

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

Word 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

The information you have provided will be used to inform Main Modifications to the Publication Version of the Telford and Wrekin Local Plan. We will only publish anonymised responses, parts of responses, or a summarised version of responses and will ensure individual survey respondents cannot be identified. This information is being processed under DPA – Schedule 2 (2a) (GDPR 2018 -Article 6 (1)e).

We will not share your personal information with any other external third parties unless required/permitted to do so by law. Your personal information will be held securely, and if shared it will be shared securely. We comply with data protection laws concerning the protection of personal information, including the General Data Protection Regulation (GDPR). For more information on how information is held by Telford & Wrekin Council please view the privacy page at <https://www.telford.gov.uk/terms>

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	Mrs
First Name	Jodie
Last Name	McCabe
Address	
Commenting on behalf of (if relevant)	
Organisation (if relevant)	
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.

The Planning Inspectors appointed to examine the Local Plan have recommended several Main Modifications to make the plan sound and legally compliant. These are shown on the **Schedule of Main Modifications** that has been published for consultation and have been subject to a further **Integrated Assessment Report Addendum**. These do not form part of the Main Modifications but are published alongside them and should be read in conjunction with the Main Modifications proposed.

All comments received will be sent to the independent Planning Inspector for consideration. Any comments received after the consultation close deadline will not be accepted.

The Council has also published proposed revisions to the Policies Map. These do not form part of the Main Modifications but are published alongside them and should be read in conjunction with the proposed Main Modifications.

Furthermore, the Council has prepared a schedule of 'Additional Modifications' to the Plan. These are minor changes to the Local Plan to deal with factual updates and clarifications, or address typographical, grammatical and presentational issues that do not affect soundness or legal compliance of the document. The Council considers that these do not materially affect the Plan. These 'Additional Modifications' are not subject to consideration by the Inspector and do not form part of the formal examination.

Representations should only relate to the proposed Main Modifications. This consultation is not an opportunity to repeat or raise further representations about the published plan or to seek further changes to the plan.

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

Please see attached paper

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.

Please see attached paper



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.

Please see attached paper



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:

N/a



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

N/a

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

N/a

Telford and Wrekin Local Plan – Main Modifications Consultation

Response from the Ministry of Defence

MM Ref	Topic	Legally Compliant?	Sound?	Please give details of why you consider this Main Modification is not legally complaint 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.	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.
MM044	Supporting Text To Policy NE4	Yes	No	The proposed modification notes that the Council is in the process of developing guidance in relation to the Greening Factor. Given that stakeholders have not been able to review this guidance, sufficient detail on, or justification in relation to, the delivery of the Greening Factor is not available. Therefore the MOD have concerns in relation to the justification of this policy.	In order to ensure this policy is appropriately effective and justified, the reference to future guidance should be removed. Any relevant requirements for the implementation of the Greening Factor should be included within the emerging Local Plan.
MM049	Policy EC1 Employment development in the urban area and SEAs	Yes	Yes	The MOD supports the inclusion of the new criteria after b “<i>Development proposals for sui generis uses associated with operational defence and security at MOD Donnington will be supported</i>”. This change addresses the concerns raised by the MOD in representations to earlier stages of the Local Plan so is welcomed. The change is in line with the requirements of Paragraph 102 of the NPPF 2025 which states: <i>“Planning policies and decisions should promote public safety and take into account wider security and defence requirements by:...b) recognising and supporting development required for operational defence and security purposes..”</i>	N/a
MM050	Supporting text to Policy EC1	Yes	No	This modification inserts a new para after policy EC1 and before 8.8, stating: “ <i>Employment uses on SEA areas include 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)</i> ”. Whilst the MOD has no issue with the principle of the proposed change, it is considered there is now inconsistency between the supporting text and the policy wording,	To ensure that the policy is effective and the supporting text appropriately supports the main policy wording, the employment uses definition should be widened to also include sui generis uses relating to Defence. This will ensure that the supporting text is consistent with the proposed additional criteria proposed under MM049.

				given the changes proposed to the policy under MM049. This undermines the effectiveness of the policy. This modification also inserts a fourth new paragraph after EC1 which states: “<i>The north Telford Strategic Employment Area contains MOD Donnington which is a strategic logistics hub for the armed forces therefore any development within the vicinity of the base needs to ensure it does not negatively impact military operation</i>”. The MOD in principle supports the inclusion of this additional paragraph as it is consistent with the requirements of paragraph 102 of the NPPF 2025. However, it is considered that the changes are not fully effective as the term ‘<i>military operation</i>’ is a relatively narrow term and it is important that Defence interests more widely are protected.	In order to ensure that the policy is effective, the MOD requests that a minor amendment is made to this proposed modification so that it refers to ‘<i>Defence interests</i>’ rather than ‘<i>military operation</i>’ to ensure that it appropriately covers all Defence interests.
MM088	Policy DD1 Design Criteria	Yes	Yes	The MOD supports the inclusion of the amended wording within criteria n which would, in addition to referring to existing businesses, also now refer to facilities in the vicinity of new development. This recognises that there are uses, other than businesses, that can be impacted by new development and as such provides a policy hook to also protect other facilities, such as Defence sites.	N/a
MM089	Supporting text to Policy DD1	Yes	Yes	This modification inserts a second new paragraph after 10.12, stating: “<i>In the local area there are two strategic MOD sites located in and adjacent to Telford including MOD Donnington and RAF Shawbury. Applications for development should not compromise, restrict or otherwise degrade the operational capability of MOD sites and/or assets. The MOD should be consulted on development proposals for noise sensitive development where the existing noise source is related to defence activities.</i>” The MOD supports this amendment which will help to protect Defence interests within the Telford and Wrekin area.	N/a