

# Integrated Impact Assessment for the Telford and Wrekin Local Plan (2020-2040)



## Non-Technical Summary

January 2025



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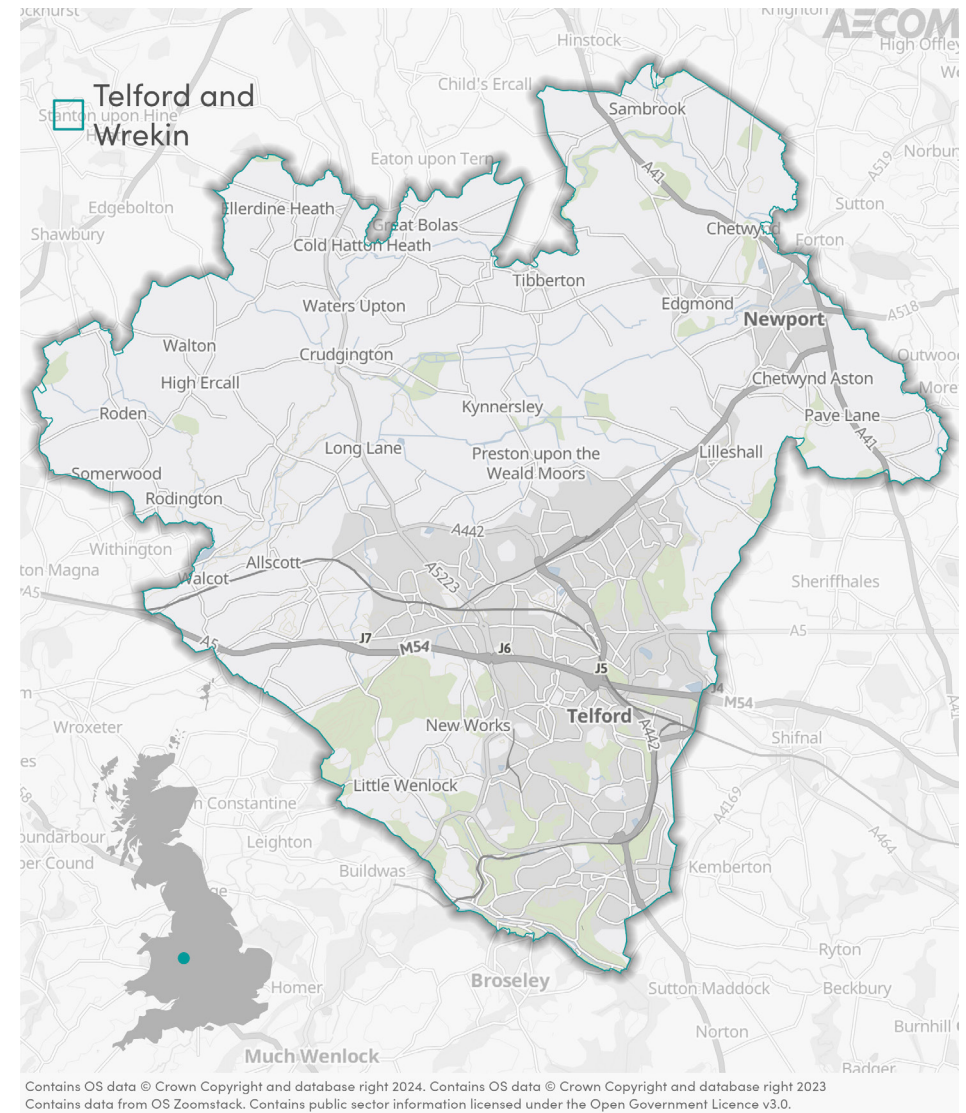
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# Introduction

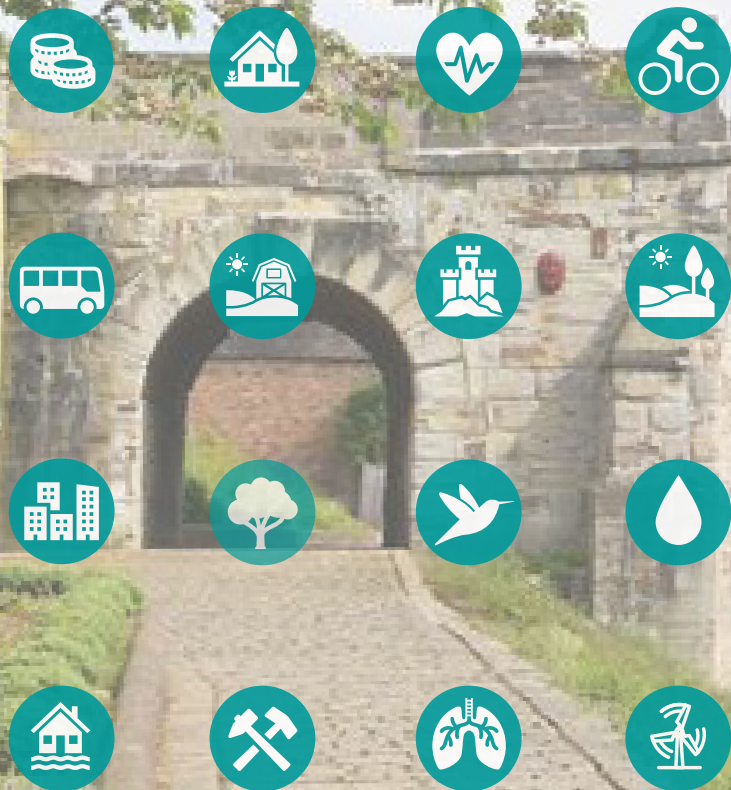
This is a non-technical summary document which concisely summarises the Integrated Impact Assessment for the Telford and Wrekin Local Plan review (2020-2040). This holistic approach to assessment combines Sustainability Appraisal/Strategic Environmental Assessment, Equalities Impact Assessment and Health Assessment into one compliant document. The Local Plan sets out the borough's spatial strategy in relation to housing and employment growth, with locally specific policies and site allocations which will help to shape the borough's built and natural environment. Once adopted, the Plan will replace the Telford and Wrekin Local Plan (2011-2031).

