



Telford & Wrekin Council

Local Plan

2011 - 2031

Consultation Statement



Telford & Wrekin
COUNCIL

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1 Introduction

1.1 This statement describes how the Council has undertaken community participation and stakeholder involvement to in the lead up to producing the Telford & Wrekin Local Plan Publication Version (the Regulation 19 version).

1.2 Regulation 17 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (the Local Planning Regulations) specifically obliges the Council to prepare a statement setting out:

- which bodies and persons were invited to make representations under Regulation 18 of the Local Planning Regulations;
- how those bodies were invited to make representations;
- a summary of the main issues raised by those representations; and
- how those main issues have been addressed in the Local Plan.

1.3 Regulation 18 (below) specifies the consultation the Council must undertake at the Regulation 18 stage before it can proceed to publish a Publication version of the Local Plan (under Regulation 19).

Regulation 18

"18.- (1) A local planning authority must-

(a) notify each of the bodies or persons specified in paragraph (2) of the subject of a local plan which the local planning authority propose to prepare, and

(b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain.

(2) The bodies or persons referred to in paragraph (1) are-

(a) such of the specific consultation bodies as the local planning authority consider may have an interest in the subject of the proposed local plan;

(b) such of the general consultation bodies as the local planning authority consider appropriate; and

(c) such residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations.

(3) In preparing the local plan, the local planning authority must take into account any representation made to them in response to invitations under paragraph (1)."

1.4 This Consultation Statement also highlights how the Council has met the requirements of the Statement of Community Involvement (SCI), which was adopted in December 2012.

1.5 The Council has carried out three previous rounds of consultation. These covered:














- Early Engagement - January to March 2011
- Strategy & Options - April to May 2013
- Proposed Housing & Employment Sites - June to August 2014

1.6 The Council has developed an extensive database of resident consultees as a result of previous stages of engagement. The database also covers a number of specific and general consultation bodies (refer Appendix A).

2 Relationship to Telford & Wrekin Council Statement of Community Involvement (SCI)

Involvement (SCI)

2.1 The Council's Statement of Community Involvement (SCI) was adopted in December 2012. It outlines who should be consulted at each stage of the Local Plan's production and the types of methods that will be used for effective involvement. In addition to the outreach methods set out in the SCI, the Council also has a "Duty to Cooperate" to work with a number of public agencies and service providers in the plan making process. These bodies are set out in the Localism Act 2011. The Council has prepared a separate paper confirming how it has discharged its duty in this respect.

Methods used	Development Plan Documents and associated Sustainability Appraisal				Community Infrastructure Levy			Supplementary Planning Documents		Neighbourhood Planning	
	Early engagement	Strategy and Options	Draft Plan	Independent examination	Preliminary draft charging schedule	Draft charging schedule	Examination in public	Early engagement	Formal consultation	Neighbourhood area	Submission
 Email and letters	Y	Y	Y		Y	Y		Y	Y	Y	Y
 Face to face questionnaires	Y							Y	Y		
 Leaflet questionnaires	Y	Y	Y					Y	Y		
 Online questionnaire on the Council's consultation portal	Y	Y	Y		Y	Y		Y	Y		
 Council notice boards/screens/information stands	Y	Y	Y			Y					
 Non-Council notice boards/stands/screens	Y	Y	Y			Y				Y	Y
 Press releases		Y	Y	Y		Y	Y			Y	Y
 Council website pages	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
 Social media (Twitter and Facebook)	Y	Y	Y			Y		Y	Y		
 Open workshops	Y							Y	Y		
 Young people's forum		Y									
 Public meetings		Y						Y	Y		
 Focus groups		Y			Y	Y		Y	Y		

3 Consultation involvement and engagement

3 Consultation involvement and engagement

3.1 This chapter sets out the main consultation/community engagement events that have taken place during the previous stages of consultation as the Local Plan has evolved.

Consultation before Regulation 18 version of the Local Plan

3.2 Following adoption of the Statement of Community Involvement in December 2012, Telford & Wrekin Council began its first consultation on the Local Plan's Strategy and Options over the period March - April 2013. Notification of both consultations and information on how to respond was sent out to all consultees on the development plans database, which had been built up since 2009.

3.3 To raise awareness of the Local Plan the following communications methods were used; emails, letters, hard copy and online questionnaires on the Council's consultation portal, Council notice boards/screens/information stands, non-Council notice boards across Telford & Wrekin Town and Parish Councils, press releases, Council webpages, Facebook, Twitter, Young Person's Forum, public meetings across the borough and focus groups.

3.4 The Proposed Housing and Employment Sites consultation took place in May - June 2014 using the same communication methods as Strategy and Options but following feedback from the Council's Scrutiny Committee it was agreed deeper parish engagement was necessary to further engage local communities during the Proposed Housing and Employment Sites consultation. Parishes were encouraged and supported to host public events in their areas for residents and businesses could engage further.

Regulation 18 consultation period and process

3.5 The Regulation 18 consultation took place between 3 August 2015 and ran until 25 September 2015. The Council took the decision to run a consultation process longer than the statutory minimum of six weeks because of the school holidays. It was considered that allowing the consultation to run over eight working weeks was sufficient.

3.6 Drawing on its own database of groups who have expressed an interest in the evolving Local Plan in the past and its obligation to identify specific and general consultation bodies, the Council made notified 296 organisations including public bodies, parish and town councils within the borough and in adjoining local authority areas statutory undertakers and a range of social and environmental groups, industry and trade bodies in addition to local residents. A list of bodies consulted can be seen in Appendix A. 865 residents also received a direct notification. A copy of the statutory advertisement associated with this consultation can be seen at Appendix B. Relevant representation forms used for the submission of online or paper representations are shown at Appendix C.

3.7 Having regard to its obligations under its SCI, the Council used the following methods of engagement:

Table 1 Methods used for Regulation 18 draft consultation

Methods used	
Email & Letters	Email & Letters to all consultees registered on the Local Plan database including specific consultees, general consultees and residents who have previously expressed an interest in the Local Plan.
Leaflet & Questionnaires	<p>The Council produced:</p> <ul style="list-style-type: none"> - a publicity leaflet - a summary leaflet - frequently asked questions leaflet - questionnaire <p>All of the above materials were available and distributed in hardcopy as well as available electronically via www.telford.gov.uk/localplan</p>
Online questionnaire on the Council's consultation portal	All database consultees, including residents, were directed by a link to the consultation portal and all publicity included a link to the portal via the www.telford.gov.uk/localplan landing page
Council notice boards/screens/information stands	The consultation was publicised in all public facing buildings (leisure centres, community centres, Council First Point Centres and libraries).
Non-Council notice boards/stands/screens	<p>All Post Offices received an information pack including poster for their notice boards.</p> <p>Town & Parish Council's advertised events via their communication channels including local notice boards, social media and newsletters.</p>
Press releases	The consultation was publicised in the Shropshire Star and Telford Journal as well the Council's Your Voice newsletter.
Council website page	The consultation was available via www.telford.gov.uk/localplan which included up to date information on public events.
Social media (Twitter and Facebook)	The consultation was publicised via the Council's corporate Twitter @TelfordWrekin and Facebook /TelfordWrekin

3 Consultation involvement and engagement

3.8 In addition to the approach above required by the SCI, the Council's Customer, Community & Partnership Scrutiny Committee recommendations were also taken into account including an extensive engagement process which resulted in 20 Town & Parish Council events, four resident group/forum meetings with different sectors and five Open Consultation Events. A summary of events and attendees is set out in Appendix D. Attendance at these events varied but there were strong attendances at three parish events (at Waters Upton, Edgmond and The Gorge). One meeting was held for Parish Councils from five rural parishes (Waters Upton, Edgmond, Ercall Magna, Tibberton & Cherrington and Lilleshall) to discuss rural housing set out in Policies SP3, HO10 and HO11. Over and above this outreach, an officer from the Council's Environment and Planning Policy Team was available between 8:30am and 5pm during weekdays to answer questions from the public over the telephone or face to face at the Council's offices in Wellington.

3.9 All duly made representations were processed and analysed.

4 Summary of main issues

4.1 385 individuals and organisations made representations to the Local Plan during the Regulation 18 consultation period. All have been uploaded to the Objective online consultation portal. Where consultees made comments on more than one section of the Local Plan, these have been recorded separately, thus the Council has recorded 1,810 individual comments. Appendix E records the number of comments made on each section or policy of the Local Plan. Comments were generally recorded as being either in support of a policy or objecting to it. Some consultees' comments were recorded as general comments where it neither supported nor objected to a policy or where it was unclear how the representation could be recorded.

