

# Telford and Wrekin Local Plan

**Integrated Assessment Report  
Addendum:**

**Appraisal of Modifications**

2<sup>nd</sup> June, 2026

## Quality information

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# Non-Technical Summary

## Introduction

AECOM is commissioned to undertake an Integrated Appraisal (IIA) in support of the Telford and Wrekin Local Plan (hereafter referred to as 'the Plan'). IA is a mechanism for considering and communicating the likely effects of the plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives.

This is a Non-Technical Summary (NTS) of this IIA Report Addendum, which is an Addendum to the full IA Report.

The aim of the IIA Report Addendum is essentially to present information on the proposed modifications to the Local Plan following examination, and alternatives where appropriate, with a view to informing the forthcoming consultation and subsequent plan finalisation.

## Scope

The scope of the IIA work, with respect to the Local Plan, is summarised within the IIA Report. Essentially, the scope is reflected in a list of appraisal topics and corresponding objectives, which collectively provide a methodological 'framework' for appraisal. The appraisal topics are listed below.

### IIA Topics

- Biodiversity
- Air quality
- Water quality
- Soil and land
- Landscape
- Historic environment
- Waste
- Climate change adaptation
- Climate change mitigation
- Housing
- Health and wellbeing
- Economy and infrastructure
- Transportation

## Screening of Proposed Modifications

The proposed Main Modifications to the Local Plan have been carefully reviewed to determine whether they could change the conclusions of the earlier Integrated Impact Assessment (IIA). Most of these changes are minor, such as clarifications, updates or corrections, and are not expected to have any meaningful impact on the Plan's overall sustainability performance. However, where changes were identified as having the potential to influence outcomes, they have been considered in more detail through further appraisal.

Overall, the screening shows that the Plan's strategy remains largely unchanged, with only limited adjustments such as a small increase in housing numbers, updates to site allocations and clearer frameworks for key development sites. Some refinements have also been made to policies on biodiversity, climate change and infrastructure, including clearer guidance and stronger mechanisms for delivery and viability. While these changes may result in some trade-offs—for example between development viability and affordable housing provision—they do not fundamentally alter the Plan's direction. The key modifications have therefore been reassessed against the IIA framework, including consideration of alternatives, mitigation and monitoring where appropriate.

## Consideration of alternatives

No further alternatives were identified as being reasonable or needing to be appraised through further IIA work.

Earlier stages of the Local Plan process already tested different options for where development should be located and which sites should be allocated. The current Main Modifications do not change these overall decisions, but instead clarify and refine policies. While some updates relate to topics like biodiversity, affordability and viability, these involve normal trade-offs to improve how policies work in practice and do not represent new strategic choices. Therefore, there is no need to reassess alternatives at this stage.

## Appraisal of Modifications

The appraisal identifies that the Modifications would not lead to significant changes to the appraisal findings (compared to the Publication version of the Plan) when considering the overall effects of the Plan 'as a whole'. However, though the significance of effects remains unchanged for most IIA Objectives, there are some differences between the Submitted Version of the Plan and the version with Modifications that are worth summarising.

The key differences are summarised below:

- Stronger masterplanning and infrastructure requirements improve coordinated, high-quality development outcomes.
- Greater policy flexibility (e.g. biodiversity, energy standards) reduces certainty in achieving higher environmental performance.

- Small increases in housing and site capacity slightly raise development pressures but do not change overall impacts.
- Reduced affordable housing in some areas reflects a trade-off between viability and benefits for lower-income households.
- Clearer transport policies support better impact management and sustainable travel, though congestion may remain.
- Stronger policies on drainage, water efficiency and climate resilience improve environmental performance.

## **Mitigation and enhancement**

None of the modifications are predicted to have significant negative effects, and therefore no mitigation measures have been identified in this respect.

For some topics, the modifications lead to slightly improved outcomes for IIA topics (albeit not to a significant extent). Therefore, the modifications in and of themselves are considered to constitute 'mitigation/enhancement'. No further measures are considered necessary at this stage.

## **Monitoring**

No significant effects have been identified at this stage. Therefore, the monitoring indicators identified in the main IIA Report remain unchanged. A monitoring framework for the Plan has been set out as Appendix L for the Plan. This will be used as a starting point when finalising the indicators in the forthcoming IIA Adoption Statement.

## **Next Steps**

Following consultation, the Inspectors will consider all representations received, before deciding how to report on the Plan's soundness. Assuming that the Inspectors are ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'IIA Statement' will be published that explains the process of plan-making/IIA in full and presents 'measures decided concerning monitoring'.

# 1. Introduction

## 1.1. Background

- 1.1.1 Telford and Wrekin Council is preparing a Local Plan (thereafter referred to as 'the Plan'). The Plan is at an advanced stage, having gone through various rounds of consultation and is currently at public examination.
- 1.1.2 A number of modifications are being proposed to the Plan. It is important to explore whether these changes will affect the integrated impact assessment (IIA) findings. This IIA Addendum should be read in conjunction with the IIA Report (Exam ref: CD06)

## 1.2. Integrated Impact Assessment (IIA)

- 1.2.1 AECOM is commissioned to undertake Integrated Impact Assessment in support of the Plan. IIA is a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. This IIA has been undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004. The IIA also incorporates the requirements of equality impact assessment (EqIA) and health impact assessment (HIA).

## 1.3. Purpose and Structure of this IIA Report Addendum

- 1.3.1 The aim of this IIA Report Addendum is to present information on the proposed main modifications with a view to informing further consultation and subsequent plan finalisation.
- 1.3.2 This report is known as an IIA Report 'Addendum' on the basis that it is an Addendum to the IIA Report published in December 2024 [Exam ref: CD06]. This IIA Report Addendum is structured as follows:
- **Section 2** - presents the scope of the IIA;
  - **Section 3** - explains the method and presents the findings of the screening of proposed modifications;
  - **Section 4** - sets out consideration of alternatives;
  - **Section 5** – sets out an appraisal of the screened in modifications;
  - **Section 6** – considers mitigation and enhancement; and
  - **Section 7** – discusses the next steps.

## 2. What's the scope of the IIA?

### 2.1. The IIA Framework

- 2.1.1 The scope of the IIA work, with respect to the Plan is introduced within the IIA Report and was set out in detail within a scoping report in 2020 (Exam ref: PD14). The scope is reflected in a list of sustainability objectives and supporting criteria, which collectively provide a methodological 'framework' for appraisal. These are grouped by 14 IIA topics.
- 2.1.2 The IIA topics and objectives are listed below in Table 2.1. It has not been necessary to update or revise the IIA framework for the purposes of appraisal work at this stage (given that the key issues remain broadly the same).

**Table 2.1: The IIA Framework**

IIA Topic	Sustainability Objectives
Biodiversity	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.
Air quality	Protect and improve local air quality through implementing measures to reduce air pollution caused by road traffic and other sources in the borough.
Water quality	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	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	Protect and enhance the character of landscapes and townscapes; whilst ensuring their multifunctional use and enjoyment by all.
Historic environment	Protect, maintain and enhance heritage assets (including their setting), cultural heritage and natural history.

IIA Topic	Sustainability Objectives
Waste	Minimise waste generation and support the circular economy by implementing the waste hierarchy.
Climate change adaptation	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	Facilitate and contribute to the move towards a zero carbon Telford and Wrekin whilst improving social equity of access to energy.
Housing	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	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	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	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	Tackle inequalities, ensure that decisions do not disproportionately affect minority populations and that services can be accessed equally by all.

## 3. Screening of Proposed Modifications

### 3.1. Introduction

3.1.1 A number of Main Modifications to the submitted Plan are proposed as a result of the examination hearing sessions and representations received. It is necessary to screen these modifications to determine if they could significantly affect previous IIA findings and if further appraisal work is therefore required.

### 3.2. Method

3.2.1 All of the proposed Main Modifications were screened to determine if further IIA work was required or if they could be 'screened out' from appraisal.

3.2.2 The majority of modifications involve minor edits to the Plan text for clarification or factual correction and have therefore been screened out as not being significant in terms of requiring further exploration through the IIA (i.e. they would be inherently unlikely to give rise to significant effects).

3.2.3 Where modifications are identified as potentially giving rise to significant effects, then additional appraisal work has been undertaken.

