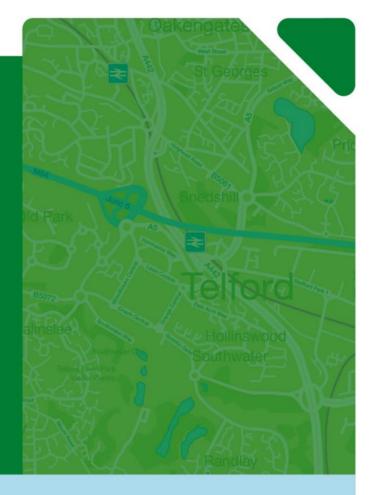


Protect, care and invest to create a better borough

# Telford and Wrekin Local Plan Review

# **Submission Document**

Regulation 22 Consultation Statement



2020 - 2040



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#### 1 Introduction

#### **Purpose**

- 1.1 This Statement of Consultation sets out how the Council has involved residents and key stakeholders in preparing the Telford and Wrekin Local Plan review (TWLPR) in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant regulations and the adopted Statement of Community Involvement (SCI). The SCI sets out how the Council will engage with local communities and stakeholders in its plan preparation. The SCI sets out the methods of engagement and the organisations, stakeholders and statutory bodies to be consulted in preparing a plan. The consultations referred to above to have been carried out in accordance with the SCI.
- **1.3** The Council has prepared a separate Duty to Cooperate Statement of Compliance.
- **1.4** In line with Regulation 22 (1)(c) the Statement of Consultation sets out:
- i. Which organisations, stakeholders, and persons the local planning authority invited to make representations under Regulation 18
- ii. How they were invited to make their representations
- iii. A summary of the main issues raised
- iv. How those issues have been taken into account
- v. If representations were made pursuant to Regulation 20, the number made and a summary of the key issues
- **1.5** In line with Regulation 22 (1)(d), copies of any representations made in accordance with regulation 20 can be found on the Local Plan Examination webpage at <a href="https://www.telfordandwrekinlocalplan.co.uk">www.telfordandwrekinlocalplan.co.uk</a> under document reference CD11.

### 2 Background

- **2.1** This consultation statement describes how the Council has undertaken community participation and stakeholder involvement in the production of its Local Plan. It explains the different stages of plan preparation that Telford & Wrekin Council has undertaken, the main issues raised, and how representations have informed the plan preparation.
- **2.2** A separate document has previously been produced at the Telford and Wrekin Local Plan review (Regulation 18), draft plan consultation stage including the Council's response to previous consultation stages that informed the plan preparation. This is available in the examination library.
- **2.3** Preparation of the TWLPR commenced in January 2020. The Council has carried out three rounds of consultation to date which is set out below:



**2.4** This Consultation Statement also highlights how the Council has met the requirements of the Statement of Community Involvement (SCI), the latest version of which was adopted in January 2025.

# 3 Relationship to Telford & Wrekin Council Statement of Community Involvement (SCI)

- **3.1** The Council has an adopted Statement of Community Involvement, or SCI, which sets out how we aim to engage with local communities and stakeholders in plan preparation as well as when determining planning applications. The SCI contains a list of the types of organisations, individuals and statutory bodies that are consulted in preparing a plan. The Publication Version (Regulation 19) consultation was carried out in accordance with the adopted SCI.
- 3.2 The latest version of the Council's Statement of Community Involvement (SCI) was adopted in January 2025. It outlines who should be consulted at each stage of the Local Plan's production and the types of methods that will be used for effective involvement. In addition to the outreach methods set out in the SCI, the Council also has a "Duty to Cooperate" to work with a number of public agencies and service providers in the plan making process. These bodies are set out in the Localism Act 2011.

### **4 Consultation Involvement and Engagement**

- **4.1** This chapter sets out the main consultation/community engagement events that have taken place during Local Plan consultation.
- **4.2** Following adoption of the Statement of Community Involvement in January 2020, Telford & Wrekin Council began its first consultation on the Local Plan review, Issues and Options, over the period of October 2020 to January 2021.
- **4.3** The Issues and Options stage of plan making was carried out during the pandemic restrictions during 2020/21. As a result of this the Council adapted its consultation planning accordingly to ensure that the consultation received wide coverage and residents and stakeholder were aware of how they could comment.
- **4.4** To raise awareness of the Local Plan the following communications methods were used; emails, letters, hard copy and online response forms, an online consultation portal, Council notice boards/screens/information stands, non-Council notice boards across Telford & Wrekin Town and Parish Councils, press releases, Council webpages, LinkedIn, Nextdoor, Facebook, X (formally known as Twitter), public meetings across the borough and focus groups

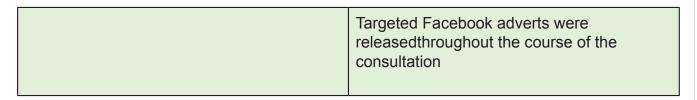
#### 4.1 Regulation 18 consultation process and engagement

**4.5** The draft Telford and Wrekin Local Plan review (Regulation 18) consultation took place from 25 October 2023 to 31 January 2024. The Council is committed to involving local communities and stakeholders in the preparation of the Local Plan and sees consultation as an ongoing activity, which feeds the views of residents and stakeholders into the plan process.

Table 1 - Communication channels used for Regulation 18 (Draft Plan) consultation

| Channels used               |  |  |
|-----------------------------|--|--|
| Emails and letters          | Email & Letters to all consultees registered on the Local Plan database including specific consultees, general consultees and residents who have previously expressed an interest in the Local Plan.  Free post envelopes in all areas where a draft plan document was available to enable residents to submit comments via post |  |
| Leaflets and questionnaires | Frequently asked questions document available on the Local Plan website  Publicity poster for public buildings  Information hand out sheets containing contact details including post address, email address, phone number and website details   |  |

| Online questionnaire on the council's consultation portal | All respondents were directed initially to the consultation portal   |
|---|--|
| Council Notice board/screens/ information stands          | The consultation was publicised in public facing buildings (libraries and community centres)   |
| Non council notice boards/ screens/ information stands    | Town and Parish Councils advertised events via their own communication channels including local notice boards, social media and newsletters  The Council provided Town and Parish Councils with materials such as poster template upon request   |
| Press releases  | The consultation was published in the Shropshire Star, and via the Council's community newsletter.  A new database was created via GovDelivery, utilised to send out newsletters to those wishing to receive updates on the Local Plan. At the end of the consultation, there were over 1,100 people signed up to the mailing list  4 Radio interviews took place with Telford & Wrekin Council's Cabinet Member with responsibility for Planning. |
| Council Website page                                      | The consultation was available via a dedicated microsite for the Local Plan Review – www.telfordandwrekinlocalplan.co.uk  The consultation could also be accessed via the planning policy page on the Council's main website www.telford.gov.uk/planningpolicy   |
| Social media  | Information was shared via the following platforms throughout the course of the consultation:  Facebook (Telford & Wrekin Council), X (Twitter - @TelfordWrekin), LinkedIn (Telford & Wrekin Council), Nextdoor (add handle)   |



- **4.6** Face to face drop in sessions An extensive engagement process resulted in 13 Town & Parish Council events, five Council organised drop-in sessions and requests for meetings from residents groups. Attendance at these events was generally good, with the strongest attendance at three particular events; Rodington, Edgmond and Muxton. All events were publicised on the Local Plan website (<a href="www.telfordandwrekinlocalplan.co.uk">www.telfordandwrekinlocalplan.co.uk</a>). In total officers engaged with over 900 members of the public at these sessions. Over and above this face to face outreach, the Strategic Planning team were also available on the telephone between 8:30am 5pm during weekdays or face to face on request.
- **4.7 Social media** During the consultation period, the Communication team within Telford and Wrekin put in place a number of media interviews, press releases and posts on social media such as Facebook, LinkedIn, Nextdoor and X (formally known as Twitter). In addition, a dedicated newsletter for Local Plan updates was also created, which by the end of the consultation had over 1,100 subscribers. Updates were also sent out via the Leader of Telford & Wrekin Council's e-shot over the course of the consultation period which had over 16,000 subscribers at the time, as well as via the community newsletter which reached an additional 1,400 interested parties.
- 4.8 Local Plan website A dedicated consultation microsite was created to enable the public consultation to be as open as possible, allowing residents and other interested parties to engage with the consultation in several ways, including via the Objective system, e-mail or in writing to the address supplied. Within the website, copies of the draft plan and accompanying maps were available to view as well as an interactive policy map, evidence base documents, specific information on each section of the draft plan and direct access through to the online consultation portal. For those not wishing to submit comments online, there was information available on all methods of making comments that could be accepted. Youtube videos were also produced for the purpose of explaining the Local Plan and its importance, as well as explaining how to use the consultation portal.
- **4.9 Hard copies** The draft plan and its accompanying maps were made available in 12 public buildings (libraries, council offices and community centres) across the borough. Additional copies of the draft plan were made available to Parish Councils when requested, including an additional copy for Donnington Library due to demand from the community. This also included providing these locations with copies of response forms for those unable to access the online portal.
- **4.10** 2,762 individuals and organisations made representations to the Local Plan during the Regulation 18 consultation period. Where consultees made comments on more than one section of the Local Plan, these have been recorded separately, thus the Council has recorded 3,625 individual comments.
- **4.11** Further detail of the Regulation 18 consultation, including the summary of responses received and how the Council responded can be found within the Regulation 18 Consultation Statement that the Council published in March 2025.

#### 4.2 Regulation 19 exhibition process and engagement

- **4.12** The Council adopted an updated SCI in January 2025 and following this the Regulation 19 exhibition took place between 17 March 2025 and 4pm on 5 May 2025, a period of seven weeks in excess of the statutory six week period.
- **4.13** Drawing on its own database of groups who have expressed an interest in the evolving Local Plan in the past and its obligation to identify specific and general consultation bodies, the Council notified over 250 organisations including public bodies, parish and town councils within the borough and in adjoining local authority areas statutory undertakers and a range of social and environmental groups, industry and trade bodies in addition to local residents. A list of bodies consulted can be seen in Appendix A. 589 also received a direct notification via letter. A copy of the statutory legal notice associated with this consultation can be seen at Appendix B. Relevant representation forms used for the submission of online or paper representations are shown at Appendix C.
- **4.14** Having regard to its obligations under its SCI, the Council used the following methods of engagement:

Table 2 – Communications channels used for Regulation 19 (Publication Version) exhibition

| Channels used               |  |  |
|-----------------------------|--|--|
| Emails and letters          | Email & Letters to all consultees registered on the Local Plan database including specific consultees, general consultees and email & letters for residents who have previously expressed an interest in the Local Plan.   |  |
| Leaflets and questionnaires | Frequently asked questions document available on the Local Plan website  Publicity posters for public buildings (libraries and community centres/hubs)  Library staff at the borough's two main libraries (Southwater and Wellington) were able to facilitate the printing of response forms for members of the public on request  Response forms, copies of the plan and policies maps were made available in hard copy form in the boroughs libraries and community centres/hubs. All documents were also made available electronically via www.telfordandwrekinlocalplan.co.uk. |  |

| Online questionnaire on the Council's consultation portal | All respondents, including residents, were directed initially to the consultation portal and all publicity included a link to the portal the <a href="https://www.telfordandwrekinlocalplan.co.uk">www.telfordandwrekinlocalplan.co.uk</a> landing page.  |
|---|---|
| Council notice board/screens/information stands           | The consultation was publicised in public facing buildings (libraries and community centres) across the Borough.  |
| Non-Council notice boards/screens/information stands      | Notices were sent to community run libraries and hubs across the Borough.  Parish Councils were also contacted regarding the consultation and some requested copies of posters which the Council sent for the PC's to display.  |
| Press releases  | 3 press releases were published over the course of the consultation.  The consultation was publicised ( <b>Appendix B</b> ) in the Shropshire Star, and via the Council's community newsletter.  The database via GovDelivery was utilised to send out newsletters to those wishing to receive updates on the Local Plan. At the end of the consultation, there were over 1,400 people signed up to the mailing list. |
| Council website   | Details of the consultation was made available via <a href="https://www.telfordandwrekinlocalplan.co.uk">www.telfordandwrekinlocalplan.co.uk</a> .  The consultation could also be found via the planning policy section on the Council's main website <a href="https://www.telford.gov.uk/planningpolicy">www.telford.gov.uk/planningpolicy</a> .  |
| Social media  | The consultation was publicised via the Council's corporate Facebook (Telford & Wrekin Council), X (Twitter - @TelfordWrekin), LinkedIn (Telford & Wrekin Council), Nextdoor.   |

**4.15** In addition to the above, officers were available throughout the consultation to respond to queries raised via phone, email or face to face on request.

- **4.16** During the consultation period, the Communication team within Telford and Wrekin put in place a number of media interviews, press releases and posts on social media such as Facebook, LinkedIn, Nextdoor and X (formally known as Twitter). The details of the communications are detailed below.
- **4.17** Within the Appendix there is also an example of the poster used for public buildings (**F**) and a Press Release (**D**). In addition, there is also a schedule of when information was sent out via press release and newsletter (**E**).

#### **Dedicated consultation website**

- **4.18** A dedicated consultation section of the microsite was created to enable the publication consultation to be as open and direct as possible, allowing residents and other interested parties to engage with the consultation in several ways, including via the Objective system, e-mail or in writing to the address supplied. Within the website, copies of the publication plan and accompanying maps were available to view as well as an interactive policy map, evidence base documents and direct access through to the online consultation portal. For those not wishing to submit comments online, there was information available on all methods of making comments that could be accepted.
- www.telfordandwrekinlocalplan.co.uk

#### Social media

#### Platforms: Facebook, X (Twitter), LinkedIn and Nextdoor

- 21 posts (6 Facebook, 7 LinkedIn, 7 Nextdoor)
- 97.3K reach (The number of time posts have been seen by different people)
- 103K impressions (The total number of time the posts have been show on a person's screen)
- 1.4K clicks through to the website

Please note this data does not include X (Twitter) as this platform does not record stats effectively. This data also does not include the reach or impressions of the sharing of posts across hyperlocal groups / channels or those posted by third parties including the media.

#### **Newsletter updates (Gov Delivery E-marketing)**

**4.19** At the end of the consultation, there were 1,486 subscribers to the topic 'Telford and Wrekin Local Plan'. The following statistics show when e-marketing has been published, the number of subscribers at the time of publishing and open rate.

| Date sent  | Number of subscribers | Open rate (unique open rate) |
|------------|-----------------------|------------------------------|
| 5/02/2025  | 1,303                 | 73%                          |
| 17/03/2025 | 1,355                 | 75%                          |
| 24/03/2025 | 1,409                 | 73%                          |

| 01/04/2025 | 1,431 | 66% |
|------------|-------|-----|
| 01/04/2025 | 1,430 | 67% |
| 14/04/2025 | 1,449 | 62% |
| 22/04/2025 | 1,467 | 65% |
| 28/04/2025 | 1,486 | 65% |

#### Printed materials at Telford and Wrekin locations

- **4.20** There were hard copies of the draft plan and accompanying policies maps available at the following locations across the borough:
- Dawley and Malinslee Community Library Dawley House, 22 Burton Street, Dawley, TF4 2ES
- Madeley Library and First Point The Anstice, Park Avenue, Madeley, Telford, TF7 5BB
- Wellington Library Wellington Civic and Leisure Centre, Larkin Way, Wellington, Telford, TF1 1I X
- Southwater Library Southwater Square, Southwater Way, Telford, TF3 4JG
- Stirchley Community Library The Sambrook Centre, Stirchley, Telford, TF3 1FA
- Newport Library 53 55 High Street, Newport, TF10 7AT
- Oakengates Library the Wakes, Theatre Square, Oakengates, TF2 6EP
- Brookside Central (formerly Brookside Community Centre) Burford, Brookside, Telford, TF3 1LP
- Donnington Community Hub St Matthews Road, Donnington, Telford, TF2 7RB
- Hub on the Hill (formerly Sutton Hill Community Centre) 104-106 Southgate, Sutton Hill,
   Telford TF7 4HG
- Leegomery Community Centre Leegate Avenue, Leegomery, Telford, TF1 6NA
- Park Lane Centre Park Lane, Woodside, Telford, TF7 5QZ
- St. Johns Church Community Building St John's Church, Saltwells Drive, Muxton, Telford, TF2 8RJ
- Donnington and Muxton Community Library, Turreff Avenue, Donnington, Telford, TF2 8HG.
- Hadley Library, Hadley Learning Community, Crescent Road, Hadley, Telford, TF1 5NU.
- **4.21** An additional copy of the publication plan was made available to Parish Councils when requested, including an additional copy for Donnington Library following their feedback at Regulation 18.

#### **Community newsletter**

**4.22** The Publication Version of the Local Plan was featured in the Community News three times throughout the consultation period. The aim of the newsletter is to publish community-based news and information about Council services. The below stats outline the number of people that were signed up to receiving the newsletter at the time of each publication with reference to the draft Local Plan, and the unique opens that this generated.

| Date               | Deliveries        | Open rate                                |
|--------------------|-------------------|--|
| 17th February 2025 | 4,557 subscribers | 42%.                                     |
|                    |                   | 8 clicks through to Local Plan website   |
| 28th March 2025    | 4,567 subscribers | 42%.                                     |
|                    |                   | 42 clicks through to Local Plan website. |
| 25th April 2025    | 4,578 subscribers | 40% open rate.                           |
|                    |                   | 35 Clicks through to Local Plan website. |

#### Leader of Telford & Wrekin Council e-shots

There are over 17,000 subscribers to the Leader's weekly news email. The following 4.23 stats show when e-marketing has been published, the number of subscribers at the time of publishing, open rate and number of clicks to the item 'Local Plan'.

| Date              | Number of subscribers | Website clicks  |
|-------------------|-----------------------|---|
| 7th February 2025 | 17,343                | Open rate 40%.  262 clicks through to the Local Plan website. |
| 21st March 2025   | 17,278                | Open rate 39%.  334 clicks through to the Local Plan website. |

#### Youtube video

**4.24** A Youtube video was created in order to help the community understand the purpose of the Local Plan, how it positively impacts their day to day lives and how to engage in the process.

| Title                                     | Hyperlink   | Views |
|---|---|-------|
| What is the Telford and Wrekin Local Plan | Youtube - Telford and Wrekin<br>- What is the Telford and<br>Wrekin Local Plan? | 597   |

### **5 Summary of Main Issues**

- 5.1 365 individuals and organisations made representations to the Local Plan during the Publication Version of the plan being available for public comment. All comments have been uploaded onto the Council's dedicated Local Plan website (<a href="www.telfordandwrekinlocalplan.co.uk">www.telfordandwrekinlocalplan.co.uk</a>). Where consultees made commented on more than one section of the Local Plan, these have been recorded separately and thus the Council has recorded 1,077 individual comments. Appendix G records the number of comments made against each section or policy within the Local Plan. Comments were generally recorded as being in support of a policy or objecting to it. Some consultee's comments were recorded as general comments where it neither supported nor objected to a policy, or where it was unclear how the representation should be recorded. All representations received have been sent to the Inspector who will examine this Local Plan a database setting out where individuals or organisations have commented is also publically available on the Councils dedicated Local Plan website (as above).
- **5.2** An analysis of the main issues raised by the representations received on a section by section basis is summarised below to help the local community and Inspector have an overview of the issues raised.

#### **Plan Policy Considerations**

**5.3** Representations were received from public bodies and statutory undertakers including Duty to Cooperate bodies, parish councils, residents, developers and their agents. The main issues arising from comments both in support and opposition to the Local Plan are summarised below on a section by section basis.

#### **Foreword**

5.4 No comments were received on this section of the Plan

#### Introduction

**5.5** No comments were received on this section of the Plan

#### Vision, Priorities and Profile

**5.6** The Council received 17 total responses in connection with the six priorities laid out across the chapter. The Vision, Priorities and Profile section of the plan was generally supported by residents and developers. Multiple responses did however request more detail into certain aspects of the vision as well as a higher level of focus into two specific areas, housing and climate change. Participants also requested the plan period be extended to 2041 in order to ensure the plan covered a full 15 years following adoption.

#### **Development Strategy and Strategic Policies**

**5.7** The Council received 53 total representations relating to the 7 Strategic Policies, 137 separate comments have been recorded within the regulation 19 response database for this chapter of the plan. Within the chapter Strategic Policy S4 (Housing Delivery Strategy) received the greatest number of representations closely followed by policy S7 (Developer Contributions and Infrastructure Delivery). Many of the responses to this chapter were positive about the councils ambitious housing, economic and environmental goals. The key areas that consultees

focused on were the councils housing strategy as well as developer contributions and the inclusion of a viability review mechanism in the policy and continuity with other sections of the plan. Further detail is included in relation to each policy below.

