



TELFORD & WREKIN LOCAL PLAN SUBMISSION VERSION

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

June 2016

enfusion



Telford & Wrekin Council Local Plan Submission Version

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

**Habitats Regulations Assessment (HRA) Report is
available separately**

Integrated Appraisal Report

June 2016

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Non-Technical Summary (NTS)

This is the NTS of the Integrated Appraisal Report

1. This is the Non-Technical Summary of the Integrated Appraisal Report documenting the process of Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA), Health Impact Assessment (HIA), and Equality Impact Assessment (EqIA) within an Integrated Appraisal for the Telford and Wrekin Local Plan. This summary is an integral part of the Integrated Appraisal Report that accompanies the Telford and Wrekin Local Plan on Submission to the Secretary of State for independent examination in June 2016. It provides an outline of the IA process and findings, including how the IA has influenced the development of the plan, and in accordance with the requirements of the National Planning Policy Framework, the European SEA Directive and UK guidance on SA / SEA.

The Telford and Wrekin Local Plan

2. The Local Plan sets out an overall strategy to guide development across the borough in the period up to 2031. It sets out how much new development (land for housing and employment) is needed and where this development should take place as well as provides information about the infrastructure (roads, schools, open spaces, etc) needed to support new development.
3. The Local Plan has been prepared in accordance with national planning requirements and informed by various technical studies, the IA, and the responses to consultation with the public, stakeholders and the regulators. The Local Plan sets out the key challenges for the plan area and a Vision for the development of the area until 2031. This is followed by Strategic Aims and Objectives to deliver the Vision, which are set out in the Table below:

Economy
Aim 1: Promote prosperity and opportunity for everyone Objectives: 1. Support the delivery of at least 76 hectares of employment land on a range of sites across the borough; 2. Support and enhance the network of urban centres as the focus for local business, shopping, community facilities and residential development well served by public transport, walking and cycling, with Telford Town Centre being the sub-regional centre for the borough; 3. Consolidate and strengthen Newport's role as a Market Town; 4. Support and enable the development of rural enterprises; 5. Expand the leisure, tourism and business visitor offer supporting Destination Telford; 6. Support actions to sustain business and equip the local workforce for future opportunities; 7. Support measures which reduce youth unemployment and promote employment.
Housing
Aim 2: Meet local housing needs and aspirations Objectives: 8. Support delivery of 15,555 new dwellings across the whole borough by 2031;

9. Make sure new developments deliver a range of housing types and tenures that meet the needs of specific household groups;
10. Ensure an appropriate proportion of new dwellings are affordable;
11. Improve the quality of new and existing housing;
12. Meet the identified housing needs of Gypsies and Travellers.

Natural Environment

Aim 3: Harness the borough's natural environment

Objectives:

13. Make sure that the natural environment is planned, designed and managed to meet site, local and strategic needs;
14. Make sure that Strategic Landscapes are protected and managed appropriately;
15. Safeguard and enhance the borough's biodiversity.

Community

Aim 4: Promote socially cohesive, healthy and active communities

Objectives:

16. Enable healthier lifestyles and improve the health and wellbeing of the population;
17. Address social and economic deprivation;
18. Enhance the borough's education and training facilities;
19. Support the creation of safe and secure environments;
20. Enable people to live independently for longer;
21. Sustain and enhance the vitality of rural settlements.

Connections

Aim 5: Enhance the infrastructure for improved access and communication

Objectives:

22. Support the continued provision of an accessible and integrated transport network, including links to regional and national destinations;
23. Encourage and help enable greater access by non-vehicular means to local green space, services and locations of employment;
24. Enhance broadband and mobile networks across the borough.

Built Environment

Aim 6: Value the cultural and heritage assets

Objectives:

25. Achieve high quality urban design which responds to local context and which provides opportunities for innovation;
26. Safeguard the character and setting of the borough's built and natural heritage, including Ironbridge Gorge World Heritage Site and the Wrekin;
27. Protect and enhance the borough's local distinctiveness.

Environmental Resources

Aim 7: Reduce the environmental impact of new development

Objectives:

28. Promote solutions that reduce energy demands on non-renewable energy sources;
29. Safeguard the borough's limited mineral resources for future generations;
30. Support measures to increase household recycling rates;
31. Make sure development mitigates for and enables adaption to the effects of climate change;
32. Encourage the most efficient use of existing land and buildings to meet local needs;
33. Protect the borough's water supply and quality and reduce the risk of flooding.

4. The Telford and Wrekin Local Plan contains 65 policies that are broken down into sections relating to the spatial strategy of development, economy, housing, natural environment, community, connections, the built

environment, and environmental resources. The Local Plan also includes proposals for monitoring and review.

SA and Integrated Appraisal: Strategic Environmental Assessment (SEA), Habitats Regulations Assessment (HRA), Health Impact Assessment (HIA), and Equality Impact Assessment (EqIA)

5. The purpose of Sustainability Appraisal (SA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Development Plans. This requirement for SA is in accordance with planning legislation¹ and paragraph 165 of the National Planning Policy Framework. Local Plans must also be subject to Strategic Environmental Assessment^{2 3} (SEA) and Government advises^{4 5} that an integrated approach is taken so that the SA process incorporates the requirements for SEA - and to the same level of detail.
6. For the SA of the Telford and Wrekin Local Plan, an integrated process has been undertaken that also addresses health and equality issues⁶ alongside the requirements of the Habitats Directive⁷ and Regulations⁸. The findings of the health impact assessment have been integrated into the Sustainability Appraisal. The Habitats Regulations Assessment is reported separately; however, the findings informed the wider IA. The Council has commissioned independent specialist consultants Enfusion to progress the integrated appraisal work in January 2015.
7. SA is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA⁹. Initially the scope of the SA is determined by establishing the baseline conditions and context of the Plan area, by considering other relevant plans and objectives, and by identifying issues, problems and opportunities for the area. From this scope the SA is prepared and includes an SA Framework of objectives for sustainable development in the Plan area, this forms the basis against which the Local Plan is assessed.

¹ Section 19(5) of the 2004 Act and Regulation 22(a) of the Town and Country Planning (Local Planning)(England) Regulations 2012

² EU Directive 2001/42/EC

³ Environmental Assessment of Plans and Programmes Regulations, 2004

⁴ DCLG - National Planning Practice Guidance' 2014, ODPM - 'A Practical Guide to the SEA Directive' 2005, Planning Advisory Service – 'The Principles of Plan Making Chapter 6 - The Role of Sustainability Appraisal' 2013

⁵ DCLG, 2012 National Planning Policy Framework

⁶ To demonstrate compliance with the Equality Act, 2010

⁷ EU Directive 1992/43/EEC (and see also NPPF paragraphs 14 & 117)

⁸ The Conservation of Habitats & Species Regulations (as amended) 2010

⁹ ODPM A Practical Guide to the SEA Directive 2005

Sustainability characteristics of the Telford and Wrekin Plan area and likely evolution without the Plan

8. Baseline information about the Plan area has been collected and updated since the onset of the plan-making and SA processes. Relevant and sufficient information on the present and future state of the area has been collected in order to adequately predict the potential effects of implementing the Local Plan on the area. Baseline analysis provides the basis for making judgements about how the emerging content of the Plan might hinder or progress objectives for sustainable development. This information is updated when necessary as part of the iterative and on-going IA process.
9. **Water Resources, Water Quality and Flooding:** The principal source of surface water within the borough is the River Severn. Further stretches of rivers within the borough include the rivers Tern, Roden, Meese, and Strine, which all form part of the Shropshire Middle Severn Catchment. The borough falls primarily within the Shelton Water Resource Zone and there will be a reduction in the surplus of available water in 2024/25 following the revocation of three extraction licenses. A Detailed Water Cycle Study¹⁰ has identified that the Newport, Coalport, Waters Upton and Crudgington Waste Water Treatment Works are very highly constrained. Waterbodies serving the study area are predicted to be unable to achieve 'good status' by the end of 2015, and the new target by which to reach this is now 2027. Almost all of Telford and Wrekin is a Nitrate Vulnerable Zone with a need to protect and enhance water resources.
10. The Environment Agency's River Severn Catchment Flood Management Plan¹¹ identifies Telford and Wrekin as an area that requires further action to reduce flood risk. The West Midlands Regional Flood Risk Assessment¹² (RFRA) restricts development on areas affected by the long-term North Shropshire Tributaries Policy of increasing flood risk in areas which are currently used for agriculture. Surface water and drainage system problems are also identified as an issue for the borough. The RFRA recommends that development takes place within Flood Zone 1 where possible and that Sequential and Exception Testing is undertaken for all new sites. Without the Plan there would be greater pressure on water resources and quality, and potentially increased flood risk.
11. **Biodiversity:** There are no Ramsar, Special Protection Areas (SPAs) or Special Areas of Conservation (SACs) within the Plan area, however there are five internationally designated sites within 20km of the Plan area boundary. There are 8 Sites of Special Scientific Interest (SSSIs) within the borough, as well as 5 Local Nature Reserves (LNRs), 26 Local Geological Sites and over 1000 ha of Wildlife Sites. 71% of the SSSIs met the public service agreement target when last surveyed in 2010, and just under half of the Wildlife Sites in the borough are in positive management. Many of these sites however exist as small

¹⁰ Produced by Amec on behalf of Telford & Wrekin Council (2014) Detailed Water Cycle Study, Final Report.

¹¹ EA (2009) River Severn Catchment Flood Management Plan [online]
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289103/River_Severn_Catchment_Management_Plan.pdf [accessed July 2015]

¹² Halcrow, 2009: The West Midlands Regional Flood Risk Assessment

pockets within urban areas so the habitat is fragmented. Several of the Local Geological Sites are associated with the Wenlock AONB and as such will receive indirect protection through that mechanism. Without the Plan there will be less protection for locally important biodiversity and less likelihood for enhancements to green infrastructure with its benefits for both people and wildlife. Without the Plan there may also be increased fragmentation of habitats.

12. **Cultural Heritage:** The borough has a range of heritage assets including; Ironbridge Gorge World Heritage Site (the boundary of which coincides with the Severn Gorge Conservation Area boundary), 29 Scheduled Monuments, 3 Registered Historic Parks and Gardens, 7 Conservation Areas and approximately 800 Listed Buildings. A network of disused canals exist and areas of this are protected for recreational use; the Newport branch of the Shropshire Union Canal has been listed nationally as worthy of long term restoration for leisure use. The Buildings at Risk Register¹³ records five buildings and 8 Scheduled Monuments as being 'at risk' in the Plan area. Without the Plan future development is likely to have greater adverse effects on the setting of heritage assets.
13. **Landscape and Visual Amenity:** An area of the Shropshire Hills AONB extends into Telford and Wrekin to include the Wrekin, which is recognised for scenic quality, views, tranquility, diversity and culture. The Plan area is located in the Mid Severn Sandstone Plateau, and around 40% of the borough is green open space. The urban townscape therefore is characterised by the existence of greenery and vegetation as well as considerable areas of low density suburban development. Without the Plan future development is likely to have greater adverse effects on landscapes and the townscape.
14. **Energy and Climate Change:** Although there has been a reduction in the amount of domestic energy and gas consumed across the borough, a Local Economic Assessment¹⁴ has identified that the physical electricity supply cable network is insufficient to enable some companies to run all their machines at the same time and research showed examples of businesses only operating certain machines in the morning or afternoon and having created their own generation facilities to 'top up' that available from the Grid. The areas of Telford and Wrekin most strongly associated with fuel poverty are the wards of; Donnington, Wrockwardine Wood, Trench, St Georges, Ketley, Oakengates, Malinslee, Dawley Magna and Madeley. The total micro-generation installed in Telford and Wrekin is 0.081MWe, 86% of which is photovoltaic and 14% wind. Without the Plan adaptation and mitigation of the effects of climate change will be less.
15. **Air Quality:** The main sources of air pollution are emissions from busy roads (particularly along the Ironbridge Gorge) and also from emissions from the power station at Ironbridge. Total emissions per resident per year is slightly less than the UK average, and were no measured exceedances of the National Air Quality Strategy Objectives in 2011. Without the Plan it is likely that there

¹³ Historic England [online] Heritage at Risk Register

¹⁴ Telford & Wrekin ,2011: Local Economic Assessment Supporting Information

would be a less coordinated approach between development and transport infrastructure with the potential for greater negative effects on air quality.

16. **Infrastructure, Transport and Accessibility:** Telford and Wrekin has high quality road infrastructure and connections and the M54 traverses the centre of the District. Bus routes create connections within the borough, and there are 3 train stations at Telford Central, Wellington and Oakengates. The low density of development across Telford and Wrekin however makes the provision of public transport services difficult. Combined with previous policies promoting the segregation of land uses in Telford, travel other than by car is less attractive and prohibits access to jobs and services. The borough, particularly the rural areas, is also poorly served by broadband networks. Without the Plan there is less likely to be any coordinated delivery of improvements to the transport infrastructure with negative effects likely on traffic and pollution.
17. **Land, Minerals and Waste:** Shallow coal measures are recorded in the Central Telford area and development in this area should consider land stability and surface hazards resulting from past mining operations. There is currently no sand and gravel working in the borough, although a single site produces crushed rock. The Shropshire Core Strategy¹⁵ identifies that sufficient crushed rock aggregate resources exist from permitted sites, but that additional sand and gravel resources may be required up to 2026. There was a reduction in waste generated in the borough between 2005 and 2010, and 2009 / 10 figures show around 41% of waste was recycled in that year. Overall around 1 million tonnes of controlled wastes are generated each year in the borough, around 10% of which is municipal waste. Development is likely to increase waste generated as well as minerals and land required; this is likely to be more significant if not coordinated through the planning and design of development in the Local Plan.
18. **Housing:** 5,554 new homes were completed between 2006 and 2015, of which roughly 33% were affordable homes. In general, Telford has lower property values and higher proportions of social and privately rented housing. By contrast the rural area has higher property values and more owner occupation. Newport falls between the two. There are over 17,000 people on the housing register and a significant shortfall in social and affordable housing exists despite a good supply of land. The 2010 Housing Strategy¹⁶ estimated around 5% of households were in fuel poverty, 22% of households had one or more residents living with a disability, and 2.3% of dwellings were overcrowded. Without the Plan providing the planning framework for housing development up to 2031, the needs of the borough might not be met and the trend in a shortage of affordable and social housing could continue or increase. It also means that housing might not be located in the most sustainable areas (close to employment, sustainable transport, facilities and services) or where it is most needed.
19. **Healthy Communities and Equality:** The population of the borough is estimated to be 168,000 people in 2014. The proportion of the population aged over 65 years increased by 22% between 2000 and 2009, however this

¹⁵ Shropshire Council, 2011: Adopted Core Strategy

¹⁶ Telford & Wrekin, 2010: People and Places, Housing Strategy 2010-2013

still remains a lower percentage than the national average. Until 2009 population growth was primarily driven by in-migration, however in 2009 the borough exhibited a net outward migration. The borough has a lower than national average percentage of working age residents with limited or no qualifications, however the unemployment rate in 2011 stood higher than the national rate.

20. Telford and Wrekin is in the top 30% most deprived districts in the West Midlands and in the top 40% most deprived nationally, and around a quarter of residents are living in the 20% most deprived areas in England. Areas within Woodside, Malinslee, Cuckoo Oak, Brookside, Hadley & Leegomery, Dawley Magna, College and Donnington fall with the 10% most deprived areas nationally. The areas with the highest levels of deprivation also have the highest numbers of people reporting poor health. Life expectancy in the borough is increasing, however it remains below the England average. Health services within the borough include the Princess Royal Hospital, around 20 GP Practices and 5 branch surgeries. Without the Plan there would be less coordination between the delivery of housing/employment and associated provision and improvements to services/facilities and sustainable transport modes. This could result in development not being provided in the areas where it is needed most and therefore not as effectively help to tackle deprivation. .
21. **Economy, Employment and Education:** The borough contains around 4,500 businesses, and the service sector is the largest employer accounting for around 78% of all jobs. Manufacturing is part of the area's heritage and remains strong today; polymer and advanced engineering companies now stand alongside traditional manufacturers. Most of the employers in the borough are small and medium sized businesses and in 2009 Telford and Wrekin had the greatest proportion of business start-ups across the region employing 5-9 people. Over the period 1996 to 2008 the area saw an increase in its Gross Value Added (GVA), however this remains below national percentage increases. The majority of jobs available in the borough are located in Telford, most of which are in the large industrial estates of Hadley Park, Halesfield, Hortonwood and Stafford Park, as well as the MOD at Donnington. Telford Town Centre is also the main centre for commercial and professional jobs.
22. The area contains a respected College of Further Education, and two Higher Education establishments. The Wolverhampton University (Telford Campus) at Priorslee is home to the Polymer Cluster Centre and part of the Wolverhampton Telford Technology Corridor. The condition of schools were assessed in 2007/8 and the 2010 Corporate Asset Management Plan¹⁷ identifies a backlog of £25 million for schools and £11 million for operational properties. Without the Plan employment might not be located where it is most needed or in the most sustainable locations; this could lead to a constraint on economic performance for the Plan area. The potential for

¹⁷ Telford and Wrekin Council (2010) Corporate Property Asset Management Plan 2010/2013 [online] <http://apps.telford.gov.uk/CouncilAndDemocracy/Meetings/Download/MTIyMjM%3D> [accessed July 2015]

uncoordinated retail development could also have negative effects on the vitality and viability of town centres.

Key Sustainability Issues, Problems and Opportunities

23. Plans and programmes that could affect the Local Plan were reviewed and considered together with information collected relevant to the characteristics of the borough. From these studies a number of key sustainability issues and opportunities were identified. These are set out in full in the Final SA Scoping Report (June 2013) as well as Section 2 of the main IA Report. The overall key challenges were identified as follows:
- Delivery of a skilled and healthy workforce able to retain/attract the businesses able to expand over the next 15 years.
 - To provide timely capacity for the management of resources and material assets in an efficient manner to underpin economic development and demographic change.
 - To enhance the health of the community and reduce health inequalities to a) address the needs of the increasing elderly population and b) to help deliver a healthy workforce.
 - Develop an understanding of the services provided by the natural environment and value those assets found within Telford & Wrekin to develop a landscape scale or area-wide management strategy.
24. The baseline and review of other plans was updated in 2015 so that the basis for assessment remained current. This also demonstrated that the sustainability issues are still relevant and that the methods of assessment remain applicable.

How has the Telford and Wrekin Local Plan been assessed?

25. An IA Framework was compiled and included IA Objectives that aim to resolve the issues and problems identified for development planning in the Plan area. This IA Framework, together with the baseline information, comprised the basis for assessment, and is summarised in Table below. It should be noted that the IA Framework has been refined and amended to take account of consultation responses received as part of the iterative and on-going IA process.

IA Objective		Appraisal Rationale
Sustainable Economic Development		
1	To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups.	<ul style="list-style-type: none"> • Extent to which policies enhance the employment opportunities of those areas experiencing deprivation and rural isolation.
2	To reduce the number of people with difficulties accessing employment, education and training opportunities.	<ul style="list-style-type: none"> • Improving the ability of people to access employment, education and training opportunities.

3	To ensure an appropriate supply of employment land and starter business premises.	<ul style="list-style-type: none"> To deliver employment land attractive to inward investment and also provide for a range of business units.
4	Improve the supply and affordability of accommodation for all groups in areas of greatest need.	<ul style="list-style-type: none"> Extent to which policies address: affordability issues; size of property needed to retain/attract employees; the needs of an ageing population Provision being made for travellers & gypsies.
5	Locate housing in areas with good accessibility to employment, services and amenities.	<ul style="list-style-type: none"> Extent to which housing sites are served by sustainable transport modes.
Resource Management & Material Assets		
6	To deliver continued reduction in the quantities of waste being generated and the quantities being disposed of at landfill.	<ul style="list-style-type: none"> Extent to which policies promote sustainable construction techniques for new development proposals as demonstrated via evidence such as BREEAM and CEEQUAL. Consider policies that require sufficient land to be allocated to encourage self-sufficiency in waste management and processing within housing and commercial development. Extent to which policies promote the waste hierarchy with the encouragement of re-use and recycling of materials including food wastes across municipal and commercial waste streams.
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.	<ul style="list-style-type: none"> Extent to which policies promote sustainable construction techniques for new development proposals as demonstrated via evidence such as BREEAM and CEEQUAL. Extent to which policies make adequate provision for the storage and recycling of aggregate and building materials.
8	To minimise demand upon water resources and to enable the timely provision of adequate waste water treatment to support increased housing provision.	<ul style="list-style-type: none"> Extent to which policies include measures that require developers to demonstrate how they have reduced water demand. Extent to which policies sequence development such that adequate capacity is available from waste water treatment plans to respond to additional flows.
9	To make travel more reliable and efficient, as well as enhance access to jobs, education, healthcare, shops and leisure.	<ul style="list-style-type: none"> Consider whether policies promote sustainable travel.
10	To work with other service providers to enable the timely	<ul style="list-style-type: none"> Extent to which plans address current and emerging need for community

	provision of community facilities to accord with the delivery of new houses.	facilities, i.e. hospitals, schools, community centres.
Sustainable Communities		
11	To achieve a population profile in balance with the employment opportunities that the travel to work area is able to provide.	<ul style="list-style-type: none"> Extent to which housing, employment and transport and policies assist in moderating the amount of inward and outward commuting.
12	To provide an environment that helps retain well-educated members of the work force.	<ul style="list-style-type: none"> Whether policies contribute towards the retention of mobile professionals.
13	To improve the health and well-being of the population to meet the needs of the vulnerable and ageing population.	<ul style="list-style-type: none"> Whether policies improve access to health facilities. Reduce health inequalities and improve well-being. Extent to which measures encourage walking and cycling, improve access to greenspace targeting those communities experiencing health inequalities. Whether housing policies deliver homes of a decent standard and minimise fuel poverty.
14	To create opportunities for the community to reduce levels of obesity.	<ul style="list-style-type: none"> Whether policies encourage developers to contribute towards local recreational areas such as green gyms
15	To enable vulnerable people to live independently.	<ul style="list-style-type: none"> Whether policies promote the development of care homes and specialist services for the elderly and as well as those suffering from dementia and mobility difficulties.
16	To ensure urban design and layout contributes towards reducing the potential for crime.	<ul style="list-style-type: none"> Whether policies require the designing out crime for new development.
Environmental Sustainability		
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.	<ul style="list-style-type: none"> Whether policies and site allocations protect areas of peat from direct and indirect impacts.
18	To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.	<ul style="list-style-type: none"> Whether policies enhance designated and non-designated habitats and species (e.g. through increased connectivity or reduced disturbance) Extent to which the recreational enjoyment of nature is promoted delivering health benefits to those most deprived communities while not threatening ecological interests.
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	<ul style="list-style-type: none"> Extent to which policies deliver the design and management of open and recreational space in which

	also to contribute to the health and wellbeing of the local population.	people of all ages feel safe and confident to use.
20	To manage the landscape effects of development in recognition of European Landscape Convention.	<ul style="list-style-type: none"> Consider whether policies maintain and enhance the landscape quality, including historic landscape features. Extent to which landscape character and design considerations both current and future are integrated into development policies. Extent to which policies may directly or indirectly affect the special qualities of the AONB.
21	To enhance, conserve and protect the significance of cultural heritage assets and their settings.	<ul style="list-style-type: none"> Whether policies promote conservation or enhancement and access to sites of geological importance. How policies affect the historic environment.
22	To reduce annual CO2 emissions by 60% from 1990 levels, by 2050 (36% by 2026).	<ul style="list-style-type: none"> Whether policies and site allocations contribute towards reducing emissions.
23	To deliver a built environment that is well adapted to cope with the changing weather conditions that are forecast.	<ul style="list-style-type: none"> Extent to which policies promote building form and layout that aid adaptation.
24	Incorporate measures into development proposals that contribute towards a reduction in flood risk aimed at providing a runoff rate less than greenfield rates.	<ul style="list-style-type: none"> Whether policies deliver a reduction in flood risk.

26. Each emerging part of the Plan, including options for distributing housing, employment and infrastructure, potential allocations, and policies to control proposed development, was subject to IA. Using the IA Framework, the baseline information and professional opinion, the likely effects of the Local Plan were assessed. The SA considered positive, negative and cumulative effects according to categories of significance as set out in the Table below.

Categories of Significance		
Symbol	Meaning	Sustainability Effect
- -	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

- | | | |
|--|--|--|
| | | |
|--|--|--|
27. Integrated Appraisal is informed by the best available information and data. However data gaps and uncertainties exist and it is not always possible to accurately predict effects at a strategic plan level. For example, specific significance of effects on biodiversity, heritage assets, or changes to local level traffic flows may depend on more detailed studies and assessments that are more appropriately undertaken at the next stage of planning - at the project or site level. Climate change impacts are difficult to predict as the effects are most likely to be the result of changes at a cumulative and regional / national level, and therefore a precautionary approach that seeks to deliver best practice mitigation and adaptation is the most appropriate approach.

What reasonable alternatives have been considered and assessed?

28. Throughout the development of the Local Plan, alternatives have been considered and appraised through the IA process in an iterative and ongoing way such that the findings of the IA have informed plan-making. In 2013, the Shaping Places Strategy & Options Document¹⁸ proposed three reasonable options for the overall level of growth as well as three options for the distribution of this growth up to 2031. The Shaping Places Strategy & Options Document (2013) also proposed a number of policy issues and options to assist in the preparation of the Local Plan. Key choices were identified and set out as options. Where possible, reasonable alternatives were suggested for some of the proposed options. All of these options were appraised by the Council against the SA Framework with the findings presented in the SA Report that accompanied the Shaping Places Strategy & Options Document in public consultation between June and July 2013. Summary findings along with the reasons for selection and rejection are provided in Section 4 of main IA Report with the detailed appraisal matrices presented in Appendix IV.
29. Following further technical studies relating to the objectively assessed housing and employment needs of the borough in March 2015¹⁹, the Council considered it necessary to reconsider reasonable options for housing growth during the life of the Local Plan. Three options for housing growth were identified in April 2015 and these were subject to an independent appraisal carried out by Enfusion against the full IA Framework of Objectives. Summary findings along with the reasons for selection and rejection are provided in Section 4 of the main IA Report with the detailed appraisal matrices presented in Appendix V.
30. Reasonable options for potential site allocations were identified by the Council in 2014/15 and these were subject to an independent appraisal

¹⁸ Telford & Wrekin Council (2013) Shaping Places Strategy & Options SA Report. Available online: http://telford-consult.objective.co.uk/portal/shaping_places/shaping_places_local_plan/shaping_places_strategy_options?pointId=2476452

¹⁹ Telford & Wrekin Council (March 2015) Objectively Assessed Housing Need Final Report. Prepared by PBA. Available online: http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/911/objectively_assessed_need

carried out by Enfusion against the full IA Framework in March/April 2015. Enfusion worked closely with the Council in Jan/Feb 2015 to develop standards and thresholds to determine the nature and significance of effects against the IA Framework. This ensured that a consistent comparative appraisal of reasonable site options was carried out. Summary findings are provided in Section 4 of the main IA Report with the detailed appraisal matrices presented in Appendix VI. The reasons for the selection or rejection of site options are set out in Appendix IX.

31. Following consultation on the Draft and Publication Version of the Local Plan the Council made a number of changes to the Plan. The findings of the IA for site options were updated to take account of changes to the Plan as well as consultation responses received. The changes made to the appraisal of site options were only minor and did not significantly affect the overall findings for the IA. It should be noted that 3 new site options were proposed through consultation on the Publication Version of the Local Plan. These were subject to IA and summary findings are provided in Section 4 with the detailed matrices presented in Appendix VI. The reasons for the selection or rejection of all site options are set out in Appendix IX.

What are the likely significant effects of the Telford and Wrekin Local Plan?

32. **Housing:** Overall, the Local Plan is considered to have the potential for major short to long-term positive cumulative effects on housing through the provision of around 15,555 new homes to meet the objectively assessed need of the District during the life of the Plan. Housing will be focussed primarily in Telford with a suitable quantity of development directed towards Newport and the rural areas of the borough to meet needs. Local Plan policies will ensure that a suitable mix of homes are provided to meet the needs of all people in the future.
33. **Economy & Employment:** Overall, the Local Plan is considered to have the potential for major short to long-term positive cumulative effects on the economy and employment through the provision of around 76 ha of employment land during the life of the Plan. Major allocations for employment have been distributed across existing strategic employment areas. The Local Plan protects existing employment as well as supports economic growth through both the regeneration of previously developed land as well as development of suitable Greenfield sites. It also seeks to maintain the shopping function of the town, district and local centres and support proposals that enhance their roles.
34. **Health and Equalities:** Overall, the Local Plan is considered to have potential for positive effects on health and equalities by meeting the needs of the borough (including for minority groups, and the delivery of affordable housing), improving accessibility to housing and employment, services and facilities, and recreational and open spaces. It is also recognised that the Plan has the potential for minor negative effects in the short term on health and wellbeing during construction, through increased levels of noise, light and air pollution; however, it is considered that suitable mitigation is available to address these negative effects. The provision of housing and employment will

help to meet the future needs of communities in the Plan area, and the amenity of residents is also protected. It is therefore considered that the Local Plan as a whole will have major positive cumulative effects in the long-term for health and equalities.

35. **Transport and Accessibility:** The Local Plan policies seek to address the impacts of proposed development on the road network and ensure that appropriate infrastructure is provided. The Infrastructure Delivery Plan (IDP) sets out a range of highways and sustainable transport infrastructure that will need to be delivered during the life of the Plan to support proposed development. Local Plan policies also seek to improve public transport and pedestrian routes and encourage the use of sustainable transport modes. These measures, along with the delivery of housing, employment and community facilities / services has the potential for a long-term positive cumulative effect on transport and accessibility.
36. **Air Quality:** It is considered that major negative effects on air quality are unlikely as a result of the Local Plan. Policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes as well as encourage the use of sustainable transport modes. While there may be some localised impacts in the short-term as a result of proposed development, the mitigation proposed through Local Plan policies and predicted trends in air quality will ensure that these are not significant.
37. **Climate Change and Flooding:** Local Plan policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes and encourage the use of sustainable transport modes. These measures along with predicted trends in air quality should ensure that the Local Plan does not have major long-term negative effects on climate change as a result of increased traffic. Fluvial flooding is not a significant issue within the borough, and the most widespread flooding issue affecting development is flooding caused by surface water runoff after heavy rainfall events. Local Plan policies seek to direct development away from areas of flood risk, and seek to ensure that new development does not increase the risk of flooding, which should ensure that there will be no significant negative effects.
38. **Water Resources and Quality:** Given available evidence and predicted constraints the IA found that there is the potential for the Local Plan to have major long term cumulative negative effects on water resources and quality. Mitigation provided through Local Policies and current regulatory processes, such as the WRMP and licensing, should help to ensure that negative effects are not significant but this is uncertain at this stage. There are a number of assumptions and uncertainties in relation to the potential future supply of water and capacity of wastewater infrastructure within and surrounding the plan area. Strong policies and effective co-operation and close involvement with the EA and Severn Trent Water will be vital to ensure that there are no major negative effects. The Council and Local Plan must be flexible in terms of the level and location of growth in the future and ensure that appropriate monitoring is in place to indicate if tipping points have been reached. The IA

recommended that the Local Plan is more aspirational in terms of the level of water use required for any new development.

39. **Natural Environment (Landscape, Biodiversity and Soils):** The level of growth proposed through the Local Plan has the potential for major long term negative effects on the natural environment. To address this, the Local Plan seeks to direct development away from sensitive areas and also protect, enhance and restore the natural environment. The mitigation provided by Plan policies and available at the project level should address negative effects to ensure they are not significant for the landscape or biodiversity; however, the overall cumulative effect of the Local Plan remains uncertain. The Local Plan is likely to lead to the loss of areas of best and most versatile agricultural land, and development is likely to occur in areas which contain mineral resources.
40. **Cultural Heritage:** Overall the Local Plan seeks to protect and enhance heritage as well as avoid development that would have an impact on the significance of heritage assets. It seeks to direct development away from sensitive areas and minimise the impacts of development on important heritage assets. Whilst it is recognised that development has the potential for negative effects on heritage it is also considered that there is the opportunity for positive effects by improving access and signage to heritage assets. There is suitable mitigation available to address negative effects to ensure that they are not significant; however, the overall cumulative effect of the Local Plan on heritage remains uncertain.
41. **Waste and Recycling:** Overall, the Local Plan is considered to have the potential for minor negative cumulative effects on this topic through the provision of new development. Local Plan policies expect development proposals to make sufficient provision for sustainable waste management and they also allow for sufficient flexibility to address increased future demand for waste facilities as a result of proposed development.

How could negative effects be mitigated and positive effects enhanced?

42. An important role of the IA process is to provide recommendations for the mitigation of negative effects and enhancement of the positive effects identified in the appraisal process. These can then be carried forward in the remainder of the plan-making process and can include further recommendations for other development plan documents and for processes including site master planning.
43. In preparing Local Plan policies, Telford & Wrekin Borough Council has sought to mitigate the negative effects of development and maximise the opportunities presented. The proposed policies and site allocations presented in the Local Plan reflect recommendations arising from all the previous IA work undertaken to support the plan development stages. In particular, the findings of the SA guided the selection of potential site allocations by identifying sustainability issues and in particular the cumulative effects of development for wards and sensitive receptors.

44. Potential negative effects are mitigated through strong policies that seek to protect, enhance and restore the natural environment and heritage as well as promote strong sustainable communities through high quality layout and design. The Local Plan ensures that necessary infrastructure and investment is provided at the right times and in the right places to support new development and communities. It also seeks to create a healthy integrated Green Network by supporting development that promotes, protects and enhances green infrastructure as well as ensures ongoing future management.

Consultation

45. The emerging drafts of the Local Plan and its accompanying IA documents have been subject to statutory consultation at the scoping stage with the statutory bodies (Historic England, Environment Agency, and Natural England) and wider consultation with stakeholders and the public. The IA accompanying each stage of plan-making since 2013 has been subject to public consultation through provision of the documents on the Councils' website. Comments made and responses to these comments have been recorded and also made available. Thus consultation has been a vital ongoing and iterative element of the plan-making and the SA processes. The Local Plan and IA Report reflect the findings of various technical studies and the responses received during consultation.

Monitoring Proposals

46. Local planning authorities are required to produce Monitoring Reports (MRs) including indicators and targets against which the progress of the Plan can be assessed. There is also a requirement to monitor the predictions made in the IA and Government advises Councils to prepare a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. Monitoring proposals were suggested in the early SA Scoping stage and have been progressed, including through consultation, as the Local Plan progresses. The Council will prepare a monitoring strategy that will include consideration of any specific requirement from the IA process.

Changes to the Local Plan

47. The Draft Local Plan and IA Report (July 2015) were placed on public consultation from 03 August 2015 to 25 September 2015. As a result of the comments received the Council made a number of changes to the Plan. The majority of these changes were minor and did not significantly affect the overall findings of the previous IA work as they seek to provide further clarification or avoid repetition. This includes the deletion of some policies and merging of others. While the majority of changes are minor and do not significantly affect the findings, it was considered appropriate to update the the IA for the Local Plan Publication Version (Regulation 19), to reflect the proposed amendments including changes to policy numbers. It should also be noted that there were also some minor changes to the appraisals of some site options to reflect the removal of the urban area from proposed mineral

safeguarded areas and a minor change to the boundary of Telford Town Centre.

48. The Local Plan Publication Version and accompanying IA Report were placed on public consultation from 01 February 2016 to 15 March 2016. As a result of the comments received the Council made a number of changes to the Plan. The changes were considered through the SA and found to significantly affect the findings of the previous work as they seek to provide further clarification or avoid repetition. It should be noted that 3 new site options were proposed through the consultation on the Publication Version of the Local Plan. These options were subject to SA and the reasons for selection or rejection

Summary and Next Steps

49. The IA of the Local Plan has appraised the effects of individual policies and development allocations as well as the overall effects of the plan, including cumulative effects. The Appraisal has identified that the Local Plan will contribute to dealing with identified sustainability issues in the area, with major positive effects particularly for communities through the allocation of a range of new housing and employment land, together with improvements to Green Infrastructure and transport links. The key negative effects relate to the cumulative effects arising from the amount of development growth, particularly the environmental impacts of this level of growth. Overall, the policies and proposed locations provide a strong positive framework to guide sustainable development in the Plan area up to 2031.
50. The Local Plan will be submitted to the Government for inspection in June 2016, supported by evidence including the IA Reports. The Secretary of State will call an Examination in Public, chaired by an independent Inspector, to examine the Local Plan and consider the issues that have been raised by the consultation.

1.0 Introduction

Purpose of Integrated Appraisal (IA) & the Integrated Appraisal Report

- 1.1 The purpose of Integrated Appraisal (IA) is to promote sustainable development through the integration of environmental, social and economic considerations in the preparation of Local Plans. This requirement for IA is in accordance with planning legislation²⁰ and paragraph 165 of the National Planning Policy Framework (NPPF). Local Plans must also be subject to Strategic Environmental Assessment^{21, 22} (SEA) and Government advises^{23,24} that an integrated approach is taken so that the SA process incorporates the requirements for SEA - and to the same level of detail. This IA Report is part of the evidence base for the Local Plan and it accompanies the Telford & Wrekin Local Plan Publication Version on public consultation.

Background to the Local Plan and IA

- 1.2 Telford & Wrekin Council is preparing a Local Plan to guide future development in the Local Authority area. In accordance with the requirements of the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework 2012, the Council must carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of its Local Plan. The SA/SEA of the Local Plan has been on-going since 2011 and is being undertaken alongside the preparation of the plan. The plan-making and SA/SEA processes to date are summarised in the table below:

Table 1.1: Local Plan and IA documents

Local Plan Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
Evidence gathering	Draft SA Scoping Report May 2012 Six weeks statutory & public consultation from 21 May to 02 June 2012
Shaping Places Strategy & Options June 2013 Public consultation from 10 June to 26 July 2013	Final SA Scoping Report June 2013 Public consultation from 10 June to 26 July 2013 Strategy & Options SA Report June 2013 Public consultation from 10 June to 26 July 2013
Proposed Housing and Employment Sites May 2014	

²⁰ Section 19(5) of the 2004 Act and Regulation 22(a) of the Town and Country Planning (Local Planning)(England) Regulations 2012

²¹ EU Directive 2001/42/EC

²² Environmental Assessment of Plans and Programmes Regulations, 2004

²³ DCLG - National Planning Practice Guidance' 2014, ODPM & 'A Practical Guide to the SEA Directive' 2005, Planning Advisory Service – 'The Principles of Plan Making Chapter 6 - The Role of Sustainability Appraisal' 2013

²⁴ DCLG, 2012 National Planning Policy Framework

Public consultation from 06 May to 17 June 2014	
Draft Local Plan Public consultation from 03 August to 25 September 2015	Draft Local Plan IA Report Public consultation from 03 August to 25 September 2015
Local Plan Publication Version Public consultation from 01 February 2016 to 15 March 2016.	Local Plan IA Report Public consultation from 01 February 2016 to 15 March 2016.
Local Plan Submission Version Submitted in June 2016 to be examined by an independent inspector	Local Plan IA Report (this report) Submitted alongside the Local Plan in June 2016 to be examined by an independent inspector

The Telford & Wrekin Local Plan

- 1.3 The emerging Local Plan for the borough of Telford & Wrekin covers the period from 2011 to 2031. It replaces the *Core Strategy* (2007) and the policies which were saved from the *Wrekin Local Plan* (2000) and the *Central Telford Area Action Plan* (2011). The Local Plan will set out an overall strategy to guide development across the borough in the period up to 2031. It sets out how much new development (land for housing and employment) is needed and where this development should take place as well as provides information about the infrastructure (roads, schools, open spaces, etc) needed to support new development.
- 1.4 The aim of the Local Plan is to help sustain and enhance the quality of the borough and the quality of life for those who live and work in and visit the borough. The vision is summarised as follows:
- By 2031, Telford & Wrekin will be a healthier, more prosperous and better connected place than it is today.
 - It will have a population of approximately 198,000 people.
 - Development and regeneration will be focused in Telford and Newport.
 - Communities in the rural area will supported.
 - The environment will be protected and improved.
 - New development and investment will provide a high quality of life for those who live and work in and visit the area.
- 1.5 The aims and objectives are an expansion of the vision and provide the basis for the Spatial Strategy and the Detailed Policies. They also respond to the wider strategies and priorities of the Council and its partners such as the Health and Wellbeing Strategy. The Local Plan aims and objectives are set out in the table below.

