



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

20th July 2026

VIA EMAIL ONLY

Dear Sir/Madam

Response to Main Modifications Consultation – Telford & Wrekin Local Plan Review

Lioncourt Homes have submitted representations on the Main Modifications consultation, as part of the Telford & Wrekin Local Plan Review.

These representations have been submitted through the accompanying representation form. We have undertaken a separate form for each Main Modification we are responding to and have amalgamated these together to create one document.

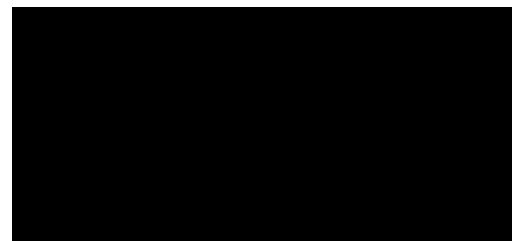
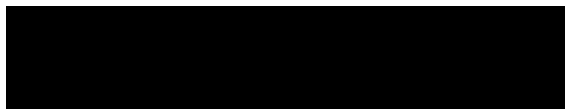
For the purpose of clarity, we have responded to the following Main Modifications:

- MM005 and MM016
- MM015
- MM040
- MM043
- MM088 and MM142
- MM104

Representations have also been made on the amendments to the policy map; these can be found on page 20 of the accompanying representation form.

Should you have any questions or queries on our representations, please don't hesitate to contact me.

Yours Faithfully
Harriet Bray MRTPI



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	Miss
First Name	Harriet
Last Name	Bray
Address	
Commenting on behalf of (if relevant)	Lioncourt Homes
Organisation (if relevant)	Lioncourt Homes
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*):

MM005 and MM016

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 Main Modifications set out in both MM005 and MM016 recognises the updated overall housing requirement, following the amendments to the Plan Period and the subsequent emerging evidence.

Before the Main Modification, the supporting text recognised a certain percentage of these homes as being within the Council's housing supply. The exact figure has been removed through the Main Modification. It is considered that understanding the proportion of these houses which have been delivered, and in turn what is left to deliver, would assist in creating an effective strategy.

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.

The Main Modification can be rectified by providing an updated percentage of what has been delivered, and in turn how much is left to be delivered.

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*):

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.

Modifications have been made to bullet point 5(c) of the Policy SP4, which relates to windfall development and brownfield land.

The policy has been amended to now read 'well-designed windfall development in the built up areas on suitable brownfield sites'. This policy change now implies that windfall development will only be supported in built up areas on 'suitable brownfield land'. It is Lioncourt's position that this is not in compliance with the NPPF. Whilst a brownfield first approach is often preferred, it is considered that this cannot restrict development coming forward. Telford and Wrekin have revised their windfall development to 120 per annum throughout the Plan Period. It is not evidenced that this can be achieved solely on brownfield land.

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.

An amendment could be made to remove the suitable brownfield sites wording, and replace this with wording which confirms a 'brownfield first' approach but does not restrict windfall development on Green Field sites coming forward, where appropriate.

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*):

MM040

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.

Main Modification MM040 outlines that proposals for major development should aim to provide more than 10% of BNG on Sites, with the local aspiration of 20%. The Main Modification is unclear as to whether or not proposals which provide the minimum of 10% BNG will be supported.

Whilst we are supportive of providing BNG, the imposition of 20% could have implications for the delivery of Site such as viability. It should also be considered that the Biodiversity Net Gain Guidance published by MHCLG (Paragraph: 006 Reference ID: 74-006-20240214) outlines that 'plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain...unless justified'. There is limited justification for the uplift of 20%, especially with the removal of supporting text paragraph 7.16 in MM041.

Therefore, we cannot support this Main Modification in its current state.

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.

The wording of this policy should be amended to firstly set out that developments must provide a minimum of 10% BNG, to ensure that this policy is fully reflective of National Policy. To ensure there is no confusion when reading or interpreting the policy, the Council's aspirations should be clearly set out. Policy or supporting text should confirm the position that this is clearly an aspiration and that developments will need to provide the minimum in line with National Policy and Legal Requirements.

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*):

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.

This comments relates more to the unsoundness of the Policy, as opposed to the Main Modification specifically. Whilst Lioncourt understands the importance of Urban Greening and its requirement within developments, there is currently no methodology proposed within the Policy (however, we do acknowledge a document is referenced in the supporting text). For the avoidance of doubt, the methodology (or the document specifically referencing the methodology) should be referred to in the policy to ensure that all those who need to include it within their development does so, and uses accurate and up to date calculations.

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 be a sound policy, the wording of the policy should be revised to include clear directions of what the core document is and where the methodology can be found.

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*):

MM088 and MM142

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.

This comment relates to the new inclusion of design briefs for larger, more complex estate developments. Lioncourt understands that these will be required on a case-by-case basis. This has been inserted as Point 2 of the policy through Main Modifications.

There is some ambiguity on how it will be determined if a site will need a design brief, as there is very little commentary in the supporting text.

Moving forward to Main Mods MM142, there is some further commentary on these design briefs, outlining that a design brief is a document which is submitted alongside any Masterplan with any outline, full or hybrid planning application. But again, there is little indication as to what scale or type of development is required to provide this.

Without this clarification, delays may occur at validation stage – or even invalidation- if this is deemed to be a requirement.

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.

Amendments should be made to the supporting text of Policy DD1 and indeed to MM142 to outline the scale and type of development where the design briefs are to be required. This will ensure that planning applications can be positively prepared.

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*):

MM104

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.

Main Modification 104 relates to the supporting text of Policy CI3, where the requirement to provide a Landscape Management Plan prior to the determination of a full or reserved matters application has been introduced.

Whilst Lioncourt Homes is broadly supportive of this, there is no justification as to why this has to be brought forward prior to determination. These details could delay a consent, especially where there are conditions attached to an outline permission which requires additional landscaping details to be provided prior to commencement.

If these details are not finalised before the determination of the RM application, there could be a delay to getting the consent – which could have a knock on effect of when the housing can be delivered.

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.

It is requested that the supporting text be amended to ensure these details within the Landscape Management Plan can be secured by a suitably worded condition, which will ensure that there are no delays to consents being granted, and in turn, the delivery of housing.

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

Lioncourt have two revisions to the policy map they feel are appropriate.

1. Within the policy map amendments, there is reference to an amended green network layer and that this has been updated since the regulation 19 consultation. Could this please be clearly marked on the Plan?
2. Whilst its not a comment on the policy map amendments, it is a request that on the published policy map there is a layer which clearly defines the level of affordable housing within that area. The policy itself reads fine, but there is the opportunity to demonstrate this positively spatially through the map.

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

Click or tap here to enter text.