



**TELFORD & WREKIN LOCAL PLAN
PROPOSED MAIN MODIFICATIONS**

**INTEGRATED APPRAISAL
(Sustainability Appraisal; Strategic
Environmental Assessment; Health Impact
Assessment & Equality Impact
Assessment)**

**Sustainability (Integrated) Appraisal (SA)
Addendum Report**

July 2017

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Telford & Wrekin Council

Local Plan Proposed Main Modifications

INTEGRATED APPRAISAL (IA) Sustainability Appraisal (SA); Strategic Environmental Assessment (SEA); Health Impact Assessment (HIA); Equality Impact Assessment (EqIA)

Sustainability (Integrated) Appraisal (SA) Addendum Report

July 2017

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1.0 Introduction

Submission & Examination of the TWLP

- 1.1 The Telford & Wrekin Local Plan (TWLP) (2011-2031) was submitted on 30 June 2016 to the Planning Inspectorate for independent Examination in accordance with the Town & Country Planning Regulations 2012. This version of the plan was prepared to take into account the results of the previous consultation on the draft document undertaken between 1 February and 15 March 2016. Hearings were held in public in early 2017 with the last hearing session of the Examination programme completed on 10 February 2017.

SA/SEA, HRA, HIA, & EqIA

- 1.2 The TWLP was accompanied by the Submission Sustainability (Integrated) Appraisal (SA) and Habitats Regulations Assessment (HRA) Reports (June 2016) in accordance with the National Planning Policy Framework (NPPF) 2012, the Strategic Environmental Assessment (SEA) Regulations, and the Habitats Regulations. The Council had chosen to undertake an integrated appraisal that encompasses the findings of the HRA, and the health and equalities impact assessments into one Sustainability (Integrated) Appraisal Report.
- 1.3 As the requirements for HRA are driven by different legislation, the Submission HRA Report (June 2016) was presented in detail as separate documents but the summary findings were incorporated into the SA Report. Health impacts are addressed through requirements for SEA. The findings of the Equality Impact Assessment (EqIA) were also integrated into the SA; details were presented as a separate Appendix to clearly demonstrate the compliance by the Council with requirements of the Equality Act 2010. Thus, the appraisal/assessment processes were undertaken in accordance with legislative requirements, extant guidance, and good practice. This SA Addendum Report refers to integrated appraisal; where necessary, specific reference is made to the Submission HRA and the EqIA Reports.
- 1.4 Some issues regarding the SA were raised by consultees during the Hearing sessions, principally associated with the detailed SA findings for site allocations/options promoted by developers and their agents. There were no concerns raised by the statutory environmental bodies – Environment Agency, Historic England and Natural England; the Inspector did not have any concerns regarding the soundness of the SA.

Interim Findings of the Inspector

- 1.5 The Inspector requested that the Council reconsider its Objectively Assessed Housing Need (OAHN) evidence in his Note [F10]¹ on progress with the Examination. Having reconsidered the OAHN evidence, the Council has

¹ [http://www.telford.gov.uk/downloads/file/5494/f10 - inspectors note to twc - 30 march 2017](http://www.telford.gov.uk/downloads/file/5494/f10_-_inspectors_note_to_twc_-_30_march_2017)

revised the housing requirement for the Local Plan by applying an OAHN of 864 rather than 502. This is equivalent to an increase of 1,725 dwellings in the housing requirement (17,280 minus the previous planned target of 15,555 dwellings). These additional dwellings will not be allocated in the Plan at this stage. Whilst the total number of dwellings is increased, there is no change to the submitted Spatial or Distribution Strategy; the percentage distribution of housing will not change between the 15,555 and 17,280 figures - as follows:

- Telford 86% (13,400 to 14,950)
- Newport 8% (1,200 to 1,330)
- Rural Areas 6% (900 to 1,000)

- 1.6 The Council's Shaping Places Strategy & Options Document (June 2013) proposed three reasonable options for the overall level of housing growth—approximately 13,640; 17,800; & 26,500 dwellings. These three options were subject to Sustainability Appraisal and reported in section 4 with details in Appendix IV of the Integrated (Sustainability) Appraisal Report² (June 2016) [A3 & A3a]. Following further evidence studies, in 2015 the Council identified three revised reasonable options – 11,250; 15-16,000; & 20,000 dwellings. These options for housing growth were similarly tested through SA by the same independent specialists – and as reported in [A3 & A3a]. Summary findings of the SA are presented in Table 4.4; reasons for selection or rejection of these strategic options are provided in Table 4.5. An overall housing target of 15,555 dwellings was progressed in the Local Plan submitted for examination ie. Option 2 (15-16,000).
- 1.7 The Council has revised the housing target representing an overall increase in dwellings from 15,555 to 17,280. The Spatial and Distribution Strategies have not changed. However, as this increase in housing could have significant likely effects, the SA of the three previous strategic options has been revised and includes the new option with a figure of 17,280 dwellings. This is also in accordance with the Inspector's Note that commented that additional SA work may need to be undertaken.

Proposed Main Modifications to the TWLP

- 1.8 The Council has carried out further work to address the matters set out in the Inspector's Interim Findings Note (March 2017) to reflect matters discussed at the hearings and addressed in written representations. This has resulted in significant changes to the plan, principally in respect of the objective assessment of housing needs, the overall housing requirement, and the allocation of housing needs. The draft modifications require the Council to progress a Sites Allocation Local Plan in order to allow the housing sites to be reconsidered. Four housing sites are proposed to be deleted from the plan and the sites to be retained within the TWLP all have an extant planning permission or section 7(1) consent).

² http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/1229/telford_and_wrekin_local_plan_2011-2031/2

- 1.9 Any proposed main modifications to the TWLP that might give rise to significant sustainability effects need to be subject to SA. The draft proposed main modifications³ also include many modifications that were previously proposed by the Council and previously addressed through the SA process (Appendix XI June 2016).

Purpose & Structure of the SA Addendum Report

- 1.10 The purpose of this SA Addendum Report is to:
- demonstrate how the proposed main modifications have been screened for significance with regard to SA requirements
 - report the refreshed and new SA

Matters with regard to the SA that were raised through the examination stages have been addressed through the proposed changes to the plan and the intention to develop a Site Allocations Local Plan. The development of this plan will be subject to SA and issues raised will be taken into account where relevant.

- 1.11 The principle of addressing matters raised through examination by publication of an SA Addendum Report is established in English Case Law (see The Rochford Judgment⁴). SA is an iterative and ongoing process that aligns with the iterative plan-making process. There is no requirement to repeat previous appraisal studies and this SA Addendum Report addresses matters and issues arising from the examination and proposed modifications of the TWLP. With regard to compliance with legislative and policy requirements, this SA Addendum Report comprises a further part of the SA Report as submitted in June 2016 and has been prepared in accordance with relevant guidance and legislative requirements. It seeks to be a proportionate assessment relevant to the stage of plan-making and in line with NPPF requirements (paragraph 167).
- 1.12 Following this introductory section, the screening of the proposed modifications to the TWLP for SA/SEA significance is described in Section 2. The SA findings of assessment of significant changes is reported in Section 3, conclusions and an outline of the next steps is provided in Section 4. Further details are set out in technical appendices I & II.

³ Examination of TWLP: Schedule of Proposed Main Modifications (July 2017)

⁴ Cogent Land LLP v Rochford District Council (2012) EWHC 2542

2.0 Methods

SA/SEA Screening for Significance of Proposed Modifications

- 2.1 Many of the proposed changes to the TWLP are minor, concerned with correcting errors, addressing omissions, and providing more clarity. The main changes are associated with the requirement for the uplift in housing and the removal of site allocations into a later separate Site Allocations Local Plan. The proposed changes were screened for their significance with regard to SA using professional judgment – do the changes, deletions and additions significantly affect the findings of the SA Report (2016) accompanying the TWLP Submission and/or do they give rise to significant environmental/sustainability effects?

