



Telford & Wrekin
Co-operative Council

Protect, care and invest
to create a better borough

Telford and Wrekin Local Plan Review

Submission Document

Duty to Cooperate Statement



2020 - 2040



September 2025



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Duty to Cooperate Statement

1 Introduction

1.1 This statement outlines how Telford & Wrekin Council has managed the requirements of the Duty to Cooperate (DtC) throughout the production of the Telford and Wrekin Local Plan Review 2020-2040. The Duty seeks to ensure that a joined up approach is taken to plan-making where collaborative working with other relevant organisations and bodies seeks to deliver sustainable development within the administrative boundary and the wider area.

1.2 This statement details the work undertaken by the Council to date and identifies how Telford & Wrekin Council has responded to the key strategic and cross boundary issues identified as work on the Local Plan review has progressed. The Council recognise that the 'duty' is a live requirement and will continue to work with organisations as part of the Local Plan examination.

2 Background

National Context

2.1 The Duty to Cooperate is a statutory duty for all Local Planning Authorities (LPAs), introduced in November 2011 through Section 110 of the Localism Act 2011, which established a Duty to Cooperate in relation to the planning of sustainable development.

2.2 LPAs are under a Duty to Cooperate with each other and with other prescribed bodies, on strategic matters that cross administrative boundaries. This includes the requirement to co-operate during the preparation of development plan documents and other local development documents with local planning authorities, county councils, and other relevant bodies.

2.3 Relevant prescribed bodies include:

- Environment Agency;
- Historic England;
- Natural England;
- Homes England;
- Shropshire and Telford Integrated Care Board (ICB);
- Office of Rail Regulation;
- Transport for West Midlands - Integrated Transport Authority;
- National Highways - Highways Authority
- Telford & Wrekin Council – Local Highway Authority.

2.4 Strategic policy-making authorities (such as Telford & Wrekin Council), in collaborating to identify relevant strategic matters covered in their plans, should engage with their local communities and infrastructure providers.

2.5 The National Planning Policy Framework (NPPF) (December 2024) outlines the following matters on which policies should be formulated to address the strategic priorities of the area, including any relevant cross- boundary issues, setting out the overall strategy for the pattern, scale and quality of development:

- Housing (including affordable housing), employment, retail, leisure and other commercial development;

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- Infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- Community facilities (such as health, education and cultural infrastructure); and
- Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

2.6 Whilst, as National Planning Practice Guidance (NPPG) makes clear, the Duty to Cooperate is not a duty to agree, LPAs should make every effort to secure the necessary cooperation on strategic cross boundary matters before submitting local plans for examination. The NPPG also states that '*cooperation should produce effective and deliverable policies on strategic cross boundary matters.*' In order to demonstrate effective and on-going joint working, strategic policy-making authorities are required to prepare, where relevant, and maintain one or more statements of common ground documenting the cross-boundary matters and progress made through co-operatively addressing these.

2.7 The NPPF notes that the examination of a local plan should include an assessment to identify if the plan has been prepared in accordance with legal and procedural requirements. This therefore includes the Duty to Cooperate. The duty requires a proactive, ongoing and focused approach to strategic matters. Constructive co-operation is seen as an integral part of Local Plan preparation and should result in clear planning policy outcomes capable of being demonstrated through the examination process.

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3 Telford & Wrekin's approach to Duty to Cooperate

Key stages of plan making:

- Issues and Options - Consultation ran from October 2020 to January 2021
- Draft Plan (Regulation 18 version) - Consultation ran from October 2023 to January 2024
- Publication Plan (Regulation 19 version) - Consultation ran from March 2025 – May 2025

3.1 It is important that evidence of DtC starts as early as possible and that regular constructive engagement continues throughout the plan making process. This engagement should show the outcomes of the engagement regarding the strategic cross boundary issues and how this has influenced the submitted Local Plan.

3.2 At each stage the Council directly engaged with DtC organisations – this included;

- Informing them directly via the consultation database,
- Meetings to discuss relevant strategic matters,
- Updates on plan making, and
- Consideration of responses to the various consultation stages.

3.3 In between the plan making stages the Council continued to meet with and receive updates from neighbouring Local Planning Authorities as well as other relevant bodies. This engagement has helped to guide decision making.

3.4 The Local Planning Authorities (LPA's) that border the Borough, or share strategic cross-boundary issues that impact both planning areas include:

- Shropshire Council;
- Stafford Borough Council;
- South Staffordshire Council; and
- Staffordshire County Council area

3.5 Other nearby, relevant authorities include:

- The Black Country Authorities (Wolverhampton, Dudley, Sandwell and Walsall);
- Birmingham; and
- Herefordshire.

3.6 It is important the Council engage with neighbouring authorities beyond those adjacent to its boundary, as required in the NPPF. Principally, it is to recognise the relationship with the rest of the West Midlands. Taking a constrained approach to the relationship with surrounding LPAs may leave the Local Plan open to challenge.

3.7 The Council recognise that the requirements of the duty require constructive, active and on-going engagement with its neighbouring LPA's as well as a range of stakeholder organisations. These relationships are mutually beneficial and help to address joint issues such as the provision of infrastructure, where relevant to cross boundary matters. The Council has also engaged, from the outset of plan making, on a constructive, active and on-going basis with LPA's that

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have requested assistance with unmet development needs. This engagement is within the context of Telford's changing relations, as a maturing town with, for example, the Black Country LPA's.

3.8 The Council has worked closely throughout the plan making process with a wide range of infrastructure providers to give early sight of proposed levels, types and location of development. This is critical to those services planning for future needs, being able to secure funding and integrating services as part of future planned developments. A number of these services, such as National Highways and the Local Highway Authority, are prescribed DtC bodies.

