

Telford and Wrekin Local Plan Review

Integrated Impact Assessment: Interim SA

November 2023

Quality information

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Revision History

Revision	Revision date	Details	Name	Position
V1	October 2023	Internal review	LM	Senior Consultant
V2	October 2023	Draft for Client review	IM	Associate Director

Prepared for:

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Table of Contents

1. Introduction	1
2. Scoping	5
3. Appraisal Methods	37
4. Consideration of reasonable alternatives.....	42
5. Strategic housing options	48
6. Strategic employment options.....	69
7. Sustainable Urban Extensions.....	80
8. Individual site appraisals.....	86
9. Appraisal of the Draft Plan	87
10. Recommendations	96
11. Monitoring and next steps.....	97
Appendix A : IIA Framework.....	99
Appendix B : Strategic Housing Options Appraisal	103
Appendix C : Strategic Employment Options Appraisal	209
Appendix D : Appraisal of Sustainable Urban Extensions	238
Appendix E : Site Assessment Methodology and Appraisal Matrix	266
Appendix F : Full draft Plan Appraisal	280

1. Introduction

1.1 Background

1.1.1 The Borough of Telford & Wrekin is located between the urban areas of Birmingham and the Black Country to the east and the rural areas of Shropshire and Wales to the west. Telford & Wrekin adjoins the administrative boundaries of Shropshire, South Staffordshire and Stafford Borough Councils. Figure 1.1 provides a location map for the Local Authority area.

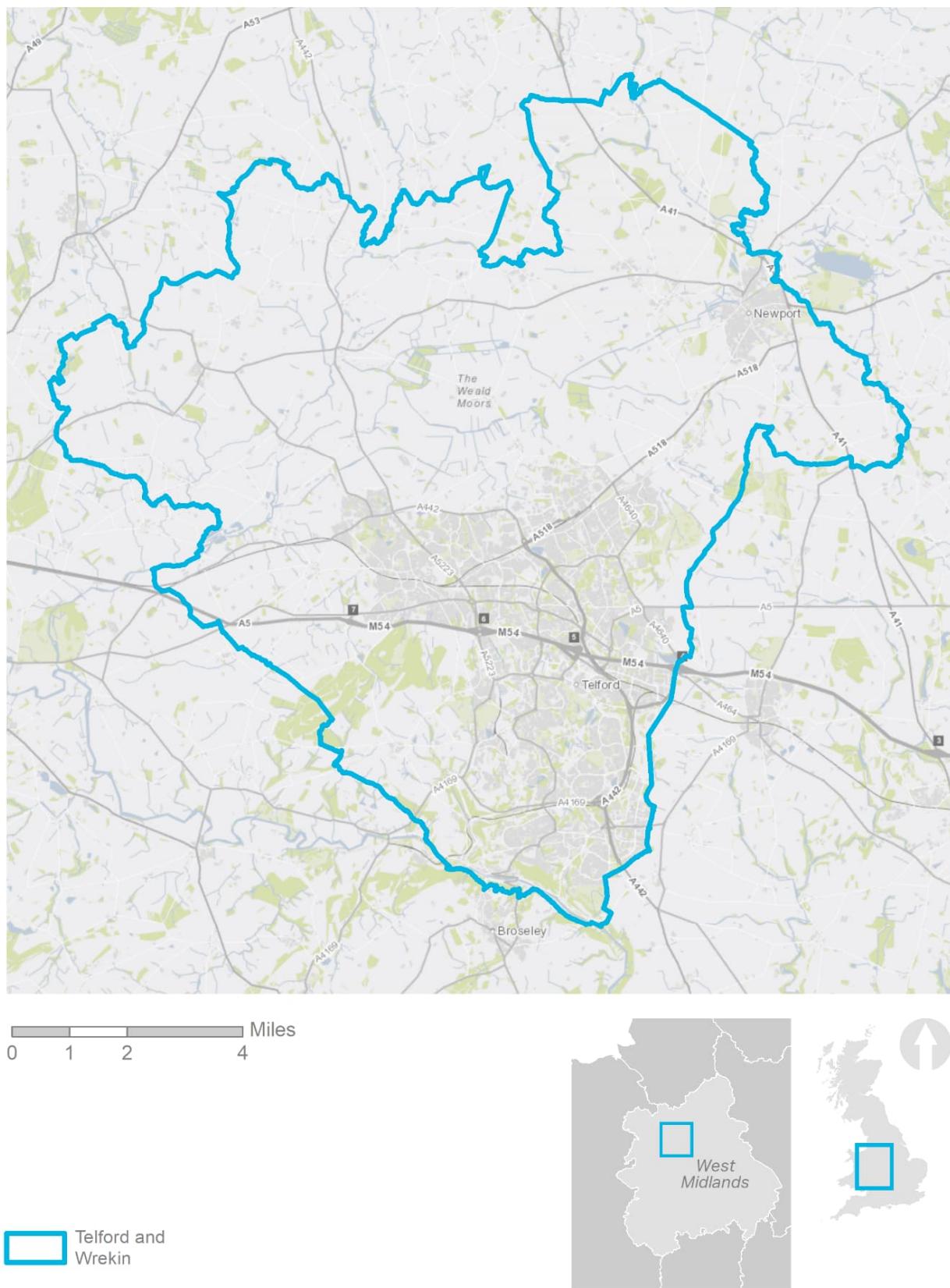
1.1.2 Telford & Wrekin Council (the Council) are in the process of undertaking a Local Plan Review. The purpose of a review is to take account of changing circumstances affecting the area, or any relevant changes in national policy. A review enables the Council to address local opportunities and/or challenges in areas such as natural environment, transport, health and wellbeing, provision of affordable and specialist accommodation and climate change.

1.1.3 AECOM has been commissioned by the Council to lead on an Integrated Impact Assessment (IIA) in support of the Local Plan Review

1.1.4 This document is an Interim SA Report, which sets out the background information, policy context and key issues in relation to a range of sustainability issues. This is one of the first outputs from the IIA process, and it sets the framework for future work. Key information can be found below (Table 1.1).

Table 1.1: Key facts relating to the Local Plan Review

Name of Responsible Authority	Telford and Wrekin Council
Title of Plan	Review of the Telford and Wrekin Local Plan
Spatial Area covered by the plan	The Local Plan Review will cover the Local Authority area. However, there will also be a need to consider cross boundary issues with neighbouring locations (especially those with a strong link to Telford and Wrekin).
Summary of content	The following document is an Interim IA report, which sets out the findings in relation to integrated appraisal at the current stage of plan-making.
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Figure 1.1 Telford and Wrekin District

1.2 What is Integrated Impact Assessment?

1.2.1 There are a range of impact assessment tools that can be used to assess how a plan, programme, project or particular development performs against a range of criteria. The common aim of these tools is to gain an understanding of impacts upon environmental, social or economic issues (or a combination of these); with the aim of achieving a better performing proposal overall.

1.2.2 Certain impact assessment tools are a legal requirement for when preparing particular plans, and this is the case for the Review of the Telford and Wrekin Local Plan (the Review). For example:

- A Sustainability Assessment / Strategic Environmental Assessment (SA/ SEA) which reviews and predicts how a proposal performs against a range of environmental and sustainability factors; whilst suggesting ways in which mitigation and enhancement measures can be taken into consideration.
- A Health Impact Assessment (HIA) as defined by the World Health Organisation is a practical approach to reviewing potential health effects of plans, policies and projects.
- An Equalities Impact Assessment (EqIA) reviews and seeks to ensure that equality and fairness is achieved in the delivery of services and how people experience life.
- Habitat Regulations Assessment seeks to any aspects of a Local Plan that would cause any adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites.

1.2.3 It is possible to undertake these processes separately, but often an integrated approach is taken. This is sensible given that there are considerable overlaps between the processes.

1.2.4 An integrated impact assessment (IIA) therefore helps to reduce duplication of efforts (and the number of separate reports); whilst taking advantage of the strengths of each impact assessment tool. In turn, this aids in undertaking effective consultation with interested parties.

1.2.5 To undertake a successful IIA it is important to set out the approaches clearly from the outset and to invite comments. This is one of the purposes of the Scoping Report.

1.2.6 It is also important to ensure that the IIA is closely aligned to plan-making activities so that it can guide / influence decisions in a meaningful and positive way.

1.3 Our approach to integration

- 1.3.1 SA/SEA can be regarded as the most comprehensive impact assessment tool with regards to plan-making in the UK. This is because it is enshrined in legislation and covers a wider range of factors other than just the HIA and EqIA.
- 1.3.2 For this reason, the SA / SEA process is typically used as the over-arching framework for which an integrated impact assessment is conducted. The requirements of HIA and EqIA are then woven into the SA process. This is the approach being taken for the Review.
- 1.3.3 Habitat Regulations Assessment (HRA) have entirely separate legislative drivers and purposes and will be a separate process but it would be incorporated into the IIA in the following ways. It has helped to inform the biodiversity section of this Scoping Report. It has been physically integrated with a copy of the HRA scoping report attached at Appendix II.

Meaningful integration

- 1.3.4 Integrated Impact Assessment should cover all the relevant sustainability factors that a plan could have significant effects upon. In this sense, health issues, equality and diversity issues and community safety issues would all typically be covered through the Sustainability Appraisal process.
- 1.3.5 However, IIA is not simply about including health, equality and community safety issues within a standard SA process; rather it should present nuanced approaches to data gathering and assessment within the broader framework of an SA. This ensures that the principles and methods of EqIA and HIA are captured properly, whilst using the SA as the overall approach to conduct the assessments.
- 1.3.6 For each step of the SA process, we have sought to reflect the requirements and benefits of HIA, EqIA and HRA in a meaningful, but proportionate way (Table 1.2).

Table 1.2: Integrated Impact Assessment stages and integration.

IIA Stage	How have HIA, EqIA and HRA been integrated?
	Specific baseline information presented for each group with protected characteristics.
Scoping	Information relating to health characteristics of affected populations have been included in a specific health and wellbeing chapter. Further health related baseline data is incorporated throughout the scoping report, with health and wellbeing forming a central theme and vulnerable 'receptors' being identified throughout.
	A focused literature review has been included for each topic area to demonstrate links to health and wellbeing.

IIA Stage	How have HIA, EqIA and HRA been integrated?
Appraisal framework / Methods	<p>A complete HRA scoping exercise has been completed and included at Appendix II.</p>
Appraisal of options	<p>The appraisal methodology includes several objectives relating to health, equality and biodiversity; with specific objectives set-out in the IIA framework.</p> <p>Sources of information, assumptions and team members that will undertake appraisals have been identified. This demonstrates how stakeholders with specific knowledge, experience and interest in health and equality factors will input to the appraisal process.</p> <p>Key stakeholders will be engaged to input to the assessment findings. This is important because HIA, EqIA and HRA work best when they involve people who can contribute different perspectives, knowledge and insight.</p>
Appraisal / screening of policies	<p>The options identification process will seek to identify whether there are approaches that are led by social value and health outcomes.</p> <p>Appraisal of options will report upon the implications with regards to health impacts and equality (through the Integrated Appraisal Process).</p> <p>The HRA will consider the whether a plan is 'likely to have a significant effect' on a European site.</p>
Mitigation and enhancement	<p>The Plan will be appraised against the IIA framework, with the primary aim of identifying significant effects. The IIA involves objectives and supporting questions that will interrogate the health and equality implications of the Plan.</p> <p>The HRA will consider the whether a plan is 'likely to have a significant effect' on a European site and consider the need for an appropriate assessment.</p> <p>Recommendations are made in SA, HIA and EqIA; each with the intention of avoiding and minimising negative effects and enhancing benefits.</p> <p>For the HRA where adverse effects are identified the HRA will recommend mitigation measures and alternative solutions.</p>

2. Scoping

2.1 Introduction

2.1.1 Scoping is undertaken as part of most impact assessment processes, and therefore, an integrated approach simply helps to combine the evidence gathering stages and devise appropriate methodologies.

2.1.2 As described above, the IIA uses the SA process as the over-riding structure to the approach. Therefore, the scoping exercise is arranged and presented in a similar way.

2.1.3 Essentially, scoping involves identifying a 'framework' of sustainability issues and objectives that should be a focus of, and provide a methodological framework for, the appraisal of the emerging plan (and reasonable alternatives).

2.1.4 In order to facilitate the identification of sustainability issues/objectives, scoping firstly involves review of the 'policy context' and 'baseline'. It is not a firm requirement to provide a review of literature as part of scoping. However, this is considered a useful exercise to help identify evidence to support any assumptions that are made about the nature of effects. Understanding research and real-world studies is also helpful in terms of feeding into the key issues identification process.

2.1.5 Scoping for the IIA therefore involves the following steps:

1. **Context review** - a review of existing policy and issues/objectives established by Government, the Council and other key organisations. This is broken down by the level at which the policy exists including; *international, national, regional, and local*.
2. **Focused literature review** – a focused review of relevant literature and research that demonstrates the links between different issues and how they interact with health.
3. **Baseline review** - a review of the current 'state of the environment, economy and society' and a consideration of how this might evolve in the absence of the plan. A review of key trends and anticipated impacts that existing/emerging Local Plans are likely to have.
4. **Key issues summary** - a summary of the key (*in the sense that the plan may have an effect*) problems and opportunities identified through steps (1), (2) and (3).
5. **ISA Framework development** - a refinement of the key issues into a set of sustainability objectives (and description of assessment methods).

2.1.6 As described in the previous section, the health, equality and ecology information gathered to support HIA, EqIA and HRA will be built into the wider ISA process. At this stage, the level of information is strategic, but further information can be gathered in support of more detailed assessments should this be deemed necessary.

2.2 Summary

- 2.2.1 A full Integrated Appraisal Scoping Report was prepared in 2020. The Scoping Report sets out a comprehensive review of the policy context and baseline information for a range of sustainability themes. This information has then been used to establish a series of 'key issues' for each sustainability topic and determine whether there is potential for significant effects (and should therefore be 'scoped-in' to the SEA process).
- 2.2.2 Following the decision to scope sustainability topics into the SEA process, a series of IIA Objectives and guiding assessment questions were established to form the basis for appraisal. Together, all of the objectives and supporting questions form the 'IIA framework'. The key issues and components of the IIA Framework for each of the IIA topics are summarised below. Where appropriate, focused updates have been made to the key issues reflecting new evidence and notable changes in the baseline.
- 2.2.3 Consultation on the IIA Scoping Report was undertaken between October 12th 2020 – November 16th 2020 with the statutory bodies (i.e. Historic England, Natural England, Environment Agency) and wider stakeholders. Comments received during this consultation were taken into consideration to update the scoping report and finalise the IIA framework.

2.3 Biodiversity

Key issues

2.3.1 The following key issues have been identified from the scoping exercise:

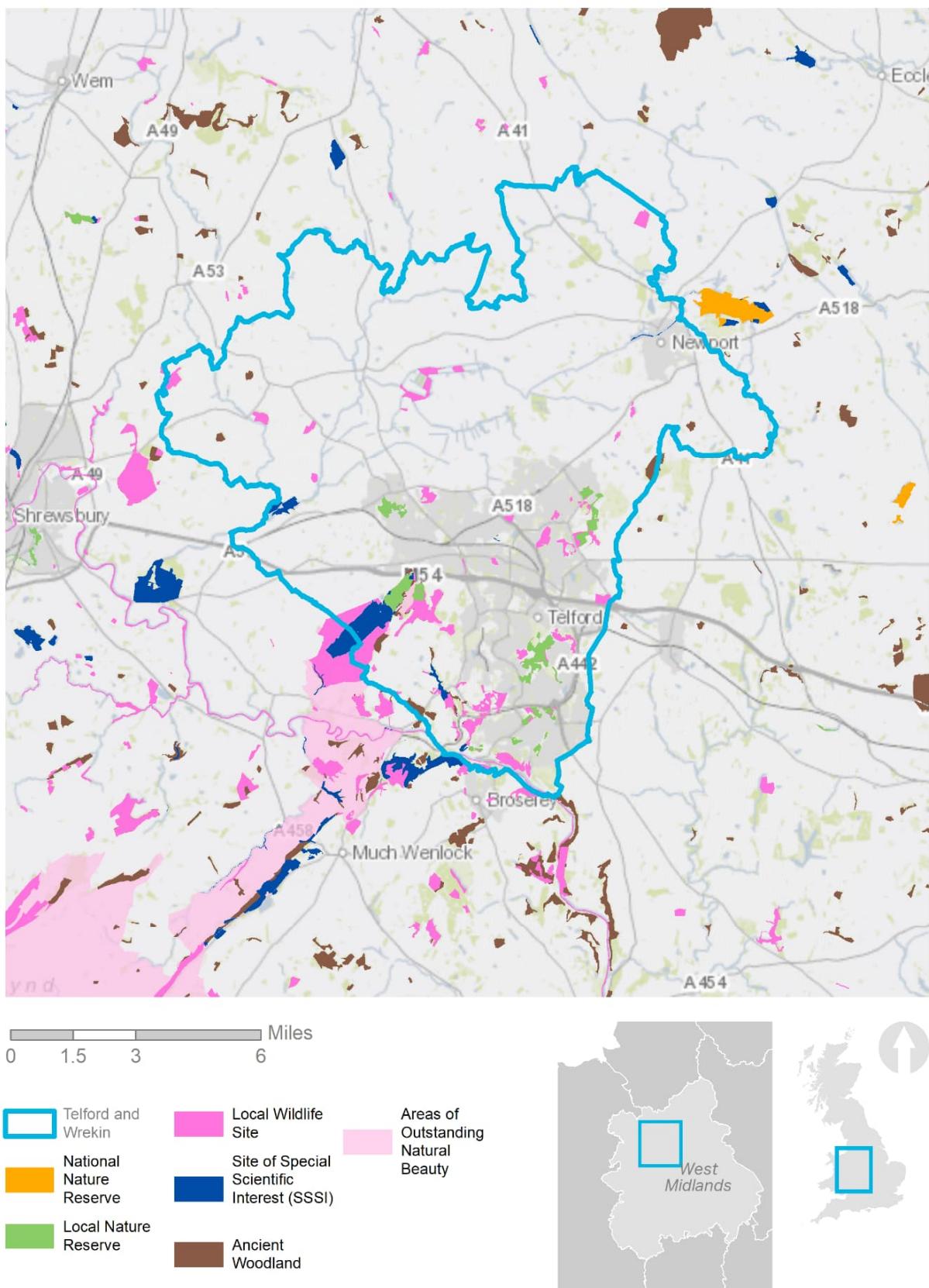
- There is a strong legislative and policy framework seeking to protect and enhance biodiversity. In particular there is a need to reverse the declines that have been experienced in biodiversity and to achieve 'net gain'.
- There is a body of evidence that demonstrates the link between access to biodiversity (particularly high quality and species diverse areas) and improved health and wellbeing.
- The borough contains many tranquil environments such as the Shropshire Hill AONB.
- There are a range of biodiversity assets across the Plan area (see Figure 2.1 below).

Scoping Decision

2.3.2 Considering the key issues discussed above it was proposed that the topic of biodiversity should be SCOPED IN to the integrated Appraisal. The following objective and supporting questions have been established as part of the IIA Framework.

IIA objectives	Assessment questions (will the option/ proposal help to...)
Minimise, and avoid impacts upon biodiversity whilst achieving net gains through enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.	<ul style="list-style-type: none"> • Avoid unacceptable harm to key biodiversity assets? • Avoid severing ecological corridors? • Improve the resilience of ecosystems to climate change and other pressures? • Achieve net gain in biodiversity value? • Seek to help improve the conditions of unfavourable assets? • Recognise the multiple ecosystem services that biodiversity provide? • Ensure communities benefit from interaction with wildlife without generating unacceptable harm to species and habitats?

Figure 2.1. Biodiversity Assets across Telford and Wrekin, 2020.



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2.4 Air quality

Key issues

2.4.1 The following issues have been identified from this scoping exercise:

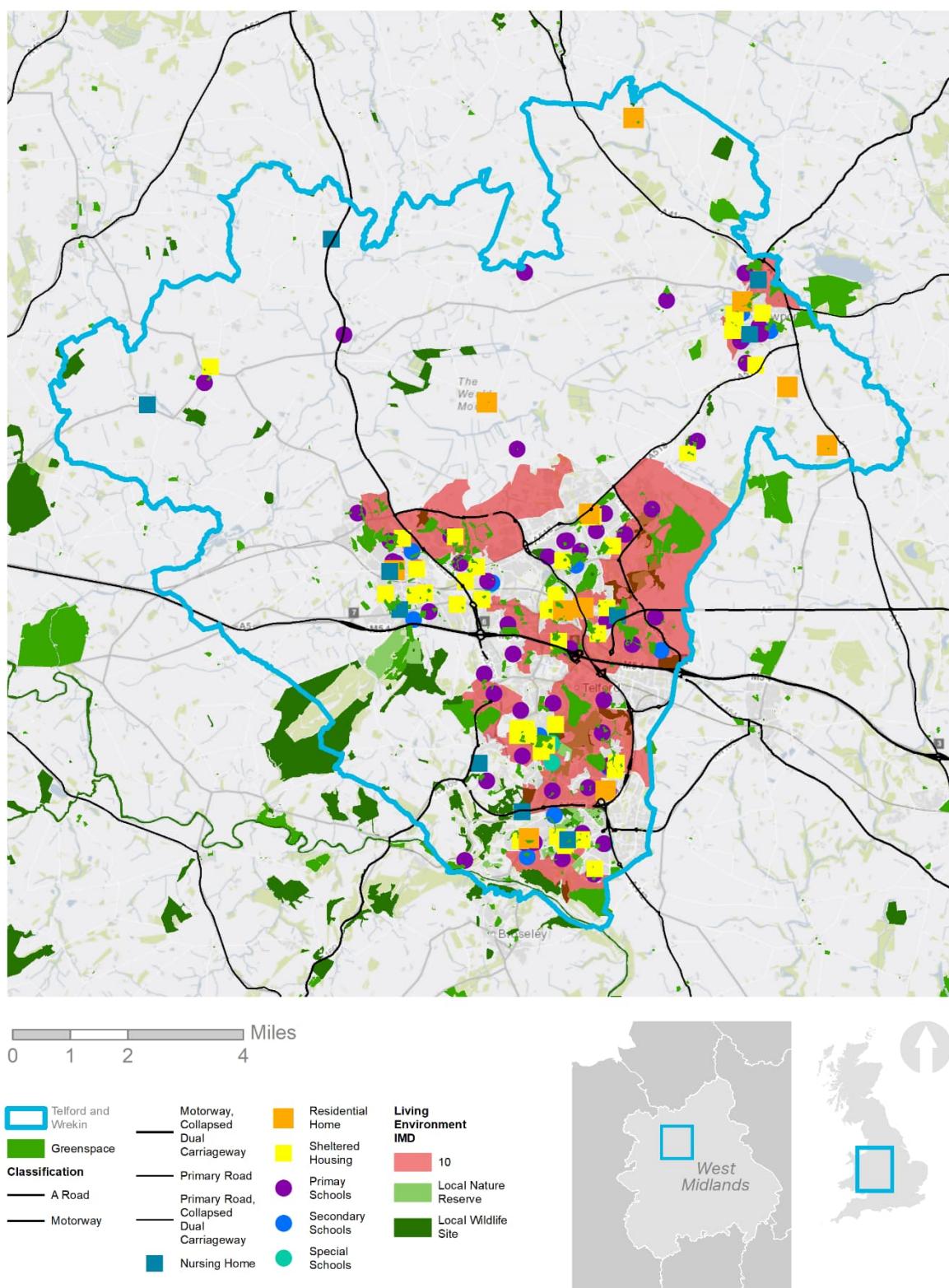
- There is a clear legislative and policy framework that demonstrates air quality is closely related to a number of adverse health impacts and recognises poor air quality as a key contributor to heart diseases and cancer.
- There are currently no AQMAs within the local plan area, however regular monitoring occurs in areas that are of some concern including the Watling Street/Mill Bank area.
- The main areas of concern for air quality within Telford and Wrekin are busy roads such as the M54, A41, A518, A5, A442, A4169, A4640. Areas within close distance to these networks may be at risk/ vulnerable to poorer air quality.
- Overall, air quality within the borough of Telford and Wrekin has been shown to have very good compliance with the National Air Quality Objectives (NAQO) and European Directive limit and target values.
- There are vulnerable communities across Telford and Wrekin that are more likely to experience the negative effects of air pollution. This is particularly the case in parts of Telford and Wrekin that exhibit several risk factors such as deprivation, respiratory illnesses and less access to greenspace (see Figure 2.2).

Scoping decision

2.4.2 Considering the key issues discussed above it is proposed that the topic of air quality should be **SCOPED OUT** of the integrated Appraisal.

2.4.3 The borough has generally good levels of air quality, and no major areas of concern. Therefore, whilst air quality is an important issue, and there is a recognised need to provide clean air, it is considered unlikely that significant effects will arise as a result of the Local Plan Review.

Figure 2.2 Vulnerable communities within Telford and Wrekin in relation to major roads, greenspace and living environment deprived areas.



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2.5 Water quality

Key issues

2.5.1 The following key issues emerge from the context and baseline review:

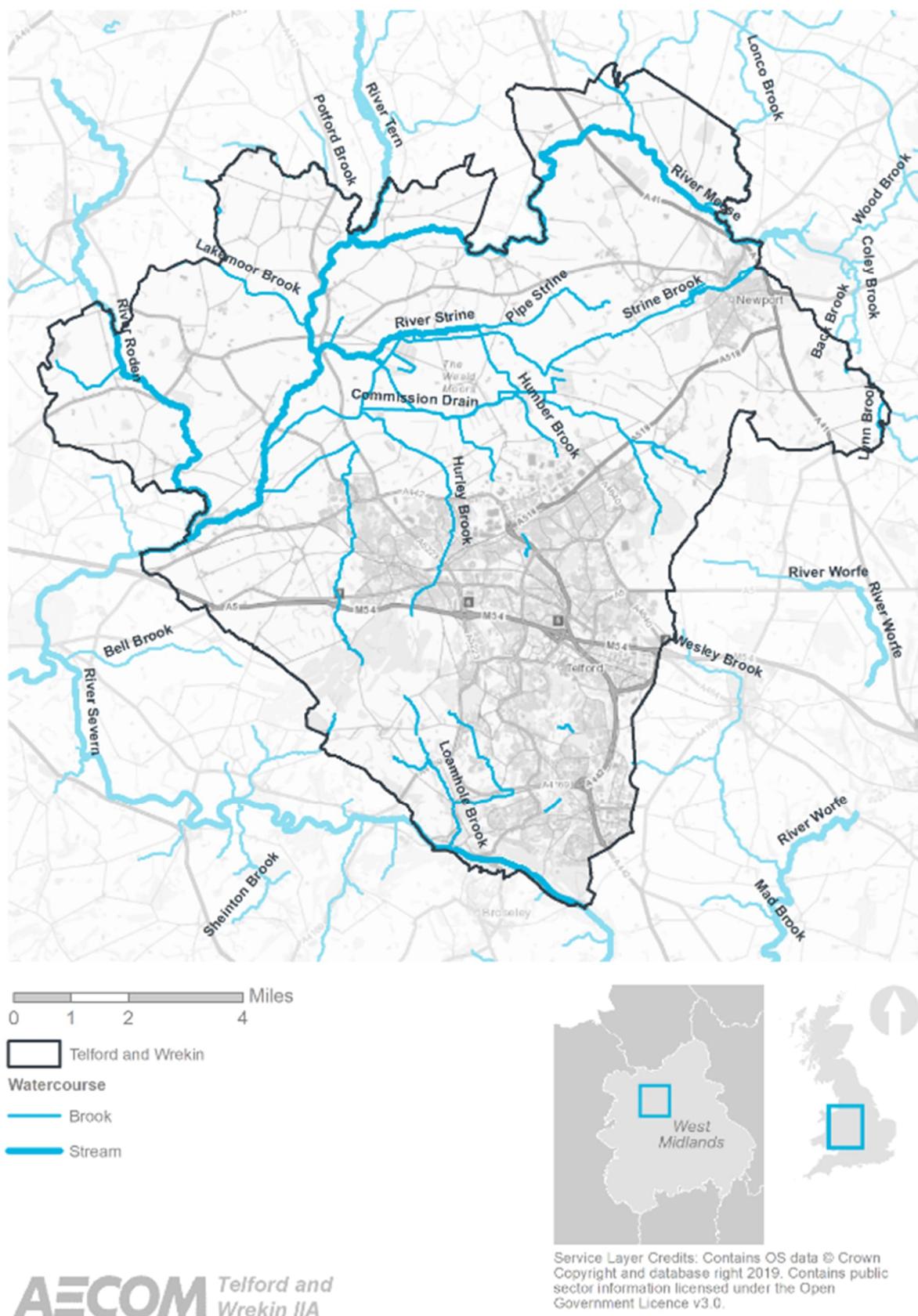
- The entire borough falls within the Severn River Basin and is provided by both potable and wastewater services by Severn Trent (See Figure 2.3).
- The quality of watercourses across the Local Plan area is generally good in terms of chemical status. In terms of ecological quality, the sites are mostly a mix of poor quality and moderate quality.
- The Local Plan area does not appear to be water stressed and Severn Trent have recently taken action to ensure the ongoing sustainability of supply to Telford by increasing output at the Uckington borehole.
- No issues emerge in relation to headroom capacity at wastewater treatment works serving the borough. However, future development needs to be planned for proactively.

