

Telford & Wrekin Council

Council responses to Inspectors' Initial Questions

Date: 07/11/25

1 Clarification around suggested modifications

- a) The Council can confirm that the 'minor modifications' appended to the Regulation 22 Statement and contained in the Submission version of the Plan have not been subject to public consultation and have not been subject to sustainability appraisal or HRA.
- b) As a result of the Regulation 19 stage consultation comments received, the intention of the Council was to provide 'Suggested Modifications' to help the Inspectors' in the Examination process. The approach set out by the Inspectors' is noted and welcomed.
- c) The list of documents published for consultation at Regulation 19 stage is appended to this letter (see Annex A).

2 The Plan period

- a) The intention is to move the plan period from 2020 – 2040 to 2021 – 2041. Following Governments consultation and adoption of the NPPF we delayed the Regulation 19 stage of the Local Plan to enable the Regulation 19 Version of the Plan to be examined under the December 2024 version of the NPPF. Following the Regulation 19 consultation the Council recognised the requirement to have 15 years from the adoption of the plan and has therefore suggested a modification to address this, through moving the dates to 2021-2041.
- b) A short paper has been produced which addresses the change in dates (See Annex B).

3 Unmet need

- a) The Council can confirm that the term 'offer' should read 'contribution' towards the unmet needs of the Black Country Local Planning Authorities in line with their request for support. To help establish an appropriate contribution a review of migration patterns was undertaken. Document EH01 – Telford and Wrekin, Economic and Housing Development Need Assessment paragraphs 3.55 – 3.62 discusses the relationship between migration trends and requests to accommodate unmet housing need. Further to this the data underpinning the assessment of out migration patterns has been included with this response (See Annex C).
- b) For clarity the Publication version of the Local Plan has been through the Councils Cabinet and Full Council which included the contribution of 153 units per annum figure. Prior to the Publication version of the Plan going to Cabinet the Council wrote to the Black Country LPAs on 4 February 2025 (See Annex D) setting out the intention to include a contribution of 153 units per annum in the Plan. The Council then wrote out to Black Country LPAs to reconfirm the contribution of a 153 units, as set out in the Publication version of the Local Plan, on 18 August 2025 in advance of submission of the Local Plan. Subsequent to that the Black Country LPAs have all written back to confirm they welcome and accept the positive contribution towards their unmet needs (see SC01a – Telford and Wrekin Local Plan Duty to Cooperate Statement Appendices).

4 Housing supply

- a) Officers are in the process of collecting completions data from housing developers for 2024/25. It is anticipated that this data will be available by the end of November. New permissions for

2024/25 have been included within the trajectory set out in Appendix 1 of document TP01 – Telford and Wrekin Housing Delivery Topic Paper.

5 Gypsies and Travellers

- a) The Council sought further advice regarding this question from Arc 4 consultants who produced the GTAA document for the Council, they confirmed the following;

“The Telford and Wrekin Gypsy and Traveller Accommodation Assessment was published in October 2023 and therefore before the changes in definition set out in the December 2024 Planning Policy for Traveller Sites.

However, arc4 were always concerned that the PPTS ‘nomadic habit of life’ test set out in the PPTS 2015 was divisive and did not sufficiently reflect the residential traditions of Traveller Communities. Therefore, in all of our GTAA’s an overall ‘cultural’ need was assessed. This related to all households living on Gypsy and Traveller pitches, whether or not they met the nomadic habit of life test, which corresponded with the definitions set out in the previous 2012 PPTS.

Therefore, the GTAA provided an assessment which was comparable to the new 2024 PPTS definition. This identified an overall need of 49 pitches over the plan period 2021/22 to 2039/40 and after considering anticipated turnover on council pitches, the residual need for new residential pitches was 26.

Note that following the publication of the PPTS 2024, the method of engaging with households living on pitches and analysis of need remains the same to that employed in the Telford and Wrekin GTAA 2023. The GTAA therefore continues to provide a sound basis for assessing future pitch need across Telford and Wrekin.”

6 Site Allocations

- a) The Council are satisfied that there are no site specific requirements for the allocations listed in Appendix A other than the general criteria in Policy HO1. This approach follows the current adopted Local Plan where detailed technical matters are dealt with at the application stage.
- b) The Council are satisfied that there are no site-specific requirements for employment allocations listed in Appendix B or the mixed-use allocations listed in Appendix C. This approach follows the current adopted Local Plan where detailed technical matters are dealt with at the application stage.

7 Employment Land

- a) The difference between the 219 ha previously reported and the 172.5 ha now identified arises from the change in monitoring base year and updated classification of sites. Between 2020 and 2022, a number of sites were completed and have therefore been removed from the remaining supply. Commenced remain within the updated figures where they continue to represent live permissions forming part of the 13.2 ha of employment land with planning permission. In addition, some long-standing allocations within the Strategic Employment Areas have been consolidated to avoid double counting with new allocations. There have been no methodological changes in the way supply is calculated.
- b) There are 8 employment allocations set out in the policies map to be carried forward, that are contained within the existing adopted Local Plan. They are all located within the urban boundary of Telford. For clarity the Council has produced a schedule and plan of sites (See Annex E) and can, if required, include reference numbers for sites on the policies map.

