

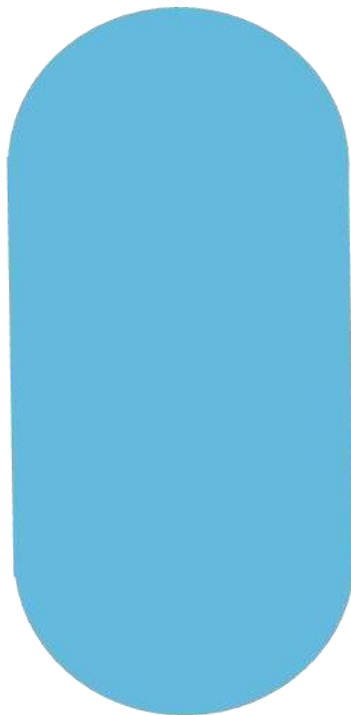


# **Statement in Respect of the Telford and Wrekin Local Plan Examination**

## **Matter 5 – Allocations**

**On Behalf of the Wappenshall Consortium**

**January 2026**



## 1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Marrons on behalf of the Wappenshall Consortium with respect to Matter 5 – Allocations. The Consortium control all land within SC3 – Land North of A442 Wheat Leasows. They include Homes England, Hallam Land (national land promoter), and Bellway Homes Limited (national housebuilder).

## 2. MATTER 5 – ALLOCATIONS

**Issue 1: Whether the allocations and their requirements are justified, effective, and consistent with national policy.**

***Q46 Do the ‘carried forward’ employment allocations need to be included in the Plan for it to be sound?***

- 2.1 The Wappenshall Sustainable Community (Policy HO2: SC3 Land North of A442 Wheat Leasows) includes existing employment allocation E28 Shawbirch. The status of this Site as a carried forward Local Plan allocation will therefore change to its allocation as part of SC3 through the Local Plan Review. The Consortium are committed to bringing the land forward as part of the wider allocation, and confident it will be delivered within the Plan period in order to help meet employment needs. Accordingly, there is no need to ‘carry forward’ the previous allocation.

**Issue 2: Whether each of the Sustainable Communities allocations in Policy HO2 and their policy requirements are soundly based?**

***Q47 Are each of the Sustainable Communities (SCs) allocations and their policy requirements justified, deliverable/developable, consistent with national policy and supported by the evidence? Do they accord with the development strategy of the Plan?***

- 2.2 The allocation of the Wappenshall Sustainable Community (SC3) is justified, deliverable/developable, consistent with national policy, and supported by the evidence prepared to support the Local Plan. It also accords with the development strategy of the Plan being immediately adjacent the urban area of

Telford.

- 2.3 It is justified and wholly supported by the Integrated Impact Assessment (IIA) Report (PD02, December 2024). Paragraph 7.3.3 outlines that the Wappenshall Sustainable Community (SC3) would deliver major positive economic impacts adjacent to existing employment development, and good positive opportunities to enhance biodiversity, with limited negative impacts.
- 2.4 Further, the allocation is consistent with the advice set out in Paragraph 33 of the National Planning Policy Framework (NPPF, December 2024), which states that significant adverse impacts identified in a Sustainability Appraisal should be avoided, appropriate mitigation measures provided for unavoidable adverse impacts and, where mitigation is not possible, compensatory measures should be considered.
- 2.5 In relation to SC3, the only major negative effect identified in the IIA (page 264 onwards) is the loss of Grade 2 agricultural land. This is an unavoidable impact, and by its nature not fully capable of mitigation in light of the quantum of land that must be released to cater for development needs. Partial mitigation will be achieved by retaining a proportion of the Site for food production in the form of allotments and community growing space. The residual impact will be compensated for by the overall benefits of the proposed allocation (including, but not limited to, provision of housing in a highly sustainable, well-connected location, and the proposed mitigation through substantial improvements to biodiversity and habitats (including the achievement of at least 10% Biodiversity Net Gain)). The allocation is therefore justified and supported by the evidence.
- 2.6 In terms of whether the Site is deliverable/developable, the Consortium have demonstrated, through the submission of a suite of evidence base documents and representations made at the Regulation 19 stage, that the Site is developable in accordance with the definition in the NPPF. The submitted Vision Document and Emerging Masterplan include provision for two mixed-use local centres, mobility hubs, formal and informal public open spaces, ecological enhancements connecting with the existing green networks, a secondary school, and two primary schools with nursery provision, as per the vision for the Site in Policy HO2. These demonstrate that the Site can deliver the necessary development requirements as identified within the draft allocation. The trajectory for its delivery is set out

below in response to Question 48.

