economic, housing and environmental performance.

Section 5 Development of the Vision and Strategy

The review of the development vision for the borough and proposed strategic priorities are covered in this section.

Section 6 Development requirement options

This section sets out options for the borough's employment and housing land requirements.

Section 7 Distribution of growth

This section sets out options for the distribution of growth between Telford, Newport and the rural area.

Section 8 Review of development management policies

This section sets out proposals for the Local Plan's development management policies including changes to policy as a result of new legislation, changes in circumstances and as a result of new priorities.

Section 9 Next steps

The final section addresses the next stages of the review process including the Council's approach to matters such as the Duty to Cooperate.

3.1.4   This is a review of the Local Plan and where appropriate it will be the Council's preference to:

- Use existing evidence where this is deemed up to date and remains relevant to any proposals; and
- Where necessary source additional evidence to support any proposals contained within the plan.

3.1.5   The flow chart below sets out the role of the Issues & Options document in relation to other stages of the review.

Issues & Options Document

Sets out broad options for policy and growth strategy as part of the review of the Local Plan. This process informs the development of the Council's preferred strategy for growth and development management policies.

Preferred (Draft) Strategy Version

Following consideration of consultation responses this is the draft Local Plan and includes proposed changes to development management policies and the Council's preferred development strategy (including land allocations).

Publication Version

Following consideration of consultation responses from the Preferred Strategy Version, a further version of the Plan is produced by the Council. This Publication Version is then subject to a final period of public consultation.

Submission and Examination

The Publication Version accompanied by all the comments received during the last stage of consultation are submitted for independent Examination to the Secretary of State.

Adopted Version
Following Examination the plan is then presented to Full Council for adoption.

Performance of the adopted Plan

4.1 Introduction

4.1.1 An important aspect of this Local Plan Review is to understand the performance of the current, adopted Local Plan. Set out below is a summary details the contribution of the Local Plan on the boroughs economic, housing and environmental performance.

Economy in Telford and Wrekin

Business 'births' **+5.5%** (2018)

Wages **+7.9%** (2019)

GVA **£4.89bn** (2018)

Successful partnership with Harper Adams University to develop **Ni Park**

Delivery of **100 more 'local units'** for businesses in 2019

Wellington Civic Centre & Telford Offices

Growing our own businesses

4.1.2   The Council has supported local businesses to grow within the borough from assisting with grant applications such as through the Business Growth Programme (BGP) and the Business Energy Efficiency Programme (BEEP) to assisting with recruitment of local people. The Local Plan helps support local businesses to expand and grow by providing land for investment and framework for decision making.

Flower & White	Delivery of BGP grant funding **worth £72,000**	Assistance with recruiting **local talent**
Rosewood Pet Products	15-year lease of **68,000 square foot** warehouse and office building	
Bridge Cheese	Nearly **£150,000** of BGP grant funding	**15** new jobs created
Fabweld Steel Products	Awarded **£30,000** from the BGP	**£7,000** BEEP grant
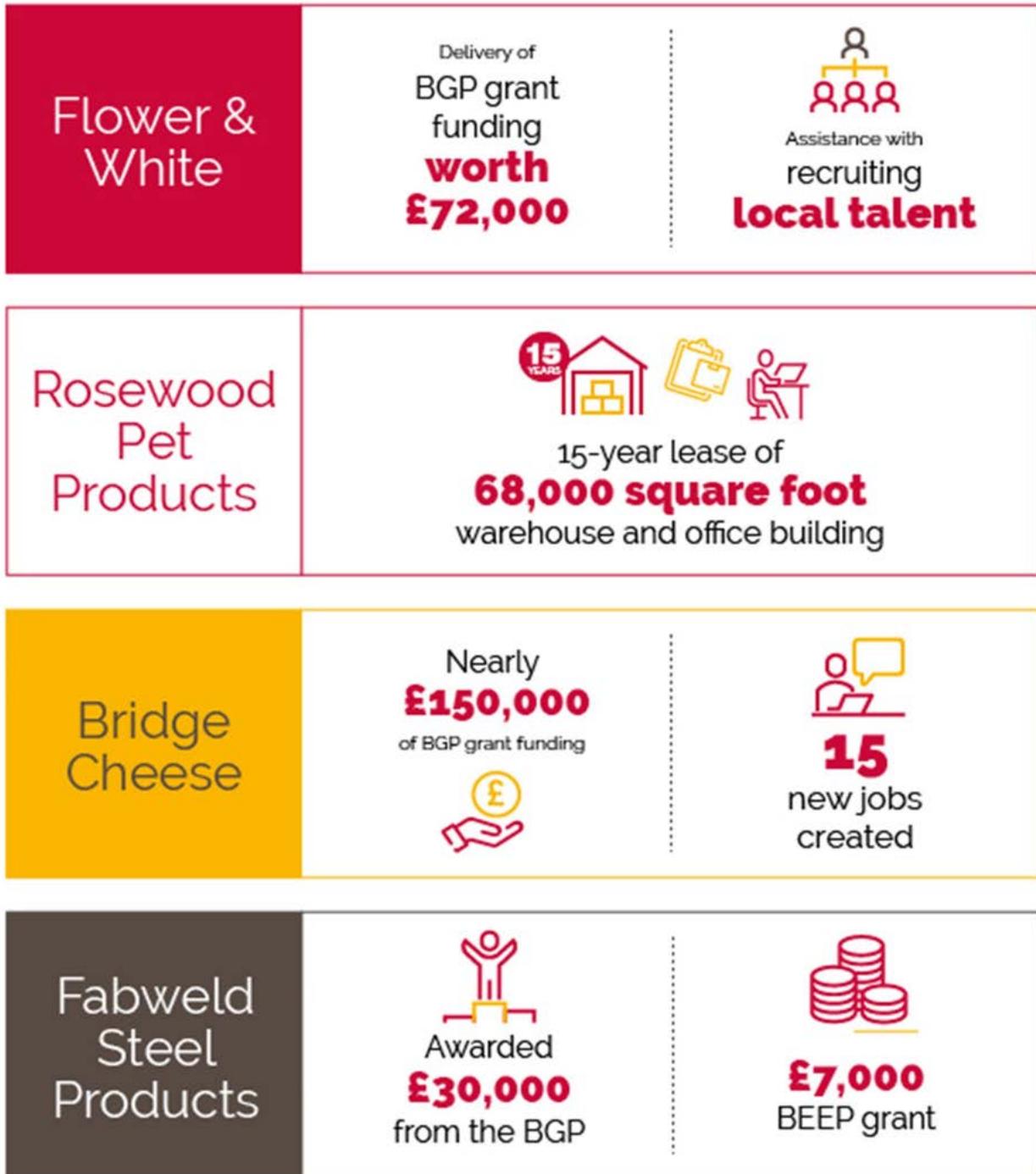
Supporting investment in the borough

4.1.3   The Telford Land Deal has been extremely successful. The Local Plan has aided this success through the allocation of land for employment and housing development. Through the Land Deal alone up to the end of 2018/19 the following had been secured:

Attracted private sector investment of over **£200 million**

617 new homes

COUNCIL TAX

Will generate Council tax of £760,000 pa (approximately)

BUSINESS RATES

Will generate business rates of £1.75m pa (approximately)

£43m investment to date through the **Growth Fund**

15 new **incubation units and grow on space** for small companies

21 new commercial sites = **1,114 jobs**

4 commercial sites and 5 residential sites are due to be delivered in 2019/20 which will deliver a further **375 jobs, 144 new homes**

Green Space

Approximately **75%** of the urban area is composed of green space

+27 local green spaces designated in 2018 – 2019

Protected **200** Green Guarantee Sites

Accelerated the delivery of **17 Local Nature Reserves**

89% of households within 300m of accessible natural greenspace

Telford & Wrekin's **Green Network extends to over 2500ha**

£52,000 investment through the **Green Guarantee**

Retained and protected **over 1000ha** of locally important green spaces

The Wrekin & Coalbrookdale Viaduct

Housing

76% of allocated housing has been built or has permission.

Over 300 affordable homes delivered per year.

Support over 300 people per year to continue to live independently at home

65% increase in specialist and supported housing over the past five years.

Provide advice and support to over 3,000 people each year working to prevent or relieve homelessness

Housing Completions Since 2011

Actual net completions
TWLP annualised housing figure (864)
Average net completions 2011-19 (1,008)
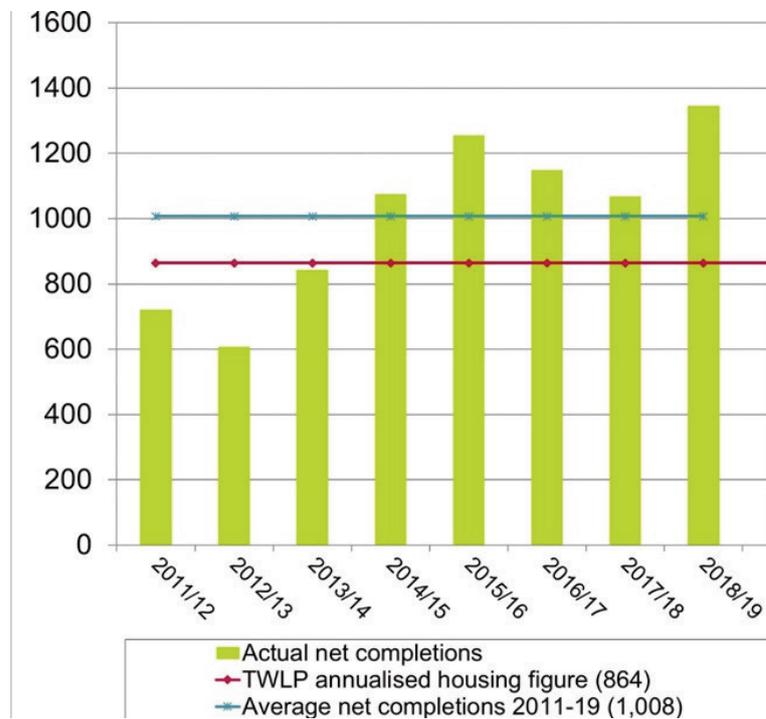
5 Development of the Vision and Strategy

5.1 Development Vision

5.1.1   The development vision for the borough needs to be updated as part of the review. This is to accommodate and reflect the changing context and acknowledge the work that needs to be done to create a better borough for the future. The vision will set the direction for the Local Plan and be informed by the Council's development priorities. The updated vision needs to take into account the changes since the production of the Local Plan.

5.1.2   The diagram below sets the development vision within the framework of the plan and how it will inform the priorities and feed through to the spatial strategy and development management policies.

Development Vision
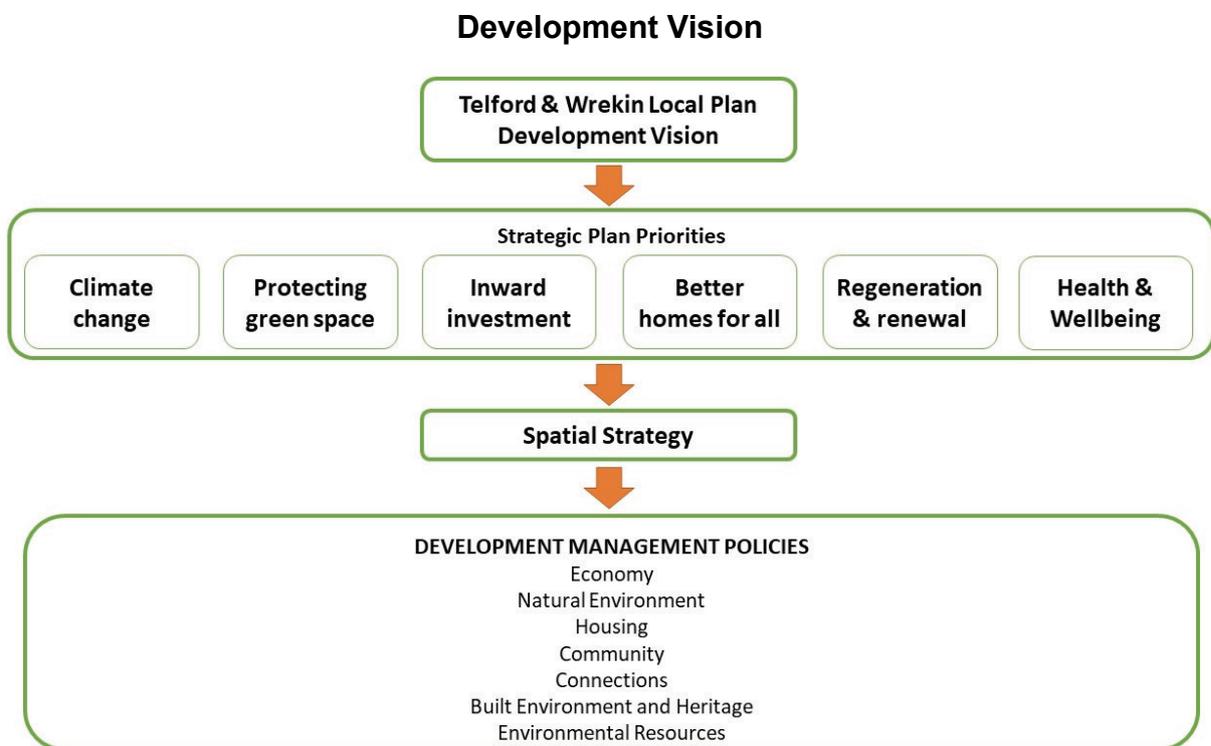
5.1.3   The principal proposed change in the diagram above is the replacement of the aims and objectives of the Local Plan with a proposed set of six focused 'strategic priorities'. The strategic priorities are key areas for the borough and the reviewed plan will make clear how they will be addressed through spatial strategy and development management policies. They will act as 'golden threads' through the document and all policies will be reviewed to maximise the contribution they can make to achieve these priorities and overall development strategy.

5.1.4   The proposed strategic priorities are set out below including a summary of the issues they are looking to address and proposals for how the plan contributes towards meeting them:

1. Tackling climate change and achieving carbon neutrality

What is the issue?

The Council declared a climate emergency on 25th July 2019. The declaration committed the Council to carbon neutrality for its own operations by 2030. The declaration also recognised that the Council has a role to play in helping to facilitate the aspiration for the borough to be carbon neutral by 2030. The UK legal target is now net zero emissions by 2050.

The Council's Climate Change Action Plan identifies ways to use its powers to support the transition to a low carbon future, such as through land use planning and the provision of infrastructure. Included in the action plan is the review of the Local Plan to develop robust policy that supports and promotes a move to carbon neutrality, through consideration of how development will need to adapt to the impacts of climate change and promote opportunities to maximise carbon sequestration.

How can the plan address this priority?

5.1.5   Development has a role to play in supporting a climate neutral borough through planning policy, investment in infrastructure, the quality of development and changes in current practice. This will require joint effort and working between the public, private and third sectors. The Council will work to influence all of these areas by:

- Embedding carbon neutrality in new developments over the coming years;
- Maximising the green estate and quality of the natural environment in combating climate change;
- Recognising the changes in the way we will build, live, work and travel;
- Securing more reliable, local energy generation at lower cost; and
- Laying a clear policy framework for networks will need to help combat climate change.

5.1.6   Key areas where the plan can support this priority include:

- **Renewable energy** – The delivery of renewable energy schemes will be a growth area for the borough as it provides opportunities for clean 'on-site' energy generation, reliable energy supplies to businesses and an opportunity to reduce energy costs for home owners. The Local Plan can achieve this strategy through renewables on new development proposals and seek to allocate sites for renewable energy projects via the call for sites process.
- **Sustainable transport** – The borough has an extensive network of walking and cycling routes, bus services and good connections by train. There has been an increase in people walking and cycling as a result of Covid-19 especially in the areas they live and now is the moment to capitalise on this by providing a policy framework for further investment in sustainable travel.
- **Electric vehicles and electric vehicle infrastructure** – The Local Plan can help deliver a 'network' of charging points across the borough in residential and commercial development and could plan accordingly to future proof sites, for example the installation of ducting and cabling.
- **Design of development** – One of the biggest contributory factors to climate change in the UK is buildings. The fabric of buildings needs to be addressed as part of the review as a means of reducing this figure locally and ensuring that homes are future proofed.
- **Green industry** – A key area for the Local Plan will be the provision of new employment land which could be targeted at the green industry both as a growth economic sector and

as a means of providing local production to help transition the borough to a low carbon economy.

- **Advanced methods of construction (AMC)** – A strategy that encourages and supports AMC in the Local Plan offers several benefits including:

1. Delivery of high quality sustainable homes that are designed to address climate change;
2. Opportunities for local manufacturing, assembly and supply chain;
3. New training and employment opportunities in manufacture and onsite assembly; and
4. A chance to grow the market locally and get ahead of the competition.

- **Flooding and drainage** – The recent floods along the River Severn have demonstrated the adverse nature of climate change. The Local Plan can play an increased role in supporting measures such as natural flood water storage as a means of reducing flood risk to property and support the management of water as a strategic resource that can provide environmental, social and economic benefits.

Low Energy Street Lighting

2. Protection and enhancement of green and natural environment

What is the issue?

This is a core local priority that goes to the heart of the review. This is about protecting and enhancing the borough's existing assets, recognising the increasing importance these inter-connected areas have played in recent months supporting public health and supporting Telford to grow in a balanced way. Unplanned erosion of green space especially within Telford will reduce the sustainability, climate resilience and liveability of the town. These green areas also provide separation between communities and prevent urban sprawl. The borough's green spaces are valued by residents, visitors and investors and a key part of the borough's attraction.

How can the plan address this priority?

5.1.7   The Council is a significant land holder in the borough and has control over many of the areas of green space so can play an influential role in achieving this priority. The role of the Local Plan moving forward will be to ensure that these spaces, continue to provide access to the natural environment for new and existing residents.