- 5.8 S1 Protecting and Enhancing the Boroughs Green Spaces: S1 enjoyed support from both developers and statutory consultees for the way in which the policy seeks to protect and enhance green spaces in the borough. Respondents did however request a distinction be made within the policy between commercial and non-commercial woodlands and that a definition of 'forest communities' be provided. Some consultees also felt that while the policy was positive. enhancing the boroughs green space required more detail than a single policy could give and may be better addressed across other sections elsewhere in the plan.
- 5.9 S2 Nature Conservation: Most consultees for this policy supported the premise and general goal, agreeing that developments can and should protect, maintain and enhance biodiversity and geodiversity. It was requested that further clarity be provided on if or how the policy relates to Biodiversity Net Gain (BNG), if so this should be specifically referenced, further comments also requested that the hierarchy of location only apply 'where possible and viable'. A few consultees also considered that section 7 (Green and Natural Environment) did enough to cover the enhancement of the boroughs green spaces others suggesting that combining policies S1 and S2 may be helpful in order to streamline the chapter for developers.
- S3 Economic Delivery Strategy: Many responses to this policy expressed a general level of support and commended the Council for being ambitious and planning to provide more than the minimum required targets. Neighbouring Authorities encouraged the council to commit to an early review mechanism post adoption which would allow for further collaboration and increase flexibility in addressing the changing development needs of the Black Country. It was requested by multiple consultees that the 2023 Economic Housing Development Need Assessment be released (This document was superseded by the Housing Requirement Technical Paper (October 2023) and the Housing Mix and Affordable Housing Needs (October 2023) in line with updated census data).
- S4 Housing Delivery Strategy: Of the seven policies within this chapter S4 received the most comments (33). While many of these responses noted that the council is completely addressing their required housing targets some felt there was still additional scope for more homes to be delivered or requested that the figures in the plan were considered a minimum requirement to provide flexibility. Neighbouring Authorities were supportive of the housing targets and recognised the positive contribution to the unmet housing needs of the following Black Country Local Planning Authorities (LPAs) of; City of Wolverhampton Council, Sandwell Metropolitan Borough Council, Dudley Metropolitan Borough Council and Walsall Metropolitan Borough Council. They also suggested that referencing the total contribution to the Black Country LPAs across the plan period in policy would be a useful clarification.
- S5 Mitigating and Adapting to Climate Change: The majority of responses to policy S5 including the representation from Natural England were supportive of the councils commitment to ensuring green developments are bought forward within the borough. Consultees were also mostly supportive of the councils approach to tackling the climate emergency. Some were concerned the policy may be a little too rigid and asked for a loosing of the wording to better account for the impact that higher standards could have on viability. Requests were also made for clarity on what a Sustainability Statement should include and the meaning of supporting paragraph 4.44.

- **5.13 S6 Healthy Stronger Communities:** As with policy S5, policy S6 was supported by the majority of consultees who commented on it. Consultees recognised the importance of developments which improve their surroundings and facilitate the growth of healthy sustainable communities. Some responses expressed concern that aspects of the policy may not be relevant or feasible for all developments and asked that flexibility be added to the policy allowing the council to keep their high standards without overly hindering development. More clarification was also requested on what is meant by 'healthy design principles'.
- **5.14 S7 Developer Contributions and Infrastructure Delivery:**Policy S7 received the second most responses within this chapter totalling 23 individual comments. Feedback for this policy acknowledged the need for developer contributions to infrastructure and noted relevant national policy documents which apply to the collection of developer contributions. It was raised by developers that clawback mechanisms can be complicated and consultees requested more detail around how this will be implemented and why the council deemed in necessary. There was also a shared sentiment amongst some consultees that more detail of how and when infrastructure will be delivered as well as the extent of this infrastructure would strengthen the policy. This included commentary around the need for trigger points in the delivery of infrastructure.

#### **Development Management Policies**

**5.15** Main issues raised by respondents in relation to development management policies are set out below in chapter order.

#### **Climate Change**

- **5.16** The Council received 33 responses in connection with the six policies laid out within the chapter equating to 70 individual comments.
- **5.17 CC1 Sustainable Construction and Carbon Reduction:** The responses to this policy highlight that while high standards are vital to combatting climate change in the borough, there are instances where full compliance is not possible or where a more bespoke approach may be required and asked that the council take a site by site approach to reflect this. Developers note that this policy might impact the viability of certain developments on more challenging sites due to increased design, material and labour costs.
- **5.18 CC2 Renewable Energy in Developments:** Amongst the feedback to this policy given by consultees there were no principle objections, however, some respondents suggested the policy could benefit from including more flexible language such as "where practicable and viable". The benefits of onsite renewables were noted by many, although, some felt the policy could do more to address situations where this may be restricted or not the best option for the delivery of a sustainable site.
- **5.19 CC3 Strategic Renewable Energy Development:** The responses strongly supported this policy, however, comments were made expressing that the council should go further and support even more renewable energy developments. These consultees requested the policy identify suitable areas for renewable and low carbon energy sources and support development in these areas unless there is exceptional reason not to.

- 5.20 CC4 Water Re-use, Conservation, Efficiency and Quality: Many responses to the policy expressed support for the councils approach to water within the borough. Some did request more evidence to justify the high standards that the council are seeking for developments. It was also pointed out that the Water Cycle Study has recommended water efficiency standards beyond those set out in Building Regulations.
- CC5 Flood Risk Management and Sustainable Drainage Systems: Generally responses to this policy were supportive, however an issue was raised with the wording of CC5.1b regarding the phrase 'now or in the future'. A few consultees also requested further clarity on how new developments will mitigate flood risk in the surroundings of a site to prevent flood risk issues 'downstream'. Comment was also made regarding the need for further information in relation to updated national flood risk guidance to help determine drainage capacity in the borough.
- CC6 Managing Air Quality: A strong level of support was expressed by consultees for this policy. Some responses did suggest that the policy could be stronger in relation to ecological sites highlighting how construction and end user activity can contribute to sites exceeding their critical loads and requesting these be considered when deciding scale of growth .Comments also stated that a more thorough assessments of the impact of development on air quality should be required in order to decide the most appropriate mitigation techniques.

#### **Green and Natural Environment**

- 5.23 The Council received 57 responses on this section of the Local Plan.
- 5.24 **NE1 Biodiversity and Geodiversity:** Support for this policy was expressed within multiple responses. Certain terms in the policy such as 'Lawton Principles' need further clarification and justification. Developers also requested that part 2 of the policy confirm if in certain circumstances on-site mitigation could be provided.
- **NE2 Trees, Hedgerows and Woodlands:** Many consultees expressed support for the principles laid out in policy NE2. It should be clarified that some specific areas will not be encroached upon. A more pragmatic approach to removal of trees, hedgerows and woodlands may be necessary in exceptional circumstances. A more robust definition or an adjustment in terminology relating to veteran and mature trees could also help improve the policy.
- **NE3 Biodiversity Net Gain:** Amongst the seven policies within this chapter of the local plan NE3 received the most responses. Consultees felt that the policy was ambitious, however. concerns were raised in regards to the Biodiversity Net Gain standard within the plan, which aspires to exceed the minimum 10%, and many requested these standards be lowered to reflect national policy. Some consultees felt that higher standards could negatively impact viability and requested that the council provide further evidence to justify its aspirations to go deliver BNG above the national level.
- **NE4 Development Greening Factor:** The responses highlight the necessity of preserving rural character and biodiversity when considering development within the green network. Some responses question the council's evidence for requiring the Greening Factor while others request that the Greening Factor be encouraged rather than required or stated as a target rather than a minimum. Concern was also raised by some about how the greening factor may overlap with other requirements in the plan, for example clarification of whether BNG mitigation could be counted toward meeting the greening factor score for a site.

- **5.28 NE5 Green Network:** Consultees were broadly supportive of the green network as an important aspect of protecting local and accessible green space. Some developers requested slight alterations to the green network to exclude their sites, a request was also made to include Wappenshall Lane within the Green Network.
- **5.29 NE6 Shropshire Hills and Strategic Landscapes**: Responses to the policy acknowledged the Shropshire Hills AONB as a crucial part of the borough and the necessity of protecting it. Consultees agreed that any development within the AONB should be required to provide strong evidence that it will not be detrimental to the environment or character of the area.
- **5.30 NE7 Strategic Green Gaps:** The strategic green gaps laid out within the plan had support amongst consultees, however, some felt that additional green gaps could be beneficial to certain communities in the borough. A particular example was the request, made by the Parish Council, for a green gap at Eyton upon the Weald Moors in relation to the adjacent Sustainable Community site. This was to protect the village and rural character of the area. Respondents suggested that more evidence may also be required to justify the existence of the gaps referenced in the policy.

#### **Economy and Centres**

- **5.31** The Council received 23 responses on this section of the Local Plan.
- **5.32 EC1 Employment Development in the Urban Area and SEAs:** Respondents expressed support for economic growth in the area and supported the council taking positive steps to facilitate this. Some consultees noted that economic growth should not come at the expense of the town centres. A potential need to more strictly define the employment uses of the Strategic Employment Areas (SEAs) was also noted with some responses requesting use class E be explicitly supported and others requesting limiting change of use within use classes to prevent conversion of offices to retail outside of town centre boundaries.
- **5.33 EC2 Economic Development in the Urban Area**: This policy received two responses, one response noted a potential conflict between policy EC2 and SC2. A request was also made to reference class E uses within strategic employment areas to provide for additional flexibility.
- **5.34 EC3 Employment in the Rural Area:** Only a handful of consultees commented on policy EC3. The responses to this policy were mixed with some consultees asking for less restriction on employment sites in rural areas while others ask for explicit encouragement of certain types of employment development such as leisure and tourism.
- **5.35 EC4 Waste Management Facilities:** The council received a single response in relation to policy EC4 which outlined the necessity of buffer zones of 250m around waste management facilities to protect surrounding uses from, for example issues of odour.
- **5.36 EC5 Hierarchy of Centres:** Policy EC5 was generally supported by consultees. Some requested slight alterations to the policy wording to note key rural settlements, either within the category of local centres or as a separate category.

- **5.37 EC6 Telford Town Centre:** One consultee commented on this policy, the comment expressed support for certain areas of the policy and requested definitions of certain terms ("existing gateways" and "High-tech") be included. The consultee also proposed rewordings to encourage and exclude certain development within Telford Town Centre requesting use class E be explicitly mentioned.
- **5.38** *EC7 Market Towns and District Centres:* No consultees commented on policy EC7
- **5.39 EC8 Local Centres and Rural Services:** This policy received 2 responses, both in support.
- **5.40 EC9 Out of Centre and Edge of Centre Development:** Policy EC9 received 2 responses with both consultees asking for more clarity within the policy regarding floor space thresholds. One consultee requested that a 2,500m² threshold be adopted for food retail developments, the other requested clarity that the 500m² threshold within part 2a accounts for amalgamation, subdivision, creation of mezzanine floors and amendments to existing planning conditions.
- **5.41 EC10 Evening and Night Time Economy:** A single consultee commented on this policy, the response expressed support for the council's acknowledgement of potential issues that can arise around the evening and night time economy and noted the council is taking appropriate steps to mitigate this.
- **5.42 EC11 Shopfront and Advertisement Design:** This policy was commented on by 1 consultee. The comment expressed support for the policy and requested the policy note that solid exterior solid shutters are not acceptable.

#### Housing

- **5.43** The Council received 294 responses on this section of the Local Plan, this was the most responses of any policy section within the plan.
- **5.44 HO1 Housing Allocations:** The policy is broadly supported however there are calls to include and exclude various different sites across the borough site specific comments are covered below.
- Sustainable Communities: The responses provided comments on the proposed Sustainable Community (SC) sites in Telford, raising concerns about environmental impact, infrastructure provision, and housing affordability. Many consultees express concern that the existing infrastructure in these areas is not capable of accommodating such developments without appropriate mitigation. Responses were received around potential impacts on traffic, education facilities, drainage infrastructure and environmental impacts were expressed in multiple comments. Some felt the policy could do more to ensure that appropriate services for these developments be provided before or alongside construction to mitigate the effects on existing communities. Appropriate buffering was also requested around the SC's, including the need for a green gap separating Eyton upon the Weald Moors from the adjacent SC site. Other consultees stated the potential of the policy to address housing needs within the borough and felt that with appropriate constraints on plans, the developments could be delivered in a healthy sustainable way.
- SC1 Land at Bratton: This allocation received comments from 66 consultees. Responses
  highlighted concerns around access to the site and the potential impact on existing facilities
  in particular road and education infrastructure. Responses suggest that inadequate plans

to address these issues could negatively impact the local community's access to essential services, such as healthcare and education, while also harming wildlife habitats and biodiversity. Comments were received that road closures during development could increase congestion and could displace traffic to surrounding local roads as a result. Some responses did however see the potential of the sites and suggested ways in which it could be delivered sustainably and effectively including guaranteeing certain sites or small Local Nature Reserves as appropriate, defined green buffer zones separating new and existing homes and phasing development so key infrastructure is provided at appropriate trigger points. Respondents' requested further clarity on the contents of a development brief as well as the definition of forest community. Suggested changes were submitted in order to remove ambiguity from the policy, including reference to trigger points for infrastructure delivery, inclusion of an education infrastructure phasing plan and a commitment to a heritage impact assessment for the site.

- SC2 Land North East of Muxton: This allocation received comments from 104 consultees suggest that development in this area is excessive and a better approach may be to spread development across the borough. Responses also express concern that without proper provision of infrastructure the area will not be able to cope with such a development, highlighting the impact that could be placed on local infrastructure. Consultees focus in particular on the inability for the existing road network to accommodate the increased traffic flows that a development of this scale would bring as well as the lack of existing schools to accommodate for the potential new students. Multiple responses also request that vehicular access to the site, along Wellington Road, be removed from the site allocation including during and after construction to preserve the character of Muxton. Particular concern was raised regarding these access points which would be adjacent to two Duke of Sutherland cottages, impacting their character and integrity, these cottages are locally listed buildings. Concerns around the impact development could have on the local ecology and character of the area were also raised. During the regulation 19 consultation, the council also received one group response representing 1102 people in the form of a petition. The key points raised in the petition were a lack of communication with residents, concern was also raised around how development will affect the natural environment and how the existing infrastructure will cope with a large scale development in particular the road network. The response also highlighted the concern that the two Duke of Sutherland cottages above would be heavily impacted by proposed access arrangements to the site. A number of responses were positive about the deliverability of the site, noting that Muxton is well positioned to deliver new housing, a local centre, mobility hub, a primary school and centralised green and blue infrastructure including sports pitches. Clarity was requested regarding the content a development brief for the site and the term Forrest Community. Some proposed changes to the wording of the policy were submitted, these included a reference to provision of a secondary school within the allocated site SC3 and the additional requirement of an education infrastructure phasing plan and an infrastructure delivery plan for the site. It is also requested that the requirement to connect to the site to Silkin Way (National Cycle Route 45) be removed from SC2. One respondent also highlighted that a percentage of the site is brownfield in nature and asked that this be accounted for within the policy.
- **SC3 Land north of A442 Wheat Leasows (Wappenshall):** This allocation received comments from 49 consultees. The responses regarding proposed developments in the area were mixed. Many consultees stated their concern that the existing infrastructure if not properly improved will be insufficient to accommodate the development. As a result

requests were made to ensure that infrastructure and facilities to supplement the development be made either before or alongside development in order to limit impact on local road, schools and drainage systems. Specific reference was also made to the footpath network in the area and the need for this to be protected. Some respondents objected to building on productive agricultural land during a climate emergency. Some consultees expressed fears that the development may encroach on the Weald Moors, an important local ecosystem and encourage the council to commit to limiting any development past this allocation in the future and ensure any development is sympathetic to the local environment. Concerns were raised by the Strine Drainage board regarding flood risk within the area and the need to mitigate risk, address maintenance of infrastructure and improve capacity within the system. The potential benefits of development were recognised by respondents including the ability to 'slow the flow' and provide for aquifer recharge. A number of respondents expressed their support for this site allocation and confidence in the deliverability of a sustainable community as part of the allocation. Responses also highlighted a high level of access to the site and the potential this has to facilitate timely delivery. Slight alterations to the policy wording were also submitted, these included a reference to DD2 and the requirement to complete and agree a development brief with the Council prior to planning approval.

- 5.46 HO3 Housing Mix and Quality: Responses to this policy highlighted the council's commitment to providing high quality housing across the borough by mandating all developments meet Nationally Described Space Standards (NDSS). Some consultees questioned this standard and asked that the council provide additional evidence to justify it. Responses also required clarification on certain elements of the policy such as the proportion of houses on a major development required to meet section 5 of the policy as well as how section 3 would relate to flatted development. Consultees also noted that the policy as written may benefit from more flexible wording, requesting the inclusion of the phrase "unless otherwise agreed with local planning authority" within part 2 and 6 of the policy (NDSS and H4(2) / M4 (3) housing).
- **5.47 HO4 Affordable Housing Requirements:** The policy received support from multiple consultees, there was however some concern about the affordable housing requirements with some requesting that more evidence be provided to justify the 25% requirement in Telford built-up areas and the 35% in Newport and rural areas. Respondents noted that the Whole Plan Viability Assessment suggested lower %'s for affordable homes secured through section 106 agreements as opposed to a mix of s106 and Homes England grant.
- **5.48 HO5 Affordable Housing Delivery:** The policy received strong support within responses and although some felt that improvements could be made with regards to buffering around employment land requesting that employment and residential areas be separated and surrounded by a minimum of 30m planted woodland. Clarity with regards to offsite provisions of affordable housing was also requested.
- **5.49 HO6 Supported and Specialist Housing:** This policy got a small number of responses, the key points raised were around adding more reference to the benefit of extra care and assisted living facilities as well as comments stating the policy could benefit from more flexibility, for example the inclusion of guidance on where exceptions to the policy may be considered.
- **5.50 HO7 Houses in Multiple Occupation (HMO):** No consultees commented on this specific policy.

- **5.51** *HO8 Gypsy, Traveller and Showpeoples Accommodation:* This policy received 2 comments from consultees, while generally supportive responses highlighted recent updates to relevant national documents and encouraged the council to re-evaluate the capacity within the borough to demonstrate it could meet its needs in full.
- **5.52 HO9 Housing Development Regeneration:** This policy received 1 comment, the consultee asked reference be made to policy S6 as a reminder of the council's commitment to providing healthy sustainable communities.
- **5.53 HO10 Stalled Development Sites:** Responses to this policy highlighted the need to account for circumstances where lead-in times can be longer than 12 months and requested that the council adjust the policy accordingly.
- **5.54 HO11 Self-Build and Custom Housebuilding**: While consultees acknowledged the local need for self-build and custom housing plots there was a general feeling that the 5% requirement on sites of over 100 dwellings was too high or that better evidence was needed to justify it or a reduced % be sought in policy.
- **5.55 HO12 Housing Development in the Rural Area:** Consultees felt that this policy may be overly restrictive and may benefit from increased flexibility to better facilitate development within rural areas. Some also noted that the policy format could be altered for ease of reading.
- **5.56 HO13 Affordable Rural Exception Sites:** This policy received 2 comments from consultees, responses felt that as currently written the policy was too strict and that in certain circumstances exceptions to the policy could still benefit the local area. They also suggested amendments to improve flexibility by lowering the thresholds on local connection criteria and allowance of cross-subsidy or market homes on rural exception sites..

#### **Development Design**

- **5.57** The Council received 19 responses on this section of the Local Plan.
- **5.58 DD1 Design Criteria:** This policy was strongly supported by consultees although some did feel that the wording could be refined and that overlap with other areas of the plan should be removed. Others felt the policy should do more to specifically recommend features which should be incorporated or restricted such as limitations on slabbing or concreting gardens. A request was also made to make specific reference to development constraints which will apply to developments in close proximity to MOD sites of operation, in the case of Telford the base at MOD Donnington.
- **5.59 DD2 Housing Development Design:** Similarly to policy DD1, consultees expressed strong support for this policy. However, some felt that the policy could be condensed and combined with policy DD1 as well as removing overlap with other areas of the plan. Other consultees requested more clarity within the policy with regards to the structure and content of a Development Brief. Further comments were made requesting the policy reference specific design features such as bat and swift bricks.
- **5.60 DD3 Residential Alterations, Extensions and Annexes:** No comments were submitted in relation to this policy.

- 5.61 **DD4 Commercial and Industrial Design:** This policy received 3 comments from consultees, there was overall support for the policy with some minor inclusions requested such as explicit reference to orientation of buildings in order to facilitate rooftop solar power.
- 5.62 **DD5 Waste Planning for Residential Developments:** This policy received 2 comments from consultees both stating their support.
- DD6 Waste Planning for Commercial, Industrial and Retail Developments: No 5.63 comments were submitted in relation to this policy.