- 2.7 Finally, the allocation of the Wappenshall Sustainable Community (SC3) is consistent with the NPPF, in particular Paragraph 77 which supports planning for larger scale developments that are well located and well designed, supported by the necessary infrastructure and facilities (including a genuine choice of modes of travel).
- 2.8 The submitted Access and Accessibility Review demonstrates how ‘well related’ the Site is to the urban area and its services and facilities. Figure 3.1 from that document (reproduced below) illustrates this in Plan form. It will be noted that the existing built form wraps around the eastern, southern and western boundaries of the Site, and that there are no significant physical barriers between the existing urban area and the proposed allocation.

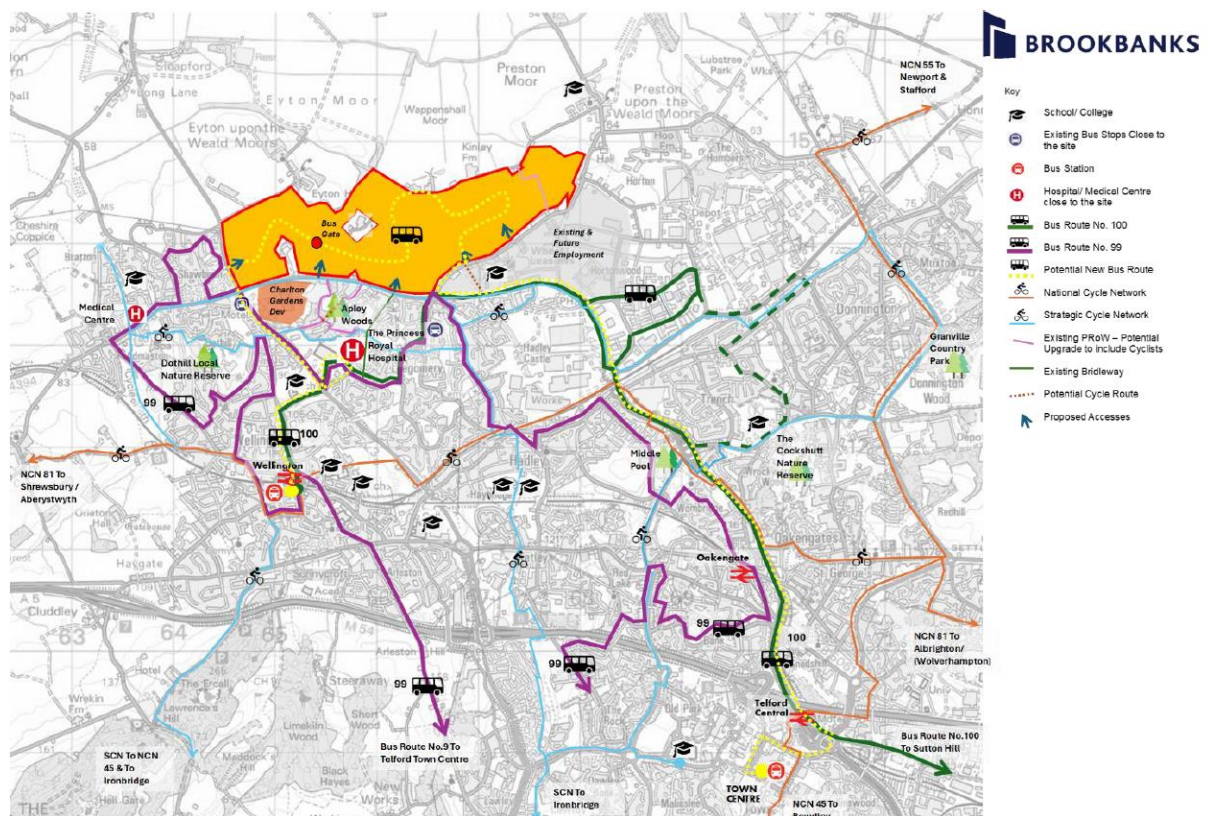


Figure 3-1: Wider Accessibility Plan

- 2.9 In relation to design, the submitted Vision Document articulates the Consortium’s aspiration in terms of high quality design and creating a sense of place and identity that will:

- provide high levels of connectivity within and beyond the development for sustainable active travel modes;
- respect the history of the wider area and the setting of the heritage assets to the north of the Site at Wappenshall Wharf and Eyton Hall through providing appropriate buffers between development and those assets;
- make space for ecological enhancements and the achievement of biodiversity net gain;
- respect the existing watercourses and drainage infrastructure within the Site and incorporate sustainable drainage features (informed by modelling);
- incorporate and enhance existing landscape features where appropriate through extensive green infrastructure and planting;
- include a mix of uses to support healthy lifestyles and active travel for day-to-day journeys; and,
- deliver buildings which are beautiful, efficient and sustainable, and incorporate quality public spaces and buildings which will develop community spirit and togetherness, leaving a lasting legacy of a strong, thriving and inclusive community.

2.10 In this respect, the Consortium note the Regulation 19 representations made by Eyton Parish Meeting expressing concerns that SC3 will compromise the integrity and effectiveness of the Strategic Landscapes. The Strategic Landscape designation is to the north of Wappenshall Wharf and SC3. Policy NE6 sets out the requirement for development to not cause detrimental change to the quality of the landscape, and the Consortium are confident development can come forward within SC3 in accordance with this policy. Further, the Consortium have illustrated on the Framework Masterplan submitted with their Regulation 19 representations how a significant landscaped buffer (circa 300m) can be accommodated between built development and the landscape designation. The extent of the buffer necessary will be considered and determined through the Development / Design Brief and planning application process, informed by detailed landscape and visual impact assessments.

2.11 Concerns expressed by Eyton Parish Meeting in relation to harm to the integrity of Eyton and Wappenshall as settlements are noted. However, the Framework

Masterplan again illustrates how their integrity can be maintained through landscaped buffers between built development, with a buffer of at least 200m in the case of Eyton. The Council's Heritage Impact Assessment (TW02) considers that any harm to the significance of heritage assets in Eyton will be minor, and the Consortium are confident that development can come forward in accordance with the heritage policies of the Plan. Given the Council's suggested modification to the wording of policy HO3, and the landscape, design and heritage policies, the Consortium do not consider there is a need for a strategic green gap to be identified in the Plan. Moreover, the gap suggested by the Parish Meeting is not justified by any evidence and is considered inappropriate. Other concerns raised by the Parish Meeting in respect of transport and drainage are capable of and will be addressed at the planning application stage, at which point any impacts will be assessed against the policies within the Local Plan.

- 2.12 The Consortium's Vision alongside the landscape, heritage and design policies within the Local Plan will ensure the development will be 'well designed', sustainable, and seamlessly integrate with the existing built form of the urban area.
- 2.13 Finally, the Site benefits from proximity to existing infrastructure and facilities within Telford including The Princess Royal Hospital and a range of employment opportunities. Where necessary, some form of this infrastructure can be improved to meet the needs arising from the development as evidenced by the Council, and this will be assessed at the planning application stage in accordance with the policies of the Local Plan. Further, infrastructure improvements will assist in ensuring a genuine choice of modes of travel from the Site to the urban area given the distances and nature of active and sustainable travel routes, as illustrated within the Access and Accessibility Review.

***Q48 Does the evidence support the expected delivery trajectory on each site? Does the market and other evidence take account of all three SCs seeking to deliver housing at a similar time in a similar part of Telford?***

- 2.14 The Wappenshall Consortium support the trajectory for delivery of the Wappenshall Sustainable Community (SC3) set out in the Land North of A442 Wheat Leasows Topic Paper (TW08 SC3, December 2025).