Strategic Growth Options

- 2.2 The revised SA was undertaken by the same independent SA specialists and using the same SA Framework of Objectives for sustainability relevant to the Telford & Wrekin plan area. The assessment took into account relevant updated evidence, as well as comments from the key stakeholders Severn Trent Water and the Environment Agency. A pragmatic and proportionate approach was taken to the SA in consideration of this stage of plan-making and examination. The refreshed SA considered the 4 options for overall housing growth as follows:

- Option 1 11,250 dwellings
- Option 2 15-16,000 dwellings
- Option 3 17,280 dwellings
- Option 4 20,000 dwellings

SA of Proposed Main Modifications to the TWLP

- 2.3 The refreshed and new appraisals identified as required through the screening were carried out using the same methods and SA Framework of Objectives as the previous work, reported in 2016 [A3 & A3b], and using any relevant updated baseline evidence, thus providing continuity and consistency of process. The appraisals were undertaken to the same level and by the same independent specialist consultants.

3.0 SA of Significant Changes

Screening of Proposed Main Modifications for SA Significance

- 3.1 The detailed findings of the SA Screening of the Proposed Main Modifications to the Submission TWLP (2011-2031) and as agreed with the Inspector to the Examination are presented in Appendix I of this SA Addendum Report. Many of these modifications were previously suggested by the Council and addressed through the SA in the Submission Integrated Appraisal/SA Report June 2016 [A3] and detailed in Appendix XI [A3a]. Most changes are concerned with corrections, clarification, and updating. The significant changes at this stage include the objective assessment of housing needs, the overall housing requirements, and the allocation of housing sites - and those arising from discussions at the Hearings, reported in the Inspector's Interim Note to the Council [F10, March 2017].
- 3.2 Thus the SA screening identified that the following elements of the TWLP were significant and could have potential sustainability/environmental effects, so should be subject to refreshed or new sustainability appraisal:
- Strategic Growth Options (11,250; 15-16,000; 17,280; 20,000 dwellings)
 - Spatial Strategy Policy SP1 (Telford); SP2 (Newport); SP3 (Rural Area)
 - Policy HO1 Housing Requirement & HO2 Housing Site Allocations
 - Policy EC12 Leisure, Cultural & Tourism Development

Strategic Growth Options

- 3.3 The details of the refreshed SA of the 4 strategic growth options are provided in Appendix II). The findings of the SA confirm the findings from 2016 [A3 & A3a]: as the level of growth increases, so does the likelihood and potential significance of positive effects for SA objectives relating to the provision of housing, the economy, and health/well-being of the population. It is still considered that the higher growth options 2-4 are more likely to help to meet the affordable housing needs of the borough compared with Option 1. Some uncertainty of effects on employment remains for the higher levels of housing growth.
- 3.4 The Distribution Strategy and percentage apportionment of housing growth to Telford, Newport and the rural areas has not changed, such that minor positive effects remain for all Options with regard to SA objectives for accessibility to services and facilities. Similarly, minor positive effects remain for Options 1-3 with objectives for sustainable transport; the highest quantum of growth in Option 4 could have possibilities for major positive effects but uncertainty remains, Option 1 with lowest growth is less likely to support services, facilities and improvements in sustainable transport. Positive effects for Options 2-3 are confirmed through the Infrastructure Delivery Plan [E3] that remains valid and relevant.

- 3.5 The previous SA had identified some uncertainty with potential negative effects for wastewater and water supply infrastructure for the higher growth options. However, ongoing discussions with the key stakeholders of Severn Trent Water and the Environment Agency have confirmed (May 2017) that improvements in water infrastructure capacity will be planned for and developed over the life of the Local Plan such that there are no issues indicated for the higher housing target of 17,280. Therefore, the likely significant effects for Options 1-3 are reduced to neutral; some uncertainty of minor negative effects on sustainable water management objectives remain for Option 4 with higher growth.
- 3.6 Whilst no significant differences were identified between the Options against SA Objectives relating to biodiversity, the landscape, and the historic environment, it was considered that the potential significance of negative effects increases alongside the level of proposed growth, particularly with regard to cumulative effects. The Local Plan includes strong Policies to protect such environmental assets but there is some uncertainty for the detailed effectiveness of such mitigation measures until lower level studies are undertaken associated with precise site locations.
- 3.7 Overall, the findings of the refreshed SA indicate that the previous SA remains valid and relevant for most SA Objectives. Updated evidence, in particular for water infrastructure, has removed uncertainty and reduced likely significant effects from minor negative to neutral for Options 1-3 against SA Objectives for water. Generally, Options 2-4 are likely to have positive effects for housing, economy, and communities; Options 1-4 may have the potential for cumulative negative effects against SA Objectives for landscape, biodiversity, and the historic environment but mitigation measures are provided through Plan Policies.
- 3.8 The Council has progressed Option 3 into the TWLP Proposed Modifications since this option most closely meets with the reconsidered evidence for the Objectively Assessed Housing Need (OAHN) identified to be 17,280 new homes. Options 1 & 2 were not selected as they would not meet with the identified housing needs. Whilst there are likely positive effects on socio-economic factors identified for the higher growth of approximately 20,000 dwellings in Option 4, this option was not progressed as there could be issues for deliverability including supporting infrastructure in the lifetime of the plan; also, the potential for adverse cumulative effects on landscape, biodiversity and the historic environment are uncertain at the strategic level of assessments. However, there are strong Policies in the plan that will provide mitigation measures.

The TWLP with Proposed Main Modifications (MMs)

Spatial Strategy Policy SP1 Telford (MM8); SP2 (Newport); SP3 (Rural Area) Policy HO1 Housing Requirement (MM37-38) & HO2 Housing Site Allocations (MM39)

- 3.9 As previously explained in Section 1, having reconsidered the OAHN evidence, the Council has revised the housing requirement for the Local Plan

by applying an OAHN of 864 rather than 502. This is equivalent to an increase of 1,725 dwellings to 17,280; these additional dwellings will not be allocated in the TWLP at this stage and the percentage distribution of housing between Telford, Newport and the rural areas does not change. Thus, this approach aligns with the approach presented in the Submission TWLP and previously subject the SA and as set out in the Submission SA Report June 2016 [A3 & A3a] with the findings of the SA for SP1-3 and HO1-2 remaining relevant and valid.

- 3.10 The proposed increases of 100 new homes for each of Policies SP2 & 3 represent relatively small increases and the SA screening found that these changes are unlikely to have any significant effects such that the findings of the SA remain relevant and valid. The increased housing for SP1 Telford is addressed through Policy HO1-2, the strategic Sustainable Urban Extension at Priorslee and the other 11 retained site allocations. The Council will now identify further housing sites to achieve the Local Plan's housing requirement through the preparation of a Housing Sites Allocations Local Plan.
- 3.11 Table 21 in Appendix D of the TWLP sets out the site allocations that progress the housing numbers in HO1-2. The proposed Main Modifications No 92 include the four allocations that have been deleted H1, H7, H8 & H13 to reflect the decision arising from examination discussions and the Inspector's Interim Findings (March 2017) to develop a separate Sites Allocations Local Plan. The sites retained in the strategic TWLP at this stage – H2, H3-6, H9-12, H14-17 all have an extant planning permission or section 7(1) consent – and the previous SA findings remain relevant and valid. The sites assessment method and selection/rejection of site allocation options will be revised; the SA of site options and preferred site allocations will be refreshed or new, as necessary, and undertaken to inform the development of the Sites Allocations Local Plan. The SA will be reported in a document complying with legislative requirements and good practice and will support the Sites Allocation Local Plan on statutory and public consultation.
- 3.12 The increased housing numbers in Policy HO1 are likely to have major long term positive effects on SA objectives for housing through helping to meet the objectively assessed needs of the borough. There is the potential for the higher quantum of development to have negative effects on SA Objectives for services/facilities and other supporting infrastructure, landscape, biodiversity, and the historic environment. However, strong mitigation measures are in place through other plan Policies, including SP4 sustainable development, NE1-7, and COM1-2, such that there will be no residual significant negative effects.
- 3.13 Policy HO2 Housing Site Allocations now only includes one Sustainable Urban Extension at Priorslee; the other urban extension at Donnington & Muxton has been removed from this version of the TWLP. The previous version of the plan relied on Policy SP4 and other Plan Policies to mitigate any potential negative effects and help ensure the likely positive effects of proposed development are implemented. Policy HO2 now includes a list of locationally specific development principles that must be applied to proposed development – and these provide strong mitigation measures that confirm the resolution of

the potential negative effects that had been identified for some parts of the site and previously reported in the Submission SA June 2016 [A3 & A3a Appendix VI IA of Site Options]. It should be noted that this site allocation H2 has complied with development principles and now has planning permission.