Table 1: Engagement with neighbouring Local Planning Authorities

Local Planning Authority	Summary of engagement
Shropshire Council	Between 2020 and 2025, Telford and Wrekin Council have met with Shropshire Council on eight occasions.
City of Wolverhampton Council	Following the cessation of work on the Black Country Plan, Telford and Wrekin Council have met with the City of Wolverhampton Council on a separate basis a total of five times between 2022 and 2024. Further meetings have also taken place with the Black Country Authorities which CWC have been present at (see below).
Sandwell Metropolitan Borough Council	Following the cessation of work on the Black Country Plan, Telford and Wrekin Council have met with Sandwell Metropolitan Borough Council on a separate basis a total of four times between 2023 and 2024. Further meetings have also taken place with the Black Country Authorities which SMBC have been present at (see below).
Dudley Metropolitan Borough Council	Following the cessation of work on the Black Country Plan, Telford and Wrekin Council have met with Dudley Metropolitan Borough Council on a separate basis a total of seven times between 2022 and 2024. Further meetings have also taken place with the Black Country Authorities where DMBC have been present at (see below).

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Walsall Metropolitan Borough Council	<p>Following the cessation of work on the Black Country Plan, Telford and Wrekin Council have met with Walsall Council on a separate basis a total of three times between 2023 and 2024.</p> <p>Further meetings have also taken place with the Black Country Authorities where WMBC have been present at (see below).</p>
Association of Black Country Authorities	<p>Telford and Wrekin Council have met with the Association of Black Country Authorities as a whole on seven separate occasions between 2020 and 2025.</p> <p>Between the end of 2022 and 2024, the Council met with the four ABCA authorities separately due to cessation of work on the BCP, but as plans have progressed it has again become more relevant to meet as one group as TWC's offer of housing has been to the four Black Country Authorities and it will be expected that this is apportioned between them.</p>
Stafford Borough Council	Between 2020 and 2024, Telford and Wrekin Council met with Stafford Borough Council a total of four times to discuss duty to cooperate matters
Hereford Council	Two meetings took place in 2020 and 2021. No strategic matters were raised by either LPA.
Birmingham City Council	Responses were received from Birmingham City Council at both Issues and Options, and Regulation 18 consultations.
South Staffordshire District Council	The Council engaged to produce a Statement of Common Ground for SSDC's submission of their Local Plan.

Table 2: Engagement with prescribed bodies

Prescribed body	Summary of engagement
Environment Agency	The Council invited the EA to view and respond to each stage of consultation on the Local Plan review

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	<p>Responses from the EA were received at Regulation 18 and 19. The Council took feedback from the EA on board, however after the Regulation 19 consultation, a meeting was sought in order to resolve any issues raised by the EA.</p>
Historic England	<p>The Council invited Historic England (HE) to view and respond to each stage of consultation on the Local Plan review.</p> <p>Following responses received at both Regulation 18 and Regulation 19 consultations, the Council met with Historic England to discuss issues raised.</p> <p>A Statement of Common Ground is being produced between both parties, however in the absence of this at submission, a letter has been agreed between the parties.</p>
Natural England	<p>The Council invited Natural England (NE) to view and respond to each stage of consultation on the Local Plan review</p> <p>Natural England provided representations at all stages of consultation to the Council which has helped shape the Plan itself</p>
Homes England	<p>The Council has engaged with Homes England effectively and consistently throughout the production of the plan as part of the Wappenshall consortium that represent SC3.</p> <p>The nature of this engagement will be captured through a Statement of Common Ground with the Sustainable Community consortium.</p>
NHS Shropshire and Telford and Wrekin Integrated Care Board	<p>The Council meet with the ICB on a quarterly basis and have done since the beginning of the plan review (2020).</p> <p>Where necessary the parties have met on additional occasions. For example, when the Council were producing the Infrastructure Delivery Plan.</p>

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National Highways	<p>National Highways had early sight of sites likely to come forward for allocation before the draft plan was published for consultation.</p> <p>Following this, the Council engaged a consultant to carry out Transport Modelling to support the Local Plan evidence base. National Highways engaged with the council regarding this and agreed to the approach being taken and its outputs.</p> <p>This work then fed directly into the Infrastructure Delivery Plan and Statement of Common Ground.</p>
Sport England	<p>Sport England had early sight of sites likely to come forward for allocation before the draft plan was published for consultation. The Council and SE then worked on procuring an update to the Facilities Plan Modelling for Swimming Pools and Sports Halls which fed directly into the Infrastructure Delivery Plan.</p> <p>In addition, SE were consulted at every stage and provided constructive comments to the Council which have been considered throughout the plan.</p>
Telford & Wrekin Council – Local Highway Authority (Strategic Transport and Development Control)	<p>The LHA had early sight of sites likely to come forward for allocation after the Call for Sites exercise took place and before the draft plan was published for consultation.</p> <p>The LHA provided Strategic Planning with comments on each site in relation to highways.</p> <p>Colleagues supported where necessary in the procurement of Transport Modelling to support the Plan as well as a SWOT analysis of the Sustainable Community sites and an update to the Growth Strategy.</p>
Lead Local Flood Authority	<p>The LLFA had early sight of sites likely to come forward for allocation after the Call for Sites exercise took place and before the draft plan was published for consultation.</p> <p>The LLFA provided Strategic Planning with comments on each site in relation to drainage.</p>

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	Colleagues supported where necessary in the procurement of both the Water Cycle Study, and the Strategic Flood Risk Assessment.
Office of Rail and Road (ORR)	<p>The Council engaged with the ORR at every stage of consultation; however, no response was ever received.</p> <p>The Council consider that there are no significant issues that would impact the ORR. National Highways and the Local Highway Authority have not raised any significant issues with the Local Plan in the fields of rail or road.</p>
Transport for West Midlands	<p>The Council engaged with the Transport for West Midlands at every stage of consultation, however, no response was ever received.</p> <p>The Local Highway Authority has provided advice, where relevant, on regional transportation schemes and no significant issues were identified.</p>

Table 3: Engagement with other parties in relation to the Duty

Other parties	Summary of engagement
West Midlands Aggregates Working Party	The AWP group meets on a regular basis and provides a forum for discussion on minerals matters between LPA's and the minerals industry. The Council regularly attends this meeting and works as a joint mineral planning area with Shropshire Council.
West Midlands Regional Technical Advisory Board (Waste)	The RTAB group meets on a regular basis and provides a forum for discussion between Waste Planning Authorities, the waste industry and the Environment Agency on waste planning matters. The Council regularly attends the meetings and has sought feedback from RTAB as part of the plan making process.
National Grid Electricity Distribution (NGED)	The Council engaged with NGED to ensure that future planned development can be accounted for within their asset management cycles. This entailed the Council inputting into

