

## Telford & Wrekin Council – Responses to Matters, Issues and Questions

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#### Matter 2, Issue 1

##### **B SOUNDNESS**

###### **Matter 2 – Vision, Priorities and Development Strategy**

**Issue 1: Have the vision, priorities and development strategy been positively prepared, are they justified and consistent with national policy, and can all be realistically achieved?**

Q19. Does the Plan set out an appropriate vision for the Borough based upon the evidence?

Yes, the plan sets out an appropriate and aspirational vision for the borough based on a broad range of evidence in line with paragraph 15 of the NPPF. The vision for the borough clarifies the purpose of the Local Plan (paragraph 3.1 CD01) in helping to protect, care and invest in sustainable development, whilst enhancing residents' lives, the quality of the natural environment and attracting new inward investment to support economic growth.

The vision goes further (paragraph 3.2 CD01) in explaining the type of place the borough aspires to be with a focus on six areas that cover; the natural environment, climate change, focussing development in sustainable locations, meeting the housing needs of residents, attracting inward investment and the role of the Council, residents and stakeholders as custodians of the boroughs historic assets.

Q20. What does 'a Forest Community' mean?

The Council recognises the plan could be improved by including a definition of 'a Forest Community', therefore the following definition has been included as a suggested modifications in document CD08 – *'Forest Community: Telford is a town set within the landscape which is defined by extensive tree planting. As a 'Forest Community' this approach will be maintained across new areas of development with a strong emphasis on the retention and provision of green infrastructure as set out the policies within the Plan to help create vibrant communities that are well adapted to climate change.'*

Q21. Are the vision, priorities and the development strategy justified, have they been positively prepared, and do they accord with the evidence and national policy?

The vision, priorities and development strategy are justified and have been positively prepared, they accord with the evidence base for the plan and national policy.

The plan is justified and provides an appropriate strategy for the development of the borough that is broadly in line with the existing adopted Local Plan. Reasonable alternatives were considered as detailed in the Integrated Impact Assessment report (CD06).

The positive preparation of the plan can be demonstrated by its alignment with paragraph 16 in the NPPF (points a to f). The vision, priorities and strategy clearly set out the Council's ambition for sustainable development, with climate change and natural environment being key elements of the vision and priorities, that is aspirational and deliverable. This is evidenced by the plan seeking to meet the areas development needs in full and provide a sustainable contribution toward the development needs of other LPAs (paragraph 26 and 36a of NPPF).

The plan was shaped by early, proportionate and effective engagement with the public, stakeholders and duty to cooperate bodies throughout the plan making process as outlined in the Regulation 22 Statement (CD07). The plan contains policies that are clearly written and unambiguous to aid preparation of development proposals and decision making. The Council has recognised that some modifications to policies (following the Regulation 19 consultation) may help improve the plan as set out in the Submission Version of the Plan (CD08) and schedule of 'suggested modifications' in appendix H of document CD07. The Council used digital tools when making the plan and associated materials available via a dedicated website ([telfordandwrekinglocalplan.co.uk](http://telfordandwrekinglocalplan.co.uk)) as well as making documents available in hard copy form and carrying out public engagement sessions at the draft plan stage.

The Local Plan is also in line with paragraph 86 of the NPPF providing a clear vision and strategy that will positively and proactively help to deliver sustainable economic growth through the allocation of a range of employment land allocations in the borough and a strong employment policy framework.

Q22. Has the development strategy been fully informed by the SA and other evidence? Is it soundly based?

The IIA (CD06) (which incorporates SA) has been undertaken in tandem with the plan-making process and has informed decisions relating to strategy, site allocations and policy content.

Our answer to question 7 (Matter 1, Issue 2) sets out how the IIA has been used to inform the Plan and choice of development strategy.

Our answer to question 23 below also sets out other key pieces of evidence that were used to inform the development strategy (through the testing of options and reasonable alternatives).

The strategy is soundly based and has been driven by the need to address objectively assessed development and infrastructure needs. This has included consideration of alternative levels of housing and employment growth in the EHDNA

(EH01 and EH03) and consideration of alternative distribution scenarios in the IIA (CD06). The evidence base is robust and proportionate and demonstrates that the strategy is deliverable.