4.2 Representations were also recorded into the following categories of respondents:

- Developer/commercial landowner/other providers of housing;
- Public bodies/local authorities/infrastructure providers and individual local councillors;
- Parish and Town Councils;
- Amenity, leisure and cultural groups;
- The borough's two MP's; and
- Residents.

4.3 An analysis of the main issues raised by the representations received on a policy by policy basis is summarised below.

4.1 Plan policy considerations

4.4 The three most frequently raised issues that have become apparent during community engagement sessions and in the written representations received can be summarised as follows:

- The number of homes to be delivered across the borough and in particular whether the proposed site allocations were appropriate;
- The spread of those homes across the borough and in particular in the rural area, where there was the highest level of attendance at public events; and
- Whether the plan provides appropriate protection for the natural environment.

4.5 Representations were received from public bodies and statutory undertakers, parish councils, residents, developers and their agents.

Shaping the Borough

4.6 The early section contains a profile of the borough drawing on a range of sources which provides the context for the preparation of the Local Plan. Some consultees recommended additional baseline documents be referred to in this section or have emphasised other elements of the baseline which should be strengthened (for example, the role of Harper Adams University or the importance of Telford Town Centre as a sub regional centre). Some consultees made suggestions in this section which are more appropriately dealt with in the themes of the Local Plan and are covered below.

4 Summary of main issues

Spatial Strategy

4.7 The Council received 112 representations in connection with the four spatial strategy policies. Policies SP1 (Telford) received the greatest number of representations with marginally more submissions objecting to it than opposing it. The majority of the representations received were around the spatial distribution of the housing requirement. 22 submissions were received in connection with Policy SP3 (Rural area). Many of the respondents who made submissions on these policies referred to them later on in detailed policies covered in later sections, namely around the canal, the delivery of employment land in Newport and the delivery of specific developments in Telford and in the rural areas.

Economy

4.8 The Council received 78 representations on this section of the Local Plan.

4.9 Overall, submissions received on employment land were broadly supportive as were the submissions on the allocations. All of the representations received in relation to the borough's retail policies (Policies EC4 to EC9) raised objections either relating to the proposed hierarchy or the articulation of individual policies including the management of out of town retail.

4.10 EC1 Employment Site Allocations: An issue was raised over the amount of employment land required and how this was linked to the housing requirement. One respondent raised concerns over the siting of similar industrial uses such as waste transfer. The residents of Newport were split on the employment site allocation E27 on land to the south of the A518 and a suggestion was made that land to the east of the A41 be promoted for employment instead. They were also concerned with Newport not being promoted enough as an employment destination. Residents of Old Park raised concerns over parking around the E18 site allocation (Central Way, Telford).

4.11 One objection was received in relation to Policy EC2: Employment uses on unallocated sites which stated that reference should be made to promoting Class B uses in the central area of Telford. Other submissions raised general comments on the policy or suggested other potential sites (Water Lane, Newport; central Telford; Land at Hortonwood; and land at Apley). Two objections were received in connection with Policy EC3: Employment in the rural area. One comment suggests the policy does not support economic growth in the rural area and another representation stated that the policy should emphasise more protection of Grade 2 and Grade 3 agricultural land. Other representations made other suggestions to improve the plan including a reference to the Wappenshall Wharf restoration.

4.12 Policy EC4 Hierarchy of centres: Comments were received suggesting the policy demonstrate it has been based on a robust evidence base. Three requests were made that Lawley and Ironbridge should be given district centre status in the Local Plan. Other representations supported the principle of a hierarchy of centres or the recent works to Telford Town Centre. One representation suggested the policy should identify support for other centres to come forward over the lifetime of the Local Plan.

4.13 Policy EC5 Town Centre: Representations commented on typographical errors, the use of town centre terminology, the proposed retail figures, the town centre map and comparison and convenience wording. One representations stated that a maximum retail figure did not

allow for flexibility and was not NPPF compliant. As a result of this submission, officers reviewed the retail study that formed part of the evidence base that informed the Regulation 18 version of the Local Plan. WYG, the authors of the report, amended their report to correct a number of errors.

4.14 Policy EC6 Non-retail uses: Comments received were concerned about there only being one policy to cover the Town, Market and District Centres and that Wellington did not get sufficient status. Representations were made to clarify. Objections were made implying the policy was unduly restrictive around Use Class A5 (take away) uses or did not give sufficient flexibility around Telford Town Centre.

4.15 Policy EC7 Shopping centre design: One representation was made in support of the policy and another suggested it should be applied more widely as the basis for quality shop frontages.

4.16 Policy EC8 Evening and night time economy: There was general support for the inclusion of this policy in the Local Plan from consultees. However, two submissions raised concerns that the policy does not provide sufficient clarity or detail for potential applicants and other relevant stakeholders and suggested that parts of the supporting text to the policy be incorporated into the policy itself or that the policy should state clearly where such uses should be promoted in Telford town centre.

4.17 Policy EC9 Community Life: One comment was received recommending amendments to be made to the supporting text of this policy.

4.18 Policy EC10 Out of town and edge of centre development: Representations from commercial organisations queried the supporting text, its conformity with the NPPF and justification for the mentioned thresholds. The thrust of representations received was that the policy needs to be more permissive of out of town and edge of centre shopping. One group wrote in to support the Council's position on out of town retail.

4.19 Policies EC11-13: Comments received on the tourism policies were requested supplementary information to be included including a specific reference to the potential benefits of restoring the Shrewsbury-Newport canal.

Housing

4.20 This section recorded the largest number of representations. Overall comments covered the overall scale of housing growth, its make-up and distribution, the type and tenure of homes to be delivered, and where exceptions to policy would be appropriate. The majority of representations focused on the housing requirement (Policy HO1), the proposed site allocations (Policy HO2), affordable housing (Policy HO5/HO6) and housing in the rural area (Policy HO10).

4.21 Policy HO1 Housing Requirement: Representations on the proposed housing requirement set out in Policy HO1 suggest that the figure is both too high and too low. A number of representations suggest that the Council's objectively assessed housing need, or OAN, and which underpins the housing requirement, is not NPPF-compliant. Other representations attempt to suggest that the council has not discharged its duty to cooperate obligations in determining the housing requirement. A number of representations queried the scale of growth being too high in relation to the assessed needs.

4 Summary of main issues

4.22 Policy HO2 Housing site allocations: The vast majority of representations received focused on a small number of site allocations listed in appendix D. The full break down of the number of comments are listed within appendix D. Comments raised issues over access to the sites, infrastructure, building on green spaces, and the need for sites. Through the consultation there was further sites promoted for development and consultees suggesting their sites were more suited. A full break down of these alternative sites is included in appendix F.

4.23 Policy HO3 Housing Trajectory: Representations focused mainly on the effectiveness of the policy to deal with changing circumstances, for example where delivery does not match the trajectory. Some representations also suggested that the plan should go further by including a reserve sites policy. The council considers there to be sufficient flexibility built into the overall housing supply and so does not require a policy identifying specific sites in reserve.

4.24 Policy HO4 Housing Mix: Representations were mainly concerned with the justification for the policy wording relating to single type and tenure developments, as well responses on the inclusion of references to certain standards (lifetime homes).

4.25 Policy HO5 Affordable housing thresholds and percentages: The main issues raised by representations related to the thresholds and the percentages. Since the publication of the local plan, the reference in the Planning Practice Guidance (PPG) to the 11 or more dwelling threshold (see Policy HO5) has been withdrawn following a successful legal challenge. However, the government has appealed the ruling and so the threshold may yet be reinstated prior to submission. In terms of the percentage contributions disaggregated across the borough, a number of representations suggest these are too high, particularly for Telford urban area (many comments were also replicated under Policy HO6). No changes are proposed at this until the findings of the SHMA update are known and digested.

4.26 Policy HO6 Delivery of affordable housing: A comment was submitted questioning the need for a separate policy relating to delivery of affordable housing, and this could be dealt with via suitably worded planning conditions. (Provision in perpetuity and financial contributions cannot be secured via planning conditions, it must be through a legal agreement). Since the publication of the local plan, the government has issued statements that will most likely result in a number of significant changes the affordable housing policy at the national level. These include: changes to the definition of affordable housing to include 'starter homes' for first time buyers under 40 years old sold at 80% market value; and removal of the obligation on developers of private led schemes to provide an element of social housing. The detail is as yet unknown, but these changes will most likely require some changes to Policy HO5 and HO6 in due course.