- 2.15 It is highly relevant when considering the realism of the delivery trajectory that the Consortium comprises (a) Homes England who are the national agency responsible for boosting housebuilding; (b) Hallam Land a vastly experienced land promoter operating across the country delivering major mixed use developments; and (c) Bellway Homes a national housebuilder experienced in delivering homes at scale. They bring them with vast experience and knowledge in delivering homes and jobs in a timely and efficient manner.
- 2.16 The assumptions made in relation to the expected delivery trajectory (circa 200 dwellings per annum) are based on the Consortium's experience of bringing forward similar developments elsewhere in Telford, including the Lawley Sustainable Urban Extension which achieved upwards of 300 dwellings per annum during peak delivery. The Site lends itself to multiple residential outlets for sales given the number of potential access points from the highway network. Further, the employment land is capable of coming forward independently with multiple potential access points off a central spine road.
- 2.17 With regard to delivery in the wider area, the Consortium are not concerned the proximity of other housing developments would slow delivery rates. It is important to note that neither Homes England, Hallam Land or Bellway Homes Limited are involved in the other two Sustainable Communities allocations.
- 2.18 It is also noted that, based on the trajectories for each of the three Sustainable Communities set out in the relevant Topic Papers, the expected cumulative delivery peaks at 685 dwellings in 2035/36, with broadly between 500 and 600 dwellings per annum expected to be delivered once the Sustainable Communities are up and running. This is far below the average level of annual housing completions seen in Telford during the current Local Plan Period of 916 dwellings per annum (since 2011/2012), with over 1,000 dwellings delivered per annum since 2021/22 and a peak of 1,308 dwellings delivered in 2022/23<sup>1</sup>.
- 2.19 As such, it is considered that delivery of the three Sustainable Communities can be accommodated within the Telford housing market concurrently.

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<sup>1</sup> Telford and Wrekin Council Annual Monitoring Report 2023/24

***Q49 Do any of the proposed requirements of Policy HO2 for each site conflict with or duplicate the other policy requirements of the Plan?***

- 2.20 Yes, there is duplication within Policy HO2 with specific reference to the requirement to comply with Policy Strategic S6 (Healthy Stronger Communities) and Policy Strategic S7 (Developer Contributions and Infrastructure Delivery). This is despite the final sentence of each of the three Sustainable Communities policies stating that “This policy needs to be read alongside all relevant other policies within the Local Plan”.

***Q50 Will Policy HO2 and the approach it proposes to bringing the sites forward be effective in ensuring that all the requirements for each SC can be achieved?***

- 2.21 The Consortium consider the wording of HO2 SC3 would benefit from amendments as set out in the Regulation 19 representations below, some of which the Council have sought to address through their proposed modifications, but others which remain outstanding. Note a revision is proposed by the Consortium to reflect the Council's suggested approach to a Design Brief and not a Development Brief.

**SC3 Land North of A442 Wheat Leasows**

*The land is to the immediate north of the built-up area of Telford. The land sits adjacent to predominantly commercial developments to the east, and residential development to the south and west of Queensway (A442). To the north, and north-east lie the settlements of Horton, Preston upon the Weald Moors, Wappenshall Junction, and Eyton upon the Weald Moors.*

*Site Area: approx. 274.1ha (gross)*

**Vision for the site**

*~~The Site Land within the strategic allocation at Land North of A442 Wheat Leasows~~ will be developed to deliver a new sustainable community of approximately 3,100 dwellings with 2,190 of those to be delivered in the Plan period. The Site will also provide approximately 68ha of employment land (gross) which includes 22ha of an existing*



employment allocation, E28 at Shawbirch. ~~The employment land will be phased throughout the plan period.~~

The dwellings ~~will must~~ provide a range of multi-generational living accommodation that includes accommodation for the elderly, supported and specialist provision and accessible housing that meets the identified needs in the ~~B~~orough.

At the heart of the community, the site will provide two mixed local centres comprising a range of shops and services to include **potentially** community, leisure and recreation facilities. ~~The delivery of these should be agreed with the Local Planning Authority~~

The site will provide an active and sustainable travel network, ~~leading a~~ **including** mobility hubs ~~provided within the local centres. These hubs should provide enable delivery of a~~ number of facilities such as enhanced bus services, EV car charging, car hire parking, **and parcel box lockers.** ~~as well as walking and cycling facilities.~~

A network of formal and informal public open and recreation spaces **to extend the Borough's existing green network** will be provided. ~~in line with the Council's Playing Pitch and Outdoor Recreation Strategy and the Play Strategy.~~

~~The site must also provide extensions to the boroughs existing green network.~~

~~The sustainable community must provide~~ **Provision of** two primary schools, both comprising of two form entry and nursery provision will further meet the needs of the development. ~~The delivery of the primary schools should be delivered to an agreed plan with the Local Planning Authority in line with projected housing delivery rates.~~

Land ~~for to deliver~~ a Secondary School will also be provided on site to serve the needs of this and the other allocated sustainable communities (SC1 and SC2), with an appropriate mechanism in place within a Section 106 Agreement to compensate for provision of land and build cost ~~over~~.