- 3.14 Principles for mixed use, mix of densities with range of market and affordable housing, and a broad range of house types, confirm the likely major positive effects previously found for SA Objective Numbers 4 & 5 housing; and positive effects on health/wellbeing and communities SA Numbers 13-16. The Principle for reducing off-site car movements promotes SA Objective Number 9 and is likely to mitigate for previous potential negative effects that had been identified associated with transport and movement. This is further supported by Principles that specify vehicle access, provision of a bus service and other measures to promote alternative modes of transport – all with positive effects that will be synergistic and cumulative in the longer term.
- 3.15 Principles that specify provision of B1 employment, retail, a primary school, recreational facilities and a community centre/space will all have positive effects on SA Objective Numbers 1-3, 9-10, and 11-15 – again, all are likely to be synergistic and cumulative in the longer term. Integration with existing communities is considered by the Principle regarding the interface with housing to the west – providing strong mitigation for potential negative effects. The requirements for improved connectivity to the Sustrans National Cycle Route 81, extensive green infrastructure and enhancement of ecological assets will have major positive effects for SA Objective Numbers 13-14 on health/well-being, and Numbers 18-19 for biodiversity and green infrastructure - synergistic and cumulative in the longer term. This provides mitigation for previously identified potential negative effects.
- 3.16 Principles requiring protection, conservation and, where possible, enhancement of known heritage assets, requirement for an evaluation of archaeological importance of the area provide certainty that there will be no significant negative effects and could be minor positive effects for the historic environment through provision of new information. Avoidance of Flood Zones 2 & 3 together with a commitment to sustainable urban drainage systems ensures mitigation measures for the previously identified potential negative effects on the SA Objective for water Number 8 with residual neutral effects and the possibility for minor positive effects.
- 3.17 Therefore, the Main Modifications proposed for Policy HO2 and Site H2 are overall likely to have positive effects on most objectives for sustainable development. The inclusion of locationally specific requirements provides mitigation and helps ensure that any likely negative effects arising from development are reduced to at least neutral and possibly reverted to minor positive.

Policy EC12 Leisure, Cultural & Tourism Development (MM34 & 36)

- 3.18 The Main Modifications proposed for this Policy comprise additional requirements to ensure that the alignment for the Shrewsbury and Newport Canals is safeguarded with a view to their long-term re-establishment as

navigable waters. This has the potential for positive effects on SA Objectives for the economy, health/well-being, biodiversity, green infrastructure, cultural heritage/historic environment, and sustainable transport – with potential benefits beyond the area of the Borough if the ultimate goal of restoring a continuous navigable waterway linking the Shropshire Union Canal with the River Severn is realised. This is unlikely to be within the lifetime of the Local Plan and such positive effects are indicated for the longer-term. The waterway section of the canal through Newport is designated as a SSSI for biological reasons; its current condition is unfavourable/no change⁵ with the adverse condition associated with fish stocking and invasive species. Policy EC12 protects the alignment of the waterway and Policy NE1 protects important nature conservation and biodiversity assets. Any proposal for restoration would be subject to statutory consultation, including with Natural England, and it is likely that such restoration would improve the condition of the waterway such that the condition of the SSSI would be improved with positive effects for water quality and biodiversity.

Implementation of the TWLP as Modified

- 3.19 Overall, the updated SA including consideration of the Main Modifications proposed has found that the TWLP is likely to continue to have major positive effects for sustainable development objectives for socio-economic factors; these are likely to be more significant and potentially cumulative in the longer-term. Strong mitigation measures are in place through Policies and specific development requirements that will resolve potential negative effects with residual effects to neutral; possibilities also exist to enhance objectives – especially for green infrastructure, sustainable transport and biodiversity with further positive effects that may be synergistic and cumulative in the longer-term. The key change is that this TWLP remains a strategic plan and that the Council will further investigate site allocation options and prepare another Site Allocations Local Plan in due course and to address issues raised during Examination and in regard to the site options assessment method. This will be subject to refreshed and new SA, as necessary, and subject to consultation with the next SA Report accompanying the draft Sites Allocations Local Plan.

HRA, HIA & EqIA

- 3.20 **HRA:** The method and findings of the HRA are presented in detail in a separate report that accompanied the TWLP on submission May 2016 [A4]; summary findings were integrated into the SA Report. It was noted at the time that most of the housing development proposed through the TWLP is either already completed or has planning permission. The HRA screening reported in May 2016 found that the draft Local Plan is not likely to have any significant effects either alone or in-combination on the 8 European sites scoped into the HRA. This was confirmed through consultation with the environmental regulator Natural England who agreed with the findings of the assessment and the conclusion of no likely significant effects⁶.

⁵<https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S1000116&ReportTitle=Newport%20Canal%20SSSI>

⁶ Letter (dated 15 March 2016) from NE (Grady McLean) in response to consultation on the Local Plan Publication Version.

- 3.21 Overall, the increased identified housing requirement is unlikely to have any significant effects as the TWLP has policies to avoid or mitigate potential adverse effects on European sites, including locationally specific requirements in Policy HO2 for the Sustainable Urban Extension H2. Other site allocations have been removed from this plan and will be reconsidered by the Council during preparation of the Sites Allocation Local Plan. This will be subject to HRA and a Report will accompany the draft plan on consultation in the future.
- 3.22 **HIA & EqIA:** Consideration of effects on equality, health and diversity has been made throughout the SA process. All aspects of the Local Plan have been assessed against a SA framework that includes several objectives that directly and indirectly link to equality, health and diversity. Nonetheless, a separate, detailed Report was produced to demonstrate the Council's compliance with the Equality Act 2010 and this can be found in the Submission Integrated Appraisal Report at Appendix VIII (June 2016). The assessment found that all the components of the plan will lead to positive effects on the protected characteristics in the Act with no negative effects being identified. The increased housing proposed in the Main Modifications are not considered to significantly affect the findings of the EqIA and these remain relevant and valid. Positive effects on health and equality are confirmed through meeting the identified housing needs of the borough.

4.0 Conclusions, Consultation & Next Steps

SA Conclusions

- 4.1 The Main Modifications proposed to address issues raised from consultation and discussed at examination have been screened for their significance with regard to SA. The significant changes relate to the increased overall housing requirement and the allocation of housing sites that will now be further addressed in a Sites Allocations Local Plan. A refreshed SA of 4 strategic options for growth has confirmed the findings from submission in 2016 [A3 & A3a]: as the level of growth increases, so does the likelihood and potential significance of positive effects for SA objectives relating to the provision of housing, the economy, and health/well-being of the population. It is still considered that the higher growth options 2-4 are more likely to help to meet the affordable housing needs of the borough compared with Option 1.
- 4.2 Overall, the findings of the refreshed SA indicate that the previous SA remains valid and relevant for most SA Objectives. Updated evidence, in particular for water infrastructure, has removed uncertainty and reduced likely significant effects from minor negative to neutral for Options 1-3 against SA Objectives for water. Generally, Options 2-4 are likely to have positive effects for housing, economy, and communities; Options 1-4 may have the potential for cumulative negative effects against SA Objectives for landscape, biodiversity, and the historic environment but mitigation measures are provided through Plan Policies.
- 4.3 The increased housing numbers in Policy HO1 are likely to have major long term positive effects on SA objectives for housing through helping to meet the objectively assessed needs of the borough. There is the potential for the higher quantum of development to have negative effects on SA Objectives for services/facilities and other supporting infrastructure, landscape, biodiversity, and the historic environment. However, strong mitigation measures are in place through other plan Policies, including NE1-7, COM1-2, and HO2, such that there will be no residual significant negative effects.

Consultation & Next Steps

- 4.4 The Proposed Main Modifications to the TWLP will be placed on statutory and public consultation during August to September 2017. Comments made will be taken into account by the Inspector before finally concluding whether these changes will make the Plan sound. If the modified Plan is found to be sound, it will be adopted as the Local Plan to guide development in the Telford & Wrekin area. An SA Adoption Statement will be prepared to accompany the adopted plan and in line with the requirements of the SEA Regulations.

