

Telford & Wrekin Council
Environment & Planning Policy
PO Box 457
Telford
TF2 2FH

Our ref: SV/2012/106308/CS-
05/SB1-L01

Your ref:

Date: 21 September 2017

Dear Sir/Madam

Examination of the Telford & Wrekin Local Plan – Consultation on the Proposed Main Modifications

I refer to your email of the 31 July 2017 in relation to the proposed modifications to the Telford & Wrekin Local Plan. I would offer the following comments for your consideration at this time.

The Schedule of Proposed Main Modifications primarily relate to matters outside of the Environment Agency remit although we note the focus on housing numbers, and the need for a separate Site Allocations Local Plan.

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.”

We would raise no concerns with the approach proposed in the Modifications, specifically within Policy HO2 (Housing Site Allocations). Both the Strategic Flood Risk Assessment (SFRA) and the Water Cycle Study (WCS), in their current state, provide a robust evidence base to support the allocations within the Local Plan in its current guise. Any subsequent site allocations outside of the current Plan, i.e. within the required Site Allocations Local Plan, will then need to be supported by updated evidence to support them. We will engage in further discussions with Telford & Wrekin Council at such a time to ensure that any such evidence is similarly robust and sound.

With regard to Policy HO9 (Ref: MM54) we note the inclusion of a paragraph stating that the site is to be located away from areas at high risk of flooding. Similarly we welcome reference to the updated Climate Change Guidance and the need to contact the local Environment Agency offices for area specific data. This guidance will also need to be considered in the abovementioned SFRA evidence base to support any forthcoming

M24 - Environment Agency
Site Allocations Plan.

Yours faithfully

Mr. Graeme Irwin
Senior Planning Advisor

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