

Telford and Wrekin Main Modifications to the Publication Version of the Local Plan
Public consultation 8th June to 5pm Monday 20th July

Physical consultation response form

Please use this form if you wish to comment on the Telford and Wrekin Main Modifications to the Publication Version of the Local Plan. Further information can be found on the Councils website at www.telfordandwrekinlocalplan.co.uk

This form may be scanned or returned via e-mail to: LocalPlan@telford.gov.uk

Alternatively, forms can be posted to; Strategic Planning Team, Telford & Wrekin Council, Southwater One, TF2 2FH

How we will use your information

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Personal Details

Title	Mr
First Name	Michael
Last Name	Burrow
Address	
Commenting on behalf of (if relevant)	Redrow
Organisation (if relevant)	Savills (UK) Limited
Telephone	
Email	

NOTE: The questions below are numbered 1 to 7. Please attach any typed or written responses related to the questions below when submitting this form.

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Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM013 and MM014

Q2: Do you consider that this Main Modification is:

☐ Legally compliant

☒ Sound

☐ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

The proposed MM013 addition of cross-referencing within Part B of Policy S3 to the full list of allocated employment sites in Appendix B, in addition to the inclusion of allocation reference numbers on the Policies Map, is considered to be required to ensure the effectiveness of this Policy.

Furthermore the new supporting text which is proposed at MM014 for insertion after para 3.34, to explain that the strategic approach to economic development seeks to ensure the provision of an appropriately diverse portfolio of employment land and buildings in order to provide choice and flexibility to inward investors, is considered to be required in order to justify the Council's decision to plan for the quantum of employment land identified in the evidence base and, in particular, plan for the delivery of more employment land on the edge of Newport than the minimum figure quoted in the Newport Employment Land Needs Study evidence base document.



Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

You will need to say why the change(s) will make the Main Modification legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A



Q5: Do you have any comments on the Integrated Assessment Report Addendum, in respect to this particular Main Modification? Please provide them in the box below:

No



Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

The proposed inclusion of allocation reference numbers on the Policies Map is considered to be required to ensure the effectiveness of Policy S3.

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Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM015

Q2: Do you consider that this Main Modification is:

☐ Legally compliant

☐ Sound

☒ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

The amendment proposed to Part 2 of Policy S4 in MM015, to clarify how that the contribution of 153 dwellings per annum for meeting the Black Country needs is part of the overall 1,034 dwelling per annum requirement, is helpful. However it is considered that this Main Modification does not go far enough and still does not acknowledge the scale of the cross-boundary housing shortfall.

In proposing this contribution the Council is acknowledging the requirement in paragraph 62 of the December 2024 NPPF to take unmet needs from neighbouring areas into account in establishing the amount of housing that it is planning for. However it is considered that sufficient justification has still not been provided to explain why the contribution has been capped at 153 dwellings per annum given the significant residual unmet housing need from both the Black Country and the wider Greater Birmingham and Black Country HMA to be met on land which is outside of the Green Belt within the Telford and Wrekin council administrative boundary.

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It is noted that the Council's review of migration patterns has drawn upon ONS internal migration data at local authority level (mid-2022 estimates), which assesses flows between Telford & Wrekin and the Black Country Authorities and, through translating household migration into a dwelling equivalent figure, indicated a contribution of around 126 dwellings per annum, which the Council has chosen to exceed.

In order to provide more sound justification for the approach taken it is considered that the Council should instead consider planning for an additional quantum of cross-boundary development which is more proportionate to the overall quantum of unmet need rather than based on uplifted ONS migration figures.



Q5: Do you have any comments on the Integrated Assessment Report Addendum, in respect to this particular Main Modification? Please provide them in the box below:

No



Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

No

Q7: Do you have any comments on one of the Councils Additional Modifications? Please provide them in the box below:

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Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM017 and MM018

Q2: Do you consider that this Main Modification is:

☐ Legally compliant

☒ Sound

☐ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

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The proposed MM017 amendment in to Part 1 of Policy S5, to clarify that the Council is setting local ambitions and not local targets, along with the amendment proposed to Part 4 of Policy S5 to clarify that developments should contribute to, rather than achieve, net zero are considered to be necessary in order to avoid the policy wording introducing local efficiency standards which exceed current national standards.