5.1.8   Key areas where the plan can support this priority include:

- **Forest Community –** Telford was designed as a 'Forest City'. This approach set out to create 'a settlement in the landscape', a town set within a network of amenity green space defined by a comprehensive tree and woodland structure. The review provides an opportunity to re-imagine and further the concept for the 21st century establishing the borough as a 'Forest Community' with a development strategy that protects, manages and enhances the borough's greenspaces supporting stronger communities and contributing to action to address climate change and declines in biodiversity.

- **Protection of inner urban green spaces –** The Council will identify a further programme of Local Nature Reserve sites across the borough including within Telford. The review will also include policy proposals for the borough's formal parks, including Telford Town Park, to allow the Council to strictly control development and provide the highest level of protection to these assets. The review will recognise the interconnected nature of the borough's green spaces and the role they play in providing; access to the natural environment, the movement of people through them and importantly their role in allowing biodiversity and species to move around the borough.

- **Investment into biodiversity and green space –** To help achieve the protection enhancement of green spaces and the natural environment the Local Plan will incorporate changes to national regulations including biodiversity net gain, nature recovery networks and Great Crested Newt Licencing. These measures will support investment in the natural environment and improve the quality of the green areas and the routes connecting them while enabling sustainable development.

- **Urban greening –** The natural environment does not have to be a distinct and separate entity from the built environment. Urban greening will be a key element of designing developments that are contribute towards carbon neutrality and are climate ready. These proposals will include the increased use of green infrastructure in developments to help reduce energy costs, help with carbon sequestration and improve the health and wellbeing of residents.

- **Quality of green space –** It may be necessary to bring forward proposals that include some green field development. This would provide climate change benefits. Development can provide new areas of natural green space such as grass land, opportunity for tree planting and the creation of biodiverse habitats where they were previously limited to hedgerows.

Telford Town Park

5.1.9   The Forest Community approach will strengthen and celebrate the existing links between people, place and the natural environment:

People – Develop stronger communities by enhancing peoples' contact with nature, maximises the natural environments positive impacts upon health and well-being and addresses inequalities in physical, social and cultural accessibility to green space.

Place – The 'Forest Community' will frame future place making within the borough, building upon the town's green legacy.

The natural environment – The 'Forest Community' will harness the power of its green network to address the climate and biodiversity crisis: combating air pollution, storing carbon, cleaning and cooling the air, alleviating flooding and supporting nature recovery.

The Forest Community Definition

The Council is exploring two potential definitions of 'Forest Community' as part of the borough vision:

 Proposal 1:

'For vibrant, growing and diverse communities living healthy lives and having meaningful relationships with nature in high quality woodlands and green spaces across the borough. For communities which are taking meaningful action to address climate change and valuing the range of habitats and species present locally.'

Proposal 2:

'For vibrant, growing and diverse communities sitting comfortably within the mosaic of high quality woodlands and greenspaces of the borough. For communities actively adapting to climate change and working to support nature recovery and resilience.'

Question 1

Which proposed definition of the Forest Community do you prefer? Are there any other aspects to the Forest Community you would like to see considered within the definition?

3. Maximising inward investment and employment opportunities

What is the issue?

The borough's economic growth rate is exceeding both the West Midlands and England with GVA increasing by 6.6% compared to 4% and 3.1% respectively. Growth has also been consistent with year on year increases in GVA since the 2008 recession.

The borough is a key economic powerhouse for the Marches LEP area and is as a gateway location between engineering/technology and food production and processing firms, and an important logistics and distribution hub[8]. Through its emerging Economic Development Strategy the Council will look to support local businesses to capitalise on local industrial and trading heritage by encouraging R&D, innovation and higher/new skills to give competitive advantage and provide a sustainable future.

The Council has a key ambition to support inward investment as a means of growing job opportunities and it is really important that the strong economic performance of the borough is sustained and enhanced. The borough is facing several challenges that the Local Plan can help address:

· The need to maintain economic competitiveness;

· The need to provide growth and diversification opportunities for key economic sectors including manufacturing;

· Accelerating the borough's post Covid-19 recovery;

· The implications of the UK's withdrawal from the European Union;

· Diversifying the economic base;

· Positioning Telford to capitalise on benefits of new trading relations;

· Regional and national infrastructure opportunities including; High Speed 2 which will call at Stafford, the M54 / M6 northern link, plans for a Western Motorway bypassing the conurbation, I54 extension and proposals for RAF Cosford; and

· Emerging infrastructure opportunities such as the potential for the electrification of the Shrewsbury – Telford – Wolverhampton railway.

8   Marches LEP - Strategic Economic Plan (2019).

The pandemic has disrupted the pattern of global trade and led to the temporary closure of many businesses. This unprecedented period has seen a number of changes that will impact on the review:

· **Home working -** This will have an impact on the commercial office market and will drive changes in the way people work and where they work. Reduced demand for office space may have an impact in the Telford Town Centre area as well impacting on the space required in new homes.

· **Industrial sectors** - There has been a significant impact on manufacturing across a number of sectors such as aerospace and automotive as demand in these sectors has reduced. Other sectors including food processing have grown and there are also opportunities from companies seeking to source more local supply chain.

· **Transport** - Demand for public transport has been impacted as a result of furloughing and working from home. There has been an increase in the proportion of people walking and cycling.

· **Leisure and hospitality** – These sectors continue to be impacted by the pandemic. This has seen a need to maintain social distancing in venues and a fall in visitor numbers.

How can the Local Plan address this priority?

5.1.10   There are a number of ways in which this priority can be addressed:

- **More land for employment** – The review will enable the Council to identify more employment land supply in order to meet economic growth and provide new employment opportunities.
- **Existing employment sites** – There are some employment sites outside of existing Strategic Employment Areas (SEA's). These sites should be afforded similar protection for employment uses because they are strategically positioned close to major highways including the M54 and they provide employment opportunity within Telford and Newport with good connections to existing residential areas.
- **Infrastructure investment** – The identification of employment and housing land supply means that the Council is in a better position to plan for new infrastructure with more certainty. Developer contributions can be targeted towards infrastructure that is needed to support development. There is a need to broaden the type of infrastructure that contributions support.
- **Supporting education, training and skills** – The borough cannot compete for inward investment unless it invests in education, training and skills of the workforce. The Council will be planning for additional education infrastructure that will be required to support development including the provision of primary and secondary school places. The Council will also work with Further and Higher Education providers to understand their development aspirations.
- **Diversifying the rural economy** – The rural economy has traditionally delivered employment in the agricultural sector, small scale business and in the past manufacturing related to the food industry. The largest rural employer is Harper Adams University who are world leaders in the agri-tech sector. The Local Plan can help diversify rural employment opportunity in areas such as leisure and recreation which are seeing an increase in popularity as more residents seek to visit and explore what the borough has to offer.

4. Securing better homes for all

What is the Issue?

A decent place to live is the foundation on which people build their lives. The Local Plan has a key role to play ensuring the delivery of new homes that meet local need and supporting changes including regeneration and renewal that address the quality of the existing housing stock. As well as ensuring delivery of more affordable homes there is a recognised need to ensure that housing in general is developed to a more accessible standard that enables people to live at home for longer as this not only reduces pressures on health and social care services but more importantly improves quality of life and life expectancy.

One of the key impacts of Covid-19 has been the increase in people working from home. This is likely to be a long term trend and needs to be considered as part of the review both in relation to standards in new homes and the design and community provision within new developments.

How can the plan address this priority?

5.1.11   The Local Plan can address this priority by considering:

- **Better housing mix** – Delivering a range of housing types, tenures and sizes to meet the needs of various groups in the community is central to the Local Plan. This includes building more affordable homes and specialist accommodation including bungalows in accessible locations which can be adapted to meet changes in people's needs over their lifetime and reduce pressures otherwise placed on residential care facilities.
- **Space standards** – The Local Plan can help further improve borough housing standards through design, accessibility, security and environmental performance, taking account of national guidelines and evidence. Seeking minimum space standards for a range of housing types and tenures (including homes for rent) and outdoor amenity space contributes to safe, inclusive and accessible places which are more responsive to the changing requirements of residents[9] including home working.
- **Housing offer** - The right balance of good quality homes, which are affordable, sustainable and provide variety, choice and accessibility to residents, are essential to the economic prosperity, health and wellbeing of the people in the borough. Local Plan policies and site allocations can instil principles of intergeneration, co-location and interaction in our future communities.

5. Delivering regeneration, renewal and stronger communities

What is the Issue?

Telford hasn't been immune to the challenges facing many former new towns not least the need to regenerate and renew infrastructure, centres and housing stock. Telford's growth has been characterised by new development connecting many older communities and

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9   Living with beauty: report of the Building Better, Building Beautiful Commission (2020)

creating new communities with district centres and residential areas. The challenge of regeneration is compounded by the changing role of centres as traditional patterns of shopping and spending leisure time are changing. Telford Town Centre is also not immune to these forces and the Plan needs to consider the need for a greater mix of development within centres including residential, leisure and employment.

The infrastructure and fabric of the new town estates to the south of the M54 is ageing and some of the estates now require physical regeneration. This is complicated by diverse ownership in these areas.

How can the plan address this priority?

5.1.12   The Local Plan can address this priority by considering:

- **Telford Town Centre** – The continued evolution and development of Telford Town Centre can be supported through allocating development sites as well as a policy framework that recognises the changing nature of town centres and the need to have a balance of uses. This includes public services, leisure uses and delivering an appropriate amount and range of new residential development in the town centre which supports creating stronger communities. The review can set the tone and shape of redevelopment in the town centre up to 2040.
- **Town and District Centres** – There is recognition that a changing retail environment will require re-purposing of town and district centres. For example, there will be opportunities to refocus retail areas and utilise empty retail spaces, create new enterprise space and bring in other uses such as residential development, redesign the public realm, repurpose landmark buildings and add to the night time economy. Centres are well connected places and improved walking and cycling links will help encourage people to 'shop local'.
- **New Town Estates** – The Council's Stronger Communities programme will focus on areas of the borough that are in need of physical regeneration, including New Town Estates. Recognising there may be limited scope for site allocations in these estates a policy framework is proposed that will help facilitate redevelopment and regeneration opportunities.

Telford Town Centre

6.   **Improving health, wellbeing and tackling health inequalities**

What is the issue?

By promoting healthy behaviours and environments through planning policies, communities and businesses can help reduce health inequalities, improve productivity and economic growth and also protect our residents through better physical and mental health and wellbeing.

Factors that contribute to poor health and health inequalities including property standards and development design, access to outdoor (public and private) amenity space and access to healthy food, opportunities for education, exercise and employment.

How can the plan address this?

5.1.13   The Local Plan can address this priority by considering:

- **Mental and physical health of residents** – Both climate change and the impact of Covid-19 have highlighted the importance and value of high quality, locally accessible green spaces for exercise, education and both physical and mental health and wellbeing. The Local Plan can play a key role in improving people's overall health through design policy and space standards, for example, the provision of space within homes to accommodate home working as well as the size of outdoor space such as gardens. The Local Plan can also encourage healthy active lifestyles by providing opportunities for people to exercise more through walking and cycling connections to well-designed work places and centres which provide supporting infrastructure. Together with neighbourhood access to outdoor space and the natural environment, these measures can promote community connectivity, social interaction and reduce community isolation. A whole systems approach to reducing levels of obesity and excess weight across the borough should consider healthy food environments that support better choices for people.
- **Healthy and vibrant town centres** – The decline of retail within town and district centres poses a challenge in how to re-purpose centres and bring back footfall. This issue is not unique to the borough. The Local Plan will need to consider what other uses could be brought into centres, the need to control uses, but also the need to maintain some flexibility so that opportunities for positive, good quality economic development are not lost. This will be central to ensuring that the borough's centres are busy, social places that contribute to the health and wellbeing of residents

Question 2

Do you agree with the proposed priorities for the Local Plan up to 2040? Are there any other priorities the plan should focus on?

6 Development requirement options

6.1 Introduction

6.1.1   The Council is required to plan for and maintain a supply of land to meet its development requirements. This should take full account of the area's aspirations, priorities and potential for growth. It is not a credible or defendable position for the Council to plan for growth well below its current housing requirement or rates of delivery as this would put the borough at risk of unwanted speculative development as well as Government sanctions should the Council fail to meet the Housing Delivery Test [10].

6.1.2   The Plan needs to ensure a supply of employment and housing land for the following reasons:

- Providing a range employment land opportunities is critical to attracting new inward investment;
- Failure to maintain a five year housing land supply and meet the Government's Housing Delivery Test will risk exposure to unplanned speculative development; and
- Planned growth allows for a strategic approach to infrastructure planning and to develop strong, resilient communities.

6.1.3   This section sets out the options for employment and housing land requirements. The evidence base for the Council's employment and housing requirements is provided through the Economic & Housing Development Needs Assessment (EHDNA). The Scoping Report for the Integrated Appraisal provides baseline information for the Integrated Appraisal of the plan. These documents are published alongside the Issues & Options consultation document.

6.1.4   The Council is currently carrying out a call for sites which closes on 8 January 2021. This process will inform the Council's land supply position. The Council is therefore taking an open approach to the Issues & Options consultation and will consider other reasonable alternative development strategies (development requirements and distribution options) that are supported by appropriate technical evidence and suitably justified.

6.1.5   It should be noted that the Issues & Options document does not identify specific development sites. Proposed site allocations will be included within the Preferred (Draft) Strategy Version.

6.2 Existing land supply

6.2.1   The Council's existing land supply, as at April 1 2020, includes sites (in the case of employment land) and homes that include:

- Existing land allocations – these will be carried forward as part of the Council's land supply;
- Have planning permission but are not yet started;
- Are under construction; and
- Have been completed.

6.2.2   The Council will update the supply position for employment and housing land on an annual basis as the review progresses.

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10   Page 21, Paragraph 75, National Planning Policy Framework (2019)

6.3 Employment land requirement

6.3.1   The Local Plan allocated 148.5ha of employment land to cover a minimum requirement of 76ha. Over 100ha of this employment land is either completed or in the planning system. Much of this land is under delivery in Telford (e.g. T54 and Hortonwood West) with a further 10ha under development as part of the Newport Innovation Park agro-tech development site. This currently leaves a balance of 48ha of land supply through which the Council can positively respond to inward investment enquiries. The successful delivery of employment land:

- Demonstrates demand for employment land and strong investment interest in Telford.
- Is a clear indication of the success of the Council's approach to allocating supply, promoting the borough to investors and de-risking and preparing sites for the market.

Telford Plaza

6.3.2   The employment land requirement options are based on two scenarios:

1. Economic growth – a 'growth' scenario which is informed by economic forecasting data and discussions with a range of stakeholders including Council officers and key stakeholders including the Marches Local Enterprise Partnership and representatives from across the business community.
2. Past trends – a scenario based on past delivery trends for employment land.

6.3.3   The table below sets out the two options with the economic growth option providing 167ha of employment land and the past trends option of 189ha. When existing employment land supply is taken into account the net new employment land is required as part of the review process is between 77ha and 99ha.

Table 1: Employment Land Requirement

	Economic growth (ha)	Past trends (ha)
Employment land requirement	167	189
Current employment land supply [11]	90	
Net employment land requirement	**77**	**99**

The **Call for Sites is currently open and the Council is seeking submissions for new employment land.** Further information is available and submissions can be made at www.telford.gov.uk/callforsites.

6.3.4   The Council will be looking for employment land supply that will provide choice, flexibility and range of sites that can meet inward investment enquiries.

Question 3

Which of the two employment land requirements set out above do you think the Council should be adopting? Do you have a different figure, supported by evidence, which Council should be considered?

6.4 Housing requirement options

6.4.1   The EHDNA study has informed three options for housing growth in the borough. In developing options the Council has recognised the potential for additional growth arising from economic development and demographic changes.

6.4.2   The Government set a minimum housing needs figure through its standard method. The current figure for Telford is around 500 homes per year. However it is not considered a defendable position to rely on this figure as part of a Local Plan examination process as based on the area's past delivery and economic priorities it is highly unlikely this position would be accepted by a Government Planning Inspector. The Government is clear that this is the starting point (not the end point) for planning for growth.

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11   Sites with planning permission (not yet commenced construction) and allocated sites within the TWLP

6.4.3   The Government is consulting on changes to the standard methodology for the calculation of housing need[12]. Should this change be implemented the housing need figure for Telford & Wrekin could be 941[13]homes per annum. The Council will be keeping the situation under review and will respond accordingly at the next stage of the TWLP review.

6.4.4   Based on the EHDNA findings, three scenarios for housing growth are set out below:

1. **Meeting economic growth**

- This scenario is based on meeting economic growth needs of the borough and is supported by evidence from local stakeholders including Council Officers, the Local Enterprise Partnership and business community.
- This scenario does not plan for meeting population projections and does not provide scope for additional economic growth.
- This scenario is below current TWLP growth targets and would be below recent rates of delivery.
- This scenario would continue to deliver affordable housing from new developments.
- The scenario uses employment growth forecasts to estimate likely population growth.

2. **Meeting economic growth ambitions and population trends**

- This scenario is based on Office of National Statistics population projections for 2018.
- It provides housing required to meet the Council's economic growth ambitions through meeting the economic growth needs (Scenario 1) as well as providing additional scope for economic activity linked with recovery and the changing market and provides scope to attract inward investment through more flexibility in the labour force as a result of meeting future population projections.
- This scenario is broadly in line with the average annual rate of housing completions in the borough since 2011.
- This scenario could deliver proportionally more affordable housing from open market sites than current levels.

3. **Housing led growth**

- This scenario is based on the delivery of a number of homes each year with supporting demographic information to evidence the population growth required to deliver housing at this rate.
- By way of comparison this scenario is broadly in line with the best performance of the housing market over the previous 5 years.
- The scenario demonstrates the implications of delivering a housing led growth strategy for the borough with the implication of higher inward migration.
- This scenario allows for economic growth and supports projected population levels set out in Scenarios 2 and 3.
- The scenario assumes a higher level of inward migration to the borough than other scenarios.