- c) The 13.2ha of employment land from existing permissions are located across a range of sites in the borough. These are 'live' permissions and are primarily contained within the existing Strategic Employment Areas. The Council can confirm that there are no overlaps with proposed allocations or the employment land envisaged for the Sustainable Communities.

8 Town Centres

- a) The Local Plan sets out a robust set of development management policies that will help guide town centre development. The Local Plan provides a flexible framework which can support the redevelopment of the Telford Town Centre area. It should also be noted that Telford Shopping Centre is within a single ownership and therefore development can be co-ordinated. The Council has not procured evidence regards retail and leisure provision due to the changing nature of those markets.

9 Heritage

- a) The Council have submitted the Heritage Impact Assessment with this response.

10 Flood risk

- a) The Planning Policy Guidance now states that the Sequential Test is not required to consider surface water flooding if it can be shown a development can be made safe from surface water flooding for its lifetime without impacting on flood risk elsewhere. Therefore, on the basis that this can be demonstrated within a site-specific Flood Risk Assessment, there will no longer be a requirement to consider the Sequential Test for surface water at the allocations stage of plan making. Sites at risk of both fluvial and surface water flooding will still need to be subject to the Sequential Test which is addressed in the Sequential Test document this can be found in the examination library as WF04 – Telford and Wrekin Sequential and Exception Test Paper.

11 Neighbourhood Plans

- a) Stirchley and Brookside is a designated Neighbourhood Plan area. It is the Council's understanding that once an area has been designated there is no set time limit for a Neighbourhood Plan to be submitted to the Council. In this case the Parish has not yet submitted a Neighbourhood Development Plan to the Council. The area designation should still stand unless the Parish Council ask for this to be removed.

12 Monitoring

- a) The Council intend to monitor progress of the plan through the production of Annual Monitoring Reports (AMRs) which capture data in relation to the levels of development across the borough. The Council are in the process of finalising a schedule of indicators which could be included as an annex to the plan. It is anticipated that the schedule will be available by the end of November.

13 Superseded policies

- a) The Council would point to the Annex G key policy changes, within Publication Version of the Plan which identifies; 1) new policies, 2) policies that have been updated and 3) where there has been no material changes to existing policies. This annex can be reviewed subject to any modifications suggested by the Inspectors.

Annex A - Telford and Wrekin Local Plan review – document consulted on at Regulation 19

Core Documents

NB: we have put in the reference ID for ease of referring back to the Examination Library

CD01 - Telford and Wrekin Local Plan Review - Publication Version - February 2025

CD02 - Telford and Wrekin Local Plan Policies Map – Borough wide - March 2025

CD03 - Telford and Wrekin Local Plan Policies Map – Telford - March 2025

CD04 - Telford and Wrekin Integrated Impact Assessment Non-Technical summary - January 2025

CD05 - Telford and Wrekin Habitat Regulation Assessment - February 2025

CD06 - Telford and Wrekin Integrated Impact Assessment Report - December 2024

CD12 - Telford and Wrekin Local Development Scheme - January 2025

CD13 - Telford and Wrekin Statement of Community Involvement - January 2025

NB: CD12 and CD13 were adopted through Cabinet in February 2025 and were both available during Reg 19 consultation

VS01- Telford and Wrekin Local Plan Review Viability Study - October 2023

VS01a - Telford and Wrekin Local Plan Review Viability Study – Appendix - October 2023

VS02 - Telford and Wrekin Local Plan Review Viability Study - Update Note - December 2024

PD07 - Telford and Wrekin Regulation 18 Consultation Statement - March 2025

PD08 - Telford and Wrekin Schedule of Proposed Changes to Policies Map - March 2025

Economy and Housing

TP06 - Telford and Wrekin Minerals - Topic Paper – February 2025 (updated for submission September 2025)

EH01 - Telford and Wrekin Economic and Housing Development Need Assessment (EHDNA) - February 2025

EH01a - Telford and Wrekin EHDNA - Appendix 1 - Demographic and Housing Needs Modelling - February 2025

EH01b - Telford and Wrekin EHDNA - Appendix 1 - Parish Council Questionnaire - February 2025

EH01c - Telford and Wrekin EHDNA - Appendix 2 - Housing and Demographics Report - September 2020

EH01d - Telford and Wrekin EHDNA - Appendix 2 - Older Persons Housing Needs Assessment - February 2025

EH02 - Telford and Wrekin Rural Settlements Technical Paper - March 2025

EH03 Telford and Wrekin Economic and Housing Development Needs Assessment Part 1
October 2020

EH03a - Telford and Wrekin Economic and Housing Development Needs Assessment Part 2 - October
2020

EH04 - Telford and Wrekin Assessment of Affordable Housing Needs and Housing Mix - October 2023