Table 1.2: Local Plan Aims & Objectives

Economy
Aim 1: Promote prosperity and opportunity for everyone Objectives: 1. Support the delivery of at least 76 hectares of employment land on a range of sites across the borough;

2. Support and enhance the network of urban centres as the focus for local business, shopping, community facilities and residential development well served by public transport, walking and cycling, with Telford Town Centre being the sub-regional centre for the borough;
3. Consolidate and strengthen Newport's role as a Market Town;
4. Support and enable the development of rural enterprises;
5. Expand the leisure, tourism and business visitor offer supporting Destination Telford;
6. Support actions to sustain business and equip the local workforce for future opportunities;
7. Support measures which reduce youth unemployment and promote employment.

Housing

Aim 2: Meet local housing needs and aspirations

Objectives:

8. Support delivery of 15,555 new dwellings across the whole borough by 2031;
9. Make sure new developments deliver a range of housing types and tenures that meet the needs of specific household groups;
10. Ensure an appropriate proportion of new dwellings are affordable;
11. Improve the quality of new and existing housing;
12. Meet the identified housing needs of Gypsies and Travellers.

Natural Environment

Aim 3: Harness the borough's natural environment

13. Make sure that the natural environment is planned, designed and managed to meet site, local and strategic needs;
14. Make sure that Strategic Landscapes are protected and managed appropriately;
15. Safeguard and enhance the borough's biodiversity.

Community

Aim 4: Promote socially cohesive, healthy and active communities

Objectives:

16. Enable healthier lifestyles and improve the health and wellbeing of the population;
17. Address social and economic deprivation;
18. Enhance the borough's education and training facilities;
19. Support the creation of safe and secure environments;
20. Enable people to live independently for longer;
21. Sustain and enhance the vitality of rural settlements.

Connections

Aim 5: Enhance the infrastructure for improved access and communication

Objectives:

22. Support the continued provision of an accessible and integrated transport network, including links to regional and national destinations;
23. Encourage and help enable greater access by non-vehicular means to local green space, services and locations of employment;
24. Enhance broadband and mobile networks across the borough.

Built Environment

Aim 6: Value the cultural and heritage assets

Objectives:

25. Achieve high quality urban design which responds to local context and which provides opportunities for innovation;
26. Safeguard the character and setting of the borough's built and natural heritage, including Ironbridge Gorge World Heritage Site and the Wrekin;
27. Protect and enhance the borough's local distinctiveness.

Environmental Resources

Aim 7: Reduce the environmental impact of new development

Objectives:

- 28. Promote solutions that reduce energy demands on non-renewable energy sources;
- 29. Safeguard the borough's limited minerals resources for future generations;
- 30. Support measures to increase household recycling rates;
- 31. Make sure development mitigates for and enables adaption to the effects of climate change;
- 32. Encourage the most efficient use of land and existing buildings to meet local needs;
- 33. Protect the borough's water supply and quality and reduce the risk of flooding.

Integrated Appraisal (IA): Sustainability Appraisal (SA) & Strategic Environmental Assessment (SEA)

- 1.6 For the IA of the Telford & Wrekin Local Plan, an integrated process has been undertaken that includes the requirements for Sustainability Appraisal (SA) as set out in national planning guidance²⁵ and to meet with the requirements of the EU SEA Directive as implemented in UK legislation through the SEA Regulations, 2004²⁶. For development planning documents in England, SA should address socio-economic factors to the same level of detail as environmental factors and as required by the SEA Regulations.
- 1.7 This IA also addresses health and equality issues²⁷ alongside the requirements of the Habitats Directive²⁸ as implemented into UK legislation through the Habitats Regulations²⁹. The findings of the health/equality and habitats assessments have been integrated into the Sustainability Appraisal. The Equality Impact (EqIA) and Habitats Regulations Assessment (HRA) are provided separately as they are subject to different legislation and guidance.
- 1.8 Integrated Appraisal is an iterative and ongoing process that informs plan-making by assessing developing elements of the plan, evaluating and describing the likely significant effects of implementing the plan, and suggesting possibilities for mitigating significant adverse effects and enhancing positive effects. UK Guidance suggests a staged approach to SEA³⁰. Initially the scope of the IA is determined by establishing the baseline conditions and context of the plan by considering other relevant plans and objectives, and by identifying issues, problems and opportunities for the area. From this the scope of the IA is prepared and includes an IA Framework of objectives for sustainable development in the plan area and which forms the basis against which the plan is assessed.
- 1.9 An integrated approach to appraisal and assessment brings resource efficiencies and allows complementary issues to be considered concurrently.

²⁵ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

²⁶ <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

²⁷ To demonstrate compliance with the Equality Act, 2010

²⁸ EU Directive 1992/43/EEC (and see also NPPF paragraphs 14 & 117)

²⁹ The Conservation of Habitats & Species Regulations, 2010 (as amended).

³⁰ ODPM A Practical Guide to the SEA Directive 2005

The Government's extant guidance recognises value in undertaking HRA and SA concurrently (although the findings and reporting of the two processes should be kept distinct)³¹. In practice, the evidence base for both processes can be shared with Habitats Regulations Assessment findings and conclusions supporting the SA/SEA.

Habitats Regulations Assessment (HRA)

- 1.10 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The aim of the HRA process is to assess the potential effects arising from a plan against the nature conservation objectives of any European site designated for its nature conservation importance.
- 1.11 The HRA screening (and any more detailed Appropriate Assessment) considers if the potential impacts arising from the Local Plan are likely to have significant effects on these sites either alone or in combination with other plans and projects. The methods and findings of the HRA process is set out in a separate HRA Report that will be sent to the statutory consultee (Natural England) and placed on consultation for the wider public. The HRA findings have informed the IA.

Health (HIA) & Equality Impact Assessment (EqIA)

- 1.12 In addition, the Council has chosen to integrate the health and equality impact assessment processes with the overarching Integrated Appraisal (IA) process. Health Impact Assessment (HIA) is not a statutory requirement for Councils; however, health considerations are a requirement of the SEA process and thus the overall IA process. Public bodies have a duty³² to assess the impact of their policies on different population groups to ensure that discrimination does not take place and where possible, to promote equality of opportunity.
- 1.13 For the appraisal of the Local Plan, the integration of health and equality concerns has focused on ensuring that these issues are well represented in the IA Framework [through objectives and decision-aiding questions] against which the emergent policies are being assessed. Consideration of health and equality issues has been addressed iteratively as the appraisal process has progressed. Details of the Equality Impact Assessment (EqIA) are also presented separately to demonstrate compliance with the Equality Act (2010) as Appendix VIII to this IA Report, and a summary of the findings can be found in Section 5 of this report.

Summary of Compliance with SEA Directive & Regulations

- 1.14 The Strategic Environmental Assessment Regulations set out certain requirements for reporting the SEA process, and specify that if an integrated

³¹ Planning for the Protection of European Sites: Appropriate Assessment: Guidance for Regional Spatial Strategies and Local Development Documents (DCLG, August 2006)

³² Equality Act, 2010

appraisal is undertaken (i.e. SEA is subsumed within the SA process, as for this integrated appraisal of the Local Plan), then the sections of the Environmental Report that meet the requirements set out for reporting the SEA process must be clearly signposted. The requirements for reporting the SEA process are set out in Appendix I of this IA Report.

Structure of this Integrated Appraisal Report

- 1.15 Section 2 of this IA Report sets out the methods used to appraise the emerging elements of the Local Plan. Section 3 describes the sustainability context for the IA, including the objectives of other relevant plans and programmes, and the baseline characteristics of the area (details in Appendices II & III). Section 4 explains how options are considered and assessed in plan-making and how alternatives are considered in IA in order to explicitly demonstrate compliance with the requirements of the SEA Regulations.
- 1.16 Section 5 summarises the overall findings of the IA of the Local Plan. The detailed integrated appraisals of potential site allocations are provided in Appendix VI. Appendix VIII details the findings of the EqIA and provides a separate document to demonstrate compliance for the Council with the requirements of the Equality Act, 2010. The HRA Report accompanies the Local Plan; the findings are summarised and have been taken into account in this IA Report.
- 1.17 The SEA Directive and Regulations requires that the Report should include a description of the measures envisaged concerning monitoring and as such proposals are set out in section 6. A summary of the findings of the IA is provided in section 7, together with the next steps for the plan and the IA. In accordance with the SEA Directive, a Non-Technical Summary is also provided - at the beginning of this IA Report and also available separately. Appendix I provides signposting to explain how this SA complies with the requirements of the SEA Directive - and as required by the Directive.

2.0 Integrated Appraisal Method

Introduction

- 2.1 Integrated Appraisal incorporating Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and to promote sustainable development for plan-making. The role of IA is to inform the Council as the planning authority; the IA findings do not form the sole basis for decision-making - this is informed also by other studies, feasibility and feedback from consultation. There is a tiering of appraisal/assessment processes (and see also later Figure 4.1) that align with the hierarchy of plans - from international, national and through to local. This tiering is acknowledged by the NPPF (2012) in paragraph 167 that states that *"Assessments should be proportionate and should not repeat policy assessment that has already been undertaken."* SEA sets the context for subsequent project level studies during Environmental Impact Assessment (EIA) for major development projects.
- 2.2 This Integrated Appraisal that has incorporated the requirements of the EU SEA Directive, the findings from the EU Habitats Directive, and the findings of the Equality Impact Assessment (EqIA). Since the Habitats Regulations Assessment (HRA) and the EqIA are driven by distinct legislation, the HRA Report and the EqIA Report are provided separately to clearly demonstrate compliance (although the findings of these assessments have informed the IA, in particular the SA/SEA).

Scoping and the IA Framework

- 2.3 During 2011 and early 2012 (and the early stages of the Local Plan preparation), relevant plans and programmes (PP) were reviewed and baseline information was gathered and analysed by the independent consultants, URS, to help identify the issues, problems and opportunities for the area (further detailed in the following section 3). The details of this analysis were reported in the Draft Scoping Report published in May 2012³³.
- 2.4 A Framework of SA Objectives and decision-aiding questions was developed from the key issues identified. The Framework aims to promote and/or protect sustainability factors that are relevant to the Local Plan area and its timescale for implementation in the period up to 2031. It forms the basis against which emerging elements of the Local Plan are appraised using both quantitative and qualitative assessment respectively from the evidence base and professional judgment. The scoping work in 2011/2012 built on the SA Framework that had previously been developed as part of SA Scoping work carried out to inform preparation of Local Development Documents in 2008. Section F2 in the Final Scoping Report³⁴ explains how the Objectives evolved as a result of consultation comments and updated evidence from 2008 to 2011.

³³ Telford & Wrekin Council (May 2012) Draft Scoping Report. Prepared by URS.

³⁴ Telford & Wrekin Council (June 2013) Final Scoping Report. Prepared by URS.

- 2.5 The Draft Scoping Report set out the process undertaken and it was published on the Council website in May 2012 and subject to consultation with the SEA statutory bodies (English Heritage (now Historic England), the Environment Agency, and Natural England, stakeholders and the public. As a result of the comments received, minor amendments and additions were made and a Final Scoping Report was published in June 2013. The consultation comments are provided here in this IA Report at Appendix X, together with a summary of how they were taken into account.
- 2.6 Further amendments were made to the SA Framework and Objectives by the Council prior to the appraisal of the Shaping Places Strategy & Options Document in 2013. The changes sought to provide further clarification and also reduced the number of objectives to avoid duplication within the appraisal. This reduced the number of Objectives from 50 to 24. The amended SA Framework was presented in Section 4 of the Strategy & Options SA Report published in June 2013 and subject to consultation with the public and statutory consultees. Minor amendments were made to the wording of SA Objective 21 following consultation on the Draft Local Plan and IA Report in July 2015. The minor changes sought to address comments received from Historic England and do not significantly alter the purpose of the objective.
- 2.7 The final IA Framework of Objectives and Decision-Aiding Questions is set out in the following Table 2.1:

Table 2.1 IA Framework

IA Objectives		Appraisal Rationale
Sustainable Economic Development		
1	To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups.	<ul style="list-style-type: none"> Extent to which policies enhance the employment opportunities of those areas experiencing deprivation and rural isolation.
2	To reduce the number of people with difficulties accessing employment, education and training opportunities.	<ul style="list-style-type: none"> Improving the ability of people to access employment, education and training opportunities.
3	To ensure an appropriate supply of employment land and starter business premises.	<ul style="list-style-type: none"> To deliver employment land attractive to inward investment and also provide for a range of business units.
4	Improve the supply and affordability of accommodation for all groups in areas of greatest need.	<ul style="list-style-type: none"> Extent to which policies address: affordability issues; size of property needed to retain/attract employees; the needs of an ageing population Provision being made for travellers & gypsies.
5	Locate housing in areas with good accessibility to employment, services and amenities.	<ul style="list-style-type: none"> Extent to which housing sites are served by sustainable transport modes.
Resource Management & Material Assets		
6	To deliver continued reduction in the quantities of waste being generated and the quantities being disposed of at landfill.	<ul style="list-style-type: none"> Extent to which policies promote sustainable construction techniques for new development proposals as demonstrated via evidence such as BREEAM and CEEQUAL. Consider policies that require sufficient land to be allocated to encourage self-

		<p>sufficiency in waste management and processing within housing and commercial development.</p> <ul style="list-style-type: none"> • Extent to which policies promote the waste hierarchy with the encouragement of re-use and recycling of materials including food wastes across municipal and commercial waste streams.
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.	<ul style="list-style-type: none"> • Extent to which policies promote sustainable construction techniques for new development proposals as demonstrated via evidence such as BREEAM and CEEQUAL. • Extent to which policies make adequate provision for the storage and recycling of aggregate and building materials.
8	To minimise demand upon water resources and to enable the timely provision of adequate waste water treatment to support increased housing provision.	<ul style="list-style-type: none"> • Extent to which policies include measures that require developers to demonstrate how they have reduced water demand. • Extent to which policies sequence development such that adequate capacity is available from waste water treatment plans to respond to additional flows.
9	To make travel more reliable and efficient, as well as enhance access to jobs, education, healthcare, shops and leisure.	<ul style="list-style-type: none"> • Consider whether policies promote sustainable travel.
10	To work with other service providers to enable the timely provision of community facilities to accord with the delivery of new houses.	<ul style="list-style-type: none"> • Extent to which plans address current and emerging need for community facilities, i.e. hospitals, schools, community centres.
Sustainable Communities		
11	To achieve a population profile in balance with the employment opportunities that the travel to work area is able to provide.	<ul style="list-style-type: none"> • Extent to which housing, employment and transport and policies assist in moderating the amount of inward and outward commuting.
12	To provide an environment that helps retain well-educated members of the work force.	<ul style="list-style-type: none"> • Whether policies contribute towards the retention of mobile professionals.
13	To improve the health and well-being of the population to meet the needs of the vulnerable and ageing population.	<ul style="list-style-type: none"> • Whether policies improve access to health facilities. Reduce health inequalities and improve well-being. • Extent to which measures encourage walking and cycling, improve access to greenspace targeting those communities experiencing health inequalities. • Whether housing policies deliver homes of a decent standard and minimise fuel poverty.
14	To create opportunities for the community to reduce levels of obesity.	<ul style="list-style-type: none"> • Whether policies encourage developers to contribute towards local recreational areas such as green gyms
15	To enable vulnerable people to live independently.	<ul style="list-style-type: none"> • Whether policies promote the development of care homes and specialist services for

		the elderly and as well as those suffering from dementia and mobility difficulties.
16	To ensure urban design and layout contributes towards reducing the potential for crime.	<ul style="list-style-type: none"> Whether policies require the designing out crime for new development.
Environmental Sustainability		
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.	<ul style="list-style-type: none"> Whether policies and site allocations protect areas of peat from direct and indirect impacts.
18	To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.	<ul style="list-style-type: none"> Whether policies enhance designated and non-designated habitats and species (e.g. through increased connectivity or reduced disturbance) Extent to which the recreational enjoyment of nature is promoted delivering health benefits to those most deprived communities while not threatening ecological interests.
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.	<ul style="list-style-type: none"> Extent to which policies deliver the design and management of open and recreational space in which people of all ages feel safe and confident to use.
20	To manage the landscape effects of development in recognition of European Landscape Convention.	<ul style="list-style-type: none"> Consider whether policies maintain and enhance the landscape quality, including historic landscape features. Extent to which landscape character and design considerations both current and future are integrated into development policies. Extent to which policies may directly or indirectly affect the special qualities of the AONB.
21	To enhance, conserve and protect the significance of cultural heritage assets and their settings.	<ul style="list-style-type: none"> Whether policies promote conservation or enhancement and access to sites of geological importance. How policies affect the historic environment.
22	To reduce annual CO2 emissions by 60% from 1990 levels, by 2050 (36% by 2026).	<ul style="list-style-type: none"> Whether policies and site allocations contribute towards reducing emissions.
23	To deliver a built environment that is well adapted to cope with the changing weather conditions that are forecast.	<ul style="list-style-type: none"> Extent to which policies promote building form and layout that aid adaptation.
24	Incorporate measures into development proposals that contribute towards a reduction in flood risk aimed at providing a runoff rate less than greenfield rates.	<ul style="list-style-type: none"> Whether policies deliver a reduction in flood risk.

IA Method

- 2.8 This Framework formed the basis for appraising the strategic options for the level and distribution of growth as well as policy options in 2013. The baseline information and PP Review were updated in 2014; the issues for the Local Plan area remained the same and the IA Framework was still relevant and retained for continuity of appraisal. The summary of the updated baseline and plans and programmes review can be found in Section 3 with the detail provided in Appendices II and III.
- 2.9 During the early stages of SA and Local Plan preparation (Strategy & Options in 2013), the SA used a system of symbols to represent the findings of the SA for different elements of the emerging plan as follows:

Table 2.2: SA Key to Nature and Significance of Effects (2013)

Score	Symbol
Major Positive Effect	Maj+ve
Moderate Positive Effect	Mod+ve
Minimal Positive Effect	Min+ve
Neutral Effect / Not Related	Neut-
Minor Negative Effect	Min-ve
Moderate Negative Effect	Mod-ve
Major Negative Effect	Maj-ve
Insufficient Information	?

Table 2.3: Compatibility Analysis Key (2013)

+	Compatible
?	Uncertain
0	Neutral
-	Incompatible

- 2.10 Amendments to the significance key were made by Enfusion Ltd in early 2015, in order to make the identified sustainability effects of the Local Plan clearer. The revised significance key used for the SA of Strategic Growth Options and Potential Site Allocations is presented in Table 2.4 below:

Table 2.4: Revised Significance Key.

Categories of Significance		
Symbol	Meaning	Sustainability Effect
--	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

- 2.11 For Compatibility Analysis of the Local Plan Vision and Objectives (amended and refined since 2013):

Table 2.5: Revised Compatibility Analysis Key.

O	Neutral
++	Very Compatible
+	Compatible
?	Uncertain
-	Incompatible
--	Very Incompatible

- 2.12 Throughout the SA process, the appraisal was proportionate to the stage of the developing Local Plan and the elements of the plan that were being appraised.

Growth Options

- 2.13 Three options for the level of growth were subject to SA against the full SA Framework by the Council in 2013 using the key presented in Table 2.2. The findings of this work was summarised in Section 7 of the Strategy & Options SA Report published in June 2013. A summary of this previous work is provided in Section 4 of this Report with the detailed appraisal matrices presented in Appendix IV.
- 2.14 Following further technical studies relating to the objectively assessed housing and employment needs of the borough in March 2015³⁵, the Council considered it necessary to reconsider reasonable options for housing growth during the life of the Local Plan. Three options for housing growth were identified in April 2015 and these were subject to an independent appraisal carried out by Enfusion against the full IA Framework of Objectives using the key presented in Table 2.4. The three strategic options were subject to a comparative appraisal with evidence cited where applicable. A commentary was provided and suggestions for mitigation or enhancement were also made where relevant. The nature of the likely sustainability effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) were described, together with any uncertainty noted. Summary findings are provided in Section 4 of this Report with the detailed appraisal matrices presented in Appendix V.

Spatial Distribution Options

- 2.15 Three options for the spatial distribution of growth were subject to SA against the full SA Framework by the Council in 2013 using the key presented in Table 2.2. The findings of this work was summarised in Section 8 of the Strategy & Options SA Report published in June 2013. A summary of this previous work is provided in Section 4 of this Report with the detailed appraisal matrices

³⁵ | Telford & Wrekin Council (March 2015) Objectively Assessed Housing Need Final Report. Prepared by PBA. Available online: http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/911/objectively_assessed_need

presented in Appendix IV. Section 4 also provides a narrative that considers how updated evidence, including changes to the overall level of growth, affects the appraisal of spatial distribution options through the IA.

Policy Options

- 2.16 Reasonable options for policies were subject to SA against the full SA Framework by the Council in 2013 using the key presented in Table 2.2. The findings of this work was summarised in Section 9 of the Strategy & Options SA Report published in June 2013. A summary of this previous work is provided in Section 4 of this Report with the detailed appraisal matrices presented in Appendix IV.

Site Options

- 2.17 Reasonable site options were subject to IA against the full SA Framework in March/April 2015 by Enfusion using the key presented in Table 2.4. Enfusion worked closely with the Council in Jan/Feb 2015 to develop standards and thresholds to determine the nature and significance of effects against the IA Framework. This would help to ensure that a consistent comparative appraisal of reasonable site options is carried out. Any assumptions/ uncertainties or standards/ thresholds used to determine the nature and significance of effects against IA Objectives for reasonable site options are presented in Table 2.6 below. Summary findings of the IA are provided in Section 4 of this Report with the detailed appraisal matrices presented in Appendix VI.
- 2.18 Following consultation on the Draft and Publication Version of the Local Plan the Council made a number of changes to the Plan. The findings of the IA for site options were updated to take account of these changes as well as the consultation responses received. Following changes to Policy ER 2, the IA Framework was revised against Objective 7 to reflect the protection of buffer zones as well as Mineral Safeguarded Areas themselves. This resulted in some changes to the appraisal of site options presented in Appendix VI. The changes made to the appraisals were only minor and do not significantly affect the overall findings for the IA. It should be noted that 3 new site options were proposed through consultation on the Publication Version of the Local Plan. These were subject to IA against the full SA Framework in April 2016 by Enfusion using the key presented in Table 2.4. Summary findings are provided in Section 4 of this Report with the detailed appraisal matrices presented in Appendix VI. The reasons for the selection or rejection of site options are provided in Appendix IX.

Table 2.6: Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA of Site Options

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
Sustainable Economic Development					
1	To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups.	<ul style="list-style-type: none">Extent to which policies enhance the employment opportunities of those areas experiencing deprivation and rural isolation.	The appraisal of site options will consider SA Objectives 1 to 3 together as they relate to the same topic, economy & employment . The nature and significance of the effects on this SA Objective will primarily relate to the capacity of the site to accommodate employment land and the potential loss of existing employment. The appraisal commentary will note if a site is within an area experiencing deprivation and/or rural isolation.	++	Site is located within a strategic employment area identified in the Proposed Housing and Employment Sites Document (May 2014).
				+	The site is identified within the Proposed Housing and Employment Sites Document (May 2014) as potentially being suitable for employment or mixed uses.
2	To reduce the number of people with difficulties accessing employment, education and training opportunities.	<ul style="list-style-type: none">Improving the ability of people to access employment, education and training opportunities.		0	If the site has not been identified as potentially being suitable for employment or mixed use within the Proposed Housing and Employment Sites Document (May 2014), as it is better suited to residential development, then it is considered to have a neutral effect against this SA Objective.
				?	Capacity of the site to accommodate employment development is unknown.
3	To ensure an appropriate supply of employment land and starter business premises.	<ul style="list-style-type: none">To deliver employment land attractive to inward investment and also provide for a range of business units.		-	Development at the site may restrict other employment development.
				--	Development at the site may prevent other employment development and lead to the loss of existing employment.
4	Improve the supply and affordability of accommodation for all groups in areas of greatest need.	<ul style="list-style-type: none">Extent to which policies address: affordability issues; size of property needed to retain/attract	The appraisal of site options will consider SA Objectives 1 to 3 together as they relate to the same topic, housing .	++	Site option has the potential to accommodate a significant level of residential development (> 500 dwellings).
				+	

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
		<p>employees; the needs of an ageing population</p> <ul style="list-style-type: none">Provision being made for travellers & gypsies.	<p>It is considered unlikely that SA Objectives 4 & 5 will be a key differentiator between site options.</p> <p>SA Objective 4 primarily relates to improving the supply and affordability of accommodation. It is assumed that development at any of the site options could meet the affordable housing requirements set out in the Local Plan.</p> <p>SA Objective 5 primarily relates to accessibility to sustainable transport modes. This is being addressed separately against SA Objective 9.</p> <p>The nature and significance of the effect will be determined by the capacity of the sites to accommodate residential development.</p>	<div></div> <div>0</div> <div></div> <div>?</div> <div></div> <div>-</div> <div></div> <div>--</div> <div></div>	<p>Site option has the potential to accommodate residential development (< 500 dwellings).</p> <p>If no housing is being proposed as part of development, as it is an employment site, then it is considered to have a neutral effect against this SA Objective.</p> <p>Capacity of the site to accommodate residential development is unknown.</p> <p>Not applicable.</p> <p>Not applicable.</p>
5	Locate housing in areas with good accessibility to employment, services and amenities.	Extent to which housing sites are served by sustainable transport modes.	This issues is being addressed against SA Objective 9.	N/A	Not applicable.
Resource Management & Material Assets					
6	To deliver continued reduction in the quantities of waste being generated and the quantities	<ul style="list-style-type: none">Extent to which polices promote sustainable construction techniques for new development proposals as	It is assumed that development at any of the site options could promote the waste hierarchy by ensuring sustainable construction and self-sufficiency in waste management.	N/A	Not applicable.

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
	being disposed of at landfill.	<p>demonstrated via evidence such as BREEAM and CEEQUAL.</p> <ul style="list-style-type: none"> Consider policies that require sufficient land to be allocated to encourage self-sufficiency in waste management and processing within housing and commercial development. Extent to which policies promote the waste hierarchy with the encouragement of re-use and recycling of materials including food wastes across municipal and commercial waste streams. 	It is therefore determined that this SA Objective will not help to differentiate between potential sites and should be scoped out from the appraisal of site options.		
7	To reduce the quantities of primary aggregate required for building and infrastructure projects by	<ul style="list-style-type: none"> Extent to which policies promote sustainable construction techniques for new development proposals as 	It is assumed that development at any of the site options could promote sustainable construction techniques and make adequate provision for the storage and recycling of building materials.	++	A major positive effect is not considered possible.
				+	A minor positive effect is not considered possible.

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
	maximising the use of secondary aggregates as well as to protect mineral resources from sterilisation.	<p>demonstrated via evidence such as BREEAM and CEEQUAL.</p> <ul style="list-style-type: none"> Extent to which policies make adequate provision for the storage and recycling of aggregate and building materials. 	<p>It is therefore considered that the nature and significance of the effects on this SA Objective will primarily relate the sterilisation of mineral resources.</p> <p>The Council has identified that the built up urban areas of Telford and Newport (as identified in the Local Plan) are excluded from mineral safeguarding.</p>	<p>0</p> <p>?</p> <p>-</p> <p>--</p>	<p>The site is not within or adjacent to a potential safeguarded area for minerals or it is located within the urban area.</p> <p>An element of uncertainty exists until more detailed lower level surveys and assessment have been carried out through planning applications.</p> <p>The site is partially within or within a buffer zone of a potential safeguarded area for minerals.</p> <p>The site is entirely within a potential area safeguarded for minerals.</p>
8	To minimise demand upon water resources and to enable the timely provision of adequate waste water treatment to support increased housing provision.	<ul style="list-style-type: none"> Extent to which policies include measures that require developers to demonstrate how they have reduced water demand. Extent to which policies sequence development such that adequate capacity is available from waste water treatment plans to respond to additional flows. 	<p>It is assumed that development at any of the site options could incorporate water conservation measures.</p> <p>The Water Cycle Study (Nov 2014) identifies wastewater treatment capacity as the main environmental and infrastructure constraint to growth in the Plan area.</p> <p>The nature and significance of the effect against this SA Objective for site options will therefore be based on the level of constraint for the receiving wastewater treatment works (WwTW).</p> <p>While it could be assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including waste water treatment, given</p>	<p>++</p> <p>+</p> <p>0</p> <p>?</p> <p>-</p>	<p>A major positive effect is not considered possible.</p> <p>A minor positive effect is not considered possible.</p> <p>Site is within the catchment for the Monkmoor WwTW, which is identified within the Water Cycle Study (Nov 2014) as having low constraint.</p> <p>There are uncertainties with regard to wastewater treatment capacity.</p> <p>Site is within the catchment area for either the Rushmoor, Edgmond, High Ercall or Sambrook WwTWs, which have been identified within the Water Cycle Study (Nov 2014) as either being moderate or moderate to highly constrained.</p>

IA Framework			IA of Site Options		
IA Objective	Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA			
			the findings of the Water Cycle Study (2014) it is considered appropriate that this issue is considered within the SA Framework. This will also help to inform the concurrent HRA process for the Local Plan.	--	Site is within the catchment area for either the Newport, Coalport, Waters Upton or Crudgington WwTWs, which have been identified within the Water Cycle Study (Nov 2014) as being very highly constrained.
9	To make travel more reliable and efficient, as well as enhance access to jobs, education, healthcare, shops and leisure.	<ul style="list-style-type: none"> Consider whether policies promote sustainable travel. 	<p>The nature and significance of the effect against this SA Objective will focus on accessibility to existing sustainable transport modes.</p> <p>It is assumed that development at any of the site options could potentially provide or contribute to improved sustainable modes of transport.</p> <p>Where necessary the appraisal will note the realities of the situation with regard to existing access to public transport, i.e. A site option may be within 800m of a railway station but there are no suitable footpaths or cycle ways to access it. The topography of the site option or area may also be a barrier to movement.</p> <p>Distances are measured using ArcGIS Software placing a buffer around bus routes with a ½ hour service and train stations.</p>	++	Site is within reasonable walking distance to a bus route (within 400m) with a service every ½ hr and train station (within 1km), there are no barriers to movement.
				+	The site is within reasonable walking distance assess to either a bus route (within 400m) with a service every ½ hr or a train station (within 1km), there are no barriers to movement.
				0	A neutral effect is not considered possible.
				?	An uncertain effect is not considered possible.
				-	The site is within reasonable walking distance assess to either a bus route (within 400m) with a service every ½ hr or a train station (within 1km) and there are barriers to movement.
				--	The site is not within reasonable walking distance to either a bus route (within 400m) with a service every ½ hr or a train station (within 1km) and there are barriers to movement.

IA Framework		IA of Site Options			
IA Objective	Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA			
10	To work with other service providers to enable the timely provision of community facilities to accord with the delivery of new houses.	<ul style="list-style-type: none"> Extent to which plans address current and emerging need for community facilities, i.e. hospitals, schools, community centres. 	<p>It is assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health, green infrastructure and other community facilities and services.</p> <p>This SA Objective will addresses two separate issues, accessibility to existing centres and education.</p> <p>Where necessary the appraisal will note the realities of the situation with regard to access to existing facilities/services, i.e. A site option may be within 800m of services/facilities but there are no suitable footpaths or cycle ways to access it. The topography of the site option or area may also be a barrier to movement.</p>	++	Site is within reasonable walking distance (within 800m) to Telford, Newport or Wellington Town Centre.
				+	Site is within reasonable walking distance (within 800m) to either Dawley, Donnington, Hadley, Ironbridge, Lawley, Madley and Oakengates Town Centres or a Local Service Centre.
				0	A neutral effect is not considered possible.
				?	An uncertain effect is not considered possible.
				-	Site is not within reasonable walking distance (within 800m) to Telford, Newport or Wellington Town Centre and/or there are barriers to movement (i.e. steep topography or lack of suitable footpath).
				--	Site is not within reasonable walking distance (within 800m) to either Dawley, Donnington, Hadley, Ironbridge, Lawley, Madley and Oakengates Town Centres or a Local Service Centre and there are barriers to movement (i.e. steep topography or lack of suitable footpath).
				++	Site is within walking distance to both a primary (400m) and secondary school (1.6km).
				+	Site is within walking distance to a primary (400m) or secondary school (1.6km).
				0	

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
			<p>This SA Objective will addresses two separate issues, accessibility to existing centres and education.</p> <p>Where necessary the appraisal will note the realities of the situation with regard to access to existing education facilities, i.e. A site option may be within 400m of primary school but there are no suitable footpaths or cycle ways to access it. The topography of the site option or area may also be a barrier to movement.</p> <p>It should be noted that a small number of the proposed housing allocations contain educational facilities, which, if lost in development could affect the accessibility findings of other sites assessed in this SA</p>		A neutral effect is not considered possible.
				?	An uncertain effect is not considered possible.
				-	Site is within walking distance to a primary (400m) or secondary school (1.6km) but there are barriers to movement (i.e. steep topography or lack of suitable footpath).
				--	Site is not within reasonable walking distance to either a primary (400m) or secondary school (1.6km) and there are barriers to movement (i.e. steep topography or lack of suitable footpath).
Sustainable Communities					
11	To achieve a population profile in balance with the employment opportunities that the travel to work area is able to provide.	<ul style="list-style-type: none">Extent to which housing, employment and transport and polices assist in moderating the amount of inward and outward commuting.	Commuting (inward and outward) is linked to a number of other topics, which include SA Objectives relating to the provision of housing and employment as well as transport. This issue is already addressed through a number of other SA Objectives; therefore, it is considered that it will not help to differentiate between potential sites and should therefore be scoped out from the appraisal of site options.	N/A	Not applicable.
12	To provide an environment that helps retain well-educated	<ul style="list-style-type: none">Whether polices contribute towards the retention of mobile professionals.	This SA Objective will not help to differentiate between potential sites and should therefore be scoped out from the appraisal of site options.	N/A	Not applicable.

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
	members of the work force.				
13	To improve the health and well-being of the population to meet the needs of the vulnerable and ageing population.	<ul style="list-style-type: none"> Whether policies improve access to health facilities. Reduce health inequalities and improve well-being. Extent to which measures encourage walking and cycling, improve access to greenspace targeting those communities experiencing health inequalities. Whether housing policies deliver homes of a decent standard and minimise fuel poverty. 	<p>This SA Objective will addresses two separate issues relating to health, the first being conflicting neighbouring land uses and the second accessibility to existing core network of pedestrian routes (walking/cycling).</p> <p>It is assumed that development at any of the site options has the potential for short-term minor negative effects arising during the construction phase, and that suitable mitigation exists to ensure that these do not result in long-term negative effects on health and well-being.</p> <p>It is assumed that there is the potential for development at all the site options to have indirect long-term positive effects on health through the provision of housing or employment by helping to meet the needs of the Plan area.</p>	++	Development at the site could address an existing significant amenity issue for a sensitive neighbouring land use and/or there is the potential to provide a significant health service or facility.
				+	Development at the site could address an existing amenity issue for neighbouring land uses.
				0	Development at the site is not likely to be affected by any conflicting neighbouring land uses, or could affect the amenity of a sensitive neighbouring land use. Potential for a residual neutral effect is there is suitable mitigation available to address minor negative effects.
				?	An element of uncertainty exists until more detailed site level assessments have been undertaken.
				-	Development at the site could potentially be affected by neighbouring land uses and/or could affect the amenity of a sensitive neighbouring land use.
				--	Development at the site could potentially be significantly affected by neighbouring land uses and/or could significantly affect the amenity a sensitive neighbouring land use.
				++	The site is within 200m of a strategic footpath and 1km of a strategic cycling route.
				+	

IA Framework			IA of Site Options		
IA Objective	Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA			
			pedestrian routes (strategic footpaths and cycle routes).		The site is within 200m of a strategic footpath or 1km of a strategic cycling route.
			It is assumed that any proposal for development can make appropriate and timely provision for necessary supporting infrastructure, including health facilities and services as well as improvements to walking and cycling routes.	0	A neutral effect is not considered possible.
				?	There is some uncertainty with regard to accessibility to existing walking/cycling routes.
			Distances are measured using ArcGIS Software placing a buffer around strategic footpaths and cycle routes.	-	The site is not within 200m of a strategic footpath or 1km of a strategic cycling route and there are barriers to movement.
				--	The site is not within 200m of a strategic footpath and 1km of a strategic cycling route.
14	To create opportunities for the community to reduce levels of obesity.	<ul style="list-style-type: none"> Whether policies encourage developers to contribute towards local recreational areas such as green gyms 	<p>The nature and significance of the effect against this SA Objective will primarily relate to accessibility to existing local recreational areas (playing fields and parks and open spaces).</p> <p>It should be noted that a small number of the proposed housing allocations contain recreational areas, which, if lost in development could affect the accessibility findings of other sites assessed in this SA</p>	++	The site is adjacent to an existing local recreational area.
				+	The site is within reasonable walking distance (800m) to an existing local recreational area.
				0	A neutral effect is not considered possible
				?	There are some uncertainties in relation to accessibility to existing local recreational areas.
				-	The site is not within reasonable walking distance (800m) to an existing local recreational area.
				--	Development at the site would result in the loss of an existing recreational area,

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
					and the site is beyond reasonable walking distance (800m) to alternative provisions of recreational space.
15	To enable vulnerable people to live independently.	<ul style="list-style-type: none">Whether policies promote the development of care homes and specialist services for the elderly and as well as those suffering from dementia and mobility difficulties.	Accessibility to existing facilities and services is already addressed against SA Objective 10. This SA Objective will not help to differentiate between potential sites and should therefore be scoped out from the appraisal of site options.	N/A	Not applicable.
16	To ensure urban design and layout contributes towards reducing the potential for crime.	<ul style="list-style-type: none">Whether policies require the designing out crime for new development.	It is assumed that the design and layout of development at any of the potential sites could incorporate Secured by Design Standards. It is therefore considered that this SA Objective will not help to differentiate between potential sites and should be scoped out from the appraisal of site options.	N/A	Not applicable.
Environmental Sustainability					
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.	<ul style="list-style-type: none">Whether policies and site allocations protect areas of peat from direct and indirect impacts.	The nature and significance of effects against this SA Objective will primarily relate to whether a site is within the Weald Moors .	++	A significant positive effect is not considered possible against this SA Objective.
				+	A minor positive effect is not considered possible against this SA Objective.
				0	Site is not situated within the Weald Moors.
				?	