### 3.3. Screening Findings

3.3.1 The screening of the proposed Main Modifications found that the majority of modifications would not be likely to have a significant effect on the findings of the previous IIA work presented in the IIA Report. This is because the changes do not fundamentally alter the content of the policies when considering the Plan 'as a whole'. There are also a range of changes proposed to the structure and ordering of the Plan, and though there is substantial rewording of some policies, the substance (of any deleted sections) is picked up in other Plan policies.

3.3.2 When considering the modifications cumulatively, the following changes are considered to be those with the potential to have material impacts on the IIA findings (and are therefore a focus of further exploration through the IIA).

#### **Strategy and allocations**

3.3.3 The spatial strategy is largely unchanged, but there are some small adjustments to the site allocations and composition of the presumed supply as follows:

- An overall increase from 20,200 to 20,680 dwellings.
- Windfall assumption has increased to 120 dwellings per annum.
- 'New' site allocation (HA35 Lawley West – 200 dwellings) – it should be noted that this was a site allocation in the existing Local Plan and therefore considered 'carried forward' in terms of assessment.
- The 'Sustainable Communities' have been formalised as strategic sites each with a clear planning framework.

### **Biodiversity**

3.3.4 Some changes are proposed to biodiversity policies (and requirements within strategic site policies) that are worthy of further consideration:

- Greater clarity about the application of the urban greening factor.
- Clearer off site provision rules for biodiversity net gain and greater alignment with the Local Nature Recovery Strategy.
- More Emphasis on forest community has been added throughout the Plan.

### **Climate change and resource efficiency**

3.3.5 Some changes are proposed to climate change policies that are worthy of further consideration:

- Greater clarity on the content of and procedures relating to sustainability statements for major developments.
- The water efficiency standard requirement has been future proofed by removing specific reference to 110 litres.

### **Infrastructure, Viability & Deliverability**

3.3.6 Several modifications have implications and create trade offs between viability and the achievement of policy requirements.

- Stronger viability review and clawback mechanisms.
- Telford affordable housing requirement reduced (without public subsidy).

3.4.1 Each of the modifications that have been 'screened-in' have been considered in further detail, covering the following elements:

- Consideration of reasonable alternative approaches
- Appraisal against the IIA framework
- Potential for mitigation / enhancement
- Monitoring.

## 4. Consideration of alternatives

### 4.1. Appraising modifications

4.1.1 For the modifications that have been screened-in, the potential for alternative approaches has been considered. This is discussed below.

#### **Modifications relating to spatial strategy and site allocations**

4.1.2 A proportionate and robust approach to the identification and appraisal of reasonable alternatives has already been undertaken throughout plan preparation. In accordance with SEA requirements, the assessment focused on those issues that are central to the Plan, including:

- the strategy for housing growth and distribution,
- the strategy for employment growth,
- the appraisal of broad areas of growth, and
- individual site appraisals.

4.1.3 This process included the systematic development and testing of distinct and realistic spatial strategy options, including different distributions of growth across Telford, Newport and the rural area, as well as alternative growth scenarios. These alternatives were designed to be sufficiently differentiated to enable meaningful comparison, consistent with best practice guidance on sustainability appraisal.

4.1.4 In parallel, the IIA was fully integrated with the Council's site selection methodology, which applied a staged process (including constraints screening, strategic fit, and detailed sustainability appraisal) to identify and refine site allocations. This ensured that alternatives for site allocations were explored iteratively and comprehensively, with the IIA directly informing decisions on preferred options.

4.1.5 The Schedule of Main Modifications confirms that changes introduced at this stage are primarily focused on wording amendments, clarifications, factual corrections and policy refinement, rather than fundamental alterations to the Plan's spatial strategy or the scale and distribution of growth. While some updates are made to policies and supporting text (including housing, climate change and environmental policies), these do not alter the underlying strategic approach, growth strategy, or allocation framework established through earlier stages of plan-making.

4.1.6 Importantly, not all plan components generate reasonable alternatives for assessment, and that emphasis should be placed on the key strategic choices that drive significant effects. The main modifications do not introduce new strategic choices of this nature, nor do they generate new reasonable alternatives that were not previously considered.

4.1.7 As such, revisiting reasonable alternatives at this stage would not be proportionate and is not required to satisfy the SEA Regulations.

4.1.8 Accordingly, it is concluded that the requirement to consider reasonable alternatives has been fully met through earlier stages of plan preparation, and that no further assessment of alternatives is necessary in response to the Main Modifications.

### **Other Modifications**

4.1.9 A number of the Main Modifications relate to thematic and policy refinements—including updates to policies on biodiversity net gain, climate change, affordable housing, infrastructure delivery and viability considerations. These changes are primarily concerned with the detail, effectiveness and deliverability of policy requirements, rather than altering the overarching spatial strategy or the scale and distribution of growth.

4.1.10 As set out in the IIA Report, the appraisal of reasonable alternatives is focused on strategic choices that are likely to give rise to materially different patterns of development or significant environmental, social or economic effects, rather than on procedural or criteria-based policy approaches. The types of refinements introduced through the Main Modifications—such as adjustments to policy thresholds, clarification of requirements, or updates to reflect viability evidence—inevitably involve balancing and trade-offs between policy ambitions (e.g. affordability, infrastructure provision, environmental standards and scheme viability). However, these are inherent to plan-making and development management, and do not represent distinct or reasonable alternatives in the sense required by SEA. Consequently, while such changes may influence how development comes forward at a site level, they do not materially change the strategic framework assessed through the IIA, and therefore do not necessitate further alternatives testing.

## 5. Appraisal of the modifications

### 5.1. Introduction

- 5.1.1 The Main Modifications that are 'screened-in' have been appraised in further detail against the full IIA Framework. The findings are discussed below, first summarising the predicted effects of the Publication version of the Plan and then commenting on the implications that the modifications have in relation to these effects. This helps to provide a context for which the modifications are being appraised within.
- 5.1.2 In some instances, the effects are not predicted to be significantly different as a result of the modifications, but it has been possible to discuss whether the modifications are generally more or less beneficial with regards to a particular IIA topic.
- 5.1.3 Following the discussion of each topic is a table summarising how each 'iteration' of the Plan performs with regards to the IIA topic 'relative to each other'. It could be the case that positive effects are predicted in both iterations, but that it is possible to conclude on the overall rank of preference.
- 5.1.4 The two iterations covered are: the proposed version of the Plan at Publication stage; and the Plan incorporating the main modifications.

### 5.2. IIA Topic 1

#### Summary of effects of the Plan on Biodiversity (Publication version)

- 5.2.1 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 and net gain requirements ought to mitigate adverse effects to an acceptable level and in the longer term provide biodiversity enhancements and gains.
- 5.2.2 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. There is also potential for significant positive effects to be achieved through the creation of new habitats and open space / green infrastructure at the new sustainable communities. If green networks are enhanced at these locations and biodiversity net gain achieved on site (which ought to be possible), there is potential to strengthen connectivity between habitats across the north of Telford.
- 5.2.3 Overall, potential / uncertain **major positive effects** are predicted.

## Implications of modifications

- 5.2.4 The modifications slightly strengthen the strategic direction on biodiversity, particularly through clearer alignment with nature recovery priorities and the Local Nature Recovery Strategy. This should improve how and where biodiversity enhancements are delivered across the borough.
- 5.2.5 However, this is offset by a more flexible approach to delivering improvements in biodiversity beyond the mandatory targets. Biodiversity net gain above 10% is more clearly aspirational now, alongside revised requirements around urban greening, which is likely to lead to more variable outcomes and a lower likelihood of exceeding minimum standards.
- 5.2.6 A number of wider policy changes may also have indirect implications for biodiversity. Strengthened requirements around multifunctional SuDS under Policy CC5 and the role of green space in climate policy (S5) are likely to support incremental biodiversity enhancements. Conversely, increased housing delivery and slightly greater flexibility around tree and woodland loss (NE2) may introduce small additional development pressures. Overall, these effects are secondary and unlikely to significantly alter biodiversity outcomes, even when considered collectively.
- 5.2.7 The more detailed expectations for the Sustainable Communities provide an important counterbalance to the more flexible policy framework. Given their scale and masterplanned nature, these sites are likely to deliver more comprehensive and integrated biodiversity benefits. As such, the Plan becomes more reliant on these strategic allocations to secure meaningful gains, with less consistent delivery expected across smaller or non-strategic development. On balance, the significance of effects are still predicted to be potentially major positive. It is difficult to differentiate the Publication Plan compared with the Modified version of the plan, and so both are ranked on par with one another.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	<u>Potential</u> Major positive	<u>Potential</u> Major positive
<i>Rank</i>	-	-

## 5.3. IIA Topic 2

### Summary of effects of the Plan on Air Quality (Publication version)

- 5.3.1 The Plan is likely to lead to increases in motor vehicle usage across the Borough, especially in areas which are expected to see higher levels or more concentrated housing growth such as Telford, or to a smaller extent Newport.
- 5.3.2 This will be most 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.
- 5.3.3 Effects would be likely to be most pronounced at traffic pinch points and at peak journey times, including in close proximity to larger sites. 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 poorer air quality to some extent.
- 5.3.4 In this sense, more significant effects ought to be avoided, with only **minor negative effects** predicted overall in the longer term.