#### **Sustainable Travel and Transport Networks**

- 5.64 The Council received 47 responses on this section of the Local Plan.
- 5.65 ST1 Sustainable Travel: The policy was widely supported by consultees, some responses raised concerns that the policy was too broad and requested more flexibility on how and where it will apply to developments. Other consultees requested that the policy provide more clarity with how it plans to improve public transport within the borough.
- ST2 Safeguarding Rail and Transport Corridors: This policy received 2 comments from consultees both expressing support.
- 5.67 **ST3 Impact of Development on Highways:** Policy ST3 received the most comments within this section of the plan. While consultees supported aspects of the policy, some felt the policy would benefit from referencing specific measures to mitigate traffic, that are covered in the Infrastructure Delivery Plan. Requests were also made that the policy ensures that infrastructure is improved in advance of development commencing on certain sites.
- ST4 Design of Roads and Streets: Consultees expressed general support for this 5.68 policy, a request was made to loosen the policy stating that some aspects such as street trees were not always appropriate to incorporate within development. Further comments were made suggesting that reference to government standards set out in the Design Manual for Roads and Bridges and Manual for Streetsmay be better placed in supporting text.
- ST5 Electric Vehicle (EV) Infrastructure and Parking Design: There was strong support for this policy amongst consultees. Responses raised concern that certain aspects of the policy may be covered by building regulations, others requested the policy be clearer on what provisions will be required with regards to parking and charging infrastructure.

#### Community Infrastructure, Culture and Open Space

- 5.70 The Council received 13 responses on this section of the Local Plan.
- 5.71 Cl1 Community Facilities: Aspects of this policy were supported by consultees. Some responses requested further detail be added to the policy regarding the nature of facilities that will be sought such as indoor / outdoor recreation. Other consultees suggested minor modifications to the policy wording to improve effectiveness and clarity.
- Cl2 Existing Public Open Space: This policy received 2 comments from consultees 5.72 both expressing support.

- **5.73 CI3 Provision and Management of Public Open Spaces:** The responses to this policy were generally supportive, comments were made highlighting that there may be circumstances where on site landscaping is decided later in the application process and requested this be accounted for within the policy.
- **5.74 CI4 Leisure, Cultural and Tourism:** Consultees expressed support for this policy but requested slight alterations within the wording to facilitate ancillary development and resident lead developments.
- **5.75 CI5 Enhancing Communication Networks:** No comments were made regarding this policy.

#### **Historic Environment**

- **5.76** The Council received 8 responses on this section of the Local Plan.
- **5.77 HE1 Heritage Assets**: This policy was welcomed by consultees and responses were generally supportive. Some felt that stronger reference to the surroundings of heritage assets would aid the policy in protecting the unique character of heritage assets. Comments were also made regarding the distinction between types of listed building and substantial or less than substantial harm.
- **5.78 HE2 Ironbridge Gorge World Heritage Site:** This policy received 1 comment from consultees. The response was very supportive and suggested that reference to the Iron Bridge Gorge Supplementary Planning Document and the allocated former AGA factory site could be relevant and improve the policy.
- **5.79 HE3 Listed Buildings:** This policy was strongly supported by consultees, comments highlighted the importance of strong justification for development which would impact listed buildings and their surroundings. Changes were also proposed to the format of the policy to improve clarity and effectiveness.
- **5.80 HE4 Conservation Areas:** This policy was generally supported by consultees, reference to the Conservation Area Appraisal would ensure that prospective applicants have all the relevant information available.
- **5.81 HE5 Buildings of Local Interest:** Comments on this policy expressed support, further clarity may be required within clause a) to prevent unnecessary demolitions.
- **5.82 HE6 Historic Parks and Gardens:** This policy received a single response, while generally supportive but requested incorporation of a hierarchical approach to harm and expansion of the evidence base to include registered parks.
- **5.83 HE7 Scheduled Monuments and Archaeology:** This policy was supported by consultees, however comments were made requesting that reference be made to non-designated of heritage assets be included within the policy as well as harm to the settings of heritage assets.

#### Minerals and Land

**5.84** The Council received 10 responses on this section of the Local Plan.

- **ML1 Mineral Safeguarding:** Responses requested that allocated sites be exempted from this policy, due to the need to provide certainty in the delivery against the Councils housing requirement.
- **ML2 Maintaining Aggregate Supplies:** This policy received 1 comment, the consultee requested a minor adjustment to the text and suggested that more mentions should be made to the importance of mineral extraction.
- **ML3 Mineral Development:** Policy was generally supported, comments were made asking that the wording is changed to clarify that in certain circumstances mineral extraction may be denied to protect the character of a place.
- **ML4 Land Stability:** This policy received a single comment, while generally supportive 5.88 the consultee felt the policy could be broadened to encompass all land stability matters arising from development proposals.
- **ML5 Land Contamination:** Comments on this policy were supportive, however it was stated that the policy could be stronger with regards to securing appropriate remediation on contaminated sites.

#### **Appendix**

- The council received 6 responses specifically to the Appendix and an additional 185 comments relating to site allocations.
- 5.91 Appendix A Housing Allocations: 171 comments were received regarding housing allocations. Comments raised issues of the need for infrastructure to accommodate growth, with particular focus on secondary school provision and access to medical facilities. Comments also raised concerns around flooding, traffic flows, road network and loss of green spaces. Comments regarding the three Sustainable Community sites are covered above under Policy HO2.
- 5.92 Appendix B Employment Allocations: This section received 9 responses. Consultees were generally supportive of the employment allocations although some felt that existing units should be filled before more are developed. Concerns were also raised around proximity of employment and residential areas shown on indicative master plans for the Sustainable Communities sites.
- Appendix C Mixed Use Allocations: This section received 5 responses. Comments regarding mixed use allocations asked for more specificity or alteration to what uses will be permitted.
- 5.94 Appendix D Developer Contributions Policy List: This appendices received no comments.
- Appendix E Hierarchy of Centres: No comments. 5.95
- 5.96 Appendix F List of Designated Sites of Biodiversity and Geodiversity: No comments.

### 6 Council response to the representations recieved

- **6.1** Officers have reviewed all of the duly made representations received and considered changes to the document as necessary. The Council propose a number of modifications to the Local Plan and will invite the inspector to consider them as part of the examination (see **Appendix H**). The minor modifications are offered as a means of reducing the length of the examination and removing unnecessary conflict. Most of the changes are corrections or minor alterations which clarify policies as a result of representations received. The Council does not consider they affect the soundness of the Plan overall. The minor modifications can be summarised as follows:
- **6.2 Introduction:** In response to feedback submitted during the regulation 19 consultation, the council are proposing that the plan period be adjusted to 2021 2041 to cover a 15 year period following adoption, resulting changes to dates and figures within the plan have been updated in the submission version of the plan to reflect this.
- **6.3 Vision, Priorities and Profile**: Minor alterations have been made to the wording within this chapter, changes include making reference to Parson and Venning Barracks in priority 5, referencing sport and physical activities within priority 6 as well as amending a reference in the natural environment section of the chapter. A correction was also made regarding future provision of new Local Nature Reserves.
- **6.4 Development strategy and strategic policies**: Alterations were made to this section to ensure continuity of figures across the plan, further clarification was added to multiple policies including S1, S4, S5, S6 and S7 as well as within supporting text.
- **6.5** For S1 clarity was provided on how the policy relates to Biodiversity Net Gain and a recognition that some woodland within the area is managed on a commercial basis.
- **6.6** S4 has been altered to better account for sustainable brownfield sites.
- **6.7** S5 now includes reference to protecting heritage assets and their settings, an alteration was also made to the wording of S5.4 to increase clarity.
- **6.8** S6 has been updated to address queries submitted with regards to what developments will be required to comply.
- **6.9** S7 has been amended to clarify details of developer contributions and include reference to trigger points for provision of infrastructure to ensure it is available when needed. Amended text to clarify the application of developer contributions claw back has been included.

#### **Development management policies**

- **6.10 Climate change:** Appropriate definitions have been provided for terms used in CC1. Alterations have also been made to remove duplication between CC1 and CC2. Some consultees also expressed concerns that the policy was too rigid, more flexible language has been added to address this.
- **6.11** CC2 has been amended to address consultee concerns of its impact on development viability.

- 6.12 The wording of CC3 has been update to make reference to heritage assets and their settings.
- 6.13 Policy CC4 has been updated to reflect changes to the Water Cycle study.
- The supporting text for this section has also been updated to reflect policy changes as well as recommendations from the Cumulative Impact Assessment in the Strategic Flood Risk Assessment (SFRA). New supporting sections are now in place to provide further clarity on what will be expected from developers with regards to flood mitigation and water management in particular when development may increase abstraction from ground water and surface water.
- CC5 was amended to, remove text "now or in the future" in line with consultee recommendations and to provide further clarity on where development will be supported and cross reference additional guidance from the Cumulative Impact Assessment in the SFRA.
- 6.16 Further clarification has been added to policy CC6, specifically point 1b which now references sites of biodiverse and ecological value.
- Green and natural environment: Policy NE1 has been updated to include a robust 6.17 definition of the term Lawton Principles per the request of consultees. Alterations have been made to supporting text paragraph and table 5 to correct errors in labelling and update figures in line with the rest of the plan. Clarification has been added to policy NE2 with regards to when the policy will be applied and how / where development will be expected to assess the potential impact on trees, hedgerows and woodlands.
- NE3 has been altered to improve clarity with regards to Biodiversity Net Gain and the policies relation to the statutory minimum standard. The policy also been reformatted to improve accessibility for readers.
- NE4 Further clarity has been provided within the policy with regards to the greening factor, specifically how and where it will be used.
- **Economy and centres:** Modifications have been made to policies, EC1, EC2, EC4, EC5, EC6, EC9 and EC11. In response to consultees further clarification has been added on the following:
- Specific constraints where development could impact on Ministry of Defence operations
- Marketing requirements relating to loss of employment land
- Permitted development uses within the Strategic employment areas
- Introduction of a 250m buffer around waste management facilities
- Town centre uses (reference has been included to Use class E)
- Floor space thresholds (clarifying that gross floor space includes amalgamation, subdivision, creation of mezzanine floors and amendments to existing planning conditions)
- Shutters (EC11. 1d now ensures shopfront shutters must be appropriate to the character of the shopfront)
- Corrections have been made within the policy with regards to references, repetition and in some areas the policy wording has been strengthened
- Housing: Having reviewed resident, developer and statutory consultee responses to this section of the plan corrections have been made to address issues regarding references and repetition. Some policies have been altered to provide further clarity on where and how

development will be delivered within the borough. Policies HO1, HO2, HO3, HO4, HO5, HO8, HO9, HO10, HO11 and HO12 have all received modifications to improve clarity and readability within the text. Supporting text has also been altered in certain areas to ensure continuity across the plan. Within HO2, reference has been included to preserving the visual character of Eyton and the Weald Moors through suitable green buffering.

- **6.23 Development design:** Policies DD1 and DD2have both been adjusted in response to consultee comments. Corrections have been made to improve readability of the section, as well as the inclusion of reference to strategic MOD sites within the borough and Sport England's Active Design and Design Coding Guidance. Further guidance has also been provided to reflect National Planning Policy.
- **6.24 Sustainable travel and transport networks:** ST1 and ST3 as well as some supporting text within the section have been altered in response to consultee comments in order to provide further clarity and reflect recommendations within the Infrastructure Delivery Plan.
- **6.25** Community infrastructure, culture and open space: Amendments have been made to Policies CI1, CI3 and CI4. Clarification on developer contributions has been added in particular developer provision of on and offsite infrastructure as well as reference to Policy S7 to emphasise the connection between the sections. Reference to glamping has also been included.
- **6.26 Historic environment:** Alterations have been made to multiple policies within this section of the plan to better reflect the council's goals of protecting heritage assets, their character and their surroundings. Corrections have been made to specific terminology to avoid misinterpretation. Reference to relevant acts, such as the Ancient Monuments Act 1882, have also been added.
- **6.27 Minerals and land:** Policies ML1, ML2, ML3 and ML5 have all been altered with the goal of providing clarification and further guidance with regards to Minerals and Land. Supporting text has also been added in relation to prior extraction on allocated sites.
- **6.28 Appendix:** Minor modifications have been made to the Appendices correcting errors within Appendix F, Table 12 and Table 13. The glossary has also been updated to reflect consultee feedback and provide clarification on the terms 'Forrest Communities', 'Design Brief' and 'Site Development Brief'.
- **6.29** The Council also proposes a number of minor modifications to the Policies Map (following Regulation 19 consultation) which amend the boundaries of the Green Network and update the status of Local Nature Reserves. A housing site HO26 has been included as white land rather than a housing allocation.

### 7 Summary of comments recieved relating to allocated sites

#### **Housing Site Allocations**

- HO1 Lodgewood Farm, Redhill: Consultees expressed concern that the allocated site is in conflict with Lilleshall Neighbourhood Plan and in proximity to Granville Landfill site.
- HO2 Old Park: No comments were received in relation to this site.
- HO3 Land South of the Dale Church Aston: HO3 received 11 comments, concern was
  raised around existing infrastructure specifically education infrastructure and the ability of
  the area to accommodate the development. Consultees also questioned the drainage
  capacity and accessibility of the area. Some consultees also noted that large amounts of
  development could impact negatively on the look, feel and character of Church Aston and
  highlighted objections made by residents during the regulation 18 consultation.
- HO4 Former Phoenix School, Manor Road: This allocation received 1 comment, the
  consultee requested footnote for HO4 to state development will be subject to demonstrating
  compliance with Cl2.
- HO5 Land North of Allscott Meads: This allocation received 3 comments, support was shown, however concern was raised with regards to the areas ability to accommodate such a development and the potential impact it may place on existing infrastructure. Consultees also highlighted flood risk within the area. A request was made to divide the allocation so it could come forward in a phased approach.
- HO6 Land South of Holyhead Road: One comment was made requesting that any development on this allocation be subject to a heritage impact assessment.
- HO7 Pink Skips: No comments were received in relation to this site.
- HO8 East of Dawley Road: This allocation received 4 comments, support was mixed, the
  developer requested the site capacity be increased from 83 to 150. Requests were also
  made to remove the allocation or reduce the number of proposed dwellings, consultees
  sited concerns of the negative effects more development in an already built up area could
  have.
- HO9 Land at Hilltop Farm, Waterloo Road: No comments were received in relation to this site.
- HO10 Land South of Plough Lane: This allocation received 4 comments, concerns focused
  on the potential impact on the canal and how development would relate to the Green
  Network. A consultee also noted the sensitivity of the allocation, citing previously rejected
  developments in the area as well as the distinct landscape of the area as an important
  feature to preserve.
- HO11 Land off Church Road, Lilleshall: This allocation received 23 comments, many raised concerns around the impact of development on existing infrastructure and facilities. Traffic and healthcare facilities were cited as areas of particular concern amongst consultees. Reference was also made to the sensitive nature of the site setting and the level of housing. The agent acting for the developer requested that the level of housing be reduced to 47 dwellings to meet the developer's aspirations for the site.
- HO12 Land West of Wellington Road: This allocation received 11 comments. Consultees
  requested a reduction in scale or removal of the site from the allocations expressing concern
  of impact on existing infrastructure and facilities and potential flood risk in the area. Particular
  local concern focussed on the retention of existing parking along Wellington Road as many
  homes are terraces and do not have on plot parking.
- *HO13 South of Hutchinson Gate:* This allocation received 3 comments, consultees requested more justification for the sites inclusion or that the site be removed from the allocations.

- HO14 Tafs Salop Ltd, Gower Street: No comments were received in relation to this site.
- HO15 Land West of Allscott Meads: This allocation received 2 comments, the response
  was mostly supportive although proximity to a rail line was noted as a possible constraint
  to the development of the site.
- HO16 AGA Site: This allocation received 2 responses, both were generally supportive, responses highlighted the site is located within the Ironbridge Gorge World Heritage Site and proposals will have to be sympathetic to this fact.
- HO17 Vasey Court: No comments were received in relation to this site.
- HO18 Old Railway Line, Church Aston: This allocation received 4 comments, consultees
  expressed concern that the existing road and education infrastructure is not equipped to
  deal with the development and thus need better justification or allocation should be removed.
- HO19 Malinslee, Telford: No comments were received in relation to this site.
- *HO20 Brandon Avenue, Shawbirch:* This allocation received 8 comments. Consultees expressed a desire that the site remain green space and not be developed.
- HO21 Land at Park Road, Dawley: No comments were received in relation to this site.
- HO22 Former Bush Hotel: No comments were received in relation to this site
- HO23 Land southern side of 26 Waters Upton: No comments were received in relation to this site
- HO24 Land at junction of Hay 25 Street, Tibberton: This allocation received 5 comments, consultees highlighted the site as having a low water table and potential flood risk of the area. It is also noted that the development would be outside the current boundary of Tibberton. Concern was also raised regarding access to the site along Hay Street.
- HO25 Car Park adjacent to Police Station, Legges Way: This allocation received 1 response, the consultee was not in opposition to the site but requested a detailed site assessment prior to development, due to the proximity of the Ironbridge Gorge World Heritage Site.
- HO26 Land South of Old Vicarage: This allocation received 3 comments. There was general
  support, however, a ball strike risk assessment was requested as this could impact the
  number of housing units on the site. There was a comment on the need for verification that
  the land will cease to be grazing land.
- HO27 Little Dessert Shop, Bratton: No comments were received in relation to this site
- HO28 Land south and west of 15 Somerfield Road: One consultee responded to this site allocation and noted the proximity to a railway line as a potential constraint.
- HO29 Long Barn Stables Equestrian Centre: This allocation received 4 comments, a detailed assessment of any potential heritage impacts was requested as well as an amenity access study. Consultees also requested the site be expanded to include the public highway to the south.
- HO30 Land South of St Michael's Church, Lilleshall: This allocation received 12 comments, requests were made to reduce the scale of development. Consultees highlight a potential contradiction with the Lilleshall Neighbourhood Plan and raise their concerns that the existing infrastructure in the village is not suitable to accommodate the development.
- *HO31 Land at Badhan Factory*: One response was received for this allocation, the consultee supported the inclusion.
- HO32 Land between Hartbridge Road and Beverley Roundabout, Oakengates: One
  consultee commented on this allocation, expressing full support for the development of the
  site.
- HO33 Land Opposite Shawbirch PH: One consultee commented on this allocation, expressing full support for the development of the site.

- *HO34 Former Cross Keys Public House:* One consultee commented on this allocation, expressing full support for the development of the site.
- HO35 Land at 2 Arleston Lane: One consultee commented on this allocation, expressing full support for the development of the site.

#### **Employment Site Allocations**

- EC1 East of Dawley Road: Mixed support, one request to remove or reallocate site as a
  green wedge and another requested the allocation be extended to include MOD land around
  the Humbers.
- EC2 Land East of A518: Allocation was supported by consultees.
- EC3 Land north of A518: No comments were received in relation to this site.
- EC4 Land southeast Newport Town Centre: One comment in support
- EC5 Land at AGA Rangemaster, Waterloo Road: No comments were received in relation to this site.
- EC6 Land at Madeley Court Way: No comments were received in relation to this site.

#### Mixed Use Site Allocations

- MU1 Land off Ironmasters Way: No comments were received in relation to this site.
- MU2 Blue Willow Car Park: One response was received in relation to this allocation, the
  consultee requested the reference to 'employment land' be amended to refer to 'main town
  centre uses'.
- MU3 Lime Green Car Park: One response was received in relation to this allocation, the
  consultee requested the reference to 'employment land' be amended to refer to 'main town
  centre uses'.
- MU4 Land at Southwater Phase 2: No comments were received in relation to this site.
- MU5 Agriculture House, Southwater Way: This allocation was supported by the one response received.
- MU6 Former Wilkinson Site: No comments were received in relation to this site
- MU7 Telford Station: One comment was received in relation to this allocation, the consultee
  noted the proximity of the development to a railway line and the potential constraints this
  may cause.
- *MU8 Mere Park:* One consultee responded to this allocation, requesting it be changed from mixed use to a specialist older person's accommodation allocation.
- MU9 Wheat Leasows: One response was received in relation to this allocation, the consultee
  did not object to the allocation but noted the potential impact on the surroundings and ask
  this be properly accounted for.