Scoping Decision

2.5.2 Considering the key issues discussed above it is proposed that the topic of water resources should be **SCOPED IN** to the Integrated Appraisal. The following objective and supporting questions are proposed as part of the IIA Framework.

IIA objectives	Assessment questions (will the option/ proposal help to...)
Promote sustainable forms of development which minimise pressure on water resources, whilst maintaining and enhancing the quality of the Borough's rivers, lakes and aquifers.	<ul style="list-style-type: none"> • Maintain areas with good water quality and make improvements where necessary? • Promote the role of water resources for their recreational and economic benefits without compromising environmental quality? • Promote the integration of blue infrastructure into new developments? • Ensure the timely phasing of wastewater and drainage infrastructure improvements to support new development?

Figure 2.3 Key watercourses in Telford and Wrekin



2.6 Soil and land

Key Issues

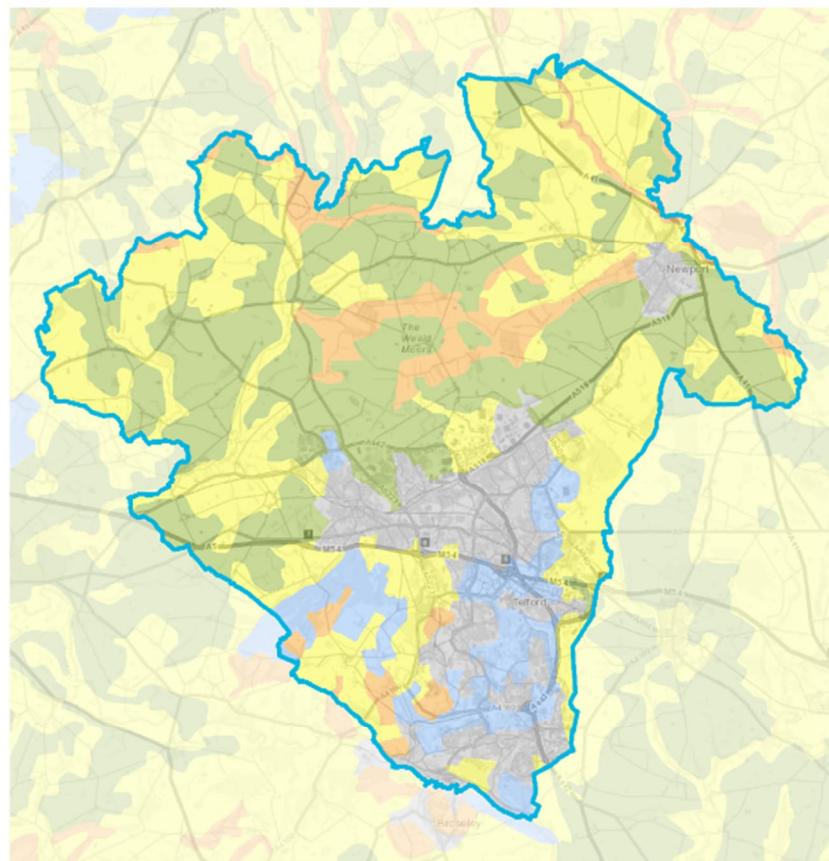
2.6.1 The following key issues emerge from the context and baseline review:

- There is clear direction from national, regional and adopted local policy that significant new growth should be directed to areas of poorer quality land and away from areas of best and most versatile agricultural land.
- Much of rural area of the borough is underlain by Grades 2 and 3 agricultural land, and detailed survey data reveals that land at the north and north western periphery of Telford is predominantly of Grades 2 and 3a. Notably poorer quality land is evident at the western and south western periphery of the Telford urban area (see Figure 2.4).
- Housing completions on previously developed sites in the borough have averaged 44% of total completions over the last five years, though within this period the annual proportion of total completions on PDL land has fallen in each of the last four years.
- Minerals deposits beneath the plan area are extensive in both total area and variety, though minerals extraction is limited to just two operational sites.

Scoping Decision

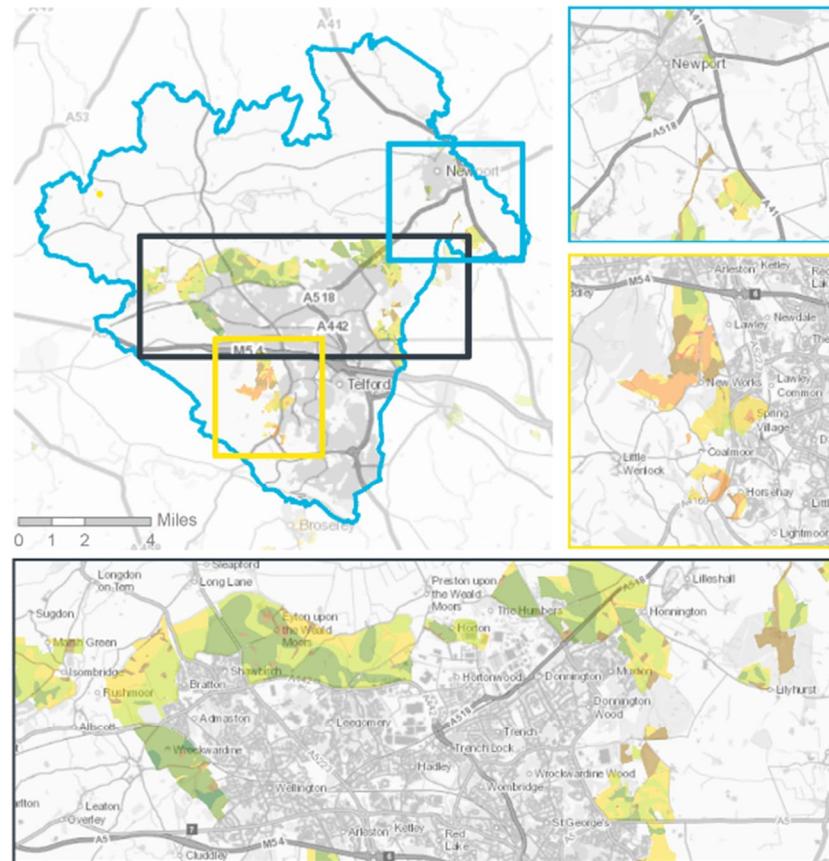
2.6.2 Considering the key issues discussed above it is proposed that the topic of soil and land should be **SCOPED IN** to the Integrated Appraisal. The following objective and supporting questions are proposed as part of the IIA Framework.

IIA objective	Assessment questions (will the option/ proposal help to...)
Promote the effective use of land and soil, ensuring that the best and most versatile agricultural land resources are protected and used effectively, whilst also preserving minerals resources.	<ul style="list-style-type: none"> • Promote the use of previously developed land where this exists as a viable alternative to greenfield development? • Avoid the loss of the highest quality agricultural land (particularly, where there are poorer quality alternatives)? • Promote the effective use of agricultural land for temporary uses where soil quality can be retained? • Promote community food growing and greater self-sufficiency? • Avoid the unnecessary sterilisation of minerals deposits and associated infrastructure?



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Figure 2.4
Agricultural land classification

2.7 Landscape

Key issues

2.7.1 The following key issues emerge from the context and baseline review:

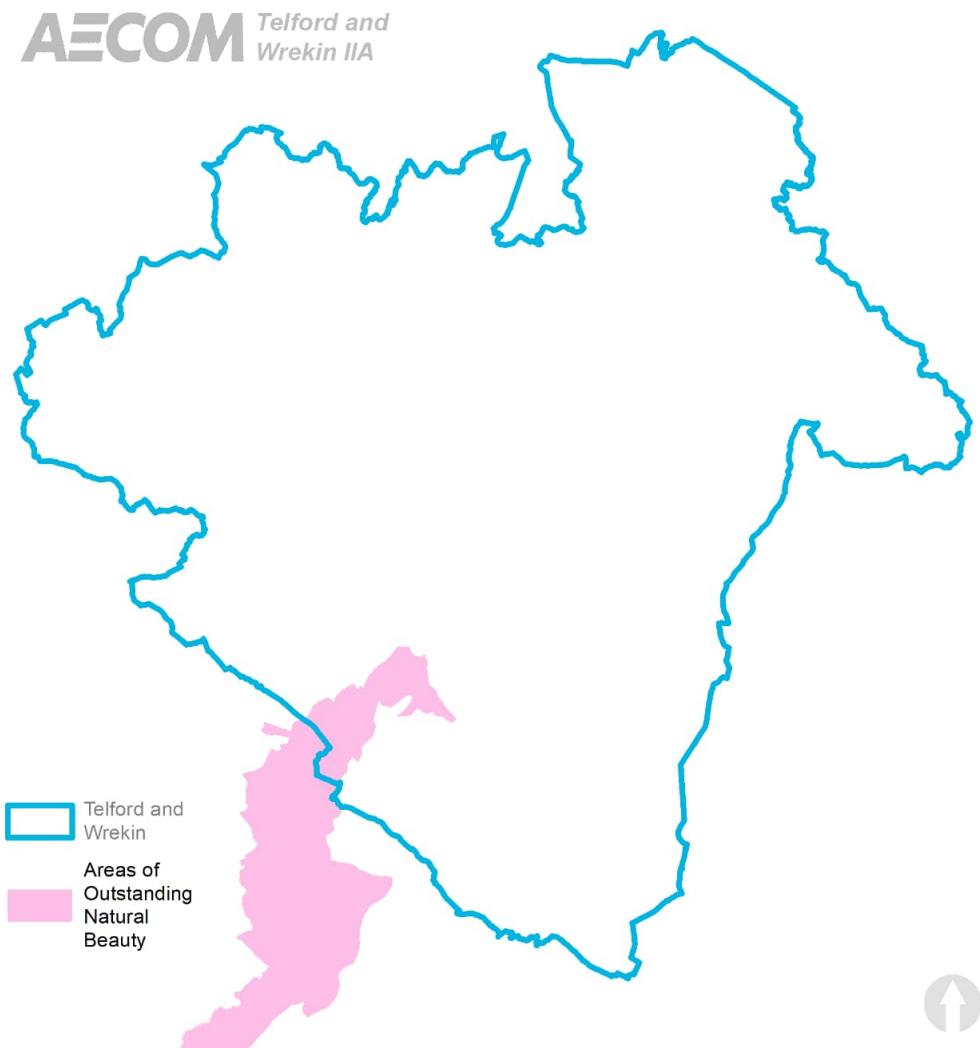
- There is a need to protect and enhance landscape and townscape character as it contributes towards environmental protection, enhancement and communities health and wellbeing.
- The ability to experience tranquil environments in countryside settings is important to local communities and their health and wellbeing.
- There is an AONB landscape within Telford and Wrekin boundary (see Figure 2.5. Protection of this asset will be of high importance, among other historical, geographical and environmental assets.
- Landscape sensitivity studies have previously reviewed development site options from the 2012 SHLAA. There will be a need to produce a landscape sensitivity study, and even monitor effects from previous recommendations to current state of landscape environments as these will have likely changed.
- The effects of climate change upon landscapes will need to be taken into consideration.

Scoping Decision

2.7.2 Considering the key issues discussed above it is proposed that the topic of landscape should be **SCOPED IN** to the integrated Appraisal. The following objective and supporting questions are proposed as part of the IIA Framework.

IA objective	Assessment questions (will the option/ proposal help to...)
Protect and enhance the character of landscapes and townscapes; whilst ensuring their multifunctional use and enjoyment by all.	<ul style="list-style-type: none"> • Preserve and strengthen areas of tranquillity throughout the borough? • Protect and enhance access to high quality green and open space in urban areas? • Enhance poor quality landscapes and townscapes? • Protect sensitive landscapes that makes a positive contribution to landscape character and provide recreational opportunities? • Consider effects of climate change on landscape environments?

Figure 2.5 Areas of Outstanding Natural Beauty (AONB) 2019 – Shropshire Hill AONB.



2.8 Historic Environment

Key issues

2.8.1 The following key issues emerge from the scoping exercise:

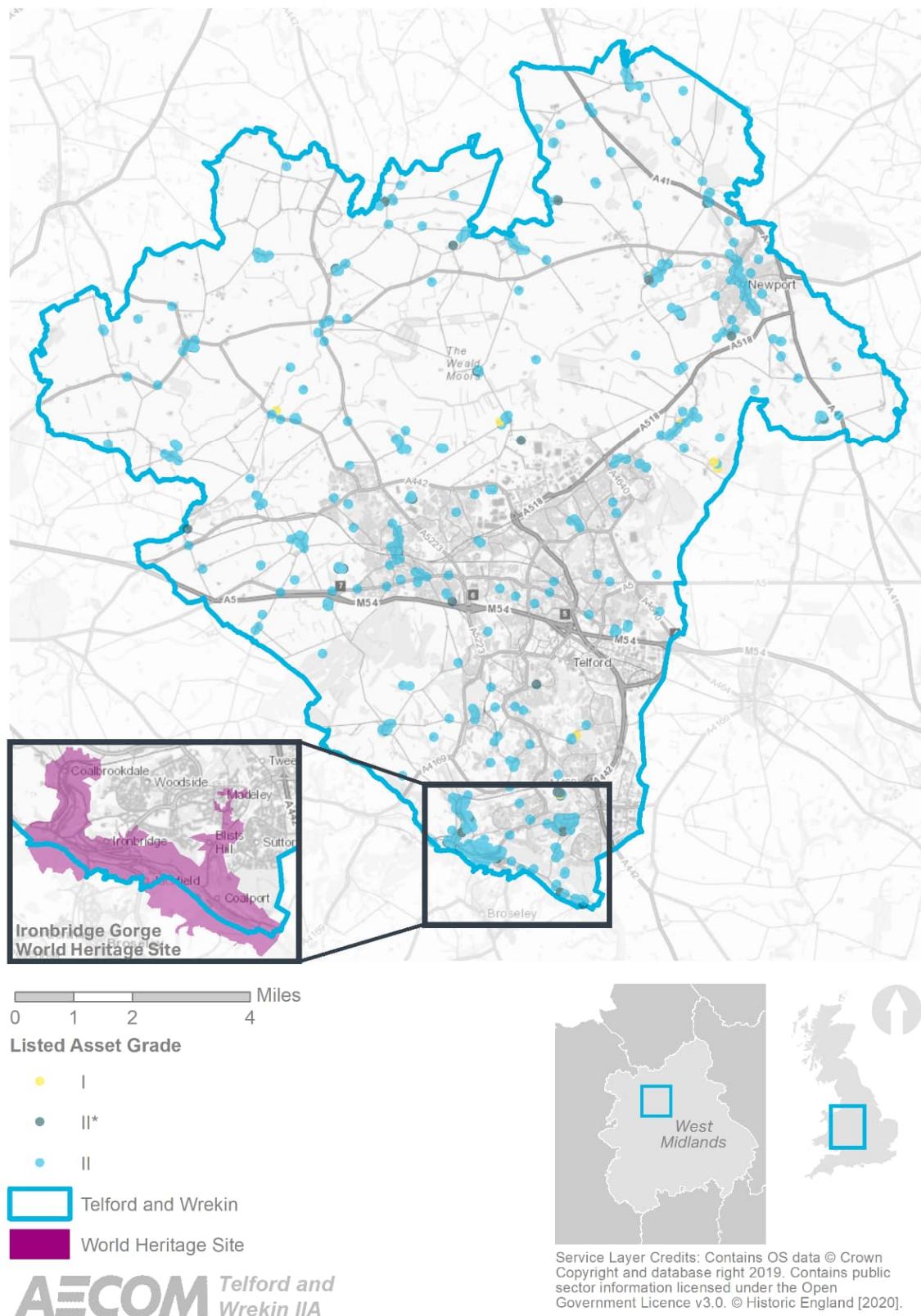
- The policy context makes it clear that the protection and enhancement of the historic environment is important.
- Historic features and cultural heritage can contribute towards sense of community and wellbeing.
- The West Midlands historic manufacturing and industrial history should be recognised as important to the area's identity when considering how industry develops in the future.
- Ironbridge (including Ironbridge Gorge World Heritage Site), Woodside and Coalbrookdale have the highest concentration of listed assets.
- The Borough's listed assets are spread across the urban and rural areas (see Figure 2.6).
- The heritage assets identified as at risk are located predominantly to the east and west of the Borough.

Scoping Outcome

2.8.2 Considering the key issues discussed above it is proposed that the topic of historic environment should be **SCOPED IN** to the integrated Appraisal. The following objective and supporting questions are proposed as part of the IIA Framework.

IIA objective	Assessment questions (will the option/ proposal help to...)
Protect, maintain and enhance heritage assets (including their setting), cultural heritage and natural history.	<ul style="list-style-type: none"> • Protect historic assets and their settings? • Support patterns of growth that are in keeping with settlement character? • Recognise and promote the role of the historic environment in contributing to community identity?

Figure 2.6 Heritage assets in Telford and Wrekin



2.9 Waste

Key issues

- Key policies for the area aim to reduce the waste produced, process it in a more environmentally friendly way and maximise energy production and overall efficiency from the entire process.
- Literature reinforces the importance of waste management which is as environmentally friendly as possible, acknowledging the importance of this and its links to human health and wellbeing.
- The Borough has a significantly lower than average overall waste production, with a moderately lower rate when the figure is a factor of the population.
- The Borough produces significantly less non-household waste per person than regional and national averages. Of this waste, recycling/composting/reuse rates are marginally higher than regional and national equivalents.

Scoping Outcome

2.9.1 Considering the key issues discussed above it is proposed that the topic of waste should be **SCOPED IN** to the integrated Appraisal. The following objective and supporting questions are proposed as part of the IIA Framework.

IIA objective	Assessment questions (will the option/ proposal help to...)
Minimise waste generation and support the circular economy by implementing the waste hierarchy.	<ul style="list-style-type: none"> • Reduce waste generation associated with new development. • Promote the use of secondary materials. • Support the management of waste close to sources of generation. • Ensure that negative health impacts associated with waste management are avoided.

2.10 Climate change

Key issues

2.10.1 The following key issues emerge from the scoping exercise:

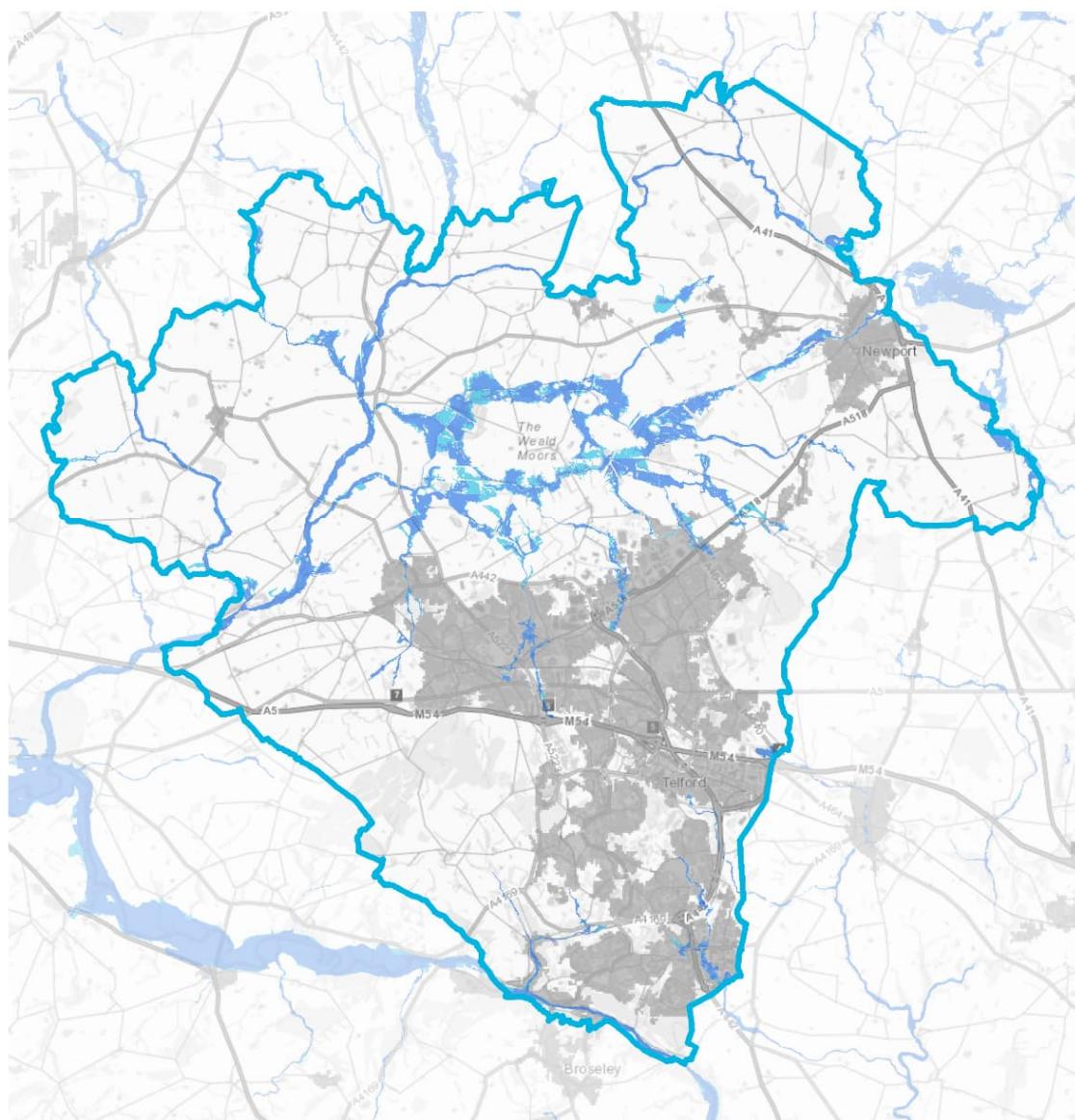
- National, regional and local policy reinforces the need for all aspects of life to be able to adjust to the challenging circumstances which climatic change will present.
- Climate change and its effects will have dramatic influence upon all aspects of life, including social, economic and environmental factors.
- Urban areas are more vulnerable to both fluvial and pluvial flooding in Telford and Wrekin (see Figure 2.7).
- Recent persistent flood events have raised specific concerns about vulnerabilities in the south of the Borough, along the River Severn.

Scoping Outcome

2.10.2 Considering the key issues discussed above it is proposed that the topic of climate change resilience should be **SCOPED IN** to the integrated Appraisal. The following objective and supporting questions are proposed as part of the IIA Framework.

IIA objective	Assessment questions (will the option/ proposal help to...)
Adapt and become more resilient to the impacts of climate change, including directing growth away from areas of highest flood risk and preparing for more extreme weather events.	<ul style="list-style-type: none"> • Ensure that development does not increase flood risk on site or downstream? • Implement multifunctional green infrastructure? • Ensure that critical infrastructure is resilient to the effects of climate change? • Avoid vulnerabilities to flood risk, considering locally specific circumstance? • Locate development in appropriate locations?

Figure 2.7 Fluvial flood risk



0 1 2 3 4 Miles

- █ Telford and Wrekin
- █ Flood Zone 3
- █ Flood Zone 2
- █ Built-Up Areas



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2.11 Climate change mitigation

Key Issues

2.11.1 The following key issues emerge from the scoping exercise:

- Policy at all scales focuses on the need to decarbonise all pillars of human activity in order to prevent planetary warming which would have catastrophic effects.
- Literature backs up the need for this and links it to the need for energy efficiency, the effects of this on health and vulnerable populations.
- Telford and Wrekin generates more renewable energy per household than regional figures, but less than national.
- Photovoltaic, landfill gas and anaerobic digestion are the Borough's key renewable energy generating sources (See Figure 2.9). There may be opportunities to diversify or build upon existing opportunities.
- Carbon emissions have declined since 2005 across all sectors, with transportation the only one to have risen very marginally in the past 5 years (Figure 2.8).

Scoping decision

2.11.2 Considering the key issues discussed above it is proposed that the topic of climate change resilience should be **SCOPED IN** to the integrated Appraisal. The following objective and supporting questions are proposed as part of the IIA Framework.

IIA objective	Assessment questions (will the option/ proposal help to...)
Facilitate and contribute to the move towards a zero carbon Telford and Wrekin whilst improving social equity of access to energy.	<ul style="list-style-type: none"> • Avoid the sterilisation of renewable energy opportunities by locating incompatible development in areas with greatest suitability for generation? • Support the continued growth in renewable energy generation across Telford and Wrekin, particularly where opportunities exist? • Continue to drive down greenhouse gas emissions associated with transport, housing and business? • Reduce energy consumption? • Decouple energy consumption and affluence? • Ensure affordable access to energy for all members of the community? • Lead to greater self-sufficiency?

Figure 2.8: Overall carbon emissions per capita from all sources. Source: DBEIS, 2018.

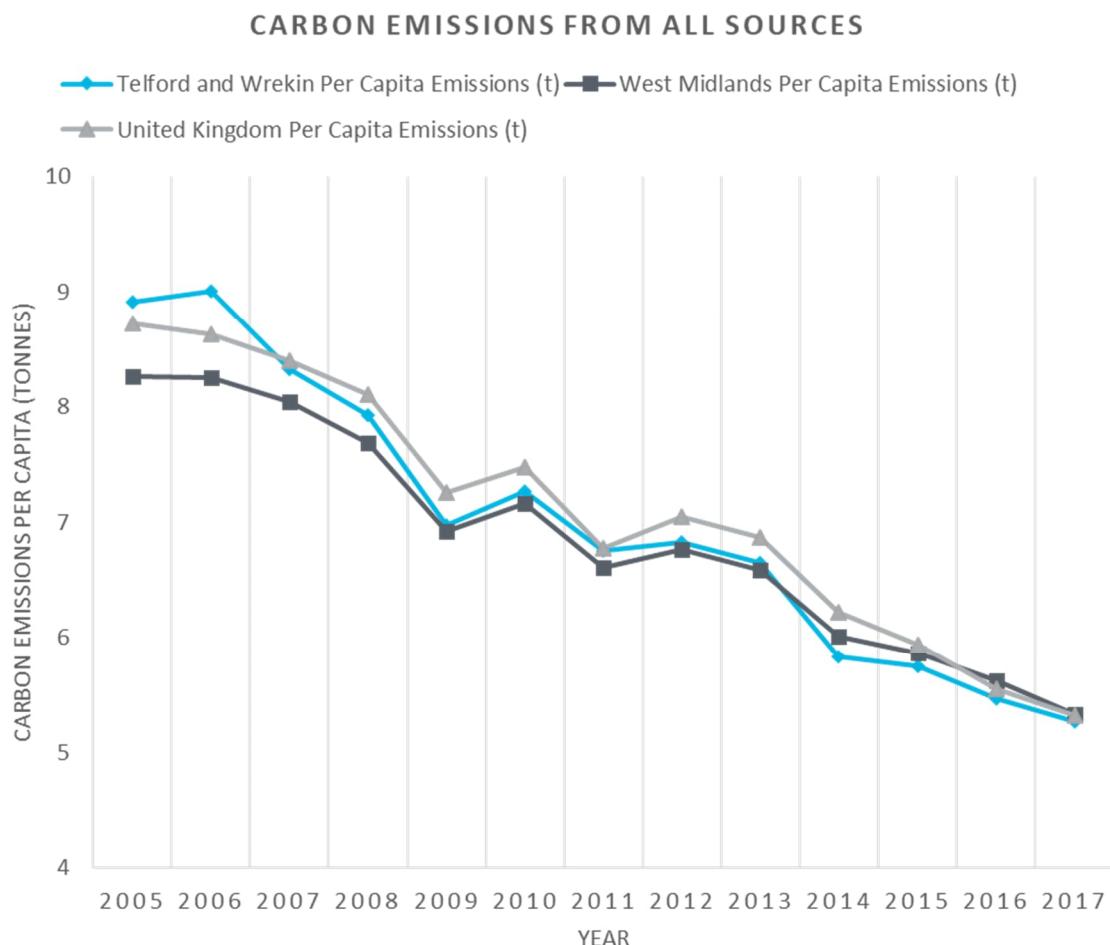
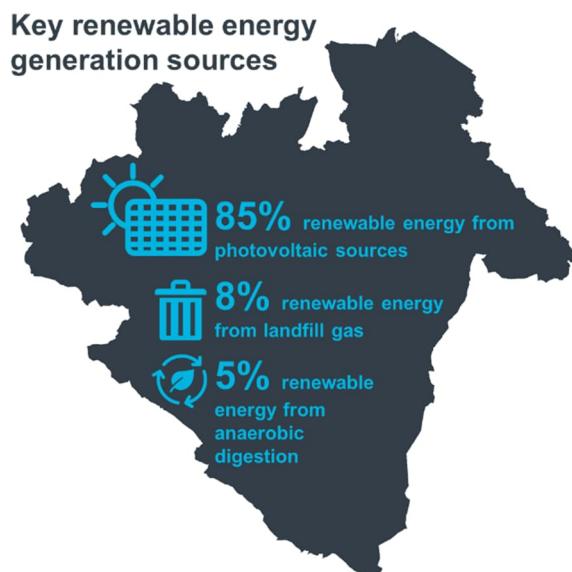


Figure 2.9 Key renewable energy generation sources for Telford and Wrekin.