Q23. Have reasonable alternatives been considered and clearly discounted on the evidence?

The IIA (CD06) explores reasonable alternatives thoroughly and robustly. The response to question 5 outlines how reasonable alternatives have been identified, appraised and discounted / taken forward in the context of the IIA. To reiterate, alternatives were considered for a range of policy measures, identifying which were those that needed to be explored as key elements at the 'heart of the plan'. This included reasonable alternatives for housing strategy, employment strategy, 'sustainable communities' and individual site options.

Reasons for selecting or discounting reasonable alternatives must only be provided in 'outline terms' in the IIA, and this is evidenced at Section 5.5 (housing strategy), Section 6.3 (employment strategy) and section 7.4 (sustainable communities).

Additional rationale and justification for selecting or discounting alternatives is provided in a range of additional evidence documentation that supports the Local Plan. For example, the Site Selection Technical Paper (AS01) sets out the process undertaken and provides commentary at each stage. The Site Assessment sheets (AS02-05) provide further commentary from technical officers and stakeholders in relation to sites.

IIA is just one piece of the evidence for plan-makers to consider when justifying a preferred strategy (in light of alternatives). The response to questions 5 and 7 touches upon how the IIA has helped to influence decisions. Other important factors are as follows, and rationale can be found in the following documents;

- The scale of housing and employment development needs – the scale of need for the borough is set out in the Economic and Housing Development Needs Assessment documents EH01 and EH03 and EH03a. This has helped guide the level of growth the strategy needs to account for and has helped determine the broad strategy options with Telford, for example remaining the key focus of growth due to the level of infrastructure, services, employment opportunities and land availability.
- The Newport Employment Land Study EH06 has helped identified a more locally derived figure for employment land needs in Newport. This has helped guide strategy options and ultimately the selection of employment land in the Newport area.
- Capacity of services and infrastructure – as an example the Rural Settlements Technical Paper (EH02) provides an assessment of the infrastructure within the boroughs villages. This evidence has informed the identification of key

rural settlements that have been identified as the focus of growth in the rural area with allocation as well as potential for windfall housing.

- Likely constraints to development – as an example the landscape documents (NC02 – NC04) provides evidence around areas of the borough that have high landscape value that has helped in the assessment of reasonable alternatives. The information has guided strategy in avoiding areas of higher landscape value as potential broad areas for development.
- Transport capacity – the Transport SWOT Analysis document (IS08) identified key strategic infrastructure issues in relation to Broad Areas for Growth. The Traffic Modelling Report (IS04) and Transport Growth Strategy Refresh (IS05) helped inform broad development strategy in focussing the majority of development in Telford and Newport as accessible well served areas with good connections to the principal and strategic road networks.
- Flooding and water resources - The SFRA Level 1 (WF01) and Level 2 (WF02) and Water Cycle Study (WF05) have helped to inform the strategy and fed into the site selection process.
- Viability – The Whole Plan Viability Study (VS01) has helped informed the broad strategy through the identification of site typologies and their broad viability.

Q24. Is the site selection process clear and suitably robust, supported by the SA and other evidence?

The IIA (CD06) forms a part of the wider site appraisal and selection process. Only reasonable site options were tested through the IIA at Stage 3 of the site selection process. This is an appropriate, proportionate approach to site sifting and analysis.

The criteria within the IIA cover a broad range of sustainability topics, linked to the IIA Framework and allowed for an objective and consistent comparison of site options.

Q25. Is the development strategy sufficiently clear about the respective roles of Telford, Newport and the rural area?

Yes, section 4 paragraphs 4.1 – 4.15 in the Publication Version of the Local Plan (CD01) set out the roles of Telford, Newport and the rural area within the context of the borough as a whole. Telford as the larger population centre will see the majority of growth over the plan period. Newport and the rural area have distinctive roles as a market town in the case of Newport and in the rural area recognition of the key rural settlements that are suitable for additional growth (windfall and in some cases, housing allocations). These roles are further clarified in development management strategies including; EC5, EC6, EC8, HO12 and HO13.