The Borough of Telford & Wrekin is located between the urban areas of Birmingham and the Black Country to the east and the rural areas of Shropshire and Wales to the west. Telford & Wrekin adjoins the administrative boundaries of Shropshire, South Staffordshire and Stafford Borough Councils.





# Scoping



## Process summary

A scoping exercise was carried out in order to establish the key sustainability issues and objectives for the plan area. The cross-cutting topics reflect broad areas of sustainability which could be significantly affected by the Telford and Wrekin Local Plan.

The sustainability topics which have been 'scoped in' for consideration within this Integrated Impact Assessment are detailed below.

## Integrated Impact Assessment Themes

- Biodiversity
- Air quality
- Water quality
- Soil and land
- Landscape
- Historic environment
- Waste
- Climate change adaptation
- Climate change mitigation
- Housing
- Health and wellbeing
- Economy and infrastructure
- Transportation

## Integrated Impact Assessment Framework

The scoping stage established the baseline position and policy context for the Integrated Impact Assessment. This helped to identify the key issues that should be the focus of the appraisal and the methodology that will be used to undertake the appraisal. These informed a framework which provided a way in which the sustainability effects of the Local Plan and alternatives could be identified and analysed based on a structured and consistent approach. The following information details the Integrated Impact Assessment objectives under each theme.

### Objectives

**Biodiversity** – Minimise, and avoid impacts upon biodiversity whilst achieving net gains through enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.

**Air Quality** – Protect and improve local air quality through implementing measures to reduce air pollution caused by road traffic and other sources in the borough.

**Water quality** – Promote sustainable forms of development which minimise pressure on water resources, whilst maintaining and enhancing the quality of the Borough's rivers, lakes and aquifers.

**Soil and land** - Promote the effective use of land and soil, ensuring that the best and most versatile agricultural land resources are protected and used effectively, whilst also preserving minerals resources.

**Landscape** - Protect and enhance the character of landscapes and townscapes; whilst ensuring their multifunctional use and enjoyment by all.

**Historic Environment** - Protect, maintain and enhance heritage assets (including their setting), cultural heritage and natural history.

**Waste** - Minimise waste generation and support the circular economy by implementing the waste hierarchy.

**Climate change adaptation** - Adapt and become more resilient to the impacts of climate change, including directing growth away from areas of highest flood risk and preparing for more extreme weather events.

**Climate change mitigation** - Facilitate and contribute to the move towards a zero carbon Telford and Wrekin whilst improving social equity of access to energy.

**Housing** - Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential of brownfield opportunities, to ensure delivery of high quality housing that meets the needs of Telford and Wrekin residents.



# Scoping

**Health and wellbeing** - Support healthy, safe lifestyles and environments for all community groups; whilst seeking to close 'inequality gaps' and improve resilience to health issues.

**Economy and infrastructure** - Ensure that the local economy is equipped to support key local industries which bring tangible benefits to the lives of local residents whilst ensuring environmental degradation is minimised and social equity is achieved.

**Transportation** - Ensure that provision of transport infrastructure reflects local population and demographic needs, promotes sustainable modes of travel, connects new housing to employment, education, health and local services and maximises accessibility for all.

**Equality and diversity** - Tackle inequalities, ensure that decisions do not disproportionately affect minority populations and that services can be accessed equally by all.





# Reasonable Alternative Growth Options

A key element of the Integrated Impact Assessment process was to explore different ways in which the objectives of the plan could be met. Whilst there are many different issues and options associated with a Local Plan, those which are at the heart of this Plan are those that were focused upon through the Integrated Impact Assessment process.

## Issues and Options stage

In order to remain proportionate and to provide added value, the Integrated Impact Assessment approached the Issues and Options stage by screening the issues and options presented by the Council. Not all of those detailed were deemed proportionate to test in terms of reasonable alternatives. Those which were deemed suitable to test, were included in the testing of scales and distributions of growth. These included:

- A strategy for housing growth and distribution
- A strategy for employment growth and distribution
- Appraisal of broad areas of growth
- Individual site appraisals



# Scale of housing growth



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## Scale of growth

Several stages of iterative appraisal helped to inform decision making in the Plan-making process. Appropriate scales of growth were evidenced by an Economic and Housing Development Needs Assessment which sought to identify locally relevant housing and employment needs over the Plan-period, and an analysis which looked at the objectively assessed housing need for the area. Not all of the scales of growth which were identified were considered to be reasonable. The key scales of growth which were considered to be reasonable, and hence tested, are detailed opposite, with factors influencing the options detailed below:

- A strategy for housing growth and distribution
- A strategy for employment growth and distribution
- Appraisal of broad areas of growth
- Individual site appraisals



Growth Scenario 1 : 16,960 dwellings  
(848 dpa)



Growth Scenario 2: 20,200 dwellings  
(1010 dpa)



Growth Scenario 3: 23,000 dwellings  
(1,150 dpa)



# Distribution of housing growth

## Considerations

In determining the reasonable distributions of growth options, considerations were given to the following factors:

Land supply

Settlement  
hierarchy

National  
Planning  
Policy  
Framework

Elements of the distribution of growth were considered for Telford, Newport and rural areas, as distinct settlement typologies. Throughout each approach, Telford would receive the significant majority of housing, aligning with its supporting infrastructure and investment.

## Strategic options

Distributions which were considered to be reasonable, focused on the following:

- Option 1: Maintain current strategy in the adopted Local Plan (this used a proportionate approach, relative to population splits across settlement types);
- Option 2: Increased growth in Rural Areas;
- Option 3: Increased growth in Newport;
- Option 4: Increased growth in Newport and Rural Areas.

It should be noted that options for a new, standalone settlement were explored, but constraints and a lack of opportunities meant that this was not deemed to be reasonable.





# Appraisal of options

Telford

Newport

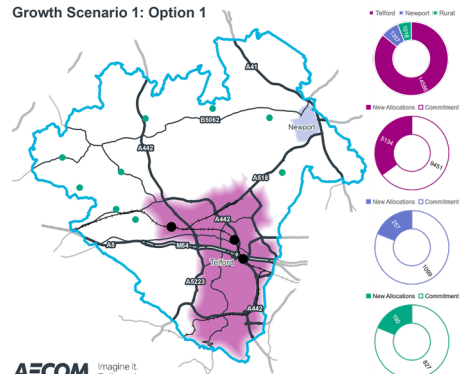
Rural areas

The below maps illustrate the distributions and scales of growth looked at in a non-site specific appraisal.