### **Delivery**

A ~~Design development~~ **B**rief will be required to coordinate uses across the site, that is based on effective community engagement and reflect local aspirations, **in accordance with Policy DD2.** ~~The brief shall consider the environmental, social, design, and economic~~

~~objectives as they seek to create a new community. This will allow for the all elements of the proposal to be considered comprehensively in order to promote an integrated development as far as is practical. The Design B~~rief shall be agreed by the Local Planning Authority prior to **the determination of any planning application for the site.** ~~consideration of any detailed matters. The Design~~velopment Brief shall contain objectives, site information covering opportunities and constraints, relevant policies, a framework masterplan and explanatory text that provides guidance as to the intended land uses, access arrangements, layout, density, building heights, and infrastructure delivery.

~~The site must provide the following details to allow for an efficient and comprehensive delivery of the site: Delivery of highway and transport infrastructure to an agreed phasing plan to allow for highways adoption as soon as possible. Delivery of on-site and off-site utilities infrastructure to a phasing plan approved by all utility undertakers. The proposal needs to: incorporate~~

- **Consider and reflect as necessary the** recommendations from the Level 2 Strategic Flood Risk Assessment outcomes for this site.
- ~~Maintenance~~Retain the functionality of the Northern Interceptor Channel as a strategic drainage asset.
- Provide a comprehensive Green Infrastructure strategy ~~incorporating the Council's vision for a forest community including:~~
  - Structural landscaping and public open space
  - Extension of Green Network Connection to the Silkin Way and Apley Woods
  - Footpath and cycleway connections into and around the site
  - Identified areas of existing woodland and new planting

~~This P~~olicy needs to be read alongside all relevant other policies within the ~~L~~ocal **P**lan.

**Q51 Does the evidence demonstrate that all three SCs are viable in respect of delivering all the requirements of Policy HO2 and other relevant policies of the Plan when taken together? Are any of the SCs reliant upon external funding?**

- 2.22 The Council's evidence does not demonstrate that the Sustainable Communities, including the Wappenshall Sustainable Community (SC3), are viable when

required to deliver all the requirements of Policy HO2 and other relevant policies of the Local Plan when taken together.

- 2.23 This is important as National Planning Practice Guidance (NPPG)<sup>2</sup> requires that the role for viability assessment is primarily at the plan-making stage. Viability assessment should not compromise sustainable development, but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies.
- 2.24 Moreover, NPPG<sup>3</sup> also confirms that it is important that strategic sites should be assessed for viability in the plan making process, accounting for their specific circumstances. The underlying rationale of this Guidance is to ensure that the policies are realistic, and will not undermine the viability and delivery of strategic sites which are often critical to delivering the strategic priorities of the plan.
- 2.25 As set out in the Consortium's response to Matter 6, Issue 1 (Question 61), the requirement for 25% affordable housing is not supported by the Council's own viability evidence in the Regulation 19 Viability Note (VS02, December 2024), which recommends an affordable housing requirement of 20% in and adjacent to Telford based on the underpinning analysis therein.
- 2.26 Moreover, the Regulation 19 Viability Note (VS02, December 2024) states at Paragraph 6.10 that the residual land value for the Sustainable Communities falls below the benchmark land value and concludes that these sites are likely to be challenging to deliver even with 20% affordable housing. The Appendix 1 Table on p.25 of the Regulation 19 Viability Note demonstrates that, based on the Council's evidence, the Sustainable Communities become viable only if the affordable housing requirement is reduced to 15%.
- 2.27 Furthermore, the Consortium have concerns with the assumptions set out in the Viability Assessment supporting the emerging Local Plan, namely the assumed £15,000 per plot costs of strategic infrastructure and £4,000 per plot Section 106 costs related to the required mitigation for the proposed Sustainable Communities. The Consortium has been unable to identify any evidence

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<sup>2</sup> Viability Paragraph: 002 Reference ID: 10-002-20251216

<sup>3</sup> Viability Paragraph: 005 Reference ID: 10-005-20180724

underpinning adoption of these rates.