4.27 Policy HO7 Specialist housing needs: Representations have queried the emphasis on older people's accommodation when other groups are also in need of specialist housing. Other comments on the policy suggest clarification is needed on the proportion of homes that will contribute towards delivering specialist needs housing. The council proposed a number of amendments in response to the representations, as well as some other amendments to help with readability.

4.28 Policies HO8 and HO9 - One comment was received suggesting an additional criterion for gypsy and traveller sites. Other representations supported the policies.

4.29 Policies HO10 - There were a large number of representations with polarised views about the policy. A number of groups and individuals supported the Council's approach relative to the previous Proposed Housing and Employment Sites consultation but suggested improvements to it, for example requiring new housing in the rural area to meet the needs of older people with bungalows and smaller homes. One submission supported the exclusion of Roden from the list of settlements to take housing growth. One parish council supported the policy approach but wanted infill within the five identified villages to be evenly spread instead. It is clear from comments made at the various public meetings and submissions received that many people interpret the reference to 80 additional new homes to be spread around five villages to be a maximum figure. By contrast, other submissions were received which opposed the policy either because they thought it was too restrictive or not restrictive enough.

4.30 HO11 - representations received generally supported this policy as a means of delivering additional housing (for example, for exceptional design, additional affordable housing to meet local needs).

Natural Environment

4.31 91 representations were made on this section.

4.32 NE1 Provision of green infrastructure: There was general support from residents and residents associations on the Council's plans to protect and enhance green infrastructure but consultees felt that the current suite of policies was over complicated in its multi-layered approach. The HCA supported the Council's aspiration to require development to include green infrastructure but suggested some changes to the policy. There was an objection from a developer to the green infrastructure policies who suggested that insufficient evidence was provided by the Council to support the policies. Consultees wished to see the inclusion of blue infrastructure like canals, lakes pools and rivers in the definition of green infrastructure. Few comments were also made by members of the public about the need to give more emphasis to the Shrewsbury and Newport canals. Natural England were supportive of the recognition given to Green Infrastructure and asked that the definition be linked to the NPPF definition of Green Infrastructure.

4.33 NE2 Management and maintenance of green infrastructure: Comments were in general support although very few comments were received. Newport Town Council commented that the Local Plan appears to make no reference to the provision of burial space in the borough whilst Shropshire Wildlife Trust supported the policy and hope that the policy would also include management appropriate to ecological interests. One resident commented that there was no reference to the maintenance of important existing strategic areas like Ercall Wood and Granville Country Park.

4.34 NE3 Green network: This policy received more than a thirds of all representations in this section. The representations raised a range of polarised and conflicting views. Residents were generally welcoming the protection of the Green Network while developers were more cautious. Some Parish Councils and residents suggested additional sites which they would like to be included in the green network. The HCA supports the intentions of the policy but identifies some errors both in the policy and on the policies map. HCA suggested some sites which they would like to see removed from the green network including some sites which already have planning permission or are proposed allocations. Some residents and housebuilders objected to the

4 Summary of main issues

policy as they considered that the Council did not carry out a thorough review of the green network. A developer also objected their site designated as green network as doing so undermines the development potential of their site. Residents in Newport welcome the designation of green network but feel that more sites could be protected but a housebuilder objected to it as they are of the opinion that the designation is unnecessary and inappropriate for market towns.

4.35 NE4 Strategic landscapes: Parish Councils and residents support the policy with many residents stating that the Lilleshall gap should run from Newport to Muxton and not just Lilleshall to Muxton. Some residents also suggested having a buffer between Newport and Edgmond.

4.36 NE5 Biodiversity and geodiversity: Very few comments were received on this policy with general support of the policy from local residents and other organisations including Telford Green Spaces Partnership and Shropshire Wildlife Trust. Natural England supports the policy and highlighted that developments should aim for no net biodiversity loss. Newport Town Council referred to the need for some mention in the Plan of how bees and other pollinators are to be protected. There was a strong support from residents for the designation of more Local Nature Reserves. One resident commented that research suggests offsetting is not effective in protecting biodiversity and this supports the Council's approach.

4.37 NE6 Trees, hedgerows and woodlands: Very few comments were received on this policy with a general support from residents and especially those from the Old Park Residents Association. One resident suggested that long term implications of felling trees and loss of biodiversity must be considered alongside the short term implications. Natural England asked for differentiation between ancient woodland and irreplaceable habitats from tree and woodlands in general.

4.38 NE7 Existing public open space: There was general support for the policy. Some residents commenting on the policy did not object to the Council's approach of maintaining, enhancing and protecting formal and informal sports and recreational facilities but they raised objections where proposed development will result in loss of facilities like at proposed allocation site H10. Madeley Parish Council felt that the Plan does not recognise the designation of local green space as identified in the Madeley Neighbourhood Plan. The Telford Green Spaces Partnership and other parish councils expressed interest to be involved in the process of selecting the green guarantee sites.

4.39 NE8 Provision of public open space: Very few comments were received on the policy with the majority of representations supporting the council's approach on green spaces. In relation to the 150 protected spaces under the Green Guarantee, many sites were suggested by residents and residents associations for the Council's consideration. Stirchley & Brookside Parish Council commented that installation of play equipment needs to involve agreement of funding for future maintenance.

Community

4.40 14 submissions were made on this section. Most representations made were in support of policies to sustain, enhance and provide social infrastructure and support and promote cultural facilities. Concerns expressed related to infrastructure delivery and the need to support

community-led initiatives. Specifically aspirations for cultural spaces in the Telford Town Centre, the restoration of the Shrewsbury-Newport Canal, and the preservation of historical sites across the borough were expressed.

Connections

4.41 47 representations were made on this section.

4.42 Policies C1-C5: The majority of comments relating to the connections section were supportive of the Council's approach to mitigating the impact of development on the highway network and providing travel choice for residents and visitors by improving walking, cycling and bus networks. A number of comments were received relating to the preservation and protection of canals additional text will be included within the tourism section that will address this point.

4.43 Policies C6 and C7: Concerns were raised around the need to take into account existing parking issues in the vicinity of new developments and to consider the quality and quantity of parking within new developments. The parking policies have been strengthened to take account of foreseeable parking issues within the local area surrounding developments. Comments were also provided around the need to consider appropriate parking of lorries and buses, especially in employment locations, parking policies have been strengthened to include reference to the need for developments to provide parking that meets the operational needs of a development.

4.44 Policies C8 and C9: Very few comments were received. Several residents raised issues over the coverage of mobile infrastructure and broadband in the borough. Operators also commented on the wording of the policies with suggested changes.

Built Environment

4.45 36 representations were made on this section.

4.46 Policy BE1: Urban Design. Comments made relevant to this policy that suggested a revision included a request to refer to Secured by Design principles or to be more precise on how to deliver design quality including the delivery of green infrastructure. One parish wrote in to suggest that the policy impose maximum densities to protect the borough. One resident has referred to the need for the policy to consider the Ironbridge environment in particular.

4.47 Policy BE2: Residential alterations. Two representations comments were submitted which supported this. One parish wrote in to request the policy be strengthened to impose tighter planning requirements around the creation of HMOs. Another parish suggested that residential alterations policy should not be used as a means of reducing biodiversity. A representation from an architect suggested that matching materials are not always appropriate.

4.48 Policies BE3 to BE8: Historic England have written a comprehensive range of comments on these policies, the thrust of which is to amend slightly the wording associated with the individual policies. Other representations referred to the fact that the scope of this part of the chapter was not wide enough. It should aim to protect historic but unlisted buildings in Wellington such as Haybridge Hall and the Clifton cinema and promote projects such as the restoration of the Shrewsbury & Newport canals. There were no objections to a policy on locally listed buildings (Policy BE4) but one architect suggested that there should be an opportunity for owners to be part of a process deciding what building is included and why as a means of securing their

4 Summary of main issues

support to preserve these buildings. Again, there was broad support for the policies for Listed Buildings, Conservation Areas and Parks and gardens of historic interest (Policies BE3, BE5 and BE6) but two residents wrote in to ask for it to be strengthened to prevent demolition. Five representations were received in connection with Policy BE7 (Ironbridge Gorge World Heritage Site). None opposed the policy but made suggestions to improve it or to express support for a future Supplementary Planning Document. One representation questioned the consistency of the policy with the site allocation at The Beeches (Site H5).