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	the DFES planning exercise on an annual basis and this will feed into the RII0-ED3 business plan.
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4 Telford & Wrekin Local Plan review Strategic Matters

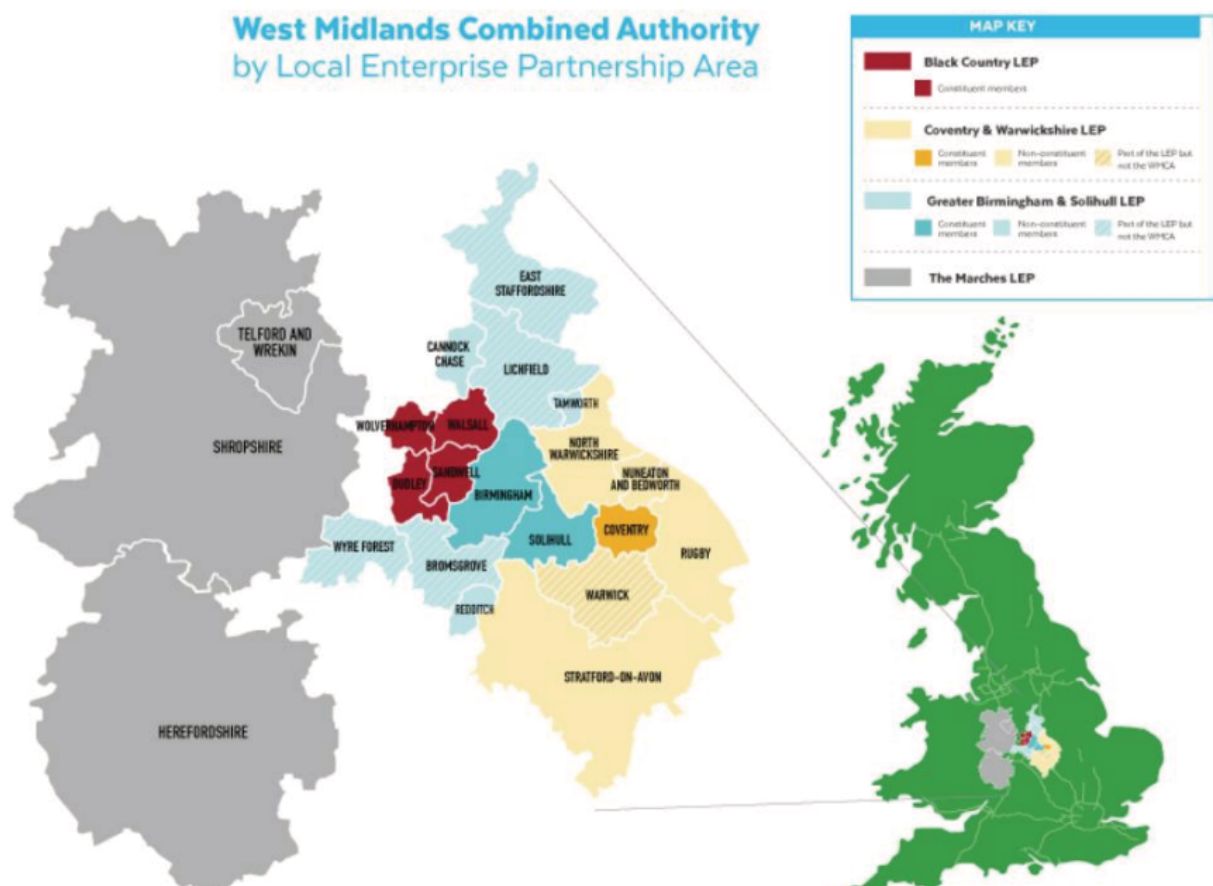
4.1 The main strategic matters being addressed through the Telford and Wrekin Local Plan review are:

- Addressing requests to help meet unmet housing need in neighbouring areas
- Strategic cross boundary transport
- Minerals and waste flows
- Gypsy and traveller accommodation
- Other matters (utilities, education, healthcare, flood risk etc.)

Housing

4.2 In July 2018, the Council received a letter from the Association of Black Country Authorities (ABCA) on behalf of all four Black Country Authorities (BCA's) as a non-constituent member of the West Midlands Combined Authority (WMCA) (shown in **figure 1**)

Figure 1 - West Midlands Combined Authority



4.3 The letter formally asked whether Telford & Wrekin Council were able to help meet some of the BCA's unmet need (both regarding housing and employment). The letter also sought to identify any other issues of strategic cross-boundary significance that should influence the preparation of the Black Country Plan.

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4.4 At this point, following discussions at Examination in Public for the 2011-2031 Local Plan, Telford & Wrekin Council were not in a position to consider an offer of housing or employment land to the BCA's due to there being insufficient evidence of the relationship between Telford and Wrekin and the Black Country. The Council did however make a commitment to monitor the matter in light of any new and emerging evidence.

4.5 A follow up letter from ABCA on behalf of the BCA's was received by the council in August 2020 whereby the council were asked to confirm levels of housing and employment being proposed within the Local Plan review and again asked whether any sites could be attributed to help meet some of the BCA's unmet housing need. The BCA's confirmed that the level of unmet need, at the time, was circa. 7,000 homes.

4.6 Again, the Council were not confident that there was enough evidence and responded to confirm that no offer of housing was able to be made at that point in the plan making process. The Council was at the early stage in the plan making process and had not yet identified potential land allocations.

4.7 The Council consulted on its Issues and Options document in 2020 and in response to the consultation ABCA sent a letter which outlined that, for the Black Country, a higher housing and employment figure was favourable in order for the plan to deliver sufficient capacity to accommodate unmet cross boundary development needs. This was in light of the BCA's unmet need increasing further from 14,550 to 16,500 homes, and 237 to 535 hectares of employment land.