IA Framework			IA of Site Options	
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA	
				An uncertain effect is not considered possible.
			-	Site is less than 5ha and situated within the Weald Moors.
			--	Site is greater than 5ha and situated within the Weald Moors.
18	To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.	<ul style="list-style-type: none">Whether polices enhance designated and non-designated habitats and species (e.g. through increased connectivity or reduced disturbance)Extent to which the recreational enjoyment of nature is promoted delivering health benefits to those most deprived communities while not threatening ecological interests.	<p>The nature and significance of effects against this SA Objective will primarily relate to potential effects on designated biodiversity.</p> <p>Is the site within, adjacent to, or in close proximity (200m) to any nationally designated biodiversity (SSSIs, NNRs)? It should be noted that there are no European sites within the District and that they are already subject to a high degree of protection.</p> <p>Is there evidence of European Protected Species or Habitats on the site?</p> <p>Is the site within, adjacent to, or in close proximity (200m) to any biodiversity sites designated as being of local importance (Local Wildlife Site, Local Nature Reserve)?</p> <p>It is recognised that when considering the potential for effects on designated biodiversity, distance in itself is not a definitive guide to the likelihood or severity</p>	<p>++ Development will; deliver biodiversity gains, or improve green corridors / connections to strategic GI, or development will address a significant existing sustainability issue relating to biodiversity.</p> <p>+ Development will not lead to the loss of an important habitat, species, trees and hedgerows or lead to fragmentation of green corridors and there are potential opportunities to enhance biodiversity.</p> <p>0 Development at the site is not likely to have negative effects on any nationally or locally designated biodiversity or contribute towards a severance of green and blue infrastructure or impede the migration of biodiversity. Potential for a residual neutral effect. or Development at the site has the potential for negative effects on sites designated as being of local importance. Mitigation possible, potential for a residual neutral effect. Development at the site does not contribute to the severance of green or</p>

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
			of an impact. The appraisal commentary will try to note any key environmental pathways that could result in development potentially having a negative effect on designated biodiversity that may be some distance away.		blue infrastructure or impede the migration of biodiversity.
			Are there opportunities to enhance biodiversity? Possibly improve connectivity, green/blue infrastructure or enhance an important habitat?	?	Element of uncertainty exists until more detailed lower level surveys and assessments have been carried out.
				-	Development at the site has the potential for negative effects on sites designated as being of local importance. Mitigation difficult and / or expensive, potential for a minor residual negative effect.
					or Development at the site has the potential for negative effects on a nationally (SSSI, NNR) designated sites and / or European protected species or habitats. Mitigation possible, potential for a minor residual negative effect.
				--	Development at the site has the potential for negative effects on a nationally (SSSI, NNR) designated sites and / or European protected species or habitats. Mitigation difficult and / or expensive, potential for a major residual negative effect.
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	<ul style="list-style-type: none">Extent to which policies deliver the design and management of open and recreational space in which people of all ages feel safe and confident to use.	It is considered that the nature and significance of the effect against this SA Objective should primarily relate to the loss of green infrastructure . Loss can relate to both a loss of quality and/or extent. It could be assumed that development at any site might provide green infrastructure. It will therefore be important for the appraisal to note any sites that could	++	Development at the site option will not lead to the loss of green infrastructure and has the potential to significantly improve access to it.
			+	Development at the site option will not result in the loss of green infrastructure and has the potential to significantly improve access to it.	
			0	A neutral effect is not considered possible.	

IA Framework		IA of Site Options			
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
	wellbeing of the local population.		potentially provide a significant contribution in terms of the quantity and quality of green infrastructure.	?	There is some uncertainty with regard to the land type.
			The appraisal will be informed by the updated evidence in relation to the Green Network.	-	Development at the site has the potential to lead to the loss of green infrastructure outside of the Green Network.
				--	Development at the site has the potential to result in the loss of any green infrastructure within the Green Network.
20	To manage the landscape effects of development in recognition of European Landscape Convention.	<ul style="list-style-type: none"> Consider whether policies maintain and enhance the landscape quality, including historic landscape features. Extent to which landscape character and design considerations both current and future are integrated into development policies. Extent to which policies may directly or indirectly affect the special qualities of the AONB. 	<p>The nature and significance of the effects against this SA Objective will primarily relate to the landscape sensitivity of the site option.</p> <p>If the landscape sensitivity is not known then it is assumed that development on a greenfield site has the potential for a minor negative effect as there would be development in a previously undeveloped area.</p> <p>If the landscape sensitivity is not known then it is assumed that development on a brownfield site has the potential for a minor positive effect as it would result in the regeneration of the site.</p> <p>It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out through planning applications.</p>	<p>++</p> <p>+</p> <p>0</p> <p>?</p> <p>-</p>	<p>Development significantly enhances the landscape or removes a significant eyesore and/or would regenerate previously developed land and buildings (PDL) that is currently having a major negative effect on the landscape/ townscape.</p> <p>Development would remove an eyesore, or enhance the landscape and/or would regenerate PDL that is currently having a minor negative effect on the landscape/ townscape.</p> <p>A neutral effect is not considered possible.</p> <p>Element of uncertainty exists until more detailed lower level assessments have been carried out.</p> <p>The site option has medium sensitivity in landscape terms, and / or is with the</p>

IA Framework			IA of Site Options		
IA Objective	Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA			
			It is assumed that any Tree Preservation Orders within a site option will be retained.		AONB setting. Mitigation available, potential for a minor residual negative effect.
				--	The site option has medium to high or high sensitivity in landscape terms and / or is within the AONB or its setting. Mitigation is likely to be difficult/ expensive. Potential for major residual negative effect.
21	To enhance, conserve and protect the significance of cultural heritage assets and their settings.	<ul style="list-style-type: none"> Whether policies promote conservation or enhancement and access to sites of geological importance. How policies affect the historic environment. 	<p>The nature and significance of the effects against this SA Objective will primarily relate to designated heritage assets and their setting. Any important non-designated heritage assets will be noted within the appraisal commentary.</p> <p>Are there any designated heritage assets or their setting, which could be affected within or adjacent to the site?</p> <p>Are there any opportunities to enhance culture or heritage assets, such as; securing appropriate new uses for unused Listed Buildings; the removal of an eyesore could have a positive effect on the setting of designated assets; improved access and signage?</p> <p>Need to consider the nature and significance of the effects identified against SA Objective 20 (Landscape), in terms of the setting of designated heritage assets.</p>	++	Development is likely to have a substantial positive effect on the significance of the heritage asset / historic environment.
				+	Development has the potential for minor positive effects as it may secure appropriate new uses for unused Listed Buildings; enhance the setting of or access / signage to designated assets.
				0	Development will have no significant effect. This may be because there are no heritage assets within the influence of proposed development or that mitigation measures are considered sufficient to address potential negative effects with the potential for a residual neutral effect.
				?	Element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.
				-	Development has the potential for a minor negative effect on a Conservation Area, Scheduled Monument, Listed Building, Registered Historic Parks and Gardens, Ironbridge World Heritage Site and/or their setting. Even once

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
			It is considered that there is an element of uncertainty for all sites until more detailed lower level surveys and assessments have been carried out.		avoidance and mitigation measures have been considered there is still the potential for a residual minor negative effect.
				--	Development has the potential for a major residual negative effect on a Conservation Area, Scheduled Monument, Listed Building, Registered Historic Parks and Gardens, Ironbridge World Heritage Site and/or their setting. Or development has the potential for a negative effect on the Mitigation difficult and / or expensive.
22	To reduce annual CO2 emissions by 60% from 1990 levels, by 2050 (36% by 2026).	<ul style="list-style-type: none">Whether policies and site allocations contribute towards reducing emissions.	Development at the site options are most likely to increase the level of CO ₂ emissions in the borough through an increase in vehicular traffic. It is therefore considered that the nature and significance of the effect against this SA Objective should relate to the potential traffic impacts of development at the site options. This will be informed by traffic modelling carried out by the Council.	++	Development at the site has the potential to significantly reduce levels of traffic in an area that is experiencing congestion issues.
				+	Development at the site has the potential to reduce levels of traffic.
				0	Development at the site (capacity for less than 10 dwellings) will result in a minor increase in traffic, mitigation will achieve a residual neutral effect
				?	An element of uncertainty exists for all sites until more detailed lower level surveys and assessments have been carried out.
				-	Development at the site (capacity for between 10 - 500 dwellings) has the potential to increase levels of traffic in an area already experiencing capacity issues.
				--	

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
					Development at the site (capacity for over 500 dwellings) has the potential to significantly increase levels of traffic in an area already experiencing capacity issues.
23	To deliver a built environment that is well adapted to cope with the changing weather conditions that are forecast.	<ul style="list-style-type: none">Extent to which policies promote building form and layout that aid adaptation.	It is assumed that development at any of the site options could promote building form and layout that aids adaptation. It is therefore considered that this SA Objective will not help to differentiate between potential sites and should be scoped out from the appraisal of site options.	N/A	Not applicable.
24	Incorporate measures into development proposals that contribute towards a reduction in flood risk aimed at providing a runoff rate less than greenfield rates.	<ul style="list-style-type: none">Whether policies deliver a reduction in flood risk.	The Council's site appraisal process has removed any sites that fall completely within Flood Zone 3a or 3b or 50% or more of the site falls within Flood Zone 3a or 3b. It is assumed that development at any of the site options has the potential to incorporate Sustainable Drainage in some form. The nature and significance of effects against this SA Objective will primarily relate to if a site option is within an area of flood risk or has the potential to reduce flood risk.	++	The site option is not located within an area of flood risk and there is evidence that development could offer an opportunity to potentially significantly reduce flood risk.
				+	The site option is not located within an area of flood risk and there is evidence that development could offer an opportunity reduce flood risk.
				0	The site is not within a flood risk zone, and is unlikely to adversely affect flood risk in the wider catchment, or The site is partially within an areas of high flood risk but development can avoid this area/suitable mitigation is available resulting in a residual neutral effect.
				?	There is an element of uncertainty until more detailed lower level surveys and assessments have been carried out.

IA Framework			IA of Site Options		
IA Objective		Appraisal Rationale	Significance criteria, including any assumptions, uncertainties, standards and thresholds for IA		
25			The SA Framework does not include any Objectives relating to the efficient use of land or agricultural land quality. It is therefore proposed that some additional criteria are included for the consideration of these issues through the SA of site options. The nature and significance of the effect will relate to the land type at the site and the loss of best and most versatile agricultural land . The appraisal commentary will, where possible, note if a site only contains a small proportion of best and most versatile agricultural land and development could therefore avoid it.	-	The site is partially within an area of high flood risk, or at risk of surface water flooding in parts of the site.
				--	The site is wholly within an area of high flood risk or at risk of surface water flooding across the entire site.
				++	The site is entirely brownfield and will not result in the loss of any agricultural land.
				+	The site includes some brownfield land and will not result in the loss of best and most versatile agricultural land.
				0	A neutral effect is not considered possible.
				?	An element of uncertainty exists for all sites until more detailed lower level surveys and assessment have been carried out through planning applications.
				-	The entire site is greenfield and does not contain any best and most versatile agricultural land.
				--	The entire site is greenfield and contains best and most versatile land.

IA of the Draft Local Plan (Regulation 18)

- 2.19 The SA of the Draft Local Plan, including policies, was structured under 12 topic headings, which were linked to Objectives in the IA Framework as well as topics in the SEA Directive and relevant paragraphs from the NPPF. This provided a framework and structure to evaluate the likely significant effects of the Draft Local Plan against these key topics. The appraisal of each topic was divided into a number of sub-headings to ensure that each aspect of the emerging Local Plan (Policies and Site Allocations) was considered as well as the interrelationships between topics and cumulative effects of the Plan as a whole.
- 2.20 The appraisal was undertaken using professional judgment, supported by the updated baseline information and further updated evidence for the Local Plan, as well as any other relevant information sources available. The nature of the likely sustainability effects (including positive/negative, duration, permanent/ temporary, secondary, cumulative and synergistic) were described, together with any uncertainty noted. Evidence was cited where applicable and a commentary provided and suggestions for mitigation or enhancement made where relevant. Integrated Appraisal is informed by the best available information and data; however, data gaps and uncertainties exist and it is not always possible to accurately predict effects at a strategic level of assessment.

IA of the Local Plan Publication Version (Regulation 19)

- 2.21 A number of changes have been made to the Local Plan since the Regulation 18 consultation ended in September 2015. It is important to ensure that any proposed changes are screened through the IA process to determine if they significantly affect the findings of the IA presented in the IA Report (July 2015) and further appraisal work is required. A screening table was produced to consider all the amendments, which includes proposed changes to Policy as well as preferred site allocations. The findings of this work is provided in Appendix XI of this Report.
- 2.22 The screening found that the changes are minor. They do not significantly affect the findings of the previous IA work as they seek to provide further clarification or avoid repetition. This includes the deletion of some policies and merging of others. While no significant further appraisal work was deemed necessary, it was considered appropriate to update the findings of the IA for the Draft Local Plan in Section 5 to reflect the proposed amendments, including changes to policy numbers, as well as consultation responses received.

IA of the Local Plan Submission Version (Regulation 22)

- 2.23 A number of changes have been made to the Local Plan since the Regulation 19 consultation ended in March 2016. It is important to ensure that any proposed changes are screened through the IA process to determine if they significantly affect the findings of the IA presented in the Publication IA

Report (December 2015) and further appraisal work is required. A screening table was produced to consider all the amendments, which includes proposed changes to Policy as well as preferred site allocations. The findings of this work is provided in Appendix XI of this Report.

- 2.24 The screening found that all the changes are minor and do not significantly affect the findings of the previous IA work as they seek to provide further clarification or avoid repetition.

Uncertainties and data gaps

- 2.25 It is not always possible to accurately predict sustainability effects when considering plans at such a strategic scale. Impacts on biodiversity and cultural heritage, for example, will depend on more detailed information and studies at a site-level. Whilst climate change science is becoming more accurate, it is difficult to predict impacts likely to result from climate change, including synergistic effects. These uncertainties have been acknowledged in the appraisal, baseline and other areas of this IA Report where applicable.

Consultation on the IA

- 2.26 The SEA Directive/ Regulations require that the public shall be given an early and effective opportunity within appropriate timeframes to express their opinion on the plan and accompanying environmental report before the adoption of the plan.
- 2.27 The IA has been subject to public consultation at the scoping stage in 2012 and with the SA Report (June 2013) that accompanied the Strategy & Options Document on consultation in 2013. The responses to consultation on the SA were presented in Appendix X of the Draft Integrated Appraisal Report (July 2015).
- 2.28 The Draft Local Plan and Integrated Appraisal Report (July 2015) underwent consultation from 03 August 2015 to 25 September 2015. This IA Report accompanying the Local Plan Publication Version on public consultation from 01 February to 15 March 2016 was amended to reflect both changes in the Local Plan and comments received during consultation. The Integrated Appraisal studies and findings have informed and continue to inform the development of the Plan and comprise part of the evidence base for the emerging Plan. This IA Report will accompany the Local Plan on submission to the Secretary of State.

3.0 Sustainability Context, Objectives & Baseline Characteristics

Introduction

- 3.1 The IA scoping process was undertaken and presented in the Final Scoping Report (June 2013). Comments received from Statutory Bodies are included in Appendix X, and all comments received have informed the progressive development of the Integrated Appraisal and Local Plan. The details of the review of relevant plans and programmes, the baseline information, and the characterisation and sustainability characteristics of the Telford and Wrekin Plan area are contained in the IA Scoping Report, which can be viewed on the Council's website³⁶.
- 3.2 This Section provides a summary of the baseline information and plans and programme review as well as the key issues, problems, objectives and opportunities for sustainable development and spatial planning that were identified as a result of such studies.

Review of Relevant Plans and Programmes (PPs)

- 3.3 In order to establish a clear scope for the IA of the Plan it is necessary (and a requirement of the SEA Directive) to review and develop an understanding of the wider range of "*policies, plans, programmes and sustainability objectives*"³⁷ that are relevant to the Plan. This includes International, European, National, Regional and local level policies, plans and strategies. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives promotes systematic identification of the ways in which the Local Plan could be influenced by - and help to fulfil them. Details of the relevant PPs are provided in this IA Report in Appendix III and the key relevant plans and programmes are summarised in the paragraphs following:

The National Planning Policy Framework (2012)

- 3.4 The National Planning Policy Framework (NPPF) is the overarching policy framework for the delivery of sustainable development across England, and is underpinned by a presumption in favour of sustainable development. The purpose of the planning system is to contribute to the achievement of sustainable development. The National Planning Policy Framework³⁸ (paragraph 7) states that:

"There are three dimensions to sustainable development - economic, social and environmental - which give rise to the need for the planning system to perform a number of roles".

³⁶

http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/555/sustainability_appraisal_and_habitat_regulation_assessment

³⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans>

³⁸ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

- 3.5 These roles include meeting the needs (employment, housing and infrastructure) of the borough as well as protecting and enhancing the environment. The NPPF (paragraph 8) states that:

"These roles should not be undertaken in isolation because they are mutually dependent".

- 3.6 The Local Plan should draw upon the NPPF policy framework, and reflect the national priorities for new development. The NPPF sets out 12 core land-use planning principles that should underpin both plan-making and decision-taking.

National Infrastructure Plan (2014)

- 3.7 The National Infrastructure Plan sets out the Government's vision for major infrastructure investment, the priorities for which include the Strategic Road Network, flood protection measures, a Network Rail delivery programme, support for digital infrastructure and science infrastructure.
- 3.8 The Local Plan will need to consider the implications of these investment priorities and the opportunities associated with these changes.

The Natural Choice: Securing the Value of Nature (2011)

- 3.9 This strategy promotes partnerships of local authorities, local communities and landowners, the private sector and conservation organisations which will establish new Nature Improvement Areas (NIAs) based on a local assessment of opportunities for restoring and connecting nature.
- 3.10 The Local Plan should therefore consider a strategy for biodiversity offsetting to support the creation and maintenance of coherent and resilient ecological networks.

The Carbon Plan by DECC (2011)

- 3.11 The Plan expresses Government wishes to support and enable communities in their wish to adopt higher environmental standards for new homes. This includes through ensuring that there are robust sustainability standards for local authorities to use if they want to set higher standards than those in the national regulations in their Local Plans.
- 3.12 The Local Plan should consider including sustainability standards to support the development of low carbon homes.

Active Travel Strategy (2010)

- 3.13 The strategy plans to put walking and cycling at the centre of local transport and public health strategies over the next decade which has recognised values of tackling congestion, reducing carbon emissions and improving local environments.

- 3.14 The Local Plan should ensure that policies maximise the health benefits that walking and cycling can bring through a variety of measures, including travel plans and utilising the Health Economic Assessment Tool for walking and cycling investments. Local authorities should develop a robust local monitoring and evaluation framework.

National Flood and Coastal Erosion Risk Management (FCERM) Strategy for England (2011)

- 3.15 This strategy sets out a statutory framework that will help communities, the public sector and other organisations to work together to manage flood and coastal erosion risk. The strategy covers flooding from the sea, rivers, surface water, sewers, groundwater and reservoirs.
- 3.16 The Local Plan should ensure that policies are in compliance with the framework and contribute to reducing food risk across the Plan area.

Telford and Wrekin Local Transport Plan (2011-2026)

- 3.17 The Local Transport Plan seeks to make travel more reliable and efficient, whilst reducing carbon emissions and allowing everyone to access jobs, education, healthcare, shops and leisure. The Plan also seeks to reduce the impacts of transport development including safety, visual, noise, and air quality impacts.
- 3.18 The Local Plan should support the Local Transport Plan by ensuring new development supports the objectives of increased reliability, efficiency and accessibility, especially through development management policies to reduce the impacts of transport development, appropriate siting of new development to support increased accessibility and through infrastructure contributions from new development.

Severn Tidal Tributaries Catchment Flood Management Plan (CFMP) (2009)

- 3.19 The CFMP seeks to reduce flood risk to provide an acceptable level of public safety, this includes reducing the risk to critical infrastructure, communication and transport links, reducing the economic impacts of flooding, reducing the risk of diffuse pollution, and reducing the impacts of flooding on valued heritage assets. The plan further seeks to maintain and enhance valued landscapes and priority habitats and species within the flood plain.
- 3.20 The Local Plan should provide measures to reduce the risk of flooding, and mitigation to reduce the consequences of flooding.

Telford and Wrekin Community Strategy (2013)

- 3.21 The Community Strategy's main objective is to protect and create jobs and narrow the gap between the most and least deprived communities. The strategy aims to ensure that Telford and Wrekin is an attractive place to live in, work in and visit, as well as provide sufficient space to encourage positive and active lifestyles.

- 3.22 The Local Plan vision is aligned with the aspirations of this strategy, along with numerous objectives that support the aims outlined above. The Plan seeks to reduce inequalities and improve quality of life within the borough for all residents and visitors.

Telford and Wrekin Health and Wellbeing Strategy (2013)

- 3.23 The vision of the Health and Wellbeing Strategy is to improve the health and wellbeing of our communities and address health inequalities. There are a number of health priorities for the borough including; reducing excess weight in adults and children, reducing teenage pregnancy, improving life expectancy, supporting people to live independently and supporting residents' mental health.
- 3.24 The Local Plan can support the attainment of these goals when shaping the future development of the borough, including by increasing accessibility to promote more active lifestyles, reducing health inequalities and deprivation across the borough, delivering high quality housing that meets the diverse local needs, and through high quality provisions, including infrastructure, green space and biodiversity, which is known to support mental as well as physical wellbeing.

Ironbridge Gorge World Heritage Site (WHS) Management Plan (2001)

- 3.25 The Ironbridge Gorge WHS Management Plan seeks to conserve and improve the Ironbridge Gorge area. This includes increasing public awareness of the WHS, promoting the educational and cultural value of the historic landscape, working with the local community to develop the local economy and culture, and establishing a programme of action which seeks further sources of funding.
- 3.26 The Local Plan should also seek to conserve and improve the WHS, in particular its valued landscapes and local economy. The Plan can support the WHS by directing development away from the most sensitive receiving environments, and identifying opportunities where development would be appropriate and beneficial to the local area; which may include contributions to support the ongoing management of the valued site.

Madeley Neighbourhood Plan (2014)

- 3.27 The Plan details the priorities for the Madeley area at the neighbourhood scale, which includes improving housing and accessibility, enhancing green spaces and local heritage, supporting the Town centre and local economy, and providing new employment opportunities. The Plan sets out a policy framework to address these issues.
- 3.28 The Local Plan should consider and support the local aspirations when developing the policy framework and site allocation options.

Waters Upton Neighbourhood Plan (2014)

- 3.29 The Plan details the priorities for the Waters Upton area at the neighbourhood scale, which includes improving housing and accessibility, enhancing green spaces, local character and heritage, and encouraging local employment. The Plan sets out a policy framework to address these issues.
- 3.30 The Local Plan should consider and support the local aspirations when developing the policy framework and site allocation options.

Local Flood Risk Management Strategy (2014)

- 3.31 The Strategy aims to provide a robust local framework that employs a range of complementary approaches towards managing and communicating the risk and consequences of flooding arising from surface water runoff, groundwater and ordinary watercourses in the borough.
- 3.32 The Local Plan should provide measures to reduce the risk of flooding, and mitigation to reduce the consequences of flooding.

Shropshire Biodiversity Action Plan (SBAP) (2009)

- 3.33 There are 13 habitats for which a Habitat Action Plan (HAP) is currently included in the SBAP, as well as 30 species for which a Species Action Plan (SAP) is included.
- 3.34 The Local Plan policies should seek to protect and enhance the habitats and species within the SBAP.

The Marches LEP Strategic Economic Plan (2014)

- 3.35 The vision for the Marches is of a strong, diverse and enterprising business base, operating in an exceptional and connected environment, where the transfer of technology and skills foster innovation, investment and economic growth. Strategic priorities are identified, including supporting business through access to finance and incentives to innovate, providing high quality physical infrastructure, investing in skills, driving the transition to a high value, low carbon economy, and removing barriers to participation to reduce social exclusion.
- 3.36 The Local Plan should support not only economic growth but also economic diversity. The Plan should also coordinate infrastructure investments to maximise potential benefits to the local economy, whilst at the same time driving down carbon emissions.

Baseline Conditions & Likely Evolution without the Plan

- 3.37 The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the plan area and to provide the basis for predicting and

monitoring effects of the plan. In order to make judgments about how the Plan will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in the Plan area today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the area to allow the potential effects of the draft Plan to be adequately predicted.

- 3.38 The SA/ SEA Guidance provided by Government³⁹ proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the IA process guides plan making and as new information becomes available.
- 3.39 A summary of the collated baseline information is provided below with a description of the current situation. The detailed baseline information is presented in Appendix II of this IA Report; this also sets out the evolution of the baseline without the Plan for each of the topics.

Water: Resources, Quality and Flooding

- 3.40 The principal source of surface water within the borough is the River Severn. Further stretches of rivers within the borough include the rivers Tern, Roden, Meese and Strine, which all form part of the Shropshire Middle Severn Catchment. The principal groundwater source is the North Shropshire aquifer. There are other aquifers that underlie Telford and Wrekin which are also subject to numerous public and private abstractions.
- 3.41 The borough primarily falls within the Shelton Water Resource Zone (WRZ) and Whitchurch and Wren WRZ. The Severn Trent Water Resource Management Plan⁴⁰ (WRMP) identifies that the supply in the Shelton WRZ is due to suddenly decline in 2024/25 in response to licence 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.
- 3.42 A Detailed Water Cycle Study (WCS) was carried out in 2014 to establish constraints to development within the borough from existing environmental and water infrastructure capacity. The WCS identifies that the majority of development is likely to be situated within the Shelton WRZ. The study further identified that the following Waste Water Treatment Works (WwTW) are very highly constrained:
- Newport
 - Coalport
 - Waters Upton
 - Crudgington

³⁹ Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

⁴⁰ Severn Trent Water (2014) Final Water Resource Management Plan.

- 3.43 Based on the current (2012) WFD status all the receiving waterbodies to the WwTWs serving the study area are predicted to be unable to achieve 'good status' by 2015, and the new target by which to reach this is now 2027. Although there has been a general improvement in watercourses in the past few decades, nitrate and phosphate levels in water have remained high. Almost all of Telford and Wrekin is a Nitrate Vulnerable Zone with a need to protect and enhance resources.
- 3.44 Changes to the volume and / or quality of water in the River Severn and its tributaries as a result of development may affect the Severn Estuary SAC and SPA downstream (outside of the borough boundary). The Shropshire Middle Severn Catchment area is also identified as vulnerable to increases in abstraction for public supply and irrigation, particularly during low flow conditions.
- 3.45 The West Midlands Regional Flood Risk Assessment (RFRA)⁴¹ provides a flood risk indicator for the Authority, which concludes that the risks are medium but that the consequences are high. The Environment Agency's River Severn Catchment Flood Management Plan⁴² (CFMP) identifies the Telford area as being within Policy 5: requiring further action to reduce flood risk. The RFRA concludes that developments must be aware of the CFMP and not develop on areas affected by the long term North Shropshire Tributaries Policy of increasing flood risk in areas which are currently used for agriculture. Surface water and drainage system problems (septic tanks and runoff from playing fields) are also identified as an issue for the borough. The RFRA recommends that development takes place within Flood Zone 1 where possible and that Sequential and Exception Testing is undertaken for all new sites.
- 3.46 Without a Local Plan in place development may not be appropriately phased, which may increase pressures on the water supplies, especially in those areas identified as highly constrained. The Local Plan can seek where appropriate the delivery of water efficiency measures in new development, which may not be otherwise considered. The Local Plan can also ensure that mitigation is employed to reduce flood risk, and ensure that flood risk is not displaced as a result of development.

Biodiversity: Fauna and Flora

- 3.47 There are no Ramsar, SPA or SAC sites within the Plan area, however there are five internationally designated sites within 20km of the boundary. There are 8 Sites of Special Scientific Interest (SSSIs), they cover 372.33 ha and 71% meets the PSA (public service agreement) target as assessed when last surveyed in October 2010⁴³. There are currently five Local Nature Reserves (LNRs) in the borough covering a total area of 189.21 ha. Further to this there exists 1298.32

⁴¹ Halcrow, 2009: The West Midlands Regional Flood Risk Assessment

⁴² EA (2009) River Severn Catchment Flood Management Plan [online]

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289103/River_Severn_Catchment_Management_Plan.pdf [accessed July 2015]

⁴³ Telford & Wrekin, 2010: 3rd LTP Strategic Environmental Assessment Health Impact Assessment and Habitat Regulations Assessment Environmental Report.

ha of Wildlife Sites and 11.22 ha of biodiversity importance recognised since April 2008⁴⁴. There are also 26 Local Geological Sites in Telford and Wrekin⁴⁵.

- 3.48 29 of a total of 66 wildlife and geological sites (44%) are in positive management. Many sites exist as small pockets within urban areas, so the habitat is fragmented. It is also noted that several Local Geological Sites are associated with the Wenlock AONB and as such will receive indirect protection through that mechanism.
- 3.49 Telford and Wrekin is characterised by its green and open spaces in both its urban and rural areas. 38% of the land area of Telford consists of open space⁴⁶. The distribution of green infrastructure in the Plan area is provided in Table 3.1 below.

Table 3.1: Telford and Wrekin Green Infrastructure Typology

Type of Green Infrastructure	Area in ha	Percentage of Authority
Agricultural Land	18088.5	62.29%
Not Green Infrastructure	2850.6	9.82%
Woodlands	2502.3	8.62%
Private Domestic Gardens	2057.5	7.09%
Grassland, Heathland, Moorland, Scrubland	1237.4	4.26%
Incidental Green Space	784.5	2.70%
Institutional Grounds	515.7	1.78%
Outdoor Sports Facilities	498.3	1.72%
Water Bodies	184.9	0.64%
Parks, Public Gardens & Recreation Grounds	122.9	0.42%
Water Courses	118.6	0.41%
Cemeteries, Churchyards & Burial Grounds	35.7	0.12%
Wetlands	28.6	0.10%
Allotments & community Gardens	11	0.04%
Orchards	1.6	0.01%
Total	29038.1	100.00%

- 3.50 Without a Local Plan in place, development may not mitigate the potential effects on sites of nature conservation interest, development may therefore result in increased disturbance, noise and light pollution negatively effecting biodiversity. The Local Plan can also deliver funds to support the maintenance, creation and enhancement of nature conservation areas as a result of development contributions. Development may also increase the fragmentation of habitats, a Local Plan can deliver green corridors to ensure biodiversity connectivity.

⁴⁴ Telford & Wrekin, 2010: Local Development Framework Annual Monitoring Report

⁴⁵ Telford & Wrekin, 2010: 3rd LTP Strategic Environmental Assessment Health Impact Assessment and Habitat Regulations Assessment Environmental Report.

⁴⁶ Telford & Wrekin 2007: Core Strategy Development Plan document adopted December 2007

Cultural Heritage

- 3.51 Telford and Wrekin has a range of historic assets, including; Ironbridge Gorge World Heritage Site, 29 Scheduled Monuments, 3 Historic Parks and Gardens, 7 Conservation Areas and approximately 800 Listed Buildings. There are also over 500 Buildings of Local Interest⁴⁷.
- 3.52 While there are no navigable waterways in the borough, a network of disused canals exist, which for the most part have been lost to development. The remaining lengths are protected for recreational use, and the Newport branch of the Shropshire Union Canal has been listed nationally as worthy of long term restoration for leisure use. There is also a proposal to restore navigation to the River Severn although for environmental reasons the scheme is contentious.
- 3.53 The Buildings at Risk Register⁴⁸ records five buildings and 8 Scheduled Monuments as being 'at risk' in Telford and Wrekin.
- 3.54 Ironbridge Gorge attracts approximately 750,000 visitors a year generating over half of tourist spend within the borough. The boundary of the WHS coincides with the Severn Gorge Conservation Area boundary. The Conservation Area Management Plan identifies four main issues for the areas of; preservation of the special character of the WHS, access and visitor management, land instability, and management of the rivers and banks.
- 3.55 Without a Local Plan in place, development may alter the character of various areas across the borough, and affect the setting of the WHS. Without appropriate policy in place, development could result in the loss of local distinctiveness.

Landscape and Visual Amenity

- 3.56 An area of the Shropshire Hills AONB extends into Telford and Wrekin to include the Wrekin. The AONB is recognised for its key qualities of; diversity and contrast of its landscape, hills, farmland, woods, rivers, important geology, wildlife, heritage, scenic quality and views, tranquillity and culture⁴⁹.
- 3.57 Telford is located in National Character Area 66: Mid Severn Sandstone Plateau⁵⁰ described in Table 3.2 below:

Table 3.2: Landscape Character Description from National Character Area 66

- | |
|--|
| <p>■ North of the Ironbridge gorge is a landscape of gentle valleys and escarpments forming the east Shropshire (Coalbrookdale) Coalfield, dominated by the new town of Telford.</p> |
|--|

⁴⁷ Telford and Wrekin Council (2016) Historic Environment Technical Paper [online] http://www.telford.gov.uk/downloads/file/3906/technical_paper_-_historic_environment_january_2016

⁴⁸ Historic England [online] Heritage at Risk Register

⁴⁹ Shropshire Hill AONB (2015) [online] www.shropshirehillsaonb.co.uk

⁵⁰ Natural England (2013) NCA Profile: 66 Mid Severn Sandstone Plateau (NE472) [online] <http://publications.naturalengland.org.uk/publication/5001578805198848> [accessed April 2015]

- Open land, including former agricultural landscapes, forms a mosaic with built-up areas, industry, houses and reclaimed land. There is a developing woodland framework.
- Three settlement patterns are overlaid. The underlying pattern of small villages and hamlets has been largely lost under sprawling 19th century settlement, abandoned open-cast reclaimed land and other industrial sites.
- The new town and motorway in turn lay down a strong 20th century pattern. The strongest impression is of industrial history whether as areas of derelict land, pit heaps, subsidence pools, canals or railways. However, at the edges, arable is still present on the flatter land of this northern area and, on the steeper ground, mixed or predominantly pasture land, is present within small hedged fields.

- 3.58 Identified landscape types include; Estate Farmland, Lowland Moors, Principal Settled Farmlands, Enclosed Lowland Heaths, Sandstone Estate Lands, Coalfields, Wooded Estate Lands, Wooded River Gorge, Wooded Hills and Estate Lands, and High Volcanic Hills and Slopes.
- 3.59 With almost 40% green open space, the urban landscape of Telford is significantly influenced and characterised by the existence of greenery and vegetation as well as the considerable areas of low density suburban development⁵¹. The town itself was created in 1968 through amalgamating a collection of places, and the north and south of the town are split by the M54 crossing the borough east-west. Contrasts where old and new are side by side can be frequently found throughout the town.
- 3.60 Without a Local Plan in place, development will not be directed across the borough and therefore may change the character of local areas, and contribute to sprawling that detracts from older heritage landscapes, and remaining farmland / arable land. Unrestricted development within the urban landscape may also result in the loss of a valued character traits, including the strong presence of green open space.

Energy and Climate Change

- 3.61 Over the period 2005 to 2009 there has been a reduction in the amount of domestic energy and gas consumed across Telford and Wrekin, however a Local Economic Assessment⁵² has identified that the physical electricity supply cable network is insufficient to enable some companies to run all their machine at the same time and research showed examples of businesses only operating certain machines in the morning or afternoon and having created their own generation facilities to 'top up' that available from the Grid.
- 3.62 The areas of Telford and Wrekin most strongly associated with fuel poverty are the wards of; Donnington, Wrockwardine Wood, Trench, St Georges, Ketley, Oakengates, Malinslee, Dawley Magna and Madeley⁵³.

⁵¹ Telford & Wrekin Council, 2003: Technical Report, Urban Landscape Character

⁵² Telford & Wrekin, 2011: Local Economic Assessment Supporting Information

⁵³ Telford & Wrekin, 2008: Affordable Warmth Strategy 2008.

- 3.63 Currently the total micro-generation installed in Telford and Wrekin is 0.081MWe (86% photovoltaic and 14% wind)⁵⁴. This compares with 0.496 MWe for Stafford, 0.881 MWe for Shropshire and 1.59 MWe for Sedgemoor. The coal-fired power station at Ironbridge is due to be decommissioned in 2016⁵⁵.
- 3.64 Climate projections indicate that warmer, wetter winters, and hotter, drier summers can be expected. They also indicate that the frequency of severe weather events will increase⁵⁶
- 3.65 Without a Local Plan in place, uncoordinated development could increase pressures on the electricity grid which is already highly constrained in some areas, without providing the necessary mitigation or compensation for effects, whereas the Local Plan can support development with the necessary infrastructure, especially through obtaining developer contributions. The Local Plan can also promote the enhancement of existing and creation of new renewable energy sources. Development planned through the Local Plan is also more likely to consider the potential long-term effects of development on climate change, and of climate change on people and the built and natural environment.

Air Quality

- 3.66 The main sources of air pollution are emissions from busy roads (particularly along the Ironbridge Gorge) and also from emissions from the power station at Ironbridge⁵⁷. Around 30% of carbon emissions are associated with transport, and around 33% with energy use. Total emissions for Telford and Wrekin are around 1,263,000 tonnes CO₂ / year or 7.8 tonnes per resident, which is slightly less than the UK average of 7.9 tonnes per person per year⁵⁸.
- 3.67 Detailed air quality assessments in April 2004 following continuous monitoring along the Wharfage in Ironbridge confirmed that the Air Quality Strategy (AQS) Objectives for NO₂ and SO₂ were being met. The Updating and Screening Assessment Review of 2008 also revealed no measured exceedances of the AQS Objectives as did the 2011 Air Quality Progress Report.
- 3.68 Without a Local Plan in place, uncoordinated development could increase traffic and energy use without providing sufficient mitigation or compensation, it could also increase emissions in vulnerable areas which could result in exceedances of the AQS Objectives. Development will be less likely to be linked to other initiatives like increased accessibility, which is closely linked to emissions and overall air quality.

⁵⁴ <http://www.aeat.com/microgenerationindex/>

⁵⁵ Shropshire 2011: Core Strategy

⁵⁶ UKCIP, 2009: <http://ukclimateprojections.defra.gov.uk/content/view/1501/499/>

⁵⁷ Telford & Wrekin Authority Council, 2009: LAQM Updating and Screening Assessment 2009

⁵⁸ Telford & Wrekin Council, 2008: Climate for Change:
http://www.telford.gov.uk/downloads/Climate_for_Change_Jul08.pdf

Infrastructure, Transport and Accessibility

- 3.69 Telford and Wrekin has high quality road infrastructure and connections and the M54 traverses the centre of the District (east-west). Bus routes create connections within the borough, and there are 3 train stations at Telford Central, Wellington and Oakengates. The railway has regular services connecting Telford and Wrekin with Shrewsbury, Wolverhampton and Birmingham New Street. The low density of development across Telford and Wrekin however makes the provision of public transport services difficult. Combined with previous policies promoting the segregation of land uses in Telford, travel other than by car is less attractive and prohibits access to jobs and services.
- 3.70 The 2011 travel to work patterns⁵⁹ shows that:
- 44.9% employees travel singly by car;
 - 5.1 % by car as passenger;
 - 5.1% travel by foot;
 - 1.4% by bicycle;
 - 2.6% by bus;
 - 0.9% by train;
 - 0.5% by motorcycle;
 - 0.7% by taxi; and
 - 2.6% work from home.
- 3.71 Telford and Wrekin, in particular in the rural areas, is poorly served by broadband networks. The Council has announced its intention to explore a private sector partnership aimed at enabling remote parts to access broadband while delivering major savings for the authority. This was taken forward through the Broadband Improvement Pilot (BIP) scheme in the Kinnersley Moor area, during 2010. The £120,000 project aimed to assess the potential for wireless broadband technology to bridge the current gap in broadband provision in more remote areas. The key outcome is that a local IT company will look to create a bespoke network for the local residents in the Kinnersley and Preston Moor areas that otherwise would not be provided by established network providers.
- 3.72 Without a Local Plan in place, uncoordinated development is less likely to consider the accessibility of sites, and less likely to promote the required modal shift. The Local Plan can also ensure development contributions for the enhancement of transport and infrastructure networks in line with growth expectations. The Local Plan can also support the development of local initiatives, like the BIP, to address local issues that may not otherwise be addressed.