### Implications of modifications

- 5.3.5 The proposed modifications are not considered likely to materially change the findings of the Regulation 19 Integrated Appraisal in respect of air quality and human health. While there are some small positive changes - most notably clearer policy support for air quality mitigation through Policy CC6 and greater certainty that the Sustainable Communities will come forward on a comprehensive, masterplanned basis - these are not of a scale that would be expected to alter the overall pattern of effects previously identified.
- 5.3.6 The increase in the windfall assumption introduces some limited potential for development to come forward on smaller or less sustainable sites, which could marginally increase reliance on private vehicle. However, this does not represent a change to the spatial strategy or a shift in planned growth to different locations. The effects are therefore negligible.
- 5.3.7 The change from broad locations to formal strategic allocations is not considered to materially alter the minor negative air quality effect identified at Regulation 19, but it does provide greater certainty that the Sustainable Communities will be delivered through a coordinated, masterplanned approach that should help secure the previously assumed benefits relating to permeability, active travel, green infrastructure and reduced reliance on the private car in practice.
- 5.3.8 It is also not possible to conclude with confidence that the modifications make the overall outcome clearly better or worse. The likely effects remain broadly the same overall, and therefore minor negative effects remain an appropriate conclusion following consideration of modifications.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Minor negative	Minor negative
<i>Rank</i>	-	-

## 5.4. IIA Topic 3

### Summary of effects of the Plan on Water Quality (Publication version)

- 5.4.1 The proposed site allocations within the Telford and Wrekin Local Plan have the potential to lead to mixed effects. There are potential negatives coming through the contamination of watercourses and groundwater nearby to abstraction points within close proximity to growth, which may be somewhat heightened by the presence of multiple water-quality related designations in the Borough.
- 5.4.2 Some housing and employment allocations may lead to land with agricultural potential being used for other purposes, hence reducing the potential for agriculture related pollution. Several policies ought to support 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.
- 5.4.3 Overall, **minor positive effects** are predicted in the short, medium and long term.

### Implications of modifications

- 5.4.4 The proposed Main Modifications provide additional clarity and refinement in relation to the Plan's approach to water management, rather than introducing substantive new policy requirements. In particular, modifications relating to water efficiency, protection of water bodies and drainage largely serve to clarify and consolidate expectations already embedded within the Regulation 19 Plan, including the application of sustainable drainage systems, the management of runoff and the efficient use of water resources.
- 5.4.5 While there are modest increases in development quantum and a number of site-specific capacity adjustments, these are limited in scale and do not materially alter the overall spatial strategy or distribution of growth previously assessed through the SA. As such, they are not considered likely to give rise to new or materially different pathways for effects on water quality.
- 5.4.6 The principal implication of the modifications is a modest strengthening in the clarity and consistency of the policy framework, particularly in relation to drainage design, infrastructure capacity and the evidence expected at the planning application stage. However, these changes do not fundamentally alter the nature, magnitude or geographic extent of effects identified in the Regulation 19 IA.

- 5.4.7 On this basis, the findings of the IA in relation to water quality remain valid, with no change in the overall significance of effects reported. The modifications are instead considered to provide a small increase in confidence that the mitigation measures assumed within the assessment will be secured in practice through the development management process.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Minor positive	Minor positive
<i>Rank</i>	2	1

## 5.5. IIA Topic 4

### Summary of effects of the Plan on Soil and Land (Publication version)

- 5.5.1 The Plan seeks to direct development to previously developed land where possible and to avoid the potential sterilization of safeguarded minerals. However, a substantial amount of development is expected to come forward on sites which do not meet these aspirations, and hence negative effects are anticipated, especially in relation to strategic growth at new communities on greenfield land.
- 5.5.2 Overall, it is anticipated that approximately 400 ha of greenfield agricultural land would be affected, and at least 300 ha of this is likely to be best and most versatile land (of which at least 200ha would be Grade 2 land). Whilst DM policies might mitigate this somewhat (in relation to additional growth), major negative effects are anticipated given the substantial loss of greenfield land with value for soil quality and agriculture. Though there are policies in the plan that encourage efficient use of land, this does not offset these negatives.
- 5.5.3 Overall, **major negative effects** are predicted.

### Implications of modifications

- 5.5.4 The proposed Main Modifications do not introduce substantive changes to the Local Plan's overall approach to the protection and management of land and soil resources. The majority of modifications are limited to relatively minor adjustments to development quantum at specific sites and the clarification of existing policy requirements, rather than the allocation of new areas of development on previously untested land or the introduction of significant policy changes in relation to land and soil. As such, the broad pattern of land use change, including the balance between brownfield redevelopment and greenfield release, remains consistent with that assessed at Regulation 19 stage.
- 5.5.5 The modest increases in housing numbers and site capacities may marginally increase the extent of land take and the potential for effects such as soil sealing, loss of agricultural land and disturbance of previously undeveloped soils. However, these changes are limited in scale and are not considered sufficient to give rise to new or materially different effects at the plan level.

- 5.5.6 The regeneration focus of a number of allocations, together with the continued application of previously assessed site selection principles, means that the overall magnitude and distribution of effects remain broadly unchanged.
- 5.5.7 The modifications also include a degree of additional clarity in relation to environmental policy requirements, including those relating to green infrastructure, biodiversity and sustainable design. While these do not introduce new mechanisms for soil protection, they provide a clearer framework for the retention of green infrastructure, the management of land, and the integration of multifunctional spaces within development, which may indirectly support soil functions and reduce the extent of sealing at the site level.
- 5.5.8 Overall, the modifications are not considered to materially alter the nature, magnitude or significance of effects identified in the Regulation 19 IIA in relation to land and soil. The findings of the IIA therefore remain valid, with the principal implication being a limited increase in confidence that mitigation measures assumed within the assessment will be secured through the development management process.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Major negative	Major negative
<i>Rank</i>	-	-

## 5.6. IIA Topic 5

### Summary of effects of the Landscape (Publication version)

- 5.6.1 Overall, the Plan's spatial strategy prioritises development on sites within the built-up area and on sites with lower landscape and visual sensitivities.
- 5.6.2 None of the sites involved are of a high sensitivity and significant growth near to the Shropshire Hills National Landscape is avoided.
- 5.6.3 The scale of growth involved at the new communities to the north of Telford is likely to permanently alter landscape character, but the requirement to delivery green infrastructure should ensure that these are not significantly negative.
- 5.6.4 Negative effects on landscape / visual and settlement character are predicted to arise for some proposed site allocations, such as at the periphery of Telford, Lilleshall and Newport. However, with suitable mitigation through plan policies, the effects are predicted to be minor.
- 5.6.5 In the urban areas of Telford, it is more likely that effects would be neutral or positive, as several of the allocations are on vacant land and / or sites that do not contribute positively towards townscape. Taking into account the Plan policies that promote urban greening and high-quality design, new development ought to be positive in this respect.
- 5.6.6 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, and for smaller settlements that are more sensitive to change. There could also be some **minor positive effects** associated with regeneration of urban sites (mainly within Telford).