#### **Non-Allocated Sites**

- 171 Allocate as housing
- 217 Allocate as housing
- 233 Allocate as housing
- 257 Include within EC1
- 302 Not allowing for roads or footpaths
- 323 Allocate as employment
- 349 Allocate as housing
- 356 Allocate as employment
- 364 Allocate as employment

- 397 Allocate as housing
- 399 Allocate as housing
- 400 Allocate as housing
- 413 Not allowing for roads or footpaths
- 436 Object to the site
- 442 Object to the site
- 484 Allocate as housing
- 620 Allocate as housing
- 665 Allocate as housing
- 694 Allocate for specialist living
- 696 Not allowing roads and footpath
- 710 Reallocate as employment

### 8 Appendix A - List of Consultees

| Ward Members (54)                                   | Hayfield Homes                        |
|---|---------------------------------------|
| Town and Parish Councils (33)                       | Horsehay Ltd                          |
| Telford & Wrekin Council internal stakeholders (36) | Jessup Brothers                       |
| Birmingham City Council                             | Kendrick Homes                        |
| Cannock Chase Council                               | Ling Developments Ltd                 |
| Dudley Metropolitan Borough Council                 | Living Space Housing                  |
| East Staffordshire Borough Council                  | Lovell                                |
| Herefordshire Council                               | Morris Property                       |
| Lichfield District Council                          | Mvkelly                               |
| Malvern Hills/Wychavon District Council             | Novus Property Solutions              |
| Newcastle Borough Council                           | Oliver Hardy Homes                    |
| Sandwell Metropolitan Borough Council               | Paul North Developments               |
| Shropshire Council                                  | Paveaways                             |
| South Staffordshire Council                         | Persimmon Homes West Midlands         |
| Stafford Borough Council                            | Project 10 Management Development Ltd |
| Staffordshire County Council                        | Pryce Builders                        |
| Stoke-on-Trent City Council                         | Results Communications                |
| Tamworth Borough Council                            | S J Roberts                           |
| Walsall Metropolitan Borough Council                | Shropshire Homes                      |
| Wolverhampton City Council                          | Studio Severn Architects              |
| Worcester City Council                              | Taylor Wimpey                         |
| Wyre Forest District Council                        | TC Homes                              |
| The Environment Agency                              | Thomas Consulting                     |
| Historic England                                    | Wise Living                           |
| Natural England                                     | Wardell Armstrong LLP                 |
| Civil Aviation Authority                            | MCDDC                                 |

| Mayor of London   | Wake Morley Architects Ltd            |
|---|---------------------------------------|
| Homes England   | S+SA Architects                       |
| Shropshire and Telford and Wrekin Integrated Care Board | Urbanissta Ltd                        |
| Office of Road and Rail Regulation                      | Prohaus Design Limited                |
| Transport for London                                    | Indigo Architecture Limited           |
| Telford & Wrekin – Local Highway Authority              | Alex Hudson Architectural Ltd         |
| Telford & Wrekin – Lead Local Flood Authority           | AHR Building Consultancy              |
| Marine Management Authority                             | Berrys                                |
| Shropshire Fire & Rescue                                | Qu-est Design and Planning            |
| West Mercia Police                                      | Central Design Consultants            |
| West Midlands Ambulance Service                         | ASG Architects Limited                |
| Severn Trent Water                                      | CadTech Design                        |
| Arriva Bus  | Andrews Building Conservation Ltd     |
| West Midlands Trains                                    | Inventive Design Associates           |
| Midlands Connect  | Advance Land and Planning Limited     |
| Shropshire Council - Waste                              | Midlands Building Consultancy         |
| Staffordshire County Council - Waste                    | DJD Architects                        |
| Environment Agency                                      | Rev-A Associates                      |
| National Gas Transmission                               | Lime Green Associates                 |
| National Grid Electricity Distribution                  | TEQT STUDIO                           |
| Cadent  | Pegasus Group                         |
| National Highways                                       | Ashley Davis Architects               |
| Transport for Wales Trains                              | A P Architects                        |
| Network Rail  | Davies & Co                           |
| Open Reach (BT)   | Newcombe Farrer Holt Architecture Ltd |
| Virgin Group  | Johnson Design Partnership            |
| Mobile UK (formerly Mobile Operators Association)       | DPA Limited                           |

| Veolia                           | Fisher German LLP                                     |
|----------------------------------|---|
| Strine Internal Drainage Board   | Arrol Architects                                      |
| Sport England                    | Barbers Rural Consultancy LLP                         |
| Ofwat                            | Heeleys   |
| ICOMOS-UK                        | Nicholas Taylor + Associates                          |
| Accord Group                     | Oliver Architecture                                   |
| BVT                              | CK Architectural                                      |
| Bromford                         | SLR Consulting Limited                                |
| Connexus                         | Studio Undercover                                     |
| Housing Plus Group               | Barnett Ratcliffe Partnership                         |
| Sanctuary                        | Plan A (North West) Limited                           |
| Severnside Housing               | NextPhase Development Ltd                             |
| Shropshire Rural Housing         | Amberon   |
| Trident Group                    | Amey  |
| Walsall Housing Group            | Anwyl Homes   |
| Wrekin Housing Trust             | Asset Construction                                    |
| Bournville Village Trust         | Barratt West Midlands                                 |
| Wrekin Housing Group             | Cadsquare-Midlands                                    |
| Transition Telford               | Cameron Homes/Galliers Central & Country Deveolpments |
| Shropshire Good Food Partnership | Countryside   |
| Save our Shropshire              | Crown and Civil Engineers                             |
| Climate Action Hub               | David Wilson Homes                                    |
| Days Homes                       | Embark Architecture                                   |
| Fletcher Homes                   | Green Planning Studio Ltd                             |
| Harworth Group                   |   |
|                                  |   |

Approximately 2,500 residents and additional organisations were also contacted via the Local Plan database, and a further 1,400 via the newsletter updates. This includes residents, developers, agents, Local Planning Authorities etc.

9 Appendix B - Telford & Wrekin Local Plan review Regulation 19 legal notice

BOROUGH OF TELFORD AND WREKIN TELFORD & WREKIN LOCAL PLAN DEVELOPMENT PLAN DOCUMENT PLANNING AND COMPULSORY PURCHASE ACT 2004 THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) **REGULATIONS 2012** 

Borough of Telford & Wrekin ("the Council") are in the process of developing a new Local Plan and have produced the publication version of the Telford & Wrekin Local Plan which the Council propose to submit to the Secretary of State. The Council

is now publishing this version of the Telford & Wrekin Local Plan in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 to enable those interested to make representation. The document is titled the Telford & Wrekin Local Plan - Publication Version. It sets out how the Local Plan will guide the future development and growth of the area, indicate where development will take place in the administrative area of Borough of

Telford and Wrekin ("the Borough"), and guide future planning decisions up to 2040. The Telford & Wrekin Local Plan, when adopted, will form part of the development plan for the Borough. The Telford & Wrekin Local Plan will cover the whole of the Borough.

The publication period during which representations can be made runs from Monday 17 March 2025 until 4pm on Monday 5 May 2025. All representations on the document must be received by the Council no later than 4pm on Monday 5 May 2025. Representations may be made in writing or by way of electronic communications to

the following addresses and in the following ways: · Online at: www.telfordandwrekinlocalplan.co.uk

Via email to: localplan@telford.gov.uk

· Writing to: Strategic Planning Team, Prosperity & Investment, Telford & Wrekin Council, PO Box 457, Telford, TF2 2FH.

(Representation Forms have been prepared and are available if required online at www.telfordandwrekinlocalplan.co.uk)

Representations may be accompanied by a request to be notified at a specified

address of the following -. The submission of the Telford & Wrekin Local Plan for independent examination

under Section 20 of the Planning and Compulsory Purchase Act 2004.

· The publication of the recommendations of the person appointed to carry out the independent examination.

. The adoption of the Telford & Wrekin Local Plan (2040). During the publication period the Telford & Wrekin Local Plan and all other documents which the Council is required to publish and the proposed submission documents can be viewed on the Council's website www.telfordandwrekinlocalplan.co.uk. In addition, hard copies are available for

inspection at the following locations. (Opening hours for the Council's principal offices are shown below. Opening hours for the other named places are available on the Council's website www.telford.gov.uk/libraries): · Dawley and Malinslee Community Library - Dawley House, 22 Burton Street,

Dawley, TF4 2ES

· Madeley Library and First Point - The Anstice, Park Avenue, Madeley,

Telford, TF7 5BB · Wellington Library - Wellington Civic and Leisure Centre, Larkin Way, Wellington,

Telford, TF1 1LX

· Southwater Library - Southwater Square, Southwater Way, Telford, TF3 4JG · Stirchley Community Library - The Sambrook Centre, Stirchley, Telford, TF3 1FA

· Newport Library - 53 - 55 High Street, Newport, TF10 7AT · Oakengates Library - the Wakes, Theatre Square, Oakengates, TF2 6EP

· Brookside Central (formerly Brookside Community Centre) - Burford, Brookside, Telford, TF3 1LP · Donnington Community Hub - St Matthews Road, Donnington, Telford, TF2 7RB

. Hub on the Hill (formerly Sutton Hill Community Centre) - 104-106 Southgate, Sutton Hill, Telford TF7 4HG

· Leegomery Community Centre - Leegate Avenue, Leegomery, Telford, TF1 6NA

· Park Lane Centre - Park Lane, Woodside, Telford, TF7 5QZ

· Donnington Library, Turreff Avenue, Donnington, Telford, TF2 8HG.

 Hadley Library, Hadley Learning Community, Crescent Road,

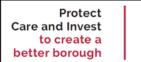
Hadley,

Telford, TF1 5NU. If you wish to speak to a member of the Strategic Planning Policy team or leave a

message in respect of this publication, please contact the Strategic Planning team email at: localplan@telford.gov.uk or on 01952 384241. James Dunn

Director of Prosperity & Investment 17 March 2025

10 Appendix C – Standardised representation form





# Telford and Wrekin Publication Version of the Local Plan Public consultation 17 March to 5 May 2025

### Physical consultation response form (Regulation 19)

Please use this form if you wish to comment on the Telford and Wrekin Publication Version of the Local Plan. Further information can be found on the Councils website at <a href="https://www.telfordandwrekinlocalplan.co.uk">www.telfordandwrekinlocalplan.co.uk</a>

This form may be scanned or returned via e-mail to: LocalPlan@telford.gov.uk

Or alternatively by post to; Strategic Planning Team, Telford & Wrekin Council, Southwater One, TF2 2FH

### How we will use your information

The information you have provided will be used to inform the next draft of the Telford and Wrekin Local Plan. We will only publish anonymised responses, parts of responses, or a summarised version of responses and will ensure individual survey respondents cannot be identified. This information is being processed under DPA – Schedule 2 (2a) (GDPR 2018 -Article 6 (1)e).

We will not share your personal information with any other external third parties unless required/permitted to do so by law. Your personal information will be held securely, and if shared it will be shared securely. We comply with data protection laws concerning the protection of personal information, including the General Data Protection Regulation (GDPR). For more information on how information is held by Telford & Wrekin Council please view the privacy page at <a href="https://www.telford.gov.uk/terms">https://www.telford.gov.uk/terms</a>

We are asking for your personal details to allow us to contact you where we require clarification/further information. You do not have to include your personal details but not doing so might affect the council's ability to act on the information you have provided.

### Personal Details

| Title                                 |  |
|---------------------------------------|--|
|                                       |  |
| First Name                            |  |
| Last Name                             |  |
| Address                               |  |
| Commenting on behalf of (if relevant) |  |
| Organisation (if relevant)            |  |
| Telephone                             |  |
| Email                                 |  |



NOTE: The questions below are numbered 1 to 6. Please attach any typed or written responses related to the questions below when submitting this form.

The Council must submit a plan for examination which it considers is "sound" – namely that it is; positively prepared, justified, effective and consistent with national policy.

- Positively prepared the Local Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, how the Councils considered requests to contribute towards development requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** the Local Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base;
- **Effective** the Local Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy the Local Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

Therefore we require you to respond as to which of these statements you consider the Local Plan to comply with.

| Q1: Which part of the Local Plan does this comment relate to? Please state clearly a chapter, paragraph number, policy number, site allocation reference or map or diagram title. |
|---|
|   |
|   |
| Q2: Do you consider that this part of the plan is:  |
| ☐ Legally compliant   |
| □ Sound   |
| ☐ Compliant with Duty to Co-operate   |
| ☐ None of the above   |
|   |





| Q3: Please give details of why you consider this part of the Local plan is not legally compliant, or is unsound, or fails to comply with the duty to co-operate. Please be as precise as possible. |
|--|
| Alternatively If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.         |
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Q4: Please set out what modification(s) you consider necessary to make the Local Plan legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness. You will need to say why this modification will make the Local Plan legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.





| <b>Q5:</b> If your representation is seeking a modification, do you consider it necessary to participate in examination hearing session(s)?   |
|---|
| ☐ No, I do not wish to participate in hearing session(s)  |
| ☐ Yes, I wish to participate in hearing session(s)  |
|   |
| Of If you wish to portioinate in the bearing appoint(s), places outline why you consider this to be   |
| <b>Q6:</b> If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.  |
| Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination. |
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11 Appendix D - Press release on starting consultation



# Media release

Protect, care and invest to create a better borough

01952 383830 | media@telford.gov.uk | https://newsroom.telford.gov.uk

PR 13035 FOR IMMEDIATE RELEASE Monday 17 March 2025

# Final public review opens for Telford and Wrekin Council Local Plan

Telford & Wrekin Council has approved the next stage of its Local Plan review, marking a key milestone in shaping the borough's future until 2040.

The Local Plan will shape the borough's future by securing investment in infrastructure, such as schools and transport networks whilst creating jobs, and delivering quality homes, all while protecting Telford and Wrekin's green spaces and heritage.

Following extensive public consultation at the draft plan stage which closed in January 2024 the Council have updated the Local Plan and following Full Council approval last month, the Regulation 19 public review opens today (17 March 2025) and will run for seven weeks until 5 May 2025.

This is the final opportunity for residents, businesses, and stakeholders to submit formal comments on matters of soundness and legal compliance before the plan is submitted to the Government's Planning Inspectorate for independent examination.

The Telford and Wrekin Local Plan sets out how the borough will grow sustainably, ensuring the right homes, jobs, infrastructure, and green spaces are in place to support local communities. The plan includes proposals for new housing to meet the needs of young people, families, and older residents, as well as creating new jobs by supporting business growth and attracting new investment.

It also outlines plans for six new schools, expanded healthcare services, and improvements to transport networks. Protecting and enhancing Telford's green spaces is a priority, alongside tackling climate change by promoting energy-efficient buildings and sustainable development.

The Regulation 19 review is being published to allow the public and stakeholders to make their final comments on the Local Plan. The comments made will then be submitted to the independent nationally appointed Planning Inspector who will consider them alongside the need for any amendments to the plan before it is formally adopted

Councillor Carolyn Healy, Telford & Wrekin Council Cabinet Member for Neighbourhoods, Planning & Sustainability, said: "This is a key step in delivering a robust and sustainable plan for Telford and Wrekin. We've listened to feedback from our communities, businesses, and partners to shape a Local Plan that ensures the borough develops in the right way.

"The plan provides a framework for the development of our borough until 2040, ensuring a good supply of quality homes for residents of all ages, from new families setting up their first homes to older residents looking to downsize locally, plus accessible and adaptable properties that meet lifetime needs. Alongside these homes, the plan will protect important green spaces, deliver new employment opportunities, increase the number of schools in the borough and improve infrastructure.

"This is the last opportunity for residents and stakeholders to have a say on the plan's soundness before it is submitted for independent examination."

The Regulation 19 public review runs from 17 March to 5 May 2025. All responses will be considered by the national Planning Inspectorate, which will independently assess the Telford and Wrekin Local Plan before it is formally adopted.

For more information and to submit comments, visit: www.telfordandwrekinlocalplan.co.uk

-ENDS-

### 12 Appendix E - Local media coverage

| What              | Who  | When   | Notes  |
|-------------------|--|--|--|
| Media<br>briefing | BBC Radio<br>Shropshire and<br>Shropshire Star | 5 February<br>2025                                     |  |
| PR                | All local and regional media outlets           | News<br>release<br>published on<br>5 February<br>2025  | Coverage picked up and featured on:  6 Feb -  10 Feb – Media coverage: Radio Shropshire broadcast inc. interview with Carolyn (MP4 available)  11 Feb – Media coverage: BBC Online: Future house building to be discussed by council: https://www.bbc.co.uk/news/articles/cwy720e3n1do  15 Feb: Media coverage: Shropshire Star:   |
| PR                | All local and regional media outlets           | News<br>release<br>published on<br>27 February<br>2025 | Coverage picked up and featured on:  28 Feb – press release:  http://www.trustileonfew@25000ffclwdireonfroefwack/testareie/  03 Mar – Media coverage: Shropshire Live:  http://www.trustileonfew@25000ffclwdireonfroefwack/testareie/  04 Mar – Media coverage: Shropshire Star:  04 Mar – Media coverage: BBC Online:  Debate clashes over plan for thousands of homes:  https://www.bbc.co.uk/news/articles/c04zdnzg3kko (corrected 5 March) |
| PR                | All local and regional media outlets           | News<br>release<br>published on<br>17 March<br>2025    | Coverage picked up and featured on:  17 March – press release  http://www.northchpukrewsrap.libeiewgershithchroundershin  18 Mar – Media coverage: Telford Live  http://www.northchroundershin.  |

| 18 Mar – Media coverage: Shropshire S |
|---------------------------------------|
|---------------------------------------|

13 Appendix F - Copy of posters produced for public buildings



# Telford and Wrekin Local Plan Review

2020 - 2040

# Local Plan Review (Regulation 19) PUBLICATION VERSION

The Publication Version of the Telford & Wrekin Local Plan review has now been published alongside recommended site allocations, providing a planning framework up to 2040.

Have your say on matters of soundness and legal compliance between **Monday 17 March and Monday 5 May 2025.** 

For more information, visit our website www.telfordandwrekinlocalplan.co.uk



### 14 Appendix G – Number of representations made

| Chapter  | Policy  | No. of                           | Legally Compliant |          | Sound    | Unsound   |
|--|---------|----------------------------------|-------------------|----------|----------|-----------|
|  |         | Consultees<br>(no.of<br>comments | Yes               | No       |          |           |
| Local Plan   | Total   | 365 (1077)                       | 49 (231)          | 91 (186) | 36 (118) | 144 (435) |
| Foreword (1)   | Chapter | 1                                | 0                 | 0        | 1        | 0         |
| Introduction (2)   | Chapter | 0                                | 0                 | 0        | 0        | 0         |
| Vision,<br>Priorities<br>and Profile<br>(3)              | Chapter | 17 (18)                          | 5                 | 3        | 2        | 9         |
| Development<br>strategy and<br>strategic<br>policies (4) | Chapter | 53 (137)                         |                   |          |          |           |
| 4  | S1      | 15 (16)                          | 3                 | 4        | 4        | 7         |
| 4  | S2      | 15 (15)                          | 6                 | 4        | 3        | 6         |
| 4  | S3      | 10 (10)                          | 4                 | 1        | 0        | 3         |
| 4  | S4      | 33 (34)                          | 14                | 6        | 3        | 20        |
| 4  | S5      | 13 (13)                          | 5                 | 0        | 5        | 4         |
| 4  | S6      | 17 (17)                          | 7                 | 1        | 6        | 4         |
| 4  | S7      | 23 (23)                          | 8                 | 4        | 1        | 13        |
| Development management policies (5)                      | Chapter | 0                                |                   |          |          |           |
| Climate change (6)                                       | Chapter | 33 (70)                          |                   |          |          |           |
| 6  | CC1     | 19 (20)                          | 9                 | 1        | 2        | 9         |
| 6  | CC2     | 18 (18)                          | 9                 | 0        | 1        | 7         |
| 6  | CC3     | 4 (4)                            | 0                 | 2        | 1        | 2         |
| 6  | CC4     | 10 (10)                          | 2                 | 3        | 1        | 5         |
| 6  | CC5     | 13 (13)                          | 4                 | 3        | 3        | 7         |

| 6                                 | CC6     | 4 (4)     | 0  | 1  | 1 | 1  |
|-----------------------------------|---------|-----------|----|----|---|----|
| Green and natural environment (7) | Chapter | 57 (115)  |    |    |   |    |
| 7                                 | NE1     | 15 (15)   | 4  | 4  | 2 | 6  |
| 7                                 | NE2     | 22 (22)   | 4  | 1  | 3 | 12 |
| 7                                 | NE3     | 31 (32)   | 10 | 2  | 2 | 17 |
| 7                                 | NE4     | 20 (20)   | 8  | 1  | 3 | 8  |
| 7                                 | NE5     | 9 (9)     | 0  | 2  | 2 | 3  |
| 7                                 | NE6     | 5 (5)     | 1  | 2  | 2 | 2  |
| 7                                 | NE7     | 7 (7)     | 0  | 3  | 2 | 5  |
| Economy<br>and centres<br>(8)     | Chapter | 23 (28)   |    |    |   |    |
| 8                                 | EC1     | 8 (8)     | 6  | 0  | 2 | 2  |
| 8                                 | EC2     | 2 (2)     | 0  | 0  | 0 | 0  |
| 8                                 | EC3     | 5 (5)     | 2  | 3  | 1 | 3  |
| 8                                 | EC4     | 1 (1)     | 0  | 1  | 0 | 1  |
| 8                                 | EC5     | 3 (3)     | 0  | 0  | 0 | 1  |
| 8                                 | EC6     | 1 (1)     | 1  | 0  | 0 | 1  |
| 8                                 | EC7     | 0         | 0  | 0  | 0 | 0  |
| 8                                 | EC8     | 2 (2)     | 0  | 0  | 0 | 0  |
| 8                                 | EC9     | 2 (2)     | 1  | 0  | 0 | 1  |
| 8                                 | EC10    | 1 (1)     | 1  | 0  | 1 | 0  |
| 8                                 | EC11    | 1 (1)     | 0  | 0  | 1 | 0  |
| Housing (9)                       | Chapter | 294 (466) |    |    |   |    |
| 9                                 | HO1     | 23 (25)   | 8  | 5  | 8 | 11 |
| 9                                 | HO2     | 98 (118)  | 12 | 28 | 2 | 54 |
| 9                                 | НО3     | 25 (25)   | 7  | 1  | 3 | 13 |
| 9                                 | HO4     | 13 (13)   | 5  | 0  | 1 | 8  |

| 9   | HO5     | 15 (15) | 3 | 1 | 3 | 5  |
|---|---------|---------|---|---|---|----|
| 9   | HO6     | 6 (6)   | 1 | 2 | 1 | 4  |
| 9   | НО7     | 0       | 0 | 0 | 0 | 0  |
| 9   | HO8     | 2 (2)   | 1 | 0 | 1 | 0  |
| 9   | НО9     | 1 (1)   | 0 | 0 | 1 | 0  |
| 9   | HO10    | 3 (3)   | 0 | 0 | 0 | 3  |
| 9   | HO11    | 17 (17) | 7 | 0 | 1 | 9  |
| 9   | HO12    | 10 (10) | 2 | 4 | 1 | 5  |
| 9   | HO13    | 2 (2)   | 0 | 0 | 0 | 1  |
| Development design (10)                               | Chapter | 19 (31) |   |   |   |    |
| 10  | DD1     | 16 (16) | 7 | 3 | 4 | 7  |
| 10  | DD2     | 9 (9)   | 4 | 1 | 2 | 4  |
| 10  | DD3     | 0       | 0 | 0 | 0 | 0  |
| 10  | DD4     | 3 (3)   | 1 | 1 | 0 | 1  |
| 10  | DD5     | 2 (2)   | 0 | 0 | 1 | 0  |
| 10  | DD6     | 0       | 0 | 0 | 0 | 0  |
| Sustainable travel and transport networks (11)        | Chapter | 47 (71) |   |   |   |    |
| 11  | ST1     | 17 (17) | 8 | 1 | 5 | 5  |
| 11  | ST2     | 2 (2)   | 0 | 0 | 1 | 0  |
| 11  | ST3     | 28 (28) | 5 | 5 | 1 | 19 |
| 11  | ST4     | 8 (8)   | 1 | 1 | 1 | 2  |
| 11  | ST5     | 13 (13) | 4 | 1 | 4 | 3  |
| Community infrastructure, culture and open space (12) | Chapter | 13 (18) |   |   |   |    |
| 12  | CI1     | 6 (7)   | 3 | 1 | 2 | 1  |