⁵⁹ Neighbourhood Statistics (2011) Telford and Wrekin Local Authority [online] <http://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=6275277&c=telford&d=13&e=61&q=6386646&i=1001x1003x1032x1004&m=0&r=1&s=1424162193507&enc=1&dsFamilyId=2567> [accessed February 2015]

Land, Minerals and Waste

- 3.73 There is currently no sand and gravel working in Telford and Wrekin, although a single site produces crushed rock. The Shropshire Core Strategy⁶⁰ advises that sufficient crushed rock aggregate resources exist from permitted sites, but that additional sand and gravel resources may be required up to 2026 to provide for flexibility and local competition.
- 3.74 As shallow coal measures are recorded in the Central Telford area, including in Old Park and Malinslee Character Areas, development proposals should consider land stability and surface hazards resulting from past mining operations.
- 3.75 About 1 million tonnes of controlled wastes are generated each year in Telford and Wrekin. Municipal waste represents around 10% of this (90,000 tonnes), the remaining 90% is generated through development (construction and demolition waste) and through production of goods and services (industrial, commercial and hazardous wastes).
- 3.76 During 2005 and 2010 there was a reduction in the amount of waste generated by each household and an increase in the amount of waste recycled⁶¹. Most waste destined for landfill is managed locally, though some, and most hazardous waste, is managed within the West Midlands Region⁶². The Granville landfill site can accommodate waste until 2020, and the Candles landfill site has limited remaining capacity. 2009/10 figures for Telford and Wrekin show that around 41% of household waste was recycled and 59% was sent to landfill. While the Council is slightly ahead of the national average, nearby Staffordshire Moorlands performed the best in the country with nearly 62% of household waste sent for reuse, recycling or composting.
- 3.77 Without a Local Plan in place uncoordinated development may be less likely to consider the long-term effects on mineral resources and land quality, and the issue of instability. The Local Plan can also enforce sustainable waste management particularly for construction and demolition waste.

Housing

- 3.78 5,554 new homes were completed between 2006 and 2015, of which roughly 33% were affordable homes. In 2009/10 80.5% of residential completions were within 30 minutes' drive time of a centre, and 31.5% within 800m of a centre.
- 3.79 In general, Telford has lower property values and higher proportions of social and privately rented housing. By contrast the rural area has higher property values and more owner occupation. Newport falls between the two. There are over 17,000 people on the housing register and a significant shortfall in social and affordable housing exists despite a good supply of land.

⁶⁰ Shropshire Council, 2011: Adopted Core Strategy

⁶¹ Defra, 2011: Local Authority Collected Waste for England – Annual Statistics as Source Data for the Graphs. <http://www.defra.gov.uk/statistics/environment/waste/wrfg23-wrmsannual/>

⁶² Telford & Wrekin, 2005: From Waste to Resource, Municipal Waste Strategy 2005-2021.

- 3.80 In 2008 the Housing Condition Survey identified that around 15,100 dwellings failed to meet the Decent Homes Standard, 13,000 of which were in the private sector. The 2010 Housing Strategy⁶³ estimated around 5% of households were in fuel poverty, 22% of households had one or more residents living with a disability, and 2.3% of dwellings were overcrowded.
- 3.81 Without a Local Plan, development may seek to maximise private gains, and may be less likely to consider the requirement for affordable housing. The Local Plan can ensure high quality standards in all new development, as well as a range of housing types to meet local needs e.g. housing for the disabled.

Healthy Communities and Equality

- 3.82 In 2009 the Telford and Wrekin population of 162,300 people comprised; 33,400 people under the age of 15; 105,200 people in the working age population; and 23,700 people over the age of 65. Current estimates suggest that the population has now risen to 168,000 people⁶⁴. The age profile reveals a lower percentage of people over 65 years (14.6%) than the national average (16.3%)⁶⁵, despite this the proportion of the population over 65 years old increased by 22% between 2000 and 2009.
- 3.83 The population of Telford and Wrekin exhibited a net outward migration in 2009. Until then population growth has been driven primarily by in-migration, principally to Telford. As a result, Telford and Wrekin contains the third highest proportion of migrants in the West Midlands (13.3% in 2001).
- 3.84 Compared with the national figure of 15.4% of the working age population with no or limited qualifications, Telford and Wrekin has a figure of 12.4%. The unemployment rate in 2011 stood at 4.2%, lower than the regional figure of 4.7% but higher than the national rate of 3.7%⁶⁶. Telford and Wrekin has a higher than national and regional average rate of young people not in employment, education or training. One in five residents live in deprived communities and one in four of those under 16 years old live in low income households⁶⁷.
- 3.85 Key deprivation characteristics of Telford & Wrekin include:
- Telford & Wrekin is in the top 30% most deprived districts in the West Midlands and in the top 40% most deprived nationally.
 - Levels of deprivation across Telford & Wrekin vary considerably with some areas being in the 10% most deprived nationally and other areas of Telford & Wrekin ranked in the 10% least deprived nationally.
 - 13% of Telford & Wrekin population (20,600) now live in the 10% most deprived areas nationally in 2010 compared to 5% in 2007 (8,600).

⁶³ Telford & Wrekin, 2010: People and Places, Housing Strategy 2010-2013

⁶⁴ Public Health England (2014) Telford and Wrekin Health Profile 2014 [online] <http://www.apho.org.uk/resource/item.aspx?RID=142221> [accessed February 2015]

⁶⁵ Office for National Statistics, 2011: Painting Pictures of Place Series: Local Profiles – Demography

⁶⁶ Nomis, 2011: Out of Work Benefits July

⁶⁷ Office of National Statistics, 2011: Local Profiles

- Some 38,600 people within Telford & Wrekin are living in the 20% most deprived areas in England, around a quarter (24%) of the area's total population⁶⁸.
- 3.86 The more deprived areas of Telford and Wrekin are located around the urban areas and new town estates, with the rural parts tending towards the less deprived end of the scale. Areas within Woodside, Malinslee, Cuckoo Oak, Brookside, Hadley & Leegomery, Dawley Magna, College and Donnington fall within the 10% most deprived areas nationally.
- 3.87 There is a wide variation across Telford & Wrekin between the more affluent and deprived areas. Around 48% of the population are classed as being on a low income in the more deprived areas with 1% in the more affluent areas. The areas with the highest levels of deprivation also have the highest numbers of people reporting poor health.
- 3.88 The health of the population is generally poorer than the average for England, performing statistically worse across 18 of the 32 indicators. Although below the average for England, life expectancy in Telford and Wrekin is increasing. Life expectancy for men is significantly lower in the more deprived areas than in the more affluent areas. This is the same for women but to a lesser degree⁶⁹. The prevalence of obesity amongst adults is estimated at around 3,600 adults over the age of 16 (roughly 26.5%), higher than the national average of 24.2%⁷⁰.
- 3.89 Within Telford and Wrekin there is the Princess Royal Hospital offering a full range of acute care services, and around 20 GP practices and an additional 5 branch surgeries offering local medical services⁷¹.
- 3.90 Cultural diversity within the population includes African; Bangladeshi; Caribbean; Chinese; Indian; Japanese and Pakistani communities. The majority of these communities are located within Telford.
- 3.91 The Shropshire, Telford and Wrekin, Herefordshire and Powys Gypsy and Traveller Accommodation Assessment (2008) identified a shortfall of provision in Telford and Wrekin and proposed local targets of 34 residential pitches, a transit site and 5 traveling show peoples' plots to 2017.
- 3.92 Without a Local Plan, uncoordinated development could increase inequalities across the Plan area. For example, development may be less likely to provide a range of housing to meet local needs like elderly accommodation for an ageing population and Gypsy and Traveller sites catering for a minority group. Development may also be less likely to coordinate location, site design and layout with other objectives, particularly in this case objectives to increase access to services, facilities, employment

⁶⁸ Telford & Wrekin, 2011: Indices of Deprivation 2010

⁶⁹ Telford and Wrekin Council and Telford and Wrekin CCG (2013) Telford and Wrekin Health and Wellbeing Strategy 2013/14 to 2015/16 [online]
http://www.telford.gov.uk/downloads/file/1498/health_and_wellbeing_strategy [accessed April 2015]

⁷⁰ Ibid.

⁷¹ Telford & Wrekin, 2011: Core Strategy Development Plan Document Adopted December 2007.

opportunities, open spaces and recreational areas to promote more healthy and active lifestyles.

Economy, Employment and Education

- 3.93 There are roughly 4,500 businesses in Telford and Wrekin in 5,650 business units, providing around 81,000 jobs. The focus of economic activity is within Telford which holds roughly 86% of the total population. Of the 79,200 economically active residents; 63.5% are employees, 24.9% are in part-time employment and 6% are self-employed⁷².
- 3.94 The businesses are spread across a range of industrial and commercial sectors. The service sector is the largest employer in Telford and Wrekin, accounting for 78.1% of all jobs, however manufacturing is part of the area's heritage and remains strong today; polymer and advanced engineering companies now stand alongside traditional manufacturers.
- 3.95 In 2010, Telford and Wrekin had the smallest number of VAT/PAYE employers in the West Midlands. While the area had a greater number of businesses employing over 5 employees, and businesses employing over 100 people than the England and West Midlands averages, most of the employers were small and medium sized business with most being in the 0-4 employment size band. Small and medium sized businesses had the greatest number of closures in 2009 within the West Midlands, however Telford and Wrekin had the greatest proportion of business start-ups across the region employing 5-9 people⁷³. Over the period 1996 to 2008, the area has seen an increase in its Gross Value Added (GVA) of 3.7%, this however remains below the West Midlands (4%) and England (5.7%) percentage increases.
- 3.96 The majority of jobs available in Telford and Wrekin are located in Telford, most of which are in the large industrial estates of Hadley, Halesfield, Hortonwood and Stafford Park, as well as the MOD at Donnington. Telford Town Centre is also the main centre for commercial and professional jobs. Reflecting Telford's New Town origins there is a high level of segregation of uses in the town. Non car access to these mainly peripheral areas is limited.
- 3.97 Of the commercial and industrial floor space in Telford and Wrekin in 2008, 32.2% was retail, 28.7% factories, 20.5% offices and 14.2% warehouses. The proportion of floor space assigned to factories and other bulk uses was higher than the West Midlands average⁷⁴.
- 3.98 Telford and Wrekin is comparatively well-served for facilities offering further and Higher Education with a respected College of Further Education, and two Higher Education establishments. The Wolverhampton University (Telford Campus) at Priorslee is home to the Polymer Cluster Centre, part of the Wolverhampton Telford Technology Corridor (WTTC). The conditions of schools and other operational buildings across the Plan area was assessed in 2007/8

⁷² Inspira Consulting, 2011: Local Economic Assessment, Supporting Information, Final Draft

⁷³ Office for National Statistics, 2011: Painting Pictures of Place Series: Local Profiles – Enterprise

⁷⁴ Ibid.

and the 2010 Corporate Asset Management Plan⁷⁵ identifies a backlog of £25 million for schools and £11 million for operational properties.

- 3.99 Without a Local Plan in place, uncoordinated development could increase pressures on local educational facilities which are in some cases highly constrained, without the appropriate development contributions to supporting infrastructure. Uncoordinated development may also exacerbate the segregation of uses in Telford which is already apparent.

Key Sustainability Issues, Problems and Opportunities

- 3.100 Key sustainability problems, issues and objectives of relevance to the borough have been identified through:
- the review of other relevant Plans and Programmes;
 - an analysis of currently available baseline information ;
 - preliminary consultations with key stakeholders; and
 - consultation responses received after public consultation on the Draft SA Scoping Report (May 2012), Draft SA Report (June 2013) and Draft IA Report (July 2015).
- 3.101 Despite updates to the baseline information and PP Review in 2015 the key sustainability issues and opportunities identified in the Final Scoping Report (June 2013) were still found to be relevant and therefore no significant changes were made to the SA Framework. The key sustainable issues and opportunities for the key topics are set out below.

Sustainable Economic Development

Table 3.3: Key Sustainability Issues and Opportunities

Challenges & Opportunities	
Authority-wide	
Challenges	Opportunities
Employment <ul style="list-style-type: none"> To encourage provision of jobs to prevent Telford becoming a dormitory for the West Midlands conurbation. Help businesses with a low carbon economy, online trading and changes in demographic patterns. Improve training opportunities. Employment Land <ul style="list-style-type: none"> Maintain a balance upgrading older sites and new urban and 	Employment <ul style="list-style-type: none"> Enhance the gateway to Telford from the railway station. Improve pedestrian mobility. Employment Land <ul style="list-style-type: none"> Promote innovative development schemes potentially with low carbon demonstrations. Refurbishment of low quality employment sites. Housing <ul style="list-style-type: none"> None identified Retail <ul style="list-style-type: none"> None identified.

⁷⁵ Telford and Wrekin Council (2010) Corporate Property Asset Management Plan 2010/2013 [online] <http://apps.telford.gov.uk/CouncilAndDemocracy/Meetings/Download/MTIyMjM%3D> [accessed July 2015]

<p>rural sites while keeping Telford & Wrekin's character.</p> <p>Housing</p> <ul style="list-style-type: none"> • Provide affordable houses in a variety of sizes and tenures to meet changing needs. • Deliver housing needs for an ageing population. • Delivery pitches for the traveller community. <p>Retail</p> <ul style="list-style-type: none"> • None identified. 	
Telford	
Challenges	Opportunities
<p>Employment</p> <ul style="list-style-type: none"> • Provide for regeneration projects and establish Southwater Square for leisure employment. • Develop a High Technology Corridor. • Encourage close location of housing and jobs and improve bus services to employment sites. <p>Employment Land</p> <ul style="list-style-type: none"> • Develop an accessible thriving economy with a low environmental footprint that provides a distinctive sense of place. <p>Housing</p> <ul style="list-style-type: none"> • Renew estates and cater for the housing needs of an ageing population. • Diversify the housing types. • Provide 10 residential pitches for travellers. <p>Retail</p> <ul style="list-style-type: none"> • To achieve a vibrant central urban environment with a high quality public realm. 	<p>Employment</p> <ul style="list-style-type: none"> • Enhance the gateway to Telford from the railway station. • Improve pedestrian mobility⁷⁶. <p>Employment Land</p> <ul style="list-style-type: none"> • Improve existing public spaces with East Southwater promoted for leisure and recreation uses. <p>Housing</p> <ul style="list-style-type: none"> • Provide variety of housing types. • Enhance the links between Malinslee, Telford Town Centre, Telford Town Park and the Old Park Character Area. <p>Retail</p> <ul style="list-style-type: none"> • Establish improved connections with surrounding areas.

Resource Management & Material Assets

Challenges & Opportunities	
Authority-wide	
Challenges	Opportunities
<p>Waste</p> <ul style="list-style-type: none"> • Increase domestic waste recycling to 50% in the next 9 years. • Waste storage in housing with little provision. <p>Mineral Resources</p>	<p>Waste</p> <ul style="list-style-type: none"> • Provision of adequate space for waste management at new commercial premises. • Encourage sustainable construction techniques to reduce quantities of construction and demolition wastes.

⁷⁶ Telford & Wrekin, 2010: The Evening and Night-Time Economy Topic Paper

<ul style="list-style-type: none"> • None identified. <p>Energy</p> <ul style="list-style-type: none"> • Encourage decentralised energy networks in existing development. • Site heat suppliers and users close together. <p>Water Supply & Waste Water Treatment</p> <ul style="list-style-type: none"> • To avoid constraints on development. • To avoid constraints on the sewerage network capacity • Protect the water environment, including ground water <p>Transport Infrastructure</p> <ul style="list-style-type: none"> • Keep vehicles moving during extreme weather. • Improve transport in areas of deprivation. • Maintain use of buses. • Address fear of crime. <p>Broadband Communications</p> <ul style="list-style-type: none"> • None identified. <p>Health Care, Schools, Sports, Leisure & Community Centres</p> <ul style="list-style-type: none"> • Maintain and enhance community services. • Reversing increasing distances of driving to school. • High level of ageing leisure facilities with inefficient operational costs. • Improvements to increase participation and improve health and well-being of local community needed. 	<p>Mineral Resources</p> <ul style="list-style-type: none"> • Maximise use of recycled aggregates. <p>Energy</p> <ul style="list-style-type: none"> • Deliver the potential renewable energy technologies. • Regenerate older employment sites with “green energy” theme. <p>Water Supply & Waste Water Treatment</p> <ul style="list-style-type: none"> • Adopt policies promoting water conservation. • Introduce SuDS into new development and remove surface water from combined sewers <p>Transport Infrastructure</p> <ul style="list-style-type: none"> • Improve transport and access for all. • Improve road safety. • Promote use of electric vehicles. <p>Broadband Communications</p> <ul style="list-style-type: none"> • Promote superfast broadband networks. <p>Health Care, Schools, Sports, Leisure & Community Centres</p> <ul style="list-style-type: none"> • A network of inclusive high quality community and specialist sport and leisure facilities. • Engage with local community to identify needs and programme activities.
Telford Challenges	Opportunities
<p>Waste</p> <ul style="list-style-type: none"> • As authority-wide. <p>Mineral Resources</p> <ul style="list-style-type: none"> • As authority-wide. <p>Energy</p> <ul style="list-style-type: none"> • As authority-wide. <p>Water Supply & Waste Water Treatment</p> <ul style="list-style-type: none"> • As authority-wide. <p>Transport Infrastructure</p> <ul style="list-style-type: none"> • As authority-wide. <p>Broadband Communications</p> <ul style="list-style-type: none"> • None identified. 	<p>Waste</p> <ul style="list-style-type: none"> • As authority-wide. <p>Mineral Resources</p> <ul style="list-style-type: none"> • As authority-wide. <p>Energy</p> <ul style="list-style-type: none"> • As authority-wide. <p>Water Supply & Waste Water Treatment</p> <ul style="list-style-type: none"> • As authority-wide. <p>Transport Infrastructure</p> <ul style="list-style-type: none"> • As authority-wide. <p>Broadband Communications</p> <ul style="list-style-type: none"> • As authority-wide. <p>Health Care, Schools, Sports, Leisure & Community Centres</p>

Health Care, Schools, Sports, Leisure & Community Centres <ul style="list-style-type: none"> None identified. 	<ul style="list-style-type: none"> Manage effects of secondary school provision by neighbouring authorities.
Newport	
Challenges	Opportunities
Waste <ul style="list-style-type: none"> As authority-wide. Mineral Resources <ul style="list-style-type: none"> None identified. Energy <ul style="list-style-type: none"> As authority-wide. Water Supply & Waste Water Treatment <ul style="list-style-type: none"> As authority-wide. Transport Infrastructure <ul style="list-style-type: none"> None identified. Broadband Communications <ul style="list-style-type: none"> None identified. Health Care, Schools, Sports, Leisure & Community Centres <ul style="list-style-type: none"> Link new housing and secondary school provision. 	Waste <ul style="list-style-type: none"> As authority-wide. Mineral Resources <ul style="list-style-type: none"> None identified. Energy <ul style="list-style-type: none"> As authority-wide. Water Supply & Waste Water Treatment <ul style="list-style-type: none"> As above. Transport Infrastructure <ul style="list-style-type: none"> None identified. Broadband Communications <ul style="list-style-type: none"> As authority-wide. Health Care, Schools, Sports, Leisure & Community Centres <ul style="list-style-type: none"> None identified.
Rural Areas	
Challenges	Opportunities
Waste <ul style="list-style-type: none"> As authority-wide. Mineral Resources <ul style="list-style-type: none"> None identified. Energy <ul style="list-style-type: none"> None identified. Water Supply & Waste Water Treatment <ul style="list-style-type: none"> As authority-wide. Transport Infrastructure <ul style="list-style-type: none"> Meet the needs of rural communities. Broadband Communications <ul style="list-style-type: none"> None identified. Health Care, Schools, Sports, Leisure & Community Centres <ul style="list-style-type: none"> Accessibility and transport links prohibit sustained use of sport and leisure facilities. 	Waste <ul style="list-style-type: none"> As authority-wide. Mineral Resources <ul style="list-style-type: none"> None identified. Energy <ul style="list-style-type: none"> None identified. Water Supply & Waste Water Treatment <ul style="list-style-type: none"> None identified. Transport Infrastructure <ul style="list-style-type: none"> None identified. Broadband Communications <ul style="list-style-type: none"> Deliver services using broadband to offset rural access issues. Health Care, Schools, Sports, Leisure & Community Centres <ul style="list-style-type: none"> None identified.

Sustainable Communities

Challenges & Opportunities	
Authority-wide	
Challenges	Opportunities
Population <ul style="list-style-type: none"> Potential decline in size of working age population. 	Population <ul style="list-style-type: none"> None identified. Deprivation

<ul style="list-style-type: none"> • High concentration of people over the age of 45 in public services and manufacturing. • Increase in size of elderly population. <p>Deprivation</p> <ul style="list-style-type: none"> • Provide higher value employment, address skills/training needs, health inequalities and access to services. <p>Public Health</p> <ul style="list-style-type: none"> • Avoid adverse health impacts from development. • Responding to issues of climate change, energy and food security, resource depletion and waste management. • Ensuring community and stakeholder engagement in governance, delivery, implementation and management. • Control the availability of unhealthy food outlets. • Address barriers to participation such as transport costs and childcare. <p>Crime & Safety</p> <ul style="list-style-type: none"> • None identified. 	<ul style="list-style-type: none"> • Regeneration projects to improve a sense of place and design out of crime. <p>Public Health</p> <ul style="list-style-type: none"> • Providing a healthy living environment: Housing, accessibility, parks and greenspace. • Promoting and facilitating healthy lifestyles. • Providing good access to health facilities and services. • Improving existing cycle-ways or footpaths. • Develop stronger links with NHS and their Workplace health initiatives. <p>Crime & Safety</p> <ul style="list-style-type: none"> • Work closely with West Mercia Police.
Telford	
Challenges	Opportunities
<p>Population</p> <ul style="list-style-type: none"> • Ensuring that the skill levels of the young meet the needs of local employers. <p>Deprivation</p> <ul style="list-style-type: none"> • Reverse local deprivation. <p>Public Health</p> <ul style="list-style-type: none"> • Design of some estates. <p>Crime & Safety</p> <ul style="list-style-type: none"> • Addressing the failures of the Radburn estate layouts. 	<p>Population</p> <ul style="list-style-type: none"> • None identified. <p>Deprivation</p> <ul style="list-style-type: none"> • Promote multi-agency engagement with local communities to meet local needs. <p>Public Health</p> <ul style="list-style-type: none"> • Engage with older adults during regeneration projects. <p>Crime & Safety</p> <ul style="list-style-type: none"> • None identified.
Newport	
Challenges	Opportunities
<p>Population</p> <ul style="list-style-type: none"> • Potential reduction in the working age population unless in-migration occurs. <p>Deprivation</p> <ul style="list-style-type: none"> • None identified. <p>Public Health</p> <ul style="list-style-type: none"> • Deliver the housing and community needs for the elderly. <p>Crime & Safety</p> <ul style="list-style-type: none"> • None identified. 	<p>Population</p> <ul style="list-style-type: none"> • None identified. <p>Deprivation</p> <ul style="list-style-type: none"> • None identified. <p>Public Health</p> <ul style="list-style-type: none"> • None identified. <p>Crime & Safety</p> <ul style="list-style-type: none"> • None identified.

Rural Areas	
Challenges	Opportunities
Population <ul style="list-style-type: none"> Isolation of ageing populations in the rural areas; A decline in working population; Low levels of younger age groups living in the rural areas. Deprivation <ul style="list-style-type: none"> To cater for a diffuse but potentially increasing amount of rural deprivation. Public Health <ul style="list-style-type: none"> None identified. Crime & Safety <ul style="list-style-type: none"> None identified. 	Population <ul style="list-style-type: none"> None identified. Deprivation <ul style="list-style-type: none"> None identified. Public Health <ul style="list-style-type: none"> None identified. Crime & Safety <ul style="list-style-type: none"> None identified.

Environmental Sustainability

Challenges & Opportunities	
Authority-wide	
Challenges	Opportunities
Geological Sites & Soils <ul style="list-style-type: none"> Ensure consideration of Local Geological Sites at all levels of planning and land use. Encourage the public and interested groups to become aware of and involved in geological conservation. Improve access to exposures and create new geological trails. Biodiversity <ul style="list-style-type: none"> Enhance habitat connectivity and avoiding new severance. Ensure that there is no net loss of biodiversity. Avoid and offset impacts on habitats and species from development proposals. Green Infrastructure <ul style="list-style-type: none"> Improving signage and awareness of natural and semi natural open spaces. Provide two new facilities for young people in the southern and central areas of the town, or address need associated with new residential development. Landscape & Townscape <ul style="list-style-type: none"> Protect the landscapes of the valley bottoms. Improve settlements with an unsympathetic edge with the countryside. 	Geological Sites & Soils <ul style="list-style-type: none"> Promote improved understanding of geological processes, evolution / past life forms and the effects of earlier cycles of climate change. Promoting the economic / tourism potential of geodiversity assets. Biodiversity <ul style="list-style-type: none"> Enhance access to green spaces without detrimental effects. Recognise potential ecological value of pitmounds, old quarries and brownfield sites, ponds. Green Infrastructure <ul style="list-style-type: none"> Provide new amenity green space in the eastern area should the opportunity arise. Given limited access to Chetwynyd Park, consider new amenity space in the northern area. Convert amenity spaces or natural areas to parks in the south of Newport to address deficiencies in these types of open space. Baddeleys Well natural area to the south of Newport could see combined provision of natural open space and formalised park. Provide natural and semi natural open space on the edge of Newport. Combine natural and semi natural spaces with other types of open space.

<ul style="list-style-type: none"> • Reduce the amount of highway related signs and street furniture to enhance sense of place. <p>Historic Environment</p> <ul style="list-style-type: none"> • Assists in maintaining the historic environment. • Address challenges at Iron Bridge Gorge WHS. • Balance the needs of conservation, access, sustainable growth and needs of residents. • Decommission of Eon Power Station by 2015 represents a major development opportunity/threat within WHS setting. • Balance the need for productive use of isolated historic farmsteads with need to enhance the viability of larger rural settlements. <p>Air Quality & Greenhouse Gas Emissions</p> <ul style="list-style-type: none"> • Integrate waste management and decentralised energy. • Increase density of development to help make district energy viable. <p>Adaptation to Climate Change</p> <ul style="list-style-type: none"> • Increased risk of flooding and high summer temperatures. • Minimise rainwater runoff. <p>Noise</p> <ul style="list-style-type: none"> • Identify and protect quiet urban areas from increasing noise levels. <p>Water Quality & Flooding</p> <ul style="list-style-type: none"> • Protect functional floodplains. • Ensuring development causes no deterioration in water body status, as required by the Water Framework Directive, 	<p>Landscape & Townscape</p> <ul style="list-style-type: none"> • Improve landscape quality and local distinctiveness through selection and use of materials appropriate to local setting. • Protect and enhance green spaces of identified value particularly at Telford Town Park. • Sustain ecosystem services, landscape and biodiversity. • Reduce light pollution to sensitive areas. • Identify where enhanced design could improve sense of place. <p>Historic Environment</p> <ul style="list-style-type: none"> • Contribute to local distinctiveness and a sense of place. • Develop heritage led regeneration opportunities, including tourism, traditional building skills; <p>Air Quality & Greenhouse Gas Emissions</p> <ul style="list-style-type: none"> • Promote Code for Sustainable Homes, BREEAM and CEEQUAL assessments. • Promote decentralised energy via new development. • High quality and energy efficiency standards and Improve sustainable transport options. <p>Adaptation to Climate Change</p> <ul style="list-style-type: none"> • Promote low carbon renovation of the housing stock. • Design buildings adapted to climate change and show case innovative design features. <p>Noise</p> <ul style="list-style-type: none"> • None identified. <p>Water Quality & Flooding</p> <ul style="list-style-type: none"> • Open culverts and enhance river corridors. • Apply sustainable urban drainage principles.
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3.102 The overall key challenges were identified as follows:

- Delivery of a skilled and healthy workforce able to retain/attract the businesses able to expand over the next 15 years.
- To provide timely capacity for the management of resources at material assets in an efficient manner to underpin economic development and demographic change.

- To enhance the health of the community and reduce health inequalities to a) address the needs of the increasing elderly population and b) to help deliver a healthy workforce.
- Develop an understanding of the services provided by the natural environment and value those assets found within Telford & Wrekin to develop a landscape scale or area-wide management strategy.

4.0 Consideration of Plan-Making Options and Alternatives in the IA

Introduction

- 4.1 The development of plan-making options and the SA/SEAs of alternatives have been on-going throughout the production of the Local Plan and its accompanying SA. This section sets out the history of the SA of alternatives and options assessment to date. It summarises how options have been identified, assessed and progressed through different stages of plan-making; it summarises and refers to SAs that have been undertaken and outlines how the findings of these SAs have influenced different stages of the Local Plan. This section also sets out the reasons why alternatives have been rejected or selected.

Assessment of Alternatives in SA/SEA

- 4.2 The EU SEA Directive⁷⁷ requires assessment of the likely significant effects of implementing the plan and “reasonable alternatives” taking into account “the objectives and geographical scope” of the plan and the reasons for selecting alternatives should be outlined in the Report. The Directive does not specifically define the term “reasonable alternative”; however, UK SA/SEA guidance⁷⁸ advises that it should be taken to mean “realistic and relevant” i.e. deliverable and within the timescale of the plan. This approach has been confirmed in recent case law⁷⁹ - an option which does not achieve the objectives of the plan is not a reasonable alternative.
- 4.3 Extant SEA guidance⁸⁰ sets out an approach and methods for developing and assessment of alternatives. This includes acknowledgement of a hierarchy of alternatives that are relevant and proportionate to the tiering of plan-making. Alternatives considered at the early stages of plan-making need not be elaborated in too much detail so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation. This is confirmed by the NPPF that requires that assessments should be proportionate (paragraph 167). The hierarchy of alternatives may be summarised in the following diagram:

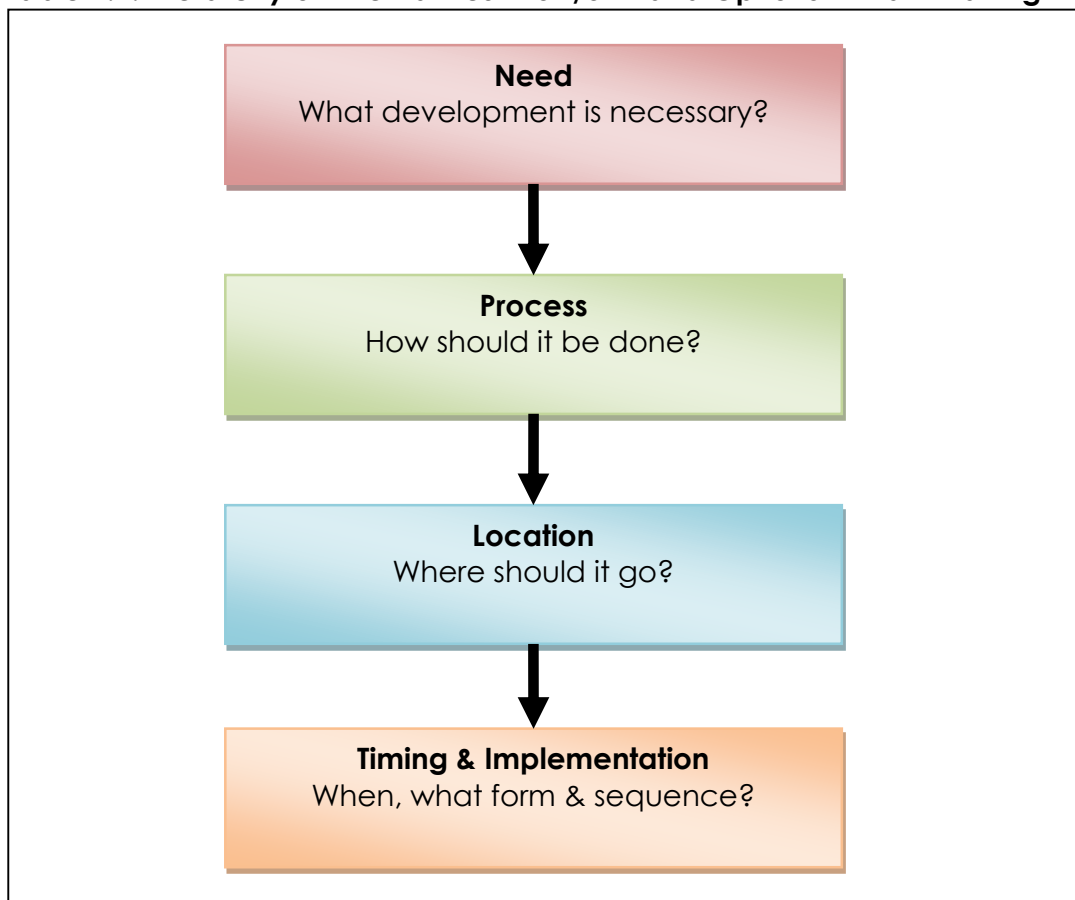
⁷⁷ <http://ec.europa.eu/environment/eia/sea-legalcontext.htm>

⁷⁸ <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

⁷⁹ <http://www.bailii.org/ew/cases/EWHC/Admin/2015/776.html>

⁸⁰ <http://www.pas.gov.uk/pas/core/page.do?pagelid=152450>

Table 4.1: Hierarchy of Alternatives in SA/SEA and Options in Plan-Making



- 4.4 Case law in England has clarified and provided further guidance for current practice on how alternatives should be considered in SA/SEA of spatial and land use plans. The Forest Heath Judgment⁸¹ confirmed that the reasons for selecting or rejecting alternatives should be explained, and that the public should have an effective opportunity to comment on appraisal of alternatives. The SA report accompanying the draft plan must refer to, summarise or repeat the reasons that had been given in earlier iterations of the plan and SA, and these must still be valid.
- 4.5 The Broadlands Judgment⁸² drew upon the Forest Heath findings and further set out that, although not an explicit requirement in the EU SEA Directive, alternatives should be appraised to the same level as the preferred option; the final SA Report must outline the reasons why various alternatives previously considered are still not as good as the proposals now being put forward in the plan, and must summarise the reasons for rejecting any reasonable alternatives - and that those reasons are still valid. The Cogent Judgment⁸³ confirmed that Rochford District Council had adequately explained how it had carried out the comparative assessment of competing sites and that any shortcomings in the early process had been resolved by the publication of an SA Addendum Report. This judgment and the conclusion that defects at an

⁸¹ Save Historic Newmarket Ltd v Forest Heath District Council (2011) EWHC 606

⁸² Heard v Broadland District Council, South Norfolk District Council, Norwich City Council (2012) EWHC 344

⁸³ Cogent Land LLP v Rochford District Council (2012) EWHC 2542

earlier stage of the SA/SEA process can in principle be addressed at a later stage has recently been upheld at the Court of Appeal⁸⁴.

- 4.6 A High Court decision⁸⁵ in 2014 found that the choice of alternatives for environmental assessment is a matter of planning judgment. In *Ashdown Forest Economic Development LLP, Sales, J* held that the planning authority has a substantial area of discretion as to the extent of the inquiries which need to be carried out to identify the reasonable alternatives which should then be examined in greater detail. On 9 July 2015, the Court of Appeal reversed the decision of Sales, J on the grounds that the local planning authority had adopted the impugned policy in breach of the duty under regulation 12 of the SEA Regulations relating to the assessment of reasonable alternatives.⁸⁶ It is important to note that the Court of Appeal confirmed the Sales, J's analysis that the identification of reasonable alternatives is a matter of evaluative assessment for the local planning authority, subject to review by the court on normal public law principles, including *Wednesbury* unreasonableness.⁸⁷ However, the Court of Appeal held that, in order to make a lawful assessment, a local planning authority does at least have to apply its mind to the question of reasonable alternatives. On the particular facts of the *Ashdown Forest* case, the Court of Appeal found that there was no evidence that the local planning authority gave any consideration to the question of reasonable alternatives to the 7km zone excluding new housing development in the vicinity of the Ashdown Forest SPA.
- 4.7 Under the SEA Directive and Environmental Assessment Regulations 2004, it is the plan-making authority that is the primary decision-maker in relation to identifying what is to be regarded as a reasonable alternative. This was further confirmed recently in *FoE v Welsh Ministers* (March, 2015)⁸⁸ that the evaluation of which alternatives should be included is a matter primarily for the decision-making authority.

Assessment of Options in Plan-Making

- 4.8 Development planning issues, such as how much, what kind of development and where, are considered within the requirements of legislation and policy together with the characteristics of the plan area and the views of its communities. Potential options for resolving such issues are identified by the Councils through various studies, such as population projections and housing need, community strategies, infrastructure capacities, and environmental constraints analysis - and through consultation with the regulators, the public, businesses, service providers, and the voluntary sector.
- 4.9 At the earlier and higher levels of strategic planning, options assessment is proportionate and may have a criteria-based approach and/or expert judgment; the focus is on the key differences between possibilities for scale,

⁸⁴ No Adastral New Town v Suffolk Coastal District Council (2015) EWCA Civ 88

⁸⁵ *Ashdown Forest Economic Development LLP v SSCLG, Wealden District Council and South Downs National Park Authority* [2014] EWHC 406 (Admin).

⁸⁶ *Ashdown Forest Economic Development LLP v Wealden DC* [2015] EWCA Civ 681

⁸⁷ *Ibid.*, at paragraph [42], per Richards, LJ delivering the sole judgment of the Court of Appeal.

⁸⁸ <http://www.bailii.org/ew/cases/EWHC/Admin/2015/776.html>

distribution and quality of development. At this early stage, the options presented may constitute a range of potential measures (which could variously and/or collectively constitute a policy) rather than a clear spatial expression of quantity and quality. Each option is not mutually exclusive and elements of each may be further developed into a preferred option. As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.

- 4.10 At the later and lower levels of development planning for site allocations, options assessment tends to be more specific, often focused on criteria and thresholds, such as land availability, accessibility to services and impacts on local landscape, and particularly informed by technical studies such as the Strategic Housing Market Assessment (SHMA), the Strategic Housing Land Availability Assessment (SHLAA), and Strategic Flood Risk Assessment (SFRA). There is a hierarchy of options assessment with sites that are not viable or deliverable or might have adverse effects on protected environmental assets rejected at an early stage.
- 4.11 The role of the IA is to inform a Council in their selection and assessment of options; IA is undertaken of those reasonable alternatives (options) identified through the plan-making process. The findings of the IA can help with refining and further developing these options in an iterative and ongoing way. The IA findings do not form the sole basis for decision making - this is informed also from planning and other studies, feasibility, and consultation feedback.