### Implications of modifications

- 5.6.7 The proposed Main Modifications do not introduce substantive changes to the overall spatial strategy or the distribution of development in relation to landscape character areas. The majority of modifications relate to relatively minor adjustments to site capacities, the clarification of policy wording, and the formalisation of previously identified strategic allocations, rather than the identification of new development locations that have not already been subject to assessment. . As such, the broad pattern of landscape effects, including the concentration of growth at Telford and the continued role of strategic Sustainable Communities, remains consistent with that assessed at Regulation 19 stage.
- 5.6.8 The modest increases in housing numbers and site capacities may give rise to slight increases in the localised extent of landscape change at specific sites, including the potential for additional encroachment into edge-of-settlement locations and incremental changes to landscape character. However, these changes are limited in scale and do not materially alter the overall magnitude or geographic distribution of effects previously identified.

- 5.6.9 In particular, the key strategic allocations and growth locations, which are the primary drivers of landscape effects, were already appraised and continue to form the basis of the spatial strategy.
- 5.6.10 The modifications also provide additional clarity and, in some cases, strengthening of policy requirements relating to green infrastructure, biodiversity net gain, the Development Greening Factor and masterplanning expectations for strategic sites. While these changes do not fundamentally alter the nature of development proposed, they provide a clearer framework for the integration of landscape-led design principles, green infrastructure networks and structural planting within new development. This may help to moderate localised effects on landscape character and visual amenity at the site level, and improve the consistency with which mitigation measures are secured.
- 5.6.11 Overall, the proposed Main Modifications are not considered to materially alter the nature, magnitude or significance of landscape effects identified in the Regulation 19 IIA. The findings of the IIAA therefore remain valid, with no change to the overall significance of effects reported.
- 5.6.12 While the clarified policy framework may provide a small increase in confidence that mitigation will be delivered effectively, this is not considered sufficient to result in a discernible improvement in landscape outcomes and so both versions of the Plan are ranked on par.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Minor negative Minor positive	Minor negative Minor positive
<i>Rank</i>	-	-

## 5.7. IIA Topic 6

### Summary of effects of the Plan on Historic Environment (Publication version)

- 5.7.1 The spatial strategy directs most of the growth to locations (and site allocations) that are not significantly constrained by heritage designations.
- 5.7.2 Within the Telford urban area, a range of brownfield sites are allocated that are unlikely to negatively affect heritage and could bring some benefits to the built environment where sites lie derelict / vacant. On the edge of Telford and Newport, sites allocated will alter the character of settlement fringes, but the sites involved are not particularly constrained by heritage and any residual effects on natural and built heritage are likely to be neutral or minor.
- 5.7.3 None of the site allocations in the rural area contain designated heritage assets or locally important features, but some are adjacent to conservation areas and / listed buildings. Direct effects on these assets are unlikely to arise, though the scale of growth in these smaller settlements could have some minor negative effects in terms of settlement character.
- 5.7.4 The significance of effects will ultimately be dependent upon 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.
- 5.7.5 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.
- 5.7.6 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, **minor negative effects** are predicted.

### Implications of modifications

- 5.7.7 The proposed Main Modifications do not introduce substantive changes to the overall spatial strategy or distribution of growth in relation to heritage assets and their settings. The majority of modifications relate to relatively limited adjustments to site capacities, clarification of policy wording, and the formalisation of previously identified allocations rather than the introduction of new development locations within areas of previously unassessed heritage sensitivity. As such, the broad pattern of effects on the historic environment remains consistent with those identified at Regulation 19 stage.
- 5.7.8 The modest increases in housing numbers and changes to site capacities may give rise to marginal increases in the extent (or form) of development at certain locations, which could result in slight additional pressures on the setting of nearby heritage assets, particularly at the urban edge or in proximity to rural settlements.

- 5.7.9 However, these changes are relatively small in scale and do not materially alter the nature or extent of potential setting effects previously identified through the IIA.
- 5.7.10 Whilst it is recognised that increased development density can, in some circumstances, intensify effects on the setting of heritage assets—for example through increased built form or reduced site-level openness—the proposed modifications do not alter the extent or location of development, nor the relationship between allocations and heritage receptors. The potential for effects on setting was already identified at Regulation 19 stage and is primarily influenced by the presence and location of development rather than the precise quantum within sites. As such, the density changes do not give rise to materially different or more significant effects, and would remain subject to mitigation through layout, buffering and design secured through the development management process.
- 5.7.11 The Main Modifications also include additional clarity and refinement of policy requirements relating to the historic environment, including stronger and more explicit references to the protection of heritage assets and their settings within design, climate and infrastructure policies. While these changes do not introduce new forms of mitigation, they provide a clearer and more consistent basis for considering heritage impacts at the planning application stage, including the need to assess effects on significance and setting. This may help to ensure that potential adverse effects identified in the IIA are more effectively managed at the site level.
- 5.7.12 Indirectly, the strengthened emphasis on green infrastructure, design quality and masterplanning—particularly for the strategic Sustainable Communities—may assist in managing effects on the setting of heritage assets through the integration of buffering, landscape structuring and sensitive layout. However, these mechanisms were already assumed within the assessments undertaken at Regulation 19 stage and do not represent a fundamental change in approach.
- 5.7.13 The modest increases in site densities do not alter the extent or location of development and therefore do not introduce new or materially different pathways for effects on the historic environment. While higher densities may influence built form and layout at the site level, these are matters of detailed design and are not considered likely to materially affect the setting of heritage assets at the plan scale.
- 5.7.14 Overall, the proposed Main Modifications are not considered to materially alter the nature, magnitude or significance of effects on the historic environment identified in the Regulation 19 IIA. The main implication of the modifications is a small increase in confidence that mitigation and design measures assumed within the assessment will be secured through the development management process. Therefore, minor negative effects remain.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Minor negative	Minor negative
<i>Rank</i>	-	-

## 5.8. IIA Topic 7

### Summary of effects of the Plan on Waste (Publication version)

- 5.8.1 The spatial strategy places most new growth in locations that have good or fair access to a household waste recycling centre (HWRC) and where waste collection should be relatively effective and efficient. In some rural locations accessibility and waste collection could be less efficient, but this only applies to a very small amount of development across the borough.
- 5.8.2 Several plan policies ought to help to ensure that the Borough's waste demands are met and managed efficiently. It should also be recognised that construction waste is likely to be substantial because of strategic growth, though there are policies that seek to promote the effective management of construction and excavation waste as much as possible. On balance, **neutral effects** are predicted.

### Implications of modifications

- 5.8.3 The proposed Main Modifications do not introduce substantive changes to the spatial strategy in relation to waste management outcomes. The Regulation 19 IIA identified that effects are primarily driven by the scale and distribution of development, influencing waste arisings, the efficiency of collection systems, and access to HWRCs. The modifications do not materially alter these conclusions.
- 5.8.4 The modest increase in housing provision and minor adjustments to site capacities may lead to a small corresponding increase in total waste arisings over the plan period. However, these changes are limited in scale and are not considered sufficient to materially affect the capacity or performance of existing waste collection systems beyond that already assumed in the Regulation 19 appraisal. The spatial distribution of growth remains largely unchanged, meaning that development continues to be directed predominantly to areas with established waste collection infrastructure, where services can be expanded incrementally as required.
- 5.8.5 In terms of accessibility to HWRCs, the modifications do not alter the geographic distribution of allocations and therefore do not change the conclusions reached at Regulation 19 stage. This includes the identification of relatively good access within the Telford urban area, more variable access across the urban fringe and new communities, and comparatively poorer access in Newport and rural areas. As such, the pattern of neutral effects in most locations, alongside negligible negative effects in areas with lower accessibility, remains valid.
- 5.8.6 The Main Modifications also include a degree of clarification and refinement to policy wording, including in relation to waste management facilities, development design, and the management of construction waste. Whilst these changes do not introduce new policy mechanisms, they support a more consistent application of existing requirements, including the provision of adequate waste storage, the promotion of recycling and reuse, and the management of construction and excavation waste.

