

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

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#### Matter 6, Issue 6

##### **Issue 6: Whether the policies for sustainable travel (ST) and transport networks are justified, effective and consistent with national policy and guidance.**

Q117. The Council's emerging Local Transport Plan (LTP) is referenced in paragraphs 11.2, 11.13 and 11.19. (a) When is the LTP expected to be finalised, and will the ST policies be effective before then? (b) Is the Local Plan Transport Strategy referred to in paragraph 11.17 the same as the LTP? If not, what is it and does this need to be explained?

(a) - The LTP is expected to be finalised in early 2027 and the Sustainable Travel (ST) policies will be in place before then. The Local Transport Plan (LTP) is expected to be finalised and adopted in early 2027, therefore the Council would expect the ST policies within the plan to be in place before the finalisation of the LTP. Due to the short period between the adoption of both documents the Council consider it reasonable to refer to the new LTP document. The references to the LTP provide wider context regarding the Council's highway and transport networks and the policies in the Local Plan are not reliant on the new LTP being in place. Therefore, the plan policies can be effective before the adoption of the new LTP document.

(b) - The Local Plan Transport Strategy referenced in paragraph 11.17 should refer to the Telford Growth Strategy Refresh 2025 (IS05) not the Local Transport Plan. The Council considers that further clarification of this within the text could aid in the clarity of this section.

Q118. To be effective, does the Plan need to direct applicants to the proposals for borough-wide cycling and walking improvements in the Council's Local Cycling and Walking Infrastructure Plan [IS06] and/or the Council's Bus Service Improvement Plan [IS07]?

When submitting planning applications, applicants will primarily be expected to make reference to the Telford Growth Strategy Refresh 2025 (IS05). Following this, the Local Cycling and Walking Infrastructure Plan (LCWIP) (IS06) and Bus Service Improvement Plan (BSIP) (IS07) should be used to inform development proposals and decision making.

The Council considers that adding explicit reference to IS06 and IS07 in supporting text could aid applicants in understanding the expectations of development and directly referencing this in the plan could be a beneficial modification.

## **Policy ST1 – Sustainable travel**

Q119. All the requirements in part 1 of the policy are subject to viability. (a) Is this justified? (b) Will this be effective in delivering the Plan's sustainable travel objective?

(a) - The Council propose a further modification to the policy which replaces 'where *viable*' with 'where *appropriate*'. This will help clarify the policy as it is recognised that it may not always be possible to apply the policy criteria under part 1 on a universal basis. For example not all major developments (10 homes or more) will need to meet point f of the policy.

(b) - Yes, policy ST1 is expected to be effective in delivering access to sustainable travel throughout the borough. The policy has been informed by a combination of documents, such as the Integrated Impact Assessment (CD06) and the Whole Plan Viability Assessment (VS01) as well as national policy section 9 (para.111, 129), the Telford Growth Strategy Refresh (IS05), the Local Cycling and Walking Improvement Plan (LCWIP) (IS06) and Bus Service Improvement Plan (BSIP) (IS07). It will help secure contributions towards investment into walking and cycling infrastructure, improve connectivity to services and facilities and provide travel choice to residents, workers and visitors to the borough.

Q120. In part 1c: (a) is the meaning of “dementia-friendly design” clear; and (b) is this design requirement justified for all major development in the urban areas?

The Council finds, having consulted on the plan, that policy ST1.1c could be clearer with regards to 'Dementia friendly design'.

To remedy this, it is considered that the following modification to the wording of policy ST1.1c would be appropriate:

*“c. The use of Dementia friendly design principles”*

Key principles can include enhancing wayfinding with clear sightlines and signage, maximising natural light, utilising high-contrast, non-reflective surfaces, and reducing environmental noise. These could be included in a glossary definition if required.

There are resources available for developers to access which provide further detail regarding good 'dementia friendly design' that will help shape development proposals moving forward, an example of this is the Housing Learning and Information Network. The Council recognise that design resources may evolve therefore the Council have not been prescriptive in policy.

Q121. Is the meaning of the phrases “accrued by the development” in part 1d, and “Where a development is served by one of the borough’s rail and bus stations” in part 2, clear and unambiguous?

The phrase “*accrued by the development*” refers to the increased demand for public services generated by new development, be that through new residential

developments, new employment sites and or new facilities, such as leisure centres. It is considered that within the context of the policy, this is clear and unambiguous enough to be effective.

The Council finds that the sentence “*served by one of the borough's rail and bus stations*” could be refined to provide more clarity, the following suggested modification has been proposed in CDO8:

“*Where a development is in close proximity to one of the borough's rail and bus stations*”.

### **Policy ST3 – Impact of development on highways**

Q122. Is the approach to assessing and mitigating the traffic impacts of development soundly based, including in relation to SCs, allocated sites and impacts that cross administrative boundaries?

The approach within this policy has been informed by a combination of evidence base documents, including:

- Infrastructure Delivery Plan (IS01)
- Traffic Modelling Report (IS04)
- Telford Growth Strategy Refresh 2025 (document ISO5)

As well as national policy documents

- NPPF section 9 (para 115, 116)
- Paragraph 007 of the PPG ( [Transport evidence bases in plan making and decision taking - GOV.UK](#) )

The Council, as part of its Duty to Cooperate obligations engaged with National Highways on the development of the Local Plan evidence base and highways policies. National Highways provided input into and supported the use of the Telford Strategic Transport Model (TSTM) and expressed their support for the plan in general and policy during the regulation 19 consultation.

With regards to allocated sites, the site selection process has been laid out within the Site Selection Technical Paper (AS01), and further commentary is included within the IIA (CD06).