- 2.28 The experience of the Consortium and its consultants is that, benchmarking this against other Sustainable Communities delivered across the Midlands, these cost allowances are far lower than those realistically required to deliver the strategic and community infrastructure on projects of this scale. If (as the Consortium believes) these costs have been underestimated, little reliance can be placed on the Regulation 19 Viability Note (VS02, December 2024) because underestimation of costs inevitably results in an over-estimate of profit and thus viability.
- 2.29 Further technical assessment of strategic infrastructure costs will be necessary at the planning application determination stage. This could have a negative impact on bringing forward the Sustainable Communities, and have a knock-on impact on the Council's housing trajectory and ability to demonstrate a positive Five Year Housing Land Supply position. In addition, it could cause friction between applicants, key stakeholders and the wider community, who may consider that financial contributions and provision of affordable housing is being challenged at the application stage without justification, even though the premise of such contributions is not being accurately considered through the Local Plan viability work.

***Q52 (a) Is the employment land requirement in each of the SCs justified?  
(b) Does the policy include sufficient clarity and/or flexibility around the quantum, location and type of non-residential development to be delivered in the SCs?***

- 2.30 In response to (b), the Consortium consider that Policy HO2 includes sufficient clarity and flexibility with regard to the quantum, location and type of non-residential development (save for education) as this will be established through the Development Brief (or Design Brief and Masterplan as suggested by the Council) process, which is supported by the Consortium. However, for the purposes of supporting this Plan, the Consortium have demonstrated within its Vision Document how such uses could be accommodated.
- 2.31 However, flexibility should be incorporated into Policy HO2 in relation to education. As set out in response to Question 55, given the length of time taken

to deliver developments of this scale, infrastructure requirements can change over time and policy requirements can subsequently become out-of-date.

- 2.32 Additionally, the Consortium have proposed a revision to Policy HO2 SC3 in their Regulation 19 representations to state that community, leisure and recreation facilities could potentially be included within the two mixed-use local centres to provide flexibility as to their location, as follows:

*At the heart of the community, the site will provide two mixed local centres comprising a range of shops and services to include **potentially** community, leisure and recreation facilities. ~~The delivery of these should be agreed with the Local Planning Authority~~*

***Q53 How have the impacts of growth planned in the SCs on infrastructure and flood risk, individually and cumulatively, been assessed and where is this set out?***

- 2.33 In respect of flood risk, the Consortium have carried out a hydraulic analysis of the Hurley Brook / Northern Interceptor Channel to provide certainty about any potential flood risk that this infrastructure may pose to the Wappenshall Sustainable Community (SC3). This has been reflected in the Emerging Masterplan for the Site within the Vision Document, which seeks to avoid and manage both this risk and the risk from any other sources of flooding in accordance with the relevant planning policies.
- 2.34 The Wappenshall Sustainable Community will be planned to align with both local and National Planning policies, which require the development to be safe from flooding from all sources over its lifetime and not to increase flood risk elsewhere. Our analysis demonstrates that post development discharge rates and volumes will not exceed the site-specific Greenfield runoff rates with an allowance for increases in peak rainfall due to climate change.
- 2.35 Surface water runoff from the development will be discharged via SuDS with discharge either to ground or at greenfield rates (and to a 1 in 3-year event as per the National SuDS Standards) for all events up to and including the 1% Annual Exceedance Probability rainfall event, thereby reducing flood risk associated with such events. This will also increase the resilience of the capacity of the receiving systems and reduce the risk of downstream flooding.

- 2.36 The impacts of the proposed Sustainable Communities on the existing foul drainage infrastructure has also been considered in the supporting Integrated Impact Assessment Report (PD02, December 2024). This Report sets out that the Borough is not currently water stressed, and this will remain the case as a result of development of the Sustainable Communities (i.e. development will not cause the area to become water stressed), there will be no issues in relation to headroom capacity at waste water treatment works serving the area, and that the ecological quality of existing water courses will be maintained or improved when the schemes are brought forward. The summary of the Report in respect of water resources predicts overall minor positive effects in the short, medium and long term.
- 2.37 Further information is set out within the Flood Risk and Modelling Review submitted with the Consortium's Regulation 19 representations.

***Q54 How will delivery of additional infrastructure be coordinated between the three SCs, and between developers and relevant agencies, and how will this be secured? Does this need to be explained in the Plan?***

- 2.38 The Consortium are committed to working with the Council, developers of the other Sustainable Communities and other relevant agencies to deliver the infrastructure necessary to serve the Sustainable Communities. In respect of the Wappenshall Sustainable Community (SC3), necessary infrastructure and land for infrastructure can be secured by way of condition or through Section 106 Agreements or Section 278 Agreements in accordance with Policies HO2 and S7.
- 2.39 As set out in the Topic Paper TW08 SC3, Site SC3 will provide the land for the secondary school which will provide secondary school places for children across the three Sustainable Community sites. All parties are in the process of agreeing an equalisation methodology for apportionment of costs (including land) towards the Secondary School. The Council has suggested a modification to the Plan to require contributions from SC1 and SC2 towards land and build costs of the Secondary School, and this is supported by the Consortium. The Council have also proposed the use of a Framework S106 Agreement that ensures consistency across applications, and this is supported in principle by the Consortium.
- 2.40 The Consortium consider that agreement of an acceptable delivery mechanism

for the Secondary School is of great importance as it is fundamental to the delivery of the Sustainable Communities, and could have an impact on deliverability if not addressed appropriately.