Local efficiency standards above national Building Regulations should only be imposed where robust costed evidence has been provided. Such evidence has not been provided in this instance and therefore the relevant national standards remain the Building Regulations. Furthermore the proposed amendments to the supporting text to Policy S5 at MM018 to make it explicit that Sustainability Statements should be focusing on the minimum requirements set in Building Regulations (including those which relates to the Future Homes Standard), are therefore welcomed to ensure that this Policy is both effective and appropriately justified.

Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

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Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM021

Q2: Do you consider that this Main Modification is:

☐ Legally compliant

☐ Sound

☒ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

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The amendment proposed to Part 4 of Policy S7 in MM021, to clarify when and how a viability review would take place for major developments, would improve the effectiveness of this Policy requirement.

However the amendment made does not go far enough. The Policy wording still only has an 'upward only' focus and does not recognise that this subsequent viability appraisal may highlight a further deterioration in viability, for which the Policy wording currently does not include any specific recourse action for the Council to rectify this through a commensurate repayment of planning obligations. In this regard it is considered that the wording of Policy S7 is still not sufficiently effective.

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In order to overcome the soundness concerns highlighted in Q3 it is considered that the wording of Part 4 of Policy S7 should be further amended as follows [amended text in **bold**] to ensure that the viability review is fairly and equitably applied:

4. For major developments (10 homes or more), where a viability case has been made to the Council at the planning application stage, the Council reserve the right to review **the viability of** developments upon completion, or in the case of strategic schemes of over 500 units on completion of 75% of housing units. In all cases where a schemes gross development value against updated costs/normal profit has been exceeded the Council will claw back funding up to the delivery of a policy compliant scheme applicant shall pay a financial contribution equivalent of:
 - a. Up to a maximum of 70% in the uplift in the value of the scheme; or
 - b. The policy compliant level, whichever is lowest.

Any clawback contribution shall be used by the Council for the delivery of affordable housing and/or infrastructure intended to be delivered as part of the development, in accordance with the priorities set out in the Local Plan or Infrastructure Delivery Plan.

If the viability of the development is found to have worsened then the Council shall reimburse the applicant and / or agree a revised affordable housing tenure allocation, subject to the resultant value of the reimbursement / reallocation not taking the costs of the scheme lower than would be achieved through zero policy compliance.



Q5: Do you have any comments on the Integrated Assessment Report Addendum, in respect to this particular Main Modification? Please provide them in the box below:

No



Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

No

Q7: Do you have any comments on one of the Councils Additional Modifications? Please provide them in the box below:

No

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MM023, MM024 and MM025

Q2: Do you consider that this Main Modification is:

☐ Legally compliant

☒ Sound

☐ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

The amendments proposed to Part 1 of Policy CC1 in MM024, to remove the requirement for development to demonstrate how it provides for energy needs by using on site or local renewable energy resources and to make it clear that the requirements listed in Part 2 of Policy CC1 are only to be met where relevant and practicable, are considered to be necessary in order to avoid the policy wording introducing local efficiency standards which exceed current national standards.

Local efficiency standards above national Building Regulations should only be imposed where robust costed evidence has been provided. Such evidence has not been provided in this instance and therefore the relevant national standards remain the Building Regulations. The proposed amendments to the supporting text to Policy CC1 at MM023 and MM025 to make it explicit that the minimum requirements are set in Building Regulations (including those which relates to the Future Homes Standard), as well as the removal of the presumption that the requirements listed in Policy CC1 will be met unless shown to be unviable, are therefore welcomed to ensure that this Policy is both effective and appropriately justified.

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MM026 and MM027

Q2: Do you consider that this Main Modification is:

☐ Legally compliant

☒ Sound

☐ None of the above

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The amendments proposed to Part 1 of Policy CC2 in MM026, and to its supporting text in MM027, to remove the requirement for all new development to incorporate renewable energy production and storage onsite and instead state that the Council will support development proposals which incorporate renewable energy production and storage onsite, are considered to be necessary in order for Policy CC2 to be effective. These proposed amendments will enable Policy CC2 to align with the proposed amendments to Policy CC1 and will avoid the policy wording introducing local efficiency standards which exceed current national standards.

Similarly the amendments proposed to Parts 2, 3, 4 and 5 of Policy CC2 in MM026, to clarify that connectivity of new residential development projects to community / district heating systems should only be where feasible and to remove requirements relating to heating and cooling systems, are considered to be necessary in order for Policy CC2 to be effective.

