

Telford and Wrekin Local Plan Examination

Initial Questions from the Inspectors

We have commenced the examination of the Plan. We intend to issue our Matters, Issues and Questions (MIQs) in November, but before we do we have some initial questions to put to the Council. The answers to these will help us frame our MIQs.

If the Council could respond to these initial questions promptly that would help with the timely issuing of the MIQs. It would be helpful for the Council to indicate to the Programme Officer when it would be able to respond to these Initial Questions. The response can be in stages if that helps. The issuing of these questions does not preclude us from asking any additional initial questions if we consider that necessary.

1 Clarification around suggested modifications

- a) The Council has set out a number of what it calls ‘minor modifications’ to the Plan. These are set out in a table appended to the Regulation 22 Consultation Statement and contained within the Submission version of the Plan. We are presuming that these suggested modifications have not been the subject of any public consultation nor been subject to sustainability appraisal or HRA. Can the Council please confirm?
- b) Assuming that they have not been subject to consultation, the ‘minor modifications’ have no status other than the Council inviting us to consider them. We shall refer to these during the examination as the Council’s ‘Suggested Modifications’. The Plan to be examined is the Publication version of the Plan, rather than the Submission version. We shall use the Submission Plan as a guide and an expression of what the Plan would look like with the Council’s suggested modifications incorporated.
- c) For clarity, can the Council please list all the documents that were published for consultation at Regulation 19 stage alongside the Publication version of the Plan.

2 The Plan period

- a) One of the suggested modifications is to move the end date back one year to 2041. However, MOD010 refers to the Plan period changing to 2021-2040 whereas MOD002 refers to just moving back the end date. Table 4 of the Submission version of the Plan shows a changed end date but still has a start date of 2020. Can the Council clarify what it is suggesting to us?
- b) It would be helpful to have a document which clearly sets out the implications of adjusting the Plan period particularly in terms of housing requirement and supply, and employment land requirement and supply. Can the Council please prepare a brief paper on this and refer in it to existing evidence base documents? This paper will then help inform the statements which will be prepared in response to the MIQs.

3 Unmet need

- a) Policy Strategic S4 (3) refers to an 'offer' of 153 dwellings per year as a contribution to unmet needs of the Black Country Authorities. Can the Council explain what is meant by 'offer' and point us to any the evidence beyond that in the Housing Delivery Topic Paper (HDTP) , which has led to the calculation of this figure? For example, Paragraph 3.8 refers to a review by the Council of migration patterns based on ONS mid 2022 estimates. Is this review in the examination library?
- b) Paragraph 3.8 of the HDTP also states that the 153 per annum figure has been 'agreed'. Who has this figure been agreed with?

4 Housing Supply

- a) The Housing Supply information in the Housing Delivery Topic Paper is based on actual completion data from the start of the Plan period to 31 March 2024. When is completion/permission data for the 24/25 period likely to be available?

5 Gypsies and Travellers

- a) The Gypsy and Traveller and Traveller Showperson Accommodation Assessment (GTAA) is dated October 2023. This predates the changes to the definition of Gypsies and Travellers in Planning Policy for Traveller Sites (PPTS) made in both December 2023 and December 2024. The definition now includes "all other persons with a cultural tradition of nomadism or of living in a caravan". What are the implications of this current definition for the identification of need in the GTAA?

6 Site Allocations

- a) Policy HO1 refers to the housing allocations which are listed in Appendix A. It also lists a number of criteria which would apply to planning applications for major housing sites. Is the Council satisfied that there are no site-specific requirements for the allocations listed in Appendix A other than the general criteria in Policy HO1?
- b) Is the Council satisfied that there are no site-specific requirements for the employment allocations listed in Appendix B, or the mixed-use allocations in Appendix C?

7 Employment Land

- a) Para 4.34 under Strategic Policy S3 refers to 119ha existing supply and allocation of a minimum of 100ha new employment land. Where do these figures come from? How do they relate to the 'components of supply' at para 5.4 of the employment land delivery topic paper?
- b) Policy EC1 refers to 'existing allocations carried forward' but these do not appear to be named or listed in the Plan, other than a reference to 'E28' under Sustainable Community SC3. The Policies Map shows 'employment sites carried forward', but with no numbering. What are these allocations/sites and what is their status in the development plan?
- c) Where are the 13.2ha of employment land from existing permissions within the Borough, listed under components of supply in the topic paper? What is the status of these

permissions? What if any overlap is there between these sites with permission and the Strategic Employment Areas and/or existing or proposed allocations and/or the employment land envisaged within Sustainable Communities?

8 Town Centres

- a) What is the scale and type of town centre development (including for retail and leisure) likely to be needed, looking at least ten years ahead? Where in the evidence is this set out? What is the strategy to meet this need and where is this set out?

9 Heritage

- a) We understand the Council has commissioned a Heritage Impact Assessment in response to comments from Historic England. When is this expected to be completed and added to the examination library?

10 Flood risk

- b) Planning Practice Guidance on flood risk was amended on 17 September 2025. Does the amended guidance have implications for the Plan and its evidence base? If so, what are they?

11 Neighbourhood Plans

- a) Figure 3 of the Plan shows that there are 8 Neighbourhood Plans with the area of the Local Plan. It appears from the Council website that a Neighbourhood Plan for Stirchley and Brookside has not been made. Can the Council confirm that this plan has been abandoned? Can the Council also confirm that no Neighbourhood Plans are currently in preparation?

12 Monitoring

- a) The Plan does not include a Monitoring Framework. How does the Council intend to monitor the effectiveness of the Plan?

13 Superseded policies

- a) Does the Plan identify the policies in the adopted development plan that are intended to be superseded by policies in the Plan and state that fact as required by Regulation 8(5)?

Mike Worden and Catherine Carpenter

INSPECTORS

21 October 2025