***Q55 Does the policy need to specify the size of new schools required in the SCs to be effective? Is there sufficient flexibility if evidence on school place planning changes over the Plan period?***

- 2.41 Flexibility in the precise size and scale of education facilities would be beneficial in recognising that the need for school places will inevitably evolve as time progresses including as a result of the publication of updated pupil forecasts, the particular number and mix of units provided on each site, and updated guidance.
- 2.42 The consequence of a lack of flexibility may be that the Policy requires either more or less school places than are actually required such that the policy may either require the provision of schools that are not needed which if provided would be to the detriment of the viability of existing schools, or it may not make sufficient provision for schools contrary to Paragraph 20 c) of the NPPF. Either would be unsustainable. It is suggested reference to the forms of entry is removed from the policy wording.

***Q56 (a) Is there clear and convincing evidence of the highways and sustainable transport infrastructure that is needed for successful delivery of each SC, including mitigation of traffic impacts on local roads and existing communities? (b) Does necessary transport infrastructure and its expected phasing need to be set out in the Plan for the policy on SCs to be effective?***

- 2.43 The Council commissioned Atkins to produce a strategic transport model for Telford to assess the potential impacts of the Sustainable Communities being promoted through the Local Plan process. Based on the modelling reports shared to date, the Consortium consider the modelling assessment undertaken robust, incorporating relatively high trip rates while allowing for a degree of internalised trips. The model includes forecast growth within the local area and applies TEMPRO growth assumptions to areas beyond Telford.
- 2.44 Based on the modelling outputs, Atkins have identified a number of junctions on

the primary road network that may require improvement to accommodate the forecast increase in traffic movements. These junctions and associated mitigation measures are set out in Atkins' modelling report dated March 2025. The results indicate that the proposed improvements would assist in mitigating the impacts of the Sustainable Communities without resulting in adverse effects on existing communities. The proposed mitigation measures include road widening and alterations to lane configurations to improve traffic flow and network capacity.

- 2.45 The modelling report produced by Atkins includes an outline cost plan and an indicative implementation programme for the identified mitigation measures. However, the report does not specify which individual junction improvements are required in relation to each of the Sustainable Communities. Further work will therefore be necessary to clearly apportion and align mitigation measures to specific Sustainable Communities, to ensure that appropriate and effective mitigation is delivered in a timely manner as each site comes forward. That exercise will need to be undertaken at the application stage when more detail is available, such as the nature of the proposed developments and the assumptions around modal shift.

***Q58 Does the policy need to require development in SC3 to contribute to projects for the enhancement of heritage assets with tourism potential (such as the Shrewsbury & Newport Canals and Wappenshall Wharf) for the Plan to be effective?***

- 2.46 No, Regulation 122 of the Community Infrastructure Levy Regulations 2010 is clear that developer contributions should only be sought where they are necessary to make the development acceptable in planning terms, fairly and reasonably related in scale and kind to the development, and proportionate to the impact of development.
- 2.47 The Council's Heritage Impact Assessment (TW02) concludes the impact on the significance of Wappenshall Wharf from the proposed development is minor, with the potential for it to be beneficial through increased interpretation of, and access to, the route of the former Canal. The development of SC3 can provide interpretation boards and access to the route of the former Canal, as well as improve connectivity by all modes between Telford and the Shrewsbury and Newport Canal and Wappenshall Wharf for the benefit of tourism.



2.48 However, there is no justification for contributions to enhance the assets. Further, no provision has been made for contributions towards the enhancement of heritage assets as a result of the Wappenshall Sustainable Community (SC3) in the viability work underpinning the Local Plan. Any contributions required are likely to impact the provision of contributions towards infrastructure and the level of affordable housing which can be delivered.

23<sup>rd</sup> January 2026