EH05 - Telford and Wrekin Housing Requirement Technical Paper - October 2023

EH06 - Telford and Wrekin Newport Employment Land Need Study - October 2024

EH07 - Telford and Wrekin Gypsy and Traveller and Travelling Showperson Accommodation
Assessment (GTAA) - October 2023

EH08 - Telford and Wrekin Town and District Centres Boundary Review - October 2023

EH09 - Telford & Wrekin Council Annual Monitoring Report - March 2025

WM03 - Shropshire and Telford Local Area Aggregates Assessment 2019 - May 2019

Landscape and Ecology

NC01 Telford and Wrekin Green Space Factor Study June 2023

NC02 Telford and Wrekin Landscape Capacity Assessment September 2023

NC03 Telford and Wrekin Borough Landscape Character Assessment October 2023

NC04 - Telford and Wrekin Borough Landscape Designations Review - September 2023

NC05 - Telford and Wrekin Play, Recreation and Open Space Needs Assessment - June 2023

NC06 - Telford and Wrekin Landscape and Visual Sensitivity Assessment - August 2020

NC06a - Telford and Wrekin Landscape and Visual Sensitivity Assessment - Telford - November 2020

NC06b - Telford and Wrekin Landscape and Visual Sensitivity Assessment – Newport - November
2020

NC06c - Telford and Wrekin Landscape and Visual Sensitivity Assessment – Lilleshall - November
2020

NC06d - Telford and Wrekin Landscape and Visual Sensitivity Assessment – Edgmond - November
2020

NC06e - Telford and Wrekin Landscape and Visual Sensitivity Assessment – Tibberton - November
2020

NC06f - Telford and Wrekin Landscape and Visual Sensitivity Assessment - Waters Upton - November
2020

NC06g - Telford and Wrekin Landscape and Visual Sensitivity Assessment - High Ercall - November
2020

NC06h - Telford and Wrekin Landscape and Visual Sensitivity Assessment – Roden - November 2020

NC06i - Telford and Wrekin Landscape and Visual Sensitivity Assessment - Rodington and Rodington Heath - November 2020

NC06j - Telford and Wrekin Landscape and Visual Sensitivity Assessment – Walcott - November 2020

NC06k - Telford and Wrekin Landscape and Visual Sensitivity Assessment – Allscott - November 2020

Infrastructure

IS01 - Telford and Wrekin Infrastructure Delivery Plan - March 2025

IS02 - Telford and Wrekin Facilities Planning Model Assessment of Swimming Pools - July 2024

IS03 - Telford and Wrekin Facilities Planning Model Assessment of Sports Halls - July 2024

IS04 - Telford and Wrekin Traffic Modelling Report - March 2025

IS05 - Telford Growth Strategy Refresh - March 2025

IS08 - Telford and Wrekin Transport Analysis (SWOT) - December 2023

WM02 - Telford and Wrekin Waste Arising Study - December 2024

WF01 - Telford and Wrekin Level 1 Strategic Flood Risk Assessment Report (SFRA) - October 2021

WF01a - SFRA L1 Appendix A – Maps - October 2021

WF01b - SFRA L1 Appendix B - Data Sources - October 2021

WF01c - SFRA L1 Appendix C - SFRA User Guide - October 2021

WF01d - SFRA L1 Appendix D - Flood Warning and Flood Alert Areas - October 2021

WF01e - SFRA L1 Appendix E - Flood Risk Summary - October 2021

WF02 - Telford and Wrekin Level 2 Strategic Flood Risk Assessment Report (SFRA) - January 2025

WF02a - SFRA L2 - Site Summary Tables - January 2025

WF02b - SFRA L2 - Screening Spreadsheet - January 2025

WF02c - SFRA L2 Appendix A – Maps - January 2025

WF04 - Telford and Wrekin Sequential and Exception Test Paper - March 2025

WF05 - Telford and Wrekin Stage 1 Scoping Water Cycle Study - July 2021

WF06 - Telford and Wrekin Water Cycle Study Phase 2 - February 2025

TP08 - Telford and Wrekin Waste - Topic Paper - March 2025

Site Allocations

AS01 - Telford and Wrekin Site Selection Technical Paper - March 2025

AS02 - Telford and Wrekin Housing Allocations - Site Assessments - April 2025

AS03 - Telford and Wrekin Employment Allocations - Site Assessments - April 2025

AS04 - Telford and Wrekin Mixed Use Allocations - Site Assessments - April 2025

Annex B – DLP Paper (pdf attached)

Annex C – Assessment of Out Migration (pdf attached)

Annex D – DTC letter 04.02.25 (pdf attached)

Annex E – Schedule and plan of employment allocations carried forward

Site Ref	Site Name	Site Size
E7	Hortonwood 35	0.86
E8	Hortonwood 50	1.39
E9	Hortonwood 60	3.39
E14	Land at Telford International Rail freight Terminal	2.48
E16	Dear Park Court	2.74
E17	Telford Way	3.13
E23	Halesfield 24	1.97
E25	Halesfield 15	1.46