2.12 Housing

Key Issues

2.12.1 The following key issues emerge from the context and baseline review:

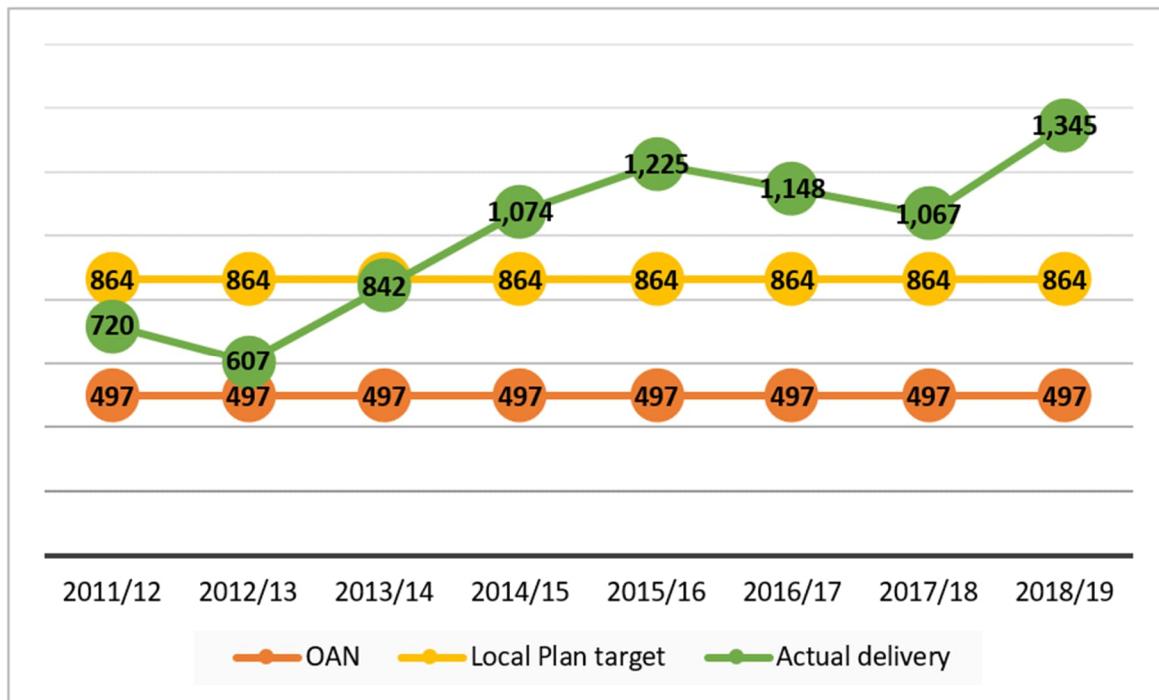
- Telford and Wrekin has achieved high and sustained rates of housing completion for several years, consistently delivering well above identified levels of overall housing need and above the housing target in the adopted Local Plan (see figure 2.10). Objectively assessed need is 497 dpa, whilst average delivery since 2011/12 is around 1,003 dpa.
- Within the overall level of housing completions, consistently high delivery of affordable housing is also evident, averaging 311 affordable dpa since 2011/12.
- The vast majority of this housing growth has taken place within the contiguous Telford urban area, with more limited growth at the secondary settlement of Newport. Very limited growth has taken place across the rural areas.
- There is evidence of clusters of poorer quality housing in central, northern and north western Telford, while rates of poor quality housing are much lower in the rural areas, particularly in the far north of the borough.
- Affordability of housing is a key issue, with notable disparities in affordability evident between the urban areas of the borough and the rural areas.

Scoping outcome

2.12.2 Considering the key issues discussed above it is proposed that the topic of housing should be **SCOPED IN** to the Integrated Appraisal. The following objective and supporting questions are proposed as part of the IIA Framework.

IIA objective	Assessment questions (will the option/ proposal help to...)
Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential of brownfield opportunities, to ensure delivery of high quality housing that meets the needs of Telford and Wrekin residents.	<ul style="list-style-type: none"> • Support timely delivery of an appropriate mix of housing types and tenures to meet objectively assessed housing need in the most sustainable locations ? • Maximise potential from brownfield opportunities in the borough, including unlocking opportunity sites in public ownership? • Support delivery of a range of good quality, affordable and specialist housing that meets the needs of Telford and Wrekin's residents, including older people, people with disabilities and families with children? • Enable managed growth at rural communities where to do so would help improve the sustainability of these settlements?

Figure 2.10: Annual housing delivery versus OAN and adopted Local Plan housing target



2.13 Health and wellbeing

Key issues

2.13.1 The following key issues emerge from the scoping exercise:

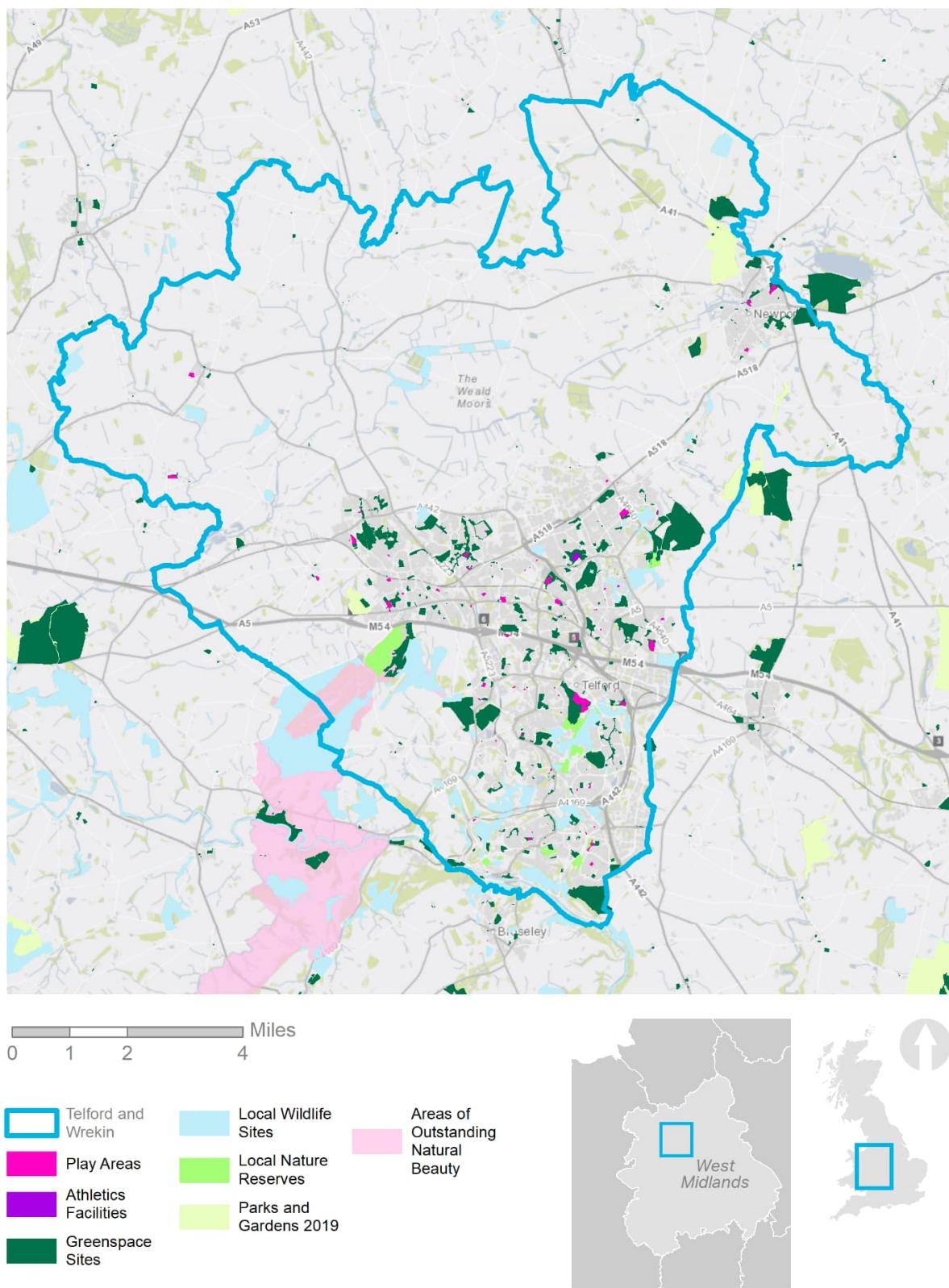
- Supporting healthy lifestyles, promoting access to green infrastructure, and tackling health inequality are key policy drivers at a national, regional and local level.
- There should be a greater focus on changing behaviours and encouraging active, healthy lifestyles, particularly in areas of greatest need.
- There is a focus on children's health and maternity as it is highly important children start their lives with healthy, nurturing environments. These habits could potentially link back to elements such as crime rates, increased health support and mental illness later on in life.
- Overall crime rates are higher than the national averages within the borough.
- There are several areas within the borough that are in need of enhanced greenspace and open space to promote healthy living, recreation and wellbeing (see Figure 2.11).
- Overall, the socio-economic balance is contrasting within the borough as some urban areas are considered the most deprived in the country whilst others are amongst the least deprived (Figure 2.12).

Scoping decision

2.13.2 Considering the key issues discussed above it is proposed that the topic of health and wellbeing should be **SCOPED IN** to the integrated Appraisal. The following objectives and supporting questions are proposed as part of the IIA Framework.

IIA objectives	Assessment questions (will the option/ proposal help to...)
Support healthy, safe lifestyles and environments for all community groups; whilst seeking to close 'inequality gaps' and improve resilience to health issues.	<ul style="list-style-type: none"> • Ensure there is adequate access to open/ green space facilities across all areas within the local plan boundary. • Ensure that recreational spaces are kept to a high quality standard, are accessible and able to provide for required demands. • Ensure that places are designed that allow social distancing measures to be employed effectively. • Improve active transport accessibility to suitable housing, employment opportunities. • Reduce inequalities in health between the most and least deprived areas. • Support active travel. • Support mental health trends and continues to plan for and acknowledge mental health issues.

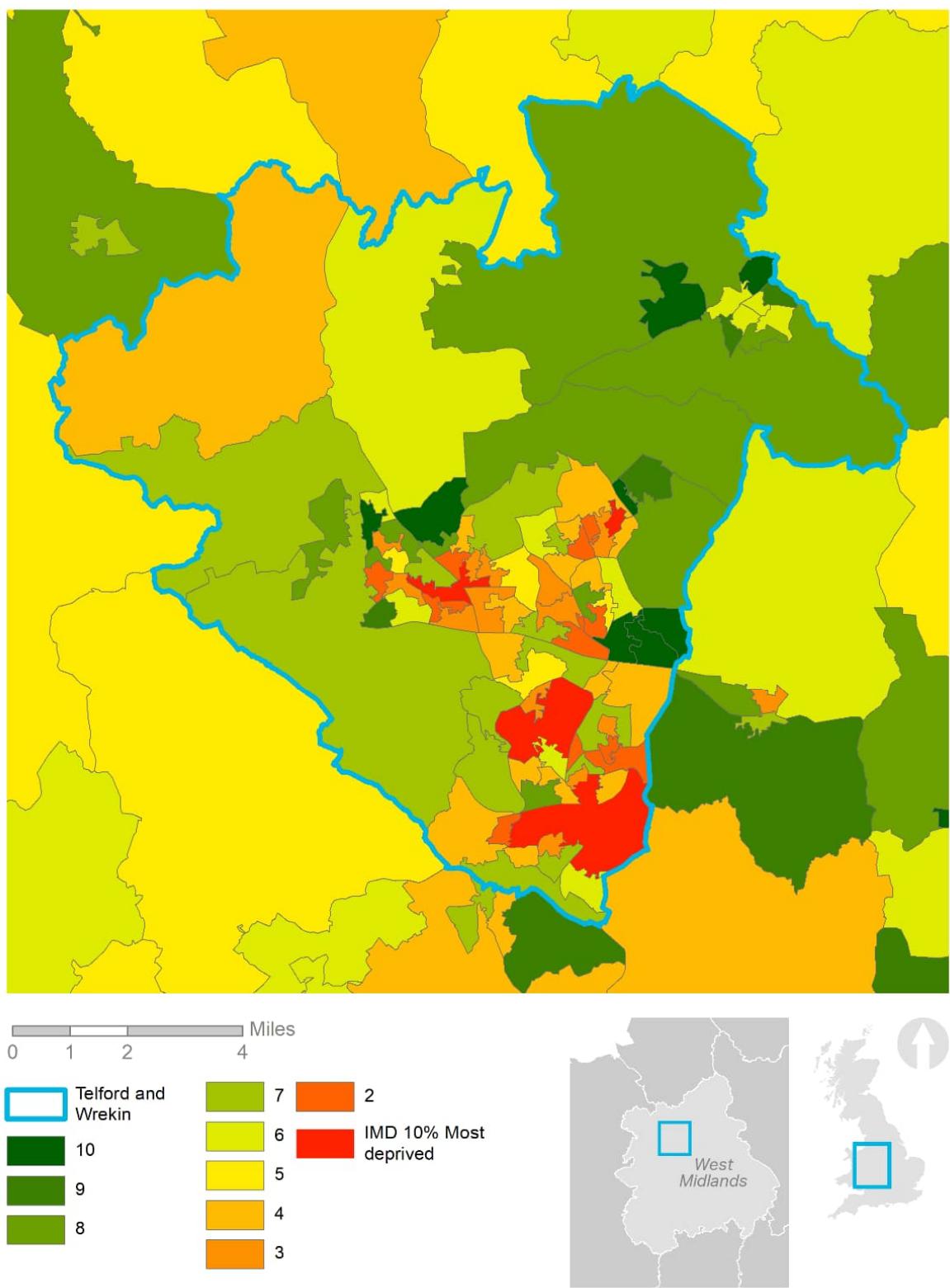
Figure 2.11: Access to sporting facilities / parks / recreation / open green space



AECOM Telford and Wrekin IIA

Service Layer Credits: Contains OS data © Crown Copyright and database right 2019

Figure 2.12: Telford and Wrekin – Index of Multiple Deprivation, 2019.



AECOM Telford and Wrekin IIA

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2.14 Economy and infrastructure

Key Issues

2.14.1 The following key issues emerge from the scoping exercise:

- Policy and literature reinforce the need for a healthy economy to support the wellbeing of a population.
- There is a growing need to decarbonise the economy and ensure that equitable growth is focused on a thriving local economy.
- Telford and Wrekin and the West Midlands have key economic drivers which focus on manufacturing/industry, physical and digital connectivity, healthcare and defence.
- It is evident that it is vital to ensure that new economic development appropriately mitigates its negative impacts, such as increased congestion or loss of open, green space.
- Telford shows signs of deprivation in terms of skills, education and income with a mixture of deprived and non-deprived areas across the built-up area, suggesting more isolated pockets of wealth/deprivation.
- The Borough is broadly less well qualified than nationally.
- GVA per head is in line with regional equivalents and marginally lower than national averages (Figure 2.13).
- Telford and Wrekin has marginally lower than average rates of self-employment.
- The Borough has higher than average rates of economically active people who are classified as long-term sick and retired.
- Shropshire is the Borough's key origin and destination for commuter patterns.
- Ironbridge World Heritage Site as well as other historic, natural and leisure attractions are the Borough's key tourism assets.
- Telford and Newport are the two main retail centres.
- Digital connectivity is significantly better in the built-up areas of Telford and Newport.

Scoping decision

2.14.2 Considering the key issues discussed above it is proposed that the topic of economy and employment should be **SCOPED IN** to the integrated Appraisal. The following objectives and supporting questions are proposed as part of the IIA Framework.

IIA objective	Assessment questions (will the option/ proposal help to...)
<p>Ensure that the local economy is equipped to support key local industries which bring tangible benefits to the lives of local residents whilst ensuring environmental degradation is minimised and social equity is achieved.</p>	<ul style="list-style-type: none"> • Ensure that adequate skills, education and training are in place to meet the needs of the local economy? • Reduce the polarised nature of urban inequalities? • Boost self-employment through schemes designed to support entrepreneurial activity? • Reduce the economic and healthcare costs of people classified as long-term sick? • Boost the number of managerial and professional occupations in the Borough? • Improve digital connectivity? • Ensure the protection of the natural, historic and leisure attractions the Borough has to offer? • Ensure the longevity of the Borough's retail centres?

Figure 2.13: Local authority GVA and GVA per head. Source: ONS, 2017.



2.15 Transportation

Key issues

2.15.1 The following key issues emerge from the context and baseline review:

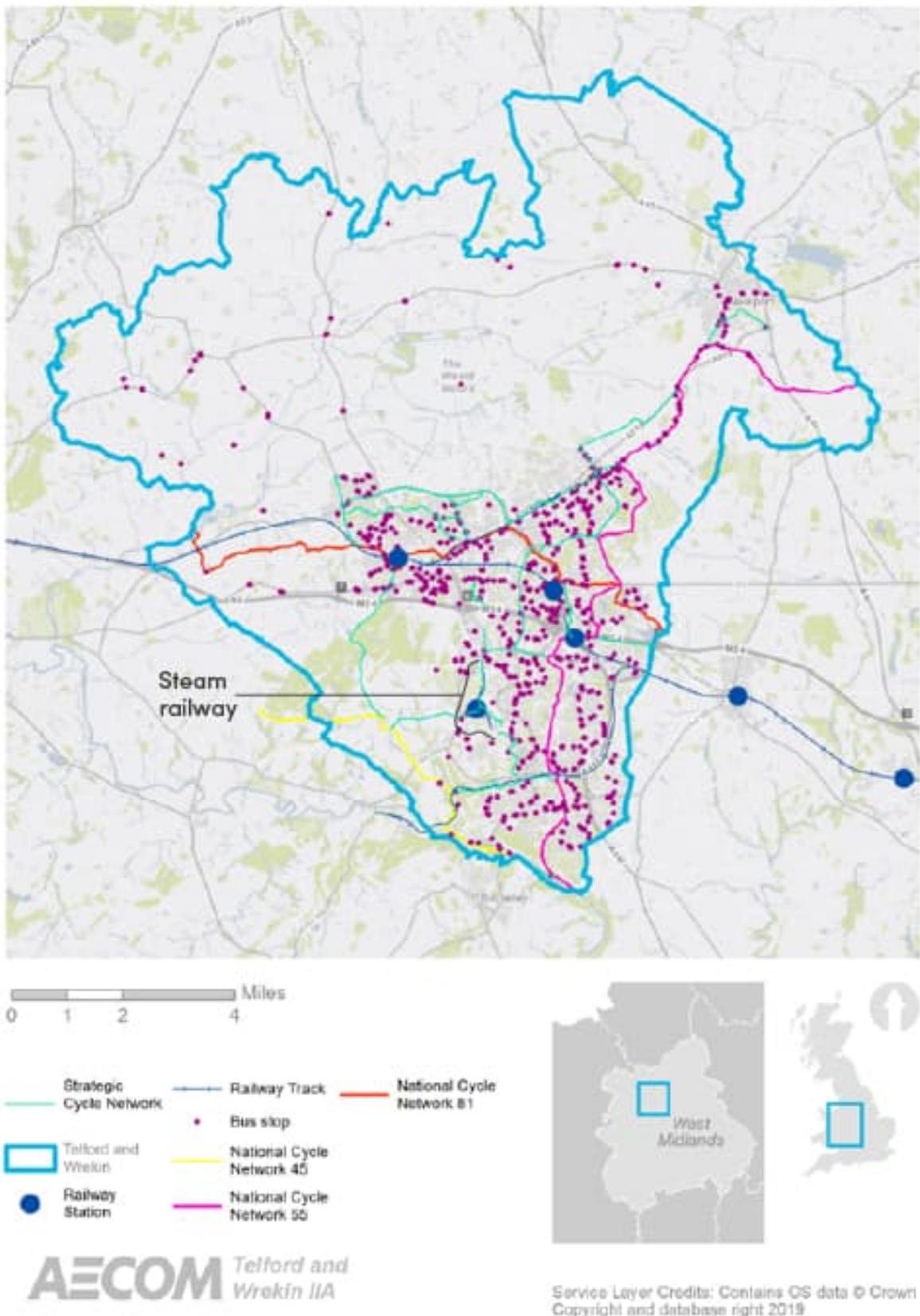
- There are various modes of travel within Telford and Wrekin, but using a car and driving to work tends to be the most favoured mode of transport.
- There are opportunities to expand and improve active transport corridors throughout the borough in particular in the urban areas towards the south where there may be a greater need for active travel in terms of health and wellbeing (Figure 2.14).
- There are investments and grants for transport network improvements, some of which have already occurred within the town centre and rail station. This should improve transport connections across the borough to the wider region.
- It is important to ensure the health and wellbeing of residents is met through creating longer-term behavioural changes in exercising and commuting. Many trips throughout the borough are within close proximity to one another and therefore there are opportunities to improve local scale active transport.

Scoping Decision

2.15.2 Considering the key issues discussed above it is proposed that the topic of transportation should be **SCOPED IN** to the integrated Appraisal. The following objectives and supporting questions are proposed as part of the IIA Framework.

IIA objective	Assessment questions (will the option/ proposal help to...)
Ensure that provision of transport infrastructure reflects local population and demographic needs, promotes sustainable modes of travel, connects new housing to employment, education, health and local services and maximises accessibility for all.	<ul style="list-style-type: none"> • Improve transport infrastructure throughout the borough including active and public transport? • Meet future transport trends and service those of all abilities? • Encourage active transport to improve the communities health in the longer term, whilst benefiting the environment? • Improve transport to ensure sustainable and active modes are most desired as used to connect people to places? • Support home working and positive changes in travel behaviours that emerge in response to crises such as Covid19.

Figure 2.14. Active and bus transport linkages.



2.16 Equality and Diversity

Key Issues

2.16.1 The following key issues emerge from the context and baseline review:

- Policy reinforces the Borough's ambitions to ensure equality of access to a range of services as well as ensuring that local policy considers all groupings when it is developed.
- Literature asserts the importance of considering those who might be impacted disproportionately by decisions, or who may require additional support to access certain services. Core groups which may determine either factors include age (Figure 2.15), disability, race/ethnicity or religion/belief.
- Health limitations are generally higher in the urban areas of the borough, with the exception being in the rural north west of Telford and Wrekin (Figure 2.16).
- Compared to national and regional levels, Telford and Wrekin has low proportions of ethnic minorities (Figure 2.17) and minority religious groupings.

Scoping Decision

2.16.2 Considering the key issues discussed above, and the requirements of the EqIA it is proposed that the topic of Equality and Diversity should be **SCOPED IN** to the integrated Appraisal. The following objectives and supporting questions are proposed as part of the IIA Framework.

IIA objective	Assessment questions (will the option/ proposal help to...)
Tackle inequalities, ensure that decisions do not disproportionately affect minority populations and that services can be accessed equally by all.	<ul style="list-style-type: none"> • Enable people from all background to access services and facilities in a way that ensures equality? • Ensure that decisions do not disproportionately affect minority populations? • Ensure that areas and communities which require greater attention and need of services are accommodated? • Reduce the inequalities suffered by minority groups, including those with protected characteristics.

Figure 2.15: Spatial distribution of elderly population (aged 85+). Source: Census, 2021.

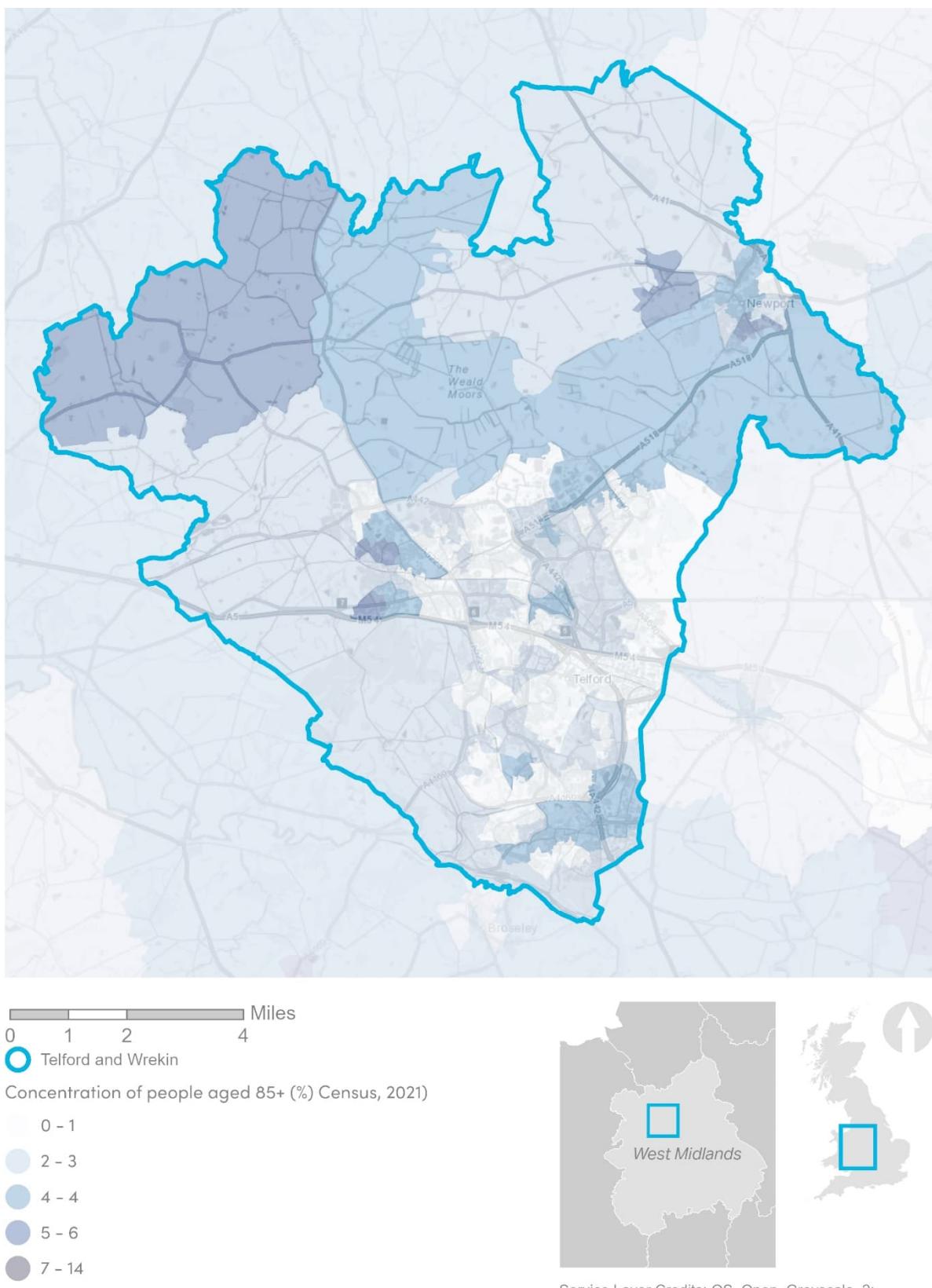


Figure 2.16: Map showing the distribution of area based rates of people identifying as being limited a lot due to disability or illness.