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12   Changes to the current planning system (August 2020)
13   Lichfield's https://lichfields.uk/grow-renew-protect-planning-for-the-future/how-many-homes-the-new-standard-method/#section18

- This scenario has the potential to deliver affordable housing at a proportionally higher rate than other options due to the overall housing requirement.
- This option provides the opportunity to increase economic activity beyond the first two scenarios as well as increase the potential opportunities for investment in infrastructure through new development.

6.4.5   The information in the table below is broken down by:

- The annual average number of new homes required from new site allocations and windfall development [14].
- The total number of new homes required from new site allocations and windfall development between 2020-40 (the proposed Local Plan period)
- The housing requirement options for each of the scenarios – in addition to new homes from site allocations and windfall development this figure includes the current assumed housing supply of around 9,000 homes based on the latest available Annual Monitoring Report [15] for the borough.

Table 2: Housing Requirement Options

	Economic Growth	Economic ambitions and population trends	Housing led growth
Annual new homes (site allocations and windfall)	403	519	705
Total new homes (site allocations and windfall) 2020-40	**8,065**	**10,385**	**14,105**
Total housing requirement options	16,960	19,280	23,000

Question 4

Which of the housing requirements set out above do you think the Council should be adopting? Are there any other evidenced based housing requirement options the Council should be considering?

14   Windfall development - an allowance for sites not specifically identified in the Local Plan
15   https://www.telford.gov.uk/downloads/file/14748/annual_monitoring_report_2019

7 Distribution of Growth

7.1 Introduction

7.1.1   The current strategy distributes growth between Telford, Newport and the rural area, based on population. The Telford, Newport and the rural areas are each described below:

- **Telford** – the main settlement in the borough, Telford is the main source of employment and is well connected to the national motorway (M54) and railway networks. Telford has been the focus for inward investment and jobs growth in the borough and will continue to fulfil that role moving forward.
- **Newport** – the settlement is located to the north east of Telford and is a traditional market town serving a wider rural hinterland. The town is to the west of the A41 and is currently growing to the south and south west with new employment and residential developments including the Newport Innovation Park.
- **Rural area** – the rural area sits to the north and west of Telford and contains several smaller villages and rural hamlets. The area has seen some growth recently with the two large brownfield sites, one of which at Allscott which has commenced construction. The area is also home to Harper Adams University.

Telford, Newport and rural area development boundaries
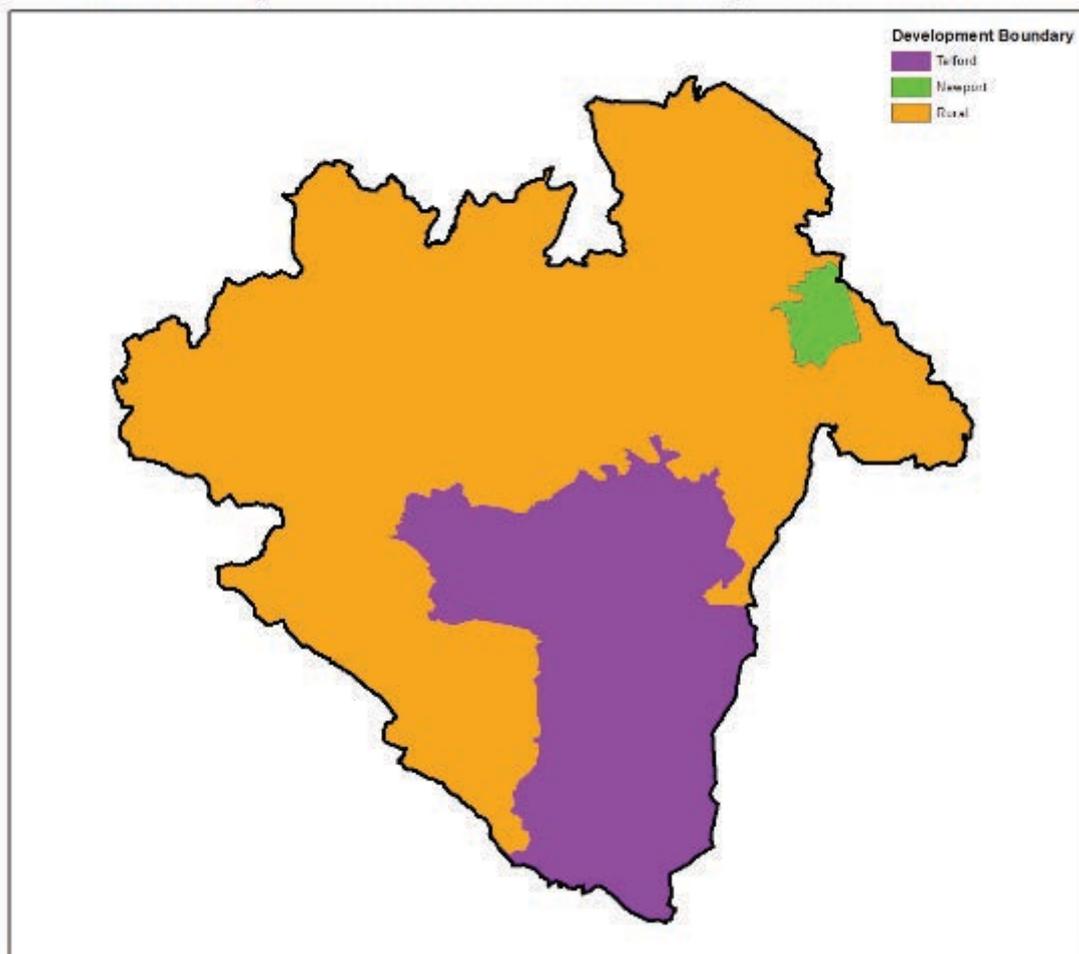
7.1.2   The Council have considered a range of options for the distribution of growth and developed four options it considers reasonable. Other alternatives were considered but have been discounted these include:

1. **Allocating greater levels of growth to Newport and the rural area –** This approach would have seen the level of growth allocated to Newport and the rural area exceed 25% set out in the options below. This was discounted because:

- Telford is the main settlement and will continue to be so into the future, this is recognised by the Council and reflected in the Marches LEP Strategic Economic Plan. This is demonstrated in the distribution options being put forward for consultation which show a range of 75% - 86% of growth going in or around Telford.
- Telford Development Corporation developed infrastructure to accommodate a population of 225,000. Although patterns of movement and employment may have changed the 'trunk infrastructure' is in place to support further growth.
- The distribution of growth significantly above the proportions set out below would dramatically alter the built environment and character of Newport and the rural area. It would also put potentially unacceptable burdens on development in the provision of extensive new highway infrastructure and other infrastructure such as drainage and utilities provision.

2. **The dispersal of growth across the borough –** This approach would have seen growth dispersed across the borough resulting in development across a larger number of smaller development sites. This was discounted because:

- It would reduce the potential to secure benefits from larger sites such as Sustainable Urban Extensions including renewable energy provision, a better mix of housing, mixed use development and the provision of publicly accessible green space.
- It is unlikely this strategy would meet the Council's housing requirements as it would be too reliant on smaller development sites coming forward across a greater range of locations.

7.2 Options for the distribution of growth

7.2.1   The Council is proposing four options for the distribution of growth for consultation:

Options for the distribution of growth

Option 1 - Maintaining the current distribution strategy

This option maintains consistency with the TWLP development strategy and would see Telford continue to be the focus for additional growth. There would be some additional growth in the rural area and Newport on top of existing committed levels of growth. This option was selected as it:

- Provides continuity in infrastructure planning and would help concentrate infrastructure delivery to support the development of transport corridors, new education infrastructure and new networks such as renewable energy provision and electric vehicle infrastructure;
- Focuses growth on Telford as the most sustainable location in the borough including supported, specialist and affordable accommodation in close proximity to jobs, services, facilities and schools;

- Delivers development in an area that can be served more easily by public sector agencies including police, fire, ambulance and NHS;
- Provides the greatest scope for the creation of more interconnected publicly accessible green spaces; and
- Maintains the focus of growth in and around Telford, including the potential for sustainable expansion beyond the current boundary.

Option 2 - Rural growth

This option would see an increase in growth in the rural area compared with the current distribution strategy. There would be proportionately less growth in Telford to allow for this and growth levels in Newport would be maintained. This option was selected as it:

- Provides an opportunity to test alternative distribution options for housing in the rural area including allocated development sites, additional key settlements and / or infill within existing villages (see below);
- Provides additional infrastructure and services within the rural area including highways, education, open space and drainage;
- Helps make rural settlements more sustainable and supports the long term viability and sustainability of rural services such as shops, pubs, community facilities and schools;
- Provides more scope for supported, specialist and affordable accommodation in the rural area enabling young people to stay within village communities and elderly to down size and remain within their community; and
- It has the potential to increase economic activity in the rural area and grow local businesses.

Option 3 - Newport growth

This option would see some additional growth in Newport compared with the current strategy. There would be proportionately less growth in Telford to allow for this and growth levels in the rural area would be maintained. This option was selected as it:

- Provides the opportunity for additional infrastructure in and around Newport for highways, education, open space and drainage infrastructure;
- Would create additional opportunities for economic activity in Newport including footfall within the town centre as well as the provision of additional employment land to generate new jobs; and
- Provides additional scope for supported, specialist and affordable accommodation in and around Newport.

Option 4. Rural and Newport growth – This option would see a quarter of growth outside of Telford with a balanced approach taken to the distribution of growth housing growth in the rural area and Newport. The option was selected as it:

- Provides a broader spread of housing options across the borough;
- Provides opportunities for additional infrastructure investment across both Newport and the rural area; and
- Helps balance out the potential for economic activity to support local services and facilities between Newport and the rural area.

7.2.2 The figure below sets out the proportional breakdown of the four options described above.

Figure 1: Distribution of Housing Options
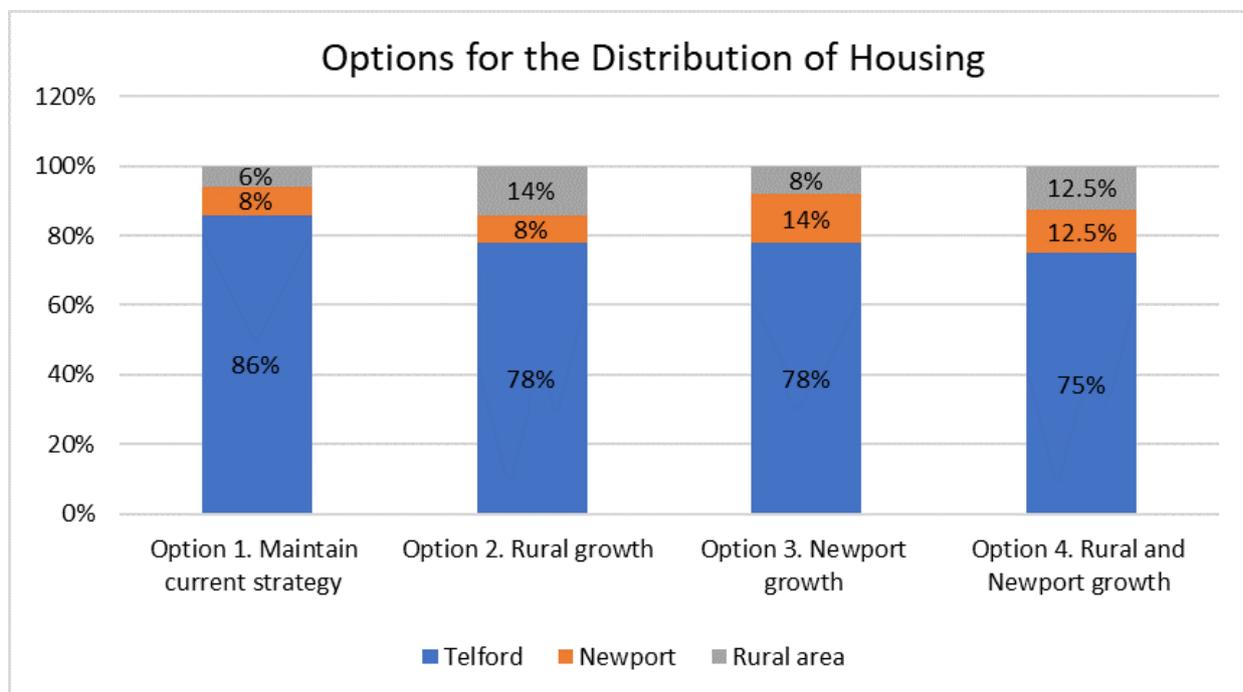
7.2.3 The four options represent reasonable alternative[16] strategies for the distribution of future development in the borough. The options provide a framework for the distribution of growth but do not, at this stage, identify specific development site. Sites will be identified at Preferred (Draft) Strategy stage following the close of the call for sites and site selection process.

Question 5

Question: Which of the four distribution strategies do you prefer the Council adopted as its preferred strategy?

Question 6

Question: Are there any other distribution options, supported by appropriate evidence, which the Council should be considering?

7.3 Distribution considerations for Telford and Newport

7.3.1　Telford remains the focus for growth, however there is likely to be less large scale development within the town due to existing levels of committed development and the need to protect publicly accessible green space. Should it not be possible to meet all of Telford's growth requirements within the existing urban boundary then expansion beyond the current boundary will need to be considered. Where this is the case proposals for Sustainable Urban Extensions (SUE) will be considered through the site selection process. This approach is supported by policy proposals for SUE sites that will seek a mix of development including jobs and homes, supporting infrastructure, opportunities for renewable energy provision as well as enhancements to the natural environment to help combat climate change and offset the loss of agricultural land.

7.3.2　Growth in Newport would be directed within the existing built up area. Should it not be possible to meet all of Newport's growth requirements within the town then development options in or on the edge of the town boundary would need to be considered.

Newport

7.3.3　The delivery of smaller development sites within Telford and Newport will be encouraged as a means of supporting small to medium sized builders within the borough. This would also support the delivery of smaller brownfield sites close to town and district centres where they would have regeneration benefits.

Question 7

Question: Are there any other options for meeting housing growth in Telford & Newport that the Council should be considering?

7.4 Distribution considerations for the rural area

7.4.1   The current strategy focuses growth on five key settlements of Lilleshall, Edgmond, Tibberton, Waters Upton and High Ercall. Distribution of development within the TWLP was based on existing sites with planning permission and windfall development coming forward in those settlements. The review needs to consider whether this is still the most appropriate strategy for the rural area based on the high levels of development and existing supply in some villages. The options for development in the rural area are set out below:

1. **Allocate housing sites –** This would deliver a planned strategy for meeting housing requirements in the rural area. It would provide certainty to communities about the location and scale of future growth and allow a strong position to be taken regarding speculative proposals that could come forward via planning applications. This approach would require a strategic view on where development could be located and what additional infrastructure (highways, drainage, schools for example) would be required to support growth. Neighbourhood Development Plans could also support this option by allocating housing sites in villages.
2. **Brownfield development opportunities –** Should brownfield sites come forward through the Call for Sites process they could be considered through the site selection process.
3. **Identify new key settlements –**To address the distribution of rural housing going forward it may be appropriate to identify further key settlements beyond the current five villages. This would be on the basis of assessing the level of development in the existing key settlements and the potential for other settlements to grow and accommodate housing development. The approach would recognise the proximity of rural settlements to each other and access to community facilities, where development in one village may support services in a village nearby[17].
4. **Continue a windfall / infill policy approach –** There is also the option of continuing with the current policy approach of the rural area meeting its needs through windfall sites, infill development and rural exception sites that might come forward.

7.4.2   There is scope for a mixed approach to development in the rural area through a combination of the approaches set out above in order to meet the housing requirement scenarios set out above.

Question 8

Question: Are there any other options for meeting rural housing growth that the Council should be considering?

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8 Review of development management policies

8.1 Introduction

8.1.1   This section covers the review of Local Plan development management policies, under the following headings:

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17   Paragraph 78, National Planning Policy Framework (2019)

- **Economy –** employment land, retail centres policy, tourism and rural economy.
- **Housing –** housing requirement, housing needs for different groups in the community, rural housing and Gypsy and Traveller accommodation.
- **Natural Environment –** biodiversity and geodiversity, trees and woodlands, public open space, green network and strategic landscapes.
- **Community –** the protection and development of community facilities and culture.
- **Connections –** sustainable transport, highways development, design of parking and policies covering communications infrastructure.
- **Built environment & heritage –** design quality, historic environment and land conditions.
- **Environmental Resources –** renewable energy, minerals, waste and water resources.

8.1.2   Each section covers relevant policy, legislative and local changes to be taken into account and sets out proposed amendments to policies. The policy amendments include policies to be retained and amended; proposed new policies; and policies to be retained where no material amendments are proposed. There are questions to accompany policy proposals and there is also the opportunity to make general comments on each section.

8.2 Viability

8.2.1   National Planning Practice Guidance states that the role for viability assessment is primarily at the plan making stage. It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies[18].

8.2.2   It is a key part of the review to ensure the provision of infrastructure whilst ensuring that the Plan is deliverable and development is not overburdened. As such, the Review will update proposed contributions to affordable housing and other infrastructure that developers need to make. A whole plan viability assessment will be used to test proposed policies and this will inform the draft plan at the next stage of this review.

8.3 Supporting policy text

8.3.1   The Council will, as part of the Preferred Options Stage, update the supporting text for policies within the plan to ensure it is up to date, factually correct and aligns with policy proposals taken forward. This is likely to apply to policies that are retained and amended as well as policies that are retained without any material amendments. For example, a minor update will have to be made to Policy HO1 to reflect the new housing requirement.