- 5.8.7 This is consistent with the Regulation 19 findings, which emphasised the role of development management policies in mitigating effects.
- 5.8.8 Indirectly, the continued emphasis on high-quality design, sustainable construction and efficient use of resources may support more effective waste minimisation at the site level. However, these do not represent a fundamental change in approach.
- 5.8.9 Overall, the proposed Main Modifications are not considered to materially alter the nature, magnitude or geographic distribution of effects on waste management identified in the Regulation 19 IIA. Therefore, neutral effects remain and both 'versions' of the Plan are ranked on par.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Neutral	Neutral
<i>Rank</i>	-	-

## 5.9. IIA Topic 8

### Summary of effects of the Plan on Climate Change Adaptation (Publication version)

- 5.9.1 In terms of fluvial flood risk, the spatial strategy mostly avoids areas which are identified as at heightened risk (flood zones 2 and 3). Though there are overlaps in the new sustainable communities, it is expected that these would not be built on and effects could be mitigated.
- 5.9.2 Though there are some overlaps with areas at risk of surface water flooding on several proposed site allocations, these are limited in coverage and are mostly for the 1 in 1000 events. There ought to be capacity to avoid building on the more sensitive parts of all the allocated sites, whilst securing appropriate drainage strategies to mitigate risks. Surface water flooding is a more prominent issue at several employment sites at Newport, but these are less sensitive uses compared to housing.
- 5.9.3 Regardless of current flood risk, where development occurs on greenfield land, an associated increase in runoff rates / reduction in infiltration is likely to be seen, with more profound effects on and around larger greenfield sites.
- 5.9.4 In this sense, the north of Telford is likely to be more affected. The Plan seeks to ensure that future development does not increase flood risk on or off sites and that developments are better prepared to handle extreme heat or cold weather events.
- 5.9.5 The Plan supports the protection and enhancement of green infrastructure and multi-functional environments. Such policy measures should help to ensure that significant negative effects do not arise as a result of planned growth. However, it would be beneficial to clarify the approaches that will be expected at the sustainable communities (given that these involve substantial land use changes).

- 5.9.6 Overall, 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 that prioritises natural solutions to water management.
- 5.9.7 However, in the absence of detailed policy clauses relating to the new sustainable communities, it is also possible that strategic growth may not fully realise opportunities for climate change resilience, leaving **neutral** or potentially **minor negative effects**.

### Implications of modifications

- 5.9.8 The Main Modifications do not materially alter the overall climate change resilience effects identified in the IIA. The spatial strategy continues to largely avoid areas of highest fluvial flood risk, although substantial greenfield development — particularly through the Sustainable Communities — retains the potential to affect surface water runoff, permeability and drainage patterns.
- 5.9.9 The modest increase in the housing requirement marginally increases the scale of development, but does not change the nature or distribution of climate resilience effects. Similarly, the increased windfall allowance introduces some additional uncertainty, but this is limited and would be managed through the Plan's development management policies.
- 5.9.10 The most relevant modifications are those which strengthen policy requirements for climate adaptation, Sustainability Statements, flood risk management, SuDS, water efficiency, infrastructure delivery and the masterplanning of strategic sites. These changes respond positively to the IIA's previous findings, particularly the recommendation that expectations for the Sustainable Communities should be made clearer.
- 5.9.11 Overall, the modifications improve the certainty that mitigation measures assumed in the IIA will be delivered in practice. They do not eliminate the need for careful site-level design and flood risk assessment, particularly at large greenfield sites, but they reduce uncertainty and strengthen the Plan's resilience framework. The significance of effects therefore remains broadly as previously assessed, with a slightly stronger basis for concluding that adverse effects can be avoided through policy implementation and detailed masterplanning. Therefore, overall, a neutral effect can be concluded with greater confidence at this stage.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Neutral / <u>potential</u> minor negative	Neutral
<i>Rank</i>	2	1

## 5.10. IIA Topic 9

### Summary of effects of the Plan on Climate Change Mitigation (Publication version)

5.10.1 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).

### Implications of modifications

5.10.2 The Main Modifications do not materially alter the climate change mitigation effects identified in the IIA. The spatial strategy remains broadly unchanged, with growth continuing to be focused principally at Telford, supported by the Sustainable Communities, and with more limited growth at Newport and within the rural area. The updated housing requirement and employment land requirement refine the overall scale of planned growth, but do not introduce a fundamentally different pattern of development or a materially different emissions profile. The Plan will therefore continue to give rise to additional emissions associated with construction activity, embodied carbon, building energy use and transport movements.

5.10.3 The proposed modifications are most relevant to the clarity, consistency and implementation of mitigation measures, rather than to the overall nature of the effects. The submitted Plan already included a climate change policy framework addressing Sustainability Statements, sustainable construction, renewable energy, sustainable travel, electric vehicle infrastructure and green infrastructure. The modifications therefore do not introduce an entirely new approach to climate change mitigation, but they do provide some useful clarification around how these requirements are expected to operate in practice.

5.10.4 In particular, the modifications clarify the role and scope of Sustainability Statements. The modified wording more clearly identifies the types of development to which they apply and provides stronger supporting text on the matters they should address, including energy demand, efficient energy supply, renewable energy, greenhouse gas reduction, and heating and cooling. This is likely to improve consistency at the planning application stage and reduce some uncertainty for applicants and decision-makers. However, as the mechanism was already present in the submitted Plan, this should be understood as a refinement and strengthening of implementation rather than a new mitigation measure.

- 5.10.5 The modifications to the sustainable construction and renewable energy policies are more mixed. Policy CC1 continues to support a fabric-first approach, passive design, energy efficiency, low embodied carbon materials, insulation, water recycling, future-proofing for low and zero carbon technologies, and Modern Methods of Construction.
- 5.10.6 However, some wording is made more flexible, including references to measures being applied where 'relevant and practicable'. Similarly, Policy CC2 moves from a more direct requirement for renewable energy production and storage within new development towards a more supportive and feasibility-based approach. This may reduce certainty that all schemes will deliver on-site renewable energy, but provides a more flexible and potentially more deliverable framework when read alongside Policy S5 and national Building Regulations.
- 5.10.7 The modifications also continue to support sustainable travel, active travel, public transport connectivity, Travel Plans, electric vehicle charging, cycle parking and wider green infrastructure. These measures are relevant to reducing transport-related emissions and supporting lower-carbon development patterns. However, they do not materially alter the distribution of growth or remove the likelihood that new development will generate additional travel demand. Their effect is therefore likely to be beneficial in implementation terms, but not sufficient to materially change the overall significance of emissions-related effects identified in the submitted IIA.
- 5.10.8 Similarly, the strengthened references to biodiversity net gain, the Green Network and the Development Greening Factor provide supporting benefits for climate change mitigation through carbon storage, urban cooling and multifunctional landscape design. However, these benefits are likely to be secondary to the emissions associated with buildings, construction and transport.
- 5.10.9 Overall, the modifications provide a minor improvement in clarity and implementation certainty, particularly through the revised wording on Sustainability Statements and the clearer relationship between climate mitigation, design, energy, sustainable travel and green infrastructure policies. However, many of these measures were already included in the submitted Plan, and some policies, notably those relating to sustainable construction and renewable energy, are expressed in more flexible terms than previously.
- 5.10.10 Therefore, the significance of effects remains broadly as previously assessed. The modifications clarify and consolidate existing mitigation requirements and may improve their implementation, but they do not materially alter the scale, location or nature of emissions-related effects arising from planned growth.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Minor positive	Minor positive
<i>Rank</i>	-	-

## 5.11. IIA Topic 10

### Summary of effects of the Plan on Housing (Publication version)

- 5.11.1 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.
- 5.11.2 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.
- 5.11.3 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
- 5.11.4 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.

### Implications of modifications

- 5.11.5 The most significant changes relate to the clarification of the housing requirement and delivery strategy (MM015–MM016). The modifications confirm a requirement of approximately 20,680 dwellings over the period 2021–2041, including a contribution towards unmet Black Country needs, alongside a clearer housing trajectory, supply position and monitoring framework. These provisions do not significantly change the scale of growth previously assessed, but provide greater clarity regarding how housing delivery will be monitored and maintained over the plan period. As such, they improve confidence in deliverability rather than altering the nature or magnitude of effects identified in the Regulation 19 IIA.
- 5.11.6 Further changes relate to the refinement of the Sustainable Communities strategy (MM068–MM070). The modifications introduce more explicit requirements for masterplanning, infrastructure provision, phasing and the integration of services and facilities across the strategic allocations. These elements were reflected in the assumptions underpinning the Regulation 19 appraisal, and therefore the modifications do not introduce new effects as such. However, they strengthen confidence that these sites will be delivered in a comprehensive and coordinated way, supporting both the quantity and quality of housing delivery.
- 5.11.7 Modifications to policies relating to housing mix, quality and accessibility (MM071) provide additional clarity in relation to the range of needs to be

addressed through new development, including provision for specialist and accessible housing.