IA Findings and Reasons for Selecting/Rejecting Alternatives in the Local Plan

Options for the Level of Growth

- 4.12 The Shaping Places Strategy & Options Document published in June 2013 proposed three reasonable options for the overall level of housing growth up to 2031, which are set out in the table below.

Table 4.2: Shaping Places Strategy & Options Growth Options (2013)

Option	Annual rate of development	Target (approx.) 2011-2031
1. Housing Completion Lead	682	13,640
2. Planned Growth	890	17,800
3. Hub for Growth & Business	1,325	26,500

- 4.13 Option 1 was based on the previous three year trend in housebuilding (net completions) plus an allowance for small windfall sites using data presented in the Council's Annual Monitoring Reports. Option 2 was based on an assessment of likely completions from known development sites together with other sites, principally through partnership working with the Homes and Communities Agency that could be brought forward during the plan period. Option 3 builds on Option 2, with the figure derived from an assessment of local land capacity at the local level carried out by the Council, which would

support the potential development opportunities and delivery of future growth to underpin Telford and Wrekin's role in the sub-region.

- 4.14 The three reasonable growth options were appraised by the Council against the SA Framework with the findings presented in the Shaping Places Strategy & Options SA Report (June 2013)⁸⁹ which accompanied the Shaping Places Strategy & Options Document on public consultation from 10th June to 26th July 2013. The summary findings of the SA are presented in the table below and helped to inform the selection and rejection of options in plan-making. The detailed appraisal matrices are presented in Appendix IV of this Report.

Table 4.3: Summary of SA Findings for Housing Growth Options (2013)

Sustainability Objectives	Housing Growth Options		
	Option 1 - 13,640	Option 2 - 17,800	Option 3 - 26,500
Sustainable Economic Development			
1 To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups.	Major Negative Effect In this option growth comes mostly from existing committed sites and they are not targeted to support action in areas experiencing deprivation or rural isolation. Mitigation: how best to support regeneration should be considered.	Moderate Negative Effect / Major Negative Effect In this option, to enable this level of growth some of the development will have to occur in rural areas, however most of the existing development sites are still largely contained in the urban area. They are not targeted to support action in areas experiencing deprivation or rural isolation. Mitigation: how best to support regeneration should be considered.	Moderate Positive Effect / ? Under this option, to enable this level of growth some of the development could potentially occur by target intervention areas, thus benefiting those areas.
2 To reduce the number of people with difficulties accessing employment, education	Moderate Positive Effect In this option growth comes mostly from existing committed sites	Minor Positive Effect / Moderate Positive Effect In this option growth comes mostly from existing development sites,	? Location of development is yet to be determined. Therefore it is difficult to determine impact.

⁸⁹ Telford & Wrekin Council (2013) Shaping Places Strategy & Options SA Report. Available online: http://telford-consult.objective.co.uk/portal/shaping_places/shaping_places_local_plan/shaping_places_strategy_options?pointId=2476452

and training opportunities.	and these are largely in relatively accessible locations within urban boundaries.	largely contained in the urban area. However, the rural development sites are quite isolated. Distribution of sites are key – need to be located where they can reduce the need to travel.	
3 To ensure an appropriate supply of employment land and starter business premises.	Major Positive Effect This option will not require any existing employment land to be reallocated as housing land. Over 200 ha of potential deliverable employment land available.	Major Positive Effect This option will not require any existing employment land to be reallocated as housing land. Over 200 ha of potential deliverable employment land available.	Major Positive Effect This option will not require any existing employment land to be reallocated as housing land. Over 200 ha of potential deliverable employment land available.
4 Improve the supply and affordability of accommodation for all groups in areas of greatest need.	Major Negative Effect If much of the affordable housing is likely to be delivered in association with private market developments, the supply will not improve in this scenario as the level of market developments is low. The plan policy approach must increase the level of affordable housing supply and also address the needs of an ageing population and provision for gypsies and travellers.	Moderate Positive Effect / Major Positive Effect This option will increase the number of houses built per annum. This level of housing would meet the need for affordable housing and thus have a positive effect on this objective.	Major Positive Effect This option will significantly increase the number of houses built per annum. This level of housing would meet the need for affordable housing and thus have a significant positive effect on this objective.
5 Locate housing in areas with good	Moderate Positive Effect In this option growth comes	Minor Positive Effect / Moderate Positive Effect	? Location of development is yet to be determined.

accessibility to employment, services and amenities.	mostly from existing committed sites and these are largely in relatively accessible locations within urban boundaries.	In this option growth comes mostly from existing development sites, largely contained in the urban area. However, the rural development sites are quite isolated. Distribution of sites are key – need to be located where they can reduce the need to travel.	Therefore it is difficult to determine impact.
Resource Management & Material Assets			
6 To deliver continued reduction in the quantities of waste being generated and the quantities being disposed of at landfill.	<p>Moderate Negative Effect / Major Negative Effect</p> <p>A new waste contract will be in place during the life-span of Shaping Places. All residual waste to be bulked and sent for incineration. Higher volumes of waste that is sent for incineration, will generate higher costs to the Authority.</p> <p>However, this could be mitigated if sustainable design and construction techniques are employed. Additionally any planning policy should encourage the waste hierarchy to enable more re-use and recycling of waste.</p>	<p>Moderate Negative Effect / Major Negative Effect</p> <p>A new waste contract will be in place during the life-span of Shaping Places. All residual waste to be bulked and sent for incineration. Higher volumes of waste that is sent for incineration, will generate higher costs to the Authority.</p> <p>However, this could be mitigated if sustainable design and construction techniques are employed. Additionally any planning policy should encourage the waste hierarchy to enable more re-use and recycling of waste.</p>	<p>Major Negative Effect</p> <p>A new waste contract will be in place during the life-span of Shaping Places. All residual waste to be bulked and sent for incineration. Higher volumes of waste that is sent for incineration, will generate higher costs to the Authority.</p> <p>However, this could be mitigated if sustainable design and construction techniques are employed. Additionally any planning policy should encourage the waste hierarchy to enable more re-use and recycling of waste.</p>
7 To reduce the quantities of primary	<p>Moderate Negative Effect /</p>	<p>Moderate Negative Effect /</p>	<p>Major Negative Effect</p>

aggregate required for building and infrastructure projects by maximising the use of secondary aggregates as well as to protect mineral resources from sterilisation.	Major Negative Effect Construction of 682 new homes every year could considerably increase use of primary aggregate. However, such effects could be mitigated if sustainable design and construction techniques are employed and extracting targets adopted through Site Waste Management Plans.	Major Negative Effect Construction of 890 new homes every year could considerably increase use of primary aggregate. However, such effects could be mitigated if sustainable design and construction techniques are employed and extracting targets adopted through Site Waste Management Plans.	Construction of 1,325 new homes every year could considerably increase use of primary aggregate. However, such effects could be mitigated if sustainable design and construction techniques are employed and extracting targets adopted through Site Waste Management Plans.
8 To minimise demand upon water resources and to enable the timely provision of adequate waste water treatment to support increased housing provision.	Moderate Positive Effect Based upon current water infrastructure this option can be supported	Moderate Positive Effect Based upon current water infrastructure this option can be supported	Moderate Negative Effect / Major Negative Effect New water infrastructure would need to be constructed to support this option.
9 To make travel more reliable and efficient, as well as enhance access to jobs, education, healthcare, shops and leisure.	Moderate Positive Effect In this option growth comes mostly from existing committed sites and these are largely in relatively accessible locations within urban boundaries.	Minor Positive Effect / Moderate Positive Effect In this option growth comes mostly from existing development sites, largely contained in the urban area. However, the rural development sites are quite isolated. Locate development with good access to SLCS, town and district centres and employment opportunities.	? Location of development is yet to be determined. Therefore it is difficult to determine impact.

<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>	<p>Minor Positive Effect / Moderate Positive Effect</p> <p>An increase in population, economic activity would also increase local government receipts: Council Tax, Business Rates, New Homes Bonus etc) which could positively affect the level to which the public sector can invest in local community facilities. The larger scale of development proposed, more likely to support developer contributions for community facility provision.</p>	<p>Moderate Positive Effect / Major Positive Effect</p> <p>An increase in population, economic activity would also increase local government receipts: Council Tax, Business Rates, New Homes Bonus etc) which could positively affect the level to which the public sector can invest in local community facilities. The larger scale of development proposed, more likely to support developer contributions for community facility provision.</p>	<p>Major Positive Effect</p> <p>An increase in population, economic activity would also increase local government receipts: Council Tax, Business Rates, New Homes Bonus etc) which could positively affect the level to which the public sector can invest in local community facilities. The larger scale of development proposed, more likely to support developer contributions for community facility provision.</p>
<p>Sustainable Communities</p>			
<p>11 To achieve a population profile in balance with the employment opportunities that the travel to work area is able to provide.</p>	<p>?</p> <p>Insufficient Information</p>	<p>?</p> <p>Insufficient Information</p>	<p>?</p> <p>Insufficient Information</p>
<p>12 To provide an environment that helps retain well-educated members of the work force.</p>	<p>?</p> <p>Insufficient Information</p>	<p>?</p> <p>Insufficient Information</p>	<p>?</p> <p>Insufficient Information</p>
<p>13 To improve the health and well-being of the population to meet the needs of the vulnerable</p>	<p>?</p> <p>Insufficient Information</p>	<p>?</p> <p>Insufficient Information</p>	<p>?</p> <p>Insufficient Information</p>

and ageing population.			
14 To create opportunities for the community to reduce levels of obesity.	? Insufficient Information	? Insufficient Information	? Insufficient Information
15 To enable vulnerable people to live independently .	? Insufficient Information	? Insufficient Information	? Insufficient Information
16 To ensure urban design and layout contributes towards reducing the potential for crime.	? Insufficient Information	? Insufficient Information	? Insufficient Information
Environmental Sustainability			
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.	Moderate Positive Effect Commitments are within the settlements and therefore unlikely to have an impact.	Moderate Positive Effect Commitments are within the settlements and therefore unlikely to have an impact.	Moderate Negative Effect /? In order to accommodate growth, may lead to increased development pressure on the Weald area of peats. However, this is dependent on spatial distribution which is yet to be determined. Mitigation: give preference to sites that limit development pressure on the Weald area of peats.
18 To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.	Minor Positive Effect This option will not require significant amounts of designated open space to be allocated as housing land. The resources available for open space	Minor Positive Effect This option will not require significant amounts of designated open space to be allocated as housing land. The resources available for open space enhancement will	Minor Negative Effect / Moderate Negative Effect While this option may require significant amount of open space to be allocated as housing land. Resources will be available to

	enhancement will however be limited.	however be limited.	enhance remaining sites.
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.	Minor Positive Effect This option will not require significant amounts of designated open space to be allocated as housing land. The resources available for open space enhancement will however be limited.	Minor Positive Effect This option will not require significant amounts of designated open space to be allocated as housing land. The resources available for open space enhancement will however be limited.	Minor Negative Effect / Moderate Negative Effect While this option may require significant amount of open space to be allocated as housing land. Resources will be available to enhance remaining sites.
20 To manage the landscape effects of development in recognition of European Landscape Convention.	Minor Positive Effect Housing commitments are within the settlements and therefore not likely to have a major impact on sensitive landscapes.	Minor Positive Effect Housing commitments are within the settlements and therefore not likely to have a major impact on sensitive landscapes.	Moderate Negative Effect / ? In order to accommodate growth, may increase the risk of affecting the setting or causing a visual intrusion to the landscape. This would be particularly significant if it affected areas of landscape designation. However, this is dependent on spatial distribution which is yet to be determined.
21 To enhance, conserve and protect buildings, sites, and the setting of historic assets to the urban environment as part of development projects.	? Insufficient information	? Insufficient information	? Insufficient information

<p>22 To reduce annual CO2 emissions by 60% from 1990 levels, by 2050 (36% by 2026).</p>	<p>Minor Negative Effect / Moderate Negative Effect</p> <p>The significant population increase and the energy used during the construction and subsequent occupation of the new dwellings is likely to lead to a net increase in energy demand across the Borough. Given the scale of the development proposed, there is the potential for the new homes to include low carbon technologies within their design and to use low carbon materials within their construction. The potential to which this is realised will depend on whether ambitious sustainability targets (such as those that exceed the Code for Sustainable Homes) are used.</p>	<p>Moderate Negative Effect / Major Negative Effect</p> <p>The significant population increase and the energy used during the construction and subsequent occupation of the new dwellings is likely to lead to a net increase in energy demand across the Borough. Given the scale of the development proposed, there is the potential for the new homes to include low carbon technologies within their design and to use low carbon materials within their construction. The potential to which this is realised will depend on whether ambitious sustainability targets (such as those that exceed the Code for Sustainable Homes) are used.</p>	<p>Moderate Negative Effect / Major Negative Effect</p> <p>The significant population increase and the energy used during the construction and subsequent occupation of the new dwellings is likely to lead to a net increase in energy demand across the Borough. Given the scale of the development proposed, there is the potential for the new homes to include low carbon technologies within their design and to use low carbon materials within their construction. The potential to which this is realised will depend on whether ambitious sustainability targets (such as those that exceed the Code for Sustainable Homes) are used.</p>
<p>23 To deliver a built environment that is well adapted to cope with the changing weather conditions that are forecast.</p>	<p>?</p> <p>Insufficient information</p>	<p>?</p> <p>Insufficient information</p>	<p>?</p> <p>Insufficient information</p>
<p>24 Incorporate measures into development proposals that</p>	<p>Neutral</p> <p>The expected increase in new buildings would</p>	<p>Neutral</p> <p>The expected increase in new buildings would</p>	<p>Neutral</p> <p>The expected increase in new buildings would</p>

contribute towards a reduction in flood risk aimed at providing a runoff rate less than greenfield rates.	lead to (given latest planning requirements) to higher design standard, incorporating requirements in the NPPF and achieve runoff rates consistent with existing Greenfield runoff rates.	lead to (given latest planning requirements) to higher design standard, incorporating requirements in the NPPF and achieve runoff rates consistent with existing Greenfield runoff rates.	lead to (given latest planning requirements) to higher design standard, incorporating requirements in the NPPF and achieve runoff rates consistent with existing Greenfield runoff rates.
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- 4.15 The SA concluded in Para 7.17 of the Shaping Places Strategy & Options SA Report that a level of compromise needs to be reached across the sustainability objectives. The SA at that stage recommended that Option 3 offered the greatest potential to achieve the appropriate balance (to optimise growth and minimise detrimental environmental effects). However, it noted that careful consideration would be required with regard to the proposed location of development to avoid sensitive sites, to optimise positive community effects and to take the opportunity to maximise the benefits of innovative sustainable design (by ensuring efficient use of land and resources) to mitigate any potentially significant negative impacts.
- 4.16 The Council's view set out in the Shaping Places Strategy & Options Document (2013) was that Option 3 was the most appropriate to progress in plan-making, for the following reasons:
- Option 1 is based on past trends only and does not provide any scope to plan effectively to deliver on the economic opportunities that exist or support the continued sustainability of local services. Consequently, this is considered to be a more short term option rather than looking longer term and into the future. This, therefore, does not provide the Council with the opportunity to plan effectively to deliver development at the scale envisaged;
 - Options 1 and 2 lack the flexibility to respond to opportunities for development and lessens the ability of the Council to plan for the needs of local communities, or deliver the economic growth aspirations of the plan.
 - Option 3 provides the opportunity to invest in local communities to address service deficiencies, tackle housing need and improve existing infrastructure and the quality of our centres. It allows the Borough to become a focal point for business investment offering new job opportunities; acknowledges Telford and Wrekin's role as focal point for housing and jobs growth, and as a 'destination of choice' supports the town to achieve its original planned size of under 200,000 people; supports the growth and development of Telford town centre and the regeneration of the borough's older neighbourhoods

- 4.17 The responses received in relation to the Shaping Places Strategy & Options Document were broadly supportive of growth; however, concerns were raised over lack of evidence in support of preferred housing requirement figure, how achievable/deliverable it is, potential impact on green spaces and lack of reference to the economic implications of growth⁹⁰. While supporting the overall objective of growth, responses from a wide range of stakeholders (including neighbouring authorities, the development industry and local residents) suggested that a more realistic Plan target lay between Options 2 and 3 identified in the Strategy & Options Document (2013).
- 4.18 In response to the consultation comments received and to ensure compliance with the National Planning Policy Framework (NPPF) the Council decided that further technical work would be needed to establish and justify the overall housing requirement for the Plan area. The Strategic Housing Market Assessment⁹¹ for the Borough was updated in February 2014. It should be noted that this will be under further review by the Council. Taking account of both the requirement for affordable housing from the existing population between 2011 and 2016 and the requirements for all housing arising from projected household growth over the period 2011-2031, the updated SHMA (Feb 2014) concluded that there is a net requirement for 18,691 additional dwellings in the Telford and Wrekin area between 2011 and 2031. It should be noted that this figure was derived from trend-based analysis, which means there was an assumption that recent past trends will carry on unchanged into the future.
- 4.19 The updated SHMA provided the basis for the level of housing, 20,000 new dwellings, suggested within the Proposed Housing and Employment Sites (PHES) Document⁹² published in May 2014. The PHES Document stated in Para 3.21 that the growth target was slightly higher than identified in the updated SHMA (Feb 2014) as a result of the following factors, including the government's planning policy objectives to boost housing supply:
- recognising that Telford's infrastructure was designed to cater for a substantially
 - larger population (over 200,000);
 - the aim to balance growth in the borough to deliver priorities, new homes and employment within the strong green setting;

⁹⁰ Telford & Wrekin Council (Dec 2013) Summary of comments received as part of the Strategy & Options consultation. Available online:
http://www.telford.gov.uk/downloads/file/1395/shaping_places_local_plan_strategy_and_options_summary_of_comments_december_2013

⁹¹ Strategic Housing Market Assessment: Telford and Wrekin Council (Feb 2014) Final Report. Prepared by Housing Vision. Available online:
http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/541/strategic_housing_market_assessment

⁹² Telford & Wrekin Council (May 2014) Proposed Housing and Employment Sites. Available online:
http://www.telford.gov.uk/downloads/download/226/proposed_housing_and_employment_sites_document_2014

- the economic growth aspirations of the emerging Local Plan and the overall support for growth received through the Strategy & Options consultation;
- the objective to increase delivery above past performance of completion rates seen over the longer term (approximately 700 dwellings each year on average between 1995 and 2013);
- the substantial supply of identified and serviced land and the scale of deliverability. The borough has over 600 acres of land available for employment development and has planning permission for 11,885 homes, supported by many national house builders who are committed to investment in the borough;
- the scale of affordable housing needs identified based on the most up to date evidence available;
- duty to cooperate as directed by government which requires us to consider the potential for supporting unmet housing and employment needs of neighbouring authorities;
- national planning policy objectives seeking to significantly boost housing supply;
- the impact of other factors that influence the calculation of a dwelling target, for example the number of vacant and second homes that exist.

- 4.20 The Council considered that a growth level of 20,000 new dwellings was more appropriate than the previously preferred 26,500 homes identified within the Shaping Places Strategy & Options Document (2013) as it takes into consideration consultation responses and further technical work (the updated SHMA). The Council stated in Para 3.22 of the PHES Document that the revised housing requirement of 20,000 new dwellings will balance the need for development while at the same time protecting the network of interconnected green open spaces.
- 4.21 The pre-draft plan consultations carried out at the S&O and PHES stages did not establish any consensus on which option was preferred. However, comments did raise the issue of a lack of clear justification for the levels of growth put forward as options. The development of a robust evidence base to underpin the new housing requirements for the borough was clearly a priority in the lead-up to the Draft Local Plan.
- 4.22 Following the publication of the Updated SHMA and PHES Documents, more up to date national household and population projections were issued by the Office for National Statistics (ONS). To take account of this updated evidence the Council commissioned independent consultants to provide an objective assessment of need for both housing and economic growth in the plan period to 2031. The Objectively Assessed Housing Need (OAHN) Final Report⁹³ was published in March 2015. The report concluded that the minimum objectively assessed housing need for the Borough during the life of the Plan is 9,940 dwellings or 497 dwellings per annum (dpa). Taking account

⁹³ Telford & Wrekin Council (March 2015) Objectively Assessed Housing Need Final Report. Prepared by PBA. Available online:
http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/911/objectively_assessed_need

of the findings of this further technical work and the NPPF's objective 'to boost significantly the supply of housing' as well as the requirement for the duty to cooperate, the Council identified three reasonable options for the overall level of housing growth, which are as follows:

- Option 1 - 11,250 dwellings
- Option 2 - 15,000 to 16,000 dwellings
- Option 3 - 20,000 dwellings

- 4.23 Option 1 is considered to be a reasonable option because it would ensure that the full assessed housing need up to 2031 would be met as identified in the OAHN. It is considered to be a 'minimum' option as it is a level of growth that is 'needs-based' only. The slight uplift from the OAHN is based on an additional allowance for vacancies and losses in the existing dwelling stock. The calculation to determine these allowances are set out in the Housing Requirements Technical Paper.
- 4.24 Option 2 is considered to be a reasonable option because it would support a significant boost in housing supply over and above what is needed during the plan period (option 1). The option also takes into account the potential for 'above-trend' in-migration from surrounding areas, should the demand exist to support it.
- 4.25 Option 3 is considered to be a reasonable option because it recognises the land capacity that is currently identified in the borough, but is not so high as to be unreasonable when compared to past delivery rates.
- 4.26 Enfusion (specialists in sustainability and environmental assessment) were commissioned in January 2015 to assist the Council to progress the IA process for the Local Plan. Enfusion undertook an independent comparative appraisal of the three options above against the full SA Framework using updated evidence where available. The summary findings of the SA for the three options are presented below with the detailed appraisals provided in Appendix V.

Table 4.4: Summary of IA Findings for Growth Options (2015)

SA Objectives	Housing Growth Options		
	1 11,250	2 15 - 16,000	3 20,000
Sustainable Economic Development			
1 To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups.	+	+	+
2 To reduce the number of people with difficulties accessing employment, education and training opportunities.	+ ?	?	?
3 To ensure an appropriate supply of employment land and starter business premises.	0	0	0
4 Improve the supply and affordability of accommodation for all groups in areas of greatest need.	++ ?	++ ?	++ ?

5 Locate housing in areas with good accessibility to employment, services and amenities.	+	+	+
Resource Management & Material Assets			
6 To deliver continued reduction in the quantities of waste being generated and the quantities being disposed of at landfill.	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.	?	- ?	-
8 To minimise demand upon water resources and to enable the timely provision of adequate waste water treatment to support increased housing provision.	0 ?	- ?	-- ?
9 To make travel more reliable and efficient, as well as enhance access to jobs, education, healthcare, shops and leisure.	+ ?	+	++
10 To work with other service providers to enable the timely provision of community facilities to accord with the delivery of new houses.	+ ?	+	++
Sustainable Communities			
11 To achieve a population profile in balance with the employment opportunities that the travel to work area is able to provide.	+ ?	?	?
12 To provide an environment that helps retain well-educated members of the work force.	+ ?	?	?
13 To improve the health and well-being of the population to meet the needs of the vulnerable and ageing population.	+ ?	+	++
14 To create opportunities for the community to reduce levels of obesity.	+ ?	+	++
15 To enable vulnerable people to live independently.	+ ?	+	++
16 To ensure urban design and layout contributes towards reducing the potential for crime.	0	0	0
Environmental Sustainability			
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.	?	?	?
18 To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.	?	- ?	- ?
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.	+ ?	+ ?	+ ?
20 To manage the landscape effects of development in recognition of European Landscape Convention.	- ?	- ?	-
21 To enhance, conserve and protect buildings, sites, and the setting of historic assets to the urban environment as part of development projects.	- ?	- ?	-
22 To reduce annual CO2 emissions by 60% from 1990 levels, by 2050 (36% by 2026).	0 ?	0 ?	0 ?

23 To deliver a built environment that is well adapted to cope with the changing weather conditions that are forecast.	0	0	0
24 Incorporate measures into development proposals that contribute towards a reduction in flood risk aimed at providing a runoff rate less than greenfield rates.	0	0	0

- 4.27 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 of the options would help to meet the objectively assessed 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. Option 3 was 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. It was also considered more likely to have a greater positive effect against SA Objectives relating to sustainable transport and the provision of facilities/services.
- 4.28 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 greater levels of commuting should the delivery of new homes and jobs become unbalanced. 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 of 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.
- 4.29 The available evidence indicates that there are existing and future constraints with regard to water resources as well as waste water infrastructure. At this stage, it is considered that Option 3 has the potential for a greater negative effect on water resources compared to the other Options given the higher level of proposed growth. The significance of the negative effect reduces as the level of growth decreases.
- 4.30 While there were no significant differences identified between the Options against SA Objectives relating to biodiversity, the landscape and the historic environment - as this is dependent on the precise location of development, it was considered that the potential significance of negative effects increases alongside the level of proposed growth.

- 4.31 Table 4.4 provides an outline of the reasons for selection/rejection of alternatives for the level of growth where relevant. It should be noted that whilst the IA findings are considered by the Council in its selection of options and form part of the evidence supporting the Local Plan, the IA findings are not the sole basis for a decision; other factors, including planning and deliverability, play a key role in the decision-making process.

Table 4.5: Summary of Approach to Alternatives Assessment and Selection for Growth Options

Strategic Options Considered and Appraised	Reasons for Progressing or Rejecting the Option in Plan Making
Option 1: 11,250 dwellings	This option would allow the Council to meet its housing need in full, based on the available evidence. However, the Council rejects this option because it does not support the wider policy objectives of the plan relating to growth and the role of Telford within the Marches LEP area.
Option 2: 15,000 to 16,000 dwellings	This option would promote growth at a level that is 50% above the assessed housing need for the borough up to 2031. It would also lead to a significant boost in the supply of housing land during the plan period. The notional annual rate of 750 dwellings per year would broadly reflect the long term average. There are risks attached to this scale of growth, not least the potential over-supply of housing land that is left undeveloped due to a lack of effective demand, or an imbalance in the available labour supply and the number of jobs leading to greater levels of commuting, putting undue pressure on the available transport infrastructure without the funding being available to make the necessary improvements. However, on balance, this option is considered to be the most appropriate taking into account the overall plan objectives of supporting the delivery of affordable housing, protecting and enhancing of borough's green infrastructure, and promoting the wider role and function of Telford within the sub-region.
Option 3: 20,000 dwellings	This option would promote a scale of growth almost double the level of assessed need, based on available evidence. Whilst this could, potentially, lead to a significant boost in supply there is greater uncertainty that this level of development would actually occur, given the level of supply already committed and viability issues that already impact on housing delivery locally. Promoting this option through the plan could undermine the plan strategy of focusing development on the major urban areas and could lead to, potentially, an over-supply of land that would further impact on the viability of development land in the pipeline. The notional annual rate of development (over 1,000 dwellings per year, each year, up to 2031) would far exceed recent and longer term trends in delivery. Therefore, for reasons stated here, this option is rejected.

- 4.32 It should be noted that the level of employment growth is intrinsically linked to the overall level of housing growth proposed. Housing and employment growth needs to be balanced to ensure that the right level of homes and jobs

are provided during the life of the plan. The level of employment growth is linked to the amount of homes that are delivered. Without the jobs, people will not move to the homes and therefore they will not be built, without the homes for the workers business will not locate here. Using population projections from the Objectively Assessed Housing Needs study, a common figure has been arrived at.

Options for the Spatial Distribution of Growth

- 4.33 The Shaping Places Strategy & Options Document published in June 2013 proposed three reasonable options for the spatial distribution of housing and employment, which are set out in the table below:

Table 4.6: Shaping Places Strategy & Options Spatial Distribution Options (2013)

Option	Strategic Area Distribution		
	Urban	Urban Fringe	Rural
Option 1: Dispersed Development	High % of development	High % of development	Medium % of development
Option 1 is strongly market led and involves a dispersed pattern of development across urban, urban fringe and rural areas. Whilst it provides the greatest choice for development particularly by allocating a high proportion of development on the urban fringe as urban extensions, it risks placing housing in locations which may reduce its ability to support regeneration or help sustain existing services and could involve extensive new infrastructure. This option proposes a higher level of growth in rural areas compared to the other two options.			
Option 2: Urban Concentration	Very High % of development	Low % of development	Low % of development
Option 2 concentrates housing in the Telford urban area and restricts development in the urban fringe to one sustainable urban extension where there are links to the Donnington Targeted Intervention Area and the Ministry Of Defence. The option includes the development of one previously developed site in the rural area and to conform with paragraph 55 of the <i>National Planning Policy Framework</i> in respect of promoting sustainable rural development where it will enhance or maintain the vitality of rural communities.			
Option 3: Growth Hub	High % of development	Medium % of development	Low % of development
Option 3 provides a managed approach offering choice to the market that uses development to deliver local priorities and maximise growth opportunities. It continues to pursue strong housing growth within the urban area in recognition of the regeneration benefits of this location and it recognises and responds to the development market's interest to develop within the urban fringe. This option proposes a slightly higher level of growth in the rural area, compared to Option 2.			

- 4.34 All of the options involve a high number of dwellings in the urban area in recognition that almost all of the committed housing development is already located within this area, particularly Telford.
- 4.35 The responses received in relation to the Shaping Places Strategy & Options Document were broadly supportive of Option 3 (Low Rural/Medium Fringe/High Urban) followed by Option 2 (Low Rural/Low fringe/Very High

Urban)⁹⁴. Some respondents challenged the delivery of existing commitments, highlighting the need to consider Strategic Housing Land Availability Assessment (SHLAA) sites to meet targets, including previous target shortfalls. Concern was expressed by some communities potentially affected from development in the urban fringe, in particular, Eyton and Wappenshall. The reps considered that careful consideration was needed to phasing of development, ensuring that the Plan's objectives are achieved through development in urban/rural areas rather than too much development in the Fringe which is favoured by the market.

- 4.36 The three reasonable spatial distribution options were appraised by the Council against the SA Framework with the findings presented in the Shaping Places Strategy & Options SA Report (June 2013)⁹⁵ which accompanied the Shaping Places Strategy & Options Document on public consultation from 10th June to 26th July 2013. The summary findings of the SA for the three options are presented below with the detailed appraisals provided in Appendix IV.

Table 4.7: Summary of SA Findings for Shaping Places Strategy & Options Spatial Distribution Options (2013)

SA Theme & Remedial Measures	Option 1 - Dispersed Development	Option 2 - Urban Concentration	Option 3- Growth Hub
	SA Summary		
Sustainable Economic Development	This option provides the greatest variety of location (and type) regarding housing i.e. satisfying a full range of provision from affordable to luxury. In doing so it supports economic development in the Borough.	This spatial option was found to be potentially significantly negative for ensuring an appropriate provision of employment land and accommodation. It is recommended that the spatial option sets out the distribution of employment requirements. The spatial option was found to be major positive for locating housing close to employment and other services and facilities. Housing, particularly that focused in the urban area, is considered to	The proposed spatial option was found to be potentially significantly negative for ensuring an appropriate provision of employment land and accommodation. It is recommended that the spatial option sets out the distribution of employment requirements. The spatial option was found to be major positive for locating housing close to employment and other services and facilities. Housing, particularly that focused in the urban area, is considered to

⁹⁴ Telford & Wrekin Council (Dec 2013) Summary of comments received as part of the Strategy & Options consultation. Available online: http://www.telford.gov.uk/downloads/file/1395/shaping_places_local_plan_strategy_and_options_summary_of_comments_december_2013

⁹⁵ Telford & Wrekin Council (2013) Shaping Places Strategy & Options SA Report. Available online: http://telford-consult.objective.co.uk/portal/shaping_places/shaping_places_local_plan/shaping_places_strategy_options?pointId=2476452

		be a sustainable proposal.	be a sustainable proposal.
Resource Management and Material Assets	The objectives that are relevant indicate a minor sustainable benefit - largely because a reasonable provision of housing is still located in the urban area.	Several of the objectives relate to policy as opposed to spatial planning matters. This spatial option does, positively help support community and sustainable transport provision.	For three out of the five objectives, the appraisal relates to policy as opposed to spatial planning matters. The spatial option does, however, help support community and sustainable transport provision and therefore responds positively to two out of the five objectives.
Sustainable Communities	This option tends to have a negative potential impact upon sustainable communities because it allocates considerable development in less accessible areas.	Several objectives relate to more site specific/policy matters that are not applicable to the spatial option. The objectives that are applicable, however, score moderately positive for supporting for example sustainable transport, local health facilities etc.	Three out of the six objectives relate to more site specific/policy matters that are not applicable to the spatial option. The three objectives that are applicable, however, score moderately positive for supporting for example sustainable transport, local health facilities etc. It is recommended that these matters are taken into careful consideration during subsequent stages of spatial planning and policy writing.
Environmental Sustainability	Of the objectives that are relevant, one indicates a negative potential impact upon carbon saving as the distribution is less focused upon the urban area. For example, it could encourage greater car use and less exercise - leading to greater levels of poor health such as obesity.	The objectives that are relevant indicate that this is a minor positive sustainable option particularly as close proximity to services can reduce the need to travel by car and the options involves the re-use of urban land rather than building out into new areas.	Of the objectives that are relevant to the spatial scale this option has mostly positive sustainable implications, particularly in its ability to protect and enhance green infrastructure.
Mitigation Measures	This option scored poorly in respect of placing housing in less accessible locations	Scope for further improvement by making more explicit	Scope for further improvement by making more explicit links with sustainable

	which encourages less sustainable movement patterns. Strong sustainable urban design policy would be required to make the detail design of developments as sustainable as possible.	links with sustainable design.	design. As the options begin to explore more area specific locations - this will require greater scrutiny of the merits of different locations for example urban extensions will require controls on size and location and detail in design to make them more sustainable.
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4.37 The Council's view set out in the Shaping Places Strategy & Options Document (2013) was that Option 3 was the most appropriate to best meet with the objectives for the plan, for the following reasons:

- It best reflects the ambition of the council and the community for managed growth
- It is responsive to market demand
- It provides greatest choice and opportunity both for development and home buyers
- It recognises the regeneration benefits associated with urban locations
- It enables housing development to support the Targeted Intervention Areas
- It recognises the sustainable value of urban locations
- It provides for a generous amount of development in the rural area in response to sites of previously developed land
- It supports rural communities

4.38 There have been a number of changes to the overall level of growth proposed in the Local Plan since the publication of the Shaping Places Strategy & Options Document in June 2013 as a result of updated evidence and further technical work on objectively assessed needs. The Local Plan now proposes around 15,555 new dwellings during the life of the Plan, which is a significant reduction from the previously preferred 26,500 new dwellings proposed in the Shaping Places Strategy & Options Document (2013). At this stage, it is important to consider whether the reduction in the overall level of growth gives rise to any new reasonable options for spatial distribution or significantly affects the reasonable options previously considered through plan-making and the SA at the Strategy & Options stage in 2013.

4.39 The general principles for the location of development have not changed since 2013, housing and employment can potentially be located in three strategic areas in the Borough; urban, urban fringe and rural. The justification for locating housing and employment development in these areas, previously set out in Para 5.2.10 of the Shaping Places Strategy & Options Document

(2013), is still sound. The Local Plan proposes to locate development in these areas because:

- It maximises the ability to achieve all proposed aims and objectives within the Plan;
- it enables the Council to harness the different opportunities provided by each area;
- it enables the Council to adopt a more proactive and positive approach to development given the broader range of locational options available;
- it provides a wider choice of sites and therefore the opportunity to avoid areas with technical and designated site constraints;
- it enables the Plan to be more responsive to land availability viability.

- 4.40 It is important to note that as in 2013, there is still a generous amount of land available for development⁹⁶; therefore, the challenge for the Council is not in finding land but in the choices that must be made in deciding not only where housing might be located but also the amount of housing in those locations. It is also important to highlight that there are still a high number of committed developments within the urban areas of the Borough, particularly Telford.
- 4.41 While the precise housing numbers may have changed in terms of their distribution between the strategic areas, given the reduction in the overall level of housing growth, the underlying percentage distribution (High, Medium, Low) that form the basis of the reasonable options presented in Table 4.5 has not. Taking the above into account, the Council considers that there are still only three reasonable options for spatial distribution of development and that these alternatives have already been considered through plan-making and the SA process.
- 4.42 The Local Plan still progresses Option 3 (Growth Hub) as the preferred option, proposing a high percentage of growth within the urban area, medium percentage in the urban fringe and low percentage in the rural area. Given that there have been no significant changes in terms of reasonable options for spatial development, or the preferred option being progressed through the Plan, it is considered that the SA of reasonable alternatives presented in Appendix IV is still valid.
- 4.43 Table 4.7 provides an outline of the reasons for selection/rejection of reasonable alternatives for the spatial distribution of growth where relevant. It should be noted that whilst the IA findings are considered by the Council in its selection of options and form part of the evidence supporting the Local Plan, the IA findings are not the sole basis for a decision; other factors, including planning and deliverability and consultee representations, play a key role in the decision-making process.

⁹⁶ Telford & Wrekin (2012) Strategic Housing Land Availability Assessment.

Table 4.8: Summary of Approach to Alternatives Assessment and Selection for Spatial Distribution Options

Strategic Options Considered and Appraised	Reasons for Progressing or Rejecting the Option in Plan Making
Option 1: Dispersed Development	This option has been rejected because development dispersed across the District would not be sustainable development that is close to facilities/services and employment opportunities. This option would result in people needing to travel further and longer to reach these facilities/services and jobs and could potentially compromise the rural character. This option would also not help to meet the housing and employment needs of Telford.
Option 2: Urban Concentration	This option has been rejected because, whilst the overall objective of directing the vast majority of development towards the principal urban area (Telford) maybe the most sustainable option, it does not respond to the deliverability issues relating to the development of previously-developed sites that is recognised in the Telford.
Option 3: Growth Hub	This option was selected as the most appropriate option that would deliver the plan strategy and vision in a balanced, sustainable manner, whilst recognising the risks in pursuing other strategic options that were based either on dispersal or intensification.

Options for Policies

- 4.44 The Shaping Places Strategy & Options Document (2013) proposed a number of policy issues and options to assist in the preparation of the Local Plan. Key choices were identified and set out as options. Where possible, reasonable alternatives were suggested for some of the proposed options. Each reasonable option was appraised by the Council against the SA Framework with the summary findings presented in the Shaping Places Strategy & Options SA Report (June 2013)⁹⁷ which accompanied the Shaping Places Strategy & Options Document on public consultation from 10th June to 26th July 2013. The detailed appraisals for each of the options and alternatives are provided in Appendix IV of this Report. It should be noted that a number of proposed options were not subject to SA as the Council considered that they represented a default position that would carry forward and implement national planning policy and were therefore not reasonable.
- 4.45 Table 4.8 provides an outline of the reasons for selection/rejection of reasonable alternatives for policies where relevant. It should be noted that whilst the IA findings are considered by the Council in its selection of options

⁹⁷ Telford & Wrekin Council (2013) Shaping Places Strategy & Options SA Report. Available online: http://telford-consult.objective.co.uk/portal/shaping_places/shaping_places_local_plan/shaping_places_strategy_options?pointId=2476452

and form part of the evidence supporting the Local Plan, the IA findings are not the sole basis for a decision; other factors, including planning and deliverability and consultation, play a key role in the decision-making process.