8.4 Economy

8.4.1 Introduction

8.4.1.1   The NPPF places significant weight on the need to support economic growth and productivity, and states that planning policies should help create the conditions in which businesses can invest, expand and adapt[19]. The NPPF also requires planning policies to support a prosperous rural economy[20].

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18   NPPG Paragraph 002 Reference ID: 10-002-20190509
19   Paragraph 80, National Planning Policy Framework (2019)
20   Paragraph 83-84, National Planning Policy Framework (2019)

8.4.1.2   Since the Local Plan was adopted the majority of the allocated employment land has been successfully delivered, with inward investment into areas such as Hortonwood, T54 and Donnington Wood, and significant support given to indigenous businesses to assist in their growth. The availability of shovel ready industrial land, at very competitive prices and a Council led business support service has put Telford at the top of areas to invest. To continue to support the economic growth of the borough and assist recovery from the effects of Covid-19, the Council must ensure the provision of a supply of an appropriately diverse portfolio of employment land and buildings. The Local Plan also seeks to promote a diverse rural economy.

8.4.1.3   The Local Plan retail and leisure policies direct the type of development that is appropriate for each centre and seeks to maintain their position for commercial and economic activity. In July 2020 the Government announced new permitted development rights and revised the Use Classes which could have an impact on our high streets and town centres. These changes will be considered as part of the review.

Southwater

8.4.2 Policies to be retained and amended

Employment land in urban and rural areas (Policies EC1 and EC3)

8.4.2.1   To ensure that the Local Plan continues to support the success and future growth ambitions of Telford and Wrekin further employment land should be allocated by updating Policy EC1. This will support the Council's Economic Development Strategy and priority for inward investment and jobs opportunities. This also provides the opportunity to amend the Policy to ensure it effectively serves its purpose and is clear about the types of uses supported on sites.

8.4.2.2   The updated policy could also include measures to ensure that existing employment sites outside of the Strategic Employment Areas (SEA) are protected for employment use similar to the protection provided to sites within the SEA. This would ensure better distribution of well-connected employment land across Telford in particular.

8.4.2.3   Policy EC2 sets out criteria for assessing employment proposals in the urban area. The Council will continue to support new and expanded employment developments where they contribute to the borough's economic prosperity. As part of the review, new employment sites will need to be identified to meet the employment growth requirements, including sites on the

edge of the existing built up area. If new large-scale inward investment opportunities were to come forward during the plan period on unallocated land adjacent to the built up area of Telford, Policy E2 could set additional criteria for determining schemes.

8.4.2.4   Policy EC3 encourages appropriate development that re-uses existing buildings or redevelops brownfield land however, it is restrictive over the types of uses that are appropriate. This restrictiveness over use is no longer compliant with the NPPF (Paragraph 83) which states that planning policies should enable "the sustainable growth and expansion of **all types of business** in rural areas both through conversion of existing buildings and well-designed new buildings" (our emphasis). The proposed option would reflect this.

Policy EC1: Strategic Employment Areas

Approach:

Identify new employment land supply and update the land requirement

Proposals:

1.   Review employment areas not currently covered by EC1 and assess sites for the employment uses under policy EC1.

2.   Where new allocations are proposed clarify what uses are acceptable for relevant sites in relation to the surrounding uses and situation of the site.

Question 9

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

Policy EC2: Employment in the urban area

Approach:

Proposals for employment development adjacent to the boundary of Telford on unallocated land would need to demonstrate significant benefits to the borough in terms of economic opportunities (jobs and inward investment) and demonstrate specific locational requirements (accessibility, sector specific requirements and economic benefits). Proposals would also need to satisfy environmental and technical considerations.

Question 10

Do you agree with the approach for large-scale inward investment opportunities adjacent to the built up area?

Policy EC3: Employment in the rural area

Approach:

Strengthen the policy to help diversify the rural economy

Proposal:

Broaden the uses permitted in the rural area by this policy by allowing developments where it is successfully demonstrated that they would benefit from a rural area, cannot locate in the urban area and would not have a detrimental impact to the rural area.

Question 11

Do you agree with the policy proposal set out above? Are there any other proposals that should be considered?

Managing our urban centres (Policies EC4 - EC10)

8.4.2.5   Industries such as leisure and hospitality are among those worse affected by Covid-19 and form a significant proportion of the businesses located in the urban centres. There has also been a rise in online shopping and delivery services with some businesses also adapting to meet local shopping needs. As such the approach to managing urban centres needs to be flexible enough to enable recovery and meet the longer term structural challenges in areas such as retail, but balanced to appropriately protect the continued role of centres and hubs for economic, social and leisure activities.

8.4.2.6   Recent government revisions to the Use Classes Order together with new permitted development rights have been introduced including the:

- Change of use from shops to offices;
- Takeaways to dwellings; and
- Demolition of buildings to be replaced by residential together

8.4.2.7   These changes will impact how development in centres can and will be managed; however, new flexibilities need to be appropriate to ensure there isn't a predominance of a limited number of uses within centres.

8.4.2.8   Policy EC4 sets out a hierarchy of the urban centres of the borough. The hierarchy of centres remains accurate in reflecting the size, location and sustainability of the centres in the borough. There may be the need designate additional centres should developments of a sufficient size come forward. At this stage, the Council is not proposing to consult on changes to the policy.

8.4.2.9   Policy EC5 focuses on the shopping function of Telford town centre. This role should be retained and as such the majority of the policy remains relevant. To support the continued evolution of Telford Town Centre and its main shopping function, other uses in and around the Primary Shopping Area should be supported especially where they generate footfall and customers. This could include appropriate residential development, live-work units, new models of office provision and encouraging growth industries such as I.C.T, research and development and the knowledge sector that would be compatible with the main town centre uses. The role of Telford International Centre as a town centre culture and leisure facility will continue to be supported.

Telford International Centre

8.4.2.10   Proposed changes to Policy EC6 seek to provide a more flexible approach towards uses in Market Towns and District Centres to encourage their diversification and regeneration, supporting new uses. However, uses that could detract from a centre or adversely impact public health need to be restricted. Key to regeneration is the flexibility of spaces to meet different needs such as live-work units, encouraging "enterprise hubs or nodes", allowing a mix of residential and encouraging new community uses such as leisure.

8.4.2.11   Policy EC8 focuses on controlling retail development outside and on the edge of centres. It is important to protect the function of our centres particularly as we seek to aid recovery in our high streets which have been impacted by the closure of shops due to changes in shopping habits during the Covid-19 pandemic. As such, it is important that this policy is appropriately flexible to encourage development but protects our centres.

8.4.2.12   The Telford Innovation Campus of Wolverhampton University, located in Priorslee has made significant investments into its engineering and manufacturing faculty, with a particular focus on automotive manufacturing and is currently expanding its provision in health and social care. Harper Adams University is a world leader in agri technology. The Local Plan Review provides an opportunity to ensure that policy is sufficiently flexible to support further opportunities for the growth of educational establishments in the borough to support the upskilling and reskilling of our workforce.

Policy EC5: Telford Town Centre

Approach:

Amend policy to recognise changing role of town centres and continue to support the ambitions and success of Telford.

Proposals:

1.   Amend criteria for changes of use in Primary Shopping Area to include criteria supporting uses that attract would high footfall.

2.   Clarify the position regarding the scope and scale of residential development within Telford Town Centre.

3.   Encourage the diversification of uses in Telford Town Centre, including where appropriate residential development.

4.   Encourage high-tech, R&D, Information Technology industries and knowledge based industries to locate in Telford Town Centre.

5.   Amend the boundary of the Stafford Park SEA to remove the section overlapping with the Telford Town Centre boundary.

6.   Add criteria to ensure development does not adversely impact public health.

Question 12

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

Policy EC6: Market Towns and District Centres

Approach:

Recognise the need for flexibility to aid the role of centres whilst guarding against the predominance of uses.

Proposals:

1.   Strengthen the criteria for change of use to non-retail uses in the town centre with criteria that supports uses providing a direct service to the public; and maintains and enhances the vitality, attractiveness and viability of the centre.

2.   Review criteria that restricts 'adjacent non-retail uses'. This could introduce additional flexibility by adding criteria that restricts uses by their nature or impact on the high street such as restricting night time uses and defining the number of similar uses classes that will be supported in the Primary Shopping Areas.

3.   Add criteria that supports the use of outdoor space for uses that complement the function of the centre. This could include outdoor seating for restaurants and cafes, pop up markets and events. This support would be conditional on the proposed use being complimentary to the function of the centre, not resulting in detrimental impacts on transport or public safety and being of an appropriate design.

4.   Add criteria to ensure development does not adversely impact public health.

5.   Review the boundaries of Primary Shopping Areas with a view to concentrating retail development within core areas.

Question 13

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

Policy EC8: Out of centre and edge of centre development

Approach:

Review the policy to incorporate more flexibility in uses permitted out of centre and on the edge of centre.

Proposals:

Additional clarification could be provided that leisure uses as well as retail uses in these locations could be acceptable where it can be demonstrated that there is no suitable site available in the centres. In addition the proposal would not have a detrimental impact on the centres, this could be demonstrated through an impact assessment.

Question 14

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

8.4.3 Policies proposed to be retained with no changes

8.4.3.1 The following policies are proposed to be retained with no changes:

- EC2 Employment in the urban area.
- EC4 Hierarchy of centres.
- EC7 Local centres and rural services.
- EC9 Evening and night time economy.
- EC10 Shop front and advertisement design.
- EC11 Improving links to tourist destinations.
- EC12 Leisure, cultural and tourism development.

Question 15

Are there any other comments you would like to make on this section?

8.5 Housing

8.5.1 Introduction

8.5.1.1 The right balance of good quality homes which are affordable, sustainable and provide variety, choice and accessibility, are essential to the economic prosperity, health and well-being of the people in our borough. The Local Plan allocates a range of sites to meet housing needs and sets out policies which support the delivery of a wide choice of high quality homes. Policies also address the housing needs of different groups in the community.

8.5.1.2 The review will consider the Council's recently published Housing Strategy[21] which focuses efforts to ensure there is suitable housing for all, particularly the most vulnerable, through the provision of additional homes but also by looking after and protecting the homes we already have. The Council supports the 'Everybody in for Good' initiative which would mean everyone has an offer of accommodation and no one has to resort to rough sleeping. The Council's Specialist and Supported Accommodation Strategy [22] was also recently published and sets out how the Council will make best use of existing accommodation, develop a range of specialist and supported accommodation, and ensure that support and care services promote people's wellbeing and independence.

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21 The draft Housing Strategy 2020 - 2025 by Telford & Wrekin Council is expected to be approved in autumn 2020 following public consultation.
22 Specialist and Supported Accommodation Strategy by Housing Learning Information Network (2020)

8.5.2 Policies to be retained and amended

Housing growth and delivery (Policy HO2)

8.5.2.1   The Council has a supply of housing sites with planning permission (commitments) and small sites not allocated in the Local Plan (windfall sites). This supply contributes towards meeting future housing needs; however, it is likely that additional allocations will still be needed to meet future requirements. This creates opportunities to use previously developed land in suitable locations and support small/medium developers including local building companies. Given the housing requirement options are discussed in section 5 of this document, the Council is not consulting on proposed changes to Policies HO1 and HO3 at this stage. The preferred option would be presented at Draft Plan stage and updates to the housing requirement and trajectory would then be presented.

8.5.2.2   The Council will no longer prepare a separate 'Housing Site Allocations Local Plan' to identify further sites in the current Local Plan. Housing allocations will instead come forward through the Review to meet the new housing requirement and be set out in the Draft Plan.

8.5.2.3   Policy HO2 in the Local Plan sets out principles for delivering a Sustainable Urban Extension (SUE) in Priorslee. The Priorslee site has outline permission and it is not proposed to change the requirements for this site within Policy HO2. If future employment and housing needs cannot be met entirely in the built-up areas, further SUEs may need to be identified and the Council proposes the following SUE principles:

- A mix of uses (amount and type of development) which ensure that employment and housing are considered together to help meet identified needs including a range of housing types and tenures that support intergeneration and co-location within;
- Seeking high quality development which, through its location, orientation and design (buildings and public realm), adapts to the impacts of climate change and supports the move towards carbon neutrality; and
- Infrastructure provision which includes services, local facilities, public open space provision, renewable energy, sustainable transport (walking, cycling and sustainable transport), access to the highway network and opportunities for net environmental gains.

8.5.2.4   The review will need to consider how local design tools can be applied to new developments, such as workshops, design advice/review services, frameworks (such as Building for Life), design codes and guides[23]. This will be considered alongside current design policies (BE1 and BE2).

Policy HO2: Housing allocations

Approach:

Address options for housing allocations to meet requirements.

Proposals:

1.   Identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare in line with national planning policy.

2.   Set out criteria-based policy requirements for all housing allocations which address the mix of uses, seeking high quality development and infrastructure provision.

3.   Set out development principles for Sustainable Urban Extensions.

4.   Set out design tools and processes for housing allocations.

Question 16

Do you agree with the policy proposals? Are there any other proposals the Council should consider?

Housing mix and quality (Policy HO4)

8.5.2.5   Policy HO4 in the Local Plan requires major developments to comply with the government's nationally described space standards[24]. The review will consider how standards (space, physical accessibility, environmental performance and design) could be reconciled within policy and whether more targeted approaches should be considered. Space standards can help prevent overcrowding and promote good health and well-being. Delivering sustainable, energy efficient housing could, for example, include setting carbon reduction requirements for new homes expressed as a percentage reduction improvement over Building Regulations progressing towards zero carbon.

8.5.2.6   There is a need for well-designed places that respond to changing demographic needs, which provide 'future-proof' housing built to higher accessibility levels (Category M Part 2) as well as purpose-built specialist accommodation.

8.5.2.7   Creating homes which enable people to live independently for longer is important for their health and wellbeing while also helping to reduce the costs of adult health and social care. The Local Plan should seek to promote high accessibility standards, adaptability and/or fully wheelchair accessible standards in all new build homes and policies can require a proportion of dwellings to meet the category standard in Building Regulations Part M, based on evidence and viability. The adaptation of existing homes to support independent living should also be considered.

8.5.2.8   An increasing proportion of the borough's homes are part of the private rented sector, including purpose built and managed rented housing (Build to Rent). The Review will need to consider how different models such as Build to Rent homes and low cost home ownership initiatives (such as First Homes) could form part of the housing mix.

Policy HO4: Housing mix and quality in Telford

Approach:

Support delivery of a range of housing and improved housing standards.

Proposals:

1.   To adopt an approach to the Nationally Described Space Standards (NDSS) either:

a.   Continue to require major developments to deliver a range of housing types, sizes and tenures and to meet the Nationally Described Space Standards (NDSS); or

b.   Apply the NDSS to all new developments (including conversions).

2.   Setting out a housing mix (size, type and tenure) to reflect need in the borough. This could be provided in the policy or through a Supplementary Planning Document;

3.   Consider other housing design requirements in response to changing lifestyles and working patterns, including minimum garden and amenity space standards for new homes;

4.   Setting specific standards for energy efficiency in new homes to reduce water and energy use and adapt to the changing climate;

5.   Set out specific measures for adaptable, accessible and wheelchair homes as set out in Building Regulations Part M.

Question 17

Do you agree with the policy proposals? Are there any other proposals the Council should consider?

Affordable housing (Policies HO5 and HO6)

8.5.2.9   While housing affordability across the borough has remained stable in recent years and affordable housing delivery has increased, the total stock has not increased significantly over the last five years due to the impact of 'Right to Buy', redevelopment, other sales and shared ownership 'stair casing'.

8.5.2.10   Both the Council's Housing Strategy and the Review provide a framework to secure meaningful increases in affordable homes delivery. Affordable housing must be genuinely affordable based on local values and the types and tenures of new homes must meet local

needs. Policies will set out the percentage of affordable homes sought on new schemes, which could differ by type or location of development and subject to viability to ensure that policies are deliverable.

Affordable Housing, Wellington

8.5.2.11   As part of the review the Council will consider the West Midlands Combined Authority's (WMCA's) localised definition of affordable housing which is based on local people paying no more than 35% of their salary on mortgages or rent. The review will also set out how the Council expects to work with registered providers, the models of affordable housing expected and examine opportunities to increase housing supply through approaches such as community based housing. The Council will investigate opportunities to help local people, in particular key workers and veterans, to find and sustain the homes needed. The Council will also look at ways to protect existing social housing stock, for example through limiting 'stair casing', the targeted reinvestment of sales proceeds and discouraging other sales.

8.5.2.12   The Council will consider if planning guidance could address matters such as affordable housing tenure, on-site provision, design and layout, and clarifying tenure neutrality in terms of design principles (including parking) and integration within schemes. The provision of on-site affordable housing remains a priority to create sustainable, accessible, affordable and integrated communities.

Policy HO5: Affordable housing thresholds and percentages

Approach:

Update the affordable housing policy requirements based on evidence of need and viability.

Proposals:

1.   Set a borough-wide affordable housing requirement on sites of 10 dwellings or more.

2.   Consider affordable housing definition which links to local income rather than house prices.

3.   Set different affordable housing requirements by type, size and tenure as well as proportion, to reflect varying needs.

Question 18

Do you agree with the proposed affordable housing needs proposals? Are there any other proposals the Council should consider?

Policy HO6: Delivery of affordable housing

Approach:

Clarify the policy approach for on-site provision, delivery mechanisms and tenures of affordable homes.

Proposals:

1.   Set out affordable housing tenure requirements in policy and/or guidance.

2.   Prepare a supplementary planning document which sets out guidance on the Council's approach to affordable housing delivery.

Question 19

Do you agree with the proposed affordable housing delivery proposals? Are there any other proposals the Council should consider?