4.8 In light of the comments received by the BCA's during the Issues and Options consultation, the Council took a view that a contribution of housing would be made to the authorities, subject to sufficient supply over and above its own local needs being identified. At Regulation 18 (draft plan) stage, the Council confirmed a contribution to the Black Country Authorities of 80 units per year throughout the plan period 2020-2040. This offer was tested and confirmed within in the Housing Requirement Technical Paper which was published for consultation for the Regulation 18 consultation:

- *'The difference between the proposed requirement and the Council's alternative to housing need calculated using the standard method (80 dwellings per annum) forms the basis of the Council's proposed approach to contribute towards part of the Black Country's unmet needs based on the positive application of the findings for the evidence base in Telford & Wrekin. This reflects positive planning to support current and future demographic trends that sit outside the approach to assessing housing need in accordance with national policy and guidance.'*

4.9 During consultation the Council received numerous requests, including from the BCA's and Shropshire Council, for the offer of housing to the Black Country to be included within policy in the Local Plan document. The BCA's also requested an early review clause be included within the plan, as the NPPF requires Local Plans to be reviewed every 5 years, and the reduced timeline of 30 months for preparation of plans under the incoming system, the Council did not consider inclusion of an early review clause as being necessary.

4.10 Following the Regulation 18 consultation, the NPPF was republished in December 2024 with changes made to the calculation of the standard method. Following the changes, Telford and Wrekin's housing need figure was calculated as 857 homes per annum, this enabled the Council to identify an enhanced contribution of 153 homes per annum within the publication

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version (Regulation 19) of the Local Plan. The contribution figure was further established by recognising migration flows and a further uplift in homes (this is addressed in further detail within the Housing Delivery topic paper (Sep 25). Further to the consultation on the publication version of the plan the nationally set inputs to the calculation of the standard method figure have changed and, as per NPPF requirements the new need figure has been identified as 881 per annum, an increase of 24 units.

4.11 The Council have accommodated this additional 24 units by increasing its requirement to 1,034 homes per annum, thus maintaining the original contribution to the BCA's request for assistance of 153 homes per annum. These additional units are met from the identified housing supply buffer.

4.12 The contribution is set out in the publication version of the plan (Regulation 19) in policy S4 Housing Delivery Strategy.

4.13 The Council has provided written confirmation to neighbouring BCA's that it will sign an updated Greater Birmingham and Black Country Housing Market Area Statement of Common Ground (GBBCHMA SoCG), that reflects the submission position of the Local Plan. The purpose of the statement is to apportion contributions from surrounding Local Planning Authorities, such as TWC, towards the BCA's and Birmingham unmet development needs.

Table 4: GBBCHMA unmet need (2024)

Authorities with an evidenced unmet need			
Birmingham	Regulation 18 Plan published July 2024	Shortfall of - 46,000 at Regulation 18 Stage	2023-2042
Dudley	Regulation 19 Plan published October 2024	Shortfall of - 699 at Regulation 19 Stage	2024-2041
Sandwell	Regulation 19 Plan published September 2024	Shortfall of - 15,916 at Regulation 19 Stage	2024-2041
Walsall	Regulation 18 Black Country Plan published August 2021	Shortfall of 3,314 Regulation 18 Stage	2020-2039
Wolverhampton	Regulation 19 Plan published November 2024	Shortfall of - 10,398 at Regulation 19 Stage	2024-2042

Employment

4.14 Following cessation of work on the Black Country Local Plan, no requests to meet unmet employment needs have been made to the Council – for clarity TWC is outside of the West Midlands FEMA. As part of their responses to the publication version of the Local Plan the BCA's confirmed there was no request to contribute towards any unmet employment development needs.

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Strategic cross boundary transport

4.15 The key strategic transportation routes serving the borough are the Shrewsbury to Wolverhampton railway line which stops at Wellington, Oakengates and Telford within the borough. Both Shropshire Council and City of Wolverhampton Council support the aspiration to electrify the rail line to provide better, more frequent services. At present there is no identified funding to deliver the project and this remains an aspirations for the three Councils.

4.16 The M54 motorway runs east / west through Telford and forms the main connection to the national motorway network. It is a key commuter and freight route and provides connections to the West Midlands as well as onward connections to the port of Holyhead to the west. The Council, Shropshire Council and City of Wolverhampton Council support the delivery of the M54 / M6 link road, which will provide a direct link from the M54 to the M6 north. This will connect the borough directly with the motorway network serving the northwest. Pre-construction surveys are underway and National Highways are in the process of procuring a delivery partner. The delivery timeline is yet to be confirmed. The Council and its partners will keep this project, and any related planning issues, under review as the project progresses.

Minerals

4.17 The Council regularly attends the West Midlands Aggregates Working Party (WMAWP) meetings.

4.18 This party was established in the early 1970s as technical groups to advise the Government on aggregates demand and supply issues. The WMAWP is composed of representatives from minerals planning authorities, the aggregates industry, The Environment Agency, Non-Government Organisations (NGO's) and Government representation. The group reviews and advises on individual LAA documents before they are published.

4.19 Having regard to its Duty to Cooperate, the Council has undertaken extensive engagement with a range of bodies to help inform Local Plan policy. The Duty to Cooperate paper sets out in detail how the Council has discharged this duty. From the perspective of minerals planning, the Council has been in discussions with Shropshire Council and Staffordshire Council in respect of mineral supply and demand. Discussions, email exchanges and meetings have also taken place with both the Coal Authority and the minerals industry operators too.

4.20 The Council has also shared a copy of the draft Telford & Wrekin Local Plan with the WMAWP group for comment as part of the consultation phase. No comments were directly made on the document. The AWP group were informed of the Regulation 19 consultation and evidence base for the purposes of submitting further comments. Comments recieved from consultees at the Regulation 19 have been considered as part of proposed modifications.

4.21 The Shropshire and Telford LAA (2025) was circulated for comments with the AWP in May 2025. A number of comments were received which have been considered in final drafting of the LAA. A schedule of comments and responses have been included in Annex A of the LAA (2025) document.

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Waste

4.22 The Council are a member of the West Midlands Regional Technical Advisory Board for waste planning matters. The West Midlands Resource Technical Advisory Body (WMRTAB) is a group comprising waste planning and management officers of the Waste Planning Authorities (WPAs) in the West Midlands, the Environment Agency, representatives of industry including the waste management industry, and representatives of environmental organisations.