- 5.11.8 These changes are consistent with the approach previously assessed and are best understood as refinements to policy wording, rather than a substantive change to the Plan's ability to meet housing needs.
- 5.11.9 More notable changes arise from amendments to affordable housing requirements and delivery mechanisms (MM074–MM076). These introduce a more viability-responsive approach, including revised thresholds within the Telford built-up area and clearer review and clawback mechanisms. The reduction in the minimum requirement in this location has the potential to affect the proportion of affordable housing delivered, although this is balanced by the retention of higher requirements elsewhere and strengthened provisions to secure policy compliance over time. The resulting effect is therefore more appropriately characterised as a change in how delivery risks are managed, rather than a clear change in overall outcomes.
- 5.11.10 Overall, the Main Modifications do not materially alter the scale of housing provision or the spatial strategy, and therefore do not change the key pathways through which housing effects were identified in the Regulation 19 IIA. Instead, they provide additional clarity and improve the consistency and robustness of delivery mechanisms, particularly in relation to monitoring, strategic site implementation and viability. While some uncertainty remains in relation to affordable housing delivery, this does not significantly affect the overall conclusion. As such, a significant positive effect remains appropriate, with the modifications providing a slight increase in confidence that housing needs will be met over the plan period.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Major positive	Major positive
<i>Rank</i>	-	-

## 5.12. IIA Topic 11

### **Summary of effects of the Plan on Health and Wellbeing (Publication version)**

- 5.12.1 Overall, the Plan is expected to lead to positive effects, largely related to the ability to concentrate significant amounts of new housing growth in Telford and its periphery. This would bring forward locations that are broadly accessible to health, education and open, green and natural spaces and facilities.
- 5.12.2 There are adjacent communities at the Telford periphery, some of which are experiencing higher levels of deprivation, and therefore, a coordinated approach to growth could lead to spillover benefits to these areas (for example access to new services, higher quality housing and improved open space).
- 5.12.3 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 Borough's stock of green and natural spaces.

- 5.12.4 The Plan also provides land to support employment growth, which is another key determinant of health. The allocated sites are broadly accessible to a range of communities by sustainable modes of travel, though some sites may be more difficult to access without a private car.
- 5.12.5 Overall, the Plan is expected to boost mental and physical health outcomes. **Major positive effects** are predicted. Health inequalities are likely to reduce for some communities, but it is possible that other communities (that are not a focus of planned growth) could remain static in this respect. In particular, communities to the south of Telford warrant attention to ensure that the benefits of housing and employment growth across the borough are extended to these locations where possible.

### Implications of modifications

- 5.12.6 The modifications provide greater clarity around how the positive effects of the Plan, particularly in relation to the Sustainable Communities, will be delivered. Revised wording for these sites introduces more explicit requirements for Design Briefs, Masterplans, phasing and infrastructure delivery, including provision for schools, local centres, green infrastructure, open space, recreation and sustainable travel connections. These elements were already assumed within the Regulation 19 appraisal, and therefore the modifications do not alter the nature of the effects identified. However, they improve confidence that strategic growth will be delivered in a comprehensive and coordinated manner, supported by the infrastructure necessary to create accessible and well-functioning places.
- 5.12.7 Further modifications reinforce existing policy support for healthy lifestyles, inclusive design and access to services and green space. Amendments to Policies S6, HO3, DD1, ST1 and CI3 provide useful clarification relating to health and wellbeing, housing quality, design and community infrastructure in areas such as accessible and adaptable homes, private amenity space, recreation provision and walking and cycling connectivity. These changes are consistent with the approach previously assessed and are best understood as refinements which improve clarity and deliverability, rather than introducing a materially different policy framework.
- 5.12.8 The most substantive change relates to affordable housing provision. The reduction in the minimum requirement within the Telford built-up area from 25% to 20% could reduce the proportion of affordable homes delivered in this location, which has potential implications for housing affordability and associated health outcomes. However, this needs to be considered alongside the retention of higher requirements in Newport and the rural area, and the introduction of clearer viability, review and clawback mechanisms (which will aid in overall delivery rates). Taken together, the effect is more appropriately characterised as a rebalancing of delivery considerations rather than a change in outcomes.

5.12.9 Overall, the Main Modifications do not materially change the spatial strategy or the key mechanisms through which health and wellbeing effects were identified in the Regulation 19 IIA.

5.12.10 Instead, they provide additional clarity and improve the certainty and consistency of implementation, particularly in relation to the comprehensive delivery of strategic sites, provision of supporting infrastructure and design quality. As such, the overall conclusion remains unchanged, with major positive effects relating to health, wellbeing and quality of life expected to arise.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Major positive	Major positive
<i>Rank</i>	-	-

## 5.13. IIA Topic 12

### Summary of effects of the Plan on Economy and Infrastructure (Publication version)

- 5.13.1 Overall, the spatial strategy will lead to positive effects, with particular benefits felt in Telford and Newport, which are the focus for employment growth. These effects are expected to be related to increased local GVA, suitable housing in accessible locations to employment sites, increased local employment provision, skills development, increased footfall in shops and local/district centres. Opportunities for jobs should be accessible to residents across the borough, including good access via sustainable modes of transport for some of the most deprived communities in the borough.
- 5.13.2 A range of policies in the Plan provide further support for development which boosts economic growth, infrastructure delivery and skills development.
- 5.13.3 There are also policies in place that seek to ensure that transport networks and other infrastructure is sufficient to accommodate sustainable economic growth.
- 5.13.4 Finally, the Plan seeks to create attractive environments and deliver high quality housing, which should help with the retention and attraction of a skilled workforce to support economic opportunities.
- 5.13.5 Overall, **major positive effects** are predicted.

### Implications of modifications

- 5.13.6 The modifications provide additional clarity around the scale and composition of employment land delivery. The Plan now refers to a minimum of 168ha of employment land over the plan period, supported by completions, commitments, allocated employment sites and land within the Sustainable Communities. The role of Strategic Employment Areas, including Halesfield, Stafford Park, Hortonwood/MOD Donnington and Donnington Wood, is also clarified as key locations for employment development. These changes improve clarity and certainty in how employment land supply will be delivered, but they do not materially alter the overall employment strategy previously assessed.
- 5.13.7 The Sustainable Communities continue to underpin the economic and employment conclusions. The modifications provide greater clarity that these sites will deliver employment land alongside housing, local centres, schools, green infrastructure and sustainable transport connections, supported by comprehensive masterplanning. This is consistent with the assumptions made in the Regulation 19 IIA that growth in accessible locations would support access to employment and help retain and attract a skilled workforce. As these sites and principles were already embedded in the submitted Plan, the effect of the modifications is to increase confidence in delivery rather than to change the nature or magnitude of effects.
- 5.13.8 The modifications also introduce clearer safeguards for Strategic Employment Areas and existing employment land. This includes more explicit criteria for development within these areas, and requirements for evidence where the loss of employment land is proposed.

- 5.13.9 These changes support the continued role and function of established employment locations, and are likely to reinforce the effectiveness of policies already assessed, rather than introduce new effects.
- 5.13.10 Additional support is provided for rural economic development, including reference to diversification, tourism, local services and small-scale infrastructure. While these changes are positive in supporting the rural economy, their effects are likely to be relatively localised and minor in scale compared to the main employment areas within Telford and Newport, and therefore do not alter the overall appraisal findings.
- 5.13.11 Similarly, modifications to town centre policies continue to support the vitality and viability of Telford Town Centre and other centres, alongside requirements to manage out-of-centre development through sequential and impact testing. These provisions align with the existing strategy and do not represent a substantive change to the economic role of centres as previously assessed.
- 5.13.12 Overall, the Main Modifications do not materially change the spatial strategy or the key pathways through which economic and employment effects were identified at Regulation 19. Instead, they provide additional clarity and improve the consistency and deliverability of the policy framework, particularly in relation to employment land provision, the protection of Strategic Employment Areas and the comprehensive delivery of mixed-use strategic sites.
- 5.13.13 As such, no change to the overall appraisal conclusion is required. Significant positive effects associated with employment generation, economic growth and investment remain likely, with the modifications providing a modest increase in confidence that these effects will be realised in practice.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Major positive	Major positive
<i>Rank</i>	-	-

## 5.14. IIA Topic 13

### Summary of effects of the Plan on Transportation (Publication version)

- 5.14.1 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.
- 5.14.2 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 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 in full.