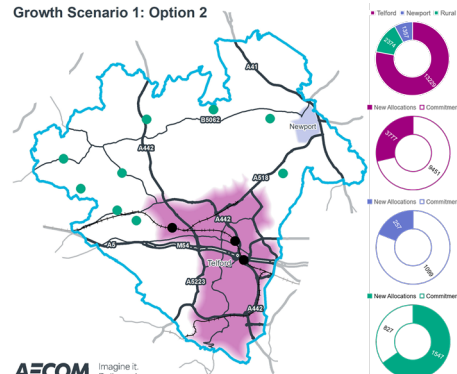
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Growth Scenario 1: Option 1



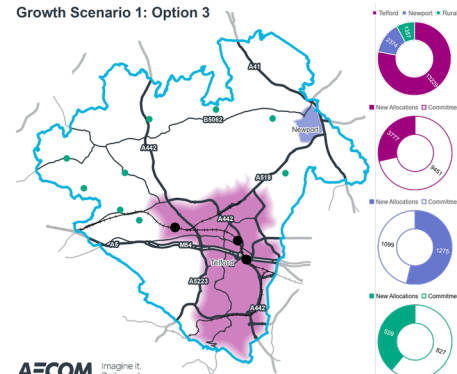
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Growth Scenario 1: Option 2



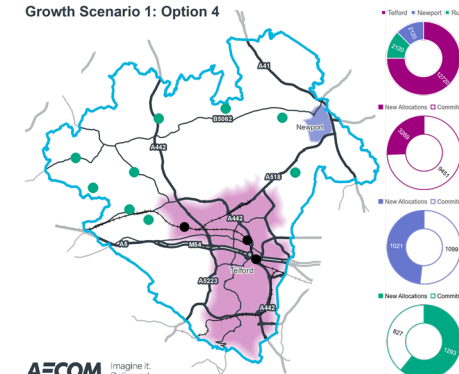
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Growth Scenario 1: Option 3



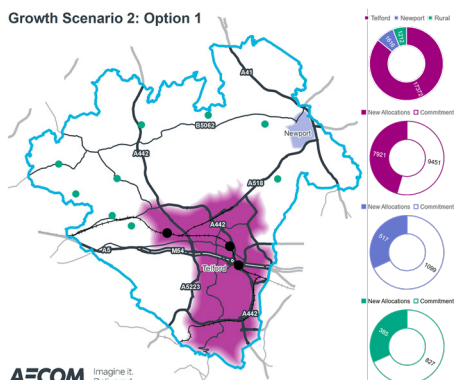
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Growth Scenario 1: Option 4



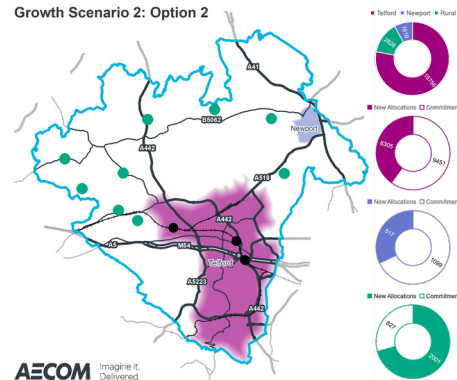
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Growth Scenario 2: Option 1



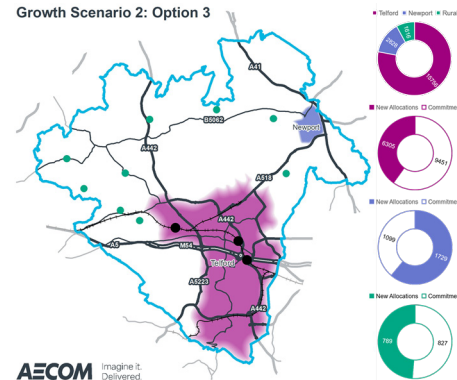
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Growth Scenario 2: Option 2



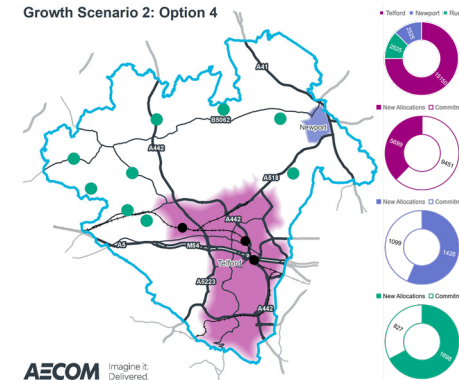
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Growth Scenario 2: Option 3



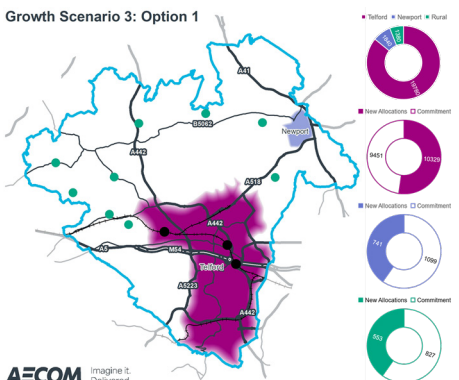
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Growth Scenario 2: Option 4



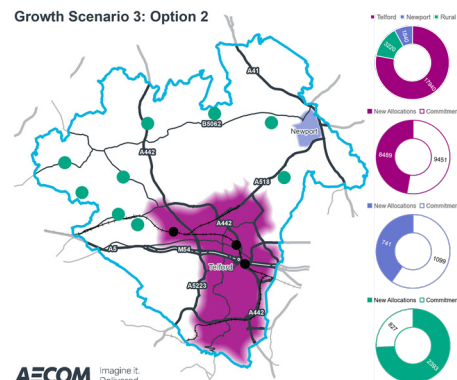
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Growth Scenario 3: Option 1