Appendix I:
Telford & Wrekin Local Plan (TWLP) 2011-2031
Proposed Main Modifications: SA/SEA Screening for Significance

Please note that this matrix includes the Proposed Main Modifications to the Submission TWLP (2011-2031) and as agreed with the Inspector to the Examination. Many of these modifications were previously suggested by the Council and addressed through the SA in the Submission Integrated Appraisal/SA Report June 2016 [A3] and detailed in Appendix XI [A3a]. Significant changes at this stage include the objective assessment of housing needs, the overall housing requirements, and the allocation of housing sites - and as arising from discussions at the Hearings, reported in the Inspector's Interim Note to the Council (March 2017).

MM No.	Summary of Proposed Main Modifications (MMs)	Screening: Do the changes, deletions and additions significantly affect the findings of the SA Report June 2016 [A3 & A3a] accompanying the TWLP Submission and/or do they give rise to significant environmental effects?
1	Potential contribution of in-migration arising from Plan's housing requirement towards meeting the needs of the GBBC HMA has not been quantified & this will be considered by the Council in the light of emerging evidence.	Clarification of future discussions and not significant with regard to the SA as this will depend upon further future evidence.
2 & 3	Addition of second made Neighbourhood Plan – Waters Upton.	Updating and not significant with regard to the SA.
4 & 5	Vision & Objective increased respectively from 198,000 to 202,500 people and	Updating to reflect the uplift arising from the reconsidered OAHN. This is significant with regard to the SA - particularly relevant to strategic options and policy - and is addressed in detail through the refreshed SA of the strategic growth options (Appendix II) and the

	approximately 15,555 to 17,280 new dwellings	Policies SP1 & HO 1 & 2 (please see following MM8, MM37-39 & main text of SA Addendum).
7 & 8	Update key diagram; increase net new homes from 13,400 to 14,950 up to 2031.	Updating of key diagram to correlate with updating of SP1 and HO2 to reflect uplift arising from revised OAHN. This is significant with regard to the SA and the change to the Policies. Overall, the increase in housing is likely to confirm the positive effects found for social and economic SA objectives; there is the potential for cumulative negative effects from the additional development but strong mitigation measures are in place through other Policies in the Local Plan such that there are unlikely to be any adverse significant sustainability or environmental residual effects. Addressed within this SA Addendum Report under MM8 (Policy SP1) and MM37-39 (Policies HO1 & 2).
9 & 10	Increase from 1,200 to 1,300 net new homes for Newport Town.	Updating of SP2 to reflect uplift arising from revised OAHN and based on breakdown of overall requirement set out in Policy HO1. This represents a relatively small increase of 100 homes for this market town and is unlikely to have any significant effects; the findings of the SA remain relevant and valid.
11-14	Increase from approximately 900 to 1,000 net new homes in the rural areas; word changes for clarification & updating	Updating of SP2 to reflect uplift arising from revised OAHN and based on breakdown of overall requirement set out in Policy HO1. This represents a relatively small increase of 100 homes in the rural areas and is unlikely to have any significant effects; the findings of the SA remain relevant and valid.
15-33, 35	Clarification & Updating	Not significant with regard to the SA; the findings of the SA remain relevant and valid.
34, 36	Additional wording to specify safeguarding alignment of the Shrewsbury & Newport Canals and associated structures with a view to the long-term re-establishment as navigable waterways. Restoration of the canal will only be supported if no	The additional wording in Policy EC12 specific to safeguarding the alignment of the canal & associated structures is significant with regard to the SA.

	adverse impacts on natural & historic environment.	
37, 38	Uplift from approximately 15,555 to 17,280 net new homes up to 2031.	Uplift set out in Policy HO1 reflects updated evidence of revised OAHN and is significant with regard to the SA.
39	Housing site allocations amended to reflect the change to the preparation of a Housing Site Allocations Local Plan in the future; Sustainable Urban Extension H1 deleted & H2 specific development requirements provided.	Changes to Policy HO2 are significant with regard to the SA.
40-53	Clarification & Updating	Not significant with regard to the SA; the findings of the SA remain relevant and valid.
54	Additional wording to ensure that any gypsy & traveller sites will be located away from areas of high risk of flooding.	Clarification for Policy HO9 strengthens the mitigation measures against any likely negative effects for SA objective on flood risk; the findings of the SA remain relevant and valid.
55-73	Additional wording, changes and clarification for Policies protecting the environment.	Additional wording for Policies BE-8 set out further specific requirements for development proposals that will confirm strong mitigation measures to ensure no likely significant residual effects on the historic environment. This will remove any uncertainties of effects and effectiveness of mitigation previously identified in the SA findings.
74-81	Additional wording, changes and clarification for Policies regarding minerals planning.	Not significant with regard to the SA; the findings of the SA remain relevant and valid.
82-85	Additional wording, changes and clarification for Policies regarding wastes planning	Not significant with regard to the SA; the findings of the SA remain relevant and valid.
86-8	Additional wording, changes	Not significant with regard to the SA; the findings of the SA remain relevant and valid.

	and clarification for Policies regarding water resources & climate change.	
89-92	Updating appendix with regard to developer contributions for strategic infrastructure; Table 21 revised to delete site allocations H1, H7, H8 & H13.	Changes resolve earlier GIS error and previously addressed by SA in Submission stage. Deletions of H1, H7, H8 & H13 reflect decision arising from examination discussions and Inspector's Interim Findings (March 2017) to develop a separate Sites Allocations Local Plan – and this will have a refreshed and new SA. The sites retained in the strategic TWLP at this stage – H2, H3-6, H9-12, H14-17 all have an extant planning permission or section 7(1) consent – and the previous SA findings remain relevant and valid.
93-95	Additions to Glossary	Not applicable to the SA.

Appendix II:
SA of Strategic Growth Options
Three Options (11,250; 15-16,000; 20,000 new dwellings) - 2015
Four Options (11,250; 15-16,000; 17,280; 20,000 new dwellings) – 2017

Key:

Categories of Significance		
Symbol	Meaning	Sustainability Effect
x	Absolute constraints	Absolute sustainability constraints to development, for example, internationally protected biodiversity
--	Major Negative	Problematical and improbable because of known sustainability issues; mitigation likely to be difficult and/or expensive
-	Minor negative	Potential sustainability issues: mitigation and/or negotiation possible
+	Minor positive	No sustainability constraints and development acceptable
++	Major Positive	Development encouraged as would resolve existing sustainability problem
?	Uncertain	Uncertain or Unknown Effects
0	Neutral	Neutral effect
- ?	It is also possible to have two symbols for an SA Objective. For example, A development could have the potential for a minor negative effect against SA Objective 18 (Biodiversity); however, there is an element of uncertainty until lower level assessments have been carried out.	

SA Objective	Assessment of Effects Nature of the likely sustainability effect (including positive/negative, short - medium term (5-10 years)/long term (10 - 20 years plus), permanent/temporary, secondary, cumulative and synergistic); Uncertainty	Options			
		1	2	3	4
		11,250 new dwellings	15-16,000 new dwellings	17,280 new dwellings	20,000 new dwellings
1. To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups.	All the Options have the potential for a positive long term positive effect on the economy through the provision of housing during the life of the Plan. The higher the level of growth the greater the potential significance of the positive effect and the more likely that there will be enhancements to areas experiencing deprivation and rural isolation. However, evidence suggests that increased levels of housing above 9,940 dwellings would have a marginal impact on the demand and supply of jobs within the borough ⁷ . The current and future predicted circumstances mean that additional residents create little demand for extra jobs and that labour supply is not a constraint to growth. It is therefore considered that there are no significant differences between the options.	+	+	+	+
2. To reduce the number of people with difficulties accessing employment, education and training opportunities.	Initial evidence suggested that increased levels of housing above 9,940 dwellings will have a marginal impact on the demand and supply of jobs within the borough ⁸ . The current and future predicted circumstances of the borough mean that additional residents create little demand for extra jobs and that labour supply is not a constraint to growth. The Final Objectively Assessed Needs Report (2015) states that providing extra resident workers by itself is unlikely to result in a commensurate number of extra jobs. To be able to absorb these extra workers a positive economic development strategy to increase job growth would be required along with a reduction in net in-commuting. The OAN Final Report goes on to say that if additional housing land is provided but there are no more jobs it may be that the land is not taken up, because demand is restricted by lack of local jobs. Alternatively, if demand is forthcoming and the additional housing is provided, many of the occupiers may be out-commuters, who travel to jobs in Greater Birmingham for example.	+	?	?	?