- 5.14.3 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.

### **Implications of modifications**

- 5.14.4 The Main Modifications do not materially alter the scale or broad distribution of development. Growth remains focused within the Telford urban area, with the strategic allocations continuing to represent the principal locations for change. As such, the overall pattern of effects identified at Regulation 19 remains appropriate. The role of the Main Modifications is primarily to refine the effectiveness of the policy framework, rather than to introduce new transport outcomes.
- 5.14.5 The most relevant changes relate to the strengthening of requirements around the assessment and mitigation of transport impacts, and the clearer articulation of expectations for sustainable travel. In particular, modifications to the transport policies introduce more explicit requirements for assessing cumulative impacts on the highway network, supported by the use of strategic modelling, alongside clearer expectations for the preparation of Transport Assessments, Travel Plans and the securing of mitigation through developer contributions. These changes improve the consistency and robustness of the approach to managing the impacts of development on the transport network, rather than altering the nature of those impacts.
- 5.14.6 More limited but still relevant changes arise from modifications to the strategic site policies, where additional emphasis is placed on the comprehensive planning of large-scale developments. This includes clearer expectations around internal connectivity, the integration of walking and cycling routes, and the provision of public transport infrastructure within new communities. Taken together, these changes increase the likelihood that strategic sites will function as relatively self-contained and accessible places, thereby supporting shorter trips and greater use of non-car modes.
- 5.14.7 Modifications to infrastructure delivery policy also reinforce the expectation that development will contribute to the provision of necessary infrastructure, including transport mitigation, and that this will be delivered alongside development. While this does not fundamentally change the conclusions of the Regulation 19 IIA, it strengthens confidence that the mitigation measures assumed within the appraisal will be secured in practice.
- 5.14.8 In terms of effects, these changes are likely to reinforce the moderate positive effects previously identified in relation to sustainable travel and accessibility.
- 5.14.9 The clearer requirements around sustainable transport provision and site planning increase the likelihood that new development will support walking, cycling and public transport, and that opportunities to reduce the need to travel will be realised, particularly within the larger allocations.

- 5.14.10 At the same time, the underlying drivers of negative effects remain unchanged. The planned scale of development will continue to generate additional travel demand, and increases in traffic and congestion are still expected in certain locations, particularly along key routes and within areas experiencing higher levels of growth. While the strengthened policy framework should improve the mitigation of these impacts, it is not sufficient to avoid them entirely.
- 5.14.11 Overall, the Main Modifications do not materially change the nature or magnitude of the effects identified in the Regulation 19 IIA. Instead, they provide a more effective and deliverable framework for managing transport impacts and promoting sustainable travel. This results in a modest strengthening of the certainty of positive effects, and a slight reduction in the likelihood or severity of negative effects, but the overall conclusion of moderate positive and minor negative effects remains unchanged.

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Moderate positive Minor negative	Moderate positive Minor negative
<i>Rank</i>	2	1

## 5.15. IIA Topic 14

### **Summary of effects of the Plan on Equality and Diversity (Publication version)**

- 5.15.1 The distribution of growth is likely to have mixed effects with regards to equality and communities. The focus on Telford for the majority of growth helps to direct new housing and associated infrastructure to the key town in the Borough, which is where inequalities are more prominent. Urban regeneration in the centre, coupled with improvements to transport networks is likely to benefit all communities within the urban area, whilst the new sustainable communities will bring significant benefits to people who decide to move to those areas. With regards to existing communities, there are pockets of deprivation and BAME communities to the north of Telford which could benefit from new social facilities, jobs, services and environmental improvements at the new sustainable communities. However, some of the most deprived communities to the south of Telford are less likely to benefit from planned developments. This is due to the levels of growth that have already taken place in south Telford.
- 5.15.2 Growth in Newport and the rural areas is fairly low and is unlikely to have significant effects in terms of equalities and communities. The main benefit is support for affordable housing and the local services present in the smaller settlements. Car reliance is likely to continue for rural communities though, and there may continue to be some access to service barriers (more likely to affect elderly people).
- 5.15.3 Aside from the spatial approach, a range of policies in the Plan 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.

- 5.15.4 There is a focus on improving accessibility for all people, considering multigeneration needs in new developments and achieving an acceptable standard of living for all people.
- 5.15.5 Overall, there are likely to be positive outcomes for a range of communities and groups with protected characteristics. The Plan is also likely to support community cohesion. However, some communities to the South of Telford could continue to experience high levels of deprivation unless there is targeted intervention to help improve the wider determinants of health. This is could be through funding initiatives such as Pride in Place.
- 5.15.6 This limits the significance of the positive effects that are likely to arise, and therefore only **minor positive effects** are predicted.

### **Implications of modifications**

- 5.15.7 The Main Modifications do not materially alter the spatial strategy or distribution of growth and therefore do not change the underlying patterns through which equality and diversity effects were identified. Development remains primarily focused within the Telford urban area, with strategic allocations continuing to represent the main locations for new housing, employment and infrastructure. As such, the broad spatial dynamics identified previously, including the concentration of benefits within certain parts of the borough and more limited effects elsewhere, remain applicable.
- 5.15.8 The most relevant changes relate to additional clarity within policies concerning inclusive design, accessibility and the provision of housing to meet a wide range of needs. Modifications to policies on housing mix and quality introduce more explicit references to the requirement for development to respond to different groups within the community, including older people, people with disabilities and those requiring specialist or adaptable accommodation. These provisions are consistent with the approach assessed at Regulation 19 and do not alter the nature of the effects identified. However, they improve confidence that inclusive design principles will be more consistently embedded in new development.
- 5.15.9 Similarly, amendments to policies relating to health, wellbeing and design provide additional clarity in relation to the creation of accessible environments. This includes more explicit reference to inclusive design considerations, such as ease of movement, legibility and, in particular, dementia-friendly environments. These changes support the delivery of places that are more usable for all members of the community, including those with cognitive or mobility impairments, and reinforce the positive effects previously identified in relation to reducing barriers to access and supporting independent living.
- 5.15.10 The Sustainable Communities continue to play a central role in delivering equality and diversity outcomes. The Main Modifications introduce clearer requirements for comprehensive masterplanning, including provision of local centres, schools, open space and sustainable transport connections.
- 5.15.11 These elements were reflected in the assumptions underpinning the Regulation 19 appraisal, particularly in relation to the potential for large-scale developments to deliver well-served and accessible communities.

- 5.15.12 The modifications therefore do not introduce new effects but improve confidence that these outcomes will be realised in practice. In doing so, they support the potential for new development to contribute to improved access to services, employment and community infrastructure for a wide range of groups, including those without access to a private vehicle.
- 5.15.13 As identified previously, the benefits associated with these strategic sites are likely to be unevenly distributed. While communities in the north of Telford may benefit from proximity to new development, infrastructure and employment opportunities, communities in the south of Telford are less directly connected to the main locations for growth. The Main Modifications do not alter this spatial relationship and therefore do not address the potential for some existing communities to experience comparatively fewer benefits. This is due to the existing and previous levels of growth in those areas such as Lightmoor and Lawley. However, While the spatial distribution of growth means that not all areas will benefit directly from new development, the Plan includes a range of mechanisms through which wider benefits are expected to be realised, including infrastructure investment, improved connectivity and regeneration support. These measures represent a proportionate response within the scope of plan-making.
- 5.15.14 The most substantive change relevant to equality relates to affordable housing provision. The reduction in the minimum requirement within the Telford built-up area has the potential to affect the proportion of affordable homes delivered in this location, which may have implications for lower-income households and those experiencing barriers to accessing suitable accommodation. However, this is balanced by the retention of higher requirements in other parts of the borough and the introduction of clearer viability, review and clawback mechanisms. As with the housing and health assessments, this change is more appropriately characterised as an adjustment to delivery mechanisms rather than a clear change in overall outcomes.
- 5.15.15 Overall, the Main Modifications do not materially change the conclusions of the Regulation 19 IIA in relation to equality and diversity. They provide additional clarity and improve the consistency and deliverability of policies which support inclusive communities, accessible environments and a diverse housing offer. While the distribution of benefits remains uneven and some communities may continue to experience relative disadvantage, this position is unchanged from that previously assessed. It is recognised that those communities have benefitted from existing and previous rounds of growth. As such, minor positive effects remain appropriate overall, with the modifications providing a modest increase in confidence that inclusive outcomes will be secured through the implementation of the Plan. Counterbalancing this, is the lower level of affordable housing that may be seen in Telford (where much of the deprivation exists).