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| 12                        | CI2     | 2 (2)   | 0 | 0 | 1 | 0 |
|---------------------------|---------|---------|---|---|---|---|
| 12                        | CI3     | 5 (5)   | 2 | 1 | 1 | 2 |
| 12                        | CI4     | 3 (3)   | 1 | 0 | 2 | 0 |
| 12                        | CI5     | 0       | 0 | 0 | 0 | 0 |
| Historic environment (13) | Chapter | 8 (21)  |   |   |   |   |
| 13                        | HE1     | 8 (8)   | 2 | 2 | 1 | 4 |
| 13                        | HE2     | 1 (1)   | 0 | 0 | 0 | 1 |
| 13                        | HE3     | 3 (3)   | 0 | 0 | 1 | 1 |
| 13                        | HE4     | 2 (2)   | 0 | 0 | 0 | 1 |
| 13                        | HE5     | 3 (3)   | 0 | 0 | 0 | 1 |
| 13                        | HE6     | 1 (1)   | 0 | 0 | 0 | 1 |
| 13                        | HE7     | 2 (2)   | 0 | 0 | 0 | 1 |
| Minerals and land (14)    | Chapter | 10 (12) |   |   |   |   |
| 14                        | ML1     | 4 (4)   | 1 | 0 | 0 | 2 |
| 14                        | ML2     | 1 (1)   | 1 | 0 | 0 | 0 |
| 14                        | ML3     | 2 (2)   | 1 | 0 | 0 | 1 |
| 14                        | ML4     | 1 (1)   | 0 | 0 | 1 | 0 |
| 14                        | ML5     | 2 (2)   | 0 | 1 | 0 | 1 |

15 Appendix H – Minor modifications

### Telford and Wrekin Local Plan – Schedule of Suggested Modifications

The Council has prepared this schedule of suggested modifications which it wishes the Inspector to consider along with the Local Plan which it has submitted to the Planning Inspectorate for public examination. This is a live document and will be updated during the examination. The modifications have been prepared as a result of:

- Representations received during the Regulation 19 exhibition that go to the soundness of the Local Plan.
- Modifications that are necessary in response to a change in legislation or national policy.
- Representations that suggest changes which, if incorporate, would help clarify policies.
- Representations that correct facts or correct grammatical and spelling errors.
- Modifications that are necessary in response to a change in legislation.

This schedule sets out proposed wording amendments, correction of factual errors or similar. Proposed deletions are shown as a strikethrough and proposed additions are in **bold**.

| Modification | Respons         | Pag | Para No. | Modification  | Rationale              |
|--------------|-----------------|-----|----------|---|------------------------|
| MOD001       | e ID<br>Council | n/a | General  | Letter ordering has been amended throughout the plan, an example of the amendment is shown below.   | To improve readability |
|              |                 |     |          | 1. When selecting heating systems it is expected that the following hierarchy will be followed:   |                        |
|              |                 |     |          | a. New development should be connected to existing classified heat networks or new classified heat networks from the point of occupation; b. New development should be designed with a communal heating system which could connect to future heat networks; then c. Sustainable alternatives to heat networks such as individual renewable heat should be utilised. |                        |
|              |                 |     |          | 2. When selecting cooling systems it is expected that the following hierarchy will be followed:   |                        |
|              |                 |     |          | <ul> <li>d-a. Minimising excessive solar gain such as through building orientation, shading and green infrastructure; then</li> <li>e-b. Maximise passive cooling such as through natural ventilation, green infrastructure and blue infrastructure; and then</li> </ul>  |                        |

|              |                |         |                | £c. Address residual cooling load through renewable sources.  |  |
|--------------|----------------|---------|----------------|---|--|
| MOD002       | O56            | 3       | Para 1.1       | All references to the plan period throughout the Local Plan should be amended to reflect an adjusted plan period of 2020 to 2041.   | The Council delayed release of the Regulation 19 consultation to ensure the Plan is considered under the most up to date version of the NPPF, this has necessitated extending the plan end date to 2041 to ensure 15 years from adoption as set out in the NPPF.               |
| Vision, Prio | rities and Pro | ofile   |                |   |  |
| MOD003       | Council        | 17      | Para 3.6       | Objectives: Deliver a minimum 16 <b>79</b> ha employment land up to 2040 to support investment and job creation;  | Updated figure due to the delayed release of the Regulation 19 consultation to ensure the Plan is considered under the most up to date version of the NPPF, this has necessitated extending the plan end date to 2041 to ensure 15 years from adoption as set out in the NPPF. |
| MOD004       | Council        | 17      | Para 3.8       | Objectives: Meet the housing needs of the borough through delivery of 20,200680 homes up to 20401 across a range of types and tenures   | Updated figure due to the delayed release of the Regulation 19 consultation to ensure the Plan is considered under the most up to date version of the NPPF, this has necessitated extending the plan end date to 2041 to ensure 15 years from adoption as set out in the NPPF. |
| MOD005       | DIO            | 17      | Para 3.10      | Telford faces challenges – the legacy of the original New Town – with ageing infrastructure and the fabric of some of the town's estates, particularly in South Telford now requiring physical regeneration. As well as sites such as Parsons and Venning Barracks which represent a significant opportunity to regenerate brownfield land.   | Addition as constitutes a brownfield regeneration opportunity.   |
| MOD006       | E128           | 18      | Para 3.12      | Factors include property conditions, development design and access to healthy food and sports and physical activity, opportunities for education, outdoor amenity space and employment.  The Local Plan will help deliver the objectives of the Joint Strategic Needs Assessment (JSNA), Playing Pitch and Outdoor Recreation Strategy, Indoor Leisure Strategy and the boroughs Health and Wellbeing Strategy. | Addition of relevant documents as sports and physical activity plays an important role in health and well-being.   |
| MOD007       | O22            | 20      | Para 3.15      | The borough has an extensive green and natural environment including 8 Sites of <b>Special</b> Scientific Interest.   | Correction   |
| MOD008       | O22            | 20      | Para 3.15      | In addition to the 20 designated Local Nature Reserves, at least three further LNRs will be designated during the plan period   | Correction   |
|              | nt Strategy a  | nd Stra | tegic Policies |   |  |
| MOD009       | Council        | 25      | Para 4.2       | The Local Plan has identified a housing requirement of around 20, <del>200680</del> , of which <b>over</b> 5 <del>7.5</del> <b>0</b> % of these homes have already been identified in the Councils housing supply   | Clarification to reflect increase in housing need figure.  |
| MOD010       | Council        | 25      | Para 4.7       | Over the course of the plan period 2021 to 20410 the Council are planning for around 17,372785 homes in and on the edge of Telford., this includes 9,060 homes already  | Updated figure due to the delayed release of the Regulation 19 consultation to ensure the Plan is considered under the most up to date   |

|        |         |    |                        | consented or completed. This means the Council is planning for around 8,312 net new homes coming forward for Telford up to 2040.  | version of the NPPF, this has necessitated extending the plan end date to 2041 to ensure 15 years from adoption as set out in the NPPF.  |
|--------|---------|----|------------------------|---|--|
| MOD011 | Council | 26 | Para 4.12              | Over the course of the plan period the Council are planning for around 1,41448 new homes in or on the edge of Newport., of this over 1,239 homes have already been completed or have planning permission. This means the Council are planning for around 175 net new homes for Newport up to 2040.  | Correction per MOD008  |
| MOD012 | Council | 26 | Para 4.15              | Over the course of the plan period the Council are planning for around 1,41448 new homes for the rural area., of this over 1,313 homes have already been competed or have planning permission. This means the Council are planning for around 101 net new homes for the rural area up to 2040.  | Correction per MOD008  |
| MOD013 | E129    | 28 | S1                     | e. Helping to address the climate change and biodiversity crisis, <b>by securing a net gain in biodiversity and enhanced green infrastructure</b> .   | Further Clarification  |
| MOD014 | Council | 28 | Para 4.20              | 4.20in those areas. It is recognised that in some areas of the borough woodlands are managed on a commercial basis.   | Recognition of woodlands managed on commercial basis.  |
| MOD015 | E70     | 29 | Para 4.30              | Protected and priority species <b>impacted on</b> are also material planning considerations   | Further Clarification  |
| MOD016 | Council | 30 |                        | The Council is planning for the delivery of a minimum of 1679ha of employment land over the plan period.  | Updated figure due to the delayed release of the Regulation 19 consultation to ensure the Plan is considered under the most up to date version of the NPPF, this has necessitated extending the plan end date to 2041 to ensure 15 years from adoption as set out in the NPPF. |
| MOD017 | Council | 31 | Para 4.35              | The 16 <b>79</b> ha employment land requirement is informed by the Telford and Wrekin Economic and Housing Development Needs Assessment (EHDNA) Part 1 (2020) and 2 (2023) and the updated Newport Employment Land Needs Study (2023).  | Updated figure due to the delayed release of the Regulation 19 consultation to ensure the Plan is considered under the most up to date version of the NPPF, this has necessitated extending the plan end date to 2041 to ensure 15 years from adoption as set out in the NPPF. |
| MOD018 | E129    | 31 | New para<br>after 4.35 | The delivery of new employment land is supported by housing allocated within the Local Plan which will enable sustainable economic growth and the ongoing competitiveness of the borough as a destination for inward investment.  | Clarification of link between development of employment land and increased need for housing in the area  |
| MOD019 | Council | 31 | S4                     | <ol> <li>The council will deliver 20,200680 homes over the plan period (until 2041).</li> <li>The Council recognise the request of the Black Country Authorities for a contribution towards their unmet housing needs – therefore an offer of 153 dwellings per year over and above the boroughs housing need has been included within the 1,04034 per year requirement.</li> <li>c. on suitable brownfield sites a 'brownfield first' approach;</li> </ol> | Correction as brownfield first unjustified.  |

| MOD020 | Council | uncil 32 | Housing<br>trajectory<br>(After policy | 2,000   | Housing Allocation  |  | Updated housing trajectory.   |
|--------|---------|----------|--|---|---|--|---|
|        |         |          | \$4)                                   | 1,600  1,400  1,400  1,400  1,400  1,000  1,000  1,000  400  200  Actual Completions  Allocated Sites | Richita Riparia Ripata | ## Annual Housing Requirement  |   |
| MOD021 | Council | 32       | Table 4                                | Type Overall housing target   | Number of dwellings (net) 20, <del>200</del> 680  | Comments 1,04034 dwellings per year  | Updated figures due to the delayed release of the Regulation 19 consultation to ensure the Plan is considered under the most up to date     |
|        |         |          |  | Existing housing supply   | <del>11,612</del> <b>12,096</b>   | for 2020-2040  Commitments (sites with permission not expired), sites with resolution to grant planning approval and remaining Local Plan allocations and windfall allowance | version of the NPPF, this has necessitated extending the plan end date to 2041 to ensure 15 years from adoption as set out in the NPPF.     |
|        |         |          |  | Net supply from new allocations  Net new dwellings per  | 8,58 <b>84</b><br>429   | New housing allocations to meet the requirement  |   |
|        |         |          |  | annum from new allocations  | 723   |  |   |
| MOD022 | Council | 32       | Para 4.40                              | 4.40 An allowance of 60 120 d   | wellings per year   |  | Clarification to reflect review windfall figure.  |
| MOD023 | E70     | 33       | New para<br>after 4.41                 |   | ling equivalent figure of 126 th and recognised the scale   |  | Clarification relating to the basis of contribution towards black country LPAs request for assistance with unmet housing development needs. |

|        |         |    |                        | dwellings per annum as its contribution toward unmet housing needs arising in the Black Country area.   |   |
|--------|---------|----|------------------------|---|---|
| MOD024 | E173    | 33 | S5                     | k.) Historic assetsheritage assets and their settings'  | Correction and further clarification  |
| MOD025 | E135    | 34 | S5 part 4              | Sustainability Statements will be required to be submitted with applications for new development. They must demonstrate how the development will positively, and measurably, contribute to mitigating and adapting to climate change and local and national climate objectives including achieving-contributing to Net Zero.  | Point of clarification  |
| MOD026 | E104    | 35 | New para<br>after 4.50 | The Health and Wellbeing Board ensures that the Council and the Shropshire, Telford and Wrekin Integrated Care Board work effectively together in planning health and social care services to improve health and wellbeing in Telford and Wrekin as well as promoting integrated working among local providers and partners. As part of broader efforts to improve health and wellbeing of the population of the borough the Council work with an array of together partners such as Sports England.  | Reference to acknowledge the important role that these organisations play in the planning for and delivery of health infrastructure in the borough. |
| MOD027 | E116    | 35 | S6.1                   | Telford and Wrekin is varied and diverse community with an ageing population and residents with a range of health needs. In order to help improve the health and wellbeing of the boroughs communities, where relevant, development will be expected to   | Point of clarification  |
| MOD028 | Council | 36 | S7.1                   | infrastructure including highways as well as provision of affordable housing  | Addition to include affordable housing.   |
| MOD029 | Council | 36 | S7                     | 2. Contributions will be collected through Section 106 agreements which will be secured at appropriate trigger points, to be agreed with the council.   | Point of clarification on trigger points for s106 contributions.  |
| MOD030 | Council | 36 | S7                     | c. On-going revenue via <b>commuted sums</b> , such as <b>for</b> the management and maintenance of services and facilities; and  | Point of clarification  |
| MOD031 | E110    | 36 | S7.1                   | New, improved expanded, or enhanced infrastructure is necessary for the delivery of provision will be sought from new developments.   | Alteration of policy wording for clarity.   |
| MOD032 | E130    | 36 | S7.1                   | This can include <b>but is not limited to</b> community, education, open space and sustainable travel   | Included as not a defined list.   |
| MOD033 | Council | 36 | S7                     | upon completion, the review mechanism will be secured through an appropriate legal agreement.   | Point of clarification  |
| MOD034 | Council | 37 | S7.4                   | 4. For major developments (10 homes or more), \( \formalfont{W}\) where a viability case has been made the Council, at the planning application stage the Council reserve the right to review developments viability upon completion, or in the case of strategic schemes of over 500 units on completion of 60% of housing units. In all cases where a schemes gross development value against updated costs/normal profit has been exceeded the Council will claw back funding up to the delivery of a policy compliant scheme applicant shall pay a financial contribution equivalent to the uplift, capped at the value required to achieve full policy compliance. Any clawback contribution shall be used by the Council for the delivery of affordable housing and/or infrastructure in accordance with the priorities set out in the Local Plan or Infrastructure Delivery Plan | Alterations to provide further clarity regarding the clawback mechanism for financial contributions.  |
| MOD035 | Council | 37 | New para<br>after 4.57 | Assessments of infrastructure capacity may, on occasion, have cross boundary implications between Telford and Wrekin and neighbouring local planning authorities. This may require, where justified, the deployment of developer contributions on a cross boundary basis.   | Point of clarification for cross boundary implications accounting for neighbouring authorities.   |

| MOD036      | Council                           | 37 | Para 4.58              | In some cases the National Planning Policy Framework allows for developers to make a case for a reduction in contributions to allow developments to come forward. The council will resist a reduction in contributions and, where this does occur, will exercise its right to review and reassess the viability case on completion of a development and recoup any reduced contributions. Where the Gross Development Value (GDV) plus Consumer Prices Index (CPI) is exceeded at the point of completion the Council will recoup the difference up to meeting a full policy compliant scheme. Review mechanisms will take the form of a full reappraisal for schemes over 50 units and a lighter touch approach for schemes below 50 units, with a review of GDV against original costs plus Construction Prices Index, normal profit and land value. Reviews will be undertaken on a transparent open book approach. Affordable Homes delivered onsite without a section 106 obligation will not offset normal policy requirements. | Alterations to explanatory text providing further clarity on review mechanisms.       |
|-------------|-----------------------------------|----|------------------------|---|---|
| MOD037      | E114                              | 37 | Para 4.59              | Policies listed in <del>Annex C</del> <b>Appendix D</b>   | Correction  |
| Climate Cha |                                   |    |                        |   |   |
| MOD038      | E166                              | 43 | CC1                    | Footnote Modern Methods of Construction <a href="https://www.goconstruct.org/educational-resources/learn-about-construction/modern-methods-of-construction#:~:text=Creating%20paneled%20units%20in%20factories.pre%2Dfabricated%20homes%20use%20timber.">https://www.goconstruct.org/educational-resources/learn-about-construction/modern-methods-of-construction#:~:text=Creating%20paneled%20units%20in%20factories.pre%2Dfabricated%20homes%20use%20timber.</a>   | Included for clarification of policy wording.   |
| MOD039      | Bloor<br>Homes                    | 43 | CC1.1                  | All new development must follow a fabric first approach, aiming to maximise energy efficiency at the outset. Development must then demonstrate how it provides for energy needs by using on-site or local renewable energy sources.   | Removed as duplication of CC2   |
| MOD040      | Bloor<br>Homes                    | 43 | CC1.2                  | All new buildings development should, where practicable and viable:   | Point of clarification  |
| MOD041      | Wappens<br>hall<br>Consortiu<br>m | 44 | CC2.1                  | Where feasible, viable and appropriate having regard to the development requirements on the site, all new development-should will incorporate renewable energy production and storage onsite. unless existing local [] provide power to the site  | Point of clarification to ensure development is provided in an appropriate manner.    |
| MOD042      | E139                              | 46 | CC2 Para<br>6.21       | Achieving the most sustainable outcome without unduly impacting on the viability of development   | Point of clarification on 'most sustainable'.   |
| MOD043      | E173                              | 48 | CC3.b                  | b. Changing the wording to 'heritage assets and their settings'   | Point of clarification to align closer NPPF.  |
| MOD044      | E126                              | 49 | CC4.2                  | The council will require all new residential development to demonstrate that water consumption will not exceed 4100 litres per person per day as per the higher Building Regulations standards.   | Amended to meet suggested recommendations contained within the Water Cycle Study.     |
| MOD045      | E126                              | 50 | Para 6.30              | Local Plan policies requiring new dwellings to meet the optional requirement of 4100 litres/person/day. The Council will be supportive of developments aspiring to achieve a reduction in this target to 90 litres/person/day by 2030, in line with recommendations set in the Council's Water Cycle Study (2024) Footnote <a href="https://www.gov.uk/government/publications/water-stressed-areas-2021-classification">https://www.gov.uk/government/publications/water-stressed-areas-2021-classification</a> .  | Amended per MOD037  |
| MOD046      | E129                              | 50 | New para<br>after 6.31 | There are a range of measures that could be provided through development to ensure the efficient use of, and conservation of, water including, for example; the use of water butts in gardens, permeable surfaces.  | Addition to cross reference elements of cumulative impact assessment recommendations. |