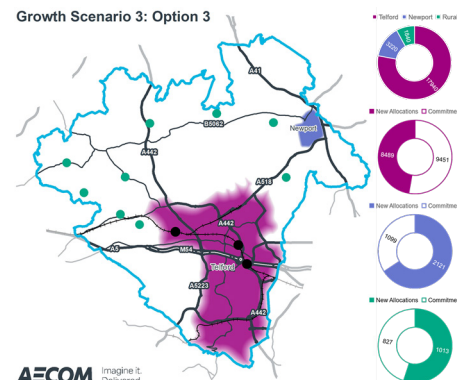
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Growth Scenario 3: Option 2



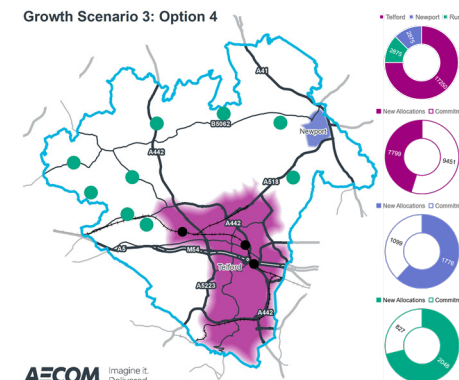
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Growth Scenario 3: Option 3



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Growth Scenario 3: Option 4

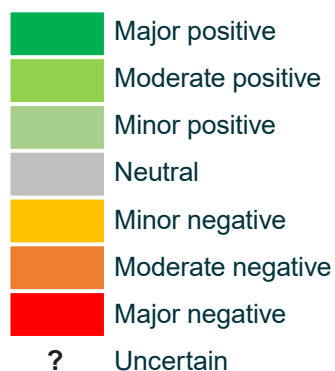


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# Appraisal Findings

At the draft Plan Regulation 18 stage, the Council consulted on a range of options in relation to sites, including three potential Sustainable Communities. Therefore, the final set of sites to help deliver the strategy was not determined until the Regulation 19 pre-submission version of the plan.

The distribution and growth options were appraised and the findings are presented opposite.



## Biodiversity

## Air quality

## Water resources

## Soil and land

## Landscape

## Historic Environment

## Waste

## Climate change resilience

## Climate change mitigation

## Housing

## Health and Wellbeing

## Economy and Infrastructure

## Transportation

## Equality and Diversity

	Growth Scenario 1				Growth Scenario 2				Growth Scenario 3			
	1.1	1.2	1.3	1.4	2.1	2.2	2.3	2.4	3.1	3.2	3.3	3.4
Biodiversity				?			?					?
Air quality					?							
Water resources	?	?	?	?	?				?	?	?	?
Soil and land												
Landscape									?			
Historic Environment					?		?				?	
Waste												
Climate change resilience									?			
Climate change mitigation				?						?		?
Housing				?				?	?			
Health and Wellbeing										?	?	?
Economy and Infrastructure								?	?			
Transportation												
Equality and Diversity					?		?			?	?	?

Broadly preferred option



# Reconsideration of housing options

The Council produced a Housing Technical Paper which informed the consideration of further growth options, considering Census updates and unmet need from the Black Country. The figure evidenced equated to 930 dpa of objectively assessed housing need. Considering this figure, plus a proposed 80 dpa to contribute towards the Black Country's unmet need, an annual need of 1,010 dwellings was identified. This aligned with the previously explored growth scale explored at the earlier stage, and evidenced by the Economic and Housing Development Needs Assessment and so it was deemed unreasonable to further explore this scale of growth.

Following consultation on the draft Plan Consultation Version (October 2023), changes to the NPPF and the standard methodology for calculating housing need were published. The new figure proposed for Telford and Wrekin following the NPPF changes (December 2024) was 857 dpa. This could be considered a reasonable alternative, but the IIA had already assessed a very similar level of growth (848 dpa) and so it was considered unnecessary to appraise any further growth options in this respect. Furthermore, the Telford and Wrekin Local Plan is being submitted under the 2023 version of the NPPF.



# Employment growth options

The Economic and Housing Development Needs Assessment informed the identification of alternative approaches to meeting the borough's employment needs. The report evidenced a need of between 167-189ha of employment land; the Council considered a supply buffer of 20% to be appropriate to allow for some flexibility in delivery. Considering this, the opposite scales of growth were tested.

In terms of the distribution of this need, constant elements of supply were identified (including committed development and suitable brownfield sites in urban areas); this totalled 101.5ha. Options to deliver the residual need were then explored, with reasonable site options forming the bottom-up component of these distribution options (as seen opposite).

167 hectares (plus  
20% supply buffer)

**Scale**  
Growth Scenario A :  
200 hectares

**Distribution**  
A1- Maximise Growth  
North of Telford and 'top  
up sites'

A2- Dispersed

A3- Dispersed

189 hectares (plus  
20% supply buffer)