Local efficiency standards above national Building Regulations should only be imposed where robust costed evidence has been provided. Such evidence has not been provided in this instance and therefore the relevant national standards remain the Building Regulations.



Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

You will need to say why the change(s) will make the Main Modification legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

N/A



Q5: Do you have any comments on the Integrated Assessment Report Addendum, in respect to this particular Main Modification? Please provide them in the box below:

No



Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

No

Q7: Do you have any comments on one of the Councils Additional Modifications? Please provide them in the box below:

No

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Personal Details

Title	Mr
First Name	Michael
Last Name	Burrow
Address	
Commenting on behalf of (if relevant)	Redrow
Organisation (if relevant)	Savills (UK) Limited
Telephone	
Email	

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Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM036

Q2: Do you consider that this Main Modification is:

☐ Legally compliant

☒ Sound

☐ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

The amendment proposed to the supporting text for Policy NE1 in MM036, to clarify how to interpret the Policy NE1 requirement for provision of 'appropriate buffer zones' is considered to be required in order to reduce potential uncertainty arising during the design process and improve the effectiveness of this policy. Buffer zones can have big implications on the design, capacity and deliverability of development sites.



Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

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Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

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Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM037

Q2: Do you consider that this Main Modification is:

☒ Legally compliant

☒ Sound

☐ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

The proposed MM037 amendment to Part 2c of Policy NE2 is required in order recognise that appropriate evidence has not been provided to justify the previously-proposed requirement for 50:50 native and non-native climate and disease resistant tree species. The proposed wording now provides the necessary flexibility to enable species mix to be chosen to be appropriate to the site and development proposal in question.

The proposed amendment to Part 3 of Policy NE2 in MM037 is also required in order to clarify that mature trees are not specifically protected by national planning policy or legal requirements in the same way as veteran trees or ancient trees and to recognise that such trees can be removed, where necessary, in order to facilitate development subject to appropriate compensatory mitigation being provided.

Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

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Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

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Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM039, MM040 and MM041

Q2: Do you consider that this Main Modification is:

☒ Legally compliant

☒ Sound

☐ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

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The proposed amendment to Parts 1 and 2 of Policy NE3 in MM040, along with the associated proposed amendments to the supporting text for Policy NE3 in MM039 and MM041 are required in order to clarify that: the legal requirement is for qualifying developments to deliver at least 10% BNG; and whilst the Council is seeking for more than the legal requirement the higher 20% target is only an aspiration rather than a requirement.

These amendments acknowledges that a Policy requirement of over 20% is not justified by the necessary supporting evidence on: local need or opportunities for a higher percentage; impacts on viability for development; and implementation.

Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

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N/A



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Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM043

Q2: Do you consider that this Main Modification is:

☐ Legally compliant

☐ Sound

☒ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

The proposed MM043 amendment to part 2 of Policy NE4, to clarify that residential developments should aim to meet the Urban Greening Factor of 0.4, is considered to be necessary to take into account the potential for such a requirement to result in additional costs over and above what would already be achieved through the delivery of the other green Local Plan infrastructure Policy requirements and the fact that the majority of the residential schemes used as case studies in the Green Space Factor Study (2023) evidence base document did not achieve 0.4. The inclusion of “aim to” means that it will not be compulsory to fully achieve this requirement.

The proposed modification to the supporting text to Policy NE4 in MM044 is helpful in clarifying how the Urban Greening Factor requirement can be met.

However the proposed amendment to part 4 of Policy NE4 in MM043, to require shortfalls in Urban Greening Factor provision to be made offsite, is not considered to be effective. Given that the proposed amendments to part 2 of Policy NE4 do not require the full Urban Greening Factor requirement of 0.4 there should not be a need to have to provide any shortfall offsite. The only exception to this should be where offsite green infrastructure (such as open space, SuDS or biodiversity enhancements) is already being provided as part of the development proposals and can count towards the development’s total Urban Greening Factor score.

Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

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In order to overcome the soundness concerns highlighted in Q3 it is considered that the wording of Policy NE4 should be further amended as follows [amended text in **bold**] to reflect the fact that the achievement of the specified Urban Greening Factor is a target rather than an actual requirement:

1. ~~The council will require a~~All major development proposals to should contribute towards the greening of the borough through the integration of multifunctional green and blue infrastructure within a development's site design, subject to viability.
2. All major residential development proposals, or proposals that are predominately residentially led, should aim to meet a minimum Greening Factor of 0.4.
3. All major non-residential development, or proposals that are predominately non-residentially led, should aim to meet a Greening Factor of 0.3.
4. **The Greening Factor should be met as far as possible on site, with any shortfall provided off-site as close as possible to the donor site. Off-site provision of green infrastructure should enhance local green infrastructure, having regard to relevant guidance and evidence such as the Local Nature Recovery Strategy, Playing Pitch and Outdoor Recreation Strategy and current climate and green infrastructure mapping. Off-site provision will be which is already being secured by conditions and/or planning obligations can count towards the Greening Factor score for a development proposal.** Where the Greening Factor cannot be met on site, then the council will work with applicants to identify offsite opportunities to enhance local green infrastructure. This would be secured by planning conditions and/or obligations and delivered in line with locally identified needs.



Q5: Do you have any comments on the Integrated Assessment Report Addendum, in respect to this particular Main Modification? Please provide them in the box below:

No



Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

No

Q7: Do you have any comments on one of the Councils Additional Modifications? Please provide them in the box below:

No

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MM049, MM050 and MM052

Q2: Do you consider that this Main Modification is:

☐ Legally compliant

☐ Sound

☒ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

It is noted that the proposed MM049 amendment to Part 1d of Policy EC1, along with the associated proposed new '2nd new para after EC1' in MM050, explain the ability for the inclusion of additional ancillary uses within Strategic Employment Areas and the restrictions preventing the further change of use of these ancillary facilities to other uses. This explanation is considered to facilitate the ability of Policy EC1 to achieve its aim of supporting and sustaining established Strategic Employment Areas.

Nevertheless it is considered that MM050 does not go far enough and should also have included specific confirmation in the supporting text that ancillary and complimentary uses can include uses such as local retail / food and drink / gymnasia and day nursery provision where this is demonstrated to directly benefit those working in that employment area. The absence of such facilities can, in some instances, increase travel demand and make areas less attractive to employers and staff. The inclusion would improve the effectiveness of implementing Policy EC1. There is also an opportunity for scale / size criteria can be introduced to control such uses if deemed necessary.

Furthermore, with regard to paragraph 127 of the December 2024 NPPF, the Council needs to ensure that regular reviews are undertaken of both the land allocated for development in plans, and of land availability. NPPF paragraph 127 makes it clear that if it becomes evident that there is no reasonable prospect for a planning application coming forward for the use allocated in a plan applications for alternative uses should be supported where the proposed use would contribute to meeting an unmet need for development in the area.

The layout of the Main Modifications schedule suggests that the criteria included within paragraph 8.12 of the supporting text are specific to Policy EC2, rather than also applying to Policy EC1. However the actual wording of the supporting text does not make this distinction. The Local Plan should not be introducing ambiguity. Whilst there is currently no indication that any of the SEAs will not come forward for meeting strategic employment needs, it should be recognised that the Local Plan is seeking to plan for a 20 year period. The Local Plan also needs to be in accordance with national planning policy. Accordingly the Local Plan wording should be explicitly stating that the criteria in paragraph 8.12 do also apply to Policy EC1.

Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

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In order to overcome the soundness concerns highlighted in Q3 it is considered that a '5th new paragraph after EC1' needs to be included (in MM050) as follows (proposed new additional text set out in **bold**):

"Notwithstanding the provisions set out in Part 1 of Policy EC1, if the Council considers that there is no reasonable prospect of a planning application coming forward for a proposal within use classes B2 (general industrial), B8 (storage and distribution), Class E(g) and sui generis (i.e. uses associated with B use class activity such as waste management facilities) within a SEA then applications for alternative uses on the land will be supported where the proposed use would contribute to meeting an unmet need for development in the area and complies with the criteria set out within paragraph 8.12".



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No



Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

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Commenting on behalf of (if relevant)	Redrow
Organisation (if relevant)	Savills (UK) Limited
Telephone	
Email	

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Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM071 and MM073

Q2: Do you consider that this Main Modification is:

- ☐ Legally compliant
- ☐ Sound
- ☒ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

In clarifying in the wording of Policy HO3 that the NDSS requirements only apply to all new residential development it is considered that MM071 does not go far enough to justify the inclusion of a specific NDSS requirement.