4.49 Policies BE9 & BE10: Only two comments were made on Policy BE9 and none on Policy BE10. It was commented that Policy BE9 should make reference to substantial investment that has been made in stabilisation projects in Ironbridge. The Coal Authority supports the inclusion of this policy as it identifies the risk from coal mining legacy in the area. The Environment Agency supports the policy too and recommends to include a reference to protecting the water environment.

Environmental Resources

4.50 55 representations were made on this section.

4.51 ER 1 Renewable Energy: A number of the representations from developers challenged the merit of the policy, indicating that it adversely affected viability or that the policy desire for development to be built to Passivhaus standards or BREEAM was inconsistent with current legislation. On the other hand, a number of respondents stated that the policy needs to be strengthened as it did not go far enough in stipulating renewable energy schemes and sustainable building standards. A number of respondents stated that the policy needs to include a sitting criteria for renewable energy schemes to protect against impacts on historic environment, village communities, biodiversity impacts and agricultural land or that it should specifically identify Telford & Wrekin as a borough that would support wind energy.

4.52 Policy ER2 Mineral Safeguarding: The representations raised issues over the wording and the effectiveness of the policy to safeguard mineral resources. Alternative methods (other than prior extraction) of protecting mineral resources were suggested. The comments made also advised additional policy wording and for individual infrastructure sites to be designated on the policies map. The identification of the mineral safeguarding area and the proposed policy was supported.

4.53 Policies and ER3 and ER5: No objections were received in relation to either of these policies.

4.54 Policy ER4 Sand and gravel resources: Representations considered the approach adopted to be inconsistent with the NPPF and the NPPG. Comments were submitted questioning the supply of sand and gravel and said that Telford & Wrekin should be seen to be contributing to the sub regional apportionment and questioned the effectiveness and soundness of the policy. Some representations also suggested that the policy should allocate sites for sand and gravel and asked for the Pave Lane site to be included in the plan.

4.55 Policy ER6 Mineral Development: A comment was received supportive of mineral extraction for locally distinctive building material, it supported mineral development, as long as there was no harm to heritage assets or historic landscapes as a result of this mineral development.

4.56 ER7-9 Waste: Respondents were in support of the waste policies. However, in regards to Policy ER7 respondents such as the Environment Agency and Veolia suggested the need for a safeguarding policy for existing waste facilities. Other respondents such as Historic England, requested that we make explicit the need to protect the historic environment, another mentioned biodiversity when assessing applications for waste developments.

4.57 Policy ER 10 Water Conservation and Efficiency: Respondents such as the Environment Agency supported the policy. However, a few others raised concerns over water demand issues the new development will take across the plan period.

4.58 Policy ER 11 Sewage Systems and Water Quality: Predominately there was support for the policy including support from the Environment Agency. However, a couple of concerns were raised by respondents in regards to the potential drainage issues which may occur in Ironbridge and South Telford due to the proposed new development.

4.59 Policy ER 12 Flood Risk Management : There was a issue raised over the proposed new developments effecting the Northern Interceptor Channel.

Appendices to the Local Plan

4.60 Most representations received around the appendices focused on the employment and housing allocations.

4.61 Ten site specific representations were made on the employment allocations. Eight focused on Site E18 (Central Telford, Colliers Way) and asked that the development of this site should take into account the need to plan for sufficient parking. One representation was received in connection with E27 (Newport, land south of A518), objecting to the loss of countryside. The local parish council objected to E28 (Shawbirch), suggesting the allocation was contrary to the findings of a landscape sensitivity study.

4.62 196 representations were made around the housing allocations. Some identified other allocations and Appendix F assesses the Council's view on these. Groups of residents objected to local allocations including H1 (Muxton), H2 (Woodhouse, Priorslee), H5 (The Beeches) and H10 (The Hem, Telford) siting localised concerns about the environment, traffic and heritage. One organisation objected to a number of allocations on sustainability grounds.

4.63 The parking standards in Appendix E raised few comments. Six residents raised a common concern about parking associated with development close to Old Park. One resident suggested this part of the Local Plan should make provision for car clubs.

4.64 Submissions on the designated sites of biodiversity and geodiversity (Appendix F) supported the list or suggested additional sites for inclusion such as Ketley Paddock Mound. One representor suggested that the list could be improved and a map or OS grid reference included to show each site.

4 Summary of main issues

4.65 One submission was raised in connection with the list of Local Centres (Appendix H) asking for Dawley Bank to be included in the list of Local Centres.

4.2 Comments on the evidence base and methodology supporting the plan

SA comments

4.66 Concerns were raised by two developers on why their sites were excluded through the SA process. Another respondent - Historic England - suggested textual alterations to fit in with the latest planning guidance. They also made comments on the objectives and the assessment scoring.

4.3 Views from neighbouring local authorities

4.67 Appendix C shows the list of all bodies that have been contacted. As part of the consultation, all duty to cooperate bodies were given opportunity for comment, including neighbouring local authorities. Discussions involved if the additional housing requirement could pick up shortfall from elsewhere. Further detail has been provided in the updated Duty to Cooperate statement. No neighbouring local authority has objected to the Local Plan. However, the Black Country authorities (Walsall, Wolverhampton, Dudley and Sandwell) and South Staffordshire Council have suggested that some of the Council's housing requirement be allocated towards the unmet need of the Greater Birmingham, and Black Country Housing Market Area.

5 Responses to the representations received

5.1 Officers have reviewed all of the representations received and considered changes to the document as necessary. They have also taken account of recent changes in government policy especially around affordable housing and renewable energy and have taken advice internally from development management staff to improve the readability of individual policies. The main changes proposed in the Regulation 19 (Publication) version of the Local Plan are summarised as follows:

5.2 Section 1 – paragraph 1.3.2.1 has updated the Council’s current position with regard to its duty to cooperate with other public bodies in the plan making process.

5.3 Section 2 has been updated to take account of new issues such as the release of the 2015 Index of Multiple Deprivation and comments from the West Midlands Integrated Transport Authority on HS2 and the local rail service. An extra aim has been added requiring the Local Plan to minimise the impact of new development on natural resources and encouraging their efficient use.

5.4 In Section 3, the Strategic Policy SP1 Telford has been strengthened to emphasise that Telford Town Centre will be supported as the borough’s sub regional centre. The supporting text to Policy SP4 Presumption in favour of sustainable development has been strengthened to confirm how the Council will require developers to make contributions in the form of planning obligations. SP Policies 1, 2 and 3 (Telford, Newport and the Rural Area) make clear the Council’s preference to policies make clear the Council’s desire to prioritise development, after taking into account of housing and employment land allocations, on previously developed land to protect high quality agricultural land.

5.5 The Key Diagram (Page 32) has been altered to reflect new boundaries of three proposed strategic landscapes. One of them, the Lilleshall Village, gives extra protection to the village of Lilleshall from unwanted development and maintains its freestanding character. The revised Key Diagram also confirms that two of the shopping centres in the borough (Lawley and Ironbridge) should be District Centres giving the shops in these areas more protection including from proposed changes of use to other non-retail uses. These changes to the Key Diagram are also reflected in changes to Policies NE7 Strategic Landscapes and EC4 Hierarchy of centres.

5.6 Policy EC1 Strategic employment areas – has been amended with a reduction in the minimum amount of employment land expected to be delivered over the lifetime of the Local Plan from 110 ha to 76 ha. This reflects the anticipated delivery of new employment land linked with consultants’ advice in establishing the Objectively Assessed Need that has informed the borough’s housing requirement. Other employment policies have been redrafted to emphasise support for waste related uses on some employment site allocations and other uses that are ancillary to B Use Class activity. Such an approach prevents the Council from having to allocate specific sites for waste related uses.

5.7 The retail policies have been restructured and individual policies renamed to improve the robustness of the Plan. Policy EC4 – Hierarchy of centres – has been adjusted. Lawley and Ironbridge have been identified as District Centres. Policy EC5 – Telford Town Centre has been rewritten. It confirms more forcefully that Telford Town Centre will be promoted as a sub regional centre based on a shopping centre that looks outwards. It gives a commitment to

5 Responses to the representations received

promoting visitor and leisure facilities and the International Centre and confirms that the Council will continue to work with partners to improve pedestrian and vehicular links into the Town Centre including to and from Telford Central station. It states clearly that Telford Town Park will be protected and enhanced.