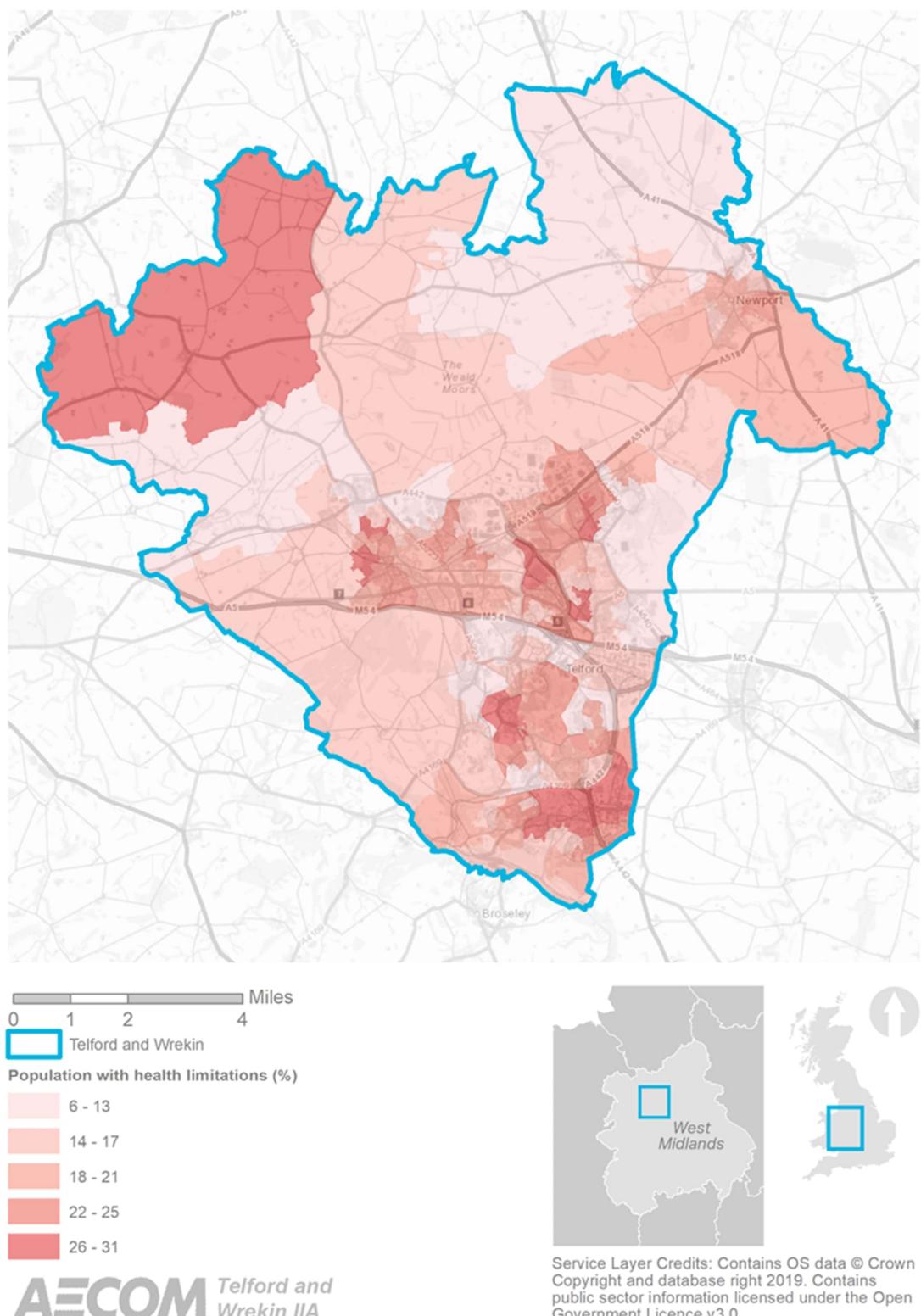
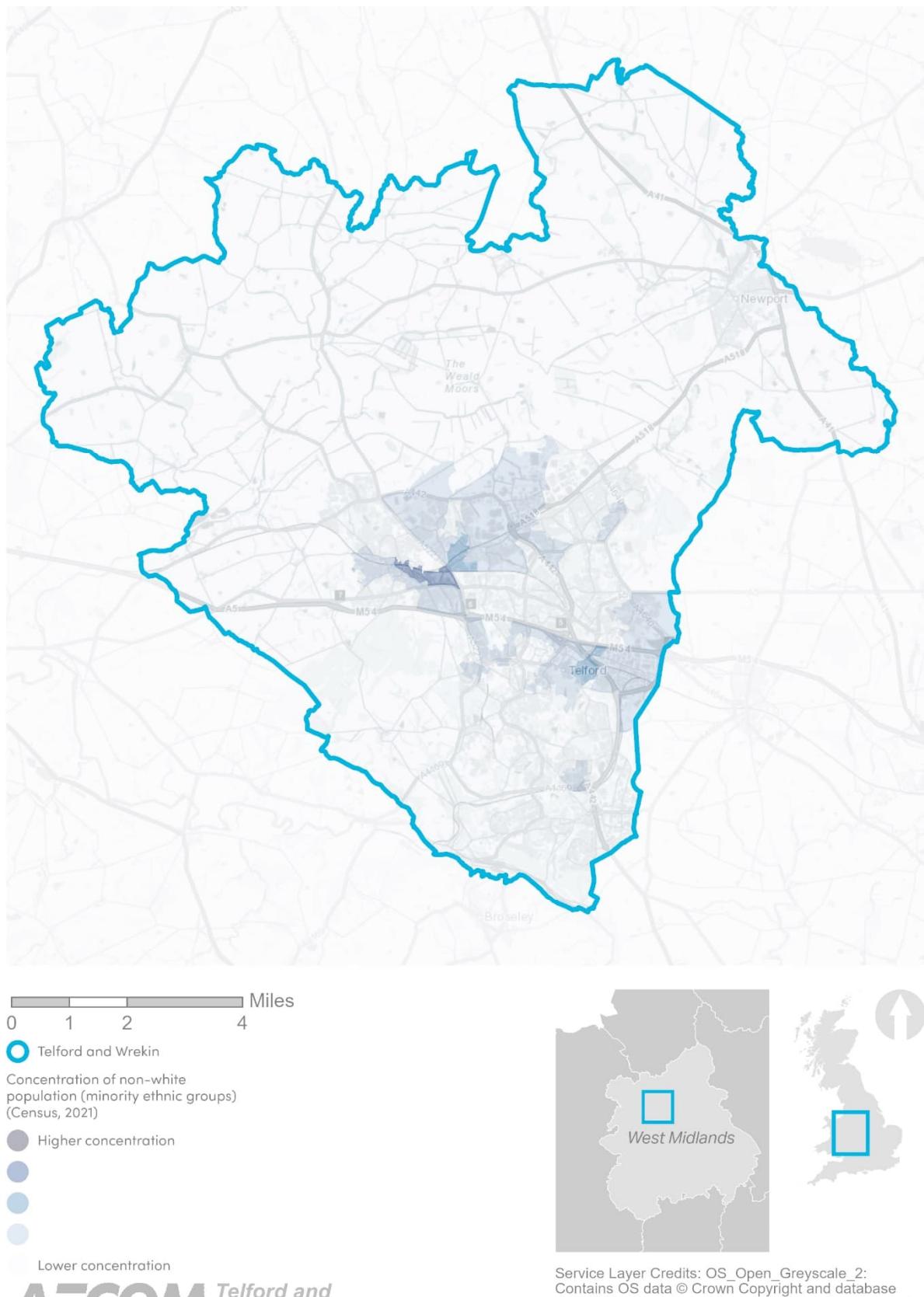


Figure 2.17: Map showing spatial distribution of BAME populations. Source: Census, 2021.



3. Appraisal Methods

3.1 The IIA Framework

3.1.1 The IIA Framework is summarised in Table 3.1 below and presented in full in Appendix I. The Framework comprises fourteen thematic objectives which are supported by a range of guiding assessment questions.

3.1.2 As discussed in the previous chapters of this report, the IIA Framework has been developed through a consideration of the policy context, focused literature review and baseline conditions in relation to each aspect of sustainability.

Table 3.1 Summary IIA Framework

IIA Theme	IIA Objectives
Biodiversity	<ul style="list-style-type: none"> Minimise, and avoid impacts upon biodiversity whilst achieving net gains through enhancement and creation of well-connected, functional habitats that are resilient to the effects of climate change.
Water Resources	<ul style="list-style-type: none"> Promote sustainable forms of development which minimise pressure on water resources, whilst maintaining and enhancing the quality of the Borough's rivers, lakes and aquifers.
Soil and Land	<ul style="list-style-type: none"> Promote the effective use of land and soil, ensuring that the best and most versatile agricultural land resources are protected and used effectively, whilst also preserving minerals resources.
Landscape	<ul style="list-style-type: none"> Protect and enhance the character of landscapes and townscapes; whilst ensuring their multifunctional use and enjoyment by all.
Historic Environment	<ul style="list-style-type: none"> Protect, maintain and enhance heritage assets (including their setting), cultural heritage and natural history.
Waste	<ul style="list-style-type: none"> Minimise waste generation and support the circular economy by implementing the waste hierarchy.
Climate Change Resilience	<ul style="list-style-type: none"> Adapt and become more resilient to the impacts of climate change, including directing growth away from areas of highest flood risk and preparing for more extreme weather events.
Climate Change Mitigation	<ul style="list-style-type: none"> Facilitate and contribute to the move towards a zero carbon Telford and Wrekin whilst improving social equity of access to energy.
Housing	<ul style="list-style-type: none"> Support timely delivery of an appropriate mix of housing types and tenures, including a focus on maximising the potential of brownfield opportunities, to ensure delivery of high quality housing that meets the needs of Telford and Wrekin residents.
Health and Wellbeing	<ul style="list-style-type: none"> Support healthy, safe lifestyles and environments for all community groups; whilst seeking to close 'inequality gaps' and improve resilience to health issues.
Economy and Infrastructure	<ul style="list-style-type: none"> Ensure that the local economy is equipped to support key local industries which bring tangible benefits to the lives of local residents whilst ensuring environmental degradation is minimised and social equity is achieved.
Transportation	<ul style="list-style-type: none"> Ensure that provision of transport infrastructure reflects local population and demographic needs, promotes sustainable modes of travel, connects new housing to employment, education, health and local services and maximises accessibility for all.
Equality and Diversity	<ul style="list-style-type: none"> Tackle inequalities, ensure that decisions do not disproportionately affect minority populations and that services can be accessed equally by all.

3.2 Determining significance

3.2.1 The appraisal will use the criteria in Schedule 1 of the SEA Regulations to guide decisions on the significance of effects. This includes:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (for example, due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to special natural characteristics or cultural heritage; exceeded environmental quality standards or limit values; or intensive land-use; and the effects on areas or landscapes which have a recognised national, community or international protection status.

3.2.2 In many instances it may not be possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

3.2.3 In determining whether effects are significant, the focus will be upon the differences that a policy approach will have when compared to the projected baseline position. Therefore, despite a plan measure being positive in its nature, it might not necessarily bring about a significant change compared to the measures that are already in place in the absence of the Plan. Likewise, the avoidance of negative effects might simply be a neutral effect if those effects would be unlikely to occur anyway.

3.2.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the Telford and Wrekin Local Plan Review.

3.2.5 The ability to predict effects accurately is also affected by the limitations of the baseline data. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure assumptions are explained in full. As such, all predictions will be transparent and justified using the available evidence.

3.3 Appraisal methods

Sources of information

3.3.1 The appraisal will draw upon a range of information sources to assist in the determination of the nature of impacts and their significance. This includes:

- The baseline information set out within this scoping report.
- Professional opinion and experience of the project team.
- Sources of GIS data gathered from opensource data and from Telford and Wrekin officers.
- Detailed technical studies for specific topics.

3.3.2 Additionally, the Council are preparing their own site selection methodology which, alongside the findings of the IIA, will inform which site options are proposed for allocation. The Council's draft site selection methodology was published for consultation alongside the Regulation 18 Issues and Options Consultation. The final version will be made available as part of the Regulation 18 Draft Plan consultation, though a high-level overview of each assessment stage is outlined below (Figure 3.1). There will be a need to ensure that the IIA process is integrated with the broader site selection process to avoid duplication and ensure all relevant factors are addressed.

Figure 3.1 Overview of proposed Telford and Wrekin Council site selection methodology**Stage 1 - Call for Sites and Strategic Housing & Economic Land Availability Assessment (SHELAA)**

- 1a) Firstly, from the Call for Sites, sites submitted from landowners & developers go forward for consideration in the SHELAA, then:
- 1b) From the SHELAA, all sites go forward for consideration at the next stage of the process, where sites not suitable, available or achievable sites will be discounted.

Stage 2 – Initial Assessment of Hard Constraints

Identify sites considered unsuitable due to site being wholly or significantly within hard constraints, i.e. where development on the remaining developable area would not be considered justifiable. Sites do not progress further.

Stage 3 – Local plan Review Growth Strategy

Sites will be screened against preferred Local Plan spatial strategy to ensure fit with strategic objectives. Housing and employment sites would not progress if they clearly do not fit with the preferred development strategy.

Stage 4 – Integrated Assessment

Sites progressing to this stage will be appraised against Sustainability Appraisal objectives. Significant positive or negative effects, as well as cumulative effects will be identified and scored via a RAG rating system. This stage would identify appropriate mitigation measures that would need to be addressed if site is subsequently progressed to the next stage.

Stage 5 – Flood Risk Sequential & Exceptions Test

Sites ranked from low-high on flood risk (sites identified as flood zone 3b will have been ruled out at Stage 2). Ranking based on findings from the Strategic Flood Risk Assessment (SFRA). More vulnerable sites (medium-high risk) requires pass of both parts of the Exception Test and site specific FRA as set out in the NPPF.

Stage 6 – Technical Assessment Stage

Sites will be assessed in detail in regards to soft constraints and the level of mitigation required. Sites will be assessed and informed by evidence from whole plan viability assessment.

Stage 7 – Overall Conclusions & Decisions on Site Allocations & Rejections

Sites at this stage of the process will either be justified as final site allocations, or rejected with clear reasoning for that decision. The Council may revisit sites from previous stages of the methodology if insufficient sites have been identified.

Working with Relevant stakeholders

3.3.3 An important part of the integrated appraisal process is to achieve effective engagement with relevant stakeholders. This allows for expert input, local knowledge and different perspectives to be factored into the process at key stages. Ultimately this leads to a more transparent and robust appraisal.

3.3.4 The following key stakeholders have been identified at this stage:

- Telford and Wrekin Council technical specialists, with liaison via the Planning Policy team;
- Natural England;
- Historic England;
- The Environment Agency;

3.3.5 It is also important to engage with the wider public and other interested parties such as those with an interest in land and development. Comments will be invited from a comprehensive range of stakeholders at subsequent stages of the IIA process (as determined by legislative requirements and best practice).

Assumptions

3.3.6 It is important to set out the assumptions related to an impact assessment. This makes it clear what the focus of the assessment is, and what factors are not being considered (or cannot be considered). This is particularly relevant given the strategic nature of the Plan.

3.3.7 **This is a strategic plan** - The appraisal is focused upon strategic issues, and therefore, information gathered to support the appraisals (i.e. scoping) should not cover issues and information that are not being dealt with at this scale of plan-making.

3.3.8 **The precautionary principle** - Even where there are constraints to development, it is possible (with good layout, design and scheme details) to avoid negative effects or even achieve a positive outcome. However, this level of detail is not available at a strategic level, so impact assessments need to take account of the 'unmitigated' situation. Therefore, when determining impacts at a strategic level, a precautionary approach is taken.

3.3.9 **Mitigation and enhancement** - Any recommendations that are made will need to be appropriate to the scope of the Plan and the factors that it deals with and influences. In this instance, the Plan will not deal with site specific or development management issues. Therefore, such measures will not be appropriate with regards to mitigation and enhancement.

3.3.10 **Uncertainty** - Given the high level nature of the plans (and appraisal), there are always going to be elements of uncertainty relating to the nature and extent of impacts. Where such uncertainties exist, they will be made clear in the assessments. To ensure that appraisals are robust and uncertainties are limited, predictions will be made in relation to the established baseline position and supported by evidence.

3.3.11 **Project level detail** - There is an assumption that project level assessments which involve Environmental Impact Assessment (EIA) will deal with specific on-site issues.

4. Consideration of reasonable alternatives

4.1 Screening

4.1.1 Consideration of alternatives is an important part of the sustainability appraisal process. However, there needs to be a proportionate and sensible approach to alternatives.

4.1.2 It is important to focus on the issues that are central to the Plan, rather than appraising alternatives for each and every element of a Plan. Therefore, whilst there were many 'options / proposals' set out in the issues and options consultations document, these are not all considered to be reasonable alternatives in the context of the SA. **Table 4.1** below 'screens' the options/proposals within the issues and options paper, concluding on whether there is a need for exploration of alternatives within the integrated appraisal (it is important to remember that the Plan will be appraised 'as a whole' and this will address the policy approaches that are decided upon).

Table 4.1: 'Screening' issues and options

Issue / Option	Relevance to the Integrated Appraisal
Vision for defining a 'Forest Community' Two alternative visions proposed	The visions are both very similar in their content and are high-level. Appraisal would not be meaningful.
Employment land requirement Two employment land requirement options identified (167ha and 189ha)	This is a strategic issue, which is taken forward for consideration in the appraisal (see section 6).
Housing need requirements Three growth scenarios were put forward for consideration.	This is a strategic issue, which is taken forward for consideration in the appraisal (see section 5)
Distribution of growth Four options identified: <ul style="list-style-type: none"> • Maintain current strategy • Rural focus • Newport focus • Newport and Rural focus 	This is a strategic issue, which is taken forward for consideration in the appraisal (see section 5)

Issue / Option	Relevance to the Integrated Appraisal
Distribution considerations for rural areas <ul style="list-style-type: none"> • Allocate new sites • Brownfield opportunities • New settlements • Windfall / infill continuation 	These factors are encapsulated within the reasonable alternatives explored for housing growth and distribution. For example, it is presumed that growth in rural areas will make use of brownfield opportunities and infill, before consideration of new site allocations where the housing requirement is higher.
Policy EC1 Strategic Employment Areas Two options as to how employment areas and allocations should be addressed in terms of suitable uses	These are procedural options that do not need to be appraised in the IIA.
EC5 Telford Town Centre A series of proposals are listed in relation to the changing role of town centres and to support the ambitions and success of Telford.	The proposals / options are not mutually exclusive, rather they are a 'menu' of approaches that may all have some relevance in terms of a suitable approach for town centres. Appraisal in the IIA not necessary.
EC6 Market Towns and District Centres A series of proposals are listed in relation to the need for flexibility to aid the role of centres, whilst guarding against a predominance of uses.	The proposals / options are not mutually exclusive, rather they are a 'menu' of approaches that may all have some relevance in terms of a suitable approach for town centres. Appraisal in the IIA not necessary.
HO2 Housing Allocations Sets out a range of proposals with regards to principles for housing development on allocated sites.	These are procedural options that do not need to be appraised in the IIA.
HO4 Housing Mix and Quality in Telford Sets out a range of proposals with regards to types and standards.	These are procedural options / a 'menu' of policy approaches that are not mutually exclusive. Therefore, appraisal through the IIA is unnecessary.

Issue / Option	Relevance to the Integrated Appraisal
HO5 Affordable Housing Thresholds and Percentages <p>Three options as to how affordable housing requirements could be applied.</p>	These are procedural 'options' that do not need to be appraised in the IIA.
HO6 Delivery of Affordable Housing <p>Two proposals relating to the mechanism of delivering affordable housing.</p>	These are procedural 'options' that do not need to be appraised in the IIA.
HO7 Specialist and Supported Housing <p>Four proposals relating to the policy approach for delivering specialist housing.</p>	These are procedural 'options' that do not need to be appraised in the IIA.
HO10 Residential Development in the Rural Areas <p>Sets out a list of 5 proposals for dealing with housing growth in the rural areas.</p>	The proposals are not a mutually exclusive list of options, and are also encapsulated within consideration of the spatial strategy / site selection process. Therefore, these specific options do not require explicit appraisal in the IIA.
HO11 Affordable Rural Exceptions <p>3 policy approaches for delivering rural exception sites</p>	These are procedural 'options' that do not need to be appraised in the IIA.
New Town Estates <p>Sets out a list of 8 proposals which could form part of a framework for supporting housing renewal.</p>	These are procedural options / a 'menu' of policy approaches that are not mutually exclusive. Therefore, appraisal through the IIA is unnecessary.
Self Build and Custom Built Housing <p>Two proposals on how to support self build and custom built housing.</p>	These are procedural 'options' that do not need to be appraised in the IIA.

Issue / Option	Relevance to the Integrated Appraisal
NE1 Biodiversity and Geodiversity A list of proposals is provided to help update the policy approach	The proposals are a 'menu' of policy approaches that are not mutually exclusive. Therefore, appraisal of alternatives through the IIA is unnecessary.
NE2 Trees, Hedgerows and Woodlands A list of proposals is provided to reflect the Council's ambition to become a forest community.	The proposals are a 'menu' of policy approaches that are not mutually exclusive. Therefore, appraisal of alternatives through the IIA is unnecessary.
NE3 Existing Public Open Space Two proposals to clarify the policy approach.	These are procedural 'options/proposals' that do not need to be appraised in the IIA.
NE4 Provision of Public Open Space A series of proposals put forward to provide triggers for open space provision.	These are procedural 'options/proposals' that do not need to be appraised in the IIA.
NE5 Management and Maintenance of Public Open Space Three proposals put forward to clarify expectations relating to open space provision.	These are procedural 'options/proposals' that do not need to be appraised in the IIA.
Biodiversity Net Gain Four proposals put forward for managing the delivery of biodiversity net gain.	The proposals are a 'menu' of policy approaches that are not mutually exclusive. Therefore, appraisal of alternatives through the IIA is unnecessary.
Urban Greening A series of proposals put forward to guide the approach to urban greening.	These are procedural 'options/proposals' that do not need to be appraised in the IIA.
COM1 Community Facilities Proposals put forward to update policies relating to the provision and loss of community facilities.	These are procedural 'options/proposals' that do not need to be appraised in the IIA.

Issue / Option	Relevance to the Integrated Appraisal
C1 Promoting alternatives to the Car <p>Several proposals put forward to strengthen the level of support for sustainable travel.</p>	<p>These are procedural 'options/proposals' that do not need to be appraised in the IIA.</p>
C4 Design of Roads and Streets <p>Proposals for strengthening the role of the policy regarding climate change.</p>	<p>These are procedural 'options/proposals' that do not need to be appraised in the IIA.</p>
C5 Design of Parking <p>Proposals for updating the role of the policy regarding carbon neutrality.</p>	<p>These are procedural 'options/proposals' that do not need to be appraised in the IIA.</p>
C7 Enhancing communications network <p>Proposals for updating the role of the policy.</p>	<p>These are procedural 'options/proposals' that do not need to be appraised in the IIA.</p>
BE1 Design Criteria <p>Proposals put forward for strengthening the approach to good design.</p>	<p>These are procedural 'options/proposals' that do not need to be appraised in the IIA.</p>
BE2 Residential alterations <p>Proposals put forward for strengthening the approach.</p>	<p>These are procedural 'options/proposals' that do not need to be appraised in the IIA.</p>
BE3 Ironbridge Gorge World Heritage Site <p>Proposals to expand the policy.</p>	<p>These are procedural 'options/proposals' that do not need to be appraised in the IIA.</p>
BE4-BE6 <p>Proposals relating to heritage</p>	<p>These are procedural 'options/proposals' that do not need to be appraised in the IIA.</p>
BE9 Land Stability B10 Land Contamination <p>Proposals put forward for clarifying requirements.</p>	<p>These are procedural 'options/proposals' that do not need to be appraised in the IIA.</p>

Issue / Option	Relevance to the Integrated Appraisal
Private Amenity Space <p>Several proposals introduced to ensure adequate space is provided in new development.</p>	<p>These are procedural ‘options/proposals’ that do not need to be appraised in the IIA.</p>
ER1 Renewable Energy <p>Five proposals put forward for strengthening support for renewable energy development.</p>	<p>These are procedural options / a ‘menu’ of policy approaches that are not mutually exclusive. Therefore, appraisal through the IIA is unnecessary.</p>
ER10 Water Conservation and Efficiency <p>Proposals put forward for strengthening the policy approach.</p>	<p>These are procedural ‘options/proposals’ that do not need to be appraised in the IIA.</p>

4.2 Areas of focus

4.2.1 Building on the screening exercise (undertaken at issues and options stage) described above, the key issues identified for further consideration in the Integrated Appraisal are listed below.

- A strategy for housing growth and distribution
- A strategy for employment growth and distribution
- Appraisal of broad areas of growth
- Individual site appraisals

4.2.2 Each of these bullet points is addressed in a chapter of its own in the following sections.

4.2.3 Following issues and options stage, the Council made some changes to policies, notably the inclusion of a separate climate change section including new policies. Similar to the screening process described above, the Council considered whether there were reasonable alternatives in relation to these new policies, concluding that there were none.

5. Strategic housing options

5.1 Housing growth

5.1.1 The starting point for identifying an appropriate housing target is the consideration of housing need. The Council commissioned an Employment and Housing Needs Assessment (EHDNA). The EHDNA suggested three options for growth these were 848, 964 and 1,150 homes per annum.

5.1.2 Prior to establishing a preferred approach, the council considered that there were three reasonable alternative options in terms of housing growth (Table 5.1), and these have been explored further in the integrated appraisal.

Table 5.1 Growth scenarios

Growth Scenario	Why is this reasonable?
EDNA employment led scenario. 848 dpa	This figure corresponds closely with the continuation of existing Local Plan growth (864 dpa).
Re-based housing projections 1,010 dpa	At the issues and options stage, there was broad support for a population-led figure of 964 dpa (this figure was subject to an uplift of 13 units to fully account for older peoples housing).
High economic performance 1,150 dpa	The high performance represents the best performance of the housing market over the five years (2014-19). This is reflective of what the borough could deliver with the right mix of infrastructure investment, availability of land and proactive support for growth.

5.1.3 It is not necessary to appraise every option conceivable, and it is within the remit of the Plan-maker to determine what is reasonable. Therefore, whilst other alternatives have been considered by the Council, they have been deemed to be unreasonable for the purposes of IIA. The following options were discussed, but ultimately not taken forward for further consideration in the integrated appraisal.

Plan for a higher level of growth than the 'High Economic Performance Scenario'

5.1.4 The Council consider that the housing growth experienced in recent years has reached its peak and the plan should anticipate this. Delivery has started to flatten out and it is unreasonable to assume that high deliver rates over the past averages of around 1,000 units per annum can be sustained over a 20 year plan period. Too much growth would impact on infrastructure and services and put the Council under pressure to find sites that are not necessarily desirable or sustainable and could impact the delivery of the plan.

Plan for the objectively assessed housing need minimum of 500 homes per year

5.1.5 The Council consider that it is not a defendable position to rely on this figure. Based on the area's past delivery and economic priorities it is highly unlikely this position would be accepted by a Government Planning Inspector (nor would it meet the objectives of the Plan relating to economic growth). The Government is clear that the standard method calculation is the starting point (not the end point) for planning for growth.

5.2 Distribution

5.2.1 There are many different ways in which housing can be delivered, so it is the Council's responsibility to identify a manageable set of reasonable alternatives. When identifying alternatives, it is important that they are sufficiently distinctive to allow for a meaningful appraisal. They also need to be realistic, deliverable and meet the objectives of the Plan. In addition, the following factors have been used to help identify alternatives with regards to distribution:

- *Land supply, identified through a call for sites exercise* - there needs to be a realistic prospect of land being available for development or strategies relying on potential supply could be found unsound.
- *Settlement hierarchy* – It is reasonable to direct growth to locations that are already well served by infrastructure and services (or to locations that can be made sustainable with sufficient growth).
- *National Planning Policy Framework* – Where possible a sequential approach should be taken to avoid significant constraints such as flood risk and designated habitats.

5.2.2 The current strategy set out within the Telford and Wrekin Local Plan is based upon the 2011 census population split. This reflects the size and scale of growth in these settlements and areas. It also recognises the role of Telford as the focus for employment and housing growth due to the level and scale of infrastructure in the area and opportunities for inward investment.

5.2.3 The proposed extension of the plan period to 2040 makes it appropriate for the Council to identify alternative distribution strategies going forward. Given that the current Local Plan has provided a balanced strategy for growth in the borough, it is considered reasonable that such an approach could be extrapolated forwards as one alternative.

5.2.4 Under any approach, it is likely that Telford will receive a large proportion of growth, as there is already substantial committed development, and scope for further development. However, it is reasonable to explore whether a greater amount of residual growth could be directed to other locations in the Borough (particularly Newport and the 'Rural Areas').

5.2.5 Table 5.2 details the distribution options and relevant splits of housing to Telford, Newport and Rural Areas.

Increased growth in Rural Areas

5.2.6 This option would still recognise the role of Telford as the focus for the majority of growth, however it helps to ease the pressure for growth within Telford by dispersing more development in the rural area.

5.2.7 The additional growth could be accommodated via a broader strategy for the rural area which could include the identification of more key settlements to receive infill development, brownfield site allocations and where higher levels of supply are required allocating development sites in villages to a completely new rural settlement.

5.2.8 A key feature of this approach is that increased rural housing growth would allow for more affordable provision in villages and help to reduce the age profile of rural communities.

Increased growth in Newport

5.2.9 This option still recognises the role of Telford as the focus for the majority of growth, however it helps to ease the pressure for growth within Telford by dispersing more development in and around Newport (which is the second largest urban area in the Borough).

5.2.10 It is assumed that not all development needs could be met within the existing urban boundary of Newport and this would need to be extended

5.2.11 Growth would likely be met through a mix of site allocations and inner urban windfall development

5.2.12 Similar to Telford there will need to be a balance of development that helps to protect green spaces within the existing boundary of Newport.

5.2.13 Growth of Newport should not lead to coalescence with surrounding villages and towns such as Chetwynd Aston, Edgmond and Lilleshall. .

Newport and Rural Areas

5.2.14 Given that it is considered reasonable to direct a proportion of growth away from Telford to Newport or the Rural Areas, it is sensible that a fourth alternative should be tested that directs further growth from Telford, but seeks to boost growth in both the Rural Areas and Newport (rather than one or the other).

Table 5.2 Housing distribution options

Distribution options	Telford	Newport	Rural Area
Maintain current strategy	86%	8%	6%
Increased growth in Rural Areas	78%	8%	14%
Increased growth in Newport	78%	14%	8%
Increased growth in Newport and Rural Areas	75%	12.5%	12.5%

Other options considered

- 5.2.15 The Council considered the possibility of establishing a new standalone settlement, which could be self-sufficient in terms of the creation of new facilities, transport infrastructure and utilities. The scale of growth required to support such a settlement would necessitate a significant amount of land to be brought forward in a suitable location.
- 5.2.16 No such areas have been identified by the Council, or proposed by stakeholders, and therefore this is considered to be an unreasonable alternative.

5.3 Reasonable alternatives

- 5.3.1 It is difficult to predict the effects of growth scenarios without having an understanding of where development would be located. Likewise, the same distribution options could lead to different effects at different scales of housing growth. Therefore, it is considered beneficial to consider housing growth and distribution alongside one another, as both influence the likely effects.
- 5.3.2 The housing distribution and growth options have been combined; resulting in 12 reasonable alternatives for the housing strategy.
- 5.3.3 These are outlined in table 5.3 below and broken down into detailed figures in table 5.4.

Table 5.3 Reasonable alternatives for housing strategy

	Scenario 1	Scenario 2	Scenario 3
Telford focus	1.1	2.1	3.1
Rural focus	1.2	2.2	3.2
Newport focus	1.3	2.3	3.3
Rural and Newport	1.4	2.4	3.4

- 5.3.4 For each option, several assumptions are made.

