

**TELFORD & WREKIN LOCAL PLAN 2011-2031****K29 - Council's Statement on review of its TWLP Submission Evidence base and on re-publication of Document F10b**

The Council has now republished Document F10b (dated 24<sup>th</sup> April 2017), which is its response to the Inspector's note of 30th March 2017. The Council has also republished Documents K13h, K24-32c and K27c. These Documents can be viewed in the Examination Library.

For the avoidance of doubt, the Inspector has not commented at this stage on the acceptability in soundness terms of adopting the findings of the Kestrel Close. He sought the Council's view on whether the Kestrel Close findings could be adopted if other work was deemed to be impractical. Further, the Inspector has stated that the adoption of an OAN figure in excess of the Local Plan's stated housing requirement would have implications including the need to revisit relevant parts of the evidence base to justify that amended figure. The Inspector indicated that a number of the supporting evidence documents would need to be revisited and, where necessary, updated e.g. those relating to housing supply, transportation and infrastructure evidence, sustainability appraisal and Habitat Regulations Assessment.

Table 1 (below) shows details of studies which have been reappraised and updated in response to the proposed increased housing figure of 864 dpa. Those reappraisals/updates can be viewed in the Examination Library.

Table 2 (below) shows details of studies relating to the capacity of infrastructure which have been reviewed in response to the proposed increased housing figure of 864 dpa, but not updated. The reasons for not updating these are that they will require site specific data to assess the need for infrastructure and as such the current studies remain relevant and provide the best and most robust available evidence in respect of the increased figure. The Council have also consulted with the Environment Agency, Severn Trent Water and Highways England who have supported the view that the Table 2 studies do not need updating. (The EA, STW and HE responses are appended to this note).

TABLE 1

<b>1. Relevant TWLP Evidence Document Updates for submission</b>				
<b>Library Ref No</b>	<b>Publication</b>	<b>Date of Document</b>	<b>Author</b>	<b>Submission date target</b>
K29	Council's Statement on review of its TWLP Submission Evidence base	9 June 2017	Telford & Wrekin Council	9 June 2017
G20	Update of the Strategic Growth Options in Appendix 4 of A3a	June 2017	Enfusion	9 June 2017
G21	Addendum to Waste Evidence Base Report 2015 C6b	May 2017	Sacks Consulting	9 June 2017
G22	Addendum to Telford & Wrekin Strategic Housing Market Assessment (SHMA) 2016 – Final Report C2b-i	June 2017	Arc4 Ltd/TWC	9 June 2017
G23	Addendum to Telford & Wrekin Retail & Leisure Capacity Study and Health Check 2014 – Final Report C1f-i	June 2017	White Young Green	9 June 2017
G24	Note on Housing Land Supply, in response to Inspector's note (F10) dated 30th March 2017, and further to document F10a and F10b	June 2017	Telford & Wrekin Council	9 June 2017

TABLE 2

<b>2. Relevant TWLP Evidence Documents reviewed but require No Update</b>				
<b>Library Ref No</b>	<b>Publication</b>	<b>Date of document</b>	<b>Author</b>	<b>NOTE</b>
C4a-ii	Telford Local Plan – Supporting Modelling & Highway Infrastructure Plan	October 2015	CH2M	See appendix a – Highways England e-mail – Telford & Wrekin Local Plan
C6c-iii	Telford & Wrekin Detailed Water Cycle Study – Update 2015	September 2015	AMEC Foster Wheeler	See appendix b – Severn Trent Water e-mail - post EiP response  See appendix c – Environment Agency letter - Post Examination Matters in Relation to the Telford & Wrekin Local Plan
C6f-iii	Telford & Wrekin Strategic Flood Risk Assessment Phase 2 Addendum	October 2015	Telford & Wrekin Council Engineering Services	See appendix c above

9<sup>th</sup> June 2017

Appendix A

**From:** Thomas, Patrick [<mailto:Patrick.Thomas@highwaysengland.co.uk>]

**Sent:** 02 June 2017 12:07

**To:** Ashford, Gavin <[gavin.ashford1@telford.gov.uk](mailto:gavin.ashford1@telford.gov.uk)>

**Cc:** 'CHIU Kelly' <[kchiu@systra.com](mailto:kchiu@systra.com)>; WHITE Lee <[white@systra.com](mailto:white@systra.com)>; Jaffier, Robert <[Robert.Jaffier@highwaysengland.co.uk](mailto:Robert.Jaffier@highwaysengland.co.uk)>

**Subject:** Telford & Wrekin Local Plan

**Importance:** High

Dear Gavin,

Thank you for your email dated 1 June 2017. We have reviewed the information attached to your email and note that there are five housing sites (total of 1,285 units) which will now be removed from the list of local plan allocations. These include:

- H1 - Muxton – 750 units
- H7 - Phoenix School – 200 units
- H8 - Charlton School – 165 units
- H13 - Newport Station Road – 120 units
- H14 - BRJ – 50 units
- Total Units – 1,285 units

We also understand that there is no intention to include or identify any replacement/alternative housing sites at this stage.

On this basis, it is considered that the strategic modelling work undertaken by Telford and Wrekin Council in 2015 represents a robust scenario, as it included all of the original housing allocations as per the best available information at that time.