5.8 Policy EC6 – Market Towns and District Centres - maintains the Council's commitment to resist the loss of retail in primary shopping areas and allow more flexibility to facilitate change in the shape of our high street to reflect recent changes in legislation and shopping patterns across the country. Policy EC9 – Evening and night time economy - has been amended to confirm that the Council will support additional night time activity in Oakengates as well as Telford Town Centre, Wellington and Newport. This change reflects the uniqueness of Oakengates as the home to The Place theatre.

5.9 Policy EC11 has been renamed Improving links to tourist destinations and Policies EC12 and EC13 merged to provide one policy covering hotel development..

5.10 In Section 5 – Housing, Policies HO4 Housing mix and HO7 Specialist housing needs have been redrafted to strengthen the Council's commitment to promote a broader mix of housing types including for the elderly. Policy HO5 Affordable Housing retains the same commitment to secure an element of affordable housing for schemes of 11 or more homes but (the now outdated) references to the Government's Planning Practice Guidance have been removed.

5.11 Policies affecting the provision of rural housing have been substantially rewritten. Policy HO10 Residential development in the rural area has been adjusted to provide an update on sites with planning permission or minded to grant approvals (Allscott and Crudgington) and to clarify where new housing will be supported in Edgmond. It clarifies that Lilleshall is now located within a Strategic Landscape. The effect of the revisions to this policy make clear that other rural settlements with some previously developed land such as Roden will not be supported as settlements for extensive new housing. Policy HO11 has been renamed as Affordable rural exceptions and redrafted to confirm where exceptions to rural housing policy will apply. It is considered that such an approach is in conformity with the NPPF.

5.12 Section 6 – Natural Environment – has been rewritten in response to representations. It is now structured in a way that will help developers understand more clearly what they will need to do to comply with the policies in this section. The functions of the Green Network have been revised and updated to address current requirements to protect its qualities and character. The Policies Map has been prepared which corrects cartographical errors noted by residents. Additional sites have been identified as Green Network within Newport.

5.13 In Section 7 – Community - the term "social infrastructure" has been replaced with the term "community facilities". Policy COM1 has been rephrased to use the language of Telford & Wrekin Core Strategy Policy CS10 to improve its readability.

5.14 Minor typographical changes have been made to Section 8 – Connections.

5.15 Section 9 has been renamed Built environment and heritage to emphasise the intention to celebrate and protect the borough's heritage. Policy BE1 now reads Design Criteria to make sure it can be applied in both rural and urban settings. The supporting text has been redrafted it to make it more locally applicable. The revised text has also drawn on Wrekin Local Plan

Policy UD2. Policy BE2 Residential alterations is a catch all policy for simple applications such as extensions to houses and changes of use such as flat conversions and Houses in Multiple Occupation. The policy makes clear that the Council will prepare a Supplementary Planning Document to clarify how this policy will be interpreted.

5.16 The heritage policies in Section 9 have been restructured and renumbered to reflect the heritage hierarchy. Policy BE3 Ironbridge Gorge World Heritage Site has been made more substantial with stronger links to the draft World Heritage Site Management Plan that is being prepared. Policy BE5 Conservation Areas has been revised to make clear that the Council requires traditional shop fronts in conservation areas to be preserved and to confirm that the Council will not support development which adversely affects the setting of such heritage assets. Policy BE6 Buildings of local interest has been redrafted to make it more locally applicable. It specifically refers to Duke of Sutherland cottages as an example of a local type of building which the Council would protect.

5.17 Section 10 - Environmental resources – has been redrafted to reflect representations from developers, recent ministerial advice and the need to clarify how waste will be managed. Policy ER1 – Renewable energy - has removed references to PassivHaus and BREEAM and it clarifies that it does not cover wind energy to be consistent with an announcement by the Secretary of State in June 2015. Such an approach complies with current government guidance.

5.18 Policy ER4 Sand and Gravel Resources now identifies Pave Lane as a reserve site for sand and gravel extraction if other sites in Shropshire do not come forward. The criteria for waste management facilities in Policy ER7 Waste management facilities have been revised to ensure the borough will retain its waste management capacity without the need to allocate sites in the Local Plan.

5.19 The appendices to the Local Plan have been updated and an extra monitoring indicator included.

5.20 To clarify their purpose and location, Housing Site Allocation H1 (Muxton) has been renamed Muxton and Donnington Sustainable Urban Extension and Site H2 as the Priorslee Sustainable Urban Extension. The area of Housing Site Allocation H5 (The Beeches) has been reduced to make sure that the area of land allocated for new housing is the minimum required to enable the full restoration and re-use of the listed building on the site. The area of Housing Site Allocation H10 (The Nedge) has been reduced to clarify the parts of the site where new development will be supported. This site will still be a low density housing scheme with extensive areas of open space. The likely density for this site allocation (8 dwellings per hectare) reflects this.

5.21 Changes to the other appendices have been made (confirming, for example, that the housing yields associated with the various Housing Site Allocations are indicative only) and renumbering them. The tables in the car parking standards for residential development have been simplified.

5.22 The opportunity to review the Local Plan in the light of comments received during the Regulation 18 consultation has allowed officers to remove typographical errors, cut out repetitions for example, merge policies covering leisure, culture and tourism development and tourist accommodation. Minor stylistic changes across the Local Plan have improved its readability

5 Responses to the representations received

overall. Other minor changes have been made to the Policies Map, including corrections to the Green Network site designation and the confirmation of primary shopping area boundaries across the borough's market towns (Newport and Wellington) and seven district centres. The urban area boundary of Newport on the Policies Map has been adjusted to reflect all unimplemented planning permissions in the town. To address concerns about individual site allocations and the designated sites of biodiversity and geodiversity, an interactive map has been prepared with the Regulation 19 version of the Local Plan that can be viewed online.

5.23 It is considered that the Regulation 19 version of the Local Plan is crisper and more precise.

A List of consultees

List of specific bodies and persons the local planning authority invited to make representations under regulation 18;

Table 2

ORGANISATION TYPE	NAME OF ORGANISATION
Coal Authority	The Coal Authority
Environment Agency	The Environment Agency
English Heritage	English Heritage Historic England
Marine Management Organisation	Marine Management Organisation
Natural England	Natural England
Network Rail	Network Rail Office of Roads & Rail Regulation
Highways England	Highways England
Neighbouring local planning authorities	Shropshire Council
Neighbouring County Councils	Staffordshire County Council South Staffordshire County Council
Other local planning authorities & County Councils	Birmingham City Council Dudley Metropolitan Borough Council Herefordshire Council Newcastle Borough Council Sandwell Metropolitan Borough Council Stafford Borough Council Stoke-on-Trent City Council Walsall Metropolitan Borough Council Wolverhampton City Council

A List of consultees

ORGANISATION TYPE	NAME OF ORGANISATION
Parish Councils	<p>Chetwynd Aston & Woodcote Parish Council</p> <p>Chetwynd Parish Council</p> <p>Church Aston Parish Council</p> <p>Dawley Hamlets Parish Council</p> <p>Donnington and Muxton Parish Council</p> <p>Edgmond Parish Council</p> <p>Ercall Magna Parish Council</p> <p>Eyton upon the Weald Moors Parish Meeting</p> <p>Great Dawley Parish Council</p> <p>Hadley & Leegomery Parish Council</p> <p>Hollinswood & Randlay Parish Council</p> <p>Ketley Parish Council</p> <p>Kynnersley Parish Council</p> <p>Lawley & Overdale Parish Council</p> <p>Lilleshall Parish Council</p> <p>Little Wenlock Parish Council</p> <p>Madeley Town Council</p> <p>Newport Town Council</p> <p>Oakengates Town Council</p> <p>Preston upon the Wealdmoors Parish Meeting</p> <p>Rodington Parish Council</p> <p>St Georges and Priorslee Parish Council</p> <p>Stirchley & Brookside Parish Council</p> <p>The Gorge Parish Council</p> <p>Tibberton & Cherrington Parish Council</p>

ORGANISATION TYPE	NAME OF ORGANISATION
	<p>Waters Upton Parish Council</p> <p>Wellington Town Council</p> <p>Wrockwardine Parish Council</p> <p>Wrockwardine Wood and Trench Parish Council</p>
Neighbouring Parish Councils	<p>Adbaston Parish Council</p> <p>Astley Parish Council</p> <p>Barrow Parish Council</p> <p>Blymhill & Weston-under-Lizard Parish Council</p> <p>Broseley Town Council</p> <p>Buildwas Parish Council</p> <p>Cheswardine Parish Council</p> <p>Childs Ercall Parish Council</p> <p>Hinstock Parish Council</p> <p>Hodnet Parish Council</p> <p>Kemberton Parish Council</p> <p>Norbury Parish Council</p> <p>Shawbury Parish Council</p> <p>Sheriffhales Parish Council</p> <p>Shifnal Town Council</p> <p>Stanton Upton Hine Heath Parish Council</p>
Police & Crime Commissioner	<p>Police & Crime Commissioner West Mercia</p> <p>West Mercia Constabulary</p>
Communication operators / facility owners	