- Committed growth (current permissions) is presumed to form a part of the 'baseline position' (i.e. likely to come forward regardless of the Plan review). Therefore, the focus of the appraisal will be on additional / residual growth (though account will be taken of the impact this growth will have alongside committed growth).
- Where available, suitable brownfield land in the urban areas will be a 'constant' element of each option, and would be expected to come forward before consideration of greenfield sites. This is more relevant where growth in settlements is anticipated to be low.
- Additional growth is presumed to be possible on proposed sites for housing (submitted through the call for sites). Where the level of growth is higher, there is an assumption that there will be less flexibility in site selection as more of the sites would be needed to meet the housing target. Conversely, where growth allows for choice, the effects will be somewhat uncertain.
- The options assume a 20% supply buffer will be applied to allow for flexibility in achieving the housing target for that growth scenario.

Table 5.4 Detailed breakdown of housing supply for each reasonable alternative

Growth Scenario 1: 16,960 dwellings (848 dpa)

Distribution	Including supply			Excluding supply (i.e. new allocations)			Total Residual
	Telford	Newport	Rural area	Telford	Newport	Rural area	
Option 1. Maintain current strategy	14,586	1,357	1,018	5,134	257	190	5,582
Option 2. Rural growth	13,229	1,357	2,374	3,777	257	1,547	5,582
Option 3. Newport growth	13,229	2,374	1,357	3,777	1,275	529	5,582
Option 4. Rural and Newport Growth	12,720	2,120	2,120	3,269	1,021	1,293	5,582

Growth Scenario 2: 20,200 (1010 dpa)

Distribution	Including supply			Excluding supply (i.e. new allocations)			Total Residual
	Telford	Newport	Rural area	Telford	Newport	Rural area	
Option 1. Maintain current strategy	17,372	1,616	1,212	7,921	517	385	8,822
Option 2. Rural growth	15,756	1,616	2,828	6,305	517	2,001	8,822
Option 3. Newport growth	16,756	2,828	1,616	6,305	1,729	789	8,822
Option 4. Rural and Newport Growth	15,150	2,525	2,525	5,699	1,426	1,698	8,822

Growth Scenario 3: 23,000 (1150 dpa)

Distribution	Including supply			Excluding supply (i.e. new allocations)			Total Residual
	Telford	Newport	Rural area	Telford	Newport	Rural area	
Option 1. Maintain current strategy	19,780	1,840	1,380	10,329	741	553	11,622
Option 2. Rural growth	17,940	1,840	3,220	8,489	741	2,393	11,622
Option 3. Newport growth	17,940	3,220	1,840	8,489	2,121	1,013	11,622
Option 4. Rural and Newport Growth	17,250	2,875	2,875	7,799	1,776	2,048	11,622