Specialist and supported accommodation (Policy HO7)

8.5.2.13   The Local Plan needs to provide a range of homes to meet the needs of communities and ensure those who need specialist and supported accommodation[25] can find a home that is right for them. The Review will instil principles of intergeneration, co-location and interaction in future communities. A Supplementary Planning Document will be prepared to set out how specialist and supported accommodation could incorporate contemporary design standards

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25   Specialist and supported accommodation includes housing for older people, people with disabilities, people with mental health needs, people with complex needs, people at risk of homelessness who have a (non-assessed) mental health need, and young vulnerable people.

and features, such as Housing our Ageing Population Panel for Innovation (HAPPI) principles of design. The Review will also consider further opportunities to meet housing needs for specific vulnerable groups by way of off-site financial contributions.

Policy HO7: Specialist and supported housing

Approach:

Review the policy approach to delivering specialist and supported housing needs.

Proposals:

1.   Review Policy HO7 to either:

a.   Continue with the current Policy HO7 approach which supports specialist and supported housing subject to meeting needs, location and design criteria; or

b.   Provide an expanded policy approach which includes additional criteria for specialist and supported accommodation needs.

2.   Consider measures to secure supported and specialist accommodation through new development this could include potential for thresholds / proportions of provision on site;

3.   Identify further opportunities to meet housing needs for specific vulnerable groups by way of off-site financial contributions.

Question 20

Do you agree with the proposed specialist housing policy proposals? Are there any other proposals the Council should consider?

Providing pitches for Gypsies, Travellers and Travelling Showpeople (Policies HO8 and HO9)

8.5.2.14   The Council should identify traveller sites for at least ten years' worth of need[26]. The Council facilitated delivery of an extension to the Lodge Road site for Gypsy and Traveller pitches; however, there is an outstanding need to be met during the current plan period. The Council is updating its evidence to establish future accommodation needs. Where applications are made for existing and future sites, they should be well designed, meet modern standards and be fit for purpose for permanent and transit residents.

Policy HO8: Meeting the needs of the Gypsy and Traveller community

26   Planning policy for traveller sites (2015)

Approach:

Update the evidence for Travellers' needs and, if required, identify new site(s).

Question 21

Do you agree with the proposed policy approach for Gypsy, Traveller and Travelling Showpeople accommodation? Are there any other policy approaches the Council should consider?

Policy HO9: Gypsy and Traveller developments

Approach:

Consider any new or revised criteria-based policy requirements for applications.

Question 22

Do you agree with the proposed policy approach for Gypsy, Traveller and Travelling Showpeople developments? Are there any other policy approaches the Council should consider?

Rural housing (Policies HO10 and HO11)

8.5.2.15   The Local Plan supports a limited amount of infill housing (Policy HO10) in Edgmond, High Ercall, Lilleshall, Tibberton and Waters Upton. Housing delivery in the five villages has varied, with Tibberton accommodating the most new housing. Through the review there is an opportunity to consider whether alternative policy approaches should be taken forward; for example, distributing housing across more villages. An assessment of facilities and services against a revised set of criteria would be undertaken to inform the list of villages.

8.5.2.16   Several villages have prepared neighbourhood plans to manage future development including allocating small and medium-sized sites suitable for housing in the area[27]. Through the review, decisions for new housing sites could be community-led and could also be supported in new or revised neighbourhood plans in consultation with local residents.

Policy HO10: Residential development in the rural area

27   Paragraph 69 National Planning Policy Framework (2019)

Approach:

Consider alternative policy approaches to housing delivery in the rural area.

Proposals:

1.   Continue with the current approach which directs limited infill housing to Edgmond, High Ercall, Lilleshall, Tibberton and Waters Upton.

2.   Establish a revised list of villages which may include some, all or more villages, than at present.

3.   Support housing allocations in these villages through locally-prepared neighbourhood plans.

4.   Allocate housing sites in these villages through the Local Plan review.

5.   Identify additional previously developed land opportunities in the rural area for housing.

Question 23

How should the Local Plan meet the housing needs of rural communities?

8.5.2.17   Elsewhere in the rural area, affordable housing delivery has proven challenging, with issues of eligibility for affordable housing (need and local connection), design and land values. Other options to Policy HO11 could be considered, for example allowing some market housing to facilitate delivery of rural exception sites. The local connections criteria, cascade arrangements and affordable housing allocations process will also be reviewed to clarify rural affordable housing provision for people who have a clear need to live in a community and has strong local connections.

Policy HO11: Affordable rural exceptions

Approach:

Consider alternative policy approaches to delivering affordable rural exceptions.

Proposals:

1.   Support affordable exception sites and some market housing in rural villages.

2.   Set out revised policy criteria for affordable exception sites to address affordable need and location requirements.

3.   Review the local connection criteria and arrangements for allocating affordable homes.

Question 24

Do you agree with the policy proposals for affordable rural exceptions? Are there any other proposals the Council should consider?

8.5.3 Proposed new policies

Telford New Town estates

8.5.3.1   The Council's Housing Strategy focuses on housing renewal in the borough, starting with some of the earliest new town housing estates. A 'New Town Futures' Programme is proposed in the draft Housing Strategy to help revitalise South Telford and to build stronger communities with local district centres as hubs.

8.5.3.2   The Review can set out a framework to support regeneration and redevelopment opportunities; for example, encouraging development on suitable small windfall (unallocated) sites within designated areas and reinvestment of council tax and business rates in infrastructure to support growth and regeneration in these areas. The Council supports the positive redevelopment and improvement of existing homes to address climate change and reduce fuel poverty.

Proposed policy: New Town Estates

Approach:

A policy framework that supports housing renewal in the borough.

Proposals:

1.   Support the delivery of smaller previously developed sites on windfall sites;

2.   Encourages site assembly for the purposes of regeneration;

3.   Consider measures to control HMO's;

4.   Designate areas through the policies map to support regeneration;

5.   Encourage the use of advanced methods of construction in delivering new homes including replacing housing stock;

6.   Leverage other funding opportunities that might arise to support regeneration opportunities;

7.   Supporting innovative approaches that lead to quality development; and

8.   Improving access within and between new town estates, town and district centres and employment areas.

Question 25

How should the Local Plan support the regeneration of New Town Estates?

Self-build and custom house building in Telford

8.5.3.3   Self-build and custom house building is where individuals, or groups, build or complete homes for their own occupation[28]. Policy HO11 supports affordable self and custom-build homes in the rural area but this does not preclude sites coming forward in Telford and Newport. A new policy could support self-build homes on smaller, previously developed sites and encourage quality design.

Proposed policy: Self-build and custom house building

Approach:

Supporting self-build and custom house building opportunities in the borough.

Proposals:

1.   A criteria-based policy that supports the housing needs of different groups in the community, including self-build and custom house building, based on evidence of needs; and/or

2.   Allocate sites for self-build and custom house building based on the interest and preferences of people on the self-build register.

Question 26

Do you agree with the policy proposals set out above? Are there any other policy options the Council should consider?

8.5.4 Policies proposed to be retained with no changes

8.5.4.1   The following policies are proposed to be retained with no changes:

- HO1 Housing requirement.
- HO3 Housing trajectory.

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28   Self-build and Custom House building Act 2015 (as amended by the Housing and Planning Act 2016)

Question 27

Do you have any other comments on housing policies as part of the Local Plan review?

8.6 Natural environment

8.6.1 Introduction

8.6.1.1   The Local Plan natural environment policies cover biodiversity, trees, public open space and strategic landscapes. The policies are embedded within the borough's existing, extensive network of functioning green infrastructure and within the original design of the New Town of Telford as a 'Forest City.' They seek to protect the valuable natural assets of the borough in line with the NPPF[29] and NPPG and to set out expectations on developers.

8.6.1.2   The review provides an opportunity to review natural environment policies and proposals set within the context of recent policy and legislative announcements. This includes regulations[30] which seek to embed the legal protection to habitats, species and designated sites which were secured through the EU Habitats Directive[31] and the EU Birds Directive[32] in the UK legislative framework when the UK leaves the EU; and the Environment Bill which introduces net gain through planning as a new mandatory requirement (subject to consultation[33]). Locally, the Council sits on the Shropshire Hills Area of Outstanding Natural Beauty (AONB) partnership and is involved in the process to review, update and adopt the AONB management plan. The most recent update was adopted in 2019.

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29   National Planning Policy Framework (2019)
30   The Conservation of Habitats & Species (amendment) (EU Exit) Regulations 2019
31   The Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.
32   Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds.
33   British Standard BS 8683 Process for designing and implementing Biodiversity Net Gain – Specification

Trees at the Wrekin
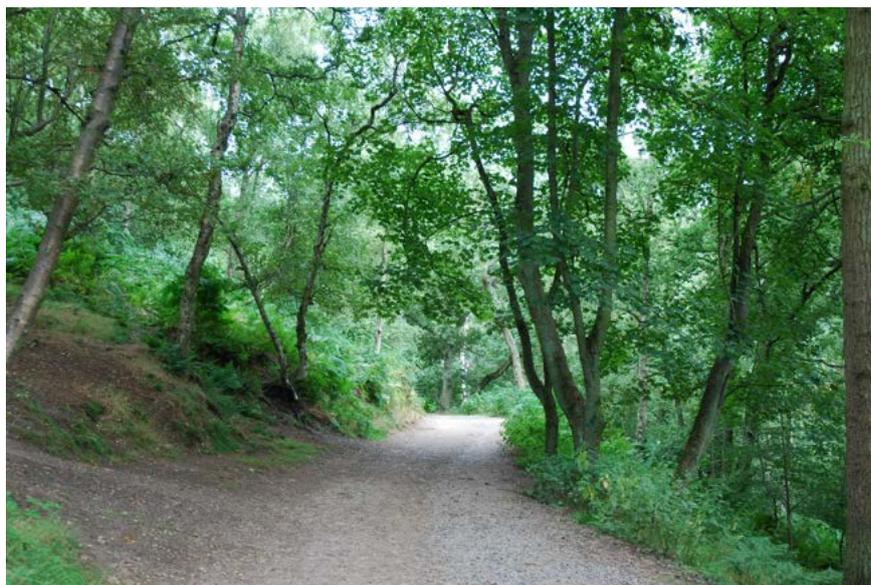
8.6.1.3   In July 2020 Natural England granted the Council an organisational licence to operate Strategic Newt Licencing as an alternative to traditional mitigation licencing for developments that occur near to great crested newt populations. District level licencing calculates the impact of a particular development in terms of the number of ponds affected and the likelihood of great crested newts being present and calculates a Conservation Payment which is then spent by the Habitat Delivery Body (led by the Council) to deliver newt habitat in a strategic way across the borough.

8.6.2 Policies to be retained and amended

8.6.2.1   The review provides an opportunity to undertake a significant review of the Natural Environment chapter both in terms of the existing policies and supporting text to address local priorities and respond to national policy and legislative requirements.

8.6.2.2   Linked to several proposed policy amendments set out below it is proposed to produce a 'Designing Naturally' Supplementary Planning Document (SPD) covering biodiversity, trees, open spaces and design. The SPD will define public open space and provide guidance on the type, quality, design and appropriate siting of public open space (including play areas and sports facilities) that would be expected. It will consider the circumstances in which the Council will accept off-site provision, ongoing maintenance and management including the use of Section 106 agreements, the adoption of open space by the local planning authority, and the use of Community Use Agreements.

Biodiversity and trees (NE1 and NE2)

8.6.2.3   Policy NE1 will need to be revised including to reflect the great crested newt district level licencing, the introduction of mandatory biodiversity net gain as set out in the Environment Bill (set out in a new policy) and to reflect other proposed amendments and new policies within this chapter.

8.6.2.4   Proposed amendments to Policy NE2 are based on its use in decisions, ongoing Council aspirations for green space and canopy cover and to reflect standing advice from Forestry Commission and Natural England regarding protection of ancient woodlands and aged and veteran trees. The Council also proposes to provide a guidance note to developers setting out the information required as part of an Arboricultural Impact Assessment and a Tree Survey.

Policy NE1: Biodiversity and geodiversity

Approach:

Amend the Policy to reflect local and national policy change.

Proposals:

1.   To establish mandatory Biodiversity Net Gain and to set the required uplift in biodiversity units across all developments in the borough (also covered in a proposed new policy); and

2.   To introduce the application of an Urban Greening Factor to all developments in the borough (also covered in a proposed new policy); and

3.   To introduce the proposed production and adoption of a Supplementary Planning Document covering the natural environment; and

4.   To update the requirements around ecological surveys to broaden the definitions of these surveys to 'future proof' the policy against coming changes in the way that ecology is assessed, measured and reported in the planning process; and

5.   To introduce the Council's Strategic Newt Licencing scheme which allows for strategic great crested newt mitigation on a district level; and

6.   To provide additional protection to ancient woodlands, aged, veteran and ancient trees in line with Forestry Commission and Natural England Standing Advice; and

7.   To set a standard buffer distance between developments and ancient woodland.

Question 28

Do you agree with the proposals for Policy NE1: Biodiversity and geodiversity? Are there any other changes you would like the Council to consider?

Policy NE2: Trees, hedegrows and woodlands

Approach:

Amend the policy to reflect the Councils ambition for the borough as a forest community and to reflect local and national guidance/advice.

Proposals:

1.   To ensure that impacts upon ancient woodland and veteran and aged trees are not permitted; and

2.   To support developments which exceed the minimum Root Protection Areas for retained trees; and

3.   To ensure that the Root Protection Area for aged and veteran trees retained within developments always exceeds 15 times the trunk diameter or 5m beyond the crown, whichever is the larger; and

4.   To support developments which design sites to appropriately buffer existing woodlands and to have appropriately designed interfaces with existing woodlands where public open space and then highways face onto woodland edges (with schemes where garden land faces onto retained woodland being resisted); and

5.   To ensure that ancient woodland is buffered by a distance of 30m from development; and

6.   To include a tree planting palate which mixes native trees of local provenance with climate change resilient species.

Question 29

Do you agree with the proposals for Policy NE2: Trees, woodlands and hedgerows? Are there any other proposals you would like the Council to consider?

Public open spaces (Policies NE3, NE4 and NE5)

8.6.2.5   Amendments to Policy NE3 will seek to clarify the Council's expectations for public open space. The supporting text will define public open space and give greater protection to school playing fields and prevent the loss of those facilities as a result of development. The borough has a number of formal parks which under proposals would be named in the policy along with criteria to help protect the parks, they would also be included on the policies map.

8.6.2.6   Policy NE4 sets out guidance for the provision of public open space in major developments. The policy could clarify the Council's expectations and include defined triggers in terms of child bed spaces for the provision of public open space and sports facilities. This policy will be supported at the Draft Plan stage by an updated Playing Pitch Strategy, an updated Play Strategy and a proposed outdoor recreation strategy for the borough. Policy NE5 seeks

to secure the appropriate management and maintenance of public open space. The policy will clarify the Council's expectations for landscape management planning in perpetuity and the ongoing funding of management operations, supplemented by planning guidance.

Policy NE3: Existing public open space

Approach:

Amend the policy for clarification.

Proposals:

1.   The Council will amend the adopted policy to ensure the protection of school playing fields in line with Sport England's Playing Fields Policy.

2.   Define planning boundaries for Telford Town Park and formal parks within the borough on the policies map, name the parks within the policy and provide criteria to protect the parks from unwanted development.

Question 30

Do you support the proposal for Policy NE3: Existing public open space? Are there any other proposals you would like the Council to consider?

Policy NE4: Provision of public open space

Approach:

Amend the policy to provide clear, detailed triggers for the provision of public open space.

Proposals:

1.   To provide a definition of public open space which puts the focus on land which can be actively used by members of the public. Although other open land may be provided for example to meet biodiversity or sustainable urban drainage needs of the development the Council wishes to be clear that sufficient land with public access is a priority; and

2.   To provide a trigger for provision of play areas to development:

a)   On sites providing more than 75 and less than 200 new child bed spaces (or where two or more adjacent sites are combining to provide this level of new bed spaces), a "local" equipped area for play;

b)   On sites of 200 new childbed spaces or more (or where two or more adjacent sites are combining to provide this level of new bed spaces), a "neighbourhood" equipped area for play.

c)   The Council will provide accompanying clarifying details on the design, buffering, location and standards for provision of different types of public open space in an associated SPD; and

d)   To provide a clear trigger for the provision of sports facilities within the policy and to set out accompanying clarifying details in the associated SPD; and

e)   To seek the provision of a range of community open spaces within developments including allotments, community orchards, village greens and areas of public art.

3.   To set out mitigation measures where off-site contributions are required.

Question 31

Do you support the proposals for Policy NE4: Provision of public open space? Are there other proposals that you would like the Council to consider?

Policy NE5: Management and maintenance of public open space

Approach:

Amend the policy to provide further clarity to developers of the Councils expectations for the management and maintenance of public open space.

Proposals:

1.   To clarify that long term management of public open space, play facilities, sports facilities and associated infrastructure, landscaping, sustainable urban drainage features and biodiversity habitats and any other associated features on development sites is to be in perpetuity; and

2.   To clarify that developers will be expected to demonstrate funding for these management activities, and any others required by the site design, in perpetuity; and

3.   To set out how the Council will oversee and approve the production of landscape management plans covering the elements set out in (1) above and will oversee and approve any changes to the management regime in the long term.

> **Question 32**
>
> Do you support the proposals for Policy NE5: Management and maintenance of public open space? Are there any other proposals you wish the Council to consider?

8.6.3 Proposed new policies

Biodiversity Net Gain

8.6.3.1   *"Biodiversity is essential to sustain our society and economy. Enhancing biodiversity is integral to sustainable development, and Biodiversity Net Gain is an approach to embed and demonstrate biodiversity enhancement within development. It involves first avoiding and then minimising biodiversity loss as far as possible, and achieving measurable net gains that contribute towards local and strategic biodiversity priorities[34]."*

8.6.3.2   Biodiversity Net Gain is a new approach to development and land management that aims to leave the natural environment in a measurably better state than before. The NPPF [35] and Policy NE1 of the Local Plan already require development to deliver net gains in biodiversity. The Council will ensure that all development delivers a net gain for biodiversity through appropriate habitat creation, restoration or enhancement. The delivery of which should, in the first instance, be on site. Should an offsite solution be considered the most appropriate and effective route to achieving net gain the Council will ensure these actions are secured via planning conditions and obligations.