A List of consultees

ORGANISATION TYPE	NAME OF ORGANISATION
Clinical Commissioning Group	NHS Telford & Wrekin Clinical Commissioning Group Shrewsbury & Telford Hospital NHS Trust Royal Shrewsbury Hospital Shropshire Clinical Commissioning Group NHS Property Services Ltd
Gas & electricity companies	National Grid Gas Distribution Eon UK PLC West Coast Energy Ltd Western Power Distribution
Water undertaker	Severn Trent Water
Electronic Communications providers	British Telecom
Homes & Communities Agency	Homes & Communities Agency

List of general consultation bodies the local planning authority invited to make representations under regulation 18;

Table 3

Age Concern

Allscott, Rushmoor Lane and Long Lane Residents Association

British Aggregates Association

British Cement Association

British Ceramic Confederation

British Geological Survey

Central Dawley Residents Association

Central Trains Ltd

Civil Aviation Authority

Coalport Action Group

Confederation of UK Coal Producers
Forestry Commission
Freight Transport Association
Friends, Families and Travellers and Travellers Law Reform Project
Historical & Archaeological Society
Hutchison 3G Ltd
Jackfield Residents Association
Jobcentre Plus
Landmark Information Group
Lightmoor New Community Ltd
Local Nature Partnership
National Farmers Union Shropshire
Newport History Society
Oakengates Partnership
Office of Government Commerce
Parochial Church Council of St Peter
Priorslee Community Association
Quarrey Products Association England
R.C Church
Residents Association Breton Park
Road Haulage Association
Shropshire & Telford TUC
Shropshire Chamber of Commerce
Shropshire Fire and Rescue Service
Shropshire Ornithological Society
Small Plastic Parts Ltd
Sport England
St Peter's CE Primary School

A List of consultees

Stone Federation Great Britain
Telford & East Shropshire of CAMRA
Telford & Wrekin CVS
Telford & Wrekin Highways Authority
Telford & Wrekin Partnership
Telford Bridleways Association
Telford College of Arts and Technology
Telford Recycling Group
Telford Steam Railway
The Burton Borough School
The Chartered Institute of Waste Management
The Gypsy Council
The Lawn Tennis Association
The Marches Local Enterprise Partnership
The Planning Inspectorate
The Showmens Guild of Great Britain
UK CIRIA Ltd
University of Wolverhampton
Vodafone Ltd
Wellington & District Cottage Care Centre Trust
Wellington Civic Society
Wellington LA21
West Mercia Probation Service
West Midlands Probation Service
WM Planning and Transportation Sub-Committee
WM Planning and Transportation Sub-Committee
Wrekin Conservation Association
Wrekin Juniors Football Club



Wrockwardine Parish Council / CPRE

Wrockwardine Village Hall Committee

XX amount of residents were also contacted via the Local Plan database.

B Telford & Wrekin Local Plan Regulation 18 Public Notice

B Telford & Wrekin Local Plan Regulation 18 Public Notice

Borough of Telford & Wrekin

Telford & Wrekin Local Plan Development Plan Document

Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Planning) (England) Regulations 2012

This notice has been prepared in accordance with Regulations 18 and 35 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

This initial statutory consultation under Regulation 18 of the 2012 Local Planning Regulations formally launches the Telford & Wrekin Local Plan, a new development plan for the Borough covering the period to 2031. The Telford & Wrekin Local Plan, when adopted, will form part of the development plan for the Borough.

On 23 July 2015, the Council's Cabinet approved the Telford & Wrekin Local Plan for consultation. In accordance with the relevant regulations, this document is now subject to a period of consultation, starting Monday 3 August 2015 and ending at 5pm on Friday 25 September 2015.

The document can be viewed on the Council's website at www.telford.gov.uk/localplan. Alternatively, hard copies are available to view at the following locations:

- Business & Planning First Point Wellington, Larkin Way, Wellington, Telford, TF1 1LX.
- Dawley Library, Phoenix Academy, Duce Drive, Telford, TF4 3JS.
- Donnington Library, Turreff Avenue, Donnington, Telford, TF2 8HG.
- Reception, Addenbrooke House, Ironmasters Way, Telford, TF3 4NT.
- Hadley Library, Hadley Learning Community, Crescent Road, Hadley, Telford, TF1 5NU.
- Madeley Library, 21 Russell Square, Madeley, Telford, TF7 5BB.
- Newport Library, 53-55 High Street, Newport, TF10 7AT.
- Oakengates Library, The Place, Limes Walk, Oakengates, TF2 6EP.
- Southwater Library, Southwater One, Southwater Square, Southwater Way, Telford, TF3 4JG.
- Stirchley Library, The Sambrook Centre, Stirchley, Telford, TF3 1FA.
- Wellington Library, Wellington Civic & Leisure Centre, Larkin Way, Wellington, Telford, TF1 1LX.

Representations on the document are invited and must be **received no later than 5pm on Friday 25 September 2015**. All comments received by the deadline will be considered and will go on to inform the Local Plan preparation process.

Representations should be made in the following ways:

Online at: www.telford.gov.uk/localplan

Via email to: localplan@telford.gov.uk

Writing to: Environment & Planning Policy Team, Business & Development Planning, Telford & Wrekin Council, PO Box 457, Telford, TF2 2FH.

If you have any more information, please contact the Planning Policy team on 01952 384241 or email to: localplan@telford.gov.uk.

Michael Barker

Assistant Director: Planning Specialist

3 August 2015

(TWC LP 00716)



Telford & Wrekin
COUNCIL

C Standardised representation form

Table 4

<div data-bbox="215 432 753 495">1 Telford & Wrekin Local Plan - Representation Form Reg 18</div> <div data-bbox="252 506 667 521">1 Telford & Wrekin Local Plan - Representation Form Reg 18</div> <div data-bbox="252 533 288 544">Details</div> <div data-bbox="252 555 598 566"><p>Please fill in a separate sheet for each representation you wish to make.</p></div> <div data-bbox="252 577 406 589"><p>All comments should be sent to:</p></div> <div data-bbox="252 600 414 611"><p>Environment & Planning Policy</p></div> <div data-bbox="252 622 432 667"><p>Business & Development Planning Telford & Wrekin Council PO Box 457, Telford, TF2 2FH</p></div> <div data-bbox="252 678 416 716"><p>Tel: 01952 384241 Fax: 01952 384254 Email: localplan@telford.gov.uk</p></div> <div data-bbox="252 728 319 739"><p>Please note:</p></div> <div data-bbox="252 750 702 862"><p>For comments to be accepted all respondents are required to provide their contact details. You should note that your comments are not confidential; they will be published on the Council's website and copies made available for public inspection. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012, requires all representations received to be submitted to the Secretary of State. By commenting on the document and submitting your comments to the Council you are giving your consent to the processing of personal data (name and organisation) by Telford & Wrekin Council unless you instruct the Council otherwise. In addition this information may be put into the public domain which includes on the Council's web site.</p></div> <div data-bbox="268 880 352 891"><p>Personal Details</p></div> <div data-bbox="268 902 399 925"><p>Title (please select one answer)</p></div> <div data-bbox="268 936 710 947"><p>Mr <input type="radio"/> Mrs <input type="radio"/> Ms <input type="radio"/> Miss <input type="radio"/></p></div> <div data-bbox="268 958 327 969"><p>First Name</p></div> <div data-bbox="268 981 718 992"><input type="text"/></div> <div data-bbox="268 1014 327 1025"><p>Last Name</p></div> <div data-bbox="268 1037 718 1048"><input type="text"/></div>	<div data-bbox="879 432 1417 477">1</div> <div data-bbox="946 510 989 521"><p>Address</p></div> <div data-bbox="946 533 1396 716"><input type="text"/></div> <div data-bbox="946 728 1380 757"><p>Please enter your home, work and mobile telephone number and your email address below:</p></div> <div data-bbox="946 768 1396 790"><input type="text"/></div> <div data-bbox="946 801 989 813"><p>Job Title</p></div> <div data-bbox="946 824 1396 846"><input type="text"/></div> <div data-bbox="946 857 1013 869"><p>Organisation</p></div> <div data-bbox="946 880 1396 902"><input type="text"/></div> <div data-bbox="933 913 1077 925"><p>Agents details (if applicable)</p></div> <div data-bbox="933 947 1380 1104"><input type="text"/></div>
<div data-bbox="215 1261 753 1317">1</div> <div data-bbox="268 1350 327 1361"><p>Comments</p></div> <div data-bbox="268 1373 710 1400"><p>Please add your comments answering the questions below fully to ensure we can deal with your comments in an appropriate manner.</p></div> <div data-bbox="268 1411 566 1440"><p>Is this a comment in support of the plan or an objection? (please select one answer)</p></div> <div data-bbox="268 1451 710 1462"><p>Support <input type="radio"/> Objection <input type="radio"/> General Comment <input type="radio"/></p></div> <div data-bbox="268 1473 470 1485"><p>Please give details of your comments.</p></div> <div data-bbox="268 1496 718 1753"><input type="text"/></div>	<div data-bbox="879 1261 1417 1328">1 Telford & Wrekin Local Plan - Representation Form Reg 18</div> <div data-bbox="922 1350 1372 1395"><p>Please set out what change(s) you consider necessary to remedy any objection. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.</p></div> <div data-bbox="922 1411 973 1422"><p>Changes:</p></div> <div data-bbox="922 1433 1369 1590"><input type="text"/></div> <div data-bbox="922 1601 973 1612"><p>Signature</p></div> <div data-bbox="922 1624 1369 1646"><input type="text"/></div> <div data-bbox="922 1657 949 1668"><p>Date</p></div> <div data-bbox="922 1680 1369 1713"><input type="text"/></div>