Figure 5.1: Conceptual map for Alternative 1.1

Growth Scenario 1: Option 1

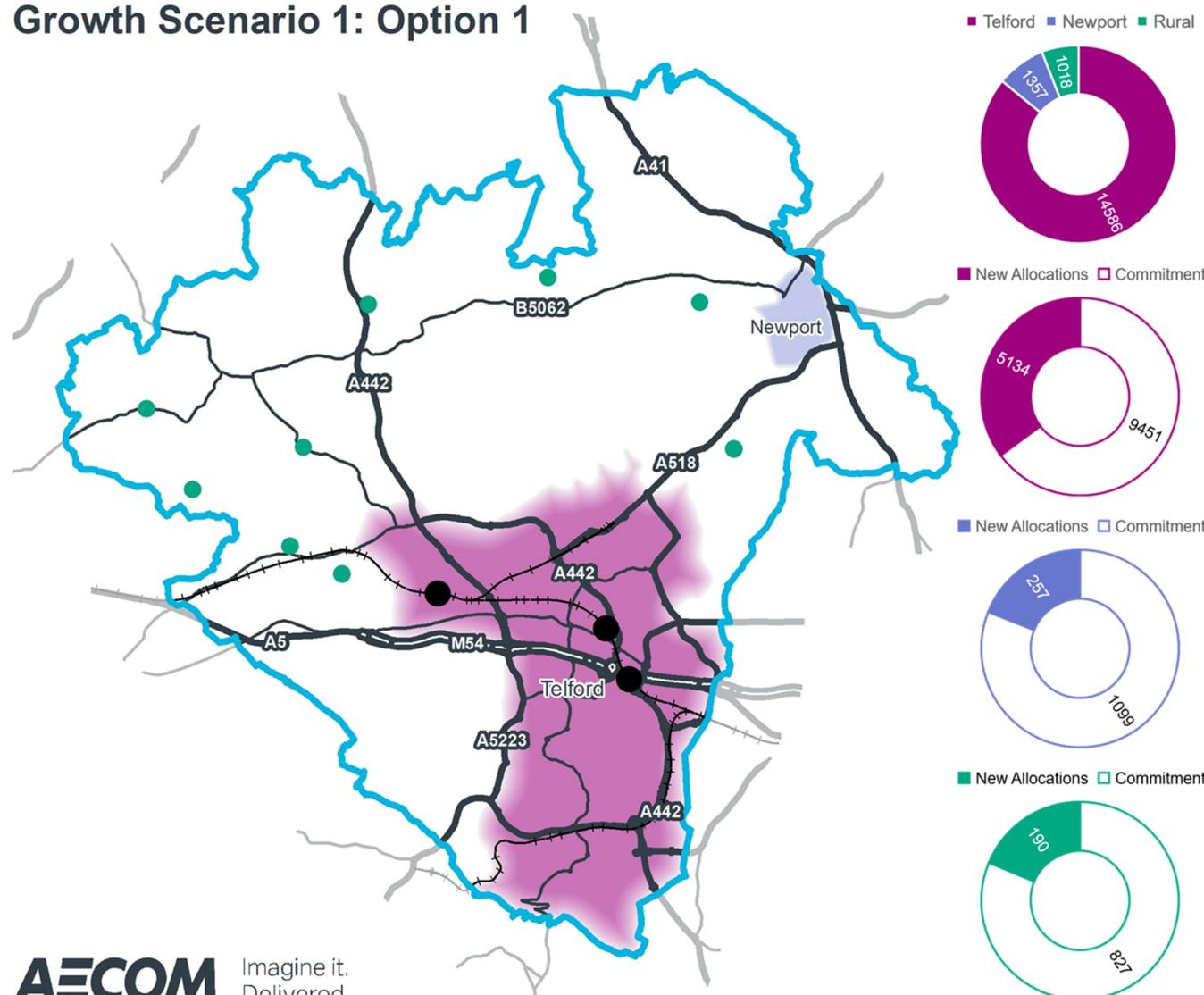


Figure 5.2: Conceptual map for Alternative 1.2

Growth Scenario 1: Option 2

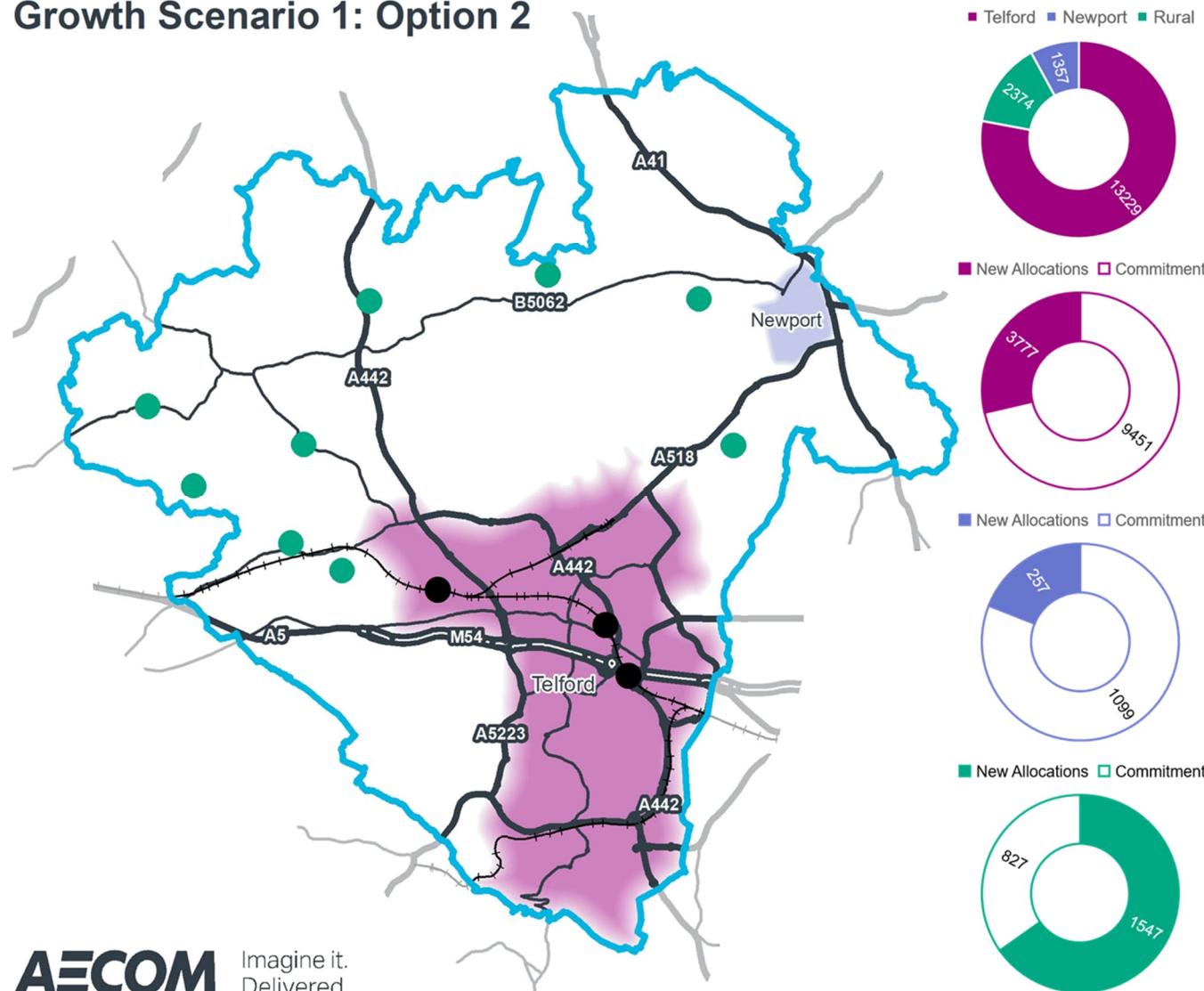


Figure 5.3: Conceptual map for Alternative 1.3

Growth Scenario 1: Option 3

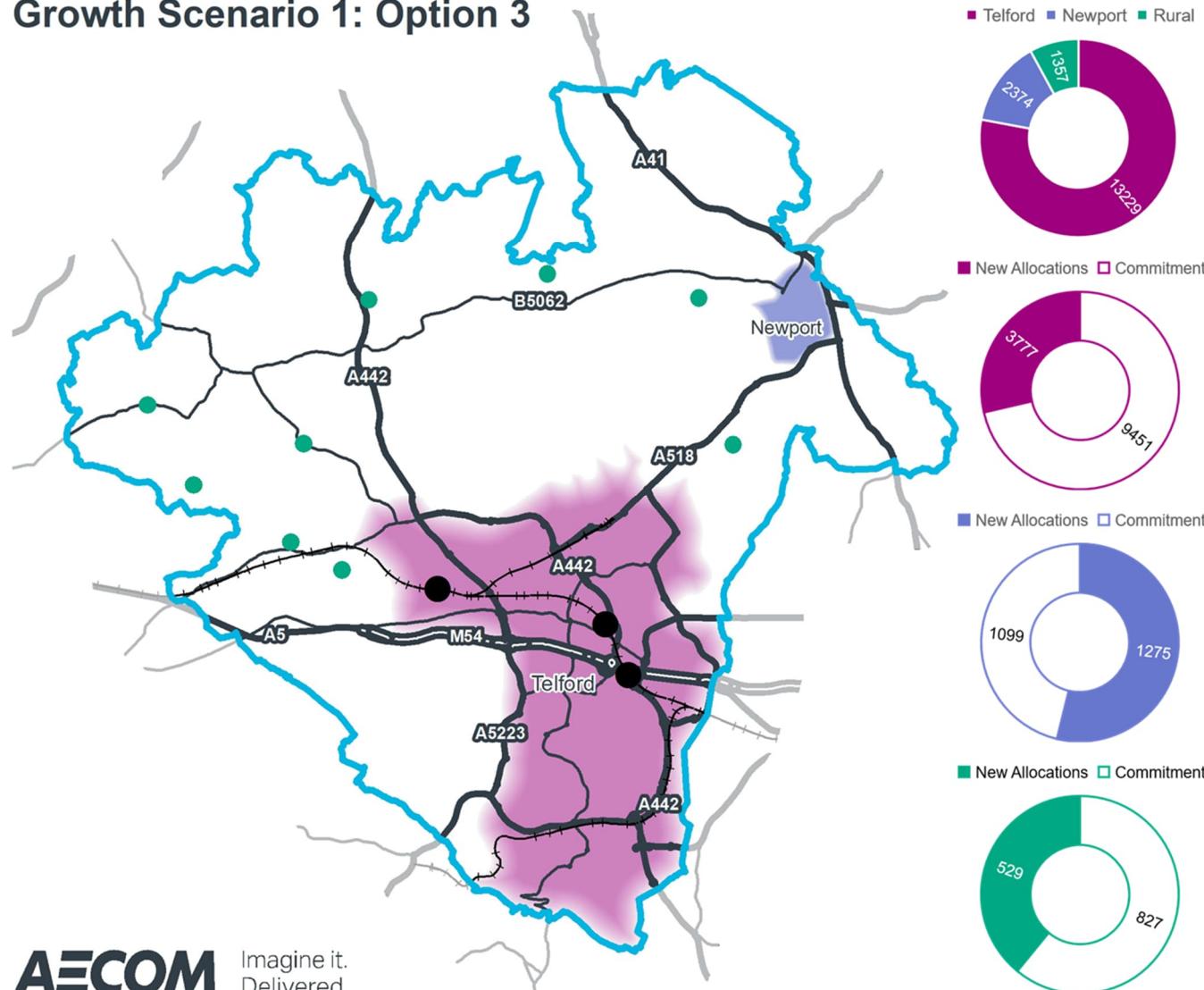


Figure 5.4: Conceptual map for alternative 1.4

Growth Scenario 1: Option 4

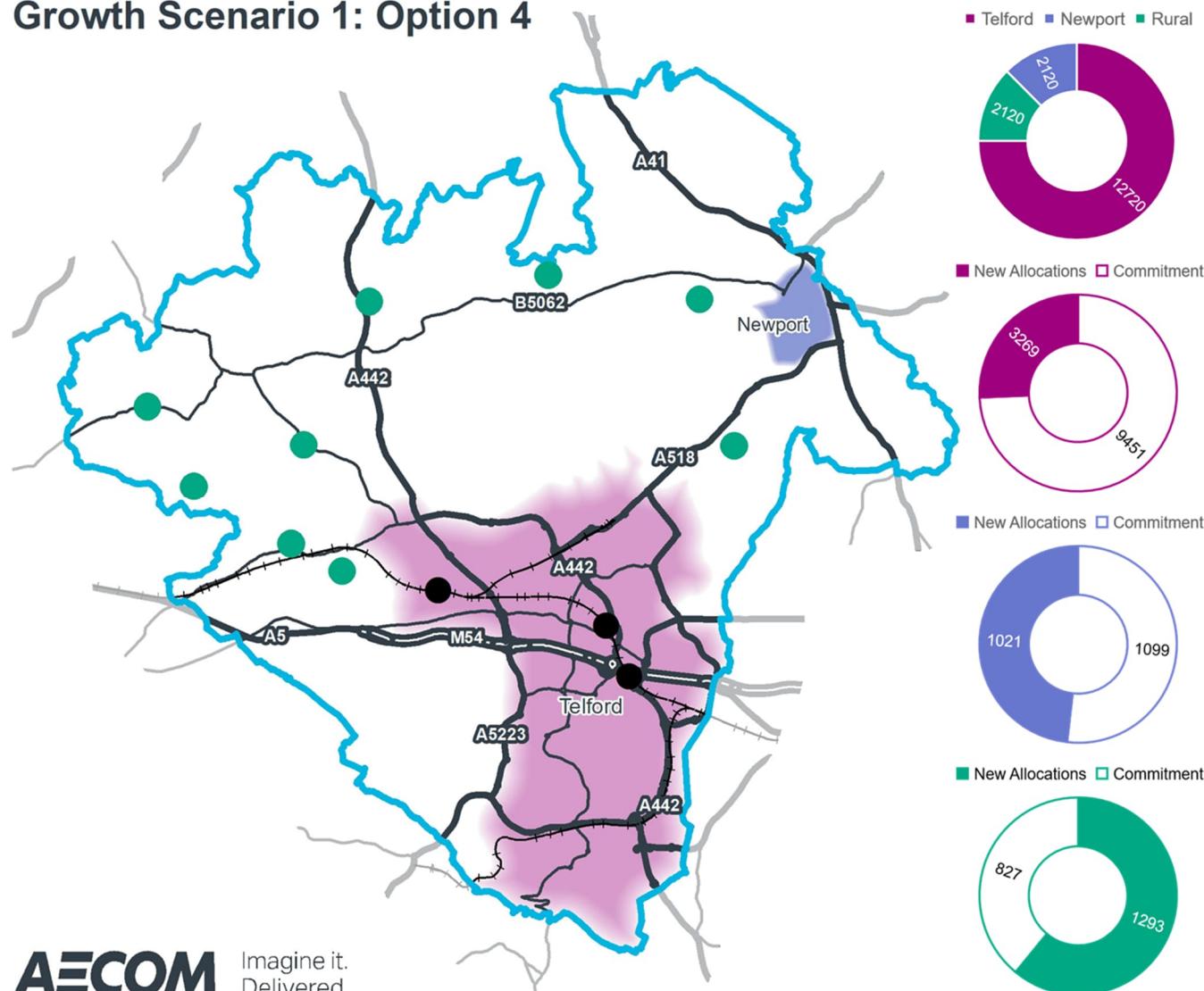


Figure 5.5: Conceptual map for Alternative 2.1

Growth Scenario 2: Option 1

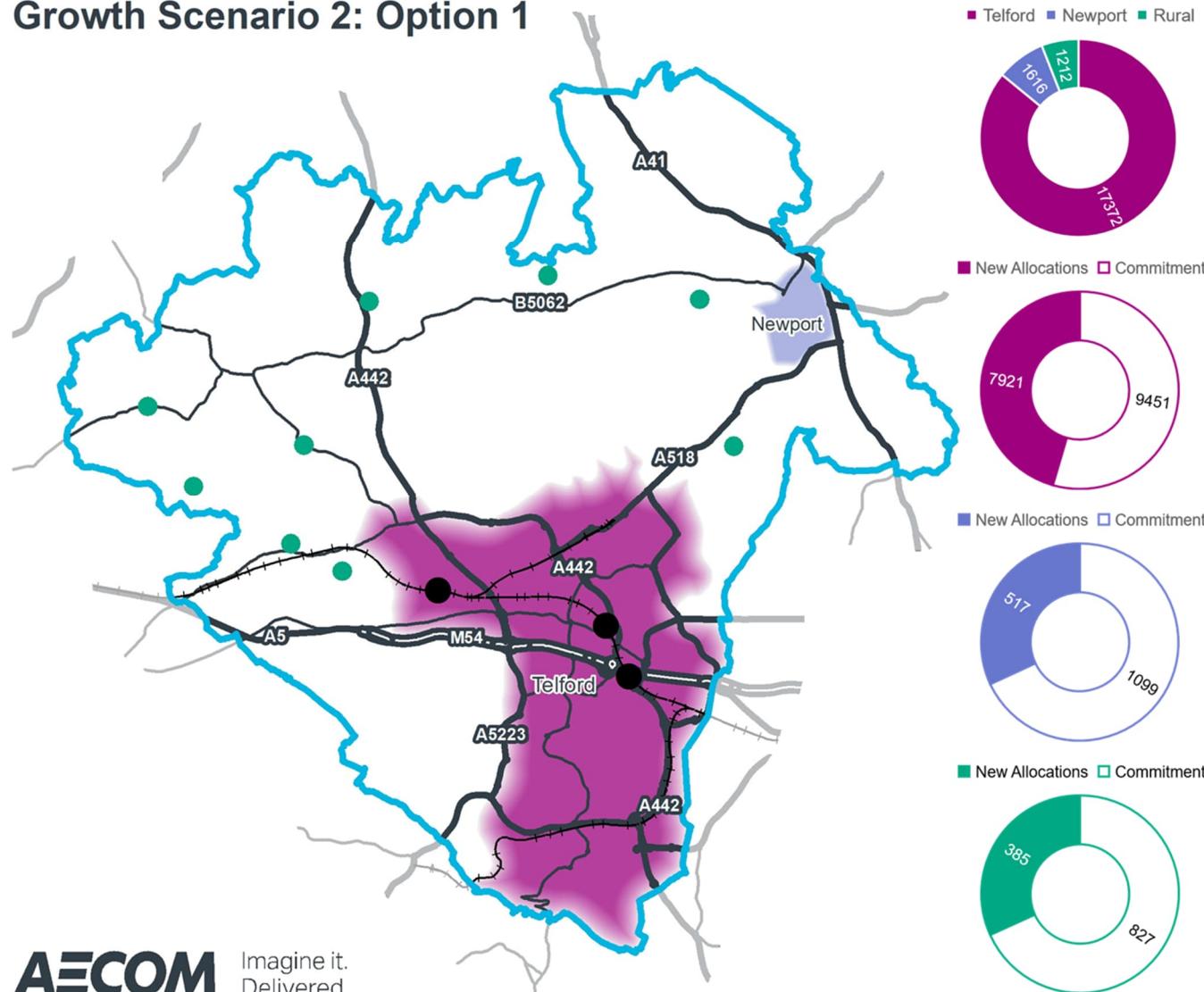


Figure 5.6: Conceptual map for Alternative 2.2

Growth Scenario 2: Option 2

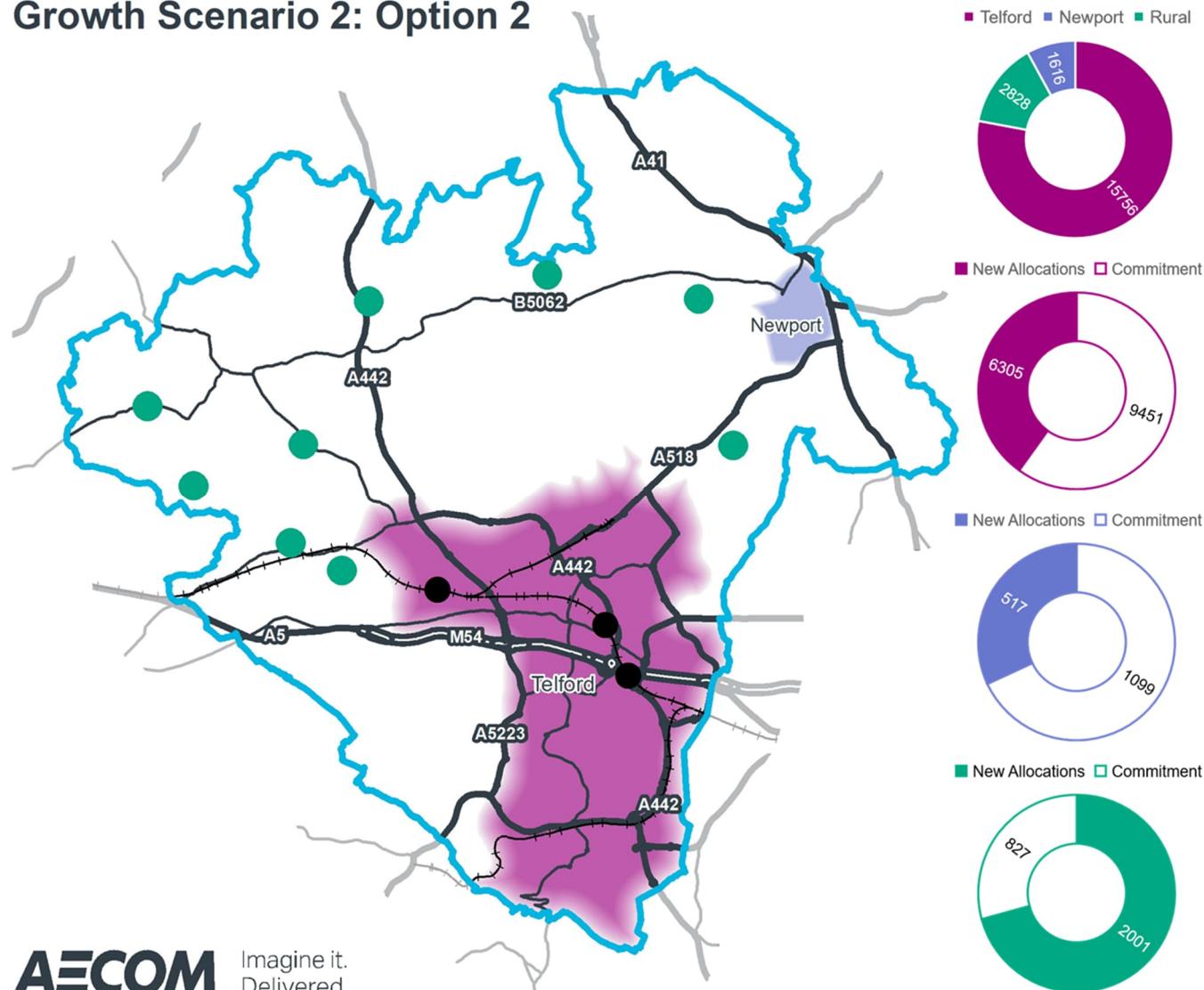


Figure 5.7: Conceptual map for Alternative 2.3

Growth Scenario 2: Option 3

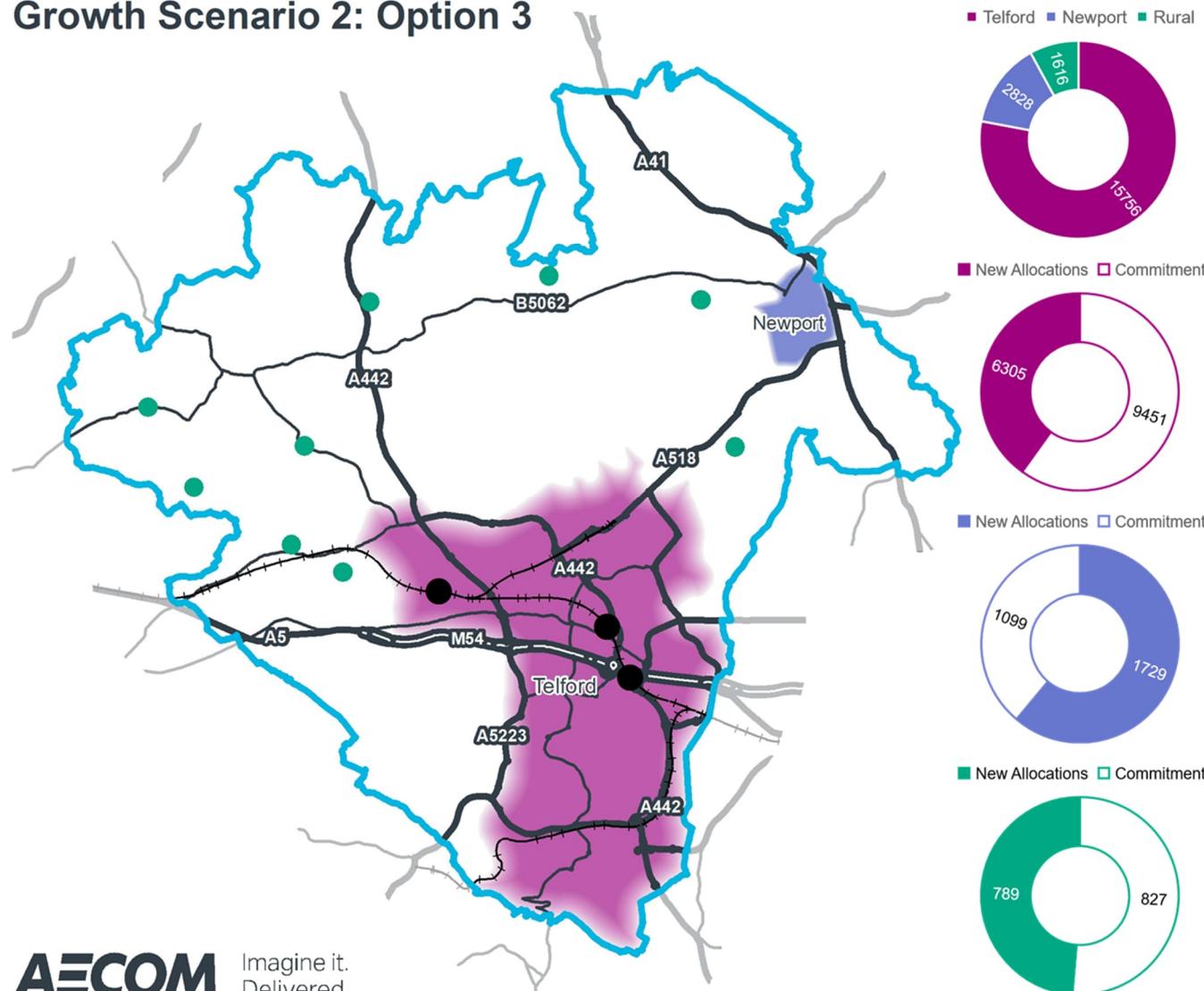


Figure 5.8: Conceptual map for Alternative 2.4

Growth Scenario 2: Option 4

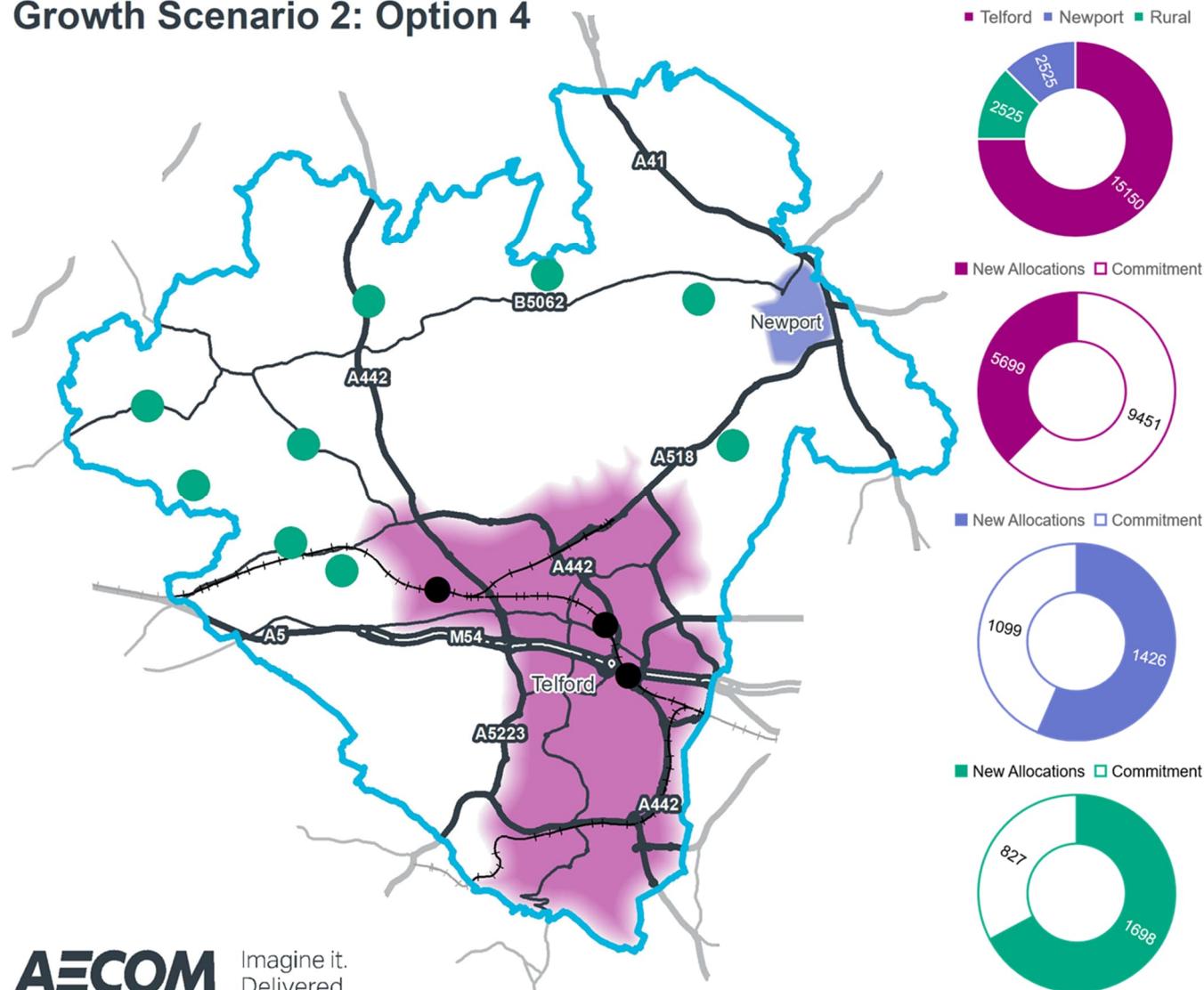


Figure 5.9: Conceptual map for Alternative 3.1

Growth Scenario 3: Option 1

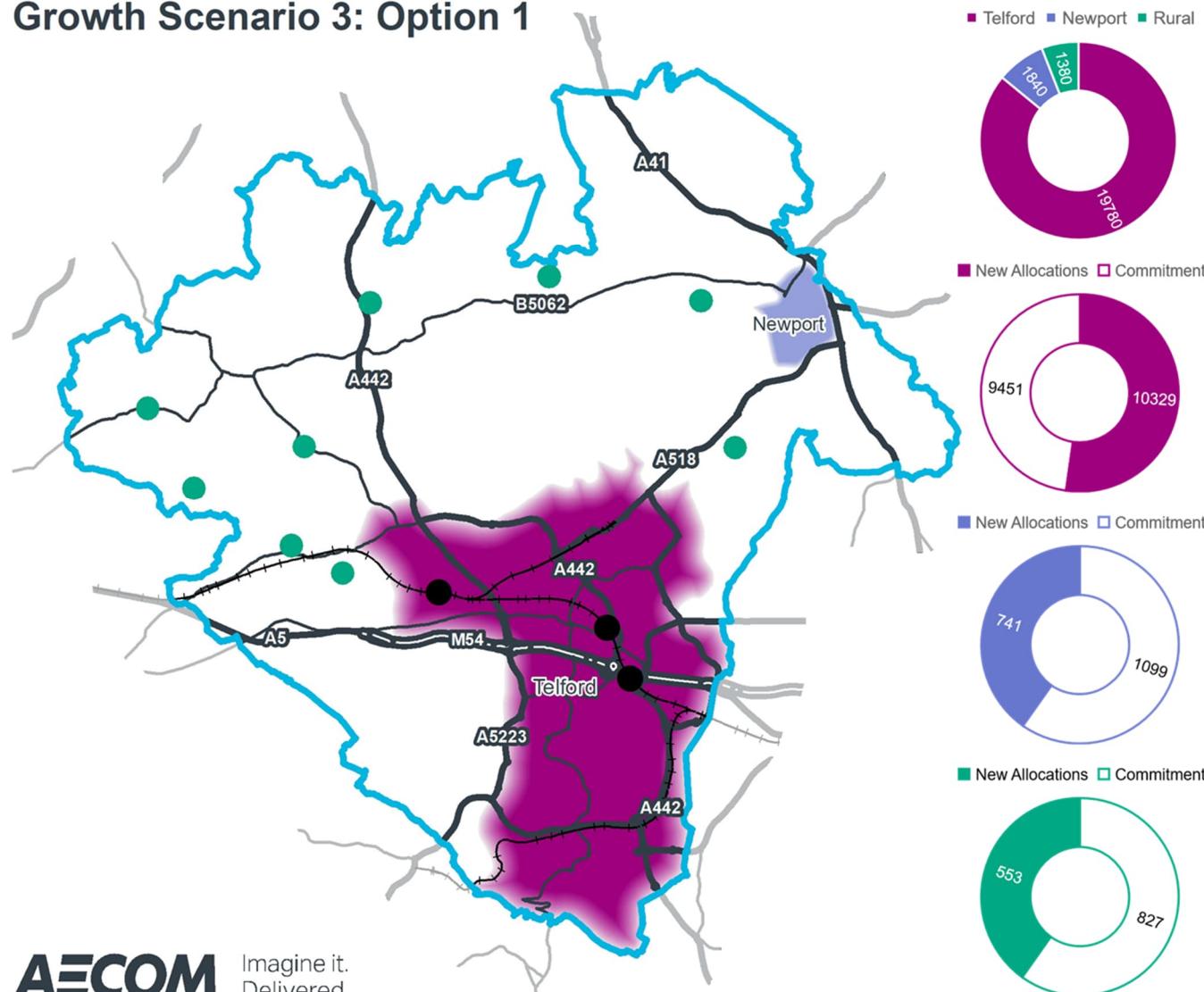


Figure 5.10: Conceptual map for Alternative 3.2

Growth Scenario 3: Option 2

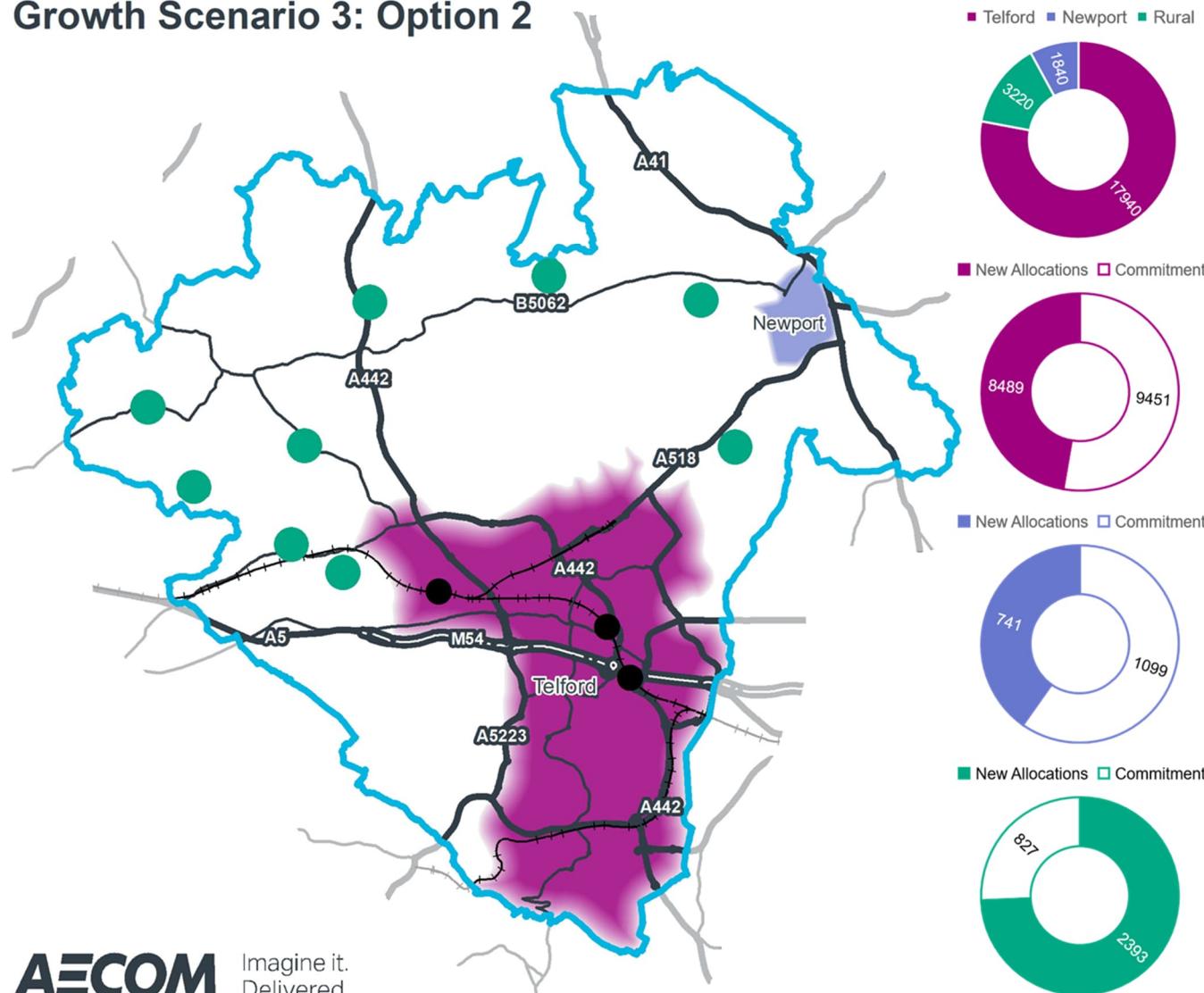


Figure 5.11: Conceptual map for Alternative 3.3

Growth Scenario 3: Option 3

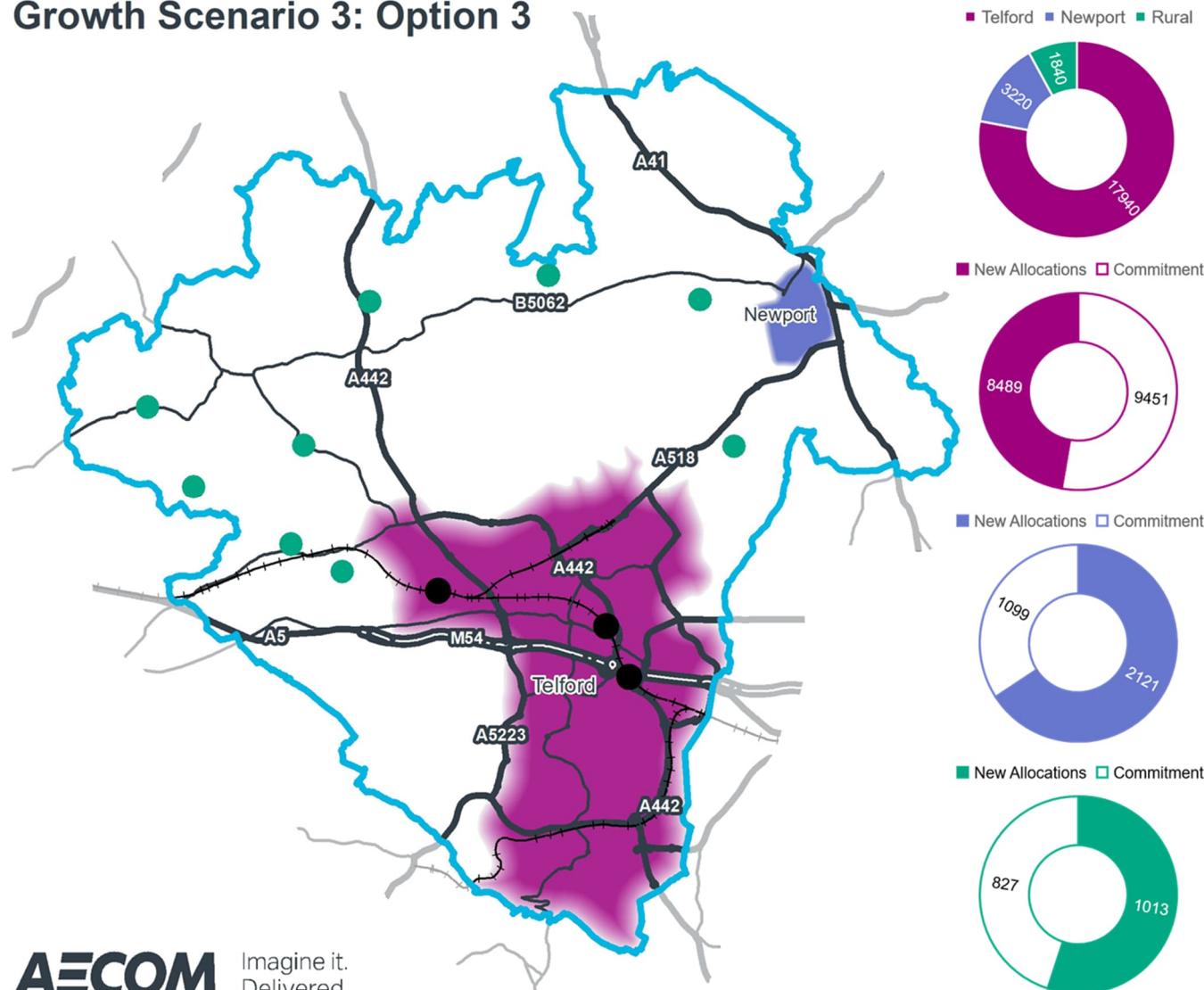
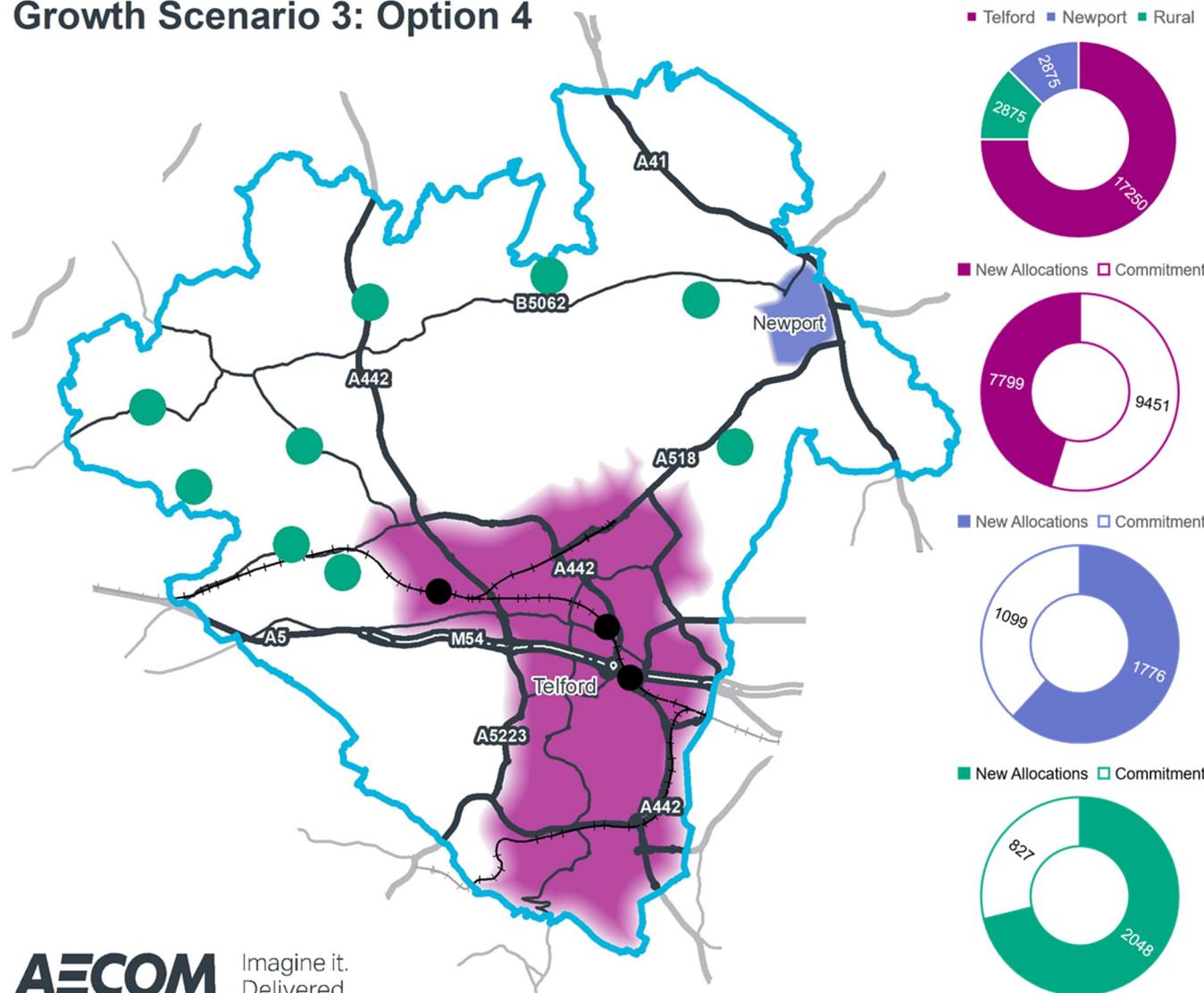


Figure 5.12: Conceptual map for Alternative 3.4

Growth Scenario 3: Option 4



5.4 Summary of appraisal findings

5.4.1 The housing alternatives outlined in Section 5.3 have been appraised on a consistent basis against the IIA framework. The full appraisal findings can be found in Appendix II. Table 5.5 below sets out a visual summary of the IIA findings for each of the alternatives (followed by a summary discussion).

Table 5.5 Summary of appraisal findings for employment options

Significance		Significance	
Major positive	Green	Major negative	Red
Moderate positive	Light Green	Moderate negative	Orange
Minor positive	Light Green	Minor negative	Yellow
Neutral effects	Grey	Uncertainty	?

	Growth Scenario 1				Growth Scenario 2				Growth Scenario 3			
	1.1	1.2	1.3	1.4	2.1	2.2	2.3	2.4	3.1	3.2	3.3	3.4
Biodiversity				?			?					?
Air quality					?							
Water resources	?	?	?	?	?	?	?	?	?	?	?	?
Soil and land												
Landscape									?			
Historic Environment					?		?					?
Waste												
Climate change resilience									?			
Climate change mitigation				?					?			?
Housing				?				?	?			
Health and Wellbeing									?	?	?	?
Economy and Infrastructure								?	?			
Transportation												
Equality and Diversity					?		?		?	?	?	?

Lower end of range

5.4.2 At the lower end of the needs range, there is little to separate the options across the full range of sustainability topics. None of the sites are understood to be particularly sensitive with regards to biodiversity and water resources, and each is predicted to have limited effects with regards to waste. Likewise, effects in terms of flooding are likely to be limited for each option, and each site is of a scale to achieve mitigation in terms of SUDs, avoidance of any watercourses and flood areas etc. Cumulatively, a loss of greenfield could have minor effects on factors such as the urban heat island.

5.4.3 All of the sites involved for each option contain agricultural land to some extent, with much of this being best and most versatile. Therefore, whichever combination of sites is involved, moderate negative effects are predicted. For landscape, the impacts are likely to be less prominent for option 1.1 (North Telford) overall, with options 1.2 and 1.3 involving some more sensitive parcels of land. This is the key difference between the options in environmental terms.

5.4.4 With regards to socio-economic benefits, each option is predicted to have positive effects as they will all provide employment in appropriate locations that will help provide jobs and investment. The options that place more growth close to or accessible to deprived communities (1.1 and 1.2) are considered more likely to bring greater benefits in terms of equality and diversity.

5.4.5 In terms of infrastructure investment, an approach that delivers significant growth in one location could bring greater potential for improvements to road networks, sustainable travel networks and access to new services and facilities. This is particularly the case if housing is delivered alongside new employment. In this respect, option 1.1 performs most favourably.

5.4.6 In terms of health and wellbeing, all three options are likely to have mixed effects. On one hand, jobs will be created in areas that are accessible to communities that could benefit from investment and employment opportunities. However, on the other, there is potential for development to have amenity effects on nearby communities (visual impacts, increased noise and traffic etc). Broadly speaking, at the lower end of the needs range option 1.1 performs marginally better overall compared to the other two options. However, there are uncertainties relating to effects as scheme details may well lead to a more or less positive outcome than predicted at this stage. With the exception of land and soil resource use, it ought to be possible to mitigate negative effects in relation to each of the sustainability topics.

Higher end of range

5.4.7 At the higher end of the needs range, whilst the effects are likely to be of slightly greater magnitude, this does not translate to more or less significant effects for the majority of sustainability topics. For example, effects in relation to biodiversity, air quality, water resources, historic environment, waste, climate change adaptation and climate change mitigation remain of the same degree of significance for each option.

5.4.8 The only difference is that in some instances, the effects are considered more likely to arise / there is less uncertainty.

5.4.9 The increase in land loss, means that further agricultural land would be affected, and it would most likely need to involve the higher Grade 2 resources. As such, major negative effects are predicted for each option. The landscape effects are moderately negative for all options at this scale of growth, as the combinations of sites for each option all involve elements of sensitive land and / or cumulative effects are slightly increased.

5.4.10 In terms of socio economic benefits, it is more likely that major positive effects would arise in terms of employment and infrastructure for all three options, and this could also translate to increased positive effects in terms of health.

5.4.11 It is more difficult to separate the overall performance of the options at the higher end of the needs range, as each involve sites with similar characteristics and similar combinations. The key differences relate to the potential for transport enhancements and positive implications with regards to equality and diversity, which are best reflected by option 2.1 (but not significantly differently to the other options).

5.5 Outline reasons for selecting the preferred approach

5.5.1 The draft Local Plan seeks to broadly continue the growth strategy in the existing Telford & Wrekin Local Plan through the distribution of growth based on split of population between Telford, Newport and the rural area. This strategy continues to recognise Telford's role as the boroughs key centre for services, facilities and employment opportunities. This approach also recognises that there is the need to plan for some growth in both Newport and the rural area to support those communities and provide housing that meets their needs over the plan period.

5.5.2 The strategy will also help to meet the Councils objective of balancing growth with protecting the environment and heritage of the borough. Higher level of growth may deliver more housing options and economic development but from the above assessment it would tip the balance against the protection of environmental and heritage assets.

5.5.3 The draft housing requirement identified by the Council is 20,200 over the 20 year plan period. Over half of this growth has already been identified and a further 8,800 homes will be needed through new allocations. At the draft plan stage the Council are consulting on a range of options in relation to sites including 3x potential Sustainable Urban Extensions. Therefore the final set of sites to help deliver the strategy will not be determined until the Regulation 19 pre-submission version of the plan. The final set of sites may also influence the final split of where growth is located albeit the Council do not anticipate this will greatly alter the preferred strategy.

6. Strategic employment options

6.1 Identifying options

6.1.1 The key piece of evidence with regards to the employment strategy is the EDHNA. This study concludes with a range of employment land needs of 167ha – 189ha.

6.1.2 The Council consider it reasonable to test two growth alternatives, one at the lower and one at the higher end of this range. It is considered unnecessary to test a mid-range option, as it would not be significantly distinctive to the other two options.

6.1.3 When calculating the employment land supply for each growth scenario, the Council considers that the need figures should incorporate a 20% buffer for flexibility in supply. Therefore, the following two growth scenarios are considered reasonable.

- Lower end of needs range with 20% flexibility = 200ha
- Higher end of needs range with 20% flexibility = 227ha

6.1.4 With regards to the distribution of employment land, the Council has first identified elements of supply that it considers to be 'constant' and therefore would be a part of any employment strategy option. This includes current permissions, suitable brownfield sites in the urban areas, an allowance for mixed use sites, and an allowance for windfall development. As outlined in table 6.2, this provides a total supply of 101.5 hectares. Options have been explored as to how the residual land supply can be delivered, taking into account the sites that are potentially suitable for employment use. The options are detailed in table 6.2 and a map has been prepared illustrating which sites would be involved for each option. Table 6.1 below outlines the rationale behind the strategy (and combination of sites) behind each option, and why these are considered to be reasonable alternatives.

Table 6.1: Reasonable alternatives for employment strategy

Options	Rationale
A. Lower end of needs range (167ha) with 20% flexibility = 200ha	
A1. Maximise Growth North of Telford and 'top up sites'	Offers the opportunity to build on current strategic employment locations to the north of Telford as well as providing a mix of smaller sites.
A2. Dispersed	Provide a wider range of locations and do not rely on strategic growth to the north of Telford. A2 focuses on Telford as the primary location for employment, whilst A3 recognises a greater role for Newport in addition to growth at Telford.
A3. Dispersed	
B. Higher end of needs range (189ha) with 20% flexibility = 227ha	
B1. Maximise North Telford plus Junction 6	
B2. North Telford without J6	
B3. Maximise growth elsewhere with remainder at N.Telford	A higher level of growth means that more of the sites are required to meet needs. The key difference between options is the extent to which the strategy focuses on strategic growth to the north of Telford.