In relation to NDSS the PPG (Paragraph: 020 Reference ID: 56-020-20150327) sets out a requirement to consider need, viability and timing. It is noted that viability has been considered within the submitted viability assessments. However neither the Economic and Housing Development Needs Assessment reporting nor the Housing Delivery Topic papers include consideration of need and timing. The NDSS requirement included in the Local Plan is accordingly still considered to not to be justified by appropriate evidence.

Furthermore the inclusion of a reference in MM073 which clarifies that the Council's standards in relation to M4(2) and M4(3) are those which are set out within the Council's 'Homes for All' is also not considered to go far enough to justify the inclusion of these additional optional technical standards.

The PPG (Paragraph: 002 Reference ID: 56-002-20160519) makes it clear that LPAs can bring in the optional technical standards through setting appropriate Policies in Local Plans. The Main Modifications have not incorporated optional technical standards within a Local Plan Policy. The M4(2) and M4(3) provisions included within the SPD are only a material consideration, have not been through independent Examination in Public and could be changed further by the LPA without being tested at independent Examination in Public. The effect of MM073 is to uplift the SPD requirements from being a material consideration to being Development Plan Policy.

Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

You will need to say why the change(s) will make the Main Modification legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to overcome the soundness concerns highlighted in Q3 it is considered that the wording of Policy HO3 should be further amended as follows [amended text in **bold**] to makes these aspects of the Policy working a target rather than an actual requirement:

1. All major residential development is required to provide a variety of types, tenures and sizes that reflect local housing need. This includes planning positively for, the housing needs of Telford and Wrekin including but not limited to:
 - a. Homes for families with children
 - b. Lookedafter children
 - c. Care leavers
 - d. Young professionals
 - e. Students
 - f. Key Workers
 - g. Older people (including those who require retirement housing; housing with care and care homes)
 - h. People wishing to build their own homes
 - i. People who rent their homes
 - j. People with special needs and disabilities
 - k. Gypsies and travellers
2. All new residential development, across all tenures, **is required as a minimum should seek** to meet the internal space standards set out in the Nationally Described Space Standards.
3. All new residential development is required to provide private outdoor amenity space that is accessible and suitable for the intended occupants. Communal provision of outdoor amenity space in lieu of private outdoor amenity space for each dwelling, will only be accepted in flatted developments and for all types of properties in exceptional circumstances.
4. In certain exceptional circumstances, where it can be demonstrated that the creation of private amenity space is not possible due to land availability and/or property constraints, of land is sparse and the site is constrained due to viability, subject to the level and quality of amenity space provided in this form. Alternative outdoor spaces such as useable balconies and roof gardens would be acceptable in lieu of ground floor outdoor amenity space, where it is practicable to provide them.
5. All new residential development is required to demonstrate how its design is capable of adaptation and extension to accommodate the changing lifestyles and needs of households over time, with consideration of ~~in accordance with~~ the Council's Homes for All SPD, unless superseded by Government policy.
6. All major residential developments **must should seek to** include M4 (2) / M4 (3) housing in accordance with the eCouncils requirements or national standards (whichever is higher).



Q5: Do you have any comments on the Integrated Assessment Report Addendum, in respect to this particular Main Modification? Please provide them in the box below:

No



Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

Q7: Do you have any comments on one of the Councils Additional Modifications? Please provide them in the box below:

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How we will use your information

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We are asking for your personal details to allow us to contact you where we require clarification/further information. You do not have to include your personal details but not doing so might affect the council's ability to act on the information you have provided.

Personal Details

Title	Mr
First Name	Michael
Last Name	Burrow
Address	
Commenting on behalf of (if relevant)	Redrow
Organisation (if relevant)	Savills (UK) Limited
Telephone	
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Q1: Which proposed Main Modification does this comment relate to? Please state clearly the modification reference (*for example MM008*):

MM081

Q2: Do you consider that this Main Modification is:

☐ Legally compliant

☐ Sound

☒ None of the above

Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. Please be as precise as possible.

Alternatively, if you wish to support the legal compliance or soundness of the Main Modification, please also use this box to set out your comments.

The amendment proposed to Policy HO11 in MM081, to reduce the requirement for application sites delivering 100+ new dwellings from at least 5% to at least 3% of the housing as self-build or custom housebuilding serviced plots, is still not considered to be appropriately justified or necessary.