4.23 WMRTAB group provided a response to the draft plan (Regulation 18) dated 31 January 2024. The key issues raised included:

- Reliance of a single year's data for waste forecasting waste movements in the original Waste Arising's Study (2021) when a 3 year trend would be preferable.
- The need for consultation with other WPA's in relation to the movement of waste into and out of the borough
- The need to confirm there are no capacity issues in relation to incinerator capacity for the movement of Local Authority Collected Waste into Battlefield (Shropshire) and Four Ashes (Staffordshire).

4.24 As part of the draft plan response WMRTAB confirmed that Telford and Wrekin Council is an active member of WMRTAB and an officer from the Council regularly attends the group's meeting and contributes to its work. WMRTAB has therefore facilitated discussion between Telford and Wrekin Council and other neighbouring waste planning authorities to assist with meeting its Duty to Cooperate (DtC) on matters pertaining to planning for future waste management.

4.25 Following the draft plan stage of plan making and in response to the WMRTAB comments the Council took the following action:

- The Waste Arising's Study was updated to include a 3 year trend as requested as part of the published 2024 update study.
- In May 2024 the Council took a proportionate approach and wrote out to all WPA's that met the following thresholds to determine whether there were any significant waste planning issues to be addressed. No significant cross boundary matters were raised, however the Council will continue to engage with other WPA's, where relevant. The threshold for engagement are set out below;
 - 10,000 tonnes per annum (tpa) of inert construction, demolition and excavation (CD&E) waste
 - 5,000 tonnes per annum (tpa) non-hazardous Household Industrial & Commercial (HIC) waste
 - 100 tonnes per annum (tpa) hazardous waste
- As part of the above process Shropshire Council and Staffordshire County Council confirmed that waste movements can continue between the borough and their respective areas.

Gypsy and Traveller Needs

4.26 A new Gypsy and Traveller and Travelling Showperson Accommodation Assessment was produced by consultants at Arc 4 in 2021 and further updated in 2023. The document provides detail of the borough wide need up until 2040.

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4.27 A need of 26 pitches was identified over the plan period, including 17 pitches within the first five years of the plans adoption. The Council carried out two 'Call for Sites' exercises and had a single submission for Gypsy and Traveller Accommodation. This was deemed not to be suitable as it was not supported by a proposal for Gypsy and Traveller accommodation that would demonstrate effective delivery and the size of the site would have provided limited additional provision.

4.28 At Regulation 19, Shropshire Council raised concern that there was an outstanding cross boundary issue as it is believed that the Council have insufficient capacity for their need across proposed allocations. In addition, it was raised by SC that reliance on such a mechanism to meet identified need is not consistent with the Planning Policy for Traveller Sites (2024) (PPTS). However, Shropshire Council did recognise that the Council had made steps towards a more positive approach to meeting their own need.

4.29 The Council have been working on a strategy to meet their own need which has involved identifying possible sites for development. TWC have identified a site within their control which will have the potential capacity for at least 13 additional pitches, this will be subject to a windfall application. In addition, the council has also had a further 4 pitches which have been granted permission since the GTAA update was completed. The remaining shortfall for the latter period of the plan will be met by expansion of existing sites within Council control, windfall sites and further plan reviews (including Call for Sites). TWC will be confident that the additional pitches required in the later period of the plan can be met via the above actions and at this stage do not consider there to be an unmet need within the Borough.

4.30 South Staffordshire District Council wrote to TWC in January 2022 and then in August 2022 asking for assistance in meeting the unmet need for pitches within South Staffordshire. Through this engagement SSDC sought confirmation that TWC would take the same steps as SSDC in exploring options for new pitches (including in the Green Belt); namely plots available within existing sites, options for a new publicly run sites including use of existing publicly owned land, or as part of proposed housing allocations. TWC have subsequently confirmed that their emerging Gypsy and Traveller evidence base indicates that they will have a need for pitch provision that will need to be addressed over the period of the Telford & Wrekin Local Plan Review. In TWC's view, as the Council have their own existing shortfall in pitches to prioritise, the position with the Telford and Wrekin Local Plan means it is not possible for TWC to guarantee a contribution towards any unmet need. This position is agreed between both parties, however it will be kept under review.

4.31 A similar request was received from Sandwell Metropolitan Borough Council, however TWC responded by email to explain the above position. No further requests have been made and SMBC confirmed that no further SoCG would be required.

Other matters (utilities, education, healthcare, flood risk etc.)

4.32 There were no other strategic cross boundary matters raised as part of Duty to Cooperate discussions. The Council will continue to engage on a constructive, active and on-going basis with all parties as part of the plan making process.

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5 Outcomes from Duty to Cooperate engagement

5.1 Council have confirmed offer of 153 unit contribution to Black Country Local Planning Authorities in Policy S4 - Housing Delivery Strategy. This is a positive offer which reflects the migration patterns between the Black Country area and Telford and the scale of the unmet needs faced by the area. It also reflects the capacity of the borough and the local housing market area.

5.2 The Council welcomes on-going engagement with the Black Country area to understand what additional measures they will be taking through their plan reviews to ensure they are maximising available sources of supply such as densification of brownfield sites and green belt reviews, given the exceptional circumstances of not being able to meet their housing needs now and (most likely) in the future.

5.3 The Council have confirmed that, sites within Council control enable a credible strategy to meet its own needs for Gypsy and Traveller accommodation. In the absence of any further private sites coming forward, the Council has inform Councils who have requested assistance that it is not in a position to provide certainty regarding contributing towards their unmet needs.

5.4 Cross boundary engagement on waste matters confirms that flows can continue as they have been for the duration of the plan. This matter will be kept under review with future plan reviews.

5.5 Table 5 below sets out a summary record of engagement with all prescribed bodies that the Council has undertaken throughout the course of the production of the Telford and Wrekin Local Plan review (2020-2040).