| MOD047      | E126                              | 50    | Para 6.32              | impact on water quality and appropriate mitigation is secured. An assessment to inform the appropriateness of development within designated Source Protection Zones (SPZ's) would be required to demonstrate that any impacts can be mitigated.   | Point of clarification to include requirements regarding SPZs.  |
|-------------|-----------------------------------|-------|------------------------|---|---|
| MOD048      | E126                              | 50    | New para<br>after 6.32 | Development should demonstrate they separate foul and storm drainage and restrict surface water connections to reduce pressures on the waste water network, improve water quality and reduce flood risk.  | Inclusion of text to detail how development should reduce pressures on waste water network, as well as improve water quality and reduce flood risk. |
| MOD049      | E126                              | 50    | New para<br>after 6.32 | Where development has the potential to increase abstraction from groundwater and surface water sources this should not have an adverse impact on the Water Framework Directive. Footnote: <a href="https://www.legislation.gov.uk/uksi/2017/407/contents">https://www.legislation.gov.uk/uksi/2017/407/contents</a> . The Environment Agency provides further technical guidance regarding groundwater protection which should be considered in advance of an application Footnote: <a href="https://www.gov.uk/government/publications/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance">https://www.gov.uk/government/publications/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-protection-technical-guidance/groundwater-g</a> | Further guidance for clarification.   |
| MOD050      | Wappens<br>hall<br>Consortiu<br>m | 50    | CC5.1.b                | The development does not prejudice land needed for flood management, where identified by the Council, now or in the future;   | Removal of text to clarify policy.  |
| MOD051      | E89                               | 51    | CC5.1.d<br>(new)       | d Investigation of the capacity of existing drainage assets serving a site would need to be undertaken to ensure that development will not overload the asset.  | Further guidance for where development will be supported.   |
| MOD052      | E129                              | 51    | CC5.1.i<br>(new)       | i Opportunities to de-culvert or reduce the length of culverts for water courses have been, where possible, explored.   | Addition to cross reference elements of cumulative impact assessment recommendations.   |
| MOD053      | E129                              | 51    | CC5.3 (new)            | Surface Water Drainage Strategies and site Flood Risk Assessments are required for developments within areas of high cumulative flood risk as identified in the SFRA.   | As per modification MOD045  |
| MOD053      | E129                              | 51    | New para<br>after 6.35 | The Strategic Flood Risk Assessment (Level 1 and 2) provides a key evidence base document that developers should refer to when bringing forward proposals for new development. The Level 2 SFRA provides details of when site specific flood risk assessments would be required and developers should use this section to understand requirements for FRAs and what conditions/ guidance documents should be followed. Further to this, Site Summary tables are located within Annex A of the document which developers should use to understand flood risk, access and egress requirements, climate change, SuDS, and FRA requirements for site-specific assessments.  | As per modification MOD045  |
| MOD054      | E122                              | 52    | CC6.1.b                | b. Proposes appropriate mitigation to minimise emissions and air pollution to protect health of the population and the local environment, including wildlife-sites of biodiverse and ecological value.  | Points of clarification.  |
| Green and N | Natural Enviro                    | nment |                        |   |   |
| MOD055      | O22                               | 55    | NE1                    | The Lawton Principles were published in the 'Making space for nature': a review of England's wildlife sites <a href="https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today">https://www.gov.uk/government/news/making-space-for-nature-a-review-of-englands-wildlife-sites-published-today</a>   | Further guidance to explain the meaning of Lawton Principles.   |

| MOD056 | O22            | 57 | Para 7.8  | details can be found in Appendix <b>EF</b>  | Correction   |
|--------|----------------|----|-----------|---|--|
| MOD057 | O22            | 57 | Table 5   | Table 5 Table 4: Categories of biodiversity and geodiversity designations   | Correction   |
| MOD058 | O22            | 57 | Table 5   | 1720 sites (listed in Appendix <b>EF</b> )  | Correction   |
| MOD059 | E139           | 58 | NE2.2     | 2. The council will expect, where relevant, development to:   | Point of clarification   |
| MOD060 | E139           | 58 | NE2.2.a   | any trees, hedgerows, and woodlands within or immediately adjacent to the development site.   | Point of clarification to account for the immediate surrounding area of a site.            |
| MOD061 | O53            | 58 | NE2.3     | Development that would lead to the removal of mature trees and ancient woodland, or, that impacts on any irreplaceable habitats [which the framework confirms includes ancient and veteran trees] will only be supported where wholly exceptional reasons and compensation strategy are provided. Mature specimens of reasonable condition should only be removed where this is necessary to facilitate the effective development of a site and/or the loss is satisfactorily compensated through planting as part of a wider landscaping strategy. In all instances where trees and hedgerow are potentially impacted, applications should be supported by robust arboricultural evidence.                     | Point of clarification for mature trees and inclusion of need for arboricultural evidence. |
| MOD062 | E139           | 58 | NE2.4     | Where relevant The council will secure the delivery of offsite planting via condition and/or planning obligation and will direct offsite planting in line with local priorities   | Point of clarification   |
| MOD063 | Council        | 59 | Para 7.12 | Where tree plantations are managed on a commercial basis  | Further guidance for where loss of trees, hedgerows or woodlands may be supported.         |
| MOD064 | E136           | 59 | NE3.1     | All new development should deliver biodiversity net gains. Major developments should deliver in excess of <b>the statutory requirement</b> a minimum of 10% biodiversity net gain, with an aspiration for 20%, subject to viability.  | Point of clarification to reflect 10% BNG being a statutory requirement.                   |
| MOD065 | Bloor<br>Homes | 59 | NE3.1     | 2. In the first instance, biodiversity net gain should be delivered onsite. Off-site solutions will be supported where it is demonstrated that the mitigation hierarchy of 'avoid, mitigate, compensate' and onsite over offsite solutions have been rigorously applied.  | Split criterion 1 to read more coherently.   |
| MOD066 | Council        | 59 | NE3.3     | Provision should be informed by the emerging Shropshire and Telford & Wrekin Local Nature Recovery Strategy to demonstrate that it is locally appropriate and follow the Lawton Principles of delivering more, bigger, better and joined up habitats.   | Amendment to include Shropshire and Telford & Wrekin Local Recovery Strategy.              |
| MOD067 | O48            | 59 | NE3.5     | All relevant development proposals (as defined in national policy) must be supported by an appropriate biodiversity net gain statement plan, to the national standard, which should include a 30 year habitat management plan. which outlines how it's design has followed the Biodiversity Gain Hierarchy and it expects to deliver and secure its BNG going forward. Biodiversity Gain Plans, Habitat Management & Monitoring Plans and BNG Habitat Monitoring Reports must use current national templates.   | Points of clarification to fall in line with current national guidelines.                  |
| MOD068 | E116           | 60 | Para 7.16 | 7.16 The council is aspiring to achieve 20% BNG for all developments not exempt from statutory BNG, where viable. This is based on research, which will be further set out in a Natural Environment Topic echnical Paper, which has demonstrated that the impact on viability of delivering in excess of 10% BNG is limited as it is the initial statutory 10% which has the biggest design and financial undertaking impact. Given not only the climate but the ecological crisis we are facing, the Council consider it reasonable and appropriate within its Forest Community ethos to aspire to a higher level of BNG provision. Seek 20% BNG where viable on all developments that are not legally exempt. | Points of clarification to reflect Council aspirations and read more coherently.           |

| MOD069     | E129            | 61 | NE4                                  | 5. Greening Factor provision should be appropriate to the site. Relevant development proposals should explain how it benefits their site and the local area using relevant guidance and evidence such as the emerging LNRS, Playing Pitch and Outdoor Recreation Strategy and current climate and green infrastructure mapping.  | Addition to provide further clarity for greening factor provision.  |
|------------|-----------------|----|--------------------------------------|--|---|
| Economy ar | nd Centres      |    |                                      |  |   |
| MOD070     | E142            | 68 | Para 8.11                            | In order to protect the borough supply of employment land, proposals for alternative employment uses   | Removed repetition  |
| MOD071     | E142            | 69 | EC1.d                                | Other uses outside of these criteria will generally not be supported in the SEAs without clear justification to how it would support the function of the SEA.  | Amendment to strengthen policy wording.   |
| MOD072     | E142            | 70 | New para<br>after 8.11               | All new development and proposals for change of use within SEAs must demonstrate that the proposed design, transport implications, and amenity impacts will not cause harm to the strategic function or day-today operation of the SEA both during construction and once operational.  | Further guidance for development and changes of use within Strategic Employment Areas.                        |
| MOD073     | E162            | 70 | New para to follow MOD073            | The north Telford Strategic Employment Area contains MOD Donnington which is a strategic logistics hub for the armed forces therefore any development within the vicinity of the base needs to ensure it does not negatively impact military operation.  | Included to reflect importance of MOD Donnington a strategic employment area.                                 |
| MOD074     | Council         | 70 | EC2                                  | Move policy box to below 8.11  | Reordering of policy for more succinct reading between policies EC1 and EC2.                                  |
| MOD075     | E146            | 70 | Para 8.12<br>amended<br>bullet point | The site has been marketed for a maximum period of 12 months at an appropriate price   | Further guidance for marketing requirements in line with practice adopted within other local authority areas. |
| MOD076     | Council         | 70 | Para 8.12<br>first bullet<br>point   | RICS VALUATION), at a range of tenures and across a range of agents websites   | Point of clarification.   |
| MOD077     | E126            | 73 | EC4                                  | 3. Where development proposals for any other use come forward, proposals will need to clearly demonstrate that there will be no conflict with the operation of the existing waste site. Development proposals on, or within 250m of an existing waste management facility (including installation sites under Environmental Permitting Regulations) will be required to: | Further clarity on requirements for proposals implementing a 250m distance.                                   |
|            |                 |    |                                      | a. assess the potential impact on the facility and demonstrate that it would not unreasonably restrict operation of the facility; and  |   |
|            |                 |    |                                      | b. Provide any necessary mitigation as the "agent of change" to ensure that the operation of the existing business would not have a significant adverse effect on the new development.   |   |
| MOD078     | Council         | 75 | Para 8.30<br>(new)                   | Sites within 800m of Waste water Treatment Works (wwtW) may require an odour assessment depending on the proximity and scale of the works to the development.  | Further clarification for Policy EC4.   |
| MOD079     | Wappens<br>hall | 75 | Para 8.32                            | The hierarchy of retail centres set out Appendix CE,   | Correction  |

|         | Consortiu<br>m                    |    |           |  |  |
|---------|-----------------------------------|----|-----------|--|--|
| MOD080  | E142                              | 77 | EC6.1.a   | Encouraging the diversification of activities and services that complement main town centre uses which fall under those considered Use Class E.  | Point of clarification to specify appropriate use classes that compliment main town centre uses.   |
| MOD081  | E142                              | 77 | EC6.2     | <b>New</b> development <b>requiring planning permission</b> in the Town Centre area, defined on the Policies Map, will be supported where it:  | Point of clarification   |
| MOD082  | E142                              | 77 | EC6.4     | Residential development in Telford Town Centre will be supported where:  a. The proposal is a major, comprehensive development appropriate to the location;  b. The mix and type of units are appropriate to multi-generational town centre living, demonstrating unit mix proposed is required for the development to be viably delivered;  | a) Points of clarification for flexibility to allow development appropriate to the location.     b) Amendment to secure appropriate units for town centre living as well as viable developments. |
| MOD083  | E142                              | 83 | EC9.2.a   | a. The proposal creates a floorspace greater than 500 square metres gross and is located within 500 metres of the boundary of Telford Town Centre, including through amalgamation, subdivision, creation of mezzanine floors and amendments to existing planning conditions; or  | Point of clarification to allow flexibility.   |
| MOD084  | E173                              | 86 | EC11.d    | d. The use of blinds, <b>shutters</b> and canopies are appropriate to the character of the shopfront;  | Addition to reflect that shutters are not acceptable.  |
| Housing |                                   |    |           |  |  |
| MOD085  | Wappens<br>hall<br>Consortiu<br>m | 89 | HO1.1     | 1. To contribute towards meeting the housing requirement, housing site allocations are proposed as set out in Appendix CA and identified on the Local Plan Policies Map. The indicative amount of housing expected to be delivered on each allocated site is set out in Appendix CA  | Correction   |
| MOD086  | Council,<br>135                   | 91 | HO2 (SC1) | The land is to the immediate north of the existing built-up area of Telford, adjacent to the residential settlements to the seuth of the site in both of Bratton and Shawbirch. Site area: approx. 113ha (gross)  Vision  Land within the strategic allocation at Bratton will be developed to deliver a new sustainable community approximately with a minimum of 2,100 dwellings and 2ha of employment land (E Use Class) (gross), phased throughout the plan period. delivered over the plan period. The development of this site will be in accordance with a Design Brief and Masterplan for the whole allocation, which will be prepared following consultation with the public and in liaison with Local Planning Authority. The Design Brief will represent a significant material planning consideration and must be completed and agreed as part of the pre-application process for development of the site. It must factor in the following strategic requirements for this site.  The dwellings will must-provide a range of multi-generational living accommodation that includes accommodation for the elderly, supported and specialist provision and accessible housing that meets the identified needs of the borough.  At the heart of the community, the site will provide a mixed local centre comprising a range of shops and services to include community, leisure and recreation facilities. The delivery of these should be agreed with the Local Planning Authority. | Further clarification of points in policy provided,  |

The site will provide an active and sustainable travel network, leading-including a mobility hub provided within the local centre. This hub should provide enable delivery of a number of facilities such as enhanced bus services, EV car charging, car hire parking, and parcel box lockers, as well as walking and cycling facilities.

In line with Policy S6 the Council are looking to create sustainable communities that are improving the health and wellbeing of residents. A network of formal and informal public open and recreation spaces will be provided in line with the Council's Playing Pitch and Outdoor Recreation Strategy and the Play Strategy.

The site must also provide extensions to the boroughs existing green network.

The sustainable community must provide Provision of one primary schools, comprising of three forms of entry and nursery provision, unless otherwise agreed with the Local Planning Authority. The delivery of the primary school should be delivered at a stage to an

agreed plan with the Local Planning Authority in line with projected housing delivery rates.

Delivery

A development brief Any application on the site will be required to coordinate uses across the site, that is based on effective community engagement and reflect local aspirations. The brief mustshall consider the environmental, social, design, and economic objectives as they seek to create a new community. This will allow for the all elements of the proposal to be considered comprehensively in order to promote an integrated development as far as is practical. The brief shall be agreed with the Local Planning Authority prior to consideration of any detailed matters.

Phasing plans should be considered prior to submission as part of the Design Brief process. Any subsequent application should be supported by a phasing plan and delivery trajectory.

The site must provide the following details to allow for an efficient and comprehensive delivery of the **sustainable community** site:

- Contributions to the provision of a secondary school within allocated site SC3, en a separate site at SC3 as identified in the infrastructure Delivery Plan, this should include land and build costs.
- Delivery of highway and transport infrastructure to an agreed phasing plan to allow for highways adoption as soon as possible.
- Where appropriate, landscape buffers should be included to protect existing communities
- Delivery of education infrastructure to an agreed education infrastructure phasing plan.
- Delivery of on-site and off-site utilities infrastructure to a phasing plan approved by all utility undertakers.
- The proposal needs to incorporate recommendations from the Level 2 Strategic Flood Risk Assessment outcomes for this site.
- The site contains a Grade II listed building. A Heritage Impact Assessment including assessment of the impact on the adjacent Grade II Listed Building. Required mitigation such as landscape buffers and screening should be

|        |          |    |           | implemented. which benefits from a rural/open countryside setting. Buffers and                     |   |
|--------|----------|----|-----------|--|---|
|        |          |    |           | screening should be incorporated to minimise effects of development.                               |   |
|        |          |    |           | <ul> <li>A comprehensive Green Infrastructure strategy which should incorporate ing-the</li> </ul> |   |
|        |          |    |           | Council's vision for a forest community (reference to where defined to be added)                   |   |
|        |          |    |           | and include details of including:  |   |
|        |          |    |           | <ul> <li>Existing woodland, trees and hedgerows;</li> </ul>  |   |
|        |          |    |           | <ul> <li>Proposed structural landscaping and public open space, including extension</li> </ul>     |   |
|        |          |    |           | of the borough's Green Network; and  |   |
|        |          |    |           | — Extension of Green Network;  |   |
|        |          |    |           | - Connection to the Silkin Way   |   |
|        |          |    |           | - Footpath (includes public rights of way) and cycleway connections into and                       |   |
|        |          |    |           | around the site, including connection to the Silkin Way.   |   |
|        |          |    |           | - Identified areas of existing woodland and new planting   |   |
|        |          |    |           | In line with Policy S7 the Council will seek developer contributions to support the                |   |
|        |          |    |           | delivery of offsite infrastructure associated with the sustainable communities.                    |   |
|        |          |    |           | Delivery of play, recreation and outdoors sports infrastructure on site in line with               |   |
|        |          |    |           | Councils adopted Playing Pitch and Outdoor Recreation strategy (1), using Sport                    |   |
|        |          |    |           | Englands Pitch Calculator. Offsite provision or contributions to offsite provision may             |   |
|        |          |    |           | be required to meet needs identified.  |   |
|        |          |    |           | Inc a footnote(1) the emerging Playing Pitch and Outdoor Recreation Strategy due                   |   |
|        |          |    |           | Autumn 2025.   |   |
|        |          |    |           | This policy needs to be read alongside all relevant other policies within the Local Plan.          |   |
| MOD087 | Council, | 94 | HO2 (SC2) | The land is to the immediate north-east of the built-up area of Telford. Muxton and The            | Further clarification of points in policy provided, |
|        | 161      |    |           | Humbers borders the site to the south and west of the boundary.                                    |   |
|        |          |    |           | Site Area: approx. 182ha (gross)   |   |
|        |          |    |           | <u>Vision</u>  |   |
|        |          |    |           | Land within the strategic allocation at Muxton will be developed to deliver a new sustainable      |   |
|        |          |    |           | community approximately with a minimum of 2,700 dwellings with 2,305 of those to be                |   |
|        |          |    |           | delivered in the plan period.  |   |
|        |          |    |           | The development of this site will be in accordance with a Design Brief and Masterplan              |   |
|        |          |    |           | for the whole allocation, which will be prepared following consultation with the public            |   |
|        |          |    |           | and in liaison with Local Planning Authority. The Design Brief will represent a                    |   |
|        |          |    |           | significant material planning consideration and must be completed and agreed as                    |   |
|        |          |    |           | part of the pre-application process for development of the site. It must factor in the             |   |
|        |          |    |           | following strategic requirements for this site.  |   |
|        |          |    |           | The site will also provide 5.6ha of employment land (gross), phased throughout the plan            |   |
|        |          |    |           | <del>period.</del> delivered over the plan period.   |   |
|        |          |    |           | The dwellings will must provide a range of multi-generational living accommodation that            |   |
|        |          |    |           | includes accommodation for the elderly, supported and specialist provision and accessible          |   |
|        |          |    |           | housing the meets the identified needs of the borough.   |   |
|        |          |    |           | At the heart of the community, the site will provide two mixed local centres comprising a          |   |
|        |          |    |           | range of shops and services to include community, leisure and recreation facilities. The           |   |
|        |          |    |           | delivery of these should be agreed with the Local Planning Authority.                              |   |

The site will provide an active and sustainable travel network, leading including a mobility hubs provided within the local centres. Thisese hubs should provide enable delivery of a number of facilities such as enhanced bus services, **EV car charging, car hire parking**, and parcel box lockers, as well as walking and cycling facilities.

In line with Policy S6 the Council are looking to create sustainable communities that are improving the health and wellbeing of residents. A network of formal and informal public open space, recreation spaces and playing fields will be provided in line with the Council's Playing Pitch and Outdoor Recreation Strategy and the Play Strategy.

The site must also provide extensions to the boroughs existing green network.

The sustainable community must provide Provision of two primary schools, both comprising of two form entry and nursery provision, unless otherwise agreed with the Local Planning Authority. The delivery of the primary schools should be delivered at a stage to an agreed plan-with the Local Planning Authority in line with projected housing delivery rates.

Delivery

A development brief Any application on the site will be required to coordinate uses across the site, that is based on effective community engagement and reflect local aspirations. The brief mustshall consider the environmental, social, design, and economic objectives as they seek to create a new community. This will allow for the all elements of the proposal to be considered comprehensively in order to promote an integrated development as far as is practical. The brief shall be agreed with the Local Planning Authority prior to consideration of any detailed matters.

Phasing plans should be considered prior to submission as part of the Design Brief process. Any subsequent application should be supported by a phasing plan and delivery trajectory.