As explored through the discussion held at the Examination Hearing Sessions for Matter 6, it is recognised that the Self-Build and Custom Build Register may not be an accurate representation of need or a demonstration of genuine intention to construct. It is however the only available record of interest specifically covering the Telford and Wrekin area. Neither the entries on the Register nor the average rate at which planning permissions for self-build or custom housebuilding plots have been granted result in a figure which is as high as would be achieved if the proposed 3% threshold is applied.

Furthermore the proposed approach also disregards the contribution which can be made to meet a self-build or custom build need through the use of small sites, including on windfall opportunities. It should also be noted that the delivery of self-build / custom build plots as part of a major development scheme can present a number of operational and health and safety issues which have the potential to complicate and delay the progression of development sites.

The planning permissions granted for self-build or custom housebuilding plots so far have predominantly been on smaller sites and have not required plots to be made available on larger sites. Paragraph 73b of the December 2024 NPPF is clear that Local Planning Authorities should seek opportunities through policies to support small sites to come forward for self-build and custom-build housing. In this regard the proposed requirement is not considered to be either justified or in accordance with paragraph 36 of the December 2024 NPPF.

Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound, having regard to the test you have identified above where this relates to soundness.

You will need to say why the change(s) will make the Main Modification legally compliant and/or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In order to overcome the soundness concerns highlighted in Q3 it is considered that the wording of Policy HO3 should be further amended as follows [amended text in **bold**] to makes these aspects of the Policy working a target rather than an actual requirement:

1. The eCouncil will only support proposals for self-build or custom housebuilding where they are located within the built-up areas of Telford and Newport or where they are in accordance with Policies HO 12 (Housing Development in the Rural Area) or Policy HO 13 (Affordable Rural Exceptions).
2. Application sites delivering 100+ new dwellings **should are encouraged to** provide **at least 53% of the** housing as self-build or custom housebuilding serviced plots. Where provided within a wider development, self-build or custom housebuilding plots should have:
 - a. Access to a public highway and connections for electricity, water and waste water provided within the boundary of the plot, provided as agreed under the phasing plan for the development; and
 - b. Be secured for the development of self-build and/or custom housebuilding by an appropriately worded condition or S106.
3. Where supported as an exception to normal rural housing policy, the eCouncil will require an appropriately worded S106 agreement to ensure the plots are only provided for self-build or custom-housebuilding and meet the requirements set out within Policy HO13.
4. Developers will be required to actively market plots at a reasonable price that reflects a professional valuation until a buyer is found or for a minimum of 6 months. If after this period, the plot has not been sold, the developer will be permitted to return the plot to normal market use.



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No



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No

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Personal Details

Title	Mr
First Name	Michael
Last Name	Burrow
Address	
Commenting on behalf of (if relevant)	Redrow
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MM088

Q2: Do you consider that this Main Modification is:

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☐ Sound

☒ None of the above

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The addition of Part 2 of Policy DD1 in MM088, clarifying that Design Briefs will need to be submitted on a case by case basis for larger more complex estate developments, with content proportionate to the size of the proposal, is considered to improve the effectiveness of the Policy wording.

However this proposed amendment still provides ambiguity as to which housing, employment or mixed-use allocations will require Design Briefs. The National Validation requirements stipulate that planning applications for major development already need to be accompanied by Design and Access Statements, which should be sufficient to set out the supporting design rationale for planning application proposals for most individual allocations.

It is however accepted that there can be benefits for the production of a Design Brief where development proposals cross multiple individual sites / ownerships or to support and inform the approach to be taken for some new large sustainable communities, in order to demonstrate how comprehensive development can be achieved. For effectiveness therefore it is considered that the policy should therefore clearly state which allocations / development proposals would require the production of a Design Brief and justification should be provided for why this is deemed to be necessary.



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For effectiveness Policy DD1 should clearly state which allocations / development proposals would require the production of a Design Brief and justification should be provided in the supporting text for why this is deemed to be necessary.



Q5: Do you have any comments on the Integrated Assessment Report Addendum, in respect to this particular Main Modification? Please provide them in the box below:

No



Q6: Do you have any comments on a Proposed Revision to the Policies Map? Please provide them in the box below:

No

Q7: Do you have any comments on one of the Councils Additional Modifications? Please provide them in the box below:

No