⁷ Telford & Wrekin Council (2015) Telford & Wrekin Objectively Assessed Housing Need Final Report

⁸ Ibid.

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	<p>It is clear that there are a number of assumptions and uncertainties when it comes to the level of housing growth and how it will impact the number of jobs. The available evidence suggests that the higher levels of growth will not significantly improve the number of jobs available in the borough and that the demand for jobs could exceed the available supply resulting in increased levels of out-commuting. This could make it difficult for future residents to access employment within the borough with long term negative effects on this SA Objective. There is an element of uncertainty for all the options given the findings of the available evidence. This uncertainty increases along with the level of growth as according to the OAN Final Report, there would need to be major changes in the local factors that drive economic performance. It is therefore considered that the lowest level of growth proposed through Option 1 has the least uncertainty and therefore at this stage is more likely to have a minor positive effect against this SA Objective.</p> <p>This SA Objective also relates to accessibility to education and training facilities. All the options have the potential to increase pressure on existing as well as support existing education and training facilities. Overall, they are likely to have long term positive effects as they will support the expansion of existing facilities as well as the provision of new ones. The higher the level of growth the greater the pressure on existing services as well as the greater potential for the expansion of existing and provision of new facilities. The higher level growth options 2, 3 & 4 could help improve accessibility to education and training for rural communities as there would likely be a higher level of growth in these areas. The significance of such positive effects remains uncertain.</p>				
3. To ensure an appropriate supply of employment land and starter business premises.	It is considered that none of the options are likely to significantly positively or negative effect the supply of employment land. The higher levels of growth could potentially reduce the amount of land available for employment; however, this is uncertain at this stage. Potential for a neutral effect for all site options.	0	0	0	0
4. Improve the supply and affordability of	While this SA Objective mainly deals with the affordability of housing, it is considered appropriate that the appraisal also considers the quantity of housing against this	++?	++?	++?	++?

SA Objective	Assessment of Effects	Options			
		1	2	3	4
accommodation for all groups in areas of greatest need.	<p>Objective.</p> <p>The Telford & Wrekin Objectively Assessed Housing Need Final Report (2015) identified the overall need for housing in the borough to 2031⁹. The report identified a need for 497 net new dwellings per annum (dpa), which is equal to 9,940 dwellings over the life of the plan. Based on the evidence, all the options would meet the objectively assessed need for housing during the life of the plan with the potential for major long term positive effects against this SA Objective.</p> <p>The SHMA¹⁰ and OAN¹¹ Final Reports identify that the borough has a high level of need for affordable housing. If housing sites are provided in line with the identified OAN of 9,940 dwellings, the affordable delivery will fall far short of the identified need¹². Providing a higher housing target is not necessarily the solution as providing land far in excess of market demand could result in some of that land not being taken up and reduce viability. The OAN Final Report suggests that the Council should look for realistic opportunities to attract market demand and build housing over and above the interim OAN. Taking this evidence into account, it is considered more likely that Options 2, 3 & 4 will help to meet the high affordable housing needs of the borough compared to Option 1. However, at this stage this is uncertain.</p>				
5. Locate housing in areas with good accessibility to employment, services and amenities.	<p>It is assumed that development as a result of any of the options would adhere to the spatial strategy set out in the Draft Local Plan, which focuses development within Telford and then Newport, with enough development in the rural areas to meet identified needs. The higher the level of growth the greater the amount of development that is likely to be delivered in rural areas, further away from employment and services/facilities. However, there will also be a higher level of provision within the main settlements of Telford and Newport with good accessibility. There is the potential that the higher levels could be more likely to provide new employment opportunities and services/facilities in the rural areas but at this stage this is uncertain. Ultimately, it is considered unlikely that there would be any</p>	+	+	+	+

⁹ Ibid.

¹⁰ Telford & Wrekin (2014) Strategic Housing Market Assessment Final Report.

¹¹ Telford & Wrekin Council (2015) Telford & Wrekin Objectively Assessed Housing Need Final Report.

¹² Ibid.

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	significant differences between any of the site options, potential for a minor short to long term positive effect.				
6. To deliver continued reduction in the quantities of waste being generated and the quantities being disposed of at landfill.	<p>All the options are likely to increase waste in the short (construction) and long-term (operation and decommissioning). Draft Local Plan Policies ER 8 & 9 which set out a framework for integrating waste management into new residential, commercial, retail and industrial development through the provision of safe and accessible locations to store waste as well as convenient locations for its collection. Policy ER 8 expects developers to demonstrate how construction and excavation waste from development sites will be recycled, treated and/or disposed of and Policy ER 7 seeks to ensure that there is the provision of a range of waste management facilities to meet the needs of the public and private sectors.</p> <p>It is considered that there will be sufficient mitigation provided through Local Plan policies and available at the project level to ensure any significant negative effects are addressed with a neutral residual effect against this SA Objective. The higher the level of growth the more likely to result in increased levels of waste generated. However, once mitigation has been taken into account it is considered that there are no significant differences in the nature and significance of sustainability effects between the Options against this SA Objective. However, updated evidence (May 2017) confirms the additional quantity of wastes arising from the increase to 17,250 dwellings could easily be accommodated in the existing waste management facilities that are available, indicating neutral effects for Options 1-3.</p>	0	0	0	0?
7. To reduce the quantities of primary aggregate required for building and infrastructure projects by maximising the use of secondary aggregates as well as to protect mineral resources from sterilisation.	<p>All the options will result in the use of primary aggregates for building and infrastructure. The higher the level of growth the greater the quantity of primary aggregates that are likely to be required and used. Despite this, all the options have the same potential to maximise the use of secondary aggregates as well as use sustainable construction techniques. It is also assumed that the higher the level of growth, the greater the likelihood that development could result in the sterilisation of mineral resources; however, at this stage this is uncertain.</p> <p>To reflect the likelihood that a greater quantity of primary aggregates will be used it is considered that Options 2, 3 & 4 have the potential for a minor short to long term negative effect against this SA Objective. There is an element of uncertainty against Option 2 & 3 in recognition that the negative effect is likely to be of less significance</p>	?	- ?	- ?	-

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	than that of Option 4.				
8. To minimise demand upon water resources and to enable the timely provision of adequate waste water treatment to support increased housing provision.	<p>The available evidence, including the Severn Trent Water Resource Management Plan (WRMP)¹³ and Detailed Water Cycle Study¹⁴ (WCS), indicate that there are existing and future constraints with regard to water resources. The borough primarily falls within the Shelton Water Resource Zone (WRZ) and Whitchurch and Wren WRZ. The Severn Trent Water Resource Management Plan (WRMP) identifies that the supply in the Shelton WRZ is due to decline in 2024/25 in response to license revocations to meet environmental (river) flow requirements. The River Worfe and some of its tributaries are impacted by low flows, principally caused by over-abstraction of the underlying aquifer for public supply.</p> <p>The WRMP seeks to address this issue and increase the volume of water available for supply through a number of measures, which include pipeline upgrades to transfer additional water from the west part of the Shelton zone to the east and increasing abstraction at the Uckington borehole. However, it should be noted that this is dependent on ongoing discussion with the EA as it would involve increased groundwater abstraction from an area where groundwater is already over licenses and over abstracted. The Detailed WCS produced by the Council states that a secure supply-demand balance also depends on demand not exceeding the forecasted level of growth within the WRMP.</p> <p>All the options have the potential for long term negative effect on this SA Objective through increased levels of abstraction. Telford is one of just three main urban areas in the Shelton WRZ; therefore, its growth rates have the potential to affect the balance between supply and demand. The Detailed WCS took into consideration a level of growth of around 20,000 new homes during the life of the Local Plan. The WCS made a number of recommendations which includes that per capita consumption across the borough needs to be effectively managed to a level of around 110 litres per person per day.</p>	0	0	0	-?