8.6.3.3   The monitoring, maintenance and management of any offsite provision will potentially be secured through the use of 'conservation covenants' and monitoring requirements expected to be brought into use through the Environment Bill.

8.6.3.4   In order to accurately determine whether a net gain in biodiversity can be delivered by development, the Council expects that, when requested, a precise ecological assessment by a suitably qualified person will be undertaken to accepted national standards.

8.6.3.5   During this process a 'biodiversity gain plan' should be submitted that measures habitat extent, distinctiveness, condition, connectivity and strategic significance - calculating the sites biodiversity units both before and after development. The Council considers that the use of the Government's published Biodiversity Metric (currently v.2.0) is the appropriate mechanism for determining and quantifying a sites existing biodiversity value and the consequent measures required to ensure biodiversity net gain through development is achieved.

8.6.3.6   Any compensatory proposals must deliver habitats of greater biodiversity value than of those being lost through development. The Council considers the minimum biodiversity uplift development schemes must deliver to be 10% above the biodiversity unit value of the habitats to be lost. This is in keeping with the 'replacement percentage' proposed by the 2020 Environment Bill, which has been supported by a full economic impact assessment.

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34   Baker J. et al. (2019) Biodiversity net gain. Good Practice Principles For Development: A Practical Guide

35   Paragraph 170, National Planning Policy Framework (2019)

8.6.3.7   Any off site contributions required to achieve Biodiversity Net Gain will be delivered in line with local, regional and national priorities for nature conservation and directed by a borough wide Local Nature Recovery Strategy. This strategy will be published at the Draft Plan stage of the Review and will identify a suite of sites capable of acting as a provisional local Habitat Bank. The Council will also set out the process to be followed in greater detail. This approach will eventually be incorporated into the proposed 'Designing Naturally' SPD.

8.6.3.8   The Council will also utilise updated accessible green space mapping (ANGSt), updated accessible woodland (AWS) mapping and outdoor recreational value calculations (ORVal) of key sites to ensure the delivery of biodiversity net gain does not negatively impact upon local communities' ability to access the natural environment.

New Policy: Biodiversity Net Gain

Proposals:

1.   Ensuring all development delivers at least a 10% net gain for biodiversity through appropriate habitat creation, restoration or enhancement.

2.   Measuring net gain through the use of the Government's published Biodiversity Metric (currently v.2.0).

3.   Directing offsite habitat delivery through a Nature Recovery Network.

4.   Establishing a provisional local habitat bank.

Question 33

Do you agree with the Council's response to the proposals to mandate Biodiversity Net Gain through the Environment Bill? Are there any other proposals to delivering Biodiversity Net Gain that the Council should consider?

Urban Greening

8.6.3.9   Urban Greening is an integrative approach that aims to increase the quality, quantity and functionality of green infrastructure across the built environment. It uses a simple process that quantifies the amount of green infrastructure a development provides, providing an Urban Greening Score between 0 and 1. Green Infrastructure elements can include the retention of semi-natural vegetation, the provision of street trees, hedges, areas of flower rich perennial planting, bird and bat boxes, green roofs, green walls, ponds, wetlands and sustainable drainage systems, including vegetated swales, rain gardens and permeable paving.

8.6.3.10   By clearly setting out an appropriate minimum Urban Greening Score in the Local Plan that all developments must achieve, developers and planners can have increased confidence during the site master planning and application process.

8.6.3.11   It is proposed that at the Draft Plan stage the Council will produce a Topic Paper that will set out how the Council would expect Urban Greening Scores to be calculated, 'weighting' the scoring of each individual element of Green Infrastructure in order to locally tailor the approach - enabling future development to help address local issues such as surface water flooding and the effects of the urban heat island effect. Weighting will also address the provision of appropriate levels of accessible local green space, identified through updated ANGSt mapping, and provision of woodland canopy cover, identified through updated canopy cover calculations and woodland opportunity mapping.

New Policy: Urban Greening

Proposals:

1.   Identifying local need:

a)   Locally tailoring an Urban Greening Score for Telford and Wrekin.

b)   Using an emerging national urban greening standard of 0.3-0.4.

2.   Defining the size of developments required to deliver urban greening:

a)   Applying Urban Greening requirements to all developments, or

b)   Limiting the policy to major developments only.

3.   Defining the spatial extent of where urban greening measures will be required:

a)   Requiring all developments within the borough to deliver urban greening, or

b)   Limiting the requirement for urban greening to the urban areas (as defined by Figure 5 in the adopted Local Plan) and sustainable urban extensions.

Question 34

Which of the above proposals do you think should be pursued? Are there any other proposals you wish the Council to consider?

Question 35

Are there any other proposals to the delivery of green infrastructure within the built environment that the Council should consider?

8.6.4 Policies proposed to be retained with no changes

8.6.4.1   The following Natural Environment policies will be retained with no proposed changes:

- NE6 Green Network.
- NE7 Shropshire Hills Area of Outstanding Natural Beauty AONB & Strategic Landscapes.

Question 36

Do you have any other comments to make on the Natural Environment chapter?

8.7 Community

8.7.1 Introduction

8.7.1.1   The Local Plan has secured new local centres, community facilities and new and expanded schools through the planning process. The Plan seeks to protect, enhance and deliver new facilities through Policy COM1 and encourages the provision of cultural facilities in Policy COM2. The impact of Covid-19 has shown the value of local community facilities to residents and workers.

8.7.1.2   Community facilities should be protected in the first instance in their current use and secondly as an alternative community facility. However, there must also be flexibility in understanding that not all community facilities will continue to have a viable use and other uses may be more appropriately introduced. Significant new developments should include provision for community facilities whether through the planning application or to be provided by financial contribution.

Changes to consider

8.7.1.3   The NPPF[36] provides significant support for the provision and retention of social, recreation and cultural facilities and services by achieving the following:

- Planning positively for the provision and use of shared spaces, community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environment;
- Taking into account and supporting the delivery of local strategies to improve health, social and cultural well-being for all sections of the community;
- Guarding against the unnecessary loss of value facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;

- Ensuring that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community; and
- Ensuring an integrated approach to considering the location of housing, economic uses and community facilities and services.

8.7.1.4   In July 2020 the Government introduced a revised Use Class Order grouping numerous uses together. Some local community facilities may be affected, for example:

- More protection for public houses (now classed as sui generis) where a change of use will now require planning permission.
- A new use class (F.2) which covers essential local facilities such as small local shops and community halls/meeting places. By separating these uses from the new "commercial, business and service" there is the potential that less essential local facilities could be lost through permitted development.

8.7.1.5   Whilst much investment has gone into new and expanded community facilities in the borough including schools, sports facilities and cultural facilities there has been a decline in other areas. Facilities such as public houses have struggled in recent years with a number of sites falling vacant across the borough where there traditional role as a community meeting place has declined.

Telford Town Park

8.7.2 Policies to be retained and amended

Community facilities (Policy COM1)

8.7.2.1   Policy COM1 seeks to identify how the borough should meet the needs of existing and new communities through the maintenance and enhancement of existing community facilities and the provision of new community facilities. In practice it has become clear that this policy should be amended to clarify the protection afforded to facilities such as Public Houses in line with the NPPF.

8.7.2.2   There is additional scope for the policy to clarify when financial or other contributions (such as land in kind) will be sought for the upgrade, enhancement and provision of new community facilities. Further clarification around financial contributions in lieu of on-site provision of facilities could be provided where, for example, a number of developments could contribute towards the upgrade, enhancement or provision of new facilities in an area.

Policy COM1: Community facilities

Approach:

Clarify community facilities in line with the NPPF and update the provisions for loss of and provision of community facilities.

Proposals:

1. Review the current definition of community facility in paragraph 7.0.1 and extend the definition to include other community uses such as public houses as referenced in the NPPF.
2. Clarify the circumstances where contributions would be sought for on and off site upgrade, enhancement and provision of new community facilities.
3. Review and clarify the circumstances where the loss of a community facility will be supported including after an appropriate period of marketing the facility.

Question 37

Do you agree with the policy proposals set out above? Are there are other proposals the Council should consider?

8.7.3 Policies proposed to be retained with no changes

8.7.3.1   The following policy is proposed to be retained with no changes:

- COM2 Culture.

Question 38

Are there any other comments you would like to make on this section?

8.8 Connections

8.8.1 Introduction

8.8.1.1 Connectivity describes how well places within the borough are connected to each other through a variety of transportation methods, as well as the coverage and quality of communication networks. The challenge for the borough is to use the Local Plan to re-shape and create an urban form and density that is more conducive for cycling, walking and public transport provision – in addition to supporting the use of electric vehicles. Such active travel measures can promote healthy lifestyle behaviours which in turn has positive benefits for the mental and physical health and wellbeing of residents and workers.

8.8.1.2 The current Telford & Wrekin Local Transport Plan 2011 - 2026 (the LTP) also identifies the need to make better use of the existing infrastructure, acknowledging that the car will remain essential for many journeys, particularly long distance trips. Key issues include managing traffic from new developments, providing access to key services, accommodating increasing travel without increasing carbon emissions, maintaining reductions in road traffic casualties; creating an urban form that encourages cycling and walking trips, and enhancing the image of public transport. The LTP is to be reviewed and will take account of the Local Plan Review emerging strategy and policies.

Telford Cycle Route

8.8.1.3 Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should allow the delivery of high quality digital infrastructure in order to maximise economic growth and the benefits this will bring.

8.8.2 Policies to be retained and amended

Sustainable Transport and Highways (Policies C1 and C4)

8.8.2.1 Policy C1 sits alongside the LTP in its mission to encourage sustainable alternatives to car travel. For the purposes of the Local Plan sustainable modes include walking, cycling, bus and rail travel. No major changes to the policy are proposed; however, the opportunity to review policy requirements including the policy position on Area Travel Plans will be considered.

8.8.2.2   Two main issues have been identified with Policy C4. Firstly, increasing workloads and budget restrictions have made it increasingly difficult to manage landscaping on highways. For example, where tree lined highways are proposed these could be located within the curtilage of residential properties which would not compromise the overall visual concept of the green streetscape. The second issue concerns street lighting positions not being considered as part of submitted landscape plans. Landscaping and tree schemes have been approved only to be compromised by street lighting, resulting in a negative visual impact on the street scene. Policy C4 could also refer to provision of on-street electric vehicle charging points and the provision of this facility in shared parking areas within developments.

Policy C1: Promoting alternatives to the car

 Approach:

Strengthen the level of support for sustainable transport options.

Proposals:

1.   Review the position on Area Wide Travel Plans and consider site travel plans in support of sustainable and active travel.

2.   Clarify the need to enhance the 'connectivity' of walking and cycle routes to destinations such as town, district centres, employment sites and green spaces.

3.   Include specific reference to the enhancement of Public Rights of Way alongside strategic walking and cycling routes.

4.   Provide onsite walking and cycling infrastructure that allows access to the wider network as well as providing space for walking, cycling and jogging.

Question 39

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

Policy C4: Design of roads and streets

Approach:

Recognise the policy's contribution to tackling climate change and urban greening.

Proposals:

1.   Include reference to street trees (where proposed) being placed within the curtilage of residential properties where it is appropriate and safe to do so.

2.   Include the requirement for street lighting position to be submitted as part of landscaping/tree schemes.

3.   Include reference to electric vehicle charging points for on-street and shared parking in developments.

Question 40

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

Parking (Policy C5)

8.8.2.3   Policy C5 provides for a mix of parking including residential, commercial and Town Centre provision that is important to the vitality of the borough but the needs and demands are changing and flexibility is needed to respond. It is proposed the associated parking standards (set out in Appendix F of the Local Plan) are removed and separate planning guidance is produced. This would allow the Council to review and update the standards in line with changing national and local context without the need to wait for a Local Plan review. This will allow the Council to respond with greater flexibility to the needs of development proposals. It is proposed that Policy C5 makes appropriate reference to the need to provide levels of parking in line with 'latest' guidance.

8.8.2.4   Electric vehicles now represent an increasingly accessible alternative to petrol and diesel cars. Government announcements on the ban on the sale of diesel, petrol and hybrid cars will be brought forward to 2035 and accelerate the market for electric vehicles impacting on manufacturing and supply changes as well as infrastructure to support the charging of vehicles. The borough remains highly dependent on car use and coupled with the Council declaring a climate emergency, the review of the Local Plan means that now is the time to future proof for the network of charging infrastructure that will be required to support the switch. The Government have consulted on proposals to make electric vehicle charging points mandatory in all new homes; the Review will consider how electric vehicle charging can be delivered in the borough.

Policy C5: Design of parking

Approach:

Update the policy to support carbon neutrality in new developments.

Proposals:

1.   Introduce requirement for the provision of electric vehicle charging points in all new residential developments, including communal parking areas. This could be a requirement to provide appropriate cabling or universal charging point.

2.   Introduce requirement for electric vehicle charging points in all non-residential developments that require parking provision. This could include the provision of a certain percentage of charging points as well as infrastructure such as ducting and cabling to support the installation of more points as and when they are needed.

3.   Associated Parking Standards (Appendix F) – development of separate planning guidance for parking standards.

Question 41

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

Communications (Policy C7)

8.8.2.5   Better communications networks will play a key role in the delivery of the 'internet of things' which will be focused around 5G networks. This digital infrastructure will help facilitate changes in the way we work, the way we interact and spend leisure time. It will also address issues of digital poverty that continue to exist in the borough.

8.8.2.6   Communications policy will be updated as it refers to the Council's superfast broadband programme that has now been completed. The policy also needs to reflect the increased need for the connectivity of residential and non-residential developments to the internet.

Policy C7: Enhancing communications network

Approach:

Update and strengthen policy in light of changing focus on digital infrastructure, opportunities to deliver 5G networks and ensuring the delivery of connected communities.

Proposals:

1.   Update outdated text referring to information.

2.   Consider development implications of 5G infrastructure and whether they need reflecting in policy.

3.   Strengthening the policy to require all new developments (residential and non-residential) to install infrastructure to support digital connectivity of properties.

Question 42

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

8.8.3 Policies proposed to be retained with no changes

8.8.3.1 The following policies to proposed be retained with no changes:

- C2 Safeguarding rail and transport corridors.
- C3 Impact of development on highways.
- C4 Design of roads and streets.
- C6 Commuted parking payments.
- C8 New telecommunications development.

Question 43

Are there any other comments you would like to make on this section?

8.9 Built environment & heritage

8.9.1 Introduction

8.9.1.1 A key role of the Local Plan is to ensure development proposals deliver good design and respect the character and heritage of the local area. The borough has a rich and diverse heritage including a World Heritage Site, seven Conservation Areas, 12 Grade I, 53 Grade II* and 778 Grade II Listed Buildings. The Council also has approximately 550 non designated heritage assets which are valued locally due to their contribution to community identity or role as important landmarks.

8.9.1.2 Local plan policies cover development design criteria, residential alterations and extensions, design, historic environment designations (and non-designated heritage assets), and land stability and contamination.

8.9.1.3 Government guidance[37] sets out a blueprint for how local planning authorities can achieve quality and good design. The Government will introduce a National Model Design Code setting out detailed standards for key elements of successful design. Regionally, the West Midlands Design Charter[38] aims for high quality design in places and spaces and the Charter can be used as an extra tool for local planning authorities.

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37   National Design Guide (2019), Ministry of Housing, Communities and Local Government
38   West Midland Design Charter (2020), West Midlands Combined Authority

8.9.2 Policies to be retained and amended

Design Policies (BE1 and BE2)

8.9.2.1 Policy BE1 considers key aspects of design. The policy could be expanded to reflect updated national and regional guidance and to strengthen links with the review's proposed strategic priorities including climate resilience and mitigation, and health and wellbeing. This could include:

- Promoting good links, focusing on increasing the use of public transport, cycle ways and public footpaths, while decreasing the need for motor vehicles through integrated design;
- Delivering new developments that respond robustly to the challenges of climate change through the integration of green infrastructure and urban greening, as well as creating sustainable layouts and orientation, incorporating design features that facilitate energy efficiency;
- Better design to ensure intergenerational accommodation, including specialist accommodation e.g. for those with mental or physical health issues such as dementia;
- Promoting healthy lifestyle behaviours and environments through design;
- Supporting modern methods of construction encompassing the latest development in material, technology, design procedures, quantity surveying, facilities management, services, structural analysis and design, and management studies; and
- Ensuring the protection and enhancement of the natural and built environment for the long term benefit of communities.

8.9.2.2 At the local level the National Design Guide (2019) considers that detailed and measurable criteria for design that can be set out. Tools including workshops, design advice/review services, design codes and guides such as the West Midlands Design Charter could be encouraged through policy.

8.9.2.3 Policy BE2, which addresses residential alterations and extensions, could promote sustainability in smaller residential development proposals. The policy could also include other design issues including safety and security, designing out crime, and the protection of significant or prominent trees or other natural landscape features impacted by proposals.

Policy BE1: Design criteria

Approach:

Strengthen the policy to ensure good design is achieved for the future plan period.

Proposals:

1. Consider expanding criteria within the policy to address the contribution design can make to areas such as community wellbeing, sustainable travel as well as better places to live and work.

2. Consider expanding the criteria to ensure high quality design of major and larger sites includes Sustainable Urban Extensions, as referenced in Policy HO2.

3. Strengthen criteria which contributes towards climate neutrality including, for example, the delivery of renewable energy, urban greening and connectivity to green space.

4. Consider the need for additional supporting guidance to reinforce climate resilience, climate mitigation and latest design principals in design of new developments.

Question 44

Do you agree with the policy proposals set out above? Are there any other proposals that should be considered in the design criteria?