Table 6.2 Breakdown of employment options

		Lower end of needs range (167ha) with 20% flexibility = 200ha			Higher end of needs range (189ha) with 20% flexibility = 227ha		
		1) Maximise Growth North of Telford and 'top up sites'	2) Dispersed	3) Dispersed	1) Maximise North Telford plus Junction 6	2) North Telford without J6	2) Maximise growth elsewhere with remainder at N.Telford
			variation 1	variation 2			
<i>Constant</i>	Current permissions	76.5	76.5	76.5	76.5	76.5	76.5
<i>Constant</i>	Brownfield urban constant	7	7	7	7	7	7
	<i>Call for Sites ID numbers</i>	498	498	498	498	498	498
		352	352	352	352	352	352
<i>Constant</i>	Mixed use site allowance	6	6	6	6	6	6
	SEA Windfall	12	12	12	12	12	12
	Total constant	101.5	101.5	101.5	101.5	101.5	101.5
	<i>Residual requirement</i>	98.5	98.5	98.5	125.5	125.5	125.5
<i>Variable</i>	North Telford	88	40	40	88	88	15
	<i>Call for Sites ID numbers</i>	263			263	263	263
		277 - assumes 75ha as per 277 (approx 90% of site)	277 (approx 90% of site)	277 - assumes 75ha as per 277 - assumes 75ha as per 277	277 - assumes 75ha as per 277	277	
		525			525	525	
<i>Variable</i>	Cludley	7	27	7	7	7	27
	<i>Call for Sites ID numbers</i>	362	362	362	362	362	362
		364	364	364	364	364	364
		356	356	356	356	356	356
		365					365
<i>Variable</i>	M54 Junction 6		20	20	20		20
	<i>Call for Sites ID numbers</i>	473	473	473		473	
<i>Variable</i>	Newport	4	11	31	11	31	31
	<i>Call for Sites ID numbers</i>	398 (approx 50%)	398 (approx 50%)	398 (approx 50%)	398 (approx 50%)	398 (approx 50%)	398 (approx 50%)
		223	223	223	223	223	223
			399		399	399	
			462		462	462	
<i>Variable</i>	Stockton (A41)						33
	<i>Call for Sites ID numbers</i>					491	
						492	
						493	
						494	
						495	
						496	
	<i>Total residual</i>	99	98	98	126	126	126
	Total Target	200	200	200	227	227	227

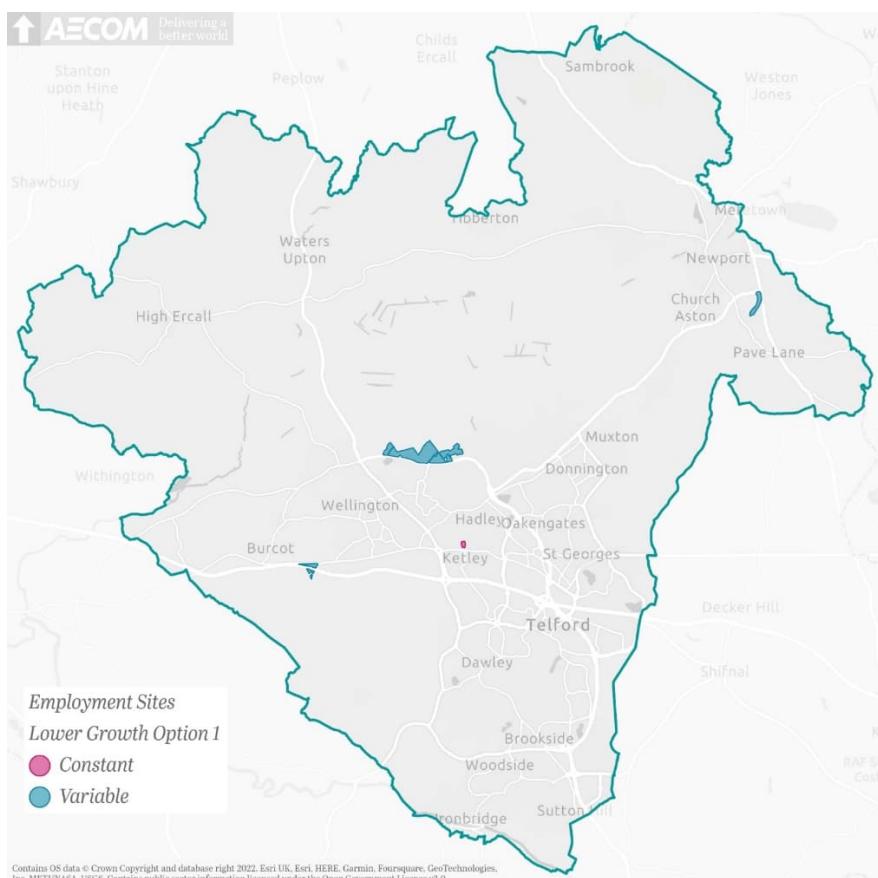
Figure 6.1 Scenario A (Lower growth), Option 1

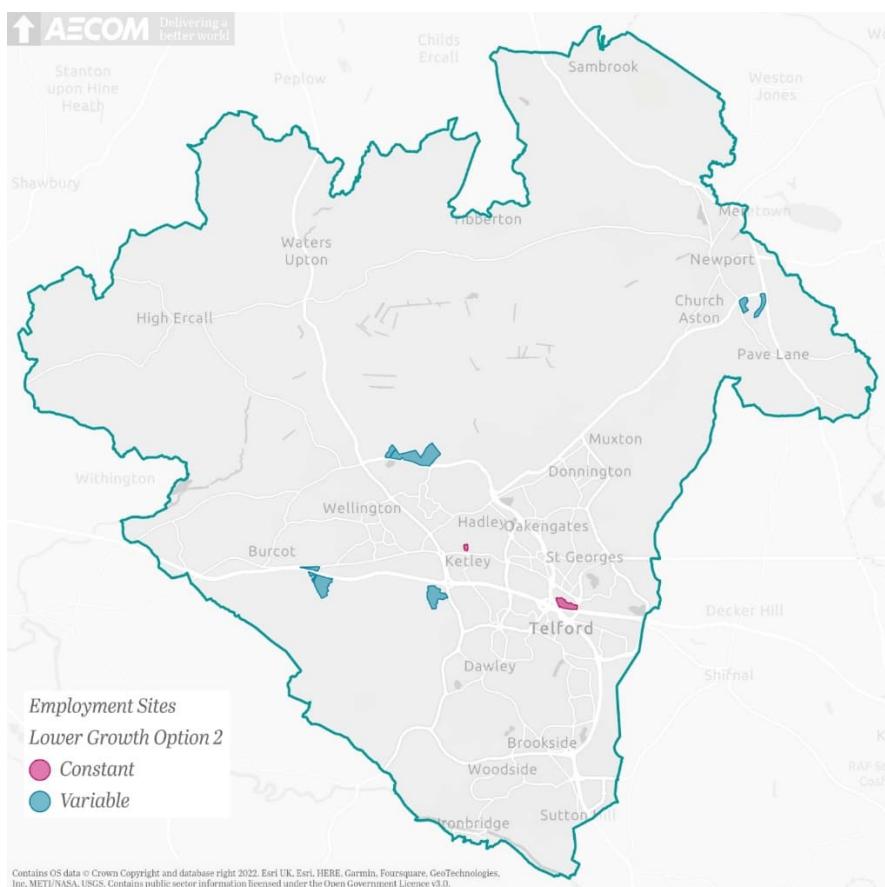
Figure 6.2 Scenario A (Lower growth), Option 2

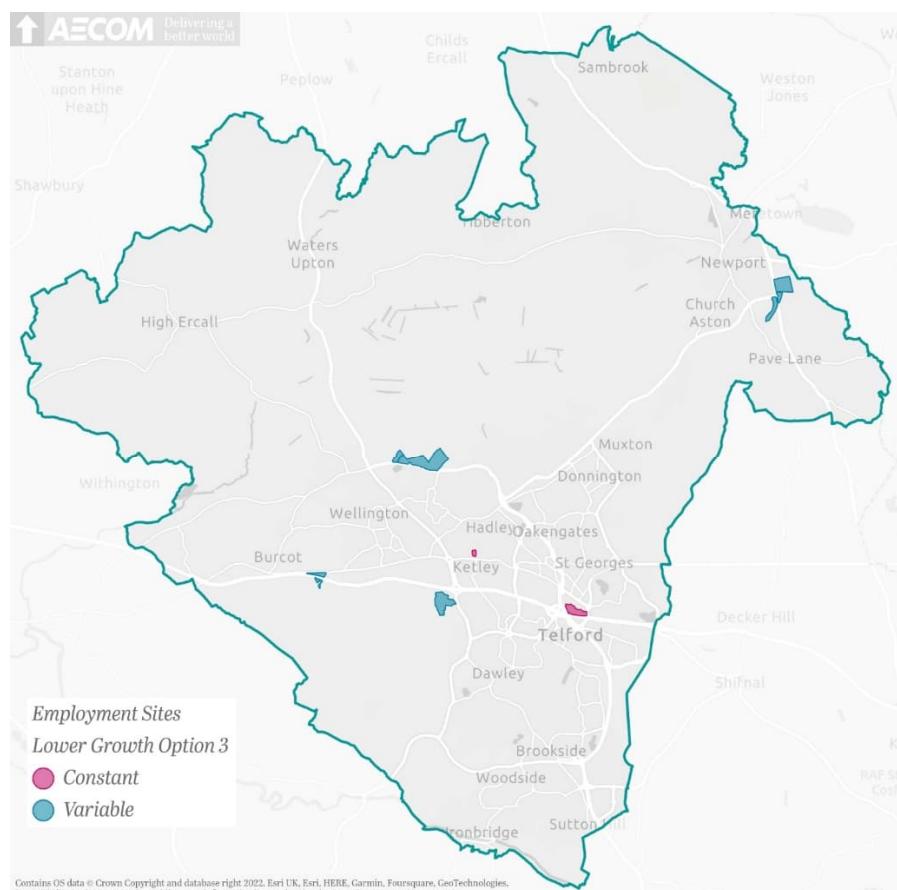
Figure 6.3 Scenario A (Lower growth), Option 3

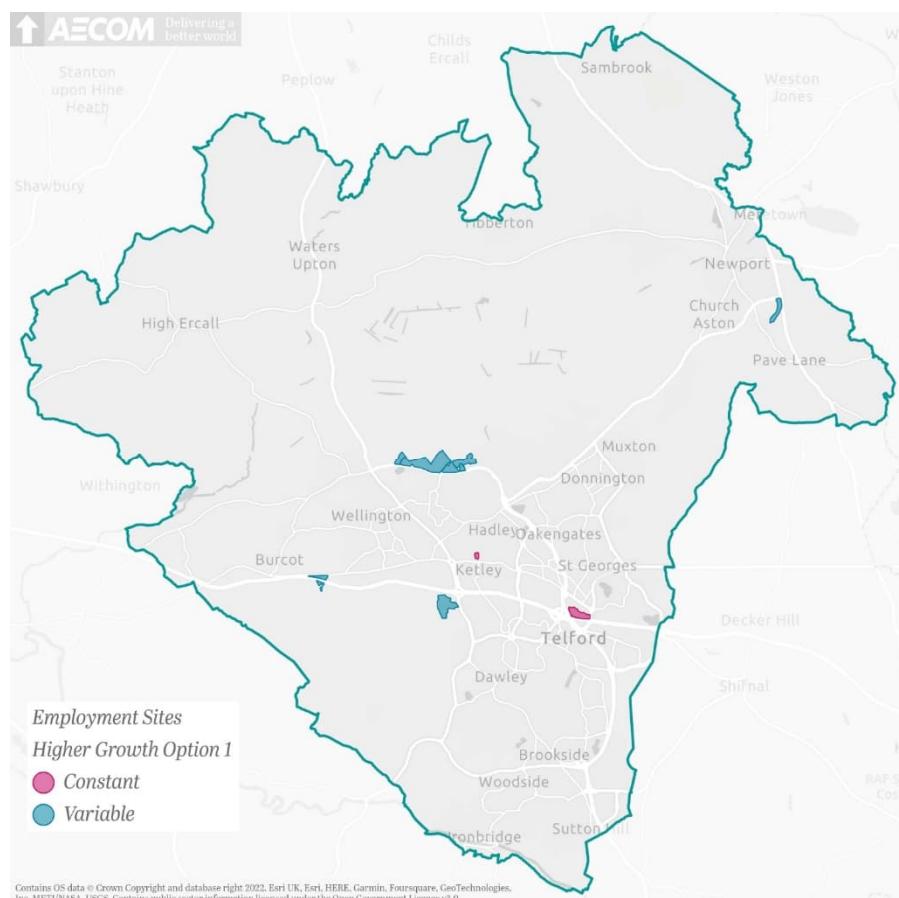
Figure 6.4 Scenario B (Higher growth), Option 1

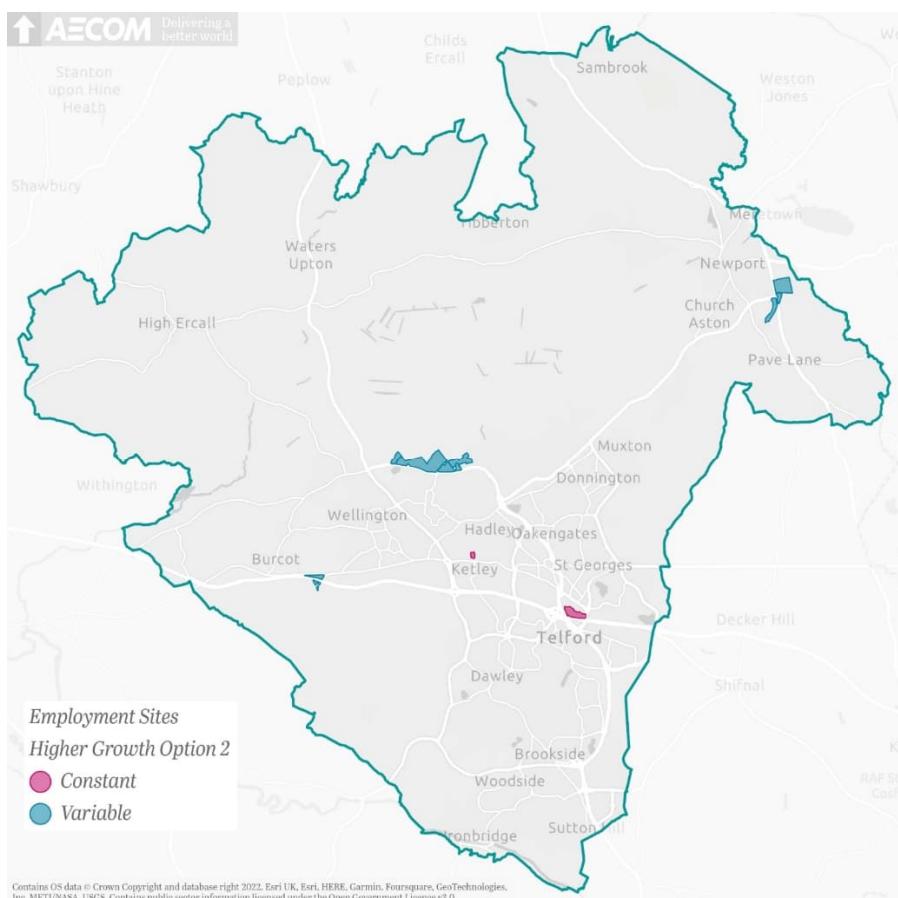
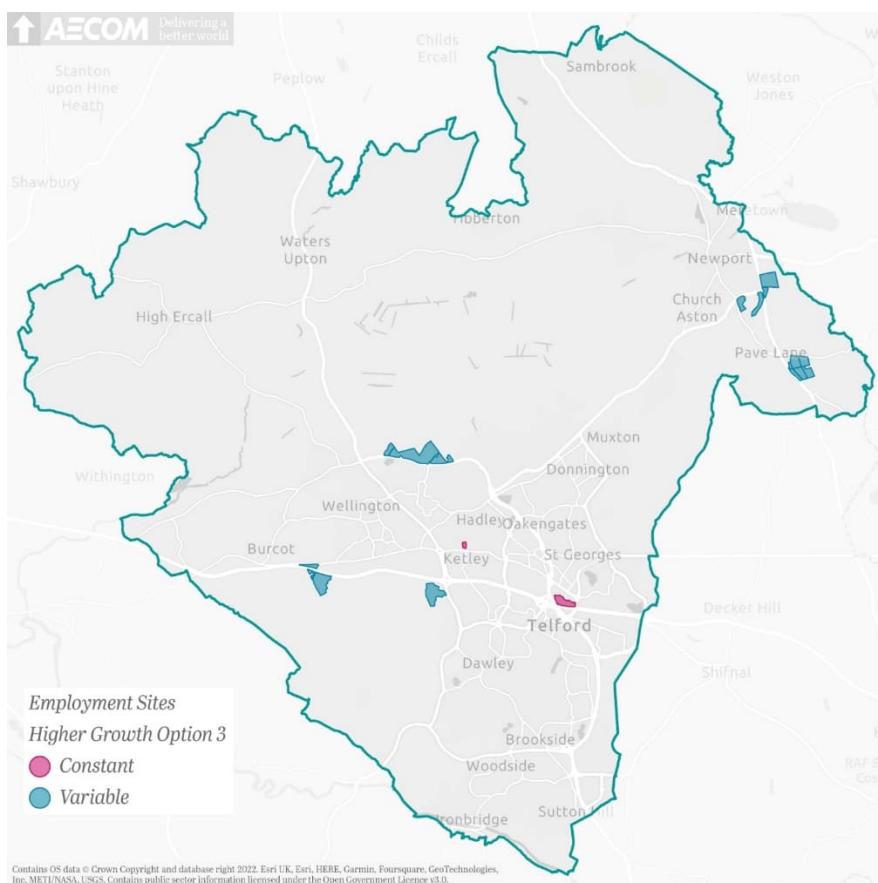
Figure 6.5 Scenario B, Option 2

Figure 6.6 Scenario B, Option 3

6.2 Summary of appraisal findings

6.2.1 The employment alternatives outlined in Section 6.1 have been appraised on a consistent basis against the IIA framework. The full appraisal findings can be found in Appendix III. Table 5.3 below sets out a visual summary of the IIA findings for each of the employment options (followed by a summary discussion).

Table 6.3 Summary of appraisal findings for employment options

Significance		Significance	
Major positive	Green	Major negative	Red
Moderate positive	Light Green	Moderate negative	Orange
Minor positive	Light Green	Minor negative	Yellow
Neutral effects	Grey	Uncertainty	?

	Lower end of needs range			Higher end of needs range		
	1.1	1.2	1.3	2.1	2.2	2.3
Biodiversity						
Air quality	?		?			
Water resources						
Soil and land						
Landscape						
Historic Environment	?		?			
Waste						
Climate change resilience	?	?	?	?	?	?
Climate change mitigation		?				
Housing						
Health and Wellbeing	?	?	?	?	?	?
Economy and Infrastructure						?
Transportation	?					
Equality and Diversity	?					

Lower end of range

6.2.2 At the lower end of the needs range, there is little to separate the options across the full range of sustainability topics. None of the sites are understood to be particularly sensitive with regards to biodiversity and water resources, and each is predicted to have limited effects with regards to waste. Likewise, effects in terms of flooding are likely to be limited for each option, and each site is of a scale to achieve mitigation in terms of SUDs, avoidance of any watercourses and flood areas etc. Cumulatively, a loss of greenfield could have minor effects on factors such as the urban heat island.

6.2.3 All of the options involve sites containing agricultural land to some extent, with much of this being best and most versatile. Therefore, whichever combination of sites is involved, moderate negative effects are predicted. For landscape, the impacts are likely to be less prominent for option 1.1 (North Telford) overall, with options 1.2 and 1.3 involving some more sensitive parcels of land. This is the key difference between the options in environmental terms.

6.2.4 With regards to socio-economic benefits, each option is predicted to have positive effects as they will all provide employment in appropriate locations that will help provide jobs and investment. The options that place more growth close to or accessible to deprived communities (1.1 and 1.2) are considered more likely to bring greater benefits in terms of equality and diversity.

6.2.5 In terms of infrastructure investment, an approach that delivers significant growth in one location could potentially bring greater potential for improvements to road networks, sustainable travel networks and access to new services and facilities. This is particularly the case if housing is delivered alongside new employment. In this respect, option 1.1 performs most favourably.

6.2.6 In terms of health and wellbeing, all three options are likely to have mixed effects. On one hand, jobs will be created in areas that are accessible to communities that could benefit from investment and employment opportunities. However, on the other, there is potential for development to have amenity effects on nearby communities (visual impacts, increased noise and traffic etc). Broadly speaking, at the lower end of the needs range option 1.1 performs marginally better overall compared to the other two options. However, there are uncertainties relating to effects as scheme details may well lead to a more or less positive outcome than predicted at this stage. With the exception of land and soil resource use, it ought to be possible to mitigate negative effects in relation to each of the sustainability topics.

Higher end of range

6.2.7 At the higher end of the needs range, whilst the effects are likely to be of slightly greater magnitude, this does not translate to more or less significant effects for the majority of sustainability topics. For example, effects in relation to biodiversity, air quality, water resources, historic environment, waste, climate change adaptation and climate change mitigation remain of the same degree of significance for each option.

- 6.2.8 The main difference is that in some instances, the effects are considered more likely to arise / there is less uncertainty.
- 6.2.9 The increase in land loss, means that further agricultural land would be affected, and it would most likely need to involve the higher Grade 2 resources. As such, major negative effects are predicted for each option. The landscape effects are moderately negative for all options at this scale of growth, as the combinations of sites for each option all involve elements of sensitive land and / or cumulative effects are slightly increased.
- 6.2.10 In terms of socio economic benefits, it is more likely that major positive effects would arise in terms of employment and infrastructure for all three options, and this could also translate to increased positive effects in terms of health.
- 6.2.11 It is more difficult to separate the overall performance of the options at the higher end of the needs range, as each involve sites with similar characteristics and similar combinations. The key differences relate to the potential for transport enhancements and positive implications with regards to equality and diversity, which are best reflected by option 2.1 (but not significantly differently to the other options).

6.3 Outline reasons for selecting the preferred approach

- 6.3.1 The Council have identified 167ha as its draft employment land requirement. This is in recognition that the higher level of growth identified in the EHDNA including open storage which does not reflect the Council's ambition for inward investment and economic development. The preferred strategy directs the majority of new employment growth to Telford, but recognises that there is a need for new employment provision in Newport as well. A small number of rural sites are also being consulted on at the draft Local Plan stage to provide some level of diversification to the rural economy.
- 6.3.2 The strategy will also see some employment growth via potential Sustainable Urban Extensions that the Council are consulting on. This will provide a balance of uses on those sites and employment opportunities for future residents.
- 6.3.3 The final set of sites and quantum of employment growth will be determined as part of the Regulation 19 submission version of the plan. The Council may ultimately allocate more than the 167ha to provide additional choice and supply for inward investment, should suitable sites be identified.

7. Sustainable Urban Extensions

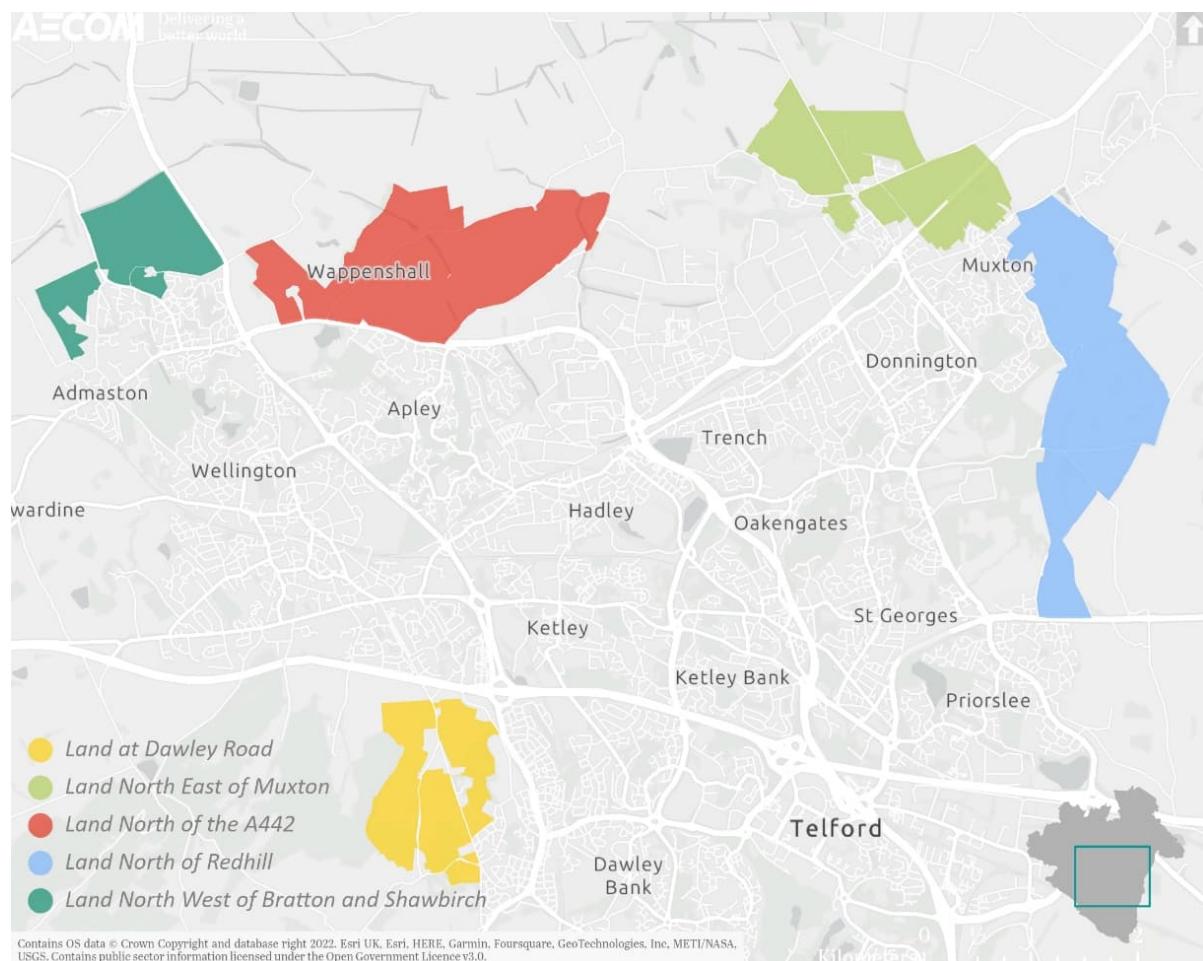
7.1 Introduction

7.1.1 There are a range of locations on the urban periphery of Telford that could accommodate the housing growth necessary to support the spatial strategy (in the form of sustainable urban extensions). Not all of these locations need necessarily be part of the spatial strategy, and there may also be constraints and opportunities at each location that suggest what an appropriate scale and layout of growth would be in the broad locations. As such, the Council considered it helpful to appraise the strategic implications of each broad area of growth (BAG) through the IIA to help aid the decision making process.

7.2 Identifying options

7.2.1 The BAGS were identified by amalgamating large strategic sites on the urban periphery that sit within the same broad locations.

Figure 7.1 Map illustrating the broad areas of growth



7.2.2 As the process developed, the areas have become more refined to reflect the realistic boundaries for Sustainable Urban Extensions within these BAGs. The potential SUEs reflect the boundaries of land parcels that have been submitted through the call for sites, and in some instances, schemes have already been proposed for specific sites. Figures 7.2 – 7.6 below illustrates the land parcels that have been brought together to represent each of the potential SUEs.

Figure 7.2 Land at Dawley Road



Figure 7.3 Land North of Redhill

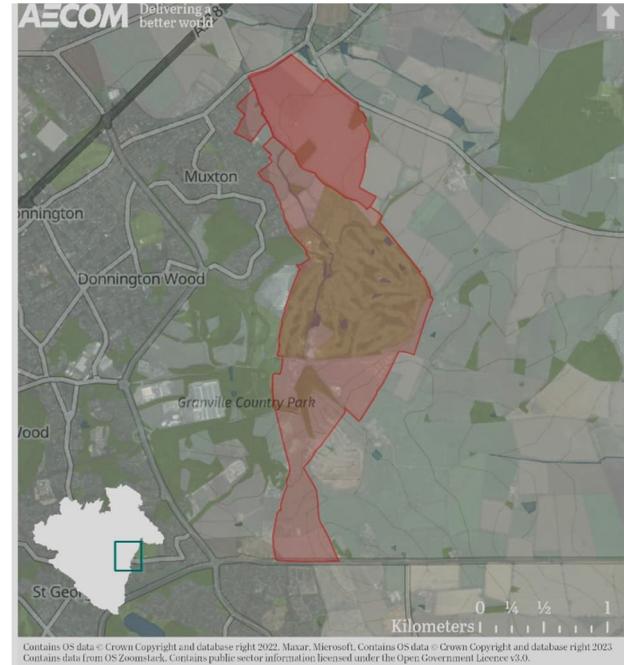


Figure 7.4 Land north of the A442

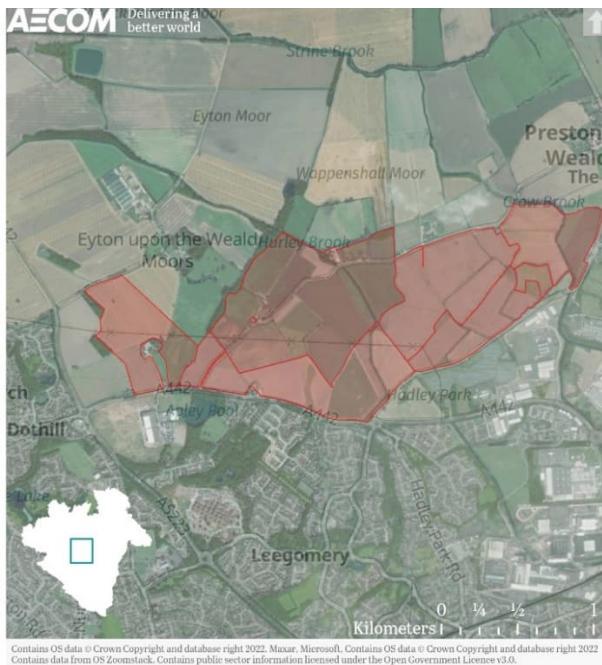


Figure 7.5 Land NE of Muxton

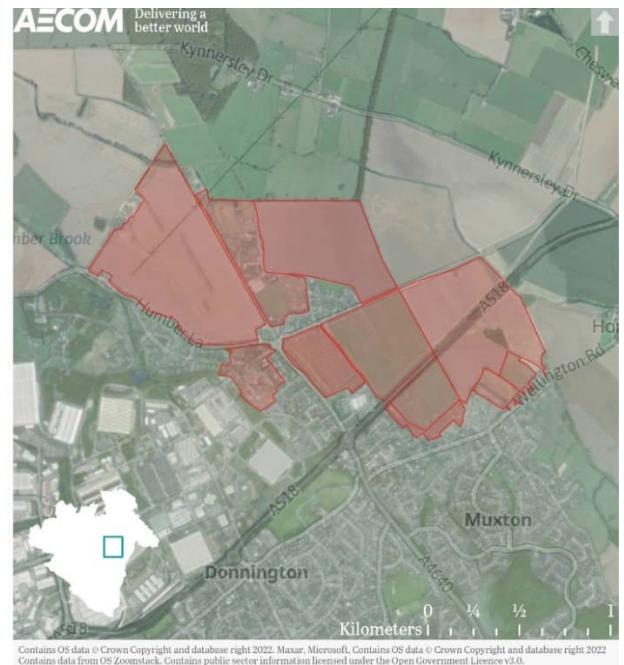
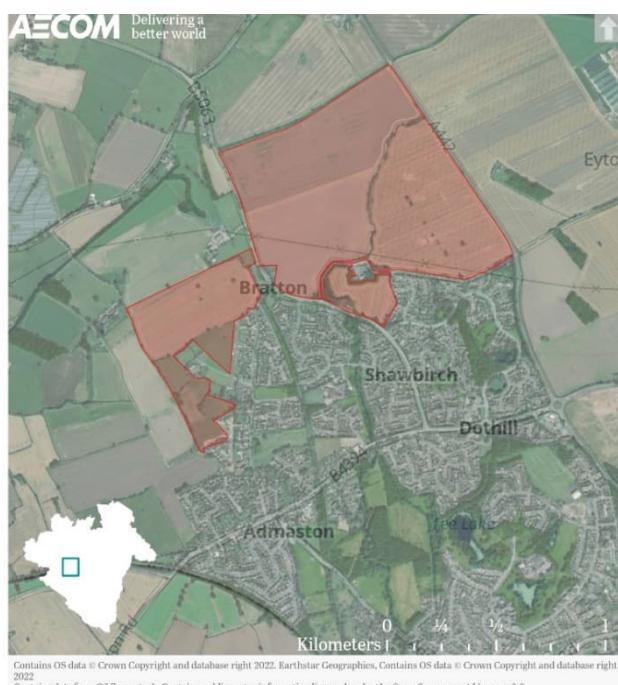


Figure 7.6 Land NW Bratton and Shawbirch



7.3 Summary of appraisal findings

- 7.3.1 The SUE options perform similarly for many of the sustainability topics, which is to be expected given that they are all large scale opportunities that can bring significant benefits in terms of housing delivery, infrastructure improvements, new facilities and services and the potential to deliver high quality sustainable design. The key differences relate to strategic environmental constraints, though it should be noted that mitigation and enhancement ought to be possible.
- 7.3.2 Land at Dawley Road is flagged as being potentially the most negative option with regards to landscape, given its location close to the AONB and the higher sensitivity that the landscape assessment affords to some of the parcels of land involved. Though mitigation could help to minimise the effects, it is still considered to be more negative than any of the other options in this respect. This site is also closer to biodiversity designations and contains on site features, so is most negative in this respect too. Conversely, though this site contains some agricultural land, it is less expansive and lower quality than what would be involved at the other SUEs. It is also well located in relation to strategic road networks and could potentially bring some benefits to deprived communities to the north west of the Telford urban area. However, it also brings potential air quality concerns given its location close to motorway junctions and areas of air quality concern to the north near Arlestone.
- 7.3.3 The site to the north of the A442 is the only site where potential major positive effects are predicted with regards to economy, as this could bring mixed use development in an area that already contains significant employment land and proposed employment growth at Shawbirch nearby.