¹³ Severn Trent Water (2014) Final Water Resource Management Plan. Available online: <http://www.severntrent.com/future/future-plans-and-strategy/water-resources-management-plan>

¹⁴ Telford and Wrekin Council (2014) Detailed Water Cycle Study Final Report.

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	<p>At this stage the Draft Local Plan does not incorporate this recommendation, with Policy ER 10 (Water conservation and efficiency) not seeking to go further than the currently required 125 litres per person per day in the Building Regulations. It is therefore considered that Option 4 has the potential for a major cumulative negative effect against this SA Objective. If the Draft Local Plan were to require that water consumption is managed at 110 litres per person per day then the significance of the negative effect against Option 4 is likely to be reduced.</p> <p>The lower level of growth proposed through Options 2 & 3 is likely to reduce the significance of potential negative effects. It is therefore considered at this stage, that there is suitable mitigation available to ensure that there will not be any major negative effects on water resources. However, there is still the potential for residual long term minor negative effects. If the Local Plan were to incorporate the WCS recommendation that water consumption is managed at 110 litres per person per day then the significance of this effect could potentially be reduced further.</p> <p>The lower level of growth proposed through Option 1 is likely to reduce the significance of potential negative effects even further. It is therefore considered at this stage, that there is suitable mitigation available to ensure that there will not be any negative effects of any significance on water resources, potential for a residual neutral effect. There is an element of uncertainty for all the options in recognition of the assumptions and uncertainties that are highlighted within the Severn Trent WRMP as well as the Detailed WCS.</p> <p>The Detailed WCS¹⁵ concluded that wastewater treatment capacity is the main environmental and infrastructure constraint to growth in the plan area. Telford is the main focus for growth in the borough during the life of the plan. This will result in most development falling within the catchments for the Coalport and Rushmoor WwTWs. The evidence suggests that there is capacity across the existing WwTWs serving towns in the borough to support all the Options; however, this capacity does not align with the spatial strategy set out in the Draft Local Plan. It should be noted that through the work undertaken for the Detailed WCS, Severn Trent Water confirmed that there</p>				

¹⁵ Ibid.

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	<p>will be capital maintenance work and, as required, capacity increase at WwTWs to cater for future growth¹⁶.</p> <p>In Line with Draft Local Plan Policy ER 11, it is assumed that the levels of growth proposed by the Options can be appropriately phased to allow Severn Trent Water and other statutory undertakers to incorporate improvements into Asset Management Plans delivering key infrastructure in advance of development. Taking existing regulatory processes into account, such as discharge licensing, along with available mitigation measures, it is considered that none of the options are likely to have significant negative effects on WwTWs. It should be noted that the level of uncertainty and potential for negative effects increase as the level of housing growth increases.</p> <p>Continuing discussions between the Council, Severn Trent Water & the Environment Agency indicate that the updated WCS (2015) remains a robust evidence base and no concerns were raised regarding the approach taken to a higher housing target¹⁷¹⁸. The capacity of the Coalport WwTW will be improved to meet with demand in the short to medium term as part of the Asset Management Planning (AMP) process. The emerging WRMP is planning for water supply improvements that will accommodate development commitments & proposed allocations. Any subsequent site allocations may then require updated evidence at that time – this plus the ongoing discussions with the relevant stakeholders provide mitigation measures, including appropriate phasing and delivery, that are likely to reduce the potential minor negative effects for Options 2 & 3 to residual neutral effects in the longer term. Some uncertainty remains over the cumulative minor negative effects on sustainable water management for Option 4 in the longer term.</p>				
9. To make travel more reliable and efficient, as well as	This SA Objective primarily relates to sustainable travel. All the options have the potential for long term positive effects through improved access to housing and associated services/facilities, which includes health, education and leisure. This along	+	+	+	++?

¹⁶ Ibid.

¹⁷ Environment Agency (May2017) Post Examination Matters in Relation to the Telford &Wrekin Local Plan

¹⁸ Severn Trent Water (May 2017) Email confirming no issues regarding higher housing target of 17,280

SA Objective	Assessment of Effects	Options			
		1	2	3	4
enhance access to jobs, education, healthcare, shops and leisure.	<p>with improvements to and the provision of new sustainable transport modes, including public transport and walking and cycling routes will have positive effects against this SA Objective.</p> <p>The Draft Local Plan focuses proposed development in Telford and Newport where the majority of facilities/services and employment opportunities are located within the borough, which has the potential for positive effects on accessibility. It is important to note that Telford, as a new town, was originally designed for car rather than public transport use. There is poor bus penetration into some of the strategic employment areas, such as Horton Wood, and accessibility by public transport modes from the residential estates in the south to employment and key services in the north, such as the Princess Royal Hospital, is poor. The hub and spoke bus network means that residents often need to change buses in the Town Centre to access employment and key services on the fringes of the Town. The higher the level of proposed growth the greater potential there is to try and improve sustainable transport connections through Telford as well as Newport and the rural areas.</p> <p>It is considered that all the Options have the potential for a long term positive effect against this SA Objective. There is an element of uncertainty against Option 1 to reflect that it may not provide the same level of improvements as the higher level of growth proposed through Options 2 & 3; it is assumed that the higher the overall growth, the greater the opportunity for major positive effects although some uncertainty remains at the strategic level of assessment.</p>				
10. To work with other service providers to enable the timely provision of community facilities to accord with the delivery of new houses.	<p>All the options have the potential to increase pressure on existing as well as support existing or provide new community facilities. Overall, they are likely to have long term positive effects as they will support the expansion of existing facilities as well as the provision of new ones. The higher the level of growth the greater the pressure on existing services as well as the greater potential for the expansion of existing and provision of new facilities.</p> <p>The higher the level growth, the more likely to have a positive effect that is of more significance, as there is the potential for a greater provision of new community facilities, particularly in the rural areas. It is assumed that Option 4 would provide the greatest level of improvements in terms of accessibility to community facilities,</p>	+	+	++	++

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	potential for a major long term positive effect. Option 2 proposes a lower level of growth, so it is therefore assumed that it will have a slightly reduced positive effect compared to Option 3. While Option 1 also has the potential for a long term positive effect there is also an element of uncertainty to reflect that it may not provide the same level of community facilities as the higher level of growth proposed through Options 2 - 4.				
11. To achieve a population profile in balance with the employment opportunities that the travel to work area is able to provide.	<p>The appraisal rationale for this SA Objective relates to moderating the levels of inward and outward commuting. Evidence suggests that increased levels of housing above 9,940 dwellings will have a marginal impact on the demand and supply of jobs within the borough¹⁹. The current and future predicted circumstances of the borough mean that additional residents create little demand for extra jobs and that labour supply is not a constraint to growth. The Final Objectively Assessed Needs Report (2015) states that providing extra resident workers by itself is unlikely to result in a commensurate number of extra jobs. To be able to absorb these extra workers a positive economic development strategy to increase job growth would be required along with a reduction in net in-commuting. The OAN Final Report goes on to say that if additional housing land is provided but there are no more jobs it may be that the land is not taken up, because demand is restricted by lack of local jobs. Alternatively, if demand is forthcoming and the additional housing is provided, many of the occupiers may be out-commuters, who travel to jobs in Greater Birmingham for example.</p> <p>It is clear that there are a number of assumptions and uncertainties when it comes to the level of housing growth and how it will impact the number of jobs. The available evidence suggests that the higher levels of growth will not significantly improve the number of jobs available in the borough and that the demand for jobs could exceed the available supply resulting in increased levels of out-commuting, which could have long term negative effects against this SA Objective.</p> <p>There is an element of uncertainty for all the options given the findings of the available evidence. This uncertainty increases along with the level of growth as according to the OAN Final Report, there would need to be major changes in the</p>	+	?	?	?

¹⁹ Telford & Wrekin Council (2015) Telford & Wrekin Objectively Assessed Housing Need Final Report.