The site must provide the following details to allow for an efficient and comprehensive delivery of the **sustainable community** site:

- Contributions to the provision of a secondary school within allocated site SC3, en a separate site at SC3 as identified in the Infrastructure Delivery Plan, this should include land and build costs.
- Delivery of highway and transport infrastructure to an agreed phasing plan to allow for highways adoption as soon as possible.
- Vehicular access will not be permitted from Wellington Road either during construction or after completion of the sustainable community.
- Where appropriate, landscape buffers should be included to protect existing communities
- Delivery of education infrastructure to an agreed education infrastructure phasing plan.
- Delivery of on-site and off-site utilities infrastructure to a phasing plan approved by all utility undertakers.
- The proposal needs to incorporate recommendations from the Level 2 Strategic Flood Risk Assessment outcomes for this site.

|        |                 |    |           | <ul> <li>A comprehensive Green Infrastructure strategy which should incorporate ing the<br/>Council's vision for a forest community (reference to where defined to be added)<br/>and include details of including</li> </ul>  |   |
|--------|-----------------|----|-----------|---|---|
|        |                 |    |           | <ul> <li>Existing woodland, trees and hedgerows;</li> <li>Proposed structural landscaping and public open space, including extension of the borough's Green Network; and</li> </ul>   |   |
|        |                 |    |           | - Extension of Green Network; - Connection to the Silkin Way  |   |
|        |                 |    |           | Footpath (includes public rights of way) and cycleway connections into and around the site.   |   |
|        |                 |    |           | <ul> <li>Identified areas of existing woodland and new planting</li> <li>In line with Policy S7 the Council will seek developer contributions to support the</li> </ul>   |   |
|        |                 |    |           | delivery of offsite infrastructure associated with the sustainable communities.  Delivery of play, recreation and outdoors sports infrastructure on site in line with   |   |
|        |                 |    |           | Councils adopted Playing Pitch and Outdoor Recreation strategy, using Sport Englands Pitch Calculator. Offsite provision or contributions to offsite provision may be required to meet needs identified.  |   |
|        |                 |    |           | This policy needs to be read alongside all relevant other policies within the local plan.   |   |
| MOD088 | Council,<br>149 | 97 | HO2 (SC3) | The land is to the immediate north of the built-up area of Telford. The land sits adjacent to predominantly commercial developments to the east, and residential development to the south and west of Queensway (A442). To the north, and north-east lie the settlements of Horton, Preston upon the Weald Moors, Wappenshall Junction, and Eyton upon the Weald Moors. | Further clarification of points in policy provided, |
|        |                 |    |           | Site Area: approx. 274.1ha (gross) <u>Vision for the site</u>   |   |
|        |                 |    |           | The Site Land within the strategic allocation at Land North of A442 Wheat Leasows will be developed to deliver a new sustainable community approximately with a minimum of 3,100 dwellings with a minimum of 2,190 of these to be delivered in the Plan period. The Site will   |   |
|        |                 |    |           | also provide approximately 68ha of employment land (gross) which includes 22ha of an existing employment allocation, E28 at Shawbirch. The employment land will be phased   |   |
|        |                 |    |           | throughout the plan period. will be delivered over the plan period.  The development of this site will be in accordance with a Design Brief and Masterplan  |   |
|        |                 |    |           | for the whole allocation, which will be prepared following consultation with the public and in liaison with Local Planning Authority. The Design Brief will represent a   |   |
|        |                 |    |           | significant material planning consideration and must be completed and agreed as part of the pre-application process for development of the site. It must factor in the  |   |
|        |                 |    |           | following strategic requirements for this site.  The dwellings will must provide a range of multi-generational living accommodation that includes accommodation for the elderly, supported and specialist provision and accessible  |   |
|        |                 |    |           | housing that meets the identified needs in the borough.  At the heart of the community, the site will provide two mixed local centres comprising a  |   |
|        |                 |    |           | range of shops and services to include community, leisure and recreation facilities. The delivery of these should be agreed with the Local Planning Authority   |   |

The site will provide an active and sustainable travel network, leading a including mobility hubs provided within the local centres. Thisese hubs should provide enable delivery of a number of facilities such as enhanced bus services, EV car charging, car hire parking, and parcel box lockers, as well as walking and cycling facilities.

In line with Policy S6 the Council are looking to create sustainable communities that are improving the health and wellbeing of residents. A network of formal and informal public open and recreation spaces will be provided. in line with the Council's Playing Pitch and Outdoor Recreation Strategy and the Play Strategy.

The site must also provide extensions to the boroughs existing green network.

There is potential for tourism activity related to the restoration of the Shrewsbury and Newport Canal at Wappenshall Wharf, the alignment of which is recognised under Policy Cl4

The sustainable community must provide Provision of two primary schools, both comprising of two form entry and nursery provision, unless otherwise agreed with the Local Planning Authority. The delivery of the primary schools should be delivered at a stage to an agreed plan-with the Local Planning Authority in line with projected housing delivery rates. Land for to deliver a Secondary School will also be provided on site to serve the needs of this and the other allocated sustainable communities (SC1 and SC2), with an appropriate mechanism in place within a Section 106 Agreement to compensate for provision of land and build cost over.

### Delivery

A development brief Any application on the site will be required to coordinate uses across the site, that is based on effective community engagement and reflect local aspirations. The brief mustshall consider the environmental, social, design, and economic objectives as they seek to create a new community. This will allow for the all elements of the proposal to be considered comprehensively in order to promote an integrated development as far as is practical. The brief shall be agreed with the Local Planning Authority prior to consideration of any detailed matters.

Phasing plans should be considered prior to submission as part of the Design Brief process. Any subsequent application should be supported by a phasing plan and delivery trajectory.

The site must provide the following details to allow for an efficient and comprehensive delivery of the **sustainable community** site:

Delivery of highway and transport infrastructure to an agreed phasing plan to allow for highways adoption as soon as possible.

Delivery of on-site and off-site utilities infrastructure to a phasing plan approved by all utility undertakers.

The proposal needs to incorporate:

- The proposal needs to incorporate recommendations from the Level 2 Strategic Flood Risk Assessment outcomes for this site.
- Maintenance Retain the functionality of the Northern Interceptor Channel as a strategic drainage asset.
- Provide a comprehensive Green Infrastructure strategy incorporating the

| MOD089 | E70            | 100 | HO3.4     | Council's vision for a forest community (reference to where defined to be added) and include details of including:  Existing woodland, trees and hedgerows;  Proposed structural landscaping and public open space, including extension of the borough's Green Network; and  Extension of Green Network  Connection to the Silkin Way and Apley Woods  Footpath (includes public rights of way) and cycleway connections into and around the site, including connection to the Silkin Way and Apley Woods  Identified areas of existing woodland and new planting  A green buffer area to protect the visual character of the village of Eyton Upon the Weald Moors from areas of built development within the Sustainable Communities site.  In line with Policy S7 the Council will seek developer contributions to support the delivery of offsite infrastructure associated with the sustainable communities.  Delivery of play, recreation and outdoors sports infrastructure on site in line with Councils adopted Playing Pitch and Outdoor Recreation strategy, using Sport Englands Pitch Calculator. Offsite provision or contributions to offsite provision may be required to meet needs identified.  This policy needs to be read alongside all relevant other policies within the Local Plan  4. In exceptional certain circumstances, where it can be demonstrated that the creation of private amenity space is not possible due to land that availability and/or property constraints. of land is not available to sparse and the site is constrained due to viability, subject to the level and quality of amenity space provided in this form. Alternative outdoor spaces such as useable-balconies and roof gardens would be acceptable in lieu of ground floor outdoor amenity space, where it is practicable to provide them. | Points of clarification to improve readability and interpretation of policy.  |
|--------|----------------|-----|-----------|---|---|
| MOD090 | E70            | 103 | Para 9.24 | refer to the councils latest guidance. Footnote: <a href="https://www.telford.gov.uk/planning-and-building-control/planning-applications-and-advice-appeals-enforcement-and-guidance/planning-application-process/">https://www.telford.gov.uk/planning-and-advice-appeals-enforcement-and-guidance/planning-application-process/</a>   | Inclusion to direct the reader to Councils' guidance.   |
| MOD091 | E70            | 103 | Para 9.26 | The Council support the most efficient use of land and property. Therefore in certain circumstances, for example a change of use to create residential accommodation above existing retail units, it may not be possible to create a private outdoor amenity space. These proposals will be assessed on a case by case basis.   | Further explanation provided context to HO3 criterion 4.  |
| MOD092 | Council        | 104 | HO4. 2    | 2. Affordable housing secured through section 106 obligations is a priority, however where it can be demonstrated that this cannot be achieved other sources of supply will be considered appropriate in order to meet the thresholds set out in policy.  | Point of clarification on Council's priority, also point of clarification for where first part of criteria cannot be met. |
| MOD093 | O54            | 104 | HO4       | 9.34Council's Economic and Housing needs Assessment Part 1 (18). The built up area of Telford includes all three Sustainable Community sites. In order to justify   | Point of clarification  |
| MOD094 | E141           | 106 | HO5.1.b   | b. Affordable housing being sensitively integrated across the site in, where possible, small  | Point of clarification  |
| MODOS  | D.             | 400 | 1105.0    | manageable clusters, including each phase of large sites.   |   |
| MOD095 | Bloor<br>Homes | 106 | HO5.2     | 2. Affordable housing provided under Part 1 of this policy (either on or off site) will be secured through a planning obligation.   | Point of clarification  |

| MOD096 | Council             | 112 | HO8                    | The council have identified provision of two permanent pitch sites. a. Lawley Furnaces expansion to accommodate a further 3 pitches. b. Lodge Road to accommodate at least 13 pitches.   | Correction to reflect latest Council position.   |
|--------|---------------------|-----|------------------------|--|--|
| MOD097 | E104                | 113 | Para 9.76              | Proposals for new traveller sites are supported where they help meet any unmet need for sites as identified in the GTTSAA 20243 update or any subsequent update. Where the council's identified need for sites has already been met, new windfall sites will only be permitted where the applicant can provide appropriate justification showing there is a need for the accommodation site and the application complies with the criteria in Policy HO8. This should include an explanation as to why existing or planned sites would not meet the applicant's needs, and the site complies with the criteria in Policy HO 8. | Correction and amendments to tighten policy.   |
| MOD098 | Council             | 114 | HO9                    | a. They are supported by a masterplan and Design Code/Brief document which demonstrates:   | Correction   |
| MOD099 | E128                | 114 | HO9 New point f        | f. Proposals should be in line with Policy S6 to help address the health and wellbeing of residents as part of any estate regeneration proposals, in order to create healthy strong communities.   | Additional criterion to link to Policy S6 consistent with other criterions in policy.  |
| MOD100 | Council             | 115 | HO10.b                 | The joint production of a realistic site Development Brief for   | Addition to read coherently.   |
| MOD101 | E166                | 117 | HO11.2                 | Application sites delivering 100+ new dwellings should provide at least 53% of the housing as self-build or custom housebuilding serviced plots.   | Correction   |
| MOD102 | Lioncourt<br>Homes  | 117 | HO11.4                 | Developers will be required to actively market plots at <b>a</b> reasonable price <b>that reflects a professional valuation</b> , until the buyer is found or for a minimum of 6 months.   | Addition to reflect a professional valuation.  |
| MOD103 | Telford &<br>Wrekin | 118 | New para<br>after 9.99 | A professional valuation should be carried out by a Royal Institute of Charted Surveyors (RICS) valuer or other appropriate competent professional.  | Clarification to demonstrate who should undertake a professional valuation, expanding on amendment to Policy HO11.4.   |
| MOD104 | E129                | 118 | HO12                   | New Housing in Rural Areas  1. Text etc Infill Development d. Text etc Replacement Dwellings 3Text etc Conversions and Change of Use 4Text etc Rural Workers 5Text etc   | Inclusion of sub headings for policy to read more coherently.  |
| MOD105 | O56                 | 118 | HO12.1.a               | a. Directing <del>most</del> new rural housing to sites with unimplemented planning permission;  | Point of clarification   |
| MOD106 | Council             | 119 | HO12.1.c               | c. Supporting a limited amount of housing development within or immediately adjoining the built confines of Key Settlements, so not to result in isolated rural dwellings within these areas.  | Point of clarification to account for housing development immediately adjoin a key settlement as well as further explanation to clarify that housing development would not result in isolated locations. |

| MOD107     | E121                              | 119 | HO12.1.d                | d. Supporting sustainable infill development   | Point of clarification   |
|------------|-----------------------------------|-----|-------------------------|--|--|
| MOD108     | Council                           | 119 | HO12.4.c                | The replacement dwelling is <b>sympathetic to the size</b> , <b>mass</b> , <b>character and appearance of the original building and</b> assimilates into the surrounding context taking into account the existing street scene   | Point of clarification for replacement dwellings.  |
| MOD109     | Council                           | 122 | Para 9.118              | Affordable rural exception sites should be well-designed and proportionate in scale and design to the location and to meet current and future needs. Proposals should meet the internal space standards in Policy HO3 will not normally be permitted to exceed 100 square metre gross internal floor space, and the dwelling size will be controlled to ensure it remains affordable in relation to local incomes.   | Point of clarification to specify sqm of development that would not normally be permitted. |
| Developmen |                                   | 1   |                         |  |  |
| MOD110     | Council                           | 125 | DD1.1                   | Tohe ensure good   | Correction   |
| MOD111     | Bloor<br>Homes                    | 125 | DD1                     | Remove and from end of policy  | Correction   |
| MOD112     | E128                              | 126 | Para 10.12              | Other sources of information such as the National Design Guide and Code provide good starting points for design nationally, whilst other forms of guidance such as the West Midlands Design Charter provides a regional base for design through its 6 themes and 12 principles. Sport England's Active Design and Design Coding Guidance also provides a useful tool to help shape developments at an early stage.  Footnote: Active Design   Sport England      | Inclusion of Sports England guidance as a useful tool for developments at an early stage.  |
| MOD113     | Council                           | 126 | New para<br>after 10.12 | In the local area there are two strategic MOD sites located in and adjacent to Telford including MOD Donnington and RAF Shawbury. Applications for development should not compromise, restrict or otherwise degrade the operational capability of MOD sites and/or assets. The MOD should be consulted on development proposals for noise sensitive development where the existing noise source is related to defence activities.                                | Addition to highlight two strategic MOD sites in the context of Policy DD1.                |
| MOD114     | Council                           | 127 | DD2                     | Design codes / briefs will need to be submitted, for estate Developments (requirements for Sustainable Communities are set out in Policy HO2), as part of the application process with the detail being proportionate to the size of development.  | Remove reference to code to provide clarity.   |
| MOD115     | E128                              | 128 | Para 10.17              | After 10.17 (new para) – Where new development is proposed this should be in line with NPPF paragraph 200 and not unduly impact existing uses such as places of worship, pubs, music venues, sports clubs, waste facilities and utilities sites. Where evidence demonstrates that there is a potential conflict between uses, for example the risk of ball strike from an existing sports ground, the applicant will be required to provide suitable mitigation. | Further guidance to reflect needs in NPPF.   |
|            | Travel and T                      |     |                         |  |  |
| MOD116     | E110                              | 138 | ST1.c                   | The use of Dementia friendly design principles   | Point of clarification   |
| MOD117     | Wappens<br>hall<br>Consortiu<br>m | 138 | ST1.2                   | Where a development is served by is in close proximity to one of the borough's rail and bus stations,  | Point of clarification   |

| MOD118    | Council        | 139      | Para 11.10              | employment and leisure activities. Where sites are in close proximity of a borough town bus station and/or railway station (800m and 1km respectively), Part 2 of the policy will apply.  | Point of clarification to outline what constitutes close proximity.   |
|-----------|----------------|----------|-------------------------|---|---|
| MOD119    | Bloor<br>Homes | 141      | ST3                     | 11.17 <b>The Infrastructure Delivery Plan (IDP)</b> and the Local Transport Strategy will set out the strategic impact of site allocations on the transport system and assesses alternative ways of <b>mitigation</b> of mitigating their cumulative impacts.   | Inclusion to reflect Infrastructure Delivery Plan and slight alteration to wording.   |
| Community | Infrastructur  | e, Cultu | re and Open S           |   |   |
| MOD120    | E114           | 149      | CI1                     | <ul> <li>4. The council will not support the loss or reduction of land or buildings currently or last used as a community facility (excluding sports and leisure facilities which is covered under Policy CI2) unless:</li> <li>d. A lack of need is demonstrated (through a 12 month period of marketing); or</li> <li>e. Acceptable alternative provision exists or is proposed concurrently to maintain the community's ability to meet its day-to-day needs; or</li> <li>f. Where healthcare facilities are declared surplus or identified as part of an estates strategy or service transformation plan where it can be demonstrated within a 12 month period that investment is needed towards modern, fit for purpose infrastructure and facilities, the requirements under Points (d) or (e) will not apply.</li> </ul>   | Additional criterion for circumstances where it is demonstrated investment is needed for infrastructure, providing a link to criterions (d) and (e) |
| MOD121    | E114           | 150      | Para 12.10              | Where the loss of a community facility is proposed the applicant should either provide:  • Evidence of a lack of need through a 12 month period of marketing (through local and national agents and channels) which demonstrates engagement with the community and likely stakeholders to sustain the facility and to find an appropriate alternative community use, at a value reflecting existing use and condition; or  • Demonstrate that acceptable alternative provision exists or is proposed in the local area and is accessible to people.  The Council recognise that there may be circumstances where the early release of land and/ or property would support investment into healthcare facilities   | Further clarity to bullet points as well as additional text to recognise early release of land  |
| MOD122    | Council        | 150      | New para<br>after 12.10 | All major development proposals will be expected to contribute to the provision of infrastructure, services, and facilities necessary to support sustainable development. Contributions will be secured, for community infrastructure, through planning obligations (Section 106 agreements), where site-specific mitigation is required. In the absence of Supplementary Planning Documents (SPDs), the Council will determine the nature and scale of contributions based on National and Local guidance, that identify infrastructure needs and thresholds, guidance including the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG),the Local Plan, the Infrastructure Delivery Plan (IDP), and viability assessments submitted by developers to ensure deliverability. In the instance of Play, Sport, Recreation and indoor sports contributions may be sought using the Councils Play Recreation and Open Space, Sport England's Playing Pitch calculators and Sport England's sports facilities calculator tool. | Additional text to clarify contributions from major developments.   |

| MOD123       | Council | 151<br>and<br>153 | Para 12.14<br>and 12.22 | Change any reference to PPS (Playing pitch strategy) to Playing Pitch and Outdoor Recreation Strategy  | Correction to reflect update.  |
|--------------|---------|-------------------|-------------------------|--|--|
| MOD124       | E128    | 152               | Para 12.19              | for open space on development sites. This is supported by Policy S7 for developer contributions.   | Point of clarification to link text to Policy S7.  |
| MOD125       | E128    | 152               | Cl3                     | Play, Recreation and Open Space – Developer Contributions Strategy (2022), the Playing Pitch and Outdoor Recreation Strategy (20225),  | Correction   |
| MOD126       | E128    | 153               | Para 12.21              | with Sport England technical standards and technical guidance from National Governing Bodies for Sport.  | To reflect further technical guidance.   |
| MOD127       | E128    | 153               | Para 12.24              | 12.24 The council considers, for the purpose of securing on and offsite infrastructure, the use of child bed spaces in the calculation of requirements for play provision to be the most accurate measure of need. The Council also use the Play, Recreation and Open Space strategy, Sport England's Playing Pitch Calculator tool as well as latest available Council guidance to secure in on and offsite infrastructure provision.   | Clarification on securing infrastructure both on and off site as well as further clarification as to what guidance is used to secure infrastructure provision. |
| MOD128       | E153    | 153               | Para 12.29              | the council will work with developers (at full or reserved matters) to agree appropriate   | Point of clarification   |
| MOD129       | E121    | 154               | Cl4.1                   | The council will support development for new cultural, tourism and leisure (indoor and outdoor) activities (including ancillary development associated with these uses) and improvements to existing facilities where:  a. They are located in an accessible location within or adjacent to the borough's hierarchy of centres,;  b. They include high quality design and public realm;  c. They are well connected via travel plans to secure links to walking and wheeling routes, electric vehicle charging infrastructure at destinations, public transport services, parking and visitor wayfinding; and  d. They encourage investment to improve the quality of the infrastructure for arts, sports, museums and leisure and provide opportunity for the creative economy to prosper.  2. Consideration will also be given to enhancing unique venues and the creation of new outdoor venues and activity centres near to key tourist destinations.  3. Elsewhere in the borough, the Council will support leisure (indoor and outdoor), cultural, and tourism facilities (including ancillary development associated with these uses) provided it can be demonstrated that they cannot be accommodated in the borough's centres or have a specific locational requirement, as well as complying with 1(b) and 1(c) above. | Points of clarification.   |
| MOD130       | O59     | 155               | Para 12.34              | delivered through the provision of bed and breakfast and guest house accommodation, self-catering, camping, <b>glamping</b> and caravanning.   | Amendment to include reference to glamping.  |
| Historic Env | ronment |                   |                         | <u> </u>   | ·  |
| MOD131       | E173    | 159               | Para 13.1               | This includes a World Heritage Site, listed buildings, seven conservation areas, scheduled monuments, historic registered parks and gardens, historic settlements  | Correction   |
| MOD132       | E173    | 160               | Para 13.4               | These include both designated heritage assets (listed buildings) and non-designated heritage assets that include buildings of local interest identified by the Local Planning Authority (including local listing).   | Point of clarification that designated assets refers to listed buildings and slight reordering of wording to introduce local interest sooner.                  |
| MOD133       | E173    | 160               | Para 13.4               | Registered Parks and Gardens   | Correction   |