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6 Summary record of engagement relating to TWLPR

Table 5

Prescribed Body	Method of engagement	Topics discussed and outcomes
Neighbouring Authorities		
Shropshire Council	<p>Meetings took place on the following dates:</p> <p>14/12/2020</p> <p>25/04/2023</p> <p>25/05/2023</p> <p>15/08/2023</p> <p>07/06/2024</p> <p>15/07/2024</p> <p>02/10/2024</p> <p>30/04/2025</p>	<p>Discussions principally covered Local Plan updates and Shropshire Councils progress with EiP. Discussion around joint evidence work, such as the Local Area Aggregates Assessment, also took place.</p> <p>TWC engaged with SC on the production of a SoCG (dated August 2021) to support the submission of their Local Plan. This was signed by TWC on 27 August 2021.</p> <p>Strategic cross boundary matters kept under review including;</p> <ul style="list-style-type: none"> • Employment • Housing • Infrastructure (education, highways etc.) • Waste • Minerals • Gypsy and Traveller Accommodation <p>SC and TWC, as a joint minerals planning area, cooperate in the preparation of a Local Aggregate Assessment, the most recent LAA published in 2025 demonstrates that both authorities can meet the requirements sand and gravel and crush rock over the period of the Local Plan and therefore no further allocations are required.</p> <p>It was agreed that cross boundary movement of pupils in relation to education provision will be kept under review.</p> <p>Waste movements were agreed to be able to remain the same between both authorities.</p>

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		<p>No cross-boundary employment or housing issues were identified but were discussed and will remain under review.</p> <p>Modifications to policy was agreed between LPA's in relation to infrastructure, recognising that there may be scenarios where developer contributions may be considered on a cross-boundary basis. This includes highways.</p> <p>Gypsy and Traveller Accommodation has been discussed on several occasions, and a position has been agreed within a SoCG (Appendix 1).</p>
Stafford Borough Council	<p>Meetings took place on the following dates:</p> <p>17/12/2020</p> <p>16/11/2022</p> <p>14/11/2023</p> <p>03/06/2024</p>	<p>Local Plan updates from both LPA's - discussed experiences at different stages of consultation.</p> <p>Discussions regarding Aqualate Mere, a RAMSAR site which sits on the Telford/Stafford boarder but lies wholly within SBC authority area.</p> <p>TWC shared updates on Newport Employment Land Review.</p> <p>No cross-boundary issues were raised but TWC agreed to remain committed to continuing engagement and sharing evidence-based work where necessary (Appendix 2)</p>
City of Wolverhampton Council	<p>Meetings took place on the following dates:</p> <p>01/11/2022</p> <p>03/04/2023</p> <p>15/05/2023</p> <p>28/05/2024</p> <p>16/09/2024</p>	<p>Updates on Plan progress, evidence base to be commissioned/updated, agreement on strategic matters and housing land contribution from TWC to BCLAs.</p> <p>Discussion on progressing GBBCHMA SoCG to apportion the housing contributions and agreement to the methodology.</p> <p>Agreed it was unlikely a further bilateral SoCG was required between the two LAs.</p> <p>Potential apportionment of 37% homes to Wolverhampton. Subject to formal agreement via GBBHMA SoCG as of</p>

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		November 2024 (Appendix 7). See Appendix 8 for letter from TWC sent post Submission of the WLP.
Dudley Metropolitan Borough Council	<p>Meetings took place on the following dates:</p> <p>16/11/2022</p> <p>05/04/2023</p> <p>15/05/2023</p> <p>03/07/2023</p> <p>21/06/2024</p> <p>09/09/2024</p> <p>11/11/2024</p>	<p>General Updates on Plan progress, evidence base to be commissioned /updated, agreement on strategic matters and housing land contribution from TWC.</p> <p>Discussion on progressing GBBCHMA SoCG to apportion the housing contributions and agreement to the methodology.</p> <p>Agreed it was unlikely a further bilateral SoCG was required between the two LAs.</p> <p>Potential apportionment of 15% homes to Dudley. Subject to formal agreement via GBBHMA SoCG as of November 2024 (Appendix 7).</p> <p>TWC are a party to the GBBCHMA SoCG and have, in principle, agreed the document subject to updates in line with TWC's most recent Local Plan position by return of a letter (Appendix 8).</p>
Sandwell Metropolitan Borough Council	<p>Meetings took place on the following dates:</p> <p>19/04/2023</p> <p>23/05/2023</p> <p>04/07/2023</p> <p>21/08/2024</p>	<p>General Updates on Plan progress, evidence base to be commissioned /updated, agreement on strategic matters and housing land contribution from TWC.</p> <p>Discussion on progressing GBBCHMA SoCG to apportion the housing contributions and agreement to the methodology.</p> <p>Request from SMBC regarding their Gypsy and Traveller Accommodation shortfall (Appendix 12). This was addressed by TWC via email as per SMBC's request.</p> <p>Potential apportionment of 18% homes to Sandwell. Subject to formal agreement via GBBHMA SoCG as of November 2024 (Appendix 7).</p>

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		TWC are party to the GBBCHMA SoCG and have agreed in principle to sign the document subject to updates in line with TWC's most recent Local Plan by return of a letter (Appendix 8). Sandwell were advised by their Inspector that a letter addressed to them would be more relevant – this can be found in Appendix 11 .
Walsall Council	<p>Meetings took place on the following dates:</p> <p>03/04/2023</p> <p>22/05/2023</p> <p>06/09/2024</p>	<p>General Updates on Plan progress, evidence base to be commissioned/updated, agreement on strategic matters and housing land contribution from TWC.</p> <p>Discussion on progressing GBBCHMA SoCG to apportion the housing contributions and agreement to the methodology.</p> <p>Potential apportionment of 23% homes to Walsall. Subject to formal agreement via GBBHMA SoCG as of November 2024 (Appendix 7).</p> <p>TWC are a party to the GBBCHMA SoCG and have, in principle, to sign the document by return of a letter, following an update reflecting the latest position of the Telford and Wrekin Local Plan (Appendix 8).</p>
Association of Black Country Authorities	<p>Meetings took place on the following dates:</p> <p>14/12/2020</p> <p>23/03/2021</p> <p>29/06/2021</p> <p>27/07/2021</p> <p>27/07/2022</p> <p>07/11/2023</p>	<p>Initial meetings held between Telford & Wrekin and BCAs on local plan position relating to the BCP – request made by BCAs for housing contribution from TWC.</p> <p>No contribution offer was made during the progression of the BCP.</p> <p>Following the work ceasing on the Black Country Plan (BCP) in October 2022, TWC met with the Black Country Local Authorities (BCLAs) individually upon their request.</p>