Table 4.9: Summary of Approach to Alternatives Assessment and Selection for Policy Options

Strategic Options Considered and Appraised	Reasons for Progressing or Rejecting the Option in Plan Making
Option 1: Attracting and Supporting Business Growth	
Set out a policy approach to secure economic growth through attracting new types of businesses to diversify the economy, whilst also supporting the long term success and growth of existing business sectors	This option has been progressed through the site allocations and the choice of site allocations.
Focus on our existing strengths by prioritising the growth and development of our existing traditional large scale manufacturing and production businesses, including protecting sites for these industries	This has been taken forward with the majority of the sites allocated being within the existing employment areas.
Option 2: Locating Economic Development in Telford	
Prioritise development within the established employment parks and industrial areas of Donnington Wood, Hadley Park, Halesfield, and Hortonwood	This has been taken forward with the majority of the sites allocated being within the existing employment areas.
Identify opportunities for economic development within or close to existing or new centres and Targeted Intervention Areas	There have been no sites identified within the TIAs for employment development. However employment sites on existing areas in close proximity have been selected.
Apply general criteria instead of identifying priority areas for employment development	As well as allocations for employment development, a criteria policy has been placed for development on unallocated sites.
Option 3: Locating Economic Development in Newport	
Identify an additional 4 hectares of land for employment development within or adjoining Newport	An employment allocation has been identified to the south of Newport for over 9 ha.
Apply general criteria for economic development in Newport	As well as allocations for employment development, a criteria policy has been placed for development on unallocated sites.
Option 4: Locating Economic Development in the Rural Area	
Prioritise economic development on the larger brownfield sites'	The rural area has a specific policy which addresses employment development in the rural area. The criteria within the policy sets a preference for the reuse of land.
Continue the current strategy of prioritising new development within or adjoining key rural villages	The rural area has a specific policy which addresses employment development in the rural area. The criteria within here asks that development supports existing communities.

Apply general criteria for employment development in the rural area	The rural area has a specific policy which addresses employment development in the rural area by setting criteria for its delivery.
Option 5: Housing Mix	
Set out a policy to apply to all large housing development sites across the borough requiring a specified mix of: different types of housing sizes of housing unit and tenure of affordable housing	This option has been selected, in part, under Policy HO4. The option to include a detailed specification of dwellings has been rejected as this is considered too prescriptive and inflexible.
Option 6: Percentage targets for affordable housing	
Option a) Set separate affordable housing targets for Telford, Newport and the rural area. These would apply to qualifying sites at levels advised by local viability evidence (currently 20% in Telford, 35% in Newport and 40% in the rural area).	This option has been selected under Policy HO5, but the policy includes slightly higher percentages in light of recent improvements in performance in delivery of affordable housing, and would provide sufficient flexibility to allow for changing circumstances. In addition, the option to include separate targets for the three sub-areas was supported at Strategy and Options stage.
Option b) Alternative option might be to set targets for each of the 3 areas at lower levels than current local viability evidence suggests could potentially be achieved;	This option has been rejected because it does not support the overall plan strategy for housing, and would run counter to recent trends in delivery of affordable housing in the borough.
Option c) Alternative option might be to set a single borough-wide target (as advised by current local viability evidence this should be at 20%);	This option has been rejected because it does not reflect the variance in affordability across the borough, as evidenced in the latest SHMA (2014).
Option d) Alternative option might be to set a greater variety of targets in relation to locations.	This option was rejected has been rejected because it is considered to be too mechanistic and overly prescriptive.
Option 7: Affordable housing thresholds	
Option a) set a borough-wide threshold of 15 units or 0.5 hectares and above for residential sites to provide a proportion of affordable housing	This option has been selected, in part under Policy HO6, but now reflects more recent national planning policy requirements on affordable housing contributions.
Option b) set separate lower thresholds for Telford, Newport and the rural area	This option has been rejected as it is no longer a reasonable option in light of more national planning policy requirements on affordable housing thresholds.
Option c) seek affordable housing provision or a contribution in lieu of on-site provision on all residential developments irrespective of size	This option has been rejected as it considered contrary to paragraph 50 of the NPPF.
Option d) set a single lower threshold borough wide	This option has been rejected as it is no longer a reasonable option in light of more national planning policy requirements on affordable housing thresholds.

Option 8: On-site or off-site provision of affordable housing	
Option a) set out a policy to require that on qualifying sites affordable housing should be provided on the application site as part of the overall scheme following the approach set out above and to state a preference for a lower level of on-site affordable housing or an alternative dwelling mix, prior to considering developer contributions for off-site provision	This option to presume on-site contributions has been selected and taken forward under Policy HO6 of the draft local plan.
Option b) an alternative approach would be to take a more favourable approach to either off-site provision or financial contributions in lieu of provision. This could potentially involve having criteria related to factors such as viability and the surrounding housing mix	This option has been rejected as it considered contrary to paragraph 50 of the NPPF.
Option 9: Rural Housing	
Set out a rural exceptions policy to: <ul style="list-style-type: none"> • allow for cross subsidy development with market housing to support an affordable element; • on the basis of need, allow a larger number of dwellings than currently permitted; • widen the range of settlements in which such development is permitted. 	The option for a rural exceptions policy has been selected and taken forward under Policy HO11 of the Local Plan. The policy reflects, but not seek to repeat, national guidance. In addition, the settlement strategy for the rural area is covered under Policy HO10.
An alternative option would be to continue the existing policy approach for 100% affordable rural housing exceptions.	This option has been selected and incorporated into Policy HO11.
Option 10: Specialist Housing	
Option a) to require a proportion of new residential development to be lifetime homes compliant	The option has been selected, and is covered in more general terms under Policy HO4 of the Local Plan.
Option b) to encourage provision of specialist housing appropriate for the differing needs of older people	This option has been selected and is covered under Policy HO7 of the draft local plan.
Option c) and to encourage provision of specialist housing appropriate for the needs of people with a range of disabilities.	This option has been selected and is covered under Policy HO7 of the Local Plan.
Option 11: Gypsy & Travellers	
Allocate sites to provide additional permanent pitches and transit provision along with a policy setting out criteria for assessing other traveller site proposals coming forward.	Since the consultation on this option new evidence has been prepared (GTAA, 2014) which identified the specific need for G&T up to 2031. Additional pitches have been provided to address part of the short term (2014-19) need. A small residual number of pitches (four) are still needed up to 2019. The Council may, if necessary, prepare a Gypsy and Travellers Sites Allocations Development Plan Document to address local identified

	needs to address the immediate shortfall. The draft plan includes a number of policy criteria, under Policy HO8 and HO9 of the Local Plan, to assist in identifying appropriate sites to meet future needs. Consequently, this option has been selected and taken forward in part.
An alternative option would be to include further criteria in the policy.	This option has been selected and taken forward, under Policy HO9 of the Local Plan, in light of the updated evidence base on need for G&T pitches up to 2031 and the additional supply currently identified.
Option 12: Area Travel Plans	
Develop a policy that requires large-scale strategic developments and developments in Telford town centre to prepare an Area Travel Plan.	This option has been adopted and taken forward into the Local Plan under Policy C1. This policy supports the NPPF (S.36) and is locally distinctive in seeking area wide travel plans
Option 13: Accessibility and Public Transport	
Develop a policy ensuring all new development is accessible by public transport and contributes to the borough's wider aims and objectives for improving accessibility.	This option has been adopted and taken forward into the Local Plan under Policy C1.
Option 14: Rail	
Develop a policy improving access to rail facilities and supporting business usage of rail facilities.	This option has been adopted and taken forward into the Local Plan under Policy C1. This only covers passenger rail stations.
An alternative approach would be to have no specific policy regarding these facilities and rely solely on national policy when assessing development proposals.	There are no allocations for additional freight rail facilities in the plan.
Option 15: Walking and Cycling	
Set out a policy approach that promotes and enhances facilities and infrastructure to enable walking, cycling and other forms of non-motorised transport?	This option has been adopted and taken forward into the Local Plan under Policy C1.
Option 16: Parking	
Setting maximum parking standards	This option was not pursued as it was felt to be inflexible, not reflective of the local area or guidance set out in the NPPF.
Adopting more flexible approaches based on location	The council have adopted a flexible approach based on local development scenarios including central, urban and suburban.
Option 17 Road Network	
Set out a policy approach which requires the effects of development on the road network to be taken into account and delivered through new development and via contributions from developers.	This option has been adopted and taken forward into the Local Plan under Policy C3.
Option 18: Green Infrastructure	

<p>Set out a policy to require green infrastructure on all developments. The green infrastructure requirements criteria will be informed by;</p> <ul style="list-style-type: none"> • Information about the assessment process (for establishing the appropriate type, amount and distribution of green infrastructure in an area or site) • the <i>Local Green Infrastructure Needs Study</i> standards including sports, recreation and leisure provision • the Green Infrastructure of Strategic Significance including ecological and landscape • designations / protection • the <i>Green Infrastructure Framework Evidence & Analysis Document</i> • Information about when, where and how green infrastructure planning is used in the planning process • instruction and guidance regarding non-green infrastructure ancillary provision, exceptions, management, funding and viability 	<p>The option to promote green infrastructure has been selected and carried forward under section 6 'Natural Environment' of the Local Plan. Policies NE3, NE4, NE5 and NE6 support development which promotes, protects and enhances green infrastructure. Policy NE5 provides guidance on the management and maintenance of public open space. The policies reflect, but not seek to repeat, national guidance.</p>
Option 19: Hierarchy of Centres	
<p>Continue supporting retail development in the existing retail hierarchy of Telford Town Centre, Newport and Dawley, Donnington, Hadley, Madeley, Ironbridge, Lawley, Oakengates, and Wellington.</p>	<p>This option has been rejected however the policy option selected still seeks to encourage and support retail development in these named centres.</p>
<p>Or propose a new retail hierarchy including new centres and locations, supported by new evidence.</p>	<p>Evidence contained in the Telford and Wrekin Retail and Leisure Capacity study supports a new retail hierarchy. This is covered under policy EC1 of the Local Plan.</p>
Option 20: Telford Town Centre	
<p>Continue with the strategy for expanding the Town Centre as set out in the Central Telford Area Action Plan.</p>	<p>This option has been selected, in line with the NPPF and is supported by evidence contained within the Telford and Wrekin Retail and Leisure Study. It is covered under policy EC6.</p>
Option 21: Leisure and the evening and night-time economy	
<p>Include policies to protect and promote non-retail facilities, such as for leisure and the evening and night-time economy, in identified Town and District Centres.</p>	<p>This option has been taken forward and is shown in policies in Local Plan Policies EC1, EC2, EC4 and EC5. This option has been chosen to ensure such development is focussed within the primary and secondary frontage areas. It has also been chosen to prevent the loss of fundamental services/facilities in rural villages.</p>
<p>An alternative approach would be to have no specific policy regarding these facilities and rely solely on the <i>National Planning Policy Framework</i> when assessing development proposals.</p>	<p>This option has been rejected to ensure development can be controlled in line with local circumstances.</p>

Option 22: Offices	
Beyond defined centres strictly apply the sequential test to office use	This option has been selected as advised in the Telford and Wrekin Retail and Leisure Capacity Study, this is covered in policy EC8
Be more flexible to secure investment in available and accessible locations	This option has been rejected as it is not wholly compliant with the Town Centre first approach in the NPPF.
Option 23: Telecommunications and Broadband	
To set out a policy to help guide the siting and design of new telecommunications development and promote high quality broadband development that links to the existing <i>Telecommunications Supplementary Planning Document?</i>	This option has been progressed. Rather than link with the SPD the policy will supersede this with the detail contained within the local plan.
An alternative approach would be to have no specific local policy regarding telecommunications development and rely solely on the <i>National Planning Policy Framework</i> when assessing development proposals.	This option has not been taken forward as it was considered that the plan required a policy to aid deliver of improvements to the communication networks.
Option 24: Tourism	
Prioritise the growth and development of our existing major tourism assets such as the Ironbridge Gorge, The Wrekin and Telford Town Park for leisure tourism, and Southwater/Telford International Centre for business tourism	Policies within the Local Plan seek to better connect these areas. The policies also set criteria for where development should be based. Where appropriate this is within and around existing tourism assets and other centres throughout Telford & Wrekin.
Prioritise the growth and development of tourism in other parts of the borough that are currently less well developed for the visitor economy, including Madeley, Newport, Wellington and rural villages	This option has been taken forward in part. The criteria for the delivery of tourism development ensures that development is included within the boroughs centres, such as Madeley, Newport and Wellington where it is sustainable. However within the rural area however, development will only be considered where appropriate and accessible.
An alternative approach would be to have no local policies for the future development of business and leisure tourism and rely solely on the National Planning Policy Framework when assessing development proposals	This option has not been taken forward as it is considered necessary to direct development into the appropriate areas in order for tourism to thrive in the area.
Option 25: Culture	
Include policies to protect existing arts, culture, faith and leisure facilities, continuing to provide opportunities for cultural expression, with particular focus on building capacity in new communities and areas of growth.	This option has been selected as the Local Plan has included policies to preserve existing and promote new social and cultural facilities
An alternative approach would be to have no local policies regarding these facilities and rely solely on the National	This option has been rejected as it is considered necessary to follow a local approach to protect and enhance social and cultural facilities.

Planning Policy Framework when assessing development proposals.	
Option 26: Sustainable Construction	
Set out a policy requiring residential and commercial developments over a size threshold across the borough to comply with targets relating to Code for Sustainable Homes and BREEAM.	The size threshold approach is not taken forward as the Council aims all development to comply with high energy efficiency standards in line with the Government's zero carbon standards.
An alternative approach would be to introduce varied targets reflecting the impact on scheme viability of the scale location or characteristics of the proposal, or to have no policy approach.	This approach is taken forward as proposals affecting a building of traditional construction are under circumstances exempted from the energy efficiency standards.
Option 27: Renewable and low carbon energy	
Set out a criteria-based policy for determining planning applications for the renewable energy and low carbon sector	Renewable energy applications have to comply with the policies in the Local Plan and national guidance. More strict criteria were not considered to be needed in light of the Council's supportive strategy and the recent stricter Government approach regarding wind turbines.
Or, in addition to this criteria-based approach, identify broad areas of opportunity or specific locations for the renewable energy and low carbon sector.	This approach is not taken forward as the Council encourages communities to propose locations for renewable energy in Neighbourhood Development Plans.
Option 28: New Waste Capacity	
Detailed criteria to apply to the location of new or enhanced waste management facilities;` and	Location criteria for waste management sites is picked up through policy ER9. The policy directs general waste management facilities towards key industrial estates in recognition of the increased use of clean technology. An exception in the policy is the need specialised facilities which will be dealt with on a case by case basis.
Detailed criteria to apply to the siting, design and operation of proposed developments as set out above.	Criteria is included within the Reasoned Justification text which deals with the operation of facilities.
Option 29: Flood Risk	
Set out a flood risk management policy in line with the findings of the <i>Strategic Flood Risk Assessments 1 & 2</i> , and to comply with the <i>Local Flood Risk Management Strategy</i> .	This option has been progressed through Policy ER14 in the Local Plan, which covers flood risk,
Option 30: Sustainable Drainage Systems	
Develop a SuDS Approval Board policy requiring that development comply with criteria regarding incorporation of SuDS.	This option has been progressed through Policy ER14 in the Local Plan, which covers sustainable drainage.
Option 31: Water supply and sewerage facilities	
Set out a policy ensuring development location and phasing are in keeping with the strategy recommended in the Water Cycle Studies	This option has been progressed through Policy ER13 in the Local Plan, which covers sewerage and water supply infrastructure.
Option 32: Sand and Gravel	

Do not allocate sand and gravel sites in the Local Plan, with the presumption that the required landbank will be met by sites located within Shropshire.	This option has been selected because there is no need for the plan to identify additional sand and gravel resources since Shropshire Council have indicated that the sub regional apportionment for sand and gravel is likely to be fully met up to 2031 by sites within Shropshire.
An alternative option would be to further explore the potential for allocating sites and seek to identify deliverable sites within Telford and Wrekin.	This option has been rejected as the NPPF requires a supply of 7 years and there is sufficient supply up until 2031.
Option 33: Crushed Rock	
Based on the evidence above it is proposed that the need for crushed rock will be met solely by Leaton Quarry, with no further sites allocated. Duty to cooperate discussions will be held with Shropshire Council and a formal agreement regarding the required landbank will be drawn up.	This option has been selected by reason of sufficient supply and is covered in policy ER3.
An alternative option would be to further explore the potential for allocating sites and seek to identify deliverable sites within Telford and Wrekin.	This option has been rejected as evidence suggests no need for additional sites over the plan period.
Option 34: Mineral Extraction and impacts on the Environment	
Set out policies which set out environmental criteria, to ensure that permitted operations do not have unacceptable adverse impacts.	The NPPF requires local authorities in their plans to set out environmental criteria in line with the framework. This option has been selected and is covered under policy ER6. The policy reflects, by not seeks to repeat national guidance.
An alternative policy approach could be, as there is no major mineral extraction anticipated, rely on national policy and have no local policies regarding adverse impact.	This option has been rejectedso that control is placed on the future extraction of all types of minerals i.e. new energy.
Option 35: Minerals Safeguarding Areas	
In line with the National Planning Policy Framework the Council intends to adopt policies to ensure Mineral Safeguarding Areas and existing, planned or potential transport routes are not sterilised by non-mineral development.	In line with the NPPF this option has been selected and is covered under policy ER2.
Option 36: Pollution	
Set out a policy with locally specific criteria regarding development and pollution	This option has been rejected as there are no locally specific issues in the borough not covered by a general policy approach.
An alternative would be to set a simple policy that ensures development does not have an adverse impact on noise and air quality, or to simply rely on national planning policy along with guidance given within other Acts.	This option has been selected as it is up to developers to demonstrate they not adversely impact on new and existing development.
Option 37: Land Stability	

Set out a policy approach to development in an area known to be affected by land stability issues.	This option has been selected as due to the mining history and other land stability issues in the borough a policy approach to protect development is needed.
An alternative approach would be to have no local policies regarding land stability issues and rely solely on the National Planning Policy Framework when assessing development proposals.	This option has been rejected as there are land stability issues in the borough that requires a locally specific policy approach.
Option 38: Listed Buildings	
The Council could set out locally specific policy guidelines for works to listed buildings to ensure development does not have a detrimental effect on the special interest of the listed building and its setting.	The Council seeks not to repeat national policy instead it wants to be more specific in what the NPPF intends. Draft Local Plan Policies BE 4 and BE 6 emphasises that the materials and setting should be protected, conserved and enhanced in order not to impact on the character of a listed building.
An alternative approach would be to have no local policies and rely solely on the National Planning Policy Framework when assessing development proposals.	This option has been rejected, whilst the NPPF acknowledges the value of listed buildings it does not specify how they should be retained and the how they can contribute to the setting of an area.
Option 39: Conservation Areas	
The Council could set out policies which give locally specific guidelines, in line with the management proposals	This option has been progressed through Local Plan Policy BE 5, which relates to Conservation Areas. The policy refers to how planning applications should be submitted by stating that a design and access statement should be included. Locally specific guidelines encourages original materials, the removal of modern additions and discourages development that can impair the setting of the Conservation Area.
An alternative approach would be to have no local policies and rely solely on the <i>National Planning Policy Framework</i> when assessing development proposals.	This option has been rejected as the NPPF has a broad approach in how to manage Conservation Areas and seeks for Local Authorities to justify a Conservation Area's status through analysing the area's historic or architectural interest. Through assessing a potential Conservation Area the Council should develop policy for managing this heritage asset.
Option 40: Ironbridge Gorge World Heritage Site	
Set out a policy stating that the World Heritage Site will be preserved and enhanced by ensuring that only development which is appropriate for this setting is allowed and that development proposals that address management of visitors and access, land instability issues and the management of the river and its bank are encouraged.	This option has been progressed to reflect the importance and global significance of the World Heritage site.

Or the Council could have no local policies and rely solely on the <i>National Planning Policy Framework</i> when assessing development proposals.	This opinion has been rejected even though the NPPF supports the protection of World Heritage Sites, however it does not go into specifics into how these sites should be managed. The Council is in the process of creating Ironbridge Gorge World Heritage Site management plan which seeks to provide guidance on how development should take place within the World Heritage Site.
Option 41, 42 & 43: Urban Design	
Provide urban design policies within each section and policy area in the Local Plan.	This option has been selected, with Local Plan Policies with design implications in the associated sections, together with one general objective based urban design policy.
Provide a number of urban design policies in one section covering all subjects, such as green infrastructure, housing and heritage.	This option has been rejected as a general urban design policy referring to specific design policies in the associated sections is preferred.
<p>Provide two primary urban design policies supported by a comprehensive supplementary planning document produced in parallel with the Local Plan:</p> <ul style="list-style-type: none"> • policy 1: aims, objectives and obligations • policy 2: general criteria <p>The supplementary planning document would contain:</p> <ul style="list-style-type: none"> • direct links to the urban design policy • information related to an assessment of local character, which is currently under production • when, where and how urban design is used in the planning process • detail information regarding principles, criteria and standards • detail information regarding the all key topic areas 	This option has been rejected as an SPD was not considered to be needed at this time to set out the urban design strategy.

Options for Site Allocations

- 4.46 The Council carried out a Strategic Housing Land Availability Assessment (SHLAA) in 2012⁹⁸ to identify sites with housing potential. The SHLAA made an assessment of the sites deliverability, and of how many dwellings could potentially come forward and when. It identified over 600 sites of which 160 were considered to be deliverable and capable of accommodating housing development. During 2012, an Employment Land Review was also carried

⁹⁸ Telford & Wrekin Council (2012) Strategic Housing Land Availability Assessment. Available online: http://www.telford.gov.uk/info/20172/planning_policy_and_strategy/126/strategic_housing_land_availability_assessment_shlaa

out. Its purpose was to identify a range of sites suitable for employment development up to 2031.

- 4.47 The Shaping Places Strategy & Options Document published in for consultation in June 2013 set out a number of options for the overall level and distribution of housing and employment growth as well as policies. It is important to note that this document did not propose any specific sites options for development. Following consultation on the Strategy & Options Document the Employment Land Review was updated again in 2014, to take account of planning consents.
- 4.48 A number of potential site options were then presented by the Council in the Proposed Housing and Employment Sites (PHES) Document, which published for consultation in May 2014. Proposed sites were selected on the basis of their site specific and strategic benefits:
- **Site specific benefits** referred to those site features which were viewed to make a site more favourable for development (and potentially more viable) e.g. proximity to services and/or the absence of geotechnical problems.
 - **Strategic benefits** referred to the degree to which a site supported the delivery of the Shaping Places Local Plan strategic aims and objectives.
- 4.49 Following consultation the PHES Document, the Council commissioned Peter Brett Associates LLP to undertake a Strategic Housing Land Availability Assessment (SHLAA) Viability Study⁹⁹. The purpose of the study was to undertake a more comprehensive and detailed 'achievability' assessment of the sites identified in the 2012 SHLAA and to support and where necessary update the findings of the previous assessment. The study concluded that around 59% (approximately 409) of the 693 potential sites identified in the 2012 SHLAA are theoretically viable or marginally viable.
- 4.50 Informed by the further evidence on the Council identified 421 reasonable housing site options that warranted further consideration through the site selection process and should therefore be subject to IA.
- 4.51 The Employment Land Review (2012) identified 66 potential employment site options. The 66 employment site options were then assessed by the Council against a set of employment criteria which resulted in 46 potential employment site options being proposed through the PHES Document. A further 2 employment sites were proposed during the consultation on the PHES Doc. The Council considered that the 66 options identified through the Employment Land Review and 2 additional site options proposed through consultation should be considered through the IA process.
- 4.52 Enfusion (specialists in sustainability and environmental assessment) was commissioned in January 2015 to assist the Council to progress the IA process for the Local Plan. Enfusion undertook an independent comparative appraisal of reasonable housing and employment site options identified by the Council against the full IA Framework using updated evidence where

⁹⁹ Telford & Wrekin (Sept 2014) SHLAA Viability Study prepared by PBA.

available in 2015. Please refer to Section 2 of this Report for the approach and method used to appraise site options through the IA. The findings of this work along with the reasons for the selection or rejection of site options were presented in Section 4 of the IA Report (July 2015) that accompanied the Draft Local Plan on public consultation from 03 August 2015 to 25 September 2015. The detailed appraisal matrices were provided in Appendix VI of the same Report.

- 4.53 As a result of the representations received on the Draft Local Plan (Regulation 18) the Council has made a number of changes to the Plan. These changes were screened to determine if they significantly affect the findings of the previous IA work for site options. The detailed screening matrix is presented in Appendix XI. The screening found that the majority of changes are minor and do not significantly affect the findings of the appraisal for site options presented in Appendix VI.
- 4.54 One of the changes to the Plan was the removal of urban areas from proposed mineral safeguarded areas, which affects the findings of a number of site options against IA Objective 7. There was also a slight amendment to the boundary of Telford Town Centre which affected the findings of the IA for some site options against IA Objective 10. The summary findings and detailed individual appraisals for site options were updated to reflect these changes. The updated summary findings were presented in Section 4 with updated individual appraisal matrices provided in Appendix VI of the IA Report Dec 2015) that accompanied the Local Plan Publication Version on consultation in February 2016. The reasons for the selection or rejection of reasonable site options were move into Appendix IX to reduce the size of the main IA Report.
- 4.55 During consultation on the Local Plan Publication Version from February to March 2016, three new site options were proposed. The two residential site options (Tessant House, Newport and Land East of Barnfield Farm, Wellington) and one employment site option (Land to the East of the A41 and to the south of Mere Park) were subject to IA by Enfusion against the full IA Framework. The summary findings of the IA for these sites have been incorporated into the summary findings for all reasonable site options set out below within this Section. The detailed individual matrices have been included Appendix VI and the reasons for the selection or rejection of all reasonable site options are provided in Appendix IX of this Report. AS a result of changes to Policy ER 2, the site option appraisals were updated to reflect the protection of buffer zones as well as Mineral Safeguarded Areas themselves. It is considered that the changes do not significantly affect the findings of the previous IA work.

Housing Site Options

Hadley & Leegomery

Table 4.10: Summary of IA Findings for housing site options in Hadley & Leegomery

Site Option	SA Objective															
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25
67	0	+	0	-	+	-	+	0	+	+	0	0	-	-	0	-
69	0	+	0	?	--	+	--	0	++	+	0	0	--	-	0	-
148	++	0	0	-	--	--	+	0	+	-	0	0	-	-	0	-
151	++	0	0	-	--	--	--	0	--	+	0	0	--	-	0	-
152	++	0	0	-	--	--	--	0	+	-	0	0	--	-	0	-
191	0	+	0	?	+	+	+	0	++	++	0	0	--	-	0	-
357	0	++	0	-	--	+	+	0	+	+	0	0	-	+	0	+
382	0	+	0	?	--	+	--	0	++	-	0	0	--	-	0 ?	-
388	++	0	0	-	--	--	--	0	--	+	0	0	-	--	0	--
410	++	0	0	?	--	--	--	0	++	-	0	0	--	-	0 ?	-
449	++	0	0	?	--	--	-	0	++	-	0	0	--	-	0 ?	-
493	0	+	0	?	+	+	+	0	++	+	0	0	-	-	0	-
565	0	+	-	-	--	--	--	0	--	+	0	0	-	-	0	+
700	-	+	0	-	--	--	--	0	--	-	0	0	-	-	0	--

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
725	-	+	0	?	--	--	--	0	++	-	0	0	--	-	0	-	0	-
Tessant House	0	+	-	?	+	-	++	0	--	-	0	0	--	+	0 ?	-	0	+

Ketley & Oakengates

Table 4.11: Summary of IA Findings for housing site options in Ketley & Oakengates

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
128	0	+	0	-	--	--	--	0	++	+	0	0	--	-	0	-	0	-
138	--	++	0	-	-	+	+	0	++	-	0	0?	--	-	0	--	-	+
196	0	+	0	-	--	--	+	0	+	+	0	0	--	-	0	-	0	-
197	0	+	0	-	+	+	+	0	++	+	0	0	-	-	0	-	0	-
306	0	+	0	-	++	+	++	0	+	+	0	0	+	+	0	-	0	++
335	0	+	0	-	--	+	++	0?	++	+	0	0	--	+	0	-	0	+
349	0	+	0	-	--	--	--	0	++	+	0	0	--	-	0	-	0	-
367	0	+	0	-	++	+	+	0	+	+	0	0	--	-	0	-	0	-
371	0	+	0	-	--	--	--	0	++	+	0	0	--	-	0	-	0	+
387	++	0	0	--	++	++	--	0	++	+	0	0	--	+	0?	--	0	+
397	0	+	0	-	++	+	+	0	+	+	0	0	--	-	0	-	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
428	0	+	0	-	+	+	++	0	+	+	0	0	--	-	0	-	0	-
437	0	+	0	-	--	+	++	0	+	+	0	0	--	-	0	-	0	-
474	0	+	0	-	--	--	--	0	++	+	0	0	--	-	0 ?	-	0	+
476	0	+	0	-	+	--	+	0	++	+	0	0	--	-	0	-	0	-
502	0	+	0	-	--	--	--	0	++	+	0	0	--	+	0	-	0	+
525	0	+	0	-	+	+	+	0	+	++	0	0	-	-	0	--	0	-
549	--	+	0	-	+	+	+	0	++	+	0	0	--	+	0	-	0	+
670	0	+	0	-	--	+	++	0	+	+	0	0	--	-	0	-	0	-
679	0	+	0	-	++	+	+	0	++	+	0	0	--	-	0	-	0	-
762	--	+	0	-	+	+	--	0	++	+	0	0	-	-	0	-	0	+
816	--	+	0	?	--	+	+	0	+	-	0	0	--	-	0	-	0	+

Muxton

Table 4.12: Summary of IA Findings for housing site options in Muxton

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
26	0	+	0	-	+	+	++	0	+	+	0	0?	--	-	0	-	0	-
31	?	+	0	?	--	--	--	0	+	-	0	0	-	+	0	-	0	+

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
101	0	+	0	-	+	--	+	0	+	-	0	0?	--	-	0	-	0	-
113	0	+	-	?	--	+	+	0	+	+	0	0?	-	--	0?	-	0	--
115	0	+	0	?	--	--	--	0	+	+	0	-	--	--	0	-	0	-
144	0	+	-	-	+	+	--	0	+	+	0	0	-	-	0	-	0	--
204	0	+	-	?	--	--	--	0	++	+	0	-	--	--	-?	-	0	-
265	0	+	-	?	--	--	--	0	++	++	0	-	--	-	0	-	0	--
350	0	+	0	-	+	+	--	0	+	+	0	0	-	-	0	-	0	--
351	0	+	-	-	+	+	--	0	+	+	0	0	-	-	0	-	0	--
393	++	0	0	?	--	--	+	0	++	+	0	-	--	-	0	--	0	+
405	0	++	-	-	+	--	--	0	++	-	0	0	-	--	0	--	0?	--
407	++	0	0	?	+	--	+	0	++	+	0	-	--	-	0	--	0	-
446	0	+	--	-	+	--	--	0	++	+	0	0	-	-	0	-	0	--
504	0	+	-	-	+	+	--	0	+	+	0	0	-	-	0?	-	0?	--
601	0	+	--	-	--	--	--	0	++	+	0	0	-	--	0	-	0	--
630	0	+	-	-	+	--	--	0	+	+	0	0	-	-	0	-	0	--
658	+	++	-	?	--	+	--	0	++	+	0	-	-	-	-?	--	0	--
729	0	+	0	?	--	+	--	0	+	-	0	0	-	--	-	-	0	--

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13		14	17	18	19	20	21	22	24	25	
809	0	+	--	?	--	--	--	0	+	+	0	0	-	-	0	-	0	--
813	0	+	-	-	+	--	--	0	+	+	0	0	-	-	0	-	0	--
902	0	+	-	?	--	--	--	0	+	-	0	0	-	-	0	-	-	--

Donnington

Table 4.13: Summary of IA Findings for housing site options in Donnington

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
401	0	+	0	-	+	+	++	0	+	+	0	0	--	+	0	-	0	+
759	0	+	0	-	--	--	--	0	--	+	0	0	-	-	0	-	0	-
760	0	+	0	-	--	--	--	0	+	+	0	0	-	-	0	-	0	-
761	0	+	0	-	--	--	--	0	--	+	0	0	-	-	0	-	-	-
820	++	0	0	?	--	--	--	0	+	+	0	0	--	-	0	--	0	-

Wrockwardine Wood & Trench

Table 4.14: Summary of IA Findings for housing site options in Wrockwardine Wood & Trench

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
10	--	+	0	-	+	+	--	0	++	+	0	0	--	+	0	-	0	+
100	0	+	0	-	+	+	+	0	++	+	0	0	--	-	0	-	-	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
118	--	+	0	-	+	+	+	0	+	+	0	0	--	-	0 ?	-	0	+
140	--	+	0	-	+	+	++	0	+	+	0	0 ?	--	?	0	-	0	+
157	0	+	0	-	+	+	+	0	+	+	0	0 ?	--	-	0	-	0	-
164	0	+	0	-	+	+	++	0	++	+	0	0	--	-	0	-	0	-
195	0	+	0	-	--	+	++	0	++	+	0	0	--	-	0	-	0	-
280	0	+	0	-	+	+	++	0	+	--	0	0	--	-	0	-	0	-
396	0	+	0	-	+	+	+	0	+	+	0	0	--	-	0	-	0	-
668	0	+	0	-	+	+	+	0	+	+	0	0	--	+	0	-	0	+
737	0	+	0	-	+	+	++	0	+	-	0	0	--	-	0	-	0	-

Lawley & Overdale

Table 4.15: Summary of IA Findings for housing site options in Lawley & Overdale

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
63	0	+	0	-	--	+	--	0	+	+	0	0	--	-	0	-	0	-
79	0	+	0	--	--	++	--	0	+	++	0	0	--	+	0	-	0	+
80	0	+	0	--	-	-	-	-	-	-	0	0	--	-	0	-	0	-
95	0	+	0	--	+	++	--	0	++	-	0	0	-	+	0	-	0	+

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13	14	17	18	19	20	21	22	24	25	
105	0	+	0	--	++	++	--	0	++	-	0	0	--	-	0	-	0	-
106	0	+	0	--	+	++	--	0	++	-	0	0	--	-	0	-	0	-
143	0	+	0	-	--	+	--	0	++	-	0	0	--	+	0	-	0	+
207	0	+	0	-	--	--	+	0	++	+	0	0	--	+	0	-	0	+
208	0	+	0	-	--	-	--	0	++	+	0	0	--	-	0	-	0	-
323	0	+	0	--	--	++	--	0	++	+	0	0	-	+	0	-	0	+
325	++	0	0	--	++	++	--	?	++	-	0	0	-	-	0	--	0	-
389	++	+	0	--	+	++	--	0	++	+	0	0	--	+	0	-	0	+
421	0	+	0	-	--	+	--	0	++	+	0	0	--	-	0	-	0	-
425	0	+	0	--	+	++	--	0	+	+	0	0	-	-	0	-	0	-
462	0	+	0	-	--	--	--	0	++	+	0	0	--	-	0	-	0	-
488	0	+	0	--	--	++	--	0	++	+	0	0	--	+	0	-	0	+
638	--	+	0	--	++	++	--	0	++	-	0	0	-	+	0	-	0	+
648	--	+	0	-	--	+	+	0	++	+	0	0	-	+	0	-	0	+
671	0	+	0	-	--	+	--	0	+	+	0	0	--	-	0	-	0	-
758	--	+	0	--	++	++	--	0	++	-	0	0	-	+	0	-	0	+

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
908	0	+	0	?	--	--	--	0	+	++	0	0	--	-	0 ?	-	0	-

Priorslee

Table 4.16: Summary of IA Findings for housing site options in Priorslee

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
24	0	+	0	--	--	+	--	0	--	+	0	0 ?	--	-	0	-	0	-
53	--	+	0	-	+	+	+	0	+	+	0	- ?	--	+	0	-	0	+
103	0	+	0	-	+	--	+	0	+	+	0	-	--	-	0	-	0	-
104	0	+	0	--	--	+	--	0	--	+	0	0	--	-	0	-	0	-
130	0	+	0	--	--	+	+	0	+	+	0	0	--	-	0	-	0	-
131	0	+	0	--	--	+	--	0	+	+	0	0	-	-	0	-	0	-
132	0	+	0	--	--	+	+	0	+	--	0	0	--	-	0	-	0	-
199	0	+	0	-	+	--	+	0	+	-	0	0	--	-	0	-	0	-
200	0	+	0	-	++	+	+	0	++	+	0	-	--	-	0	-	0	-
224	0	+	0	--	+	+	--	0	+	+	0	0	--	-	0	-	0	-
264	0	+	0	--	--	+	--	0	+	+	0	0	--	-	0	-	0	-
307	0	+	0	-	++	+	++	0	++	+	0	0	--	-	0	-	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
370	0	+	0	-	--	--	--	0	++	+	0	-	-	+	0	-	0	+
386	--	++	0	--	+	+	--	0	+	+	0	-	-	--	0	--	0	--
391	0	+	0	?	--	+	+	0	+	+	0	0	-	-	0	-	0	-
463	0	+	0	--	+	--	--	0	+	+	0	0	-	-	0 ?	-	0	-
464	0	+	0	--	++	+	--	0	+	+	0	0	-	-	0	-	0	-
542	--	+	0	-	+	--	+	0	+	-	0	-	--	+	0	-	0	+
543	0	+	0	-	+	--	+	0	+	-	0	0	--	-	0	-	0	-
604	0	+	0	--	--	+	+	0	+	+	0	0	-	-	0	-	0	-
615	0	+	0	-	+	--	+	0	+	-	0	0 ?	-	-	0	-	0	-
689	++	++	-	--	+	+	--	0	+	--	0	-	--	-	-	--	0	+

Nedge Hill

Table 4.17: Summary of IA Findings for housing site options in Nedge Hill

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
107	++	++	-	--	--	--	--	0	+	-	0	0	--	--	0	--	0	-
111	0	+	0	--	--	+	+	0	+	-	0	-	--	-	0	-	0	-
112	0	+	0	--	+	+	+	0	+	+	0	-	--	+	0	-	0	+

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
117	--	+	0	--	+	+	++	0	+	+	0	0	--	+	0	-	0	+
155	0	+	0	--	+	++	+	0	+	+	0	-	--	-	0	-	-	-
156	0	+	0	?	+	++	+	0	+	-	0	0?	--	-	0	-	0	-
220	0	+	0	--	+	++	+	0	++	+	0	-	--	+	0	-	0	+
229	0	+	0	--	--	+	+	0	+	-	0	0	--	--	0	-	-	-
379	--	+	0	--	+	--	+	0	+	++	0	0	--	-	0	-	0	+
605	0	+	0	--	+	+	+	0	+	-	0	0	--	--	0	-	0	-
606	0	+	0	--	--	--	+	0	+	-	0	0	--	--	0	-	-	-
607	0	+	0	--	+	--	+	0	+	+	0	0	--	--	0	-	0	-
608	0	+	0	--	+	--	+	0	+	+	0	0	--	--	0	-	0	-
612	0	+	0	--	+	+	+	0	+	+	0	0	--	--	0	-	0	-
672	0	+	0	--	+	+	--	0	--	-	0	0	--	-	0	-	0	-
673	0	+	0	--	+	++	++	0	+	+	0	-	--	-	0	-	0	-
753	--	+	0	--	++	++	--	0	++	+	0	0	-	+	0	-	0	+
912	0	+	0	?	--	--	--	0	+	+	0	0	--	+	0	-	0	+