C Standardised representation form

1

Equalities and Diversity Monitoring

Would you like to answer our equalities questions?

(please select one answer)

Yes ☐ No ☐

Gender

(please select one answer)

Male ☐

Female ☐

Rather not say ☐

How do you describe your ethnic background?

(please select one answer)

White British ☐

White Irish ☐

White Polish ☐

Any other White background ☐

White & Black Caribbean ☐

White & Black African ☐

White & Asian ☐

Any other mixed background ☐

Indian ☐

Pakistani ☐

Bangladeshi ☐

Any other Asian background ☐

Caribbean ☐

African ☐

Any other Black background ☐

Chinese ☐

Gypsy ☐

Rather not say ☐

1 Telford & Wrekin Local Plan - Representation Form Reg 18

Do you have any long-standing illness or disability that limits your daily activity?

(please select one answer)

Yes ☐

No ☐

Rather not say ☐

Age

Do you mind telling me which age group you are in?

(please select one answer)

0-11 ☐

12-18 ☐

19-25 ☐

25-39 ☐

40-64 ☐

Over 65+ ☐

Rather not say ☐

What is your sexual orientation?

(please select one answer)

Straight/Heterosexual ☐ Lesbian / Gay ☐ Bi-sexual ☐ Other ☐ Prefer not to say ☐

..... ☐

Do you belong to any particular religion or hold particular beliefs?

(please select one answer)

Christian ☐ Muslim ☐ Sikh ☐ Hindu ☐ No Religion ☐ Prefer not to say ☐

..... ☐

Do you identify as the gender you were assigned at birth?

(please select one answer)

Yes ☐ No ☐ Prefer not to say ☐

..... ☐

Are you currently married or in a civil partnership?

(please select one answer)

Yes ☐ No ☐ Prefer not to say ☐

..... ☐

Are you pregnant or within 26 weeks of the birth of a child?

(please select one answer)

Yes ☐ No ☐ Prefer not to say ☐

..... ☐

D Consultation events

In addition to the approach above set out in the SCI, the Council's Customer, Community & Partnership Scrutiny Committee recommendations were also taken into account including deeper Parish engagement resulting in 20 Town & Parish Council events, 4 resident group / forum meetings and 5 x Open Consultation Events.

Table 5

Open Consultation Events	
Town & Parish Council meetings / Open Public meetings	<p>20 Town & Parish Council events;</p> <p>August</p> <p>12th - Newport Public Open Event – 11 Attendees</p> <p>12th - Newport Town Council meeting – 13 Attendees</p> <p>17th - Ercall Magna Parish Council Meeting – 10 Attendees</p> <p>26th - Waters Upton Public Open Event – 31 Attendees</p> <p>26th - Wellington Town Council Meeting – 7 Attendees</p> <p>26th - 5 Named Settlements (Clerks & Chairs of Waters Upton, Edgmond, High Ercall, Tibberton & Cherrington and Lilleshall) – 14 Attendees</p> <p>September</p> <p>1st - Lawley & Overdale Parish Council - 11 Attendees</p> <p>2nd - Lilleshall Public Open Event - 35 Attendees</p> <p>3rd - Tibberton & Cherrington Public Open Event – 22 Attendees</p> <p>7th - Madeley Town Council – 17 Attendees</p> <p>7th - Church Aston Parish Council – 12 Attendees</p> <p>7th - Donnington & Muxton Public Open Event – 11 Attendees</p> <p>8th - Wrockwardine Wood & Trench Parish Council – 11 Attendees</p> <p>14th - The Gorge Public Open Event – 47 Attendees</p> <p>15th - Edgmond Parish Council – 53 Attendees</p> <p>16th - St Georges & Priorslee Public Open Event 16 Attendees</p> <p>16th - Dawley Hamlets Parish Council – 9 Attendees</p>

D Consultation events

Open Consultation Events	
	<p>21st - Great Dawley Public Open Event – 16 Attendees</p> <p>21st - Oakengates Town Council - 10 Attendees</p> <p>23rd - Chetwynd Aston & Woodcote Parish Council – 8 Attendees</p>
Resident Groups	<p>2 Residents groups meetings;</p> <ul style="list-style-type: none"> - Residents of the Hem - Old Park Residents Group
Forums	<p>2 Forum events</p> <ul style="list-style-type: none"> - 16th September Young Person's Forum - 21st September Senior Citizen's Forum
Open Consultation Events	<p>5 Open Consultation Events;</p> <p>11th August, Public Open Events 11-1pm & 6-8pm</p> <p>8th September, Public Open Events 11-1pm & 6-8pm</p> <p>8th September, House Developers and their Agents 3:30-5pm</p>

E Number of comments made

The tables below show the number of comments made on policies and site allocations during the consultation in support, objection or as a general comment.

Table 6

Policy	Total number of comments	Support	Objection	General Comment
SP1	55	14	17	24
SP2	13	0	6	7
SP3	22	4	9	9
SP4	22	4	5	12
EC1	13	2	4	7
EC2	4	0	1	3
EC3	6	1	1	4
EC4	9	1	1	7
EC5	9	0	5	4
EC6	5	0	3	2
EC7	0	0	0	0
EC8	2	0	2	0
EC9	0	0	0	0
EC10	12	2	7	3
EC11	7	1	2	4
EC12	6	1	2	3
EC13	5	1	2	2
HO1	41	5	26	10
HO2	46	6	29	11
HO3	12	1	9	2
HO4	8	1	2	4
HO5	18	1	8	9

E Number of comments made

Policy	Total number of comments	Support	Objection	General Comment
HO6	12	3	0	9
HO7	9	3	3	3
HO8	3	3	0	0
HO9	1	0	1	0
HO10	40	7	18	15
HO11	7	4	1	2
NE1	9	3	2	4
NE2	5	3	0	2
NE3	30	10	11	9
NE4	13	7	2	4
NE5	7	5	0	2
NE6	14	12	0	2
NE7	8	5	1	2
NE8	5	2	1	2
COM1	3	0	1	2
COM2	11	5	1	5
C1	11	3	0	8
C2	6	3	0	3
C3	2	1	0	1
C4	3	1	1	1
C5	3	2	0	1
C6	13	6	1	6
C7	4	2	2	0
C8	4	3	0	1
C9	1	0	0	1
BE1	7	2	1	4

Policy	Total number of comments	Support	Objection	General Comment
BE2	5	2	1	3
BE3	2	1	0	1
BE4	5	3	0	3
BE5	3	0	0	3
BE6	7	1	1	6
BE7	3	1	0	2
BE8	2	0	0	2
BE9	2	1	1	0
BE10	0	0	0	0
ER1	20	2	2	16
ER2	5	1	1	3
ER3	3	0	0	3
ER4	3	0	1	2
ER5	0	0	0	0
ER6	3	1	0	2
ER7	9	2	1	6
ER8	1	1	0	0
ER9	1	1	0	0
ER10	6	2	0	4
ER11	3	0	0	3
ER12	1	0	0	1