	<b>Publication Plan</b>	<b>Plan with modifications</b>
<i>Effects</i>	Minor positive	Minor positive
<i>Rank</i>	-	-

## 5.16. Summary of Effects

5.16.1 The previous sections discuss how the modifications are likely to affect each of the IIA Topics. Whilst several implications have been identified (mainly positive), these do not change the significance of the effects when compared to the Publication version of the Plan (though water quality sees greater certainty that the impacts would be neutral rather than negative).

5.16.2 These outcomes are reflected in Table 5.1 below, which shows the effects of the Publication version of the Plan, summary of the implications of the Modifications, and finally the 'residual' effects of the modified version of the Plan. The key differences in effects are as follows:

- Stronger and more explicit masterplanning and infrastructure requirements for Sustainable Communities enhance the likelihood of delivering coordinated, high-quality development with integrated services, transport and green infrastructure (With benefits for Health and Wellbeing, Transportation, Biodiversity, Climate change Adaptation, Economy and Infrastructure).
- Increased flexibility in key policy areas, including biodiversity net gain above 10%, renewable energy and sustainable construction, introduces greater variability in outcomes and reduces certainty that higher environmental standards will always be achieved (Biodiversity, Climate Change Mitigation).
- Modest increases in housing provision, site capacities and windfall assumptions slightly raise development pressures (e.g. on transport, land and air quality) but are not sufficient to materially change overall sustainability effects.
- Changes to affordable housing requirements, particularly a reduction in Telford, create a trade-off between improving viability/delivery and potentially reducing benefits for lower-income households, affecting housing, equality and health outcomes (Housing, Equality and Diversity, Health and Wellbeing).
- Strengthened transport policy requirements, including clearer expectations for assessments, mitigation and sustainable travel, support improved management of transport impacts and greater potential for modal shift, although congestion effects remain (Transportation, Air Quality, Climate Change Mitigation).
- Enhanced emphasis on sustainable drainage, water efficiency and climate resilience strengthens the implementation of measures supporting water quality and climate adaptation (Water Quality, Climate Change Adaptation, Biodiversity).

**Table 5.1: Summary of IIA findings**

<b>IIA Topic</b>	<b>Effects of Publication Plan</b>	<b>Implications of the modifications</b>	<b>Effects taking account of modifications</b>
Biodiversity	<i>Uncertain Major +ve</i>	Mixed implications	<i>Uncertain Major +ve</i>
Air quality	Minor -ve	Broadly neutral	Minor -ve
Water quality	Minor +ve	Broadly positive	Minor +ve
Soil and land	Major -ve	Broadly neutral	Major -ve
Landscape	Minor -ve Minor +ve	Broadly neutral	Minor -ve Minor +ve
Historic environment	Minor -ve	Broadly neutral	Minor -ve
Waste	Minor +ve	Broadly neutral	Minor +ve
Climate change adaptation	Neutral / minor -ve	Broadly positive	Neutral
Climate change mitigation	Minor +ve	Mixed implications	Minor +ve
Housing	Major +ve	Mixed implications	Major +ve
Health and wellbeing	Major +ve	Broadly positive	Major +ve
Economy and infrastructure	Major +ve	Broadly positive	Major +ve
Transportation	Moderate +ve Minor -ve	Mixed implications	Moderate +ve Minor -ve
Equality and Diversity	Minor +ve	Mixed implications	Minor +ve

## 5.17. Ranking

5.17.1 Though the significance of effects has remained the same for all of the IIA Topics, it has been possible to comment on whether the modifications contribute more or less positively toward the objective. This allows the two versions of the plan to be compared and relatively ranked. For most of the IIA topics, there has been limited change, and the different plan versions are ranked on par with each other (represented by the - symbol in table 5.2 below).

5.17.2 The modifications serve to improve the performance against several IIA topics relatively speaking including 'Economy and infrastructure', 'Water quality', 'Climate change adaptation', 'Health and Wellbeing'.

**Table 5.2: Rank of performance**

IIA Objective	Publication Plan	Plan with modifications
Biodiversity	-	-
Air quality	-	-
Water quality	2	1
Soil and land	-	-
Landscape	-	-
Historic environment	-	-
Waste	-	-
Climate change adaptation	2	1
Climate change mitigation	-	-
Housing	-	-
Health and wellbeing	2	1
Economy and infrastructure	2	1
Transportation	-	-
Equality and Diversity	-	-

**Box 1: A note on HRA****HRA implications**

The Main Modifications were scrutinised to determine whether they would change the conclusion of the Publication Local Plan HRA that no adverse effects would arise on the integrity of European sites. It is concluded that the Main Modifications do not alter the conclusions of the HRA. While the quantum of housing has changed, this is only a slight increase, it is not the result of changes in allocated sites, but is due to an increased windfall assumption, and some changes to assumed supply from the committed sites.

The submission HRA concluded that the strategic water resource planning by Severn Trent Water, the commitment in Policy CC4 that would make it more feasible for Severn Trent to reduce reliance on groundwater abstraction during periods of high demand and/or low flow, and Policy CC5, which details the need for SUDS, no adverse effect on the integrity of Midlands Meres & Mosses Phase 2 Ramsar site would arise. This remains the case.

No other modifications are likely to have a substantial impact upon the HRA findings either.

## 6. Mitigation and enhancement

- 6.1.1 None of the modifications are predicted to have significant negative effects, and therefore no mitigation measures have been identified in this respect.
- 6.1.2 For some topics, the modifications lead to slightly improved outcomes for IIA topics (albeit not to a significant extent). Therefore, the modifications are considered to constitute 'mitigation/enhancements'. No further measures are considered necessary at this stage.

## 7. Next steps

### 7.1. Monitoring

- 7.1.1 The IIA Report [Exam ref:CD06] submitted alongside the Local Plan presented a range of 'measures envisaged concerning monitoring'.
- 7.1.2 The modifications are not likely to lead to significant changes to the IIA findings, and therefore, it is considered unnecessary to identify further monitoring measures to address significant effects.
- 7.1.3 A final list of monitoring measures will be presented within the IIA Statement produced once the Local Plan is adopted. This could include updates to reflect any changes to the Council's proposed monitoring framework for the Plan.

### 7.2. Plan Finalisation

- 7.2.1 Following consultation on the modifications and supporting evidence (including this IIA Addendum), the Inspectors will consider all representations received, before deciding how to report on the Plan's soundness.
- 7.2.2 Assuming that the Inspectors are ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'IIA Statement' will be published that explains the process of plan-making/IIA in full and presents 'measures decided concerning monitoring'.

the 1990s, the incidence of dengue fever has increased in many tropical and subtropical regions, including Hong Kong [1].

There are four species of dengue virus (DENV) that cause dengue fever: DENV-1, DENV-2, DENV-3 and DENV-4. DENV-2 is the most common and is responsible for the majority of dengue fever cases. DENV-1, DENV-3 and DENV-4 are less common and are responsible for a smaller proportion of cases. DENV-1 and DENV-3 are found in the Americas, the Caribbean, and the Pacific Islands. DENV-4 is found in Africa, Asia, and the Pacific Islands. DENV-2 is found in all of these regions.

Dengue fever is a mosquito-borne viral infection. The mosquito *Aedes albopictus* is the primary vector of DENV. The mosquito feeds on humans and other animals, and it is responsible for the transmission of the virus. Dengue fever is most common in tropical and subtropical regions, but it has recently spread to temperate regions, including Hong Kong.

In Hong Kong, dengue fever was first reported in 1968. Since then, there have been several outbreaks, with the most recent occurring in 2000. The 2000 outbreak was caused by DENV-2 and resulted in over 100 cases. The outbreak was unusual because it occurred in a temperate region and was caused by a virus that is normally found in tropical and subtropical regions.

The 2000 outbreak in Hong Kong was caused by DENV-2, which is the most common species of dengue virus. DENV-2 is responsible for the majority of dengue fever cases in tropical and subtropical regions. DENV-2 is also the most common species of dengue virus found in Hong Kong.

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