Policy BE2: Residential alterations

Approach:

Strengthening the policy to consider all impacts of alterations and extensions.

Proposals:

1. Strengthen the policy wording to better reflect the contribution of the policy towards climate neutrality including the need for renewable energy provision in new development, protection of existing trees, the layout of development and the potential for greening measures such as new trees.

2. Include criteria covering reasonable regard to safety and security of developments.

Question 45

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

Heritage and conservation (Policies BE3, BE4, BE5 and BE6)

8.9.2.4   Policy BE3 determines the long term protection and enhancement of the World Heritage Site (WHS) and its outstanding universal value. The policy needs to balance protection alongside the management of new development within the WHS. In recent years there has been a number of new developments within the area including infill development and it therefore may be appropriate to consider the control of new development in the WHS.

8.9.2.5　　New development can have a role to play in mitigating the impact of climate change, this is especially the case in balancing the need to reduce the environmental impact of visitors whilst maintaining the economic benefits to the area. This could be through encouraging development of sustainable travel options as well as seeking high standards of design in new developments and improving the energy efficiency of older buildings through a holistic approach that uses an understanding of a building, its context, its significance, and all the factors affecting energy use.

8.9.2.6　　The Policy could consider the identification and protection of gateways and approaches to the WHS within and in some cases outside the boundary. Gateways into the WHS have a major impact on first impressions and design aspects could therefore be a consideration within the policy.

8.9.2.7　　There is a need to clarify wording of the Policy BE6 (Buildings of local interest) that the 'list of buildings of local interest' are non-designated heritage assets as per the NPPG[39] definition. To distinguish between the two a description of what is considered locally listed buildings (non-designated heritage asset) and listed buildings (designated heritage assets) is needed.

8.9.2.8　　Consideration should also be given to the impacts of significant planning applications in the area, including the redevelopment of the Ironbridge Power Station Site, which is expected to provide up to 1,000 new homes, businesses and other uses in close proximity to the WHS. Careful consideration is needed to align the policy with the potential impacts of new development, minimising the potential implications to the WHS including harm to setting, traffic and increased pressure on local services. Telford and Wrekin Council, in partnership with Shropshire Council and the developers are proactively working to provide long term protection for the WHS, to ensure a positive outcome.

8.9.2.9　　Limited changes to Policies BE4 and BE5 are proposed such as the consideration of development that might affect the 'setting' of listed buildings and conservation. The Council is also considering an Article 4 direction introducing the need for planning permission when looking to demolish buildings of local interest.

Policy BE 3: Ironbridge Gorge World Heritage Site

Approach:

To highlight the importance of the WHS and expanding the policy to reflect future challenges.

Proposals:

1. Amend the policy to reflect the impact of climate change on the built and natural heritage environment within the WHS.

2. Consider tighter controls on in fill and new development within the WHS area.

3. Include criteria to control protect and enhance gateways and approaches into the WHS.

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39   National Planning Policy Guidance, paragraph 39.

Question 46

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

Policies BE 4 (listed buildings) and BE 5 (conservation areas)

Approach:

Clarification of policy wording.

Proposal:

1.   To consider rewording the policies to take into account the setting of Listed Buildings and Conservation Areas.

Question 47

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

Policy BE 6: Buildings of local interest

 Approach:

Clarification of policy wording.

Proposals:

1.   To amend the wording of the policy to clarify and distinguish between buildings of local interest as non-designated heritage assets.

2.   To consider the possible implementation of an Article 4(2) direction to require prior notification for the demolition of buildings of local interest.

Question 48

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

Land stability and land contamination (BE9 and BE10)

8.9.2.10   The planning system works alongside other systems including Building Regulations, which seek to ensure that any development is structurally sound. The Coal Authority is responsible for public safety risks arising from past coal mining activities and dealing with proven claims for subsidence under the Coal Mining Subsidence Act 1991 and the Coal Industry Act 1994. The Mines and Quarries Act 1954 requires safeguarding of mine entries once they are abandoned to protect health and safety.

8.9.2.11   An additional criterion within Policy BE9 could require an assessment of land stability to the satisfaction of the Local Planning Authority, with a land stability report provided and agreed before an application is determined. Another criterion could reinforce the importance of remedial works prior to occupation of the development.

Lloyds Cottage, Ironbridge

8.9.2.12   The supporting text to Policy BE10 could clarify what is considered to be contaminated land i.e. hazardous or toxic materials. The text could also state the potential threat of contaminated land if not dealt with; that is, the risk to human health or serious pollution to water quality and/or biodiversity. Further references could be made to the remediation and mitigation of despoiled, degraded, derelict, contaminated, or unstable land, with the onus on the developer and/or landowner for securing safe land/development free from pollution[40]. The policy could also require site investigation and a risk assessment to be undertaken by a suitably qualified competent person[41] in accordance with established practices such as BS10175 (2017) 'Code of Practice for the Investigation of Potentially Contaminated Sites.

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40   Paragraph 179, National Planning Policy Framework (2019)
41   Annex 2, National Planning Policy Framework (2019)

8.9.2.13   Reference should be made to the system for identifying and remediating statutorily defined contaminated land under *Part 2A of the Environmental Protection Act 1990*, which provides a risk based approach to the identification and remediation of land where contamination poses an unacceptable risk to human health or the environment.

Policy BE 9: Land stability

Approach:

Clarify the requirements of the policy.

Proposals:

1.   To amend the policy to include clearer guidance on planning application requirements relating to land stability.

2.   Clarify the need for remedial works to have been undertaken prior to occupation of a development to the satisfaction of the Local Planning Authority.

3.   Include the need for proposals to be in accordance with relevant legislation related to land stability.

Question 49

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider? Are the issues of land stability appropriately located within this section of the Local Plan?

Policy BE 10: Land contamination

Approach:

To provide clearer guidance with relevant legislation.

Proposals:

1.   Strengthen the policy in relation to the purpose of addressing land contamination and the onus placed on the developer / landowner to secure development free from pollution.

2.   To amend the policy to include clearer guidance on planning application requirements relating to land contamination including a site investigation report provided by a qualified competent person.

3.   To amend the supporting text to include references to relevant legislation.

8.9.3 Proposed new policies

Private amenity space

8.9.3.1   Private amenity space refers to a garden or balcony area directly accessible via a residential dwelling. This space is important to provide privacy, open outlook, light and fresh air for safe recreation and storage. It can also provide mental and physical health benefits to residents and visitors and avoid over densification of development. While there are standards for internal space (set out within the Nationally Described Space Standards[42]) there are no national standards for private amenity space within residential units. If the Council were to introduce a space standard for private amenity it would need to establish whether the introduction of standards is needed.

8.9.3.2   Private and outdoor amenity space can assist in mitigation of climate change with vegetation that contributes to biodiversity and space that is multi-functional; for socialising, play, and sport, food growing and gardening. The provision of space that is easily accessible and designed in the context of local character will assist in providing a sense of ownership to the local community and will contribute to the health, well-being and perception of safety and security.

New policy: Private amenity space

Approach:

Introduce policy to ensure adequate space is sought in the design of residential developments and buildings.

Proposals:

1.   To create a new policy ensuring high quality design that enhances and respects local character and explains the requirements of private amenity space for residential units.

2.   To amend Policy BE 1: Design Criteria referencing the need for adequate amenity space.

3.   Set out exceptional circumstances where development of garden property could be supported.

4.   Set out the standards in a form of appendices to the Local Plan or through separate planning guidance.

42   Technical Housing Standards – Nationally Described Space Standards (2015)

8.9.4 Policies proposed to be retained with no changes

8.9.4.1   The following policies are proposed to be retained with no changes:

- BE 7 Parks and gardens of historic interest.
- BE 8 Archaeology and scheduled ancient monuments.

8.10 Environmental resources

8.10.1 Introduction

8.10.1.1   Several local plan policies seek to mitigate and adapt to the causes and effects of climate change and managing environmental resources. However going forward all policy will need to be considered in the context of the contribution it makes or impact upon, the achievement of the Council's aspiration for borough-wide carbon neutrality by 2030.

8.10.1.2   The Government is consulting on proposals to increase the energy efficiency requirements to future-proof homes with low carbon heating and world-leading levels of energy efficiency to be introduced by 2025, including no new gas connections after 2025.

8.10.1.3   The Council's Becoming Carbon Neutral Action Plan, describes the initial actions we will take to achieve the commitment for Council operations and activities to be carbon neutral by 2030. The action plan also includes aspirations for the borough to achieve carbon neutrality by 2030. Progress towards meeting these goals will be measured through the Telford & Wrekin Council Becoming Carbon Neutral Action Plan and through the Annual Monitoring Report. In light of these circumstances, the opportunity will be taken in the Review to ensure that policies are robust, justified and challenging enough to contribute towards the Council's Climate Emergency declaration.

8.10.2 Policies to be retained and amended

Renewable energy (Policy ER1)

8.10.2.1 The Local Plan encourages low carbon and renewable energy generation infrastructure. The Council continues to see low carbon development, energy conservation and development adapted to impacts of climate change as issues of great importance. However, investment in new renewable energy generation has reduced significantly since 2015 due to restrictive national policy and the reduction of renewable incentives such as feed in tariffs.

8.10.2.2 The review is an opportunity to increase the use of renewable generation within new developments (housing, industrial and commercial). This could include measures for individual properties or at scale as part of a larger development. Renewable generation as part of regeneration and renewal schemes could be a really useful measure in reducing energy cost especially on affordable housing schemes or supported accommodation.

8.10.2.3 The Council has taken the lead on renewable generation projects in the borough including the Combined Heat and Power system serving the Southwater area of Telford Town Centre and Solar Farm. Where larger industrial and commercial sites come forward the policy could seek the development of on-site generation at scale to serve multiple buildings, this could include CHP plants, solar and in some cases potentially wind power.

Telford Solar Farm

8.10.2.4 The Council could consider whether it is best to allocate sites for renewable energy production or to indicate suitable areas for such developments, especially for wind energy development. Currently, wind turbines are not supported as a type of renewable energy development in Policy ER1.

The **Call for Sites is currently open and the Council is seeking submissions for land for renewable energy development** further information is available and submissions can be made at www.telford.gov.uk/callforsites.

8.10.2.5   Issues to consider for renewable energy development:

- The Council cannot approve new turbines without a site allocation or identification of areas suitable for wind energy development through the Local Plan review or Neighbourhood Development Plans.
- The current position of the Local Plan is that NDPs should allocate land for wind turbines – given the need to address climate change this position needs to be reconsidered.

8.10.2.6   Recognising that not all new development opportunities will be able to provide carbon mitigation there could be provision in policy to seek 'carbon off-setting' in the form of financial contributions that could be used to provide benefits elsewhere in the borough. There are potential exceptions where this maybe the case including the conversion of older buildings.

Policy ER1: Renewable energy

Approach:

Strengthen the support for renewable energy development.

Proposals:

1.   Review effectiveness of current policy criteria in enabling renewable energy development.

2.   Consider direct allocation of sites for renewable energy generation including the identification of sites and areas suitable for wind powered generation.

3.   Provide minimum % requirement for renewable energy usage on sites over a certain size threshold.

4.   Criteria which requires an incorporation of onsite renewable energy generation on new employment and commercial sites over a certain threshold – this could include wind, combined heat and power and solar generation serving multiple properties.

5.   Potentially allowing for carbon offsetting in certain circumstances.

Question 53

Should the Council continue with the current criteria-based policy; allocate sites for specific renewable energy development or identify broad areas which we consider suitable?

Water conservation and efficiency (Policy ER10)

8.10.2.7 The Council recognises the positive contribution that water sensitive design can make to the security and conservation of the borough's water supplies and protect existing water sources. Therefore, The Council will continue to encourage major development to incorporate design features commensurate with the scale and type of development that will support recycling and re-use of water to offset demand for potable water supplies.

8.10.2.8 A measure that the Council could consider is to increase the required water efficiency standards as set out in the Building Regulations – Approved Document G. The current standard is efficiency to limit consumption to 125 litre per person per day with the optional require of increasing efficiency to 110 litre per person per day. The Council could through the review process specify an increase in water efficiency standards subject to appropriate evidence.

Policy ER10: Water conservation and efficiency

Approach:

Consider expansion of water conservation and efficiency policy to a wider range of developments.

Proposals:

1.   Adopt a higher standard of water efficiency in all new buildings.

2.   Strengthen the policy by requiring major developments to incorporate water conservation/efficiency design measures.

Question 54

Do you agree with the policy proposals set out above? Are there any other proposals the Council should consider?

8.10.3 Policies proposed to be retained with no changes

8.10.3.1   The following policies are proposed to be retained with no changes:

- ER2 Mineral safeguarding.
- ER3 Maintaining supplies of crushed rock.
- ER4 Sand and gravel resources.
- ER5 Maintaining supplies of brick clay.
- ER6 Mineral development.
- ER7 Waste management facilities.
- ER8 Waste planning for residential developments.

- ER9 Waste planning for commercial, industrial and retail developments.
- ER11 Sewerage systems and water quality.
- ER12 Flood risk management.

Question 55

Are there any other comments you would like to make on this section?

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9 Next Steps

9.1 Introduction

9.1.1 This section sets out the next steps in the review process as well as summarising work that is currently underway that will feed into the Preferred Options Stage.

9.2 Call for sites and SHELAA

9.2.1 To accompany the review process the Council have commenced a 'Call for Sites' to establish what land is available for development in the borough. This can be for a range of uses including employment, renewable energy, community facilities and housing.

9.2.2 The land submitted through the Call for Sites will be assessed as part of the Strategic Housing & Employment Land Availability Assessment (SHELAA). This will assess submitted sites on the basis of whether they are:

- Suitable for development.
- Available for development.
- Achievable – can deliver development.

9.2.3 From the SHELAA, the Council's planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. The SHELAA does not allocate sites. The Local Plan will determine which of those sites are the most suitable to meet requirements. The site selection methodology (Appendix 1) will test sites against assessment criteria including development constraints, compliance with the preferred strategy for development, sustainability appraisal and planning judgement. Through this process, a shortlist of suitable, sustainable and deliverable sites will be identified.

9.2.4 The SHELAA will be published following the close of the Call for Sites in January 2021, and the findings will be used as the starting point for selecting land allocations to meet the required development needs of the borough. The SHELAA methodology has been appended to this document and provides further information.

Submitting land to the Call for Sites

The review forms a critical element of the Councils Covid-19 Recovery Strategy and is a real opportunity to ensure that the Telford & Wrekin Economy is well placed to 'bounce back'. At this stage the Council are asking landowners and developers to consider what land they have available to help with the recovery process and facilitate inward investment and economic growth as well as housing to meet local needs.

Telford has a strong economic track record and this is demonstrated most clearly in the inward investment the borough has seen over recent years. The Council want this to continue and the economy to thrive. To achieve this **the Council are first and foremost seeking submissions to the Call for Sites for employment land opportunities.** This includes existing businesses which may have land that could be developed to enable them to grow on site or reinvest within the business.

If you have land that is available for development we want to hear from you or your representatives. You can submit land for consideration at www.telford.gov.uk/callforsites. Initially we need the application form with a redline boundary plan of the land for consideration, any further supporting information can follow.

The deadline for submissions is 8 January 2021.

9.3 Integrated appraisal

9.3.1   An Integrated Appraisal (IA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies and is a legislative requirement. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The IA Scoping Report will be published alongside the Issues & Options consultation document.

9.3.2   The production of the IA must be in line with National Planning Practice Guidance and be produced with in line with the following regulations and legislation:

- Section's 19 and 39 of the Planning and Compulsory Purchase Act 2004.
- Environmental Assessment of Plans and Programmes Regulations 2004.
- Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

9.3.3   Consultation will be required with key statutory stakeholders in the development of the IA including:

- The Environment Agency.
- Historic England.
- Natural England.
- Any other parties the Council deem necessary to the production of the IA.

9.3.4   The Integrated Appraisal (IA) will comprise of a 'Sustainability Appraisal' or SA and a 'Habitat Regulations Assessment' or HRA. The IA will be used to inform the review of the Telford & Wrekin Plan and will need to meet the requirements as for Sustainability Appraisals and Habitat Regulations as set out in the National Planning Policy Guidance. The IA will also include a Health Impact Assessment (HIA) and an Equalities Impact Assessment (EqIA).

9.3.5 IA documents will be completed in advance of key stages of consultation for the review. The stages of the IA are defined below:

- **Stage A: Scoping Report -** Setting the context and objectives, establishing the baseline and deciding on the scope of IA report.
- **Stage B: IA of Draft Plan -** Developing and refining alternatives and assessing effects.
- **Stage C: IA of Publication Plan -** Prepare the sustainability appraisal report.
- **Stage D: Incorporate comments on Publication Version into IA Report -** Seek representations on the sustainability appraisal report from consultation bodies and the public.
- **Stage E: Adoption Statement -** Post adoption reporting and monitoring.

9.4 Duty to Cooperate

9.4.1 Local authorities are expected to address strategic cross boundary matters in development plans and demonstrate how they have engaged in strategic planning through the 'Duty to Cooperate'. This is a legal obligation and a matter of soundness that the Council is required to comply with.

9.4.2 The Duty to Cooperate is not a 'duty to agree'. However, all local planning authorities are expected to demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their local plans are submitted for examination. Where there are cross boundary matters local authorities discharge this Duty by agreeing memoranda of understanding. The Council will engage with nearby local authorities in the review of the TWLP and will continue to be engaged with them as they prepare their Local Plans/documents.

9.4.3 The Council have been approached by the Association of Black Country Authorities (ABCA) to assist in meeting a contribution towards meeting their unmet development needs. The Council at this early stage in the review process maintain the view held at the Examination of the TWLP that sufficient evidence is not yet available to support such a request. The Council will continue to engage in dialogue with the ABCA and keep this issue under review as work on the TWLP review progresses.