7.3.4 The key environmental constraint for this SUE is the loss of Grade 2 agricultural land, which would be unavoidable and therefore a major negative effect. However, there could be good opportunities to enhance biodiversity networks, and the potential for effects on heritage and landscape are considered to be minor. The site may offer some benefits for deprived communities to the north east of the Telford urban area, but could also bring increased traffic through the urban area in areas of greater concern.

7.3.5 The site NE of Muxton is relatively unconstrained in terms of environmental factors, with the major constraint being loss of land that is likely to be Grade 2 or 3a agricultural land. However, as it is more peripheral and not near to existing employment areas the effects on economy and communities are potentially less positive compared to some of the other SUEs.

7.3.6 Land North of Redhill has potential significant constraints with regards to biodiversity, and is also likely to affect high quality soils in places. However, other environmental constraints ought to be minimal and possible to address. This location is quite peripheral to Telford urban area and would also involve the loss of a golf course. The effects for health and economy are therefore somewhat less positive compared to other SUEs.

7.3.7 Land NW Bratton and Shawbirch has some potential constraints in relation to a range of environmental factors, but aside from soil resources, these are only considered likely to be minor and there should also be potential for mitigation and enhancement. The site has good access to planned employment growth and is therefore considered favourable in terms of co-locating homes and employment growth.

Table 7.2 Summary of SUE appraisals

Significance	
Major positive	Green
Moderate positive	Light Green
Minor positive	Light Green
Neutral effects	Grey

Significance	
Major negative	Red
Moderate negative	Orange
Minor negative	Yellow
Uncertainty	?

	Land at Dawley Road	Land NE of Muxton	Land North of the A442	Land North of Redhill	Land NW Bratton & Shawbirch
Biodiversity	Orange	Grey	Grey	?	Grey
Air quality	?	Grey	?	Grey	?
Water resources	Grey	Grey	Grey	Grey	?
Soil and land	Yellow	Red	Red	Orange	Red
Landscape	?	Yellow	Yellow	Yellow	Yellow
Historic Environment	?	Grey	Yellow	Yellow	?
Waste	Grey	Grey	Grey	Grey	Grey
Climate change resilience	?	?	?	?	?
Climate change mitigation	?	?	?	?	?
Housing	Light Green	Light Green	Light Green	Light Green	Light Green
Health and Wellbeing	Light Green	Light Green	Light Green	Light Green	?
Economy and Infrastructure	?	Grey	Green	Grey	Light Green
Transportation	Light Green	Light Green	Light Green	Light Green	Light Green
Equality and Diversity	?	Grey	?	Grey	Grey

7.4 Rationale for selecting the preferred approach

7.4.1 At the current stage of plan-making, the Council had determined that strategic growth should form part of the spatial strategy.

7.4.2 Of the five locations tested, three are being considered further, and two have been discounted.

7.4.3 The three potential Sustainable Urban Extensions that are being considered further are:

- Land north west of Bratton and Shawbirch
- Land north of the A442
- Land north east of Muxton

7.4.4 These are being taken forward for consultation as part of the draft Local Plan stage. At Regulation 19 submission stage the Council will determine which sites in whole or in part will be part of the final version of the Local Plan.

7.4.5 The potential Sustainable Urban Extensions 'land at Dawley Road' and 'land at Redhill' are not being progressed as SUE options. The individual component sites have been assessed through the site process and a number of those sites are subject to consultation as part of the Regulation 18 stage.

7.4.6 The land at Dawley Road has been discounted as a potential SUE due to the fact that over 60% of the site is in an area of very high landscape sensitivity and visual sensitivity. A portion of the site is also within the Wrekin Strategic Landscape area which emerging landscape character evidence suggests should not be subject to larger scale developments such as this. Discounting the 60% + site area with very high landscape issues means the remainder of the site would be unable to deliver a cohesive SUE proposal.

7.4.7 The land north of Redhill is adjacent to the western edge of Telford, however there is limited permeability with the urban area with the only existing east / west route through an adopted Local Nature Reserve. The route is effectively a narrow country lane and would require significant upgrade to accommodate more traffic flows. The Sustainable Urban Extension proposal would have to rely heavily on north / south highway infrastructure. This would require access points on to sections of the network that are either not suitable for upgrade, in the absence of a link to the primary route network to the north. In the case of the south of the site the highway network has been subject to significant change and has limited opportunity to accommodate more change with significant investment and re-engineering of recently completed works.

8. Individual site appraisals

8.1.1 To help inform the appraisal of strategic options as well as to aid the decision making process with regards to additional site allocations, a range of reasonable site options were identified by the Council and have been tested through the SA process.

8.1.2 The methodology for determining potential effects is provided at Appendix E. The scoring ensures a consistent approach is used to assess each individual site against a series of assessments which relate to the sustainability of sites.

8.1.3 Analysis broadly focuses on a site and its spatial relationship to various environmental assets. This includes assessments focusing on:

- A site's proximity to or overlap with spatial designations or land uses (including social, economic and environment assets) (for example, areas at risk of flooding, land designated for its species or habitats or employment land);
- A site and its proximity to certain land uses by road distance (for example a school, train station or park); and
- A site and its qualitative relationship with its surroundings, including through views, local contextual factors and surrounding designations and assets (for example assets of historical significance or amenity related matters).

8.1.4 It is important to note that no individual site assessment result is considered to be of a significance which would rule out a site on one single criteria. All results should be read and interpreted in combination alongside the appraisal of packages of sites within option appraisals, which consider a range of qualitative and quantitative factors.

8.1.5 The site appraisal methodology and outputs can be seen at Appendix E.

9. Appraisal of the Draft Plan

9.1 Introduction

9.1.1 The draft Plan has been appraised and summarised in this section of the SA Report. The full draft Local Plan appraisal can be found at Appendix F. The Plan has been appraised ‘as a whole’, taking into account the potential for effects associated with new development (primarily the new allocations) but accounting for all of the policies within the Plan. This is important for several reasons:

- Plan policies can help to mitigate negative effects and enhance positives.
- Policies within the Plan work together and can have cumulative/synergistic effects that need to be identified within the SA.

9.1.2 At this stage the Council have not identified specific sites for allocation, rather, they have identified a shortlist of site options (Figure 9.1) which are intended as a pool of sites from which allocations will be made. Appraisals have been undertaken considering this pool of sites, with an understanding that not all will require allocation in order to meet the development needs of the Borough.

9.1.3 Whilst all the policies have been considered individually, their effects are discussed in overall terms, rather than on a policy-by-policy basis. However, references have been made to specific policies where it is considered that they make a particular contribution to the IIA topics.

9.1.4 In determining the significance of effects, professional judgement has been applied, being mindful of key effect characteristics including: magnitude, likelihood, duration, timeframe and cumulative effects. A range of information sources have been utilised to inform judgements:

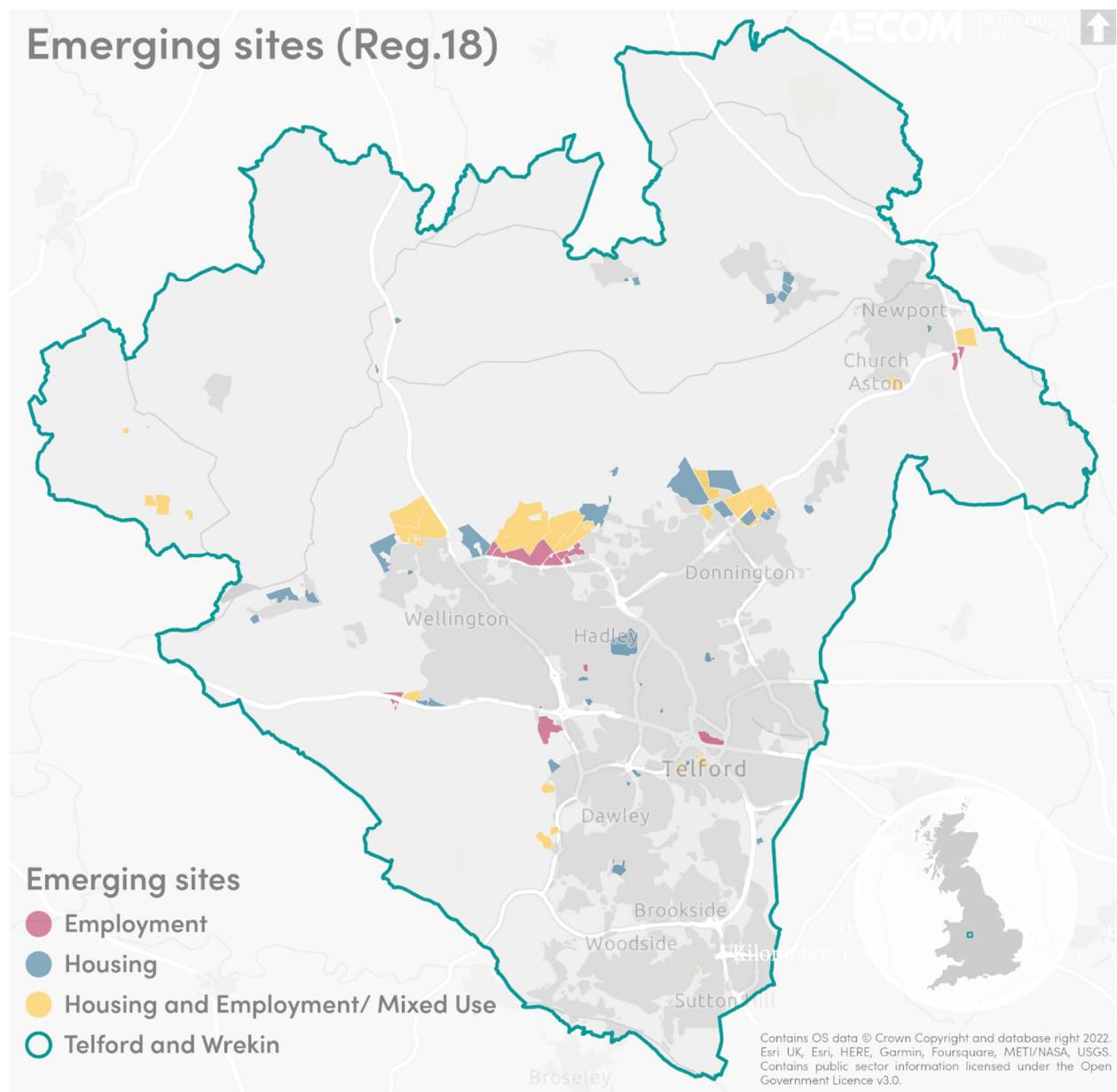
- Geographical Information Systems data (which also sets out a high level appraisal of each reasonable site option).
- Inputs from technical studies.
- Reference to the Scoping Report and Interim SA Reports.

9.1.5 Whilst every effort is taken to predict effects accurately, there is a degree of uncertainty that must be acknowledged given the strategic nature of the appraisal. In particular, the level of detail is less granular with regards to specific on site characteristics, so there is a reliance on higher level datasets (for example; the presence of designated environmental assets).

9.1.6 It is important to ensure a consistent comparison between the options. For this reason, the same high-level assumptions are made with regards to mitigation and enhancement. The policies within the Plan have been taken into account when determining the significance of effects at this stage.

9.1.7 However, rather than taking into account specific scheme details (which may be available for some locations and not others), the appraisal identifies the baseline situation and how development could affect this. This is not to say that such effects could not be different when mitigation and enhancement considerations are fully appreciated at a project scale.

Figure 9.1: Refined site options to inform the appraisal of the draft Local Plan at Regulation 18 stage.



9.2 Summary of the draft Local Plan appraisal

Significance	
Major positive	
Moderate positive	
Minor positive	
Neutral effects	

Significance	
Major negative	
Moderate negative	
Minor negative	
Uncertainty	?

Biodiversity

9.2.1 Overall, whilst the spatial strategy might give rise to some potential minor negative effects (relating to the proximity to biodiversity designations, development on greenfield land and potential interferences with trees and hedgerows), the Plan's policies ought to mitigate adverse effects to an acceptable level and in the longer term provide biodiversity enhancements and net gains. However, there is still a degree of uncertainty relating to the methodology and effectiveness of net gains. Nevertheless, there is a clear commitment to exceed net gain on suitable sites, to enhance urban greening and to continue protection of biodiversity habitats and species. Therefore, **uncertain moderate positive** effects are predicted at this stage.

Air quality

9.2.2 The Telford and Wrekin Local Plan is likely to lead to some increases in motor vehicle usage across the Borough, especially in areas which are expected to see higher levels of housing growth such as Telford. This could be more pronounced around the north of Telford nearby to larger areas of growth, which could also increase the prevalence of heavy goods vehicles near to somewhat more sensitive locations already experiencing air quality pressures. Effects would be likely to be most pronounced at traffic pinch points and at peak journey times. That said, the Plan seeks to mitigate adverse effects through policy which promotes active and public transport choices, helps to facilitate an increase in electric vehicle usage and protects and enhances the Plan area's provision of green infrastructures which may help to mitigate poor air quality to some extent. In this sense, more significant effects ought to be avoided, with only **minor negative** effects predicted overall.

Water resources

9.2.3 The pool of sites in the Telford and Wrekin draft Local Plan have the potential to lead to some mixed effects. There are potential negatives coming through the contamination of watercourses nearby to growth, which may be somewhat heightened by the presence of multiple water-quality related designations in the Borough. However, several policies ought to mitigate this, with requirements for appropriate management of various forms of drainage and water flows, efficient usage of water resources (including reuse and recycling) and measures to reduce effects upon water quality in the Borough, especially on sensitive sites.

9.2.4 Some positive effects may be seen by turning agricultural land (or land with the potential to be used for agricultural purposes) into alternative uses, in turn driving down the potential for water quality issues related to fertilisers (nitrates and phosphates). There is also a requirement to ensure that water consumption is minimised in new development.

9.2.5 Overall, **minor positive effects** are predicted.

Soil and land

9.2.6 Overall, the Plan seeks to direct development onto land which is less valuable in terms of agricultural potential, which is previously developed where possible and which attempts to avoid the potential sterilisation of safeguarded minerals. However, some allocated sites and potential windfall development is expected to come forward on sites which do not meet these aspirations, and hence some negative effects are anticipated, especially in relation to strategic growth on greenfield land. Whilst policy might mitigate this somewhat, **moderate negative** effects are still anticipated given the potential for large scale greenfield land development on agricultural land. It is recommended that allocations / development on greenfield land is supported by an understanding of the quality of agricultural land. Where possible, sites with higher quality soils should not be allocated, or where development is proposed on such sites, the pockets of land within sites containing higher quality soil resources could be set aside as areas of open space/green infrastructure/landscaping.

Landscape

9.2.7 Overall, the draft Plan's spatial strategy prioritises development on sites within the built-up area and on sites with lower landscape and visual sensitivities. However, it is likely that strategic areas of growth (to the north of Telford for example) would lead to more significant effects on the landscape due to the scale of change involved.

9.2.8 Further effects (more marginal) might be seen in peripheral locations, especially around Telford and rural areas and nearby to the AONB. However, only small-scale sites are likely to be involved, and the magnitude of effects would be limited, particularly when Plan policies are applied to ensure high quality and locally relevant design and through the enhancement of green infrastructure.

9.2.9 Effects may also be seen in locations within the built-up areas of the Borough where the local character plays a strong role in forming the townscape. Conversely, positive effects could be achieved were urban development leads to an improved public realm.

9.2.10 Overall, whilst policy will help to mitigate the effects of development, some residual **minor negative** effects are likely to be unavoidable on larger scale developments on the periphery of settlements.

Historic Environment

9.2.11 The growth and spatial strategy (in the context of the potential sites) should enable the most constrained sites, or those with little prospect of successfully mitigating effects upon the historic environment, to be omitted from allocation. However, it is likely that some planned-for development could be near areas of sensitivity in relation to the historic environment. This could lead to effects upon the significance of heritage assets such as listed buildings (mainly through a change to the 'rural' landscape in parts of the borough).

9.2.12 The significance of effects would be dependent upon the exact sites proposed for allocation, the layout and design. With that being said, a range of policies in the Plan should ensure that future development considers the historic character of the Borough, as well as specific impacts on the setting and significance of designated and non-designated heritage assets. In this respect, it is predicted that any negative effects would be minor to moderate.

9.2.13 There are also a range of supporting policies that are likely to have positive secondary effects on heritage including policies that support green infrastructure, reuse of land and buildings, and high-quality design.

9.2.14 On balance, whilst effects are expected to be largely mitigated by policy requirements, development is likely to have some residual negative effects in particular parts of the Borough. Therefore, uncertain **minor negative** effects are predicted.

Waste

9.2.15 The spatial strategy is likely to place most new growth in locations that have good access to a HWRC and where waste collection should be relatively effective and efficient. In some locations accessibility and waste collection could be less efficient, but this only applies to a small amount of development across the borough/

9.2.16 Several plan policies ought to help to ensure that the Borough's waste demands are met and managed efficiently, but it should also be recognised that construction waste is likely to be substantial because of strategic growth. On balance, **neutral** effects are predicted.

Climate change resilience

9.2.17 In terms of fluvial flood risk, the spatial strategy is likely to avoid areas which are identified as at heightened risk (flood zones 2 and 3). Though there are some potential intersections with strategic development opportunities, there ought to be capacity to avoid building on sensitive parts of sites.

9.2.18 Regardless of current flood risk, where development occurs on greenfield land, an associated increase in runoff rates is likely to be seen, with more profound effects on and around larger sites. In this sense, areas on Telford's periphery, especially the north and west are likely to be more affected.

9.2.19 However, there will be a need to ensure that future development does not increase flood risk on or off site and that developments are better prepared to handle extreme heat or cold weather events. The draft Plan also supports the protection and enhancement of green infrastructure and multi-functional environments. Such policy measures should be sufficient to ensure that significant negative effects do not arise as a result of growth.

9.2.20 At this stage, an **uncertain** effect is predicted with regards to climate change resilience. It is considered possible that positive effects could arise, depending on the layout and site-specific requirements for growth; with particular opportunities on strategic sites if a green infrastructure-led approach is required. However, in the absence of a proactive policy direction, it is also possible that strategic growth may not fully realise opportunities for climate change resilience, leaving neutral or potentially minor negative effects.

Climate change mitigation

9.2.21 Overall, the spatial strategy and policies in the Local Plan would see opportunities to reduce per capita GHG emissions through transport related measures as well as energy efficiency and generation schemes and some small scale carbon sequestration efforts. There would also be an anticipated short to medium-term increase GHG emissions related to an increase in car journeys in the Borough, linked to a high concentration of peripheral, less dense development. Overall, the Plan is likely to lead to some **minor positive** effects on climate change mitigation in the longer term (accepting the fact that an increase in development is likely in any case).

Housing

9.2.22 Overall, the Plan provides a positive spatial strategy and associated policies to deliver the identified housing need across the Borough. The concentration of growth in Telford would see the majority of effects under the strategy experienced there, with some improvements to housing quality and sustainably located housing nearby to jobs and services leading to positive effects. The level of growth in Newport would go some way towards improving housing quality and affordability, though this low number of additional dwellings would likely mean that these effects are minor and there are some uncertainties about meeting the proposed level of housing over the Plan-period.

9.2.23 The level of housing in rural areas would potentially improve rural housing affordability, but the low level of proposed growth means that these effects are uncertain and likely to be minor.

9.2.24 Several policies in the Local Plan seek to ensure that a locally relevant mix of housing types, sizes, affordability, tenures and specialist need is delivered to proactively plan for the needs of current and future residents. Future housing sites are expected (in accordance with policy) to help to deliver supporting infrastructure, services and place-making strategies which help to ensure that Telford and Wrekin remains an attractive place to live. Overall, **major positive** effects are predicted.

Health and wellbeing

9.2.25 Overall, the draft Plan is expected to lead to positive effects, largely related to the ability to concentrate significant amounts of new housing growth around Telford and its periphery. This would bring forward locations that are broadly accessible to health, education and open, green and natural spaces and facilities. There are adjacent communities at the Telford periphery that are experiencing higher levels of deprivation, and therefore, a coordinated approach to growth could lead to spill-over benefits to these areas (for example access to new services, higher quality housing and improved open space). Whilst effects relating to the spatial strategy in Newport and Rural areas would be beneficial, the scales of growth in these locations are considerably smaller, making significant effects less likely. Plan policies provide support for developments which facilitate health lifestyles, including through encouraging active travel and lifestyle choices, providing access to healthcare facilities and maintaining and enhancing the Bourgh's stock of green and natural spaces. This is expected to boost mental and physical health outcomes. **Major positive** effects are predicted.

Economy and Infrastructure

9.2.26 Overall, the spatial strategy is likely to provide effects which are directly related to the scale of growth across different areas of the Borough. These effects are expected to be related to increased local GVA, suitable housing in accessible locations to employment sites, increased local employment, skills development, increased footfall in shops and local/district centres and a degree of alleviated deprivation. These effects would be most pronounced in north Telford and proposed locations for new employment land.

9.2.27 Policy in the Plan provides further support for development which boosts economic growth, infrastructure delivery and skills development, with more specific policy promoting suitable employment developments in specific locations, paying attention to local considerations and the need to meet identified employment land needs. Overall, **major positive** effects are predicted.

Transportation

9.2.28 Overall, the majority of growth and associated effects would be expected to be seen in Telford, with some more minor effects in Rural Areas and Newport.

9.2.29 There is likely to be an increase in car trips and congestion, particularly to the north of Telford, but policy provisions are also likely to see an increase in sustainable modes of travel and fewer / shorter trips. A range of policies in the draft Plan seek to mitigate adverse effects of congestion stemming from housing and employment development, but it is likely there will be some residual negative effects, particularly during the construction phase of new developments and before infrastructure improvements have been secured.

9.2.30 More positively, growth would be expected to be delivered a manner which reduces the need to travel, and, where sites are clustered or of a large scale, improvements to existing active and public transport infrastructures and services are likely to be seen. Overall, a mix of **moderately positive** and **minor negative** effects are predicted.

Equality and diversity

9.2.31 Overall, a broadly positive approach to the distribution of development is taken, with effects relating to development and its ability to provide infrastructure, services and facilities which help to reduce equality related issues realised most significantly to the north of Telford, nearby to larger areas of growth.

9.2.32 Further effects will be seen within Telford, with a reduced magnitude of significance and more isolated effects in Newport and Rural areas given the smaller scale of growth involved. A range of policies promote positive effects, which should ensure that development targets the needs of a range of people from minority backgrounds and with varying specialist needs relating to physical and mental abilities. Overall, **moderate positive** effects are predicted.

Summary of effects

SA Topic	Likely Plan Effects	
Biodiversity	Uncertain moderate positive effects	
Air quality	Minor negative effects	
Water resources	Neutral effects	
Soil and land	Moderate negative effects	
Landscape	Minor negative effects	
Historic Environment	Uncertain minor negative effects	
Waste	Minor positive effects	
Climate change resilience	Uncertain effects ?	
Climate change mitigation	Minor positive effects	
Housing	Major positive effects	
Health and Wellbeing	Major positive effects	
Economy and Infrastructure	Major positive effects	
Transportation	Moderately positive effects	Minor negative effects
Equality and Diversity	Moderate positive effects	

10. Recommendations

10.1.1 This section summarises the key mitigation and enhancement measures that have been identified through the IA of the draft Plan (and reasonable alternatives) at this stage. Given that there are still choices to be made with regards to broad areas of growth and site allocations, some of the recommendations relate to spatial matters such as locations for growth. Other measures relate to thematic policies and generally seek to pose a challenge to the Plan in terms of seeking to achieve the highest standards of sustainability. However, it is acknowledged that there may be barriers to the implementation of such recommendations (such as viability), and there will also be trade-offs to be made between sustainability factors when considering locations for growth. The following list of measures is a summary taken from the options and draft Plan appraisal:

- It is recommended that allocations / development on greenfield land is supported by an understanding of the quality of agricultural land. Where possible, sites with higher quality soils should not be allocated (if there are lower sensitivity alternatives), or where development is proposed on such sites, the pockets of land within sites containing higher quality soil resources could be set aside as areas of open space/green infrastructure/landscaping.
- It is recommended that once site allocations and Broad Areas of Growth are confirmed that suitable site policies are developed that consider a range of site-specific factors (of which historic environment is an important consideration).
- There is potential for habitat enhancement to be secured on strategic growth to the north of Telford. This should form a key part of site specific policy.
- The amount of growth directed to the west of Telford ought to reflect the sensitive landscape character and setting of the AONB.
- Consider identifying additional site allocations in Newport to avoid speculative growth in unsuitable locations.
- Consider a policy that requires Health Impact Assessment for major developments.
- Explore whether increased growth in certain rural settlements will create a critical mass to support new facilities in (currently) less accessible locations.
- Ensure that broad areas of growth have excellent accessibility by foot and sustainable modes of transport to ensure they benefit surrounding rural communities.
- Consider requirement of a country park as part of broad areas of growth to relieve recreational pressure on SSSIs and the AONB.
- Consider traffic management measures (in the infrastructure development plan) that reduce through traffic and congestion in the Telford urban area, particularly in locations with air quality concerns. This could help to ensure that additional growth does not contribute negatively to congestion and air quality.
- Require new strategic employment land to perform to high levels of sustainability such as BREEAM 'Excellent'.

11. Monitoring and next steps

11.1 Monitoring

- 11.1.1 There is a requirement to outline the measures envisaged to monitor the predicted effects of a local plan. In particular, there is a need to focus on the significant effects that are identified.
- 11.1.2 At this stage the monitoring measures have not been finalised, as the Plan is still in draft form. There are still key decisions to make and the effects could change as the Plan moves towards submission stage. There is also a need to confirm the feasibility of collecting information for the proposed measures.
- 11.1.3 The monitoring measures will be drafted once the Plan is published for consultation at the pre-submission stage and it is clear what the significant effects are.
- 11.1.4 Measures will then finalised once the Plan is adopted, and will be set out in an SA Statement in accordance with the SEA Regulations.

11.2 Next Steps

- 11.2.1 This SA Report has been prepared to accompany Regulation 18 version of the Local Plan. The report draws together all the SA outputs that have been prepared to date as well as discussing additional appraisal work that may need to be undertaken at future stages.
- 11.2.2 Following consultation on the draft Plan, the Council will work towards the publication of a plan at 'pre-submission' stage. Further consultation will be undertaken under Regulation 19, but the focus then will be on the soundness of the Plan, rather than the direction it should take and the issues it should focus on.
- 11.2.3 The final Plan will be 'Submitted' for Examination in Public (EiP). The Council will also submit a summary of issues raised (if any) through representations at the Publication stage so that these can be considered by the Government appointed Planning Inspector who will oversee the EiP. At the end of the EiP, the Inspector will judge whether or not the Plan is 'sound'.
- 11.2.4 Further SA work may be required to support the Plan-making process as it moves through Examination (for example the preparation of SA Addendums to deal with changes / modifications).