

Strategic Planning Team  
Telford & Wrekin Council  
Southwater One  
Telford  
TF2 2FH

Your Ref

Our Ref

Wednesday 15 July 2026

Dear Strategic Planning Team,

**Telford and Wrekin Local Plan Main Modifications consultation**

Thank you for your consultation on the above document.

The Trust is a statutory consultee in the Development Management process and is responsible for the management and safeguarding of inland waterways, reservoirs and associated infrastructure. These assets form part of the borough's wider green-blue infrastructure network and contribute to health, wellbeing, biodiversity and place-making.

We welcome the opportunity to comment on the Schedule of Main Modifications. Our comments are provided below:

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

This response relates to MM123 and MM124 (Policy ML4 – Land Stability).

**Q2: Do you consider that this Main Modification is:**

Sound ✓

Legally compliant ✓

**Q3: Please give details of why you consider this Main Modification is not legally compliant and/or unsound. 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 Canal & River Trust supports the proposed Main Modifications and considers that they positively address the points raised through earlier representations, including those set out in our Matter, Issue and Question (MIQ) response<sup>1</sup>.

In particular, the modifications to Policy ML4 (MM123 and MM124) provide helpful clarification that:

- land stability issues may arise not only from historic ground conditions but also from development itself; and
- public infrastructure and third-party assets have the potential to be affected by land stability issues.

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The Trust welcomes the inclusion of explicit reference to third-party assets, which ensures that critical infrastructures, including those associated with the inland waterway network, (such as associated reservoirs and feeder channels), are appropriately considered within land stability assessments.

Furthermore, MM124 introduces supporting text encouraging engagement at the pre-application stage and, where appropriate, consultation with the Canal & River Trust. We support this addition, which reflects established best practice and our pre application advice service, and ensures that potential impacts on waterway infrastructure are identified and addressed at an early stage in the development process.

Taken together, these Main Modifications improve the clarity, effectiveness and deliverability of Policy ML4 without fundamentally altering its intent. They reinforce the importance of properly assessing and mitigating land stability risks in accordance with national policy and guidance.

The Trust is satisfied that the Main Modifications are sound and legally compliant, and that they provide an appropriate and proportionate framework to manage land stability issues, including in relation to canals, reservoirs and associated infrastructure.

**Q4: Please set out what change(s) you consider necessary to make the Main Modification legally compliant and/or sound**

No further changes are considered necessary.

**Q5–Q6**

The Trust has no specific comments to make in respect of the Integrated Assessment Report Addendum or the proposed Policies Map revisions.

**Q7: Do you have any comments on one of the Councils Additional Modifications?**

AM14 reinforces MM123 by expanding the list of potential receptors that may be affected by land stability issues to include visitors, private property and public property. This further clarification is welcomed by the Trust.

AM15 comprises largely factual updates and clarifications, including updated terminology and refinements to supporting text and evidence references. It also clarifies that safety risks associated with historic coal mining are only one of several factors contributing to localised land stability issues. The Trust supports these changes, which improve clarity, accuracy and consistency without affecting the overall policy approach.

Overall, we are satisfied that the Additional Modifications are appropriate and do not materially affect the soundness of the Plan. They assist in improving clarity and usability of the document and align with the clarifications introduced through the Main Modifications.

Yours sincerely,

**Richard Forbes MRTPI**  
Area Planner

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