The outcome of the traffic modelling work has been captured within the IDP (IS01), which identifies highway improvement schemes that will be used to determine an appropriate mitigation strategy.

The Council has suggested a modification to Policy Strategic S7 (CD08) which recognises that, on occasion, there may be infrastructure implications that may require, where justified, the deployment of developer contributions on a cross boundary basis.

Based on the comprehensive analysis of the area and allocated sites the Council finds that policy ST3 is soundly based.

Q123. Is it clear how cumulative impacts of development will be mitigated “in a co-ordinated and plan-led manner” as stated in part 1a of the policy?

The ways in which the cumulative strategic impacts of development will be mitigated has been set out within the IDP (IS01) and includes a schedule of highway improvement projects. The IIA (CD06) as well as within the Traffic modelling report (IS04) support this approach.

There may be a need for localised transport strategies that cover multiple housing or employment development sites, in close proximity, in order to secure area wide improvements and mitigate the impact of developments coming forward. The Council will assess the need for localised strategies as part of reviewing and updating its IDP document (IS01).

#### **Policy ST4 – Design of roads and streets**

Q124. Is the requirement to accord with national guidance such as the Manual for Streets soundly based?

Yes, The Manual for Streets (2007) and the Manual for Streets 2 (2010) are long standing government guidance documents used to inform design practices. The manual standards are used by the Councils Highways Development Control Team when determining planning applications.

Furthermore, Paragraph 115.c of the NPPF states that development should ensure that the design of streets reflects current national guidance. The requirement to demonstrate that proposals accord with the Manual for Streets is also referenced in policy ST4 in the Local Plan (CD08). Government guidance is a key consideration within the planning decision making process and as such, the Council find the requirement to accord with such guidance to be soundly based.

The current consultation on Manual for Streets 3 demonstrates the continued relevance of the guidance. The consultation closes in February 2026 and the updated Manual is expected to be formalised within the plan period and will serve as further guidance for development and decision making once completed.

It should be noted that other LPAs make reference to the Manual for Streets within their respective Local Plans.

Q125. Does the policy require street trees in all development? If no, is this clear? If yes, is this justified and consistent with national policy?

No, policy ST4.1f states developments must demonstrate that street trees for new developments are carefully positioned and of appropriate species to avoid interference with property, infrastructure and highways access and visibility.

In instances where street trees would not be appropriate or possible to incorporate, development would be expected to demonstrate this.

The Council considers this to be in conformity with Part 2 N.2.iii of the National Model Design Code which mandates the use of street trees on new development, as is required under paragraph 115 of the NPPF.

In light of comments made at consultation, the Council finds that the inclusion of the following could provide further clarity to the policy with regard to street trees:

*“- or in specific circumstances where it can be clearly justified, with compelling reasons, why this would be inappropriate”*

This change would be in accordance with NPPF paragraph 136 and its supporting text (reference 52).

### **Policy ST5 – Electric vehicle (EV) infrastructure and parking design**

Q126.(a) Is the requirement to meet parking standards set out in a separate guidance document soundly based? (b) Is the policy effective in relation to parking for delivery vehicles and HGVs?

(a) - As stated in national guidance, provided the Councils latest guidance is in the form of an SPD or other adopted documents which do not attempt to impose new planning policies, requiring development to align with this guidance is considered sound. The Councils parking standards guidance does not impose new planning policy on developments, as a separate document it is easier for the Council to review and update.

(b) - Policy ST5.4g requires for provision of appropriately sized HGV and service vehicle access and parking. Typically parking for, HGV and delivery vehicles is negotiated on a case-by-case basis with specific parking levels for industrial land use provided in the Councils latest parking standards document.

Q127. Are the requirements for EV charging infrastructure soundly based given the relevant provisions in Building Regulations?

Policy ST5.2 requires all new development to provide EV charging infrastructure, this is in line with Approved Document S as well as section 9 of the NPPF.

This policy as informed by the Infrastructure Delivery Plan (IS01) as well as the Telford & Wrekin Council Public Electric Vehicle Charging Infrastructure Strategy (2022).

The policy was positively prepared, clearly addressing an unmet need for higher provision of EV charging points within the borough, justified by the evidence base, deliverable over the plan period and consistent with national policy.

Whilst Approved Document S covers provision of EV charging infrastructure for all development, the Council still considers explicit reference within the plan to be appropriate in order to effectively deliver the Council's suitability goals. Furthermore, the Council wish to encourage development to be ambitious, rather than only seeking to provide the minimum requirements.

As such the Council finds Policy ST5 sound in relation to EV charging infrastructure.

Q128. Is the requirement for “reasonable provision for storage of associated cycle equipment and where possible changing facilities” in part 3b justified and effective?

Policy ST5.3 states development will be supported where it can be demonstrated that relevant cycle parking design elements have been considered. The policy does not require these provisions for all development but rather, seeks to encourage more consideration for sustainable transport modes such as bikes.

The borough has an extensive network of cycle routes with provision of parking in key locations such as Telford Central, Oakengates and Wellington railway stations and Telford Town Park. The Council has a strong commitment to improving sustainability and health and wellbeing in the borough and encouraging and investing in cycling is one of the ways in which these issues can be improved.

The policy has been informed by a combination of existing and evidence base documents:

- Local Walking and Cycling Improvement Plan 2022 (IS06)
- The Telford Growth Strategy Refresh 2025 (IS05)
- Integrated Impact Assessment Report (2024) (CD06)

As well as NPPF guidance;

- Paragraph 96
- Paragraph 109
- Paragraph 111

Other relevant government guidance includes the LTN 1/20 (Part 11) Cycle infrastructure design. As such the Council consider policy ST5.3 be well justified and effective.