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	local factors that drive economic performance. It is therefore considered, at this stage, that the nature and significance of the effects of the higher levels of growth proposed through Options 2, 3 and 4 are uncertain. As the level of growth decreases so does the level of uncertainty. Option 1 is therefore considered to have a minor positive effect at this stage, with an element of uncertainty as for the other Options. At the strategic stage available evidence suggests that it is the most likely to manage levels of inward and outward commuting.				
12. To provide an environment that helps retain well-educated members of the work force.	<p>The nature and significance of the effect against this SA Objective is closely linked to the appraisal against SA Objective 11. Available evidence suggests that as the level of growth increases so does the potential for out-commuting unless there are major changes in the local factors that drive economic performance. If the number of employment opportunities does not keep up with the supply of housing then it is likely that well-educated members of the work force may move or be forced to commute outside the borough for employment.</p> <p>There is an element of uncertainty for all the options given the findings of the available evidence. This uncertainty increases along with the level of growth as according to the OAN Final Report, there would need to be major changes in the local factors that drive economic performance. It is therefore considered, at the strategic stage, that the nature and significance of the effects of the higher levels of growth proposed through Options 2, 3 and 4 are uncertain. As the level of growth decreases so does the level of uncertainty. Option 1 is therefore considered to have a minor positive effect at this stage, with an element of uncertainty as for the other Options.</p>	+	?	?	?
13. To improve the health and well-being of the population to meet the needs of the vulnerable and ageing population.	<p>All the options have the potential for short term negative effects on human health through the provision of housing. Increased noise, light and air pollution during construction can have impacts on human health. It is assumed that there will be suitable mitigation measures provided through Local Plan policies and available at the project level to address short term negative effects to ensure that they are not significant during construction, with a residual neutral effect.</p> <p>The higher the level growth, the more likely to have a positive effect that is of more significance, as there is the potential for a greater provision of homes to meet the needs of an ageing population as well as new health facilities. There is also the</p>	+	+	++	++

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	<p>potential for a greater level of improvements to existing walking and cycling routes as well as the provision of new routes within the borough, particularly within Telford and Newport. The higher level growth options are also more likely to have a positive effect of more significance for rural communities in terms of improving accessibility to homes and health facilities.</p> <p>It is assumed that Options 3 & 4 would provide the greatest level of improvements in terms of accessibility to homes and health facilities, compared to the other options there is the potential for a major long term positive effect. Option 2 proposes a lower level of growth, so it is therefore assumed that it will have a slightly reduced positive effect compared to Option 3. While Option 1 also has the potential for a long term positive effect there is also an element of uncertainty to reflect that it may not provide the same level of homes and health facilities as the higher level of growth proposed through Option 2.</p>				
14. To create opportunities for the community to reduce levels of obesity.	<p>The appraisal rationale for this SA Objective relates to the provision of local recreational areas. The higher the level growth, the more likely to have a positive effect that is of more significance, as there is the potential for a greater provision of local recreational areas as well as improvements to walking and cycling routes.</p> <p>It is assumed that Options 3 & 4 would provide the greatest level of improvements in terms of accessibility to local recreational areas, compared to the other options there is the potential for a major long term positive effect. Option 2 proposes a lower level of growth, so it is therefore assumed that it will have a slightly reduced positive effect compared to Option 3. While Option 1 also has the potential for a long term positive effect there is also an element of uncertainty to reflect that it may not provide the same level of homes and health facilities as the higher level of growth proposed through Option 2.</p>	+	+	++?	++
15. To enable vulnerable people to live independently.	<p>The higher the level growth, the more likely to have a positive effect that is of more significance against this SA Objective, as there is greater potential for the provision of homes care homes and specialist services for the elderly as well as those suffering from dementia and mobility difficulties. The highest levels of growth, Options 3 & 4 have the greatest potential to improve access to care homes and specialist services. Compared to the other Options 1 & 2 there is the potential for a major long term positive effect; some uncertainty of major significance for the relatively lower level of</p>	+	+	++?	++

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	growth with Option 3. Option 2 proposes a lower level of growth, so it is therefore assumed that it will have a slightly reduced positive effect compared to Option 3 – and still some uncertainty. While Option 1 also has the potential for a long term positive effect there is also an element of uncertainty to reflect that it may not provide the same level of homes and health facilities as the higher level of growth proposed through Option 2.				
16. To ensure urban design and layout contributes towards reducing the potential for crime.	None of the Options are likely to have a significant effect against this SA Objective. It is assumed that the design and layout of new development could incorporate Secured by Design Standards.	0	0	0	0
17. To ensure the protection of the Weald area of peats from development and human activities so that their carbon storage value is not degraded.	The spatial strategy focuses the majority of development towards Telford and Newport. This will help to avoid development within the Weald Moors to some extent; however, at this stage this is unknown. The nature and significance of the effect against this SA Objective is considered to be uncertain for all the Options at this stage as it will be dependent on the precise location of development.	?	?	?	?
18. To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.	<p>All the options have the potential for negative effects on biodiversity; however, the significance of the effect is ultimately dependent on the precise location of new development and sensitivity of receptors.</p> <p>The higher levels of growth are likely to lead to a greater loss of greenfield land; however, the importance of these areas with regard to biodiversity is not known at this stage. Development also presents opportunities to improve the provision of Green Infrastructure and could potentially help to improve habitat connectivity across the borough; however, this is uncertain at this stage. It is assumed at this stage that the mitigation provided through Local Plan policies and available at the project level will ensure that there are no significant negative effects on biodiversity as a result of any of the Options.</p> <p>Given the findings of the appraisal against SA Objective 8, it is possible that the higher levels of growth proposed through Options 2, 3 and 4 could potentially have</p>	?	- ?	- ?	- ?

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	negative effects on water dependent biodiversity. To reflect this it is considered that there is the potential for a minor long term negative effect on biodiversity. There is an element of uncertainty for all the options as the nature and significance of the effects, especially cumulative effects, will ultimately be dependent on the precise location of new development, the sensitivity of receptors and the precise effectiveness of site specific mitigation measures. Policies NE1 & NE2 provide strong protection for biodiversity such that major significant effects will be mitigated.				
19. To deliver the quantity and quality of green infrastructure to help to maintain Telford & Wrekin as a good place to live and work and also to contribute to the health and wellbeing of the local population.	<p>All Options have the potential to result in the loss of green infrastructure (GI) through the provision of housing; however, the quality and quantity that may be lost is unknown at this stage. Focussing development in the urban areas of Telford and Newport could lead to the redevelopment of previously developed land which could bring previously inaccessible spaces into public access. Development at the edge of urban spaces through urban extensions and strategic allocations can increase access to Green Infrastructure and facilitate the connectivity between countryside and urban areas. However, it can also potentially erode access for existing development at the edge of settlements.</p> <p>It is assumed that any development will be required to provide an appropriate level of open space for recreation and protect and enhance GI. While the options will inevitably result in the loss of greenfield land and some GI, development also has the potential to potential enhance the quality and provision of GI. In particular it can help to enhance the integrated network and improve connectivity. Potential for a minor long term positive effect for all the Options. There is an element of uncertainty for all the options until further lower level assessments have been carried out. However, the progress with updating the Green Network²⁰ includes additional functions for protection and enhancement of habitats and green areas with mapped ecological networks. This should help provide mitigation measures that could be particularly effective for considering the cumulative effects of higher quanta of development growth.</p>	+	+	+	+
20. To manage the landscape effects of	All the options have the potential for long term negative effects on the landscape and these may be cumulative. The current spatial strategy, as set out in the Draft	- ?	- ?	- ?	-

²⁰ Technical Paper Green Network (January 2016)