Malinslee

Table 4.18: Summary of IA Findings for housing site options in Malinslee

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
269	0	+	0	--	--	--	+	0	++	+	0	-	--	-	0	-	0	-
324	--	+	0	--	+	++	--	0	+	+	0	0	--	-	0	-	0	+
326	--	+	0	--	+	++	--	0	+	-	0	0	-	+	0	-	0	+
501	0	++	0	--	+	++	+	0	++	-	0	-	--	-	0	--	0	-
562	0	+	0	--	--	++	+	0	+	+	0	-	--	--	0	-	0	+
677	0	+	0	--	--	+	++	0	+	+	0	0	--	-	0	-	0	-
909	0	+	0	?	--	--	--	0	+	+	0	0	--	+	0	-	0	+

Horsehay & Lightmoor

Table 4.19: Summary of IA Findings for housing site options in Horsehay & Lightmoor

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
135	0	+	0	--	--	--	+	0	+	+	0	0	-	-	0 ?	-	0	-
344	0	+	--	--	--	+	+	0	+	+	0	0 ?	-	-	0	-	0	-
385	0	+	0	?	--	--	+	0	+	+	0	-	--	-	0	-	-	-
429	0	+	0	--	--	+	+	0	+	+	0	0 ?	--	-	0	-	0	-
491	--	++	0	--	--	+	+	0	++	+	0	-	--	+	0 ?	--	0	+

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
510	--	+	0	--	--	+	+	0	+	+	0	-	--	+	0	-	0	+
524	0	+	--	?	--	--	--	0	+	+	0	0	-	-	0 ?	-	0	-
571	0	+	0	--	--	+	+	0	+	+	0	-	--	-	0	-	-	-
576	0	+	0	--	--	+	+	0	+	+	0	-	--	-	0	-	0	-
577	0	+	0	--	--	+	+	0	+	+	0	-	--	-	0 ?	-	-	-
588	0	+	0	--	--	+	+	0	+	+	0	0	-	-	0	-	0	-
687	--	+	0	--	--	+	+	0	++	+	0	0	-	+	0 ?	-	0	+
776	0	+	0	?	--	--	--	0	+	+	0	0	--	-	0	-	0	-
803	0	+	0	?	--	--	--	0	+	+	0	-	--	+	0	-	-	+

Ironbridge Gorge

Table 4.20: Summary of IA Findings for housing site options in Ironbridge Gorge

Site Option	SA Objective																
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25	
25	0	+	0	--	--	--	+	0	++	-	0	-	--	-	-	-	-
27	0	+	0	--	--	--	+	0	++	+	0	-	--	-	-	-	0
86	0	+	0	--	--	--	+	0	++	-	0	-	--	--	-	-	-
231	0	+	0	?	+	+	+	0	++	+	0	0	--	-	0	-	0

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
232	0	+	0	--	+	+	+	0	++	+	0	0 ?	--	-	- ?	-	0	-
236	0	+	0	--	--	+	+	0	++	+	0	-	--	-	-	-	0	-
268	--	+	0	?	--	+	--	0	--	+	0	-	-	-	0	-	0	+
375	--	+	0	--	+	+	+	0	++	+	0	-	--	-	0 ?	-	0	+
531	0	+	0	--	+	--	+	0	++	+	0	-	--	-	- ?	-	-	-
603	0	+	0	--	+	+	+	0	++	+	0	-	--	-	-	-	0	-
631	0	+	0	--	+	+	+	0	++	+	0	-	--	-	- ?	-	0	+
733	0	+	0	?	--	--	--	0	++	-	0	0	--	-	-	-	0	-

Cuckoo Oak

Table 4.21: Summary of IA Findings for housing site options in Cuckoo Oak

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
122	-	+	0	--	--	--	--	?	+	-	0	0	--	-	0	-	0	-
160	0	+	0	--	+	+	++	0	+	-	0	0	--	-	0	-	0	-
245	0	+	0	--	--	--	+	0	++	-	0	-	--	-	-	-	0	-
255	0	+	0	--	+	+	++	0	++	++	0	0	-	+	- ?	-	0	++
392	-	+	0	--	+	--	+	0	+	+	0	0	-	-	0	-	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
452	0	+	0	--	+	+	++	0	--	+	0	0	--	-	0	-	0 ?	-
467	0	+	0	--	+	+	++	0	+	+	0	0	--	-	0	-	0	-
468	0	+	0	--	+	+	++	0	+	++	0	0	--	-	0	-	0	-
685	0	+	0	--	+	+	++	0	++	++	0	0	--	-	0	-	0	-

Madeley

Table 4.22: Summary of IA Findings for housing site options in Madeley

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
29	--	+	0	--	+	+	++	0	++	+	0	0	+	+	0	-	-	++
233	0	+	0	--	+	+	+	0	++	+	0	0	--	-	- ?	-	0	-
243	0	+	0	--	--	--	+	0	++	-	0	-	--	-	- ?	-	0	+
244	0	+	0	--	+	+	++	0	+	+	0	0	--	-	- ?	-	0	-
461	0	+	0	--	--	+	++	0	--	+	0	0	-	-	- ?	-	0	+
514	0	+	0	--	+	+	++	0	+	+	0	-	--	+	- ?	-	0	+
657	--	+	0	--	+	+	++	0	--	+	0	0	--	+	- ?	-	0	+

Woodside

Table 4.23: Summary of IA Findings for housing site options in Woodside

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
230	0	+	0	--	+	--	+	0	++	+	0	0	--	-	0	-	0	-
257	0	+	0	--	+	+	+	0	++	+	0	-	--	-	0	-	0	-
258	0	+	0	--	+	--	+	0	++	+	0	-	--	-	0	-	0	-
259	0	+	0	--	+	+	+	0	++	-	0	0	--	-	0	-	0	-
260	0	+	0	--	+	+	+	0	++	+	0	-	--	-	0	-	-	-
378	0	+	0	--	+	--	+	0	++	+	0	0	--	-	0	-	0	-
560	--	+	0	?	+	+	++	0	+	+	0	0	--	-	0	-	0	+
910	0	+	0	?	--	--	--	0	+	+	0	0	+	+	0	-	0	++

Brookside

Table 4.24: Summary of IA Findings for housing site options in Brookside

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
467	0	0	-	--	+	+	++	0	+	+	0	0	--	-	0	-	0	+
468	0	0	--	--	+	+	++	0	+	+	0	0	--	-	0	-	0	-

Dawley Magna

Table 4.25: Summary of IA Findings for housing site options in Dawley Magna

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
21	0	+	0	--	+	--	++	0	++	++	0	0	--	-	0	-	0	-
65	0	+	0	--	+	--	+	0	++	+	0	-	--	-	0	-	0	-
136	0	+	0	--	+	+	++	0	++	+	0	0	-	-	0	-	0	-
159	0	+	0	--	+	--	++	0	+	+	0	0	--	-	0	-	0	-
206	0	+	0	--	--	--	+	0	++	+	0	0	--	-	0 ?	-	0	-
214	0	+	0	--	+	+	++	0	++	+	0	0	--	-	0	-	0	-
256	0	+	0	--	+	--	+	0	++	+	0	-	--	-	0	-	0	-
330	--	+	0	--	--	--	+	0	++	+	0	-	+	+	0 ?	-	0	++
372	0	+	0	--	--	+	+	0	++	+	0	0	--	-	0 ?	-	0	-
400	0	+	0	--	+	--	+	0	++	+	0	-	--	-	0	-	0	-
433	0	+	0	--	--	+	++	0	++	+	0	0	--	-	0 ?	-	0	-
436	0	+	0	--	--	+	++	0	++	+	0	0	--	-	0	-	0	-
486	0	+	0	--	+	+	++	0	++	++	0	0	--	-	0 ?	-	0	-
640	--	+	0	--	--	+	++	0	+	+	0	0	+	+	0	-	0	++
676	0	+	0	--	+	--	+	0	++	+	0	0	--	-	0	-	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
732	--	+	0	--	+	+	++	0	++	++	0	0	--	-	0	-	0	+

Arleston

Table 4.26: Summary of IA Findings for housing site options in Arleston

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
3	--	+	0	-	+	+	++	0	+	+	0	0	-	+	0 ?	-	0	+
454	0	+	0	-	--	+	+	0	--	+	0	0	--	-	0 ?	-	0	+
548	0	+	0	-	--	+	+	0	+	+	0	0	--	-	0 ?	-	0	-

Ercall

Table 4.27: Summary of IA Findings for housing site options in Ercall

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
173	0	+	0	-	++	++	+	0	++	+	0	0	-	+	0 ?	-	0	+
277	0	+	0	-	++	++	++	0	++	++	0	0	--	-	0 ?	-	0	-
426	0	+	0	-	+	++	+	0	++	+	0	0	--	+	0	-	0	+
450	0	+	-	-	--	--	+	0	++	+	0	0	-	--	- ?	-	0	+
507	--	+	-	-	--	--	+	0	+	+	0	0	-	--	0	-	0	+
512	0	+	0	-	--	+	+	0	++	+	0	0	-	-	0	-	0	+

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
655	0	+	0	-	--	+	++	0	++	+	0	0	--	-	0	-	0	-
660	--	+	0	-	++	++	+	0	++	+	0	0	--	+	0	-	0	+
Barnfield Farm	0	+	-	?	--	-	+	?	++	+	0	0	--	-	- ?	-	0	-

Haygate

Table 4.28: Summary of IA Findings for housing site options in Haygate

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
175	0	+	0	-	++	++	+	0	++	+	0	0	-	+	0	-	0	+
272	0	+	0	-	++	++	+	0	+	+	0	0	+	+	0	-	0	++
356	--	+	0	-	++	++	+	0	+	+	0	0	+	+	0 ?	-	0	++
690	0	+	0	-	+	++	+	0	+	-	0	0	--	-	0	-	0	-

Dothill

Table 4.29: Summary of IA Findings for housing site options in Dothill

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
125	0	+	0	-	+	--	+	0	+	+	0	0	-	-	0	-	0	-
188	0	+	0	-	+	+	+	0	+	+	0	0	--	-	0	-	0	-
748	0	+	0	-	+	+	++	0	++	+	0	-	--	-	0	-	0	-

Shawbirch

Table 4.30: Summary of IA Findings for housing site options in Shawbirch

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
16	0	+	--	-	--	+	+	0	+	+	0	0	-	--	0 ?	-	-	-
395	0	+	0	-	--	+	+	0	++	-	0	-	--	-	0	-	-	-
665	0	+	0	-	--	+	+	0	+	-	0	0	--	-	0	-	0	-

Apley Castle

Table 4.31: Summary of IA Findings for housing site options in Apley Castle

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
99	0	+	0	?	--	--	+	0	+	+	0	0	--	-	0	-	0	-
189	0	+	0	?	+	+	++	0	++	+	0	0	--	-	0	-	0	-
190	0	+	0	?	+	+	++	0	+	+	0	0	--	-	0	-	0	-
361	0	++	-	-	--	--	+	0	+	-	--	0	-	--	0 ?	--	-	-
411	--	++	0	?	+	+	+	0	++	+	0	0	--	+	0	--	0	+
443	0	+	0	?	+	+	++	0	++	+	0	0	-	-	0	-	0	-
500	++	0	0	?	+	+	+	0	+	+	0	0	--	-	0	--	0	+
506	0	+	0	?	+	--	+	0	++	+	0	0	-	-	0	-	0	+

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
611	0	++	--	-	--	--	+	0	+	+	0	0	-	--	0	--	-	--
614	0	+	--	?	--	--	+	0	++	+	0	0	--	-	0	-	0	-

St Georges

Table 4.32: Summary of IA Findings for housing site options in St Georges

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
53	--	+	0	-	+	+	+	0	+	+	0	-	--	+	0	-	0	+
103	0	+	0	-	+	--	+	0	+	+	0	-	--	-	0	-	0	-
200	0	+	0	-	++	+	+	0	++	+	0	0	--	-	0	-	0	-
307	0	+	0	-	++	+	++	0	++	+	0	0	--	-	0	-	0	-

Park

Table 4.33: Summary of IA Findings for housing site options in Park

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
424	0	+	0	-	+	+	+	0	+	+	0	0	--	-	0	-	-	+
642	0	+	0	-	+	+	+	0	+	+	0	0	-	-	0	-	-	+
656	-	+	0	-	+	+	++	0	+	+	0	0	--	-	0	-	0	-
661	0	+	0	-	++	++	++	0	+	++	0	0	--	+	0	-	0	+

College

Table 4.34: Summary of IA Findings for housing site options in College

Site Option	SA Objective																
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25	
192	0	+	0	-	+	+	+	0	++	++	0	0	--	-	0	-	-
432	--	+	0	-	+	+	+	0	--	+	0	0	--	+	0	-	+
460	--	+	0	-	+	+	+	0	++	+	0	0	--	+	0	-	+

Newport North

Table 4.35: Summary of IA Findings for housing site options in Newport North

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
352	0	+	--	--	--	++	+	0	--	+	0	0	-	--	0	-	0	-
373	0	+	--	--	--	--	++	0	+	+	0	0	-	-	0	-	0	--
374	0	+	--	--	--	--	+	0	+	+	0	-	-	--	0	-	0	-
456	--	+	--	--	--	++	+	0	+	+	0	0?	-	-	0?	-	0	+
478	--	+	--	--	--	++	+	0	--	+	0	0?	-	-	0?	-	0	+
485	0	+	0	--	--	++	+	0	+	+	0	0?	-	-	0	-	0	-
617	--	+	--	--	--	--	+	0	+	+	0	0	-	-	0	-	0	+
755	0	+	-	--	--	--	++	0	+	-	0	0	-	-	0	-	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
823	0	+	-	?	--	--	--	0	+	-	0	0	-	-	0	-	0	-

Newport South

Table 4.36: Summary of IA Findings for housing site options in Newport South

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
416	0	+	--	--	+	--	+	0	+	+	0	0	-	-	0	-	0	-
439	0	+	-	--	+	--	+	0	+	+	0	0	-	-	0	-	0	-
616	0	+	0	--	--	--	+	0	--	+	0	0	-	-	0	-	0	-
624	--	+	-	--	+	--	+	0	+	+	0	0	-	+	0	-	0	+

Newport East

Table 4.37: Summary of IA Findings for housing site options in Newport East

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
19	0	+	--	--	+	--	+	0	+	++	0	0	-	-	0	-	-	-
589	0	+	0	--	--	--	+	0	++	+	0	-	-	-	0	-	-	-

Newport West

Table 4.38: Summary of IA Findings for housing site options in Newport West

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
430	--	+	0	--	+	++	+	0	+	++	0	-	-	+	0 ?	-	0	+
440	0	+	0	--	+	++	++	0	+	+	0	0	+	+	0 ?	-	0	+
721	0	+	--	?	+	--	++	0	--	-	0	0	-	-	0	-	0	+
722	0	+	--	?	+	--	++	0	--	-	0	0	-	-	0	-	0	--

Church Aston & Lilleshall

Table 4.39: Summary of IA Findings for housing site options in Church Aston & Lilleshall

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
15	0	+	--	?	--	--	+	0	--	-	0	0	-	-	0 ?	-	0	-
20	0	+	--	?	--	--	+	0	--	-	0	0	-	-	0	-	0	-
120	0	+	--	?	--	--	+	0	--	-	0	0	-	-	0	-	0	-
329	0	+	--	?	+	--	++	0	--	-	0	0	-	--	0 ?	-	0	--
342	0	+	--	--	+	--	++	0	+	-	0	0	-	-	0	-	0	-
345	0	+	--	-	+	--	--	0	++	-	0	-	-	-	0	-	0	-
448	0	+	-	--	--	--	+	0	--	++	0	0	-	-	0	-	0	-
455	--	+	0	-	--	--	+	0	--	-	-	0	-	--	0 ?	-	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
481	0	+	--	?	--	+	+	0	--	-	0	0	-	--	0 ?	-	0	-
482	0	+	0	-	+	+	--	0	+	+	0	0	-	-	0	-	-	--
508	0	++	-	-	+	+	--	0	--	+	0	0	-	-	0	--	-	--
520	0	+	-	--	+	--	+	0	+	+	0	0	-	-	0 ?	-	0	-
575	0	+	0	--	--	--	+	0	+	+	0	0	-	-	0	-	0	-
597	0	+	0	--	+	--	++	0	+	+	0	0	-	-	0	-	0	-
609	0	+	--	-	--	--	--	0	+	-	0	0	-	--	0	-	-	--
703	0	+	0	-	--	--	+	0	--	-	0	0	-	--	0 ?	-	0	-
704	0	+	0	-	--	--	--	0	--	-	0	0	-	--	0 ?	-	0	-
705	0	+	0	-	--	--	--	0	--	-	0	0	-	-	0 ?	-	-	-
706	0	+	-	-	--	--	--	0	--	-	0	0	-	--	0 ?	-	0	-
707	0	++	-	-	--	--	--	0	--	-	0	0	-	--	0	-	-	-
708	0	+	-	-	--	--	--	0	+	-	0	0	-	--	0	-	0	--
711	0	+	-	-	--	--	--	0	+	-	0	0	-	--	0	-	0	--
712	0	+	-	-	--	--	--	0	+	-	0	0	-	--	0	-	0	--
713	0	+	-	-	--	--	--	0	+	-	0	0	-	--	0	-	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
714	0	+	-	-	--	--	--	0	--	+	0	0	-	--	0	-	0	-
723	0	+	--	--	--	--	+	0	+	+	0	0	-	--	0	-	0	-
771	0	+	-	-	+	--	--	0	++	+	0	0	-	-	0 ?	-	0	-
801	--	+	-	?	--	--	--	0	+	-	0	0	-	-	- ?	-	0	-
805	0	+	-	?	--	--	--	0	+	-	0	0	-	-	- ?	-	0	-
810	0	++	-	?	--	--	--	0	+	+	0	0	-	-	0	-	-	--
901	0	+	-	?	--	--	--	0	+	-	0	0	-	-	0	-	-	--

Edgmond & Ercall Magna

Table 4.40: Summary of IA Findings for housing site options in Edgmond

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
6	0	+	-	--	--	--	--	0	--	-	0	0	-	-	0 ?	-	0	+
8	0	+	0	--	--	--	+	0	+	++	0	0	-	-	0 ?	-	0	-
38	0	+	--	-	--	--	+	0	--	++	0	0	-	-	0 ?	-	0	+
39	0	+	-	-	--	--	--	0	--	+	0	0	-	-	0	-	0	-
40	0	+	0	--	--	--	--	0	+	++	0	0	-	-	0	-	0	-
43	0	+	-	--	--	--	--	0	--	-	0	0	-	-	0	-	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
44	--	+	--	-	--	--	--	0	+	-	0	0	-	+	0 ?	-	0	+
45	0	+	-	-	--	--	--	0	+	-	0	0	-	-	0	-	0	-
49	0	+	--	?	--	--	--	0	+	-	0	0	-	-	0	-	0	-
51	0	+	0	?	--	--	--	0	--	-	0	0	-	-	0	-	0	-
121	0	+	--	-	--	--	+	0	--	+	0	0	-	-	0 ?	-	0	+
139	0	+	-	?	--	--	--	0	--	-	0	0	-	-	0	-	0	-
153	++	++	--	-	--	+	+	0	+	+	0	0	--	--	0	--	0	--
332	0	+	0	--	--	+	+	0	+	+	0	0	-	--	0 ?	-	0	-
339	0	+	--	--	--	--	--	0	+	-	0	0	-	+	0	-	0	+
346	0	+	--	-	--	--	--	0	--	+	0	0	-	-	0	-	0	-
364	0	+	-	?	--	--	--	0	--	-	0	0	-	-	0	-	0	+
366	0	+	-	?	--	--	--	0	+	+	0	0	-	-	0	-	-	-
390	-	+	--	-	--	--	+	0	--	++	0	0	-	-	0 ?	-	0	-
404	0	+	--	--	--	--	--	0	--	-	0	0	-	-	0	-	0	-
406	0	+	--	--	--	--	--	0	--	-	0	0	-	-	0	-	0	-
420	0	+	--	--	--	--	--	0	--	-	0	0	-	-	0 ?	-	0	-
434	0	+	0	-	--	--	--	0	--	+	0	0	-	-	0	-	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
438	0	++	--	--	--	--	+	0	--	-	0	0	-	-	0	--	-	-
457	0	+	0	?	--	--	+	0	+	++	0	0	-	-	0	-	0	-
475	0	+	--	?	--	--	--	0	--	-	0	0	-	-	0	-	0	-
509	0	+	-	?	--	--	+	0	+	+	0	0	-	-	0	-	0	-
515	0	+	-	?	--	--	--	0	--	-	0	0	-	-	0	-	0	-
516	0	+	-	?	--	--	--	0	+	+	0	0	-	-	0?	-	0	-
518	--	++	--	-	--	--	+	0	+	-	0	0	-	--	0?	--	0	+
519	0	+	-	-	--	--	--	0	--	-	0	0	-	--	0?	-	-	--
551	0	+	--	--	--	--	--	0	--	-	0	0	-	-	0?	-	0	-
568	0	+	-	--	--	--	--	0	--	-	0	0	-	-	0	-	0	-
574	0	+	-	?	--	--	--	0	+	+	0	0	-	-	0	-	0	-
580	0	+	0	--	--	--	--	0	+	+	0	0	-	-	0	-	0	-
582	0	+	0	?	--	--	--	0	+	+	0	0	-	-	0	-	0	-
583	0	+	0	?	--	--	--	0	+	+	0	0	-	-	0	-	0	-
584	--	+	0	?	--	--	--	0	--	-	0	0	-	+	0	-	0	+
610	0	+	--	-	--	--	+	0	+	+	0	0	-	--	0	-	0	--

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
622	0	+	-	?	--	--	--	0	+	+	0	0	-	-	0	-	0	-
634	0	+	--	--	--	--	--	0	--	-	0	0	-	-	0 ?	-	0	+
635	0	+	--	--	--	--	--	0	--	-	0	0	-	-	0 ?	-	0	-
699	0	+	-	?	--	--	--	0	+	+	0	0	-	-	0	-	-	-
701	0	+	-	--	--	--	+	0	--	-	0	0	-	-	0 ?	-	0	-
702	0	+	-	--	--	--	--	0	--	-	0	0	-	-	0	-	0	-
710	0	+	-	?	--	--	--	0	+	+	0	0	-	-	0	-	-	+
726	0	+	--	--	--	--	--	0	--	-	0	0	-	-	0	-	0	-
734	0	+	0	?	--	--	--	0	+	+	0	0	-	-	0	-	0	-
744	0	+	0	?	--	--	--	0	+	+	0	0	-	-	0	-	0	+
746	0	+	--	?	--	--	--	0	--	-	0	0	-	-	0 ?	-	0	+
749	0	+	0	?	--	--	--	0	+	+	0	0	-	-	0	-	0	-
757	0	+	-	?	--	--	--	0	+	-	0	0	-	-	0	-	0	-
766	0	+	-	-	--	--	--	0	--	-	0	0	-	-	0	-	0	-
767	0	+	-	-	--	--	--	0	--	-	0	0	-	-	0	-	0	-
770	0	+	-	?	--	--	--	0	+	+	0	0	-	-	0	-	0	-
800	0	+	-	?	--	--	--	0	+	+	0	0	-	-	0 ?	-	-	+

Site Option	SA Objective															
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25
802	0	+	--	?	--	--	--	0	+	+	0	0	-	-	0	-
806	0	+	--	?	--	--	--	0	+	-	0	0	-	-	0 ?	+
808	0	+	-	?	--	--	--	0	+	-	0	0	-	-	0	-
811	0	+	-	?	--	--	--	0	+	-	0	0	-	-	0	+
814	0	+	--	?	--	--	--	0	+	-	0	0	-	-	0	-
818	0	+	--	?	--	--	--	0	+	-	0	0	-	-	0 ?	-
819	0	+	--	?	--	--	--	0	+	-	0	0	-	-	0	-
821	0	+	--	?	--	--	--	0	+	++	0	0	-	-	0	-
822	0	+	-	?	--	--	--	0	+	+	0	0	-	-	0	-
900	--	+	--	?	--	--	--	0	+	-	0	0	+	+	0 ?	+
Land at Tibberton	0	+	0	?	--	--	+	0	+	-	0	0	-	-	0	--

Wrockwardine

Table 4.41: Summary of IA Findings for housing site options in Wrockwardine

Site Option	SA Objective															
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25
14	0	+	--	0	--	--	--	0	+	+	0	0	-	-	0	-
18	--	+	--	?	--	--	--	0	+	-	0	0	+	+	0	++

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
34	0	+	-	?	--	--	--	0	+	-	0	0	-	-	0 ?	-	0	-
41	0	+	-	?	--	--	--	0	--	-	0	0	-	-	0	-	0	-
54	0	+	--	?	--	--	--	0	--	-	0	0	-	-	0	-	0	-
55	0	+	--	?	--	--	--	0	--	+	0	0	-	-	0	-	0	-
56	0	+	0	-	--	--	+	0	++	+	0	0	-	--	- ?	-	0	--
57	0	+	-	?	--	--	--	0 ?	+	+	0	0	-	-	0	-	0	-
59	0	+	-	?	--	--	--	0 ?	+	+	0	0	-	-	0 ?	-	0	-
60	0	+	-	?	--	--	--	0 ?	--	-	0	0	-	--	0	-	0	-
184	0	+	0	-	--	+	+	0	++	+	0	-	--	-	0 ?	-	-	-
185	0	+	0	-	--	+	+	0	++	++	0	0	-	-	0	-	0	-
331	--	+	-	?	--	--	--	0	+	+	0	-	-	+	0	-	0	+
343	0	+	--	?	--	--	--	0	--	-	0	-	-	--	0	-	0	-
347	0	+	-	?	--	--	--	0	--	-	0	0	-	-	0	-	0	-
353	0	+	--	0	--	--	--	0	+	+	0	0	-	-	0 ?	-	0	-
377	0	+	--	?	--	+	--	0	+	+	0	0	-	-	0	-	0	--
380	0	+	0	?	--	+	++	0	++	+	0	0	--	-	0	-	0	-

Site Option	SA Objective															
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25
381	0	+	0	?	--	+	++	0	++	+	0	0	--	-	0	-
394	0	+	-	-	+	--	+	0	+	+	0	0	-	--	- ?	-
418	0	+	--	?	--	--	--	0	--	+	0	0	-	-	0 ?	-
435	--	++	--	?	--	--	--	0	+	-	0	-	-	--	-	--
445	0	+	0	-	--	+	+	0	++	+	0	0	--	-	0	-
487	0	+	0	-	--	+	+	0	++	+	0	0	--	-	0	-
494	0	+	-	-	--	--	+	0 ?	++	+	0	0	-	--	0	-
511	0	+	--	?	--	+	--	0	+	+	0	0	-	-	0	-
517	0	+	-	?	--	--	--	0	++	-	0	0	-	--	0	--
537	--	+	--	?	--	--	--	0	--	+	0	0	-	+	0 ?	-
538	0	+	0	?	--	--	--	0	+	-	0	0	-	-	0	+
563	0	+	--	?	--	+	+	0	+	+	0	0	-	-	0	--
564	0	+	--	?	--	+	--	0	+	+	0	0	-	-	0	--
567	--	+	--	?	--	+	--	0	+	+	0	0	-	-	0	+
569	0	+	0	-	--	--	--	0	+	+	0	0	--	-	0	-
570	--	++	--	?	--	--	--	0	--	-	0	0	-	-	--	-
591	0	+	0	-	--	+	+	0	++	+	0	0	--	-	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
595	0	++	-	?	--	+	--	0	+	+	0	0	-	-	0	--	0	--
613	0	+	--	-	--	+	+	0	+	+	0	0	-	-	0	-	0	-
623	0	+	--	?	--	--	--	0?	++	+	0	0	-	-	0	-	0	-
628	0	+	-	-	--	--	+	0	++	+	0	0	-	-?	0?	-	0	-
641	0	+	0	-	--	+	+	0	+	+	0	0	--	--	0?	-	-	-
654	0	+	--	?	--	--	--	0	--	+	0	0	-	-	0?	-	0	-
662	0	+	0	?	--	--	--	0	++	+	0	0	--	-	0	-	0	-
692	0	+	--	?	--	--	--	0	--	++	0	0	-	-	0?	-	0	-
694	0	++	-	?	--	--	--	0	--	++	0	-	-	+	0	--	0	+
696	0	+	--	?	--	--	--	0	--	-	0	0	-	-	0?	-	-	-
697	0	+	--	0	--	--	--	0	+	+	0	0	-	-	0	-	-	-
698	0	+	-	?	--	--	--	0	--	-	0	0	-	-	0	-	0	+
716	0	+	-	0	--	--	--	0	+	+	0	0	-	-	0	-	0	-
719	0	+	-	?	--	--	--	0	+	-	0	0	-	-	0?	-	-	-
751	0	+	-	0	--	--	--	0	+	+	0	0	-	-	0	-	-	-
754	0	+	--	?	--	--	--	0	+	+	0	-	-	--	0	-	0	--

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
763	0	+	-	?	--	--	--	0	++	-	0	0	-	-	0	-	0	-
764	0	+	-	?	--	--	--	0	+	-	0	0	-	-	0	-	0	-
765	0	+	--	?	--	--	--	0	++	-	0	0	-	-	0 ?	-	0	-
773	0	+	-	?	--	--	+	0 ?	++	+	0	-	-	--	0	-	0	-
804	0	+	-	?	--	--	--	0	+	-	0	0	-	-	0	-	0	-
812	--	+	--	?	--	--	--	0	+	+	0	0	-	-	0 ?	-	0	+
817	0	+	-	?	--	--	--	0	+	+	0	0	-	-	0 ?	-	-	-

Employment Site Options

Central Telford

Table 4.42: Summary of IA Findings for employment site options in Central Telford

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
1	++	0	0	--	+	-	N/A	0	++	+	0	0	--	+	0	?	0	+
2	++	0	0	--	++	++	N/A	0	++	+	0	0	--	+	0	?	0	+
3	++	0	0	--	++	-	N/A	0	++	+	0	0	--	-	0	?	0	-
4	++	0	0	--	+	-	N/A	0	++	+	0	0	--	-	0	?	0	-
5	++	0	0	--	+	++	N/A	0	++	+	0	0	--	-	0	?	0	-
6	++	0	0	--	++	++	N/A	0	++	-	0	0	--	-	0	?	0	-
7	++	0	0	--	++	++	N/A	0	++	-	0	0	-	+	0 ?	?	0	+
8	++	0	0	--	+	++	N/A	0	++	+	0	0	-	+	0	?	0	+

Donnington Wood

Table 4.43: Summary of IA Findings for employment site options in Donnington Wood

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
1	+	0	0	?	--	--	N/A	0	++	+	0	0	--	-	0	?	0	+
2	+	0	0	?	--	--	N/A	0	+	+	0	0	--	-	0	?	0	-
3	+	0	0	?	--	--	N/A	0	++	+	0	0	--	-	0	?	0	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
4	+	0	-	?	--	--	N/A	0	++	+	0	0	--	-	0	?	0	--

Hadley Park

Table 4.44: Summary of IA Findings for employment site options in Hadley Park

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
1	++	0	0	-	--	--	N/A	0	++	-	0	0	--	-	0 ?	?	0	-
2	++	0	0	-	--	--	N/A	0	++	-	0	0	--	-	0 ?	?	0	-
3	++	0	0	-	--	--	N/A	0	++	-	0	0	--	-	0	?	0	-
4	++	0	0	-	--	--	N/A	0	++	-	0	0	--	-	0	?	0	-

Halesfield

Table 4.45: Summary of IA Findings for employment site options in Halesfield

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
1	++	0	0	--	+	+	N/A	0	+	+	0	0	--	-	0	?	0	-
2	++	0	0	--	+	+	N/A	0	+	+	0	0	--	-	0	?	0	-
3	++	0	0	--	+	+	N/A	0	+	+	0	0	--	-	0	?	--	-
4	++	0	0	--	+	--	N/A	0	+	+	0	0	--	-	0	?	0	-
5	++	0	0	--	+	+	N/A	0	+	+	0	0	--	-	0	?	-	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
6	++	0	0	--	+	--	N/A	0	+	+	0	0	--	-	0	?	0	-
7	++	0	0	--	--	+	N/A	0	+	-	0	0	--	-	0	?	-	-
8	++	0	0	--	--	--	N/A	0	+	-	0	0	--	-	0	?	0	-
9	++	0	0	--	--	+	N/A	0	+	+	0	0	--	-	0	?	-	-
10	++	0	0	--	+	+	N/A	0	+	+	0	0	--	-	0	?	-	-
11	++	0	0	--	--	+	N/A	0	+	+	0	0	--	-	0	?	-	-
12	++	0	0	--	--	+	N/A	0	+	-	0	0	--	-	0	?	0	-
13	++	0	0	--	--	--	N/A	0	+	+	0	0	--	-	0	?	-	-
14	++	0	0	--	+	+	N/A	0	+	+	0	0	--	-	0	?	0	-

Hortonwood

Table 4.46: Summary of IA Findings for employment site options in Hortonwood

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
2	++	0	0	-	--	+	N/A	0	++	+	0	0	--	-	0	?	0	-
3	++	0	0	-	--	--	N/A	0	+	-	0	0	--	-	0	?	--	-
4	++	0	0	-	--	--	N/A	0	+	-	0	0	--	-	0	?	0	-
5	++	0	0	-	--	--	N/A	0	+	-	0	0	--	-	0	?	-	-

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
6	++	0	0	-	--	--	N/A	0	+	-	0	0	--	-	0	?	0	-
7	++	0	0	-	--	--	N/A	0	+	-	0	0	--	-	0	?	0	-
8	++	0	0	-	--	--	N/A	0	+	-	0	0	--	-	0	?	0	-
9	++	0	0	-	--	--	N/A	0	+	-	0	0	--	-	0	?	-	-
10	++	0	0	-	--	--	N/A	0	--	+	0	0	--	-	0	?	-	-
11	++	0	0	-	+	+	N/A	0	++	+	0	0	--	-	0	?	-	-
12	++	0	0	-	--	--	N/A	0	++	-	0	0	--	-	0	?	0	-
13	++	0	0	-	--	--	N/A	0	+	-	0	0	--	-	0	?	0	-
14	++	0	0	-	--	+	N/A	0	+	-	0	0	--	-	0	?	-	-
15	++	0	0	-	--	--	N/A	0	+	-	0	0	--	-	0	?	0	-
16	++	0	0	-	--	--	N/A	0	++	-	0	0	--	-	0	?	0	-
17	++	0	0	-	--	--	N/A	0	++	+	0	0	--	-	0	?	0	-
18	++	0	0	-	+	+	N/A	0	++	+	0	0	--	-	0	?	0	-

Lightmoor

Table 4.47: Summary of IA Findings for employment site options in Lightmoor

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
1	+	0	0	--	--	--	N/A	0	++	+	0	-	--	-	0	?	-	-
2	+	0	0	--	--	+	N/A	0	+	+	0	0	--	-	0	?	0	-

Nedge Hill

Table 4.48: Summary of IA Findings for employment site options in Nedge Hill

Site Option	SA Objective																	
	1-3	4	7	8	9	10		13		14	17	18	19	20	21	22	24	25
1	+	0	0	--	+	--	N/A	0	+	++	0	0	--	-	0	?	0	-
2	+	0	-	--	--	--	N/A	0	+	-	0	0	--	--	0	?	0	-
3	+	0	0	--	--	--	N/A	0	+	+	0	0	--	-	0	?	0	-
4	+	0	0	--	+	--	N/A	0	+	+	0	0	--	-	0	?	0	-
5	+	0	0	--	--	--	N/A	0	+	+	0	0	--	-	0	?	0	-

Newport

Table 4.49: Summary of IA Findings for site employment site options in Newport

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
1	++	0	0	--	--	-	N/A	0	--	++	0	0	--	-	0	?	0	-

Priorslee

Table 4.50: Summary of IA Findings for site employment site options in Priorslee

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
1	+	0	0	--	--	+	N/A	0	+	-	0	0	--	-	0 ?	?	0	+

Rural Sites

Table 4.51: Summary of IA Findings for site employment site options in Rural Area

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
1	+	0	-	?	--	--	N/A	0	+	++	0	-	-	+	0	?	0	+
2	+	0	-	?	--	--	N/A	0	+	+	0	0	--	-	0 ?	?	0	-
3	+	0	-	?	--	--	N/A	0	++	++	0	0	--	--	0 ?	?	0	-
4	+	0	-	?	--	--	N/A	0	+	+	0	0	--	-	0	?	0	-
5	+	0	-	?	--	--	N/A	0	--	-	0	0	--	-	0 ?	?	0	+
6	+	0	--	?	--	--	N/A	0	+	+	0	0	--	--	0	?	0	-

Shawburch

Table 4.52: Summary of IA Findings for site employment site options in Shawburch

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
1	+	0	--	?	--	+	N/A	0	+	+	0	0	--	--	0	?	0	--

2	+	0	0	?	+	+	N/A	0	++	+	0	0	--	-	0	?	0	+
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Wappenshall

Table 4.53: Summary of IA Findings for site employment site options in Wappenshall

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
1	++	0	--	-	--	--	N/A	0	+	+	0	0	--	-	0	?	0	--
2	++	0	-	-	--	+	N/A	0	++	-	0	0	--	-	0	?	-	--
3	++	0	--	-	--	+	N/A	0	+	+	0	0	--	--	0	?	-	--
4	++	0	0	-	--	--	N/A	0	--	+	0	0	--	--	0	?	-	--

Church Aston & Lilleshall

Table 4.54: Summary of IA Findings for site employment site options in Church Aston & Lilleshall

Site Option	SA Objective																	
	1-3	4	7	8	9	10	13	14	17	18	19	20	21	22	24	25		
E A41 & south of Mere Park	++	0	-	?	--	-	N/A	0	+	+	0	0	--	-	0	?	0	-

- 4.56 The findings of the IA for the housing site options informed the next stage of the Council's site selection process. A proforma was prepared by the Council for each of the housing site options that considered potential constraints, type of land, location, yield and existing infrastructure as well as the findings of the IA. Based on this information a planning judgement was then made to determine if the site was suitable or unsuitable for further consideration. Out of the 421 reasonable housing site options 79 were not considered suitable. This left 342 housing site options which were progressed to the next stage in the Council's site selection process.
- 4.57 The remaining 'suitable' housing site options were then considered against 10 strategic fit criteria, which are presented in the Table below.

Table 4.55: Strategic Fit Criteria

Strategic fit criteria	Definitions and justifications
1. Focussing growth on the urban areas of Telford and Newport	Growth is either within, immediately associated/contiguous with or clearly and sustainably connected to the urban areas of Telford or Newport.
2. Protection of strategic green space and valuable landscapes	Protection of designated landscapes, the Green Network and high quality agricultural land (class 2 or 3a).
3. Sustaining and enhancing local urban centres	Development should be in close proximity and well connected to a Local, District, or Town Centre or located in a Market Town.
4. Promote sustainable urban extensions	Be of sufficient scale and critical mass to deliver comprehensive social, economic and environmental infrastructure, being well connected to existing development.
5. Supports the strategic employment areas/eastern arc	Adopting an approach which: Located homes closer to jobs; and Facilitates greater opportunity for the promotion of sustainable transport patterns.
6. Supports areas of social deprivation especially the Target Intervention Areas	Supporting development that can bring community benefit through provision of facilities and/or financial contributions.
7. Maximises opportunity for infrastructure investment	Locating development in areas which can harness existing commitments to invest in infrastructure from the LEP, HCA and other investors in the borough.
8. Responses to the availability of public land	Development that assists in the provision of social and educational infrastructure helps protect public services and can demonstrate good stewardship of public assets and resources.
9. A balanced provision which is complimentary with existing commitments	To produce a balance distribution of development in the borough. Areas with sufficient commitment such as the Rural Area are therefore excluded.
10. Harnesses connections especially main highways, cycleways,	Locating development where it is well connected to existing infrastructure and exploits proximity to sustainable transport modes.

footways and public transport corridors.	
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- 4.58 Following the consideration of the strategic fit criteria 29 housing site options were progressed, which now form the 17 housing allocations proposed in the Local Plan. The number of housing allocations is less than the number of progressed housing site options as a number of them were joined to form larger allocations.
- 4.59 Following consultation on the PHES, the employment site options were put through a further consideration test by the Council whereby sites which revealed large physical constraints were removed. The Council's site selection method along and findings of the IA informed the decision to progress 28 of the employment site options.
- 4.60 Appendix IX provides an outline of the reasons for selection/rejection of reasonable alternatives for sites in plan-making where relevant. It should be noted that whilst the IA findings are considered by the Council in its selection of options and form part of the evidence supporting the Local Plan, the IA findings are not the sole basis for a decision; other factors, including planning and deliverability, play a key role in the decision-making process. It is important to also note that the site options have also been considered through the Council's own site assessment method.