**Scale**  
Growth Scenario B:  
227 hectares

**Distribution**  
B1- Maximise North Tel-  
ford plus Junction 6

B2- North Telford without  
J6

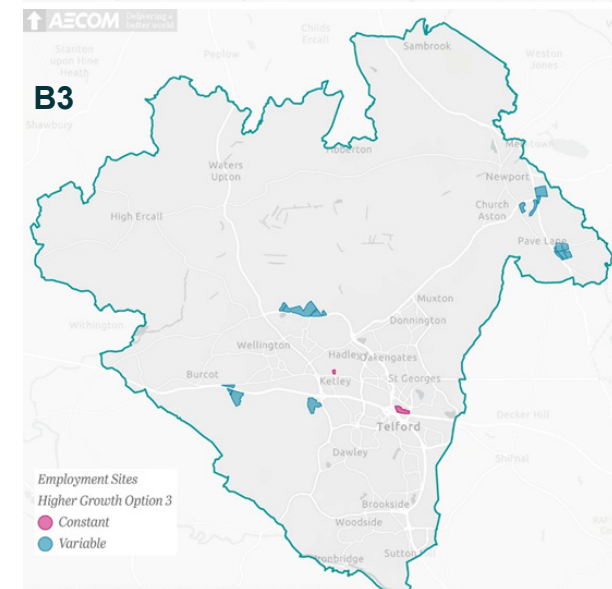
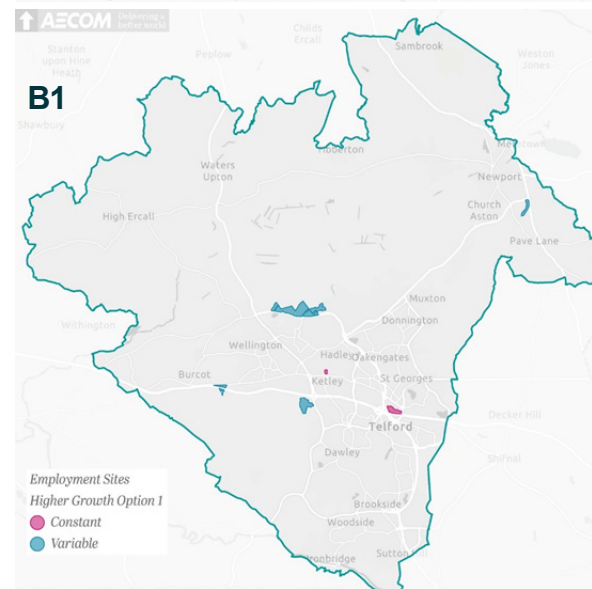
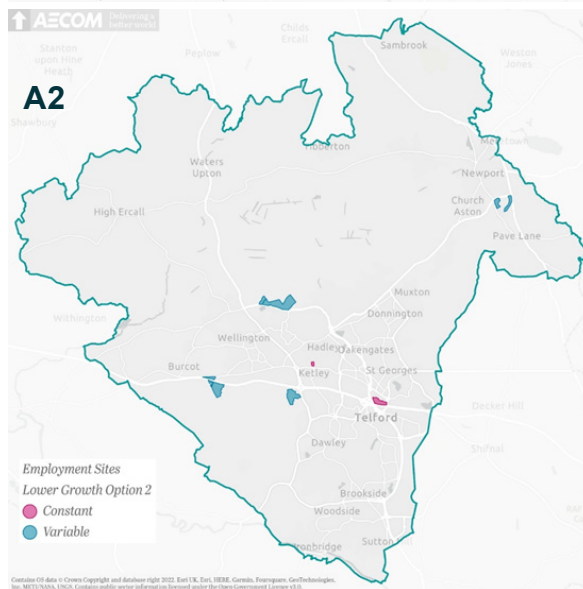
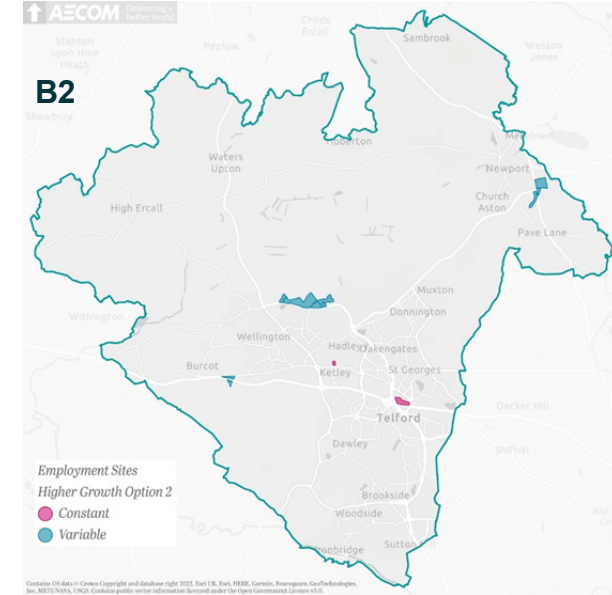
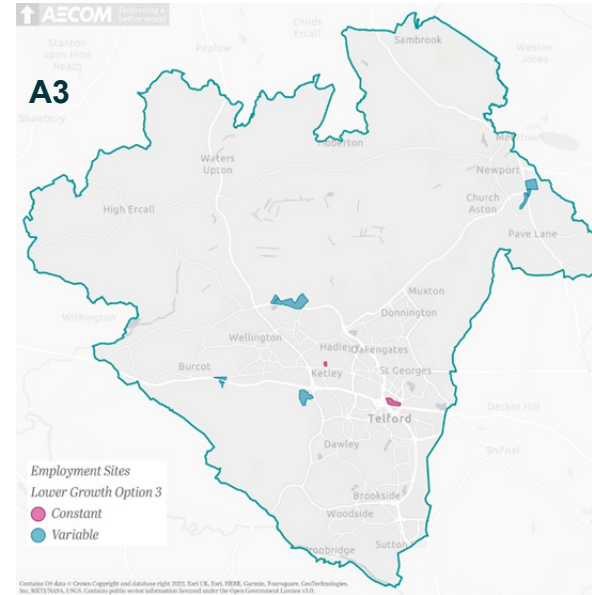
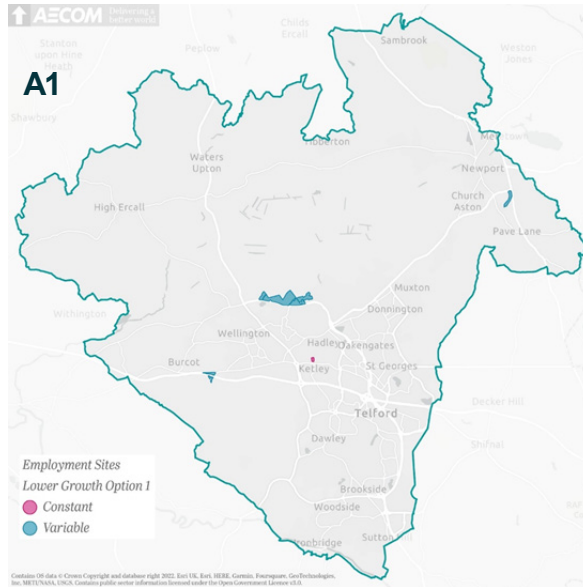
B3- Maximise growth  
elsewhere with remainder  
North of Telford





# Employment growth options

The below maps illustrate the distributions and scales of growth looked at in a site specific appraisal.



# Appraisal Findings

The distribution and growth options were appraised and the findings are presented opposite.

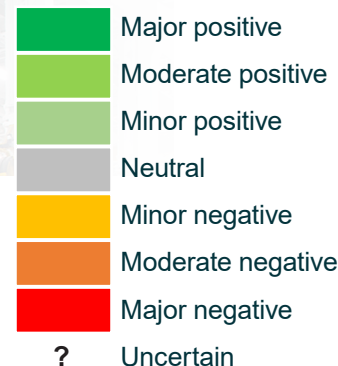
The Council have identified 167ha as its draft employment land requirement. The preferred strategy directs most new employment provision in Newport as well. This aligns most closely with Scenario A, Option 3, but is slightly different to take account of individual site conditions.