| MOD134 | E173 | 160 | HE1.3             |  | To align with requirements within the NPPF.   |
|--------|------|-----|-------------------|--|---|
|        |      |     |                   | Any harm or loss to the significance of or to the setting of a heritage asset must be <b>avoided in</b> the first instance. Any harm should be wholly exceptional and require clear justification.   |   |
| MOD135 | E173 | 160 | HE1.5             | Proposals must take account the existing <b>historic</b> landscape and the impact on existing habitats and species in line with Policy NE1 <b>and NE6</b> .  | Points of clarification.  |
| MOD136 | E173 | 160 | HE1.6             | The Council will support proposals for microgeneration where it can be evidenced that this does not result in harm to an historic asset or negatively impacts the surrounding character and setting of heritage assets.  | Point of clarification to include impact on setting.  |
| MOD137 | E173 | 160 | HE1.7.d           | The harm or loss to it <b>is</b> outweighed  | Correction  |
| MOD138 | E173 | 161 | HE1.7.e<br>(new)  | e. It can be demonstrated that planning permission has been secured for a viable future use.   | Additional criterion to secure viable future use of asset.  |
| MOD139 | E173 | 161 | Para 13.10        | This is to ensure that proposals are based on an understanding of the significance of any heritage assets that may be affected. A Heritage Assessment is therefore required for any development proposals which are likely to affect the significance of a heritage asset, including its setting. The level of detail provided in a Heritage Assessment should be in proportion to the significance of the heritage asset and the scale of any impacts upon it. For assets with archaeological interest this may include a desk-based assessment and where necessary, a field evaluation carried out by an appropriate professional. Such assessments should be carried out well in advance and must be submitted with the planning application. | Further guidance outlining when a heritage assessment will be required and the level of detail required.  |
| MOD140 | E173 | 161 | Para 13.10        | including the Ironbridge Gorge World Heritage Site Supplementary Planning Document (Footnote: Ironbridge Gorge World Heritage Site SPD), the Ironbridge Gorge World Heritage Site Management Plan and Landscape Appraisals.  | Inclusion of further guidance documents relevant to ensuring proposals are based on an understanding of the significance of any heritage assets and how they are reflected. |
| MOD141 | E173 | 162 | Para 13.11        | Role as the birthplace of the industrial revolution within the landscape of the Severn Valley. The significance of the World Heritage Site is described in a Statement of Outstanding Universal Value adopted by UNESCO's World Heritage Committee in 2013. The inscription of the World Heritage Site was justified under three of the criteria set out under Paragraph 77 of UNESCO's Operational Guidelines for the Implementation of the World Heritage Convention   | Further guidance to reflect significance of the Ironbridge Gorge World Heritage Site.   |
| MOD142 | E173 | 162 | HE2.3             | on the archaeological remains of sites   | Point of clarification  |
| MOD143 | E173 | 162 | HE2.4 a.<br>(new) | a. The significance of the World Heritage Site and its Outstanding Universal Value including the authenticity and integrity of its attributes;   | Further criterion highlighting OUV of World Heritage Site.  |
| MOD144 | E173 | 162 | HE2.7             | World Heritage Site applicants are encouraged to liaise with Historic England at the earliest opportunity.   | Point of clarification to make sure applicants liaise with Historic England.  |
| MOD145 | E173 | 163 | Para 13.13        | (Severn Gorge Conservation Area) that was originally designated in 1971 and extended in 1980. There is an Article 4(2) Direction designated in 1998 that restricts permitted development rights across the whole site to preserve the visual quality of the streetscape, meaning that planning permission may be needed for certain works. The Article   | Points of clarification on designation dates as well as Article 4(2) Direction controls.  |

|             |         |                 |                         | 4(2) Direction controls minor works including most alterations to houses, to <b>gardens visible</b> from the public realm and  |   |
|-------------|---------|-----------------|-------------------------|--|---|
| MOD146      | E173    | 163             | Para 13.15              | Policy <b>EC11</b> (shopfront and advertisement design), as well as the Conservation Area Management Plan and Ironbridge World Heritage Site Management Plan.  | Correction and inclusion of Ironbridge Gorge World Heritage Site Management Plan. |
| MOD147      | E173    | 163             | Para 13.16              | Historic England, ICOMOS- <b>UK</b> , and local partners including the Ironbridge Gorge Museum Trust <b>s</b> o that all appropriate measures are taken in the custodianship of the World Heritage Site. Where significant potential harm is identified as part of proposals early discussions with <b>Historic England are recommended about whether the proposals may require notification under Paragraph 172 of UNESCO's Operational Guidelines.</b>   | Correction and clarification on early discussions with Historic England.          |
| MOD148      | E173    | 167             | New para<br>after 13.30 | The Council has prepared a number of detailed conservation area appraisals which set out what the special characteristics of each area are that justify its designation and also identify aspects of the area where enhancement is sought. There are also a number of Management plans (footnote: Conservation Area Management Plans <a href="https://www.telford.gov.uk/planning-and-building-control/listed-buildings-conservation-areas-and-heritage-assets/conservation-areas/">https://www.telford.gov.uk/planning-and-building-control/listed-buildings-conservation-areas-and-heritage-assets/conservation-areas/</a> ) setting out how the Council plan to approach the future development of each area. | Further guidance on Conservation Area Appraisals prepared by the Council.         |
| MOD149      | E173    | 168             | Subheading              | Registered parks and gardens   | Correction  |
| MOD150      | E173    | 168             | Para 13.37              | The <b>record</b> of <b>registered</b> parks and gardens includes, gardens, grounds and other planning landscapes and open spaces. The register focuses on the <b>significance</b> of the designed landscape, rather than on planting or botanical species.  | Points of clarification   |
| MOD151      | E173    | 168             | Para 13.38              | protection of Registered Parks and Gardens.  | Correction  |
| MOD152      | E173    |                 | HE6.1                   | council will resist development that would harm the significance or be detrimental to the setting, character, quality and historic integrity of Registered Parks and Gardens and make sure their associated features and settings are preserved and enhanced. The council will:  | To align with NPPF.   |
| MOD153      | E173    | 169             | HE6.1.e                 | impacts Registered Parks   | Correction  |
| MOD154      | E173    | 169             | Para 13.41              | and started in Ancient Monuments Act 1882 and subsequently superseded by the Ancient Monuments and Archaeological Areas Act 1979.  | Point of clarification on relevant Acts.  |
| MOD155      | E173    | 169             | HE7.3.b                 | for <b>appropriate mitigation</b> its recording and/or excavation by a competent archaeological organisation before development starts on site and any information which requires recording shall be recorded in a suitable format and deposited on the council's Historic Environment Record <b>(HER).</b>  | Point of clarification and inclusion of abbreviation.                             |
| Mineral and | Land    |                 |                         |  |   |
| MOD156      | Council | 173<br>-<br>175 | ML1 and<br>ML2          | Amend Policy ER6 references within chapter to ML3 as well i) to v) to a) to e)   | Correction  |
| MOD157      | E104    | 173             | ML1.1.a                 | The development cannot <b>reasonably</b> be sited or relocated to avoid mineral areas  | Point of clarification  |
| MOD158      | O53     | 173             | ML1.1.f                 | f) Sites have been allocated for development in the Local Plan.  | Inclusion of site allocations as an omission from criterion 1.                    |

| MOD159 | Council | 174 | Para<br>Between<br>14.9 and<br>14.10 (new) | The Council recognise that to meet the Government housing targets, housing allocations must be brought forward in a timely manner. Therefore, sites allocated in this Local Plan are therefore exempt from the requirement for prior extraction.  Prior extraction on allocated development sites would only be supported where it does not impact on the housing delivery trajectory of the site.   | Further guidance on prior extraction and its relevance to site allocations within the Local Plan. |
|--------|---------|-----|--|--|---|
| MOD160 | O35     | 175 | ML2  | The council will only support proposals for crushed rock   | Point of clarification  |
| MOD161 | Council | 175 | Para 14.15                                 | The latest available supply position is set out in the Shropshire and Telford and Wrekin Local Area Aggregates Assessment 201925 and includes the following: 40 26 year's land bank for crushed rock 46 23 year's land bank for sand and gravel 30 years' land bank for clay*  | Updated information as a result of production of the 2025 Local Area Aggregates Assessment.       |
| MOD162 | Council | 175 | Para 14.16                                 | For sand and gravel, the most recent LAA data for the sub-region shows that in 201823, there were ten permitted sites for sand and gravel extraction in Shropshire, sixeight of which were operational.  There is also a further site where a resolution has recently been made to grant planning permission, but the site is not yet operational. Sand and gravel production in Shropshire and Telford and Wrekin, at 0.7188 million tonnes, has significantly recovered from previous years and now surpasses both the ten-year rolling average (0.68 million tonnes), and is the same as the three-year average for (0.71 million tonnes) of sand and gravel production sales is 1.17 million tonnes  | Updated information as a result of production of the 2025 Local Area Aggregates Assessment.       |
| MOD163 | Council | 176 | Para 14.18                                 | The sub-region produced 3.01-2.5 million tonnes of crushed rock in 204823 against a 10 year average of 2.54 3 million tonnes. In 204823 there were 8 permitted sites in Shropshire, 45 of which were operational and 1 permitted and operational site in Telford and Wrekin. The latest available data indicates that crushed rock production in Shropshire and Telford and Wrekin in 204823 was significantly above below both the 10 year trend (2.5498 million tonnes) and slightly above the 3 year trend (2.973 million tonnes). Reserves are distributed across active sites (84.5% of total reserves) and currently inactive sites (15.5%). It is considered there is a robust level of reserves that are 'workable' in the short term. | Updated information as a result of production of the 2025 Local Area Aggregates Assessment.       |
| MOD164 | E173    | 177 | ML3  | k) The historic environment including heritage, archaeological assets and their setting.   | Point of clarification  |
| MOD165 | E126    | 180 | Para 14.41                                 | The purpose of Policy ML5 is to protect <b>controlled waters</b> , the health and wellbeing of existing and future occupiers and, at the same time, to make effective use of land and buildings consistent with the NPPF.  | Point of clarification.   |
| MOD166 | E126    | 180 | ML5<br>(additional<br>Point)               | 2. Development proposals should secure appropriate remediation of sites where contamination is present.  | Additional criterion securing appropriate remediation of sites.                                   |

| MOD167   | E126    | 181             | Para 14.48               | In some instances further site investigation may be required before planning permission can be granted. Planning permission will only be granted subject to conditions. Site investigations should be prepared by a competent person, assessment and agreed remedial measures agreed before any development takes place. This must demonstrate that the land contamination issues have been fully addressed or can be addressed through the development. It is always the developer's responsibility to ensure the safety of the development and its compliance to best practice safety standards and contaminated land best practices. | Clarification around site investigation surveys and how land contamination issues have been addressed.   |
|----------|---------|-----------------|--------------------------|---|--|
| MOD168   | E126    | 181             | Addition to Footnote 27  | Groundwater Position Statements and Risk management framework and the Risk Management Framework: Land contamination risk management (LCRM) - GOV.UK   | Further guidance for clarification   |
| Appendix |         |                 |                          |   |  |
| MOD169   | Council | 183<br>-<br>184 | General                  | Change housing abbreviation to HA1etc and employment abbreviation to EA1 etc.   | Corrections to avoid confusion between housing policies and allocations. Employment changed to keep consistency.   |
| MOD170   | E109    | 183             | HO11                     | Amend site number from 74 to 46 units   | Correction following further evidence from developer.  |
| MOD171   | E128    | 184             | HO26                     | Remove  | Housing site HO26 to be removed from the plan as a result of concern raised by Sport England in relation to the need to assess risk of ball strike to inform the level of housing. The Council support the delivery of the site in principle and as such the land has re-allocated as 'white land' on the submission policies map to allow the site to come forward as windfall development. |
| MOD172   | Council | 184             | Allocation<br>References | <ul> <li>HO27 is now HA26</li> <li>HO28 is now HA27</li> <li>HO29 is now HA28</li> <li>HO30 is now HA29</li> <li>HO31 is now HA30</li> <li>HO32 is now HA31</li> <li>HO33 is now HA32</li> <li>HO34 is now HA33</li> <li>HO35 is now HA34</li> </ul>  | Due to removal of site HO26.   |
| MOD173   | O22     | 188             | Appendix F,<br>Table 12  | Alscott Settling Ponds needs an extra L and should be Allscott Settling Ponds. Lincoln Hil needs an extra L and should be Lincoln Hill. New Hadley Brick Pit should three words New Hadley Brickpit   | Corrections  |
| MOD174   | O22     | 188             | Table 13                 | Dothill should be <b>Dothill and Shawbirch</b> which is the name assigned at designation on 23 November 2023  Langleyfield should be <b>Langley Field</b> which is the name assigned at designation on 7 November 2024  | Corrections  |

|          |                                   |     |          | Simpsons Pool should be <b>Horsehay &amp; Simpsons Pools</b> which is the name assigned at designation on 7 November 2024. <b>Central Hall</b> LNR should be added to the list as it was designated on 23 November 2023.   |  |
|----------|-----------------------------------|-----|----------|--|--|
| MOD175   | O22                               | 189 | Table 13 | Central Hall should not be in this list of proposed LNRs in a plan published in February 2025 because Central Hall LNR was designated on 23 November 2023  | Corrections  |
|          |                                   |     |          | HorsehayPool with Simpsons Pool should not be in this list of proposed LNRs in a plan published in February 2025 because Horsehay & Simpsons Pools LNR was designated on 7 November 2024.  |  |
|          |                                   |     |          | Langley Fields should not be in this list of proposed LNRs in a plan published in February 2025 because Langley Field LNR was designated on 7 November 2024.   |  |
|          |                                   |     |          | Shawbirch should not be in this list of proposed LNRs in a plan published in February 2025 because Dothill & Shawbirch LNR was designated as an LNR on 23 November 2023  |  |
|          |                                   |     |          | Extension to Granville should not be in this list of proposed LNRs in a plan published in February 2025 because Granville Country Park LNR was designated as an extended LNR on 23 November 2023.  |  |
|          |                                   |     |          | Dothill should not be in this list of proposed LNRs in a plan published in February 2025 because Dothill & Shawbirch LNR was designated as an LNR on 23 November 2023.   |  |
| Glossary |                                   |     |          |  |  |
| MOD176   | Wappens<br>hall<br>Consortiu<br>m | 201 | Glossary | Forest Community: Telford is a town set within the landscape which is defined by extensive tree planting. As a 'Forest Community' this approach will be maintained across new areas of development with a strong emphasis on the retention and provision of green infrastructure as set out the policies with in the Plan to help create vibrant communities that are well adapted to climate change.  | Clarification as to what a Forest Community is defined as.       |
| MOD177   | Council                           | 201 | Glossary | Design Brief: A document produced by the landowner/promoter, which is submitted alongside any Masterplan with any outline, full or hybrid planning application. The document should outline any site constraints and encompass the objectives set out in local planning policy including any essential development requirements for specific site allocations. It will form a guide for the design of future full and reserved matters applications; setting out intended uses, design aspirations, street hierarchy etc, in securing a well-designed sustainable site. The National Design Guide (NDG) should be used as the starting point in terms of a template for this document. | Clarification as to what a Design Brief is defined as.           |
| MOD178   | Council                           | 201 | Glossary | Development Brief: A document, produced by the Local Planning Authority, which provides information and guidance about a stalled site; outlining potential uses, planning and infrastructure requirements and design parameters, which encourage desirable and well-considered development.  | Clarification as to what a Site Development Brief is defined as. |

# Minor amends to the Policies Map

These have been included within the Submission Version of the Policies Maps

| Policies Ma | Policies Map |     |           |         |  |  |  |  |
|-------------|--------------|-----|-----------|---------|--|--|--|--|
| -           | Council      | n/a | Site HO26 | Removed | Per modification MOD172                  |  |  |  |
|             |              |     |           |         |  |  |  |  |
| -           | Council      | n/a | Green     | Updated | The Green Network is a live layer and is |  |  |  |
|             |              |     | Network   |         | updated incrementally. Therefore further |  |  |  |
|             |              |     |           |         | updates have been applied since the      |  |  |  |
|             |              |     |           |         | Regulation 19 consultation.              |  |  |  |

# Regulation 22 Consultation Statement

16 Appendix I - Statement of Representations Procedure and **Statement of the Fact** 

## Statement of Representations Procedure

And

Statement of the Fact that the proposed Submission Documents are Available for Inspection and How They Can Be Inspected

#### BOROUGH OF TELFORD AND WREKIN

## TELFORD & WREKIN LOCAL PLAN DEVELOPMENT PLAN DOCUMENT

PLANNING AND COMPULSORY PURCHASE ACT 2004

THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012

Borough of Telford & Wrekin ("the Council") are in the process of developing a new Local Plan and have produced the publication version of the Telford & Wrekin Local Plan which the Council propose to submit to the Secretary of State. The Council is now publishing this version of the Telford & Wrekin Local Plan in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012 to enable those interested to make representation.

Title Document - Telford & Wrekin Local Plan - Publication Version.

The Telford and Wrekin Local Plan sets out how the Local Plan will guide the future development and growth of the area, indicate where development will take place in the administrative area of Borough of Telford and Wrekin ("the Borough"), and guide future planning decisions up to 2040.

**Area Covered** - The Telford & Wrekin Local Plan, when adopted, will form part of the development plan for the Borough. The Telford & Wrekin Local Plan will cover the whole of the Borough.

Publication period - Monday 17 March 2025 until 4pm on Monday 5 May 2025.

All representations on the document must be received by the Council no later than **4pm on Monday 5 May 2025.** 

### Representations

Representations may be made in writing or by way of electronic communications to the following addresses and in the following ways:

• Online at: www.telfordandwrekinlocalplan.co.uk

- Via email to: localplan@telford.gov.uk
- Writing to: Strategic Planning Team, Prosperity & Investment, Telford & Wrekin Council, PO Box 457, Telford, TF2 2FH.

(Representation Forms have been prepared and are available if required online at <a href="https://www.telfordandwrekinlocalplan.co.uk">www.telfordandwrekinlocalplan.co.uk</a>)

Representations may be accompanied by a request to be notified at a specified address of the following -

- The submission of the Telford & Wrekin Local Plan for independent examination under Section 20 of the Planning and Compulsory Purchase Act 2004.
- The publication of the recommendations of the person appointed to carry out the independent examination.
- The adoption of the Telford & Wrekin Local Plan (2040).

During the publication period the Telford & Wrekin Local Plan and all other documents which the Council is required to publish and the proposed submission documents can be viewed on the Council's website at <a href="https://www.telfordandwrekinlocalplan.co.uk">www.telfordandwrekinlocalplan.co.uk</a>. In addition, hard copies are available for inspection at the following locations. (Opening hours for the Council's principal offices are shown below. Opening hours for the other named places are available on the Council's website <a href="https://www.telford.gov.uk/libraries">www.telford.gov.uk/libraries</a>):

- Dawley and Malinslee Community Library Dawley House, 22 Burton Street, Dawley, TF4 2ES
- Madeley Library and First Point The Anstice, Park Avenue, Madeley, Telford, TF7 5BB
- Wellington Library Wellington Civic and Leisure Centre, Larkin Way, Wellington, Telford, TF1 1LX
- Southwater Library Southwater Square, Southwater Way, Telford, TF3 4JG
- Stirchley Community Library The Sambrook Centre, Stirchley, Telford, TF3 1FA
- Newport Library 53 55 High Street, Newport, TF10 7AT
- Oakengates Library the Wakes, Theatre Square, Oakengates, TF2 6EP
- Brookside Central (formerly Brookside Community Centre) Burford, Brookside, Telford, TF3 1LP
- Donnington Community Hub St Matthews Road, Donnington, Telford, TF2 7RB
- Hub on the Hill (formerly Sutton Hill Community Centre) 104-106 Southgate, Sutton Hill, Telford TF7 4HG
- Leegomery Community Centre Leegate Avenue, Leegomery, Telford, TF1 6NA
- Park Lane Centre Park Lane, Woodside, Telford, TF7 5QZ
- **Donnington Library**, Turreff Avenue, Donnington, Telford, TF2 8HG.
- Hadley Library, Hadley Learning Community, Crescent Road, Hadley, Telford, TF1 5NU.