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	15/04/2025	<p>Update on relevant matters discussed in meetings on 07/11/2023 and 15/4/25 where housing contribution and apportionment was discussed.</p> <p>Discussion on progressing GBBCHMA SoCG to apportion the housing contributions and agreement to the methodology following progression of relevant Local Plans (Appendix 7)</p> <p>TWC are a party to the GBBCHMA SoCG and have, in principle, to sign the document by return of a letter, following an update reflecting the latest position of the Telford and Wrekin Local Plan (Appendix 8).</p> <p>Agreed that no additional SoCG's were required between the individual LPA's</p>
South Staffordshire District Council	<p>A meetings took place on the following date:</p> <p>01/12/2020</p>	<p>An initial meeting was held to discuss possible cross-boundary issues. Following this, engagement took place over email.</p> <p>TWC engaged with SSDS in 2024 to produce a Statement of Common Ground for SSDC's submission of their Local Plan, this was signed by TWC on 07/11/2024.</p> <p>Following this, SSDC engaged with TWC on the production of the SoCG for TWC's Local Plan submission (Appendix 15), position at September 2025.</p>
Birmingham		<p>Responses were received from Birmingham City Council at both Issues and Options, and Regulation 18 consultations.</p> <p>Following discussions had with the Black Country Authorities, it was considered that there was a stronger relationship with those authorities. Therefore, the contribution of housing was agreed within the GBBCHMA SoCG and additional letter from TWC and was apportioned to the four BCA's only.</p>

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Hereford	<p>Meetings took place on the following dates:</p> <p>15/12/2020</p> <p>22/06/2021</p>	Two meetings took place in 2020 and 2021. No strategic matters were raised. It is considered that this position has not altered.
Statutory Bodies		
Environment Agency (EA)	<p>Meetings took place on the following dates:</p> <p>20/05/2025</p>	<p>The EA Had early sight of sites likely to come forward for allocation before the draft plan was published for consultation. This provided the EA chance to provide feedback; however, no feedback was received.</p> <p>The Council engaged with the EA at every stage of consultation – response was received at Regulation 18 and 19. Feedback was taken on board following both responses.</p> <p>As the Council recognised that there were ongoing issues raised by the EA following the end of the Regulation 19 consultation, a meeting was arranged, and the Council have worked to agree changes to the plan and commission additional evidence to help agree a Statement of Common Ground.</p> <p>In response to the EA's concerns the Council carried out the following:</p> <ul style="list-style-type: none"> - Commissioned JBA to produce an addendum to the Strategic Floor Risk Assessment to be in line with the NaFRA2 data which was published by the Government in January 2025. - Liaised with Severn Trent Water on issues raised by the EA to provide answers to questions asked within their Regulation 19 response - Considered modifications to the plan based off the response from the EA. <p>The above have all been provided to the EA for their consideration.</p>

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		Work is ongoing to agree a final SoCG, however it should be noted that both parties have agreed there are no fundamental issues outstanding at submission.
Historic England (HE)	<p>Meetings took place on the following dates:</p> <p>11/03/2024</p> <p>22/05/2025</p> <p>20/08/2025</p>	<p>Following responses received at both Regulation 18 and Regulation 19 consultations, the Council met with Historic England to discuss issues raised.</p> <p>The Council subsequently agreed suggested modifications with HE which will be submitted to the Planning Inspectorate. In addition, HE also agreed the principle of a Heritage Impact Assessment which was commissioned by the Council following recommendation from Historic England.</p> <p>A Statement of Common Ground is being produced between both parties, however in the absence of this at submission, a letter (Appendix 17) has been agreed between the parties before HE are able to agree on the final Heritage Impact Assessment work commissioned by the Council.</p> <p>If necessary, the Council is committed to further meetings with HE to resolve any outstanding issues.</p>
Natural England (NE)	<p>A meeting took place on the following date:</p> <p>02/05/2025</p>	<p>NE responded to all stages of consultation that the Council held in relation to the Local Plan review.</p> <p>A meeting was arranged 2 May 2025 to discuss whether there were any significant outstanding issues, it was agreed that there were no outstanding issues preventing the Plan from progressing.</p> <p>Telford wrote to Natural England and it was agreed that the duty had been met via an email response from NE (Appendix 18).</p>

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Homes England	Homes England attended Regular meetings with Wappenshall Consortium as a significant land holder.	<p>The Council has engaged with Homes England effectively and consistently throughout the production of the plan as part of the Wappenshall consortium that represent SC3.</p> <p>This is the only site proposed for allocation within the Plan which Homes England has land interest in.</p> <p>The nature of this engagement will be captured through a Statement of Common Ground with the Sustainable Community consortium.</p> <p>This position was provided to the Council by Homes England within their response to the Regulation 19 consultation.</p>
NHS Shropshire and Telford and Wrekin Integrated Care Board (ICB)	Quarterly meetings during plan preparation	<p>The Council meet with the ICB on a quarterly basis and have done since the beginning of the plan review (2020).</p> <p>Both the Local Plan and other planning matters are discussed at these meetings. From the outset, the Council has given the ICB sight of sites possible to come forward for allocation. This has allowed the ICB to consider this within their asset management and estate planning and given the Council additional opportunity to receive feedback on where issues may arise.</p> <p>Where necessary the parties have met on additional occasions. For example, the NHS STW ICB worked with the Council on the production of the Infrastructure Delivery Plan to identify infrastructure requirements for the level of development proposed.</p> <p>Following this, a Statement of Common Ground was agreed between both parties (Appendix 19)</p>