A mix of sites are allocated in Telford, with some directed at opportunity sites in the central areas and at Motorway Junctions, with the remainder being directed to the Sustainable Communities in the north, building upon existing economic growth locations. This will provide a balance of uses on these sites and accessible employment opportunities for future residents.

Delivering a higher scale of growth at Newport was discounted as an option, due to technical constraints on several sites that would make them unable to support development.

Employment growth at Cluddley was discounted as land was not available and / or was allocated for housing. Certain parcels of land in this location could have also had a significant impact on the national landscape and strategic landscapes within Telford and Wrekin.

A small number of rural sites were consulted on at the draft Local Plan stage to provide some level of diversification to the rural economy. However, these were discounted due to technical constraints that would make them unable to support development.

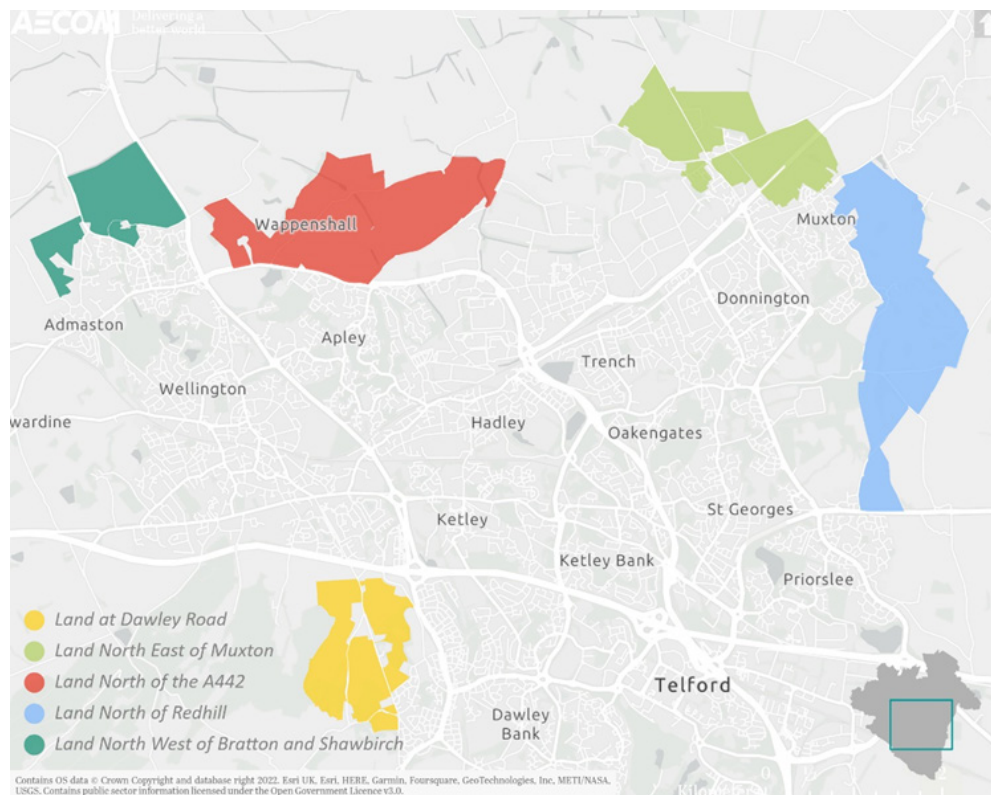


**Broadly preferred option**

	A1	A2	A3	B1	B2	B3
Biodiversity						
Air quality	?		?			
Water resources						
Soil and land						
Landscape						
Historic Environment	?		?			
Waste						
Climate change resilience	?	?	?	?	?	?
Climate change mitigation		?				
Housing						
Health and Wellbeing		?	?	?	?	?
Economy and Infrastructure						?
Transportation	?					
Equality and Diversity	?					

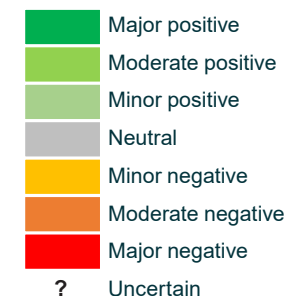


# Broad Areas of Growth Options



In order to understand the potential for delivering sustainable communities on Telford's periphery, a number of Broad Areas of Growth were identified (see below) and appraised as options for delivering strategic growth. The areas were identified by amalgamating large strategic sites on the urban periphery that sit within the same broad locations.

The options performed similarly for many of the themes, which is to be expected given that they are all large scale opportunities that can bring significant benefits in terms of housing delivery, infrastructure improvements, new facilities and services and the potential to deliver high quality sustainable design. The key differences relate to strategic environmental constraints, though it should be noted that mitigation and enhancement ought to be possible.



	Land at Dawley Road	Land NE of Muxton	Land North of the A442	Land North of Redhill	Land NW Bratton & Shawburch
<b>Biodiversity</b>				?	
<b>Air quality</b>	?		?		?
<b>Water resources</b>					?
<b>Soil and land</b>					
<b>Landscape</b>	?				
<b>Historic Environment</b>	?				?
<b>Waste</b>					
<b>Climate change resilience</b>	?	?	?	?	?
<b>Climate change mitigation</b>	?	?	?	?	?
<b>Housing</b>					
<b>Health and Wellbeing</b>					?
<b>Economy and Infrastructure</b>	?		?		
<b>Transportation</b>					
<b>Equality and Diversity</b>	?		?		



# Broad Areas of Growth Options

At the Regulation 18 stage of plan-making, the Council determined that strategic growth should form part of the spatial strategy (informed by appraisal of strategic options for growth).