9.4.4 There are a range of statutory bodies that the Council will also be engaging with including:

- The Environment Agency.
- English Heritage.
- Natural England.
- Civil Aviation Authority.
- Homes England.
- Telford & Wrekin Clinical Commissioning Group.
- Office of Road and Rail Regulation.
- West Midlands Combined Authority (Integrated Transport Authority).
- Highways England.
- Local Highways Authority.
- Marches Local Enterprise Partnership.
- Other Local Planning Authorities.

9.4.5   The Council will at each stage inform the above agencies and authorities of progress with the review and will where issues are identified engage directly and appropriately with them.

9.5 Telford & Wrekin's role in the region

9.5.1   The Council is actively involved in wider partnerships including as part of Marches Local Enterprise Partnership (LEP), as a non-constituent member of West Midlands Combined Authority and a member of the River Severn Partnership. Council representations in these organisations helps to:

- Secure infrastructure funding.
- Influence policy at regional and national level.
- Secure direct investment in bringing forward brownfield land.
- Share information and costs associated with planning large infrastructure schemes.

Marches LEP – The LEP are responsible for setting the economic direction for the Telford & Wrekin, Shropshire and Herefordshire through the Strategic Economic Plan and Local Industrial Strategy. Both these documents help to identify areas of opportunity and development in economic and industrial sectors for the area. The Council continue to work closely with the Marches LEP to secure infrastructure investment in borough, to date this has amounted to £29m. This relationship will be crucial to funding further investment in unlocking land for development and gap funding the provision of infrastructure.

West Midlands Combined Authority (CA) – The CA are not a planning authority, however they do have a key role to play in funding and supporting the delivery of employment and housing development across the West Midlands. The CA are and will continue to be a source of funding for bringing forward sites as well as directly funding infrastructure projects. The Strategic Infrastructure Delivery Plan identifies the M54 (road and rail) and A41 corridors as having significant growth potential, with the ultimate aim of producing investment prospectuses for both routes. The CA is also providing policy support to Local Planning Authorities around issues such as Advanced Methods of Construction, Zero Carbon Homes and regeneration projects.

River Severn Partnership – The partnership has been established to address flood risk along the Severn corridor with the aim of improving economic resilience and realising new economic opportunities. The partnership will play a key role in helping to address local issues such as flooding in the World Heritage Site, how best to protect properties and communities in the Gorge and as a source of support in bids to fund infrastructure. The work of the partnership will also support the Council's climate change action plan through the planning and delivery of natural flood storage schemes.

9.6 What happens after the Issues & Options consultation

9.6.1   Following the Issues and Options consultation the Council will consider representations received and prepare further evidence work to develop proposals for the Preferred Options Stage of the review. This will also include:

- Publishing the findings of the Strategic Housing & Employment Land Availability Assessment (SHELAA).
- Progressing the site selection process – using the site selection methodology appended to this document.
- Sourcing any further evidence required in advance of the Preferred Strategy phase.

9.6.2   Further key dates are set out in the table below.

Table 3: Key Dates

Phase	Dates
Cabinet approval to consult on Preferred Options Stage (Draft Plan)	Spring 2021
Cabinet approval to consult on Publication Version	Autumn 2021
Submission Version for Examination	Subject to Planning Inspectorate timetable
Adoption	

10 Appendix 1: Site selection methodology

Context & background

10.1   This annex provides details of the site selection methodology proposed by the Council as part of the review of the TWLP. The review will inform the requirements for and supply of, further development land across the borough. The type of sites to be allocated could include land for employment, housing, mixed use development sites (employment, housing etc.), minerals sites, sites supporting renewable energy provision and sites that support the needs of different groups in the community, such as Gypsy & Traveller sites.

10.2   In order to identify land to accommodate future growth, the Local Plan Review will consider a variety of sites including those put forward through the Call for Sites and SHELAA (Strategic Housing and Economic Land Availability Assessment) processes to determine whether they are; 1) suitable, 2) available and 3) achievable. Sites that meet this criteria will progress through the site selection methodology, testing the sites against assessment criteria including development constraints, strategic objectives and planning judgement.

10.3   The Call for Sites process is an opportunity for landowners and developers to formally submit their sites to the Council for consideration as a site allocation. The Call for Sites process has been extended until 8 January 2021 as a result of the changing economic landscape forced via the Covid-19 pandemic. The Council may consider sites submitted after the Call for Sites closure in circumstances where sites may be considered a strategic fit, as well as suitable when the wider site selection methodology is applied, as per any other site submissions. Sites may be submitted more than once, for example from different developers or on its own and also part of a larger site.

10.4   Sites allocated through the Local Plan are distinct from planning applications. A site allocation has been deemed by the Council to be the most appropriate use for a site, establishing the principle of development for a particular use and/or type of development, subject to consideration of technical matters through a planning application. Similarly, if an area of land is not allocated through the Local Plan this does not prevent a future planning application coming forward.

10.5   It is important the site selection process, in conjunction with accompanying Sustainability Appraisal adheres to the principles as laid out in the NPPF. Paragraph 67 of the NPPF states strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing (and/or employment) land availability assessment. From the SHELAA, the Council's planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

10.6   An evidence based approach is important when it comes to identifying the most appropriate sites for employment, housing, minerals, renewable energy projects and any other development uses to be allocated in the Local Plan. Sites will be subject to assessment of any constraints present, providing a view of suitable sites for development. Constraints include environmental or heritage designations which can impact on the level or type of development occurring. These constraints are split into two categories:

- **Hard constraints**, where sites will be deemed unsuitable for development if wholly or significantly within; and
- **Soft constraints**, where development would be possible with appropriate mitigation.

10.7   Where development on submitted sites is clearly not achievable due to the presence of hard constraints, they will be filtered out at an early stage (stage 2) of the site selection process. The totality of soft constraints present on the site will be considered and total site areas will be reduced to exclude highly constrained areas of the site, or whether adverse impacts can be partially or substantially mitigated. Examples of mitigation measures include the use of sustainable urban drainage systems and landscape design to minimise and manage flood risk, enhancing heritage assets, tackling heritage at risk and enhancing nearby or providing new public open space where an existing open space may be impacted by development.

10.8   Planning judgement will be applied to candidate sites that have a significant area of coverage by a hard constraint, but not wholly covered. For example, the land coverage or presence of the hard constraint negates the feasibility of site access, or the remaining developable area would result in a number of homes lower than the small sites threshold of 5+.

Constraints

Legend:

- Green Network
- Site of Special Scientific Interest
- Ancient Woodland
- Proposed LNR
- Local Wildlife Sites
- Local Geological Sites
- AONB
- Strategic Landscapes
- Historic Parks and Gardens
- Conservation Area
- Flood zone 2
- Flood zone 3
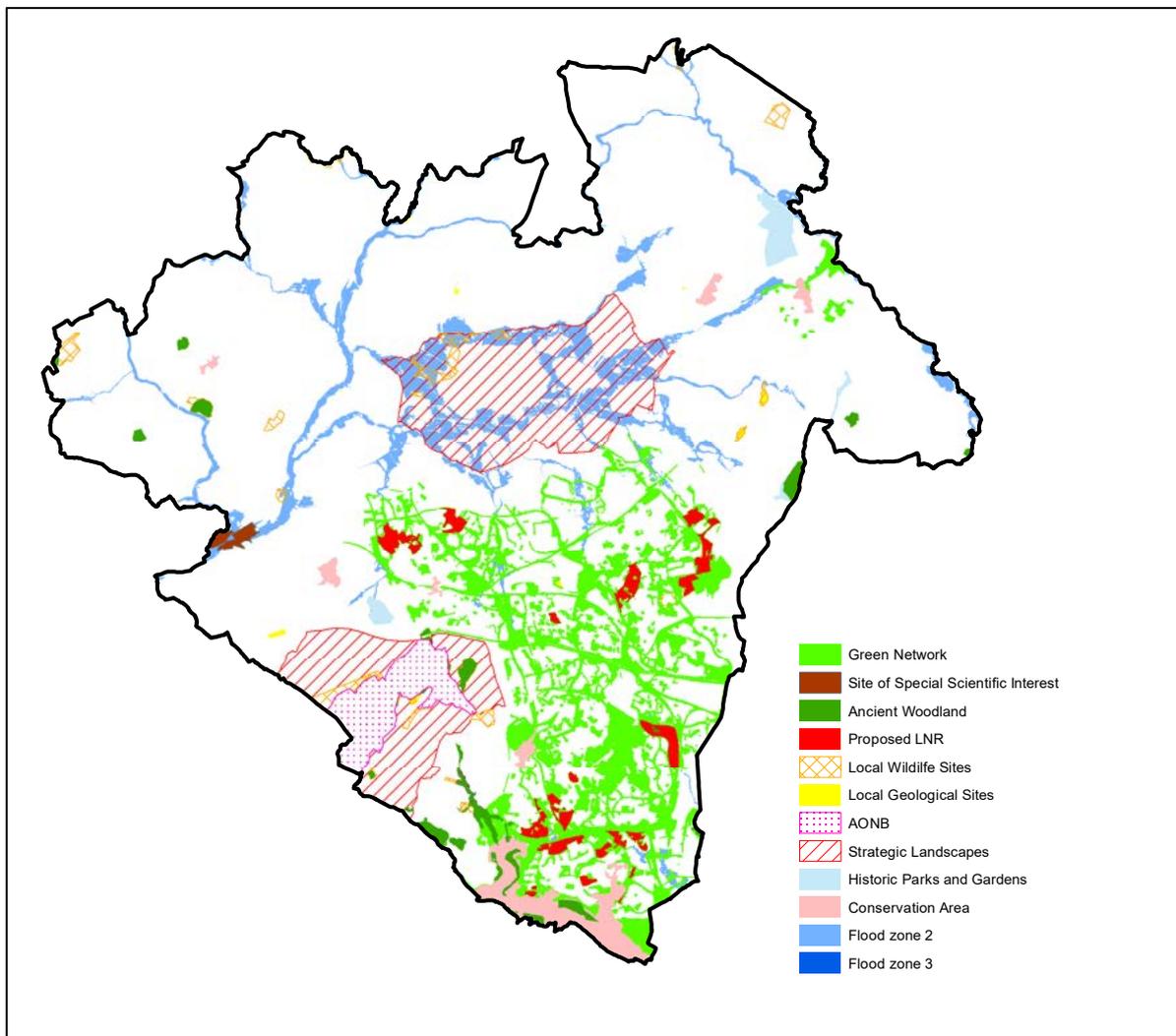
Selecting employment sites

10.9   A key driver for the review is to maintain a supply of employment land. When allocating employment sites, it is important to differentiate how a site might be more suitable for employment than for housing. Additional evidence through the Economic & Housing Development Needs Assessment (EHDNA) will incorporate local market analysis and information on key growth sectors of the economy, the study will translate this information into broad land use requirements. Factors that will help determine whether a site is suitable for employment include:

- Site-specific characteristics such as topography and shape.
- Highways access.
- Proximity to other similar employment uses.
- Strategic location of the site within the context of the overall preferred development strategy.
- Any existing policy designations such as Strategic Employment Areas or Town Centres (subject to the Local Plan Review).

10.10   The Council also recognise that some submissions for other uses, such as housing, may make a more suitable contribution to the borough's employment land requirements. Where this is identified the Council will work with developers to justify proposals on the basis of delivering new employment land.

Proposed site selection methodology

10.11   At this stage, the Council is proposing the following site selection methodology. This consists of 7 stages:

Stage 1 - Call for Sites and Strategic Housing & Economic Land Availability Assessment (SHELAA)

10.12   Identification of potential sites through both processes.

a.   Firstly, from the Call for Sites, sites submitted from landowners & developers go forward for consideration. Some sites may progress to planning permissions through the evolution of the plan preparation so site numbers and status will also evolve. Site submissions below 0.25 ha or capable of accommodating only 5 or fewer dwellings are unlikely to be considered for inclusion in the local plan, unless there is potential for allocation as part of a larger site. Such small sites can still be considered through the planning application process as 'windfall development'.
b.   From the SHELAA, all sites go forward for consideration. The SHELAA is a survey of both existing and potential development sites, identifying the supply that is available to meet requirements but does not allocate sites.

Stage 2 – Initial Assessment of Hard Constraints

10.13   Identify sites considered unsuitable due to site being wholly or significantly within hard constraints, i.e. where development on the remaining developable area would not be considered justifiable. Sites do not progress further. Hard constraints identified within the borough include:

- Sites of Special Scientific Interest (SSSI).
- Local Nature Reserves (LNR).

- Historic Parks & Gardens.
- Ancient Woodland/Ancient Trees.
- Grade I or II Listed Buildings.
- Scheduled Monuments.
- Flood Zone 3.
- Areas of Outstanding Natural Beauty.
- Local Sites (Wildlife or Geological).

Stage 3 – Preferred growth strategy and development principles

10.14   Sites will be screened against the preferred Local Plan growth strategy. Housing and employment sites would not progress if they clearly do not fit with the preferred development strategy, minerals and possible other submitted typologies will be subject to a different process. The Council is consulting on growth strategy options as part of the Issues & Options consultation document. The preferred growth strategy and draft site allocations will be published for consultation at the Preferred Options stage of this review.

10.15   As part of the site selection methodology the Council is also proposing a set of principles which will help direct development following the distribution of the preferred levels of growth between Telford, Newport and the rural area. These principles will contribute towards determining the most suitable locations for proposed site allocations as part of the site selection process. The principles are covered by two broad themes:

1.   Corridors & Networks

The corridors and networks principles will help ensure new development is interconnected, provide access to jobs and services as well as opportunities to readily access green space and the natural environment. The principles seek to achieve sites that:

1.   Are adjacent to or could be connected to the strategic and principal highway network identified on the TWLP policies map.
2.   Can be connected to bus routes or provide the opportunity to grow the existing bus network.
3.   Sites that can deliver new commercial or residential development opportunities around railway stations (including the potential for rail connections along the route from Stafford Park to Ironbridge Power Station via the south of Telford).
4.   Are connected or could be connected to the strategic walking, cycling and Public Rights of Way network.
5.   Are well connected to existing green infrastructure and green spaces.
6.   Provide the opportunity increase the coverage of better connected green infrastructure and publicly accessible open space for the movement of people, biodiversity and species.
7.   Sites of a scale that can help deliver new networks including electric vehicle infrastructure, renewable energy generation and 5G communications infrastructure.

2.   Centres & Regeneration

The centres and regeneration principles will help to ensure that development plays a positive contribution towards supporting regeneration, renewal and repurposing of town, market and district centres as well as former new town housing estates. The principles seek to achieve sites that:

1. Would realise development opportunities in and around existing town, market and district centres that would support the regeneration of those centres.
2. Would form Sustainable Urban Extensions that would be of sufficient scale to deliver new district or local centres.
3. Will bring in new uses and trade to town, market and district centres including the potential for some residential development.
4. Would realise development opportunities (new build and re-provision) in and around existing new town housing estates that could improve local housing stock, enhance the public realm and create greater housing choice in those areas.
5. Deliver development on brownfield land that has low ecological value.
6. Would create stronger communities and benefit existing communities through the regeneration of a range of development sites that would deliver opportunities for support and specialist accommodation as well as employment opportunities.

Stage 4 – Integrated Assessment

10.16 Sites progressing to this stage will be appraised against Sustainability Appraisal objectives. Significant positive or negative effects, as well as cumulative effects will be identified and scored via a RAG rating system. This stage would identify appropriate mitigation measures that would need to be addressed if a site is subsequently progressed to the next stage.

Stage 5 – Flood Risk Sequential & Exceptions Test

10.17 Sites ranked from low to high on flood risk (sites identified as flood zone 3b will have been ruled out at Stage 2). Rankings are based on findings from the Strategic Flood Risk Assessment (SFRA). More vulnerable sites (medium to high risk) requires pass of both parts of the Exception Test and site specific Flood Risk Assessment as set out in the NPPF.

Stage 6 – Technical Assessment Stage

10.18 Sites will be assessed in detail with regards to soft constraints and the level of mitigation required.

10.19 Soft constraints include but are not exclusive to:

- Tree Preservation Orders (TPOs).
- Public Open Space.
- Mineral Safeguarding Areas.
- Conservation Areas.
- World Heritage Site.
- Locally Listed Buildings.
- Other non-designated heritage assets.
- Flood Zone 2.
- Strategic Landscapes.
- Green Network.

10.20 Sites will be assessed against the following evidence base:

- Landscape and visual sensitivity study.
- Ecology and biodiversity evidence.

- Heritage evidence – proximity to heritage assets & officer assessment of impacts and setting.
- Infrastructure delivery planning.
- Service provision – e.g. schools, healthcare.
- Site access achievability during plan period – based on evidence provided by site promoters.
- Traffic modelling.

Stage 7 – Overall Conclusions & Decisions on Site Allocations & Rejections

10.21 Sites at this stage of the process will either be justified as final site allocations, or rejected with clear reasoning for that decision. The Council may revisit sites from previous stages of the methodology if insufficient sites have been identified to meet requirements.

10.22 Late submissions put forward after the Call for Sites closure may be considered by the Council with the expectation that strong evidence supports the submission. Submitted sites may be withdrawn from the process via request. Boundary amendments of existing submissions are also possible.

Question 56

Do you have any comments on the proposed site selection methodology?

Question 57

Do you think the presence of certain soft constraints should be treated more importantly than others? I.e. should these factors have greater weighting in the assessment process? If yes, please provide details.

Question 58

Do you agree the methodology covers the key considerations for selecting or rejecting development sites?

Question 59

Should sites only be taken forward for consideration where they are large enough to ask developers to provide Affordable Housing on site? (10 or more dwellings?)

Question 60

Do you have any comments on the development principles which will help direct development following the distribution of the preferred growth levels?

Question 61

In addition to the factors mentioned in the methodology above, are there other material planning considerations you consider to be important when selecting sites? Please provide details.