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Sport England (SE)	<p>Meetings took place on the following dates:</p> <p>06/09/2023</p> <p>15/04/2024</p> <p>04/09/2025</p>	<p>Sport England had early sight of sites likely to come forward for allocation before the draft plan was published for consultation.</p> <p>Meetings came off the back of this where it was identified that an update of the Facilities Plan Modelling for Sports Halls and Swimming Pools was required.</p> <p>Strategic Planning worked alongside TWC's Leisure team and Sport England to commission and produce this work. This work fed directly into the Infrastructure Delivery Plan as it identified projects required for the future.</p> <p>In addition, SE were consulted at every stage and provided constructive comments to the Council which have been considered throughout the plan.</p> <p>Meetings took place on 06/09/2023, 15/04/2024 and 04/09/2025. Additional meetings took place between this whereby the Facilities Plan Modelling was discussed with the consultants.</p> <p>To confirm that the Duty had been met and cover additional points raised by SE, TWC sent a letter (Appendix 20). Sport England by return of letter confirmed that the Duty had been met as of September 2025 (Appendix 21)</p>
National Highways (NH)	<p>Meetings took place on the following dates:</p> <p>27/02/2023</p> <p>07/11/2024</p>	<p>The Council shared an early version of sites possible for allocation in July 2023, ahead of the draft plan consultation. Acknowledgment of this information being shared was received by the Council, however no feedback at this time was given by National Highways.</p> <p>Following this, the Council engaged a consultant to carry out Transport Modelling to support the Local Plan evidence base. National Highways engaged with the council regarding this and agreed to the approach being taken. A meeting took</p>

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		<p>place on 27/02/2023 and feedback was provided on an ongoing basis until June 2023.</p> <p>In addition, NH were then able to confirm that there was no concern over there being unacceptable impacts on the SRN due to additional development as shown within the Transport Modelling outputs which were presented at a meeting on 07/11/2024.</p> <p>This work then fed directly into the Infrastructure Delivery Plan and led to the production of a Statement of Common Ground between both parties (Appendix 22)</p>
Local Highway Authority (LHA) – Strategic Transport and Development Control	Bi-Weekly meetings	<p>Both teams had early sight of sites likely to come forward for allocation after the Call for Sites exercise took place and before the draft plan was published for consultation.</p> <p>Strategic Planning consulted with the LHA on all sites submitted through the Call for Sites exercises. Comments were then provided to the Strategic Planning team on each site in relation to highways. This assisted the Strategic Planning team in assessing each site to find the most achievable, viable and deliverable sites for allocation. Comments on the Sustainable Community sites were explored through the Strategic Transport team by way of procuring a SWOT (strengths, weaknesses, opportunities and threats) analysis from consultants Atkins.</p> <p>Strategic Planning have engaged with Strategic Transport to jointly produce a Transport Modelling Assessment for the Local Plan. Though this process both teams agreed; scenario testing, sensitivity testing and mitigation testing. The outcome was a list of mitigation schemes which would be required to support</p>

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		<p>development proposed throughout the Local Plan. This fed directly into the Infrastructure Delivery Plan.</p> <p>Strategic Planning have engaged with Highways Development Control team effectively to ensure that a full and complete assessment could be carried out on each site. In areas of uncertainty, further clarification was sought. More recently the team have been assisting on the production of a framework for securing developer contributions.</p> <p>Letters were received from both areas within the LHA to confirm that the duty had been met (Appendix 23 and 24)</p>
Lead Local Flood Authority (LLFA)	<p>Meetings took place on the following dates:</p> <p>24/01/2023</p> <p>13/07/2023</p> <p>14/08/2023</p> <p>23/11/2023</p> <p>14/11/2024</p> <p>11/03/2025</p>	<p>The LLFA had early sight of sites likely to come forward for allocation after the Call for Sites exercise took place and before the draft plan was published for consultation.</p> <p>Strategic Planning consulted with the LLFA on all sites submitted through the Call for Sites exercises. Comments were then provided to the Strategic Planning team on each site in relation to drainage. This assisted the Strategic Planning team in assessing each site to find the most achievable, viable and deliverable sites for allocation.</p> <p>As identified in the Infrastructure Delivery Plan, the LLFA has also been collaborating with the LPA and Severn Trent Water, as the incumbent sewerage undertaker, around Strategic Infrastructure projects which could be required as additional development comes forward</p> <p>Colleagues supported where necessary in the procurement of both the Water Cycle Study, and the Strategic Flood Risk Assessment. Meetings for both took place during and throughout 2024, in addition to those noted to the left.</p>

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		The LLFA confirmed via letter to Strategic Planning that the duty had been met as of September 2025 (Appendix 25)
Transport for West Midlands		<p>The Council engaged with the Transport for West Midlands at every stage of consultation; however, no response was ever received.</p> <p>The Local Highway Authority has provided advice, where relevant, on regional transportation schemes and no significant issues were identified.</p>
Office of Rail and Road (ORR)		<p>The Council engaged with the ORR at every stage of consultation; however, no response was ever received.</p> <p>The Council consider that there are no significant issues that would impact the ORR. National Highways and the Local Highway Authority have not raised any significant issues with the Local Plan in the fields of rail or road.</p>
Other Parties		
West Midland Aggregates Working Party (WMAWP)	Bi-annual meetings	<p>The AWP group meets on a regular basis and provides a forum for discussion on minerals matters between LPA's and the minerals industry.</p> <p>The Council regularly attends this meeting and works as a joint mineral planning area with Shropshire Council.</p> <p>The group were also informed of consultation at every stage.</p>
West Midlands Regional Technical Advisory Board (WMRTAB – waste)	Bi-annual meetings	<p>The RTAB group meets in a regular basis and provides a forum for discussion between Waste Planning Authorities, the waste industry and the Environment Agency on waste planning matters.</p> <p>The Council regularly attends the meetings and has sought feedback from RTAB as part of the plan making process.</p>

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		The group were also informed of consultation at every stage.
National Grid Electricity Distribution (NGED)	<p>Meetings took place on the following dates:</p> <p>21/08/2024</p> <p>13/09/2024</p> <p>14/10/2024</p> <p>07/02/2025</p>	<p>The Council engaged with NGED to ensure that future planned development can be accounted for within their asset management cycles. This entailed the Council inputting into the DFES planning exercise on an annual basis and this will feed into the RII0-ED3 business plan.</p> <p>The council meet regularly with NGED to discuss any changes to their plans and submit their data to NGED annually so are assured that the work and investment taking place on the electricity network aligns with their plans.</p> <p>NGED also inputted into the Infrastructure Delivery Plan and have sent the Council a letter to confirm that the Duty has been met (Appendix 26).</p>