SA Objective	Assessment of Effects	Options			
		1	2	3	4
development in recognition of European Landscape Convention.	<p>Local Plan focuses housing development primarily within and around the main towns of Telford and Newport, which will help to reduce the significance of the effect to some extent; however, this is dependent on the precise location of development and sensitivity of receptors.</p> <p>While Local Plan policies are likely to provide suitable mitigation to address significant negative effects this assumption becomes more uncertain for the higher levels of proposed growth, in particular for Option 4. Given the mitigation that is likely to be provided through Local Plan policies and available at the project level it is assumed that there will not be any significant negative effects as a result of any of the Options. There is still the potential for minor long term residual negative effects on the landscape as a result of the level of development proposed through the Options. It is considered that there is less uncertainty with regard to the potential minor long term residual effects for Option4 given the higher level of growth. Policies NE2, 6 & 7 provide strong protection for landscape such that major significant effects will be mitigated.</p>				
21. To enhance, conserve and protect buildings, sites, and the setting of historic assets to the urban environment as part of development projects.	<p>All the options have the potential for long term negative effects on the historic environment; however, the significance of this effect is dependent on the precise location of development and sensitivity of receptors. It is considered that there is suitable mitigation provided through Draft Local Plan policies and available at the project level to address significant effects with the potential for residual minor short to long term negative effects. There is still an element of uncertainty until lower level assessments have been carried out; however, the Plan seeks to protect and enhance the Borough's heritage assets having regard to policies that provide mitigation measures²¹; further mitigation is provided through Policies BE1-8</p> <p>While it is recognised that impacts on landscape could have negative effects on the setting of heritage assets at this stage it is considered uncertain. While Local Plan policies are likely to provide suitable mitigation to address significant negative effects this assumption becomes more uncertain for the higher levels of proposed growth, in</p>	-?	-?	-?	-

²¹ Technical Paper Historic Environment (January 2016)

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	<p>particular for Option 4. Given the mitigation that is likely to be provided through Local Plan policies and available at the project level it is assumed that there will not be any significant negative effects as a result of any of the Options.</p> <p>There is still the potential for minor long term residual cumulative negative effects on the landscape as a result of the level of development proposed through the Options. It is considered that there is less uncertainty with regard to the potential minor long term residual effects for Option 4 given the higher level of growth.</p>				
22. To reduce annual CO2 emissions by 60% from 1990 levels, by 2050 (36% by 2026).	<p>All the Options have the potential to negatively affect this SA Objective through increased atmospheric pollution (as a result of increased traffic and road users) and an increase in energy supply and demand (relating to energy from unsustainable sources both in construction and operation).</p> <p>The Council has carried out a range of transport modelling to determine how traffic patterns and problems in the borough, particularly in Telford, are likely to change over the next 20 years. The findings of the further transport modelling are presented in the Shaping Places Report (Feb 2015), which considered a housing target of approximately 20,000 new homes during the plan period. This was made up of around 10,000 dwellings that have already been committed and an additional 10,000 proposed units. The modelling work found that the trips from committed developments which have already been granted planning permission are likely to have a significant impact on the highway network. The modelling identified network performance issues from the cumulative impact of 10,000 committed units and 10,000 proposed new homes if improvements are not carried out.</p> <p>The Council is seeking a plan rather than project level approach to address the impacts of development on the highways network, which will help to ensure that the cumulative impact of all the development proposed is appropriately addressed. This is in line with the Telford & Wrekin Local Transport Plan²², which seeks to employ a plan led approach for new developments to mitigate any transport impacts. To help</p>	0?	0?	0?	0?

²² Telford & Wrekin Council (2011) Local Transport Plan 2011-2026.

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	<p>guide this approach, the Council has developed a Shaping Places Transport Mitigation Strategy, which sets out the strategic impact of proposed development on the transport system and proposes different ways to mitigate the potential impact²³. The foundation of the mitigation strategy is pooled contributions, which aims to facilitate ease of delivery while mitigating the potential impacts on the highway infrastructure in a fair and reasonable way.</p> <p>It is considered that the mitigation strategy proposed, which includes the contributions strategy as well as Draft Local Plan Policies, should ensure that there are no significant negative effects on the highway network as a result of any of the proposed Options. In the long term it is assumed that greenhouse gas emissions from vehicles will reduce as a result of stringent emission controls on new vehicles via Euro standards; however, at this stage this is uncertain.</p> <p>All the Options are likely to have negative effects against this SA Objective through the embodied energy inherent in the construction and maintenance of development. Processing methods and technologies are likely to reduce the amount of embodied energy used in the future; however, this is uncertain at this stage. All the Options also have the potential to incorporate energy and efficiency measures as well as renewable or low carbon energy.</p> <p>It is considered that all the Options are likely to have a neutral effect against this SA Objective; however, it is recognised that there is still an element of uncertainty which is dependent on implementation. It is considered that there are no significant differences in the nature and significance of sustainability effects between the Options.</p>				
23. To deliver a built environment that is well adapted to cope with the changing weather conditions that are forecast.	All new development, people and communities can be made resilient to the effects of extreme weather. Para 99 of the NPPF states that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. There are no significant differences between the Options, potential for a neutral effect against this SA Objective.	0	0	0	0

²³ Prepared by Pell Frischman on behalf of Telford & Wrekin Council (Feb 2015) Telford Future – Shaping Places. Shaping Places Report. Draft Final.

SA Objective	Assessment of Effects	Options			
		1	2	3	4
24. Incorporate measures into development proposals that contribute towards a reduction in flood risk aimed at providing a runoff rate less than greenfield rates.	It is considered that there will be suitable mitigation provided through Local Plan policies and available at the project level to ensure that there are no significant negative effects against this SA Objective. In accordance with the NPPF, Draft Local Plan policies seek to ensure that development is directed away from areas of flood risk and that it does not increase the risk of flooding. Therefore, neutral residual effect against this SA Objective. No significant difference between the options. The updated Strategic Flood Risk Assessment (SFRA2), in conjunction with the Local Flood Risk Management Strategy, 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 ²⁴ . As sites are brought forward, they will be assessed to ensure that their allocation can be justified regarding flood risk. Therefore, neutral effects are still predicted for all options.	0	0	0	0
<p>Summary Findings:</p> <p>The appraisal found that as the level of growth increases so does the likelihood and potential significance of positive effects against SA Objectives relating to the provision of housing and the economy. All the options would help to meet the housing needs of the borough, which is identified in the Council's Objectively Assessed Housing Need (OAHN) Final Report as 9,940 dwellings during the life of the Plan (representing a housing target of 15,555 for commitments & allocations), and updated in May 2017 to a higher housing target of 17,280. Options 3 & 4 were considered the most likely to have major positive effects on SA Objectives relating to the provision of housing for the elderly and vulnerable people given the higher level of proposed growth. These options were also considered more likely to have greater positive effects against SA Objectives relating to sustainable transport and the provision of facilities/services.</p> <p>The OAHN Final Report suggests that increased levels of housing above 9,940 dwellings will have a marginal impact on the demand and supply of jobs within the borough. The current and future predicted circumstances of the borough mean that additional residents create little demand for extra jobs and that labour supply is not a constraint to growth. Higher levels of housing growth could mean that the demand for jobs could exceed the available supply in the future resulting in increased levels of out-commuting. This could make it difficult for future residents to access employment within the borough, increasing levels of out-commuting as well as losing well-educated members of the workforce. As all the options are above the 9,940 dwellings proposed in the OAHN Final Report, there is an element of uncertainty for all them. This uncertainty increases along with the level of growth as according to the evidence, there would need to be major changes in the local factors that drive economic performance. It is therefore considered that the lowest level of growth proposed through Option 1 has the least uncertainty and therefore at this stage is more likely to have a minor positive effect against SA Objectives relating to the economy and employment.</p>					

²⁴ Environment Agency (May2017) Post Examination Matters in Relation to the Telford &Wrekin Local Plan

SA Objective	Assessment of Effects	Options			
		1	2	3	4
	<p>The earlier available evidence indicated existing and future constraints with regard to water resources as well as waste water infrastructure. However, ongoing discussions with the key stakeholders of Severn Trent Water and the Environment Agency have confirmed (May 2017) that improvements in water infrastructure are being planned for such that there are no issues indicated for the higher housing target of 17,280. Therefore, the likely significant effects for Options 1-3 are reduced to neutral; some uncertainty of minor negative effects on sustainable water management objectives remain for Option 4 with higher growth.</p> <p>The significance of the negative effect reduces as the level of growth decreases.</p> <p>While there are no significant differences identified between the Options against SA Objectives relating to biodiversity, the landscape and the historic environment, it was considered that the potential significance of negative effects increases alongside the level of proposed growth, particularly with regard to cumulative effects. The Local Plan includes strong Policies to protect such environmental assets but there is some uncertainty for the detailed effectiveness of such mitigation measures until lower level studies are undertaken associated with precise site locations.</p>				