Of the five locations tested, three were considered further as part of the Regulation 19 stage, and two locations were discounted. The three potential Sustainable Communities that were considered further as part of the Regulation 19 stage were:

- Land north west of Bratton and Shawbirch
- Land north of the A442
- Land north east of Muxton

At Regulation 19 stage, the Council made the decision to take forward all three sustainable communities at the locations detailed above. This was justified with the following rationale:

*"Telford is a maturing town, with land in the existing urban area reducing. To meet housing needs it is therefore necessary to look beyond the urban area at potential expansion sites. Of the five broad locations explored, the Council consider that three can be made into sustainable communities. The scale of growth directed to the three sustainable communities to the north of Telford will allow for new infrastructure to be provided that is needed for northern Telford. No further options have been promoted that could deliver a similar level of sustainable growth to the south, east or west of Telford (particularly when considering the multiple locations promoted to the North of Telford)."*





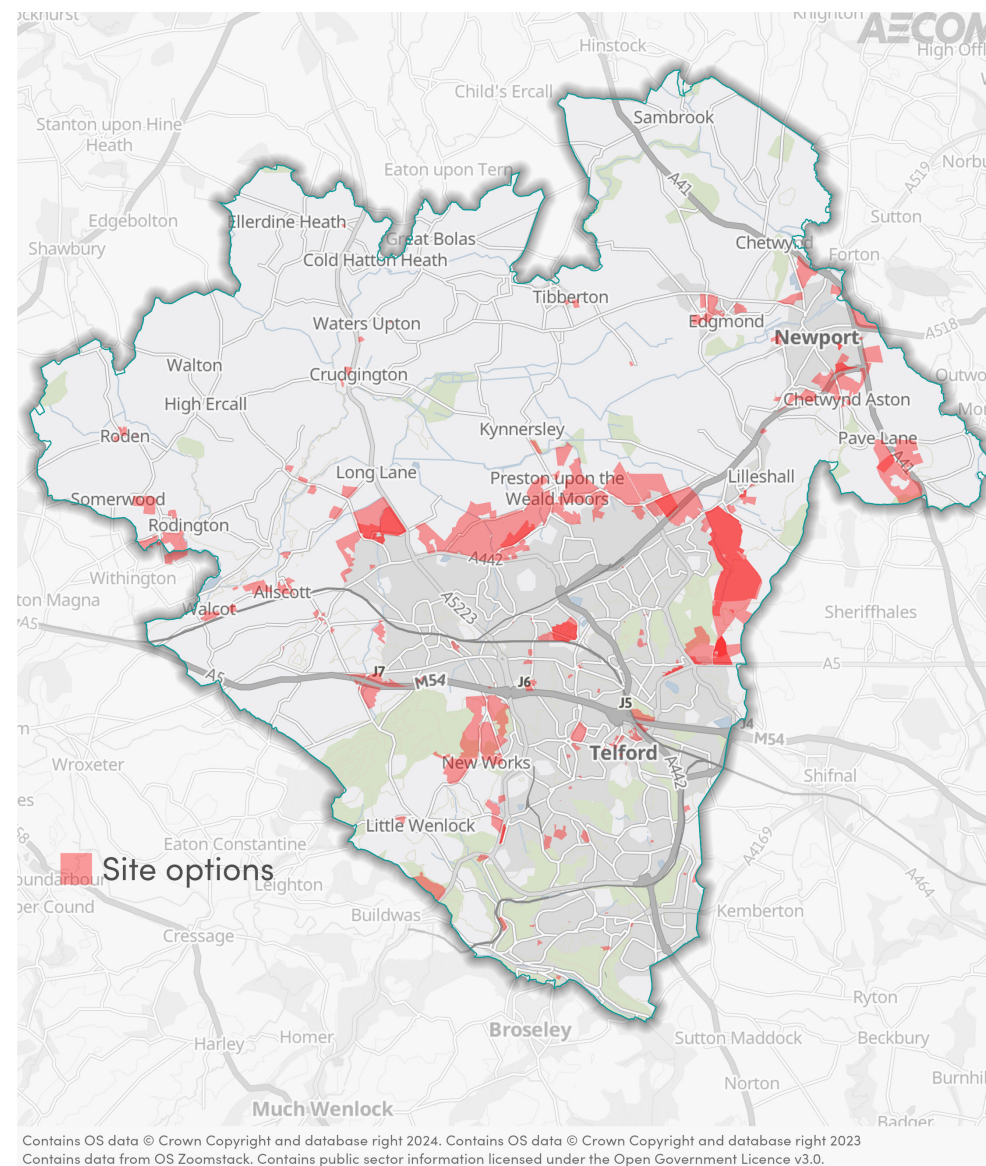
# Appraisal of sites

To help inform the appraisal of options as well as to aid the decision making process with regards to site allocations; all reasonable sites (shown opposite) were assessed at multiple stages throughout the Plan-making process. The methodology for assessing sites ensured a consistent approach was used to consider each individual site against a series of criteria which linked to the assessment framework and objectives.

Analysis broadly focused on a site and its spatial relationship to various environmental assets. This includes assessments focusing on:

- A site's proximity to or overlap with spatial designations or land uses (including social, economic and environment assets) (for example, areas at risk of flooding, land designated for its species or habitats or employment land).
- A site and its proximity to certain land uses by road distance (for example a school, train station or park); and
- A site and its qualitative relationship with its surroundings, including through views, local contextual factors and surrounding designations and assets (for example assets of historical significance or amenity related matters).