Given the above, it would be reasonable to expect that the removal of the five sites would result in less of an impact on the Strategic Road Network than originally predicted by the modelling undertaken in 2015.

We would therefore support the position you have taken and would not require any additional strategic modelling work to be undertaken by Telford and Wrekin Council at this stage. We remain content that the Plan in current form has been soundly developed.

However, it is important to note that should Telford and Wrekin Council subsequently submit a separate Site Allocations Development Plan Document, we may request the modelling evidence to be refreshed to take into account future changes.

Regards

Patrick

Appendix A

**Patrick Thomas, Asset Manager**

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Appendix B

**From:** Growth Development [<mailto:growth.development@severntrent.co.uk>]  
**Sent:** 26 May 2017 16:16  
**To:** Ashford, Gavin <[gavin.ashford1@telford.gov.uk](mailto:gavin.ashford1@telford.gov.uk)>  
**Cc:** Clarke, Doug <[Doug.Clarke@severntrent.co.uk](mailto:Doug.Clarke@severntrent.co.uk)>; Growth Development <[growth.development@severntrent.co.uk](mailto:growth.development@severntrent.co.uk)>  
**Subject:** RE: Telford & Wrekin Local Plan

Hi Gavin,

Further to your enquiry below, I can now provide you with the following information.

The revised housing numbers are included in our plans, however from our overall growth perspective there are no issues. We would appreciate early consultation when the sites come forward so that we can influence the phasing and delivery of the sites so as to make sure we have got the necessary assets in place.

Kind regards

Dawn

Dawn Williams

Growth & Water Efficiency Analyst

( **07554114125** mobile

\* [dawn.williams@severntrent.co.uk](mailto:dawn.williams@severntrent.co.uk)

## Appendix C

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Telford & Wrekin Council  
Development Management  
1<sup>st</sup> Floor Upper  
Wellington Civic Offices  
Larkin Way (Off Tan Bank)  
Telford  
TF1 1LX

**Our ref:** SV/2012/106308/CS-  
04/EW1-L01

**Your ref:**

**Date:** 23 May 2017

**F.A.O: Mr. Gavin Ashford**

Dear Sir

**POST EXAMINATION MATTERS IN RELATION TO THE TELFORD AND WREKIN  
LOCAL PLAN**

I refer to your email of the 4 May 2017 and subsequent meeting to discuss matters raised at the recent Local Plan examination. I would offer the following comments to assist you moving forward.

As stated in your email we note that the Council are to consider a higher housing target but that these additional dwellings will not be included within the Local Plan Site Allocations.

**Evidence Base:** The importance of an up to date and robust evidence base is supported by the National Planning Policy Framework (NPPF). Paragraph 158 of the NPPF requires demonstration of a “proportionate evidence base” and ensure that “the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.” The alteration to the higher housing numbers has raised a question with regard to appropriateness of the previously submitted evidence base. With reference to matters within the remit of the Environment Agency this would relate to the Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS) both of which were progressed through dialogue and agreement between your Council and ourselves along with other external consultees.

**Strategic Flood Risk Assessment (SFRA):** We previously commented on the Phase 2 SFRA Addendum which provided an updated assessment of the allocated sites not addressed in the 2008 SFRA along with documenting roles and responsibilities since the introduction of the Flood and Water Management Act 2010 and the creation of Lead Local Flood Authorities (LLFA).

The updated SFRA, in conjunction with the Local Flood Risk Management Strategy,

Environment Agency  
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..



offers a comprehensive suite of information on all sources of flooding throughout the borough and demonstrates how Telford & Wrekin can sustainably accommodate growth over the plan period.

The additional dwellings required are not to be included within the Local Plan sites but rather contained, and assessed, as part of a latter allocation process, potentially a Development Plan Document (DPD). Therefore, in relation to the current Local Plan submission, the SFRA evidence base represents best available information in relation to flood risk issues throughout the borough and the allocated sites. As further sites are brought forward then they will need to be assessed to ensure their allocation can be justified with regard to flood risk. The need for this further assessment (evidence) is supported by the NPPF and NPPG to help avoid inappropriate development in areas at risk of flooding.

**Water Cycle Study (WCS):** Similar to the above we can accept the rationale behind how your Council will be moving forward with regards waste water and water supply, both previously assessed through the WCS that accompanied the Local Plan submission. We were engaged in the production of this piece of evidence and also note the views of Severn Trent Water with regard to the revised housing numbers and their infrastructure planning.

**Conclusion:** We would raise no concerns with the approach being taken by your Council with regard to the higher housing target and the current evidence base. Both the SFRA and the WCS, in their current state, provide a robust evidence base to support the allocations within the Local Plan. Any subsequent site allocations outside of the current Plan will then require updated evidence to support them. We will engage in further discussions with your Council to ensure that any such evidence is similarly robust and sound.

I trust the above is of assistance at this time.

Yours faithfully

**Mr. Graeme Irwin**  
**Senior Planning Advisor**  
Direct dial: 02030 251624  
Direct e-mail: [graeme.irwin@environment-agency.gov.uk](mailto:graeme.irwin@environment-agency.gov.uk)