Table 7

Site Allocations	Total number of comments	Support	Objection	General Comment
H1	53	3	11	39
H2	10	0	8	2

E Number of comments made

Site Allocations	Total number of comments	Support	Objection	General Comment
H3	2	0	1	1
H4	3	1	1	1
H5	45	1	27	17
H6	3	0	2	1
H7	0	0	0	0
H8	1	0	1	0
H9	0	0	0	0
H10	35	0	25	10
H11	3	1	1	1
H12	2	1	1	0
H13	11	0	9	2
H14	3	1	1	1
H15	3	1	1	1
H16	16	1	1	14
H17	6	1	3	2
E1	1	1	0	0
E2	0	0	0	0
E3	1	1	0	0
E4	0	0	0	0
E5	1	1	0	0
E6	1	1	0	0
E7	0	0	0	0
E8	0	0	0	0
E9	1	1	0	0
E10	1	1	0	0
E11	1	1	0	0

Site Allocations	Total number of comments	Support	Objection	General Comment
E12	1	1	0	0
E13	0	0	0	0
E14	0	0	0	0
E15	0	0	0	0
E16	1	1	0	0
E17	0	0	0	0
E18	9	1	1	7
E19	1	1	0	0
E20	1	1	0	0
E21	1	1	0	0
E22	1	1	0	0
E23	0	0	0	0
E24	0	0	0	0
E25	0	0	0	0
E26	0	0	0	0
E27	9	1	7	1
E28	2	1	1	0

These statistics are based on the first question of the consultation asked 'which section of the plan does your comment relate to?' It maybe that in the text, some comments referred to multiple issues.

F Alternative sites

Table 8

Comment ID	SHLAA ID	Address	Summary objection	Justification Council	Previously assessed?	Action
TWLPC84	351	Rear of Wellington Road	The site could be delivered immediately contrary to H1	The Council can demonstrate more than a 5 year land supply. It will need sites for the medium to long term. In addition, the site is not sustainably located.	yes	
TWLPC488	803	Lightmoor Road	Development control, highways, tree officer and ecology stated that the principle of development on the site is acceptable	The site is on a flood plain, a wildlife site and contains a scheduled monument.	yes	
TWLPC988	TWC/2014/0236	12 Tibberton, Tibberton	The site is available, deliverable and in a suitable location	The site located is located in the rural area	no	to be assessed
TWLPC865/ TWLP1011	575	Land at Audley Avenue adjacent to SHLAA Site 448	The site is deliverable	The site has an irregular shape, protected trees on site and forms a buffer to the bypass	yes	
TWLPC701	601	Land at Muxton Lane, Muxton	The site should be allocated if H1 is undeliverable or changes	The site is outside of the built up area and has insufficient infrastructure. It also affects Lilleshall	yes	

Comment ID	SHLAA ID	Address	Summary objection	Justification Council	Previously assessed?	Action
				Village Strategic Landscape.		
TWLPC831	31	Land off Grange Lane	The site should be included in built up area boundary	The site has poor access and is not suitable to come forward.	yes	
TWLPC838	56	Apley Home Farm	Development should be within the urban area	The site is located in the green network	yes	
TWLPC1574/ TWLPC1554	361	Land at Wappenshall	The sites are more sustainable than other sites allocated or with planning permission	The sites do not fit with the strategy of the Local Plan to direct development to the East	yes	
	611	Racecourse Site, Wappenshall Lane				
TWLPC1744	350	Muxton	Sites should be included in H1 allocation	Not included in H1 as it affects Lilleshall Village Strategic Landscape, is less sustainable than other sites and not needed to meet the housing requirement of the Local Plan	yes	
	351					
	901					
	902					
TWLPC1757	344	Land at Wellington Road, Lightmoor	The site is sustainable	The site is not needed to meet the housing need and might not be deliverable due to mineshafts.	yes	

F Alternative sites

Comment ID	SHLAA ID	Address	Summary objection	Justification Council	Previously assessed?	Action
	772			Site 772 is below the site threshold and therefore not assessed.	no	
TWLPC1765	754 (1/4 only)	Land to the west of the A5223, Horsehay	The site is suitable and sustainable	The site is located outside of the urban area. The Local Plan directs development to the east of Telford.	partly (1/4)	Revise boundary and re-assess site
TWLPC1826	463	West of Little Wenlock	Could help achieve Policies EC11 and EC12	The site is located in the rural area in a non-sustainable location	yes	
TWLPC1690	16	Bratton Farm, Wellington	The site is sustainable, suitable and deliverable	The site is less sustainable site, 45% of the site is in a flood plain	yes	
TWLPC1813	617	Plough Farm and Nursery, Newport	Land should be allocated for housing instead of identified as green network	The site is green network and not balanced	yes	update site to recognise green network
	374	Sites 42 & Plough Farm and Nursery, Newport			no	new site assessment form
TWLPC1811	103	Land Off Cappelquin Drive	Site needed to meet housing requirement	The site has a less sustainable location away from centres	yes	

Comment ID	SHLAA ID	Address	Summary objection	Justification Council	Previously assessed?	Action
TWLPC1811	390	Land off St Peters Primary School, Edgmond	Site needed to meet housing requirement	The site is located in the rural area	yes	
TWLPC1811	813	Land to the east of Muxton	Site needed to meet housing requirement	The sites are less sustainable, they affect Lilleshall Village Strategic Landscape	yes	
	630		Site needed to meet housing requirement			
	446		Site needed to meet housing requirement			
TWLPC1811	800	Land at Mill Lane, Tibberton	Site needed to meet housing requirement	The site is listed as a commitment	no	
TWLPC1811	371	Garfield Road, Ketley Bank	Site needed to meet housing requirement	The sites are currently in use, which makes deliverability uncertain	yes	
	502					
TWLPC1811	803	Former Concrete Works, Lightmoor Road, Lightmoor	Site needed to meet housing requirement	The site is constrained. It contains a flood plain, a wildlife site and a scheduled monument	yes	
TWLPC141	19	Land at Stafford Road, Newport	Sites are close to public transport and primary school	Sites are not needed to meet the housing requirement for Newport	yes	
TWLPC141	373	Land south of Islington (old showground), Newport	Site assessment form incorrect	The site is small and located outside of the urban area	yes	update site assessment

F Alternative sites

Comment ID	SHLAA ID	Address	Summary objection	Justification Council	Previously assessed?	Action
TWLPC186	393	Site 1 - D, South East of Granville Roundabout	PDL site	The site is located on industrial estate unsuitable for housing	yes	
TWLPC186	407	Land at Granville, Donnington	PDL site	The site is constrained which makes delivery uncertain	yes	
TWLPC664	29	Tweedale Industrial Estate, Madeley	Site is discussed with LDP steering group	The site is constrained which affects viability	yes	
TWLPC727	357	Hadley Quarry	Planning permission has expired	Allocation not needed, large part is unsuitable for development	yes	
TWLPC1129	762	Shropshire Star, Ketley Business Park, Ketley	PDL site	The site has an existing employment use which affects viability	yes	
TWLPC1478	435	Land West of Lawley	Sustainable extension to Telford	The strategy directs development to the east, the Wrekin Forest Strategic Landscape should be protected. The site is located outside of the built up area.	yes	
TWLPC1653	434	High Ercall North	The site is in line with the NPPF	The site is located in the rural area in a non-sustainable location	yes	

Comment ID	SHLAA ID	Address	Summary objection	Justification Council	Previously assessed?	Action
TWLPC1732	658	Land north of Redhill, Watling Street	The site is sustainable	The site is not needed to meet the housing requirement of the Local Plan	yes	
TWLPC1818	24	Land At Glebe Street	The site has potential and is deliverable	Allocation of a site this size is not needed	yes	
TWLPC1818	342	Land at Chartley, Newport	The site has potential and is deliverable	The site is located outside of the urban area, and not balanced with existing commitments	yes	
TWLPC1811	507	Land at Barnfield Farm	Site needed to meet housing requirement	The site is not in a sustainable location	yes	
TWLPC895	454	Land at Kingsland Arleston	Fails to recognise PP on form, also more sustainable	The site is listed as a commitment	yes	update site assessment
TWLPC1882	363	land at Church Road, Lilleshall,	Sites could deliver rural affordable housing	The sites are outside a rural village and not considered to be suitable for housing. Should further affordable exception schemes come up, they will be assessed accordingly.	No	under size threshold
	771				Yes	