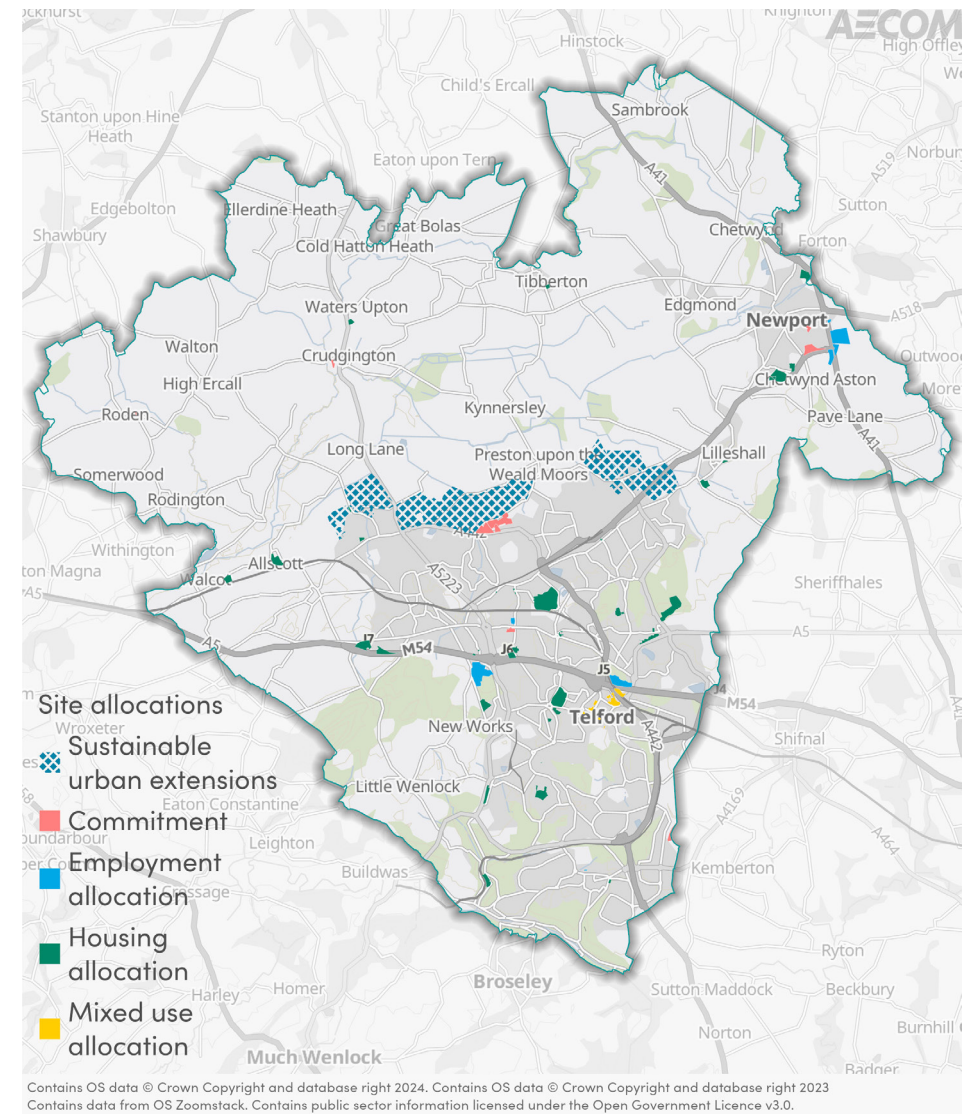
It is important to note that no individual site assessment result was considered to be of a significance which would rule out a site on one single criteria. All results should be read and interpreted in combination alongside the appraisal of packages of sites within options appraisals, which consider a range of qualitative and quantitative factors.





# Draft Plan Appraisal

The appraisal process considered the Plan 'as a whole' (i.e. the proposed strategy including the site allocations and all of the supporting policies that will shape future development). An interim draft Plan appraisal at Regulation 18 stage did not take account of specific site allocations. Updates to this were made for Regulation 19 stage, where site allocations were identified (see below). The findings are presented over the following page(s).





# Appraisal Findings

The Plan performs most favourably against socio-economic themes, linked to the delivery of housing and associated supporting social infrastructure. Other positive effects might be seen for biodiversity, linked to the requirement for net-gain, though the timeframe for realising these effects is uncertain.

The most significant negative effects are likely to come relating to the loss of greenfield land with agricultural value, under the soil and land

theme. Potential negative effects might be seen for air quality and transport, linked to the potential for transport and congestion nearby to larger areas of growth. Sensitivities with the historic environment and landscape may mean that the Plan could result in some minor negative effects.

## Summary of Plan Effects

Biodiversity	<u>Uncertain</u> Major positive effects	
Air quality	Minor negative effects	
Water resources	Minor positive effects	
Soil and land	Major negative effects	
Landscape	Minor negative effects	Minor positive effects
Historic Environment	<u>Uncertain</u> minor negative effects	
Waste	Minor positive effects	
Climate change resilience	Neutral / minor negative effects?	
Climate change mitigation	Minor positive effects	
Housing	<u>Major positive effects</u>	
Health and Wellbeing	Major positive effects	
Economy and Infrastructure	Major positive effects	
Transportation	Moderate positive effects	Minor negative effects
Equality and Diversity	Minor positive effects	





# Mitigation and Monitoring

## Mitigation and Enhancement

The Integrated Impact Assessment recommended potential mitigation and enhancement measures designed to reduce any potential adverse effects, and enhance any potential positive effects relating to the implementation of the Plan. This was carried out in an iterative manner throughout the Plan-making process. The degree to which measures were considered achievable depended on various factors, including the location and design of development, economic viability, national policy, funding availability and technical advancements.

### Regulation 19 (draft Plan) mitigation

At this stage, recommendations were made to the Council, who provided responses confirming that suggestions would be considered and taken account of in the Plan policies. Recommendations related to the following themes:

- Equality and diversity
- Health and wellbeing
- Biodiversity
- Soil and land
- Historic Environment
- Landscape
- Waste



# Monitoring

## Monitoring

There is a requirement to outline the measures envisaged to monitor the predicted effects of a Local Plan. In particular, there is a need to focus on the significant effects that are identified.

At the Regulation 18 stage, the monitoring measures were not finalised, as the Plan was still in draft form. There were still key decisions to make and the effects could have changed as the Plan moved towards submission stage. There was also a need to confirm the feasibility of collecting information for the proposed measures.

The monitoring measures will be finalised once the Plan is adopted and will be set out in an Integrated Impact Assessment Statement in accordance with the SEA Regulations.

## Next steps

This Integrated Impact Assessment Report was prepared to accompany the Regulation 19 version of the Telford and Wrekin Local Plan. The report draws together all the Integrated Impact Assessment outputs that have been prepared to date.

Regulation 19 Consultation will focus on the soundness of the Plan, rather than the direction it should take and the issues it should focus on.

The final Plan will be 'Submitted' for Examination in Public (EiP). The Council will also submit a summary of issues raised (if any) through representations at the Publication stage so that these can be considered by the Government appointed Planning Inspector who will oversee the EiP. At the end of the EiP, the Inspector will judge whether or not the Plan is 'sound'.

Further IIA work may be required to support the Plan-making process as it moves through Examination (for example the preparation of IIA Addendums to deal with changes / modifications).



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