5.0 Integrated Appraisal of the Local Plan

Introduction

- 5.1 This Section sets out the findings of the IA of the Local Plan. It is structured according to 12 key topics which have been linked to relevant IA Objectives as well as SEA Directive topics and relevant paragraphs from the NPPF. The appraisal of each topic has been divided into a number of sub-headings to ensure that each aspect of the emerging Local Plan is considered, including policies and site allocations, as well as the interrelationships between topics and cumulative effects of the Plan as a whole.
- 5.2 In accordance with the SEA Directive and Regulations any likely significant effects are identified along with any mitigation measures necessary to address them. The IA does not therefore provide a narrative on the nature and significance of effects for each policy within the Local Plan, as a policy might not be relevant to a particular topic or is considered unlikely to have a significant effect.
- 5.3 The Draft Local Plan was subject to IA with the findings informing the development of the Draft Local Plan. An IA Report (July 2015) accompanied the Draft Local Plan on public consultation from 03 August to 25 September 2015. The comments received in relation to the IA Report and how they have been addressed are presented in Appendix X of this Report. As a result of responses received on the Draft Local Plan the Council has made a number of changes to the Plan in preparation for Publication stage (Regulation 19). These changes were screened (Appendix XI of this Report) and it was found that the majority of them are minor and do not significantly affect the findings of the previous IA work as they seek to provide further clarification or avoid repetition. This includes the deletion of some policies and merging of others. While the screening found that the majority of changes were minor and did not significantly affect the IA, it was considered appropriate to update the findings of the IA for the Local Plan Publication Version (Regulation 19), to reflect the proposed amendments including changes to policy numbers. The updated IA Findings were presented in Section 5 of the IA Report (Dec 2015) that accompanied the Local Plan Publication Version on Consultation in February 2016.
- 5.4 Following the Publication consultation, further changes have been made to the Plan. These changes have been screened in Appendix XI of this Report and do not significantly affect the IA findings as they seek to provide further clarification or avoid repetition. There have therefore been no further updates or revisions to the IA findings set out within this Section.

Vision, Aims and Objectives

- 5.5 A compatibility analysis of the Local Plan Vision and Objectives was carried out using the IA Framework in April 2015 and the updated in July 2015 to take account of subsequent changes. A summary of the findings is provided below with the detailed compatibility matrices provided in Appendix VII. The

analysis found that overall the Vision and Objectives are compatible with the majority of SA objectives.

- 5.6 The Vision is highly compatible with the majority of the IA Objectives, particularly those relating to Sustainable Economic Development and Sustainable Communities. It was also found to be compatible with Flooding, Biodiversity, Natural Environment, Historic Environment, and Culture and Tourism, as well as improving access to services, facilities and employment opportunities. No significant incompatibilities were identified. Uncertainty was identified in relation to waste, minerals and the water environment. The compatibility analysis suggested that the Vision could be strengthened by amending it to say, '**Sustainable** development and regeneration will be focussed in Telford, Newport' and 'new development and investment will provide a high quality of life for **all** those who live and work in and visit the area'.
- 5.7 Overall, the Local Plan Strategic Objectives which seek to support the Vision are considered to be compatible with the majority of IA Objectives. At a strategic level there are complex inter-relationships between the Objectives; some are wide reaching in their potential effects whilst others are neutral or not relevant because some plan objectives are very specific and therefore only relate to certain IA topics. Some uncertainties exist due to the high level nature of the Objectives and cannot be mitigated until more details are known at a later stage or lower level of the plan making process. These uncertainties generally arise against IA Objectives relating to the natural environment, particularly for Local Plan Objectives that seek to provide a certain type or level of development. The compatibility analysis suggested that there is the potential to strengthen the Local Plan with the inclusion of an additional objective under Aim 7 that seeks to minimise the impact of new development on natural resources and encourage their efficient use. This is particularly important with regard to water resources, which is identified as a key sustainability issue. Soil quality could also be included as part of this objective by seeking to retain high quality soils and best and most versatile agricultural land.

Policies and Site Allocations

Housing

SEA Directive Topics: Population & Human Health
NPPF paras 47 - 68

Relevant SA Objectives:

- SA Objective 4: Improve the supply and affordability of accommodation for all groups in areas of greatest need.
- SA Objective 5: Locate housing in areas with good accessibility to employment, services and amenities.

Appraisal of Local Plan Policies

- 5.8 Policy HO 1 has the potential for major long term positive effects on housing by helping to meet the objectively assessed needs of the borough through the provision of around 15,555 new homes up to 2031. There is also the potential for major long term positive effects through Policy HO 2 as it identifies site allocations to help deliver the overall level of growth during the plan period. Policy HO 2 supports the delivery of the site allocations in accordance with the housing trajectory and provides flexibility to increase the supply of sites if monitoring suggests that delivery is below the level required to maintain an adequate supply of deliverable sites. This will have positive effects by helping to ensure that housing needs continue to be met in the long term.
- 5.9 The Local Plan focuses new housing in the areas where there is greatest need, with spatial strategy Policy SP 1 identifying Telford as the main focus for growth and Policy SP 2 supporting Newport's role as a market town. Policy SP 3 seeks to ensure that an appropriate level of development is provided in rural areas to help meet the needs of rural communities but which reflect existing constraints, including lack of services/facilities and infrastructure. These policies will help to directly progress SA Objectives 4 & 5 with major long term positive effects on this topic.
- 5.10 Policy SP 4 sets out the Council's positive approach to considering development proposals in line with the NPPF, proactively working with applicants and communities jointly to find solutions which mean that proposals can be approved wherever possible. It also seeks to avoid delay to the approval of planning applications that accord with the policies in the Local Plan. Potential for minor long term positive effects on housing.
- 5.11 Local Plan policies seek to ensure that housing needs for all groups are met. Policy HO 4 seeks to provide an appropriate mix of housing types, sizes and tenures to meet a range of household needs as well as support the changing needs of households over time, including properties built to lifetime home standards. Policy HO 5 requires all residential development (including mixed schemes) over 11 dwellings, or where gross floorspace is greater than 1,000 sqms, to contribute towards meeting affordable housing needs. The spatial strategy will also ensure that these affordable homes are provided in areas that are accessible to services/facilities as well as public transport. There are Local Policies that support the delivery of specialist housing for older and other vulnerable people (Policy HO 7) and set out criteria for the delivery of housing within the rural area (Policy HO 10, 11 & 12). Policy HO 8 seeks to meet the accommodation needs of the gypsy and traveller community by supporting the provision of 32 permanent pitches over the plan period. It also provides flexibility to ensure that these needs are continued to be met if there are changes to the evidence. These policies have the potential for minor long term positive effects on this topic.
- 5.12 The Local Plan requires development to be designed to the highest possible standards, being informed and responding to local distinctiveness (Policy BE 1). It also seeks to promote diversity and choice through the delivery of a balanced mix of compatible buildings and uses. This will ensure

that new development is well-designed and good quality and will minimise potential impacts on the existing built environment.

Appraisal of Site Allocations

- 5.13 The preferred site options are all considered to have the potential for long term minor positive effects on housing through positive contributions to the provision of residential development. Given the size of the sites at; Land North of New Trench Road, Donnington (SHLAA ID 508 part of the Land at Muxton allocated site), and at Woodhouse, Priorslee (SHLAA ID 386), which have the potential to accommodate a large quantum of development, these sites are considered to have the potential for major long-term positive effects.

Synergistic and Cumulative Effects

- 5.14 Overall, the Local Plan will have major short to long term major positive cumulative effects on housing through the provision of new homes to meet the objectively assessed need of the borough during the life of the Plan. Housing will be focussed in the areas where it is needed most, while ensuring that an appropriate level of provision is made to meet the needs of the entire plan area. The plan seeks to ensure that a suitable mix of homes are provided to meet the needs of all people in the future and ensures that any new development is designed to the highest possible standards.
- 5.15 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities to have a major long-term positive cumulative effect on housing markets in the sub-region.

Interrelationships with other Topics

- 5.16 The provision of housing and associated delivery of services and facilities also has the potential for indirect positive effects on a number of other topics, which include economy and employment, health and equality, and transport and accessibility. Conversely, the delivery of housing also has the potential for negative effects on a number of topics, which include health and equalities, transport and accessibility, air quality, climate change, water resources, water quality, flooding, the natural environment, landscapes, cultural heritage and waste and recycling.

Economy and Employment

SEA Directive Topics: Population & Human Health
NPPF paras 18-22

Relevant SA Objectives:

- SA Objective 1: To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups.
- SA Objective 2: To reduce the number of people with difficulties accessing employment, education and training opportunities.
- SA Objective 3: To ensure an appropriate supply of employment land and starter business premises.
- SA Objective 12: To provide an environment that helps retain well-educated members of the work force.

Appraisal of Local Plan Policies

- 5.17 Policy EC 1 has the potential for major long term positive effects on the economy through allocating sites to help meet the employment needs of the borough during the life of the plan. In line with spatial strategy Policy SP 1 the majority of these sites are focussed in Telford, with some also identified in Newport in line with Policy SP 2. The Local Plan acknowledges that some business will need to expand during the plan period and that allocated sites may not suit all business requirements. Policy EC 2 therefore permits employment development on unallocated sites subject to a number of criteria, which includes that they are within or adjacent to the urban area. The Local Plan also seeks to meet the employment needs of the rural area as part of the Council's aim to protect and strengthen rural communities. Policy EC 3 supports the re-use of previously developed land for new employment development in the rural area as well as the conversion/re-use of redundant buildings and extension of existing sites subject to a number of criteria.
- 5.18 The Local Plan recognises the challenges that existing centres are facing with regard to changing consumer behaviour as a result of online shopping and car based out of centre retail development. Policy EC 4 sets out a hierarchy of centres and seeks to maintain and enhance their vitality and viability, making them the preferred locations for retail, office and leisure developments and for community facilities. Telford Town Centre is identified as the focus for retail and leisure development in recognition of its role as a principle town (Policy EC 5).
- 5.19 Local Plan policies seek to ensure that Market Towns and the District Centres continue to fulfil their primary role of providing convenient and accessible shopping facilities (Policy EC 6) as well as seeking to make centres more attractive to shoppers and business (Policy EC 4). Policy EC 9 seeks to support the evening and night-time economy while also trying to ensure that it is safe, balanced and socially responsible. It will be important to ensure that any new development in relation to the evening and night-time economy

respects the existing community and neighbouring uses. These policies have the potential for minor long term positive effects on the economy.

- 5.20 Local Plan Policy EC 7 seeks to avoid the loss of A1, A2, A3, A4 and community as well as commits the Council to working positively in ways to help support proposals for multi-use buildings. The Local Plan resists retail development in out of centre and edge of centre locations as this could undermine the vitality and viability of the shopping centres and market towns identified in the Policy EC 4. The policy provides flexibility to allow for development out of the centres if suitable areas within them cannot be identified, subject to a number of criteria.
- 5.21 The Local Plan recognises the contribution tourism makes to the economy and includes a policy that seeks to improve the links and connectivity between Southwater, Telford Town Park and the Ironbridge Gorge World Heritage Site (Policy EC 11). Policy EC 12 supports the development of new and improvements to existing leisure, cultural and tourism facilities. The plan also supports the development of tourist accommodation, which includes major hotels within or immediately adjacent to Telford Town Centre, Newport and Wellington Market Towns and the Ironbridge World Heritage Site (Policy EC 12). These have the potential for a long term positive effect on the economy.
- 5.22 Local Plan Policy C 11 supports proposals that seek to improve the coverage of broadband and mobile signals where the developments will lead to better access for businesses and residents. This has the potential for indirect long term positive effects on the economy through improving access to broadband and mobile signal for rural communities, allowing the potential start-up of rural businesses. Improved coverage would also allow more people to work from home, which could encourage new business start-ups and enhance access to employment opportunities for people in rural areas as well as less mobile residents of the borough.

Appraisal of Site Allocations

- 5.23 The majority of the preferred employment site options are located within the existing strategic employment areas of Central Telford, Hadley Park, Halesfield, and Hortonwood, with the potential for major long-term positive effects. Development at these locations can build on existing infrastructure and well established transport routes to improve access, particularly for more sustainable modes of public transport and walking and cycling routes. Further sites are identified at Newport, Donnington Wood, Shawburch and Nedge Hill to meet local needs, with the potential for minor long-term positive effects.
- 5.24 Development at a number of the preferred housing site allocations could result in the loss of existing employment land, with the potential for negative effects on the economy, sites include;
- Sutherland School, Gibbons Road (SHLAA ID: 118)
 - Beeches Hospital (SHLAA ID: 375)

- Woodhouse, Priorslee (SHLAA ID: 386)
- Former Phoenix Secondary School (SHLAA ID: 732)
- Part of the Land at the Hem (SHLAA ID: 379)

5.25 Whilst significant negative effects were identified within the individual appraisals for these sites against the SA Objective for Economy and Employment, the loss of existing employment is not considered to be significant at a strategic or borough level, and a number of the sites have already been vacated, some of which have been relocated elsewhere in the borough. The significant negative effects were primarily used as a means of differentiating between potential site options.

Synergistic and Cumulative Effects

- 5.26 Overall, the Local Plan will have major short to long term positive cumulative effects on the economy and employment through the provision of 76 ha of employment land during the life of the Plan. The Local Plan seeks to maintain and enhance existing centres and focuses new retail and leisure development according to the hierarchy of centres.
- 5.27 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities as well as the Marches Strategic Economic Plan¹⁰⁰ to have a major long term positive cumulative effect on the economy and employment for the sub-region.

Interrelationships with other Topics

- 5.28 The provision of employment has the potential for indirect positive effects on communities and health and transport and accessibility. However, there is also the potential for negative effects on a number of topics, which include communities and health, transport and accessibility, air quality, climate change and flooding, water resources and quality, natural environment, cultural heritage and waste and recycling.
- 5.29 The findings of the IA in relation to soil (considered further on in this section), found that proposed development will inevitably result in the loss of agricultural land within the borough. This loss is not considered significant with regard to the economy as the agriculture, forestry and fishing industry only makes up 0.9% of the total employment in the borough¹⁰¹. The Local Plan seeks to direct development onto areas of poorer agricultural land.

¹⁰⁰ The Marches Local Enterprise Partnership (2014) Strategic Economic Plan: Accelerating Growth through Opportunity.

¹⁰¹ Telford & Wrekin Council (Dec 2012) 2011 Census Update – Economy and Skills.

Health and Equalities

SEA Directive Topics: Population & Human Health
NPPF paras 69-78

Relevant SA Objectives:

- SA Objective 13: To improve the health and well-being of the population to meet the needs of the vulnerable and ageing population.
- SA Objective 14: To create opportunities for the community to reduce levels of obesity.
- SA Objective 15: To enable vulnerable people to live independently.
- SA Objective 16: To ensure urban design and layout contributes towards reducing the potential for crime.
- SA Objective 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.

Appraisal of Local Plan Policies

- 5.30 Development proposed in the Local Plan has the potential to affect health and equalities in a number of different ways. Policies that provide or support new development, including Policy HO 1 and EC 1, have the potential to have negative effects in the short term on health and wellbeing during construction, through increased levels of noise, light and air pollution. However, it is considered that there are suitable mitigation measures provided through policies and available at the project level to address potential short term negative effects during construction. Policy BE 1 requires new development to protect new and existing development from visual intrusion, noise, vibrations or pollution so that the living conditions of existing and future occupiers are not detrimentally affected. It will be important to ensure that residential and employment development occurs next to compatible land uses and if there are conflicts then appropriate mitigation is provided to address them.
- 5.31 Policies HO 1 and EC 1 have the potential for indirect long term minor positive effects on health and equalities by meeting the needs of the borough, improving accessibility to housing and employment as well as associated services and facilities. The Local Plan seeks to ensure that housing needs for all groups are met. Policy HO 4 seeks to provide an appropriate mix of housing types, sizes and tenures to meet a range of household needs as well as support the changing needs of households over time, including properties built to lifetime home standards. Policy HO 5 requires all residential development (including mixed schemes) over 11 dwellings or more, or where gross floorspace is greater than 1,000 sqms, to contribute towards meeting affordable housing needs. There are also Local Policies that support the delivery of specialist housing for older and other vulnerable people (Policy HO 7) and set out criteria for the delivery of housing within the rural area (Policy

HO 10, 11 & 12). Policy HO 8 seeks to meet the accommodation needs of the gypsy and traveller community by supporting the provision of 32 permanent pitches over the plan period. It also provides flexibility to ensure that these needs are continued to be met if there are changes to the evidence. These policies have the potential for minor long term positive effects on equalities through delivering a range of housing to meet the varied needs of the borough.

- 5.32 The Local Plan seeks to protect and enhance community infrastructure enable independent active lifestyles. Policy COM 1 seeks to protect and enhance existing social infrastructure and Policy COM 2 supports development that enhances cultural facilities. Any new community infrastructure must be provided in accessible locations which provide opportunities for access by a range of modes including walking, cycling and public transport as well as the provision of adequate parking infrastructure. The Local Plan also supports development that encourages investment that improves the quality of the infrastructure for arts, sports, museums, and leisure as well as creates facilities which are accessible and support and enhance local communities (Policy COM 2). It also supports development that will help to sustain and create cultural facilities and opportunities, including places of worship, cemeteries and crematoria, which will help people in the borough to develop a sense of belonging. These policies have the potential for long term positive effects on health and equalities.
- 5.33 Providing development in accessible locations, close to services / facilities, can promote more sustainable methods of travel, which can have potential positive effects for both health and equalities (Policies SP 1 & SP 2). Conversely, when development is located in remote or rural areas this can increase reliance on the private vehicle with the potential for minor negative effects on both health and equalities Policy SP 3).
- 5.34 Policy C 2 seeks to improve access to sustainable transport modes through a range of measures, which include funding an Area Wide Travel Planning approach; enhancement of local and strategic walking and cycling networks; enhancements to existing public transport services or providing new services and improving connectivity between development and public transport hubs. This will have positive effects on health by helping to encourage healthy lifestyles. While seeking to encourage the use of sustainable modes of transport the Local Plan also recognises the important of ensuring that there is appropriate parking provision alongside new development. Policies C 5 and C 6 will help to ensure that there is sufficient parking to meet the needs of residents who are not able to use sustainable transport modes to access new development as well as visitors to the borough. Potential for indirect positive effects on health and equalities.
- 5.35 The findings of the IA under transport below, found that it may be difficult to encourage a change from private vehicle to public transport use. There is poor connectivity between the southern residential areas and Telford and the hospital in the north. The Local Plan should seek to improve the public transport connections between the north and south of the town, particularly with regard to the hospital.

- 5.36 The Local Plan seeks to protect and enhance the provision of open space and recreational facilities. Policy NE 4 requires new development to make quantitative and/or qualitative improvements to the provision of open space as well as sports and recreation facilities. This along with the protection and enhancement of Green Infrastructure (GI) in Policies NE 5, and NE 6 will have long term positive effects on health.
- 5.37 There is also the potential for indirect positive effects on equalities through Policy C 11, which supports proposals for the improved coverage of broadband and mobile signals. Improved coverage for residents of the borough will allow more people to work from home and help to reduce inequalities in rural areas.

Appraisal of Site Allocations

- 5.38 None of the preferred site options are considered to have the potential for significant negative effects on health, wellbeing and equalities through conflicting neighbouring land uses or negative effects on amenity. All of the sites (except for SHLAA ID: 508 which forms part of the Land at Muxton site allocation) are considered to have reasonable access to either public footpaths and / or cycle routes to promote active lifestyles. A number of the sites were found to be beyond reasonable walking distances to recreational areas with the potential for minor negative effects on health and wellbeing, these include:
- Three of the sites that form part of the Land at the Hem, Telford site allocation (SHLAA ID's: 229, 605 and 606)
- 5.39 Given the mitigation provided through the Local Plan, it is considered likely that open space needs will be met through development expectations outlined in the Plan and its policies, either on or off site, and as such is unlikely to result in significant negative effects at the strategic or borough level.
- 5.40 The preferred site allocations that are closer to existing facilities, services and sustainable transport modes are more likely to have positive effects on health and equalities.

Synergistic and Cumulative Effects

- 5.41 The Local Plan supports the delivery of new housing, employment and community infrastructure to meet the needs of all residents in the borough. The Council seeks to provide a balanced approach to transport that encourages the use of sustainable transport modes and healthier lifestyles but also recognises that the needs of all residents and visitors need to met. The protection and enhancement of open space and recreational areas will also help to improve the health of residents. The Local Plan has the potential for a major long term positive cumulative effect on health and equalities.
- 5.42 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities as well as the Telford & Wrekin Council's Community

Strategy¹⁰² and Health and Wellbeing Strategy¹⁰³ to have indirect minor long term positive cumulative effect on the health and equalities.

Interrelationships with other Topics

- 5.43 Health and equalities can be indirectly affected by the nature and significance of effects on the majority of other topics considered through the IA. Positive effects on housing, employment and transport and accessibility can lead to indirect positive effects on health, equalities and communities. Air quality, water resources, water quality, flooding, biodiversity and natural resources, waste, and cultural heritage can also either positively or negatively indirectly affect health.

Transport and Accessibility

SEA Directive Topics: Population & Human Health
NPPF paras 29-41

Relevant SA Objectives:

- SA Objective 9: To make travel more reliable and efficient, as well as enhance access to jobs, education, healthcare, shops and leisure.
- SA Objective 10: To work with other service providers to enable the timely provision of community facilities to accord with the delivery of new houses.
- SA Objective 11: To achieve a population profile in balance with the employment opportunities that the travel to work area is able to provide.

Appraisal of Local Plan Policies

- 5.44 The Local Plan proposes the delivery of around 15,555 homes during the life of the Plan of which the majority is either already completed (3,243 dwellings from 2011 to 2015) or currently has planning permission or a resolution to grant permission (9,310 dwellings). That leaves approximately 3,500 new homes to be delivered and a reduced level of growth than what was considered through the transport modelling work. This along with the delivery of around 76 ha of employment land (Policy EC 1) has the potential to increase levels of traffic on the existing highway network, which is already at or near capacity in some areas. Without suitable mitigation there is the potential for major long term negative effects on this topic.
- 5.45 The Council has carried out a range of transport modelling to determine how traffic patterns and problems in Telford are likely to change over the next 20 years. The initial Stage 1 transport modelling for the Local Plan was carried out in April 2013 to inform the development of the Strategy & Options document that went out to consultation in June 2013. Further modelling

¹⁰² Telford & Wrekin Council (2013) Shaping our Future – Telford & Wrekin's Journey to 2020.

¹⁰³ Telford & Wrekin Council (2013) Health and Wellbeing Strategy 2013/14 to 2015/16.

(Stage 2) was then carried out in 2014 to consider the proposed levels of development being put forward as part of the Shaping Places Proposed Housing and Employment Sites document (2014). This Stage 2 modelling work has now been refined to take account of the final list of developments to arise as a result of the consultation on the Proposed Housing and Employment Sites document in 2014. It considers the cumulative impact of proposed development on the highway network, identifies the problem areas and proposes appropriate mitigation.

- 5.46 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 further 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.
- 5.47 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 Plan¹⁰⁴, which seeks to employ a plan led approach for new developments to mitigate any transport impacts. To help 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 impact¹⁰⁵.
- 5.48 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. The financial contributions will be made through Section 106 agreements with the Council; however, it is important to note that the contribution strategy is being developed in a flexible manner so that it can be adjusted to accord to the Community Infrastructure Levy (CIL) guidance. The steps in the methodology are as follows:
- Traffic generated by all developments is assigned to the 2035 highway network allowing for all committed developments.
 - Areas of network overload, considering both link and junction capacity, are identified and the resulting set of mitigation measures is identified and costed.
 - For each individual mitigation scheme, the percentage of traffic from each of the individual developments affecting that location is identified

¹⁰⁴ Telford & Wrekin Council (2011) Local Transport Plan 2011-2026.

¹⁰⁵ Prepared by Pell Frischman on behalf of Telford & Wrekin Council (Feb 2015) Telford Future – Shaping Places. Shaping Places Report. Draft Final.

as a proportion of the total flow that impact on that mitigation. The total scheme cost is broken down into per-trip cost.

- 5.49 The Council has prepared an Infrastructure Delivery Plan (IDP) to set out the infrastructure requirements to support the proposals in the Local Plan. It ensures that new developments will be properly supported by the necessary transport infrastructure. Local Plan Policy C 3 seeks to manage the strategic impacts of development on the highway network. The policy expects developers to assess the cumulative impact of developments using the Telford Strategic Transport Model (TSTM) and work with both Highways England and the Council to ensure that the cumulative impact of new developments on the transport system are mitigated in a co-ordinated and plan led manner. It also expects them to fully mitigate the local and non-strategic impacts of developments which may include individual commuted sums to be specified by the local highway authority.
- 5.50 It is considered that the mitigation strategy proposed, which includes the contributions strategy as well as Local Plan Policies, should ensure that there are no significant negative effects on the highway network as a result of proposed development. The Local Plan seeks to locate development in a manner that reduces the need to travel by car and minimises the impacts on the existing highway (Policy C 3). Local Plan Policy C 1 will also help to reduce the potential negative effects on traffic, as it seeks to improve access to sustainable transport modes which will help to reduce the need to travel by car. This has the potential for long term positive effects on this topic through a range of measures, which include funding an Area Wide Travel Planning approach; enhancement of local and strategic walking and cycling networks; enhancements to existing public transport services or providing new services and improving connectivity between development and public transport hubs.
- 5.51 Other policies that have the potential for positive effects include Policies C 4 & C 5, which seek to ensure roads and streets and cycle and car parking are of a high quality design. Policy BE 1 also requires development to be designed to the highest possible standard, creating places that encourage active lifestyles through the provision of a network of walking and cycling facilities that connect different uses.
- 5.52 The Local Plan (Policies SP 1 & 2) 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. Policy COM 1 seeks to ensure that existing infrastructure is protected and enhanced, while Policy COM 2 supports the provision of new community infrastructure to meet the additional needs of proposed growth.
- 5.53 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. A key challenge for the Local Plan will be to try and improve accessibility to public transport modes and improve the links between the south and north of Telford. Encouraging the shift from the private vehicle to public transport modes will be difficult. The Local Plan should not only be seeking to improve access to public transport networks but should also try and balance the provision of new employment and key services within the Town. The Local Plan should also be seeking where possible to improve public transport links from the rural areas into the centres of Telford and Newport.

Appraisal of Site Allocations

- 5.54 It is considered that development at any of the site options has the potential to negatively affect traffic and the surrounding road network. Those sites located the closest to existing services, facilities, employment opportunities and sustainable modes of transport are considered to have the potential to reduce the significance of these negative effects. Most of the sites are within reasonable walking distance to bus or rail connections, however the following sites are beyond reasonable walking distance to both bus and rail connections with the potential to increase reliance on the private vehicle:

- Plot D, Pool Hill Road, Dawley (SHLAA ID: 372)
- The Former Swan Centre, Grange Avenue, Stirchley (SHLAA ID: 912)
- Two sites that form part of the Land at the Hem, Telford site allocation (SHLAA ID'S: 229 and 606)
- Old Park 2 (SHLAA ID: 488)

- 5.55 Mitigation provided through the Local Plan, and the Local Transport Plan should ensure that effects are not significant. Project level mitigation should ensure that development at The Charlton School, Severn Drive, Dothill (SHLAA ID: 748) does not exacerbate traffic constraints along the A5223, and development at Land at Muxton (SHLAA ID's: 144, 482, 504 and 508) does not exacerbate traffic constraints around Clock Tower Roundabout.

Synergistic and Cumulative Effects

- 5.56 Local Plan policies seek to address the impacts of proposed development on the road network and ensure that appropriate infrastructure is provided. The proposed plan led contribution strategy will ensure that appropriate infrastructure is delivered so that there are no significant negative effects on transport. Local Plan policies also seek to enhance existing and provide new public transport and pedestrian routes as well as encourage the use of sustainable transport modes. These measures along with the delivery of housing, employment and community facilities/ services has the potential for a long term positive cumulative effect on transport and accessibility.

- 5.57 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities as well as the Telford & Wrekin Local Transport Plan¹⁰⁶. At this stage the inter-plan cumulative effects are uncertain as while there is the potential for negative effects through increased traffic as a result of proposed development there is also the potential for significant improvements to sustainable transport modes as well as accessibility to housing, employment and community facilities/services.

Interrelationships with other Topics

- 5.58 Positive effects on transport and accessibility can lead to indirect positive effects on communities and health. There is also the potential for indirect positive effects on environmental topics such as air and water quality. Conversely, when there are negative effects on transport and accessibility there is the potential for indirect negative effects on the same topics.

Air Quality

SEA Directive Topics: Air
NPPF paras 109-125

Relevant SA Objectives:

- SA Objective 22: To reduce annual CO2 emissions by 60% from 1990 levels, by 2050 (36% by 2026).

Appraisal of Local Plan Policies

- 5.59 The main sources of air pollution in the borough are emissions from busy roads, particularly along the Ironbridge Gorge and also from emissions from the power station at Ironbridge¹⁰⁷. At this time, air quality is not a significant issue within the borough as National Air Quality Objectives are currently being achieved. However, this does not mean that there is not the potential for it to become a more significant issue during the life of the plan.
- 5.60 The nature and significance of effects with regard to air quality are closely linked to the appraisal for traffic and transport, which found that there are not likely to be any significant negative effects on traffic as a result of proposed development. The Council is proposing a comprehensive mitigation strategy to address the individual and cumulative impacts of proposed development on traffic. This along with Local Plan Policies that seek to improve connectivity and enhance access to sustainable transport modes as well as facilities / services should help to ensure that there are no significant negative effects on air quality.

Appraisal of Site Allocations

¹⁰⁶ Telford & Wrekin Council (2011) Local Transport Plan 2011-2026.

¹⁰⁷ Telford & Wrekin Authority Council, 2009: LAQM Updating and Screening Assessment 2009

- 5.61 The appraisal found that the majority of the preferred site allocations have the potential for negative effects of varying significance in relation to access to existing services, facilities and sustainable transport modes, and as such are unlikely to alleviate the need for a private vehicle. Development at any of the sites is therefore considered to have the potential for indirect minor negative effects on air quality. Sites that are within reasonable walking distance to services, facilities, employment opportunities and sustainable transport modes are considered to have the potential to reduce the need to travel, and therefore have the potential for a neutral effect on air quality.

Synergistic and Cumulative Effects

- 5.62 It is considered that major negative effects on air quality are unlikely as a result of the Local Plan. Policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes. While there may be some localised impacts in the short-term as a result of proposed development, the mitigation proposed through the transport mitigation strategy and Local Plan Policies will ensure that these are not significant.
- 5.63 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities as well as the Telford & Wrekin Local Transport Plan¹⁰⁸. At this stage the inter-plan cumulative effects are uncertain as while there is the potential for negative effects through increased traffic as a result of proposed development there is also the potential for significant improvements to sustainable transport modes as well as accessibility to housing, employment and community facilities/services.

Interrelationships with other Topics

- 5.64 Air quality is closely linked with transport and accessibility as increased levels of traffic can result in increased levels of atmospheric pollution, poor air quality has the potential for indirect long-term negative effects on health, climate change and the natural environment / ecosystems. Alternatively when air quality is improved, this has the potential for indirect positive effects on the same topics.

¹⁰⁸ Telford & Wrekin Council (2011) Local Transport Plan 2011-2026.

Climate Change and Flooding

SEA Directive Topics: Climatic Factors
NPPF paras 93-104

Relevant SA Objectives:

- SA Objective 23: To deliver a built environment that is well adapted to cope with the changing weather conditions that are forecast.
- SA Objective 24: Incorporate measures into development proposals that contribute towards a reduction in flood risk aimed at providing a runoff rate less than greenfield rates.

Appraisal of Local Plan Policies

- 5.65 The Local Plan, in particular Policies HO 1 and EC 1, have the potential to negatively affect climate change by; increased atmospheric pollution (as a result of increased traffic and road users), increased waste (particularly waste sent to landfill), and an increase in energy supply and demand (relating to energy from unsustainable sources both in construction and operation). There are a number of other issues related to climate change, including flooding and the loss of green infrastructure, which are addressed under separate topics below.
- 5.66 Policies that support growth and the delivery of residential and employment development have the potential increase the levels of traffic in the borough and therefore increase levels of greenhouse gas emissions with negative effects on climate change. However, given the findings of the IA for the transport and accessibility and air quality topics above, it is considered unlikely that Local Plan policies will have significant negative effects on climate change through increased greenhouse gas emissions. Please refer to the transport and accessibility and air quality topics above.
- 5.67 There is also the potential for negative effects through the embodied energy inherent in the construction and maintenance of development. Processing methods and technologies are likely to improve reducing the amount of embodied energy used; however this is uncertain. There are a number of Local Plan policies that seek to improve energy efficiency and support low carbon and renewable energy, which have the potential for a long-term positive effect on climate change.
- 5.68 Local Plan Policy ER 1 requires all development to mitigate and adapt to climate change and reduce greenhouse gas emissions. Wherever feasible, the Policy seeks that development should include decentralised energy production or connection to an existing Combined Heat and Power or Community Heating System as well as enable commercial, community and domestic scale renewable energy generating schemes. It also supports proposals for renewable and low carbon energy schemes as well as encourages existing developments to adapt to climate change by including green roofs, micro-renewable energy, recycling facilities, building efficiency

measures and cycle parking. Local Plan Policy BE 1 requires development to be designed to the highest possible standard and ensures places are designed in a sustainable way by taking active and passive measures to reduce the need for non-renewable energy.

- 5.69 Given the support for renewable and low carbon energy development set out in the Local Plan as well as the NPPF, it is considered that there will not be significant negative effects on climate change.
- 5.70 Climate change adaptation and in particular flooding is a significant issue for most areas in the UK. A Stage 2 Strategic Flood Risk Assessment (SFRA) was produced in 2008¹⁰⁹, the findings showed that in most areas Flood Zones 2, 3a and 3b are fairly narrow and there is little difference in flood extent between each of these events. It states that it is important for these flood risk affected areas to remain open space. The Detailed Water Cycle Study¹¹⁰ (2014) found that development in the borough is subject to flood risk from a range of sources: fluvial, groundwater, surface water runoff and reservoirs. Based on the findings of the WCS Scoping Study and SFRA the Detailed WCS finds that fluvial flooding is not a significant issue within the borough. The most widespread flooding issue affecting development is flooding caused by surface water runoff after heavy rainfall events.
- 5.71 The Council as the Lead Local Flood Authority (LLFA) under the Flood and Water Management Act (2010) has a responsibility to develop, maintain, apply and monitor a strategy for local flood risk management for the borough. A Local Flood Risk Management Strategy (LFRMS) has been prepared for the borough¹¹¹. According to the LFRMS the most significant risks in terms of fluvial flooding are:
- The Humber Brook (North Telford);
 - Lyde Brook and Coal Brook (South Telford) affecting the Gorge parish;
 - River Strine (Rural East) and River Roden and River Tern (Rural West) affects Rodington and Waters Upton areas.
 - Wesley Brook presents a minimal fluvial flood risk to properties within the borough; however, there is significant risk to properties in Shifnal downstream in Shropshire.
- 5.72 The LFRMS also states that there is a direct correlation between the numbers of affected properties and the increased urbanisation of the Telford North and South catchments in terms of fluvial flooding. It found that there is greater risk from fluvial flooding in the North and South Telford catchments, which is not surprising given their urban nature. Whilst flooding from groundwater is not common in the borough; however, some areas are known to be affected by a high water table. The LFRMS acknowledges that currently the understanding of the risk of groundwater flooding is limited. The LFRMS sets out 23 Flood Risk Policies, which aim to ensure that existing

¹⁰⁹ Produced by Halcrow on behalf of Telford & Wrekin Council (2008) Strategic Flood Risk Assessment Level 2, Final.

¹¹⁰ Produced by Amec on behalf of Telford & Wrekin Council (2014) Detailed Water Cycle Study, Final Report.

¹¹¹ Telford & Wrekin Council (2015) Draft LLFA Flood Risk Management Strategy.

flood risk is properly managed, and that the impacts of any future risk as a result of future development and climate change are effectively mitigated. The policies also promote the protection of existing and where possible the creation of new natural habitat.

- 5.73 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, which has the potential for a long term positive effect. Policy ER 12 expects new development to comply with the following criteria:
- Ensure development proposals are located in accordance with the Sequential Test and Exception Test (where appropriate) and also have regard to both the Strategic Flood Risk Assessment update and Local Flood Risk Management Strategy (LFRM) where appropriate;
 - Provide detailed schemes for on-site management of surface water run off which are designed to the greenfield / brownfield run off rates as set out in the current 'Local Flood Risk Management Plan';
 - Demonstrate that all new development, where flooding has been identified, reduces flood risk through the inclusion of appropriate flood storage compensation measures and seeks opportunities for flood risk reduction measures to enhance the local flood risk regime;
 - Ensure that all Sustainable Urban Drainage Systems serving residential developments are designed to provide an additional modelling allowance dependant on the housing density to cater for future Urban Creep;
 - Demonstrate that where Sustainable Urban Drainage systems have been provided that there is a management and maintenance plan in place for the lifetime of the development which shall include arrangements, including financial, for adoption by any public authority or statutory undertaker;
 - Demonstrate no loss of open watercourse with culverts being opened up where possible to improve drainage and flood flows. Proposals involving the creation of new culverts (unless essential to the provision of access) will not be permitted;
 - Demonstrate proposals should help to conserve and enhance watercourses and riverside habitats, where necessary through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of the aquatic environment; and
 - Ensure that discharge locations have capacity to receive all foul and surface water discharge from developments with regard to the following hierarchy:
 1. Ground infiltration;
 2. Water body;
 3. Surface water sewer.
- 5.74 Given the policy mitigation above and the LFRMS, it is considered unlikely that the development proposed through the Local Plan will have significant negative effects on flooding through the introduction of increased impermeable surfaces.

Appraisal of Site Allocations

- 5.75 The appraisal has found that the majority of the preferred site options have the potential for negative effects of varying significance in relation to access to existing services, facilities, employment opportunities and sustainable transport modes, and as such are unlikely to alleviate reliance on the private vehicle. Development at these sites is considered to therefore have potential for indirect negative effects on air quality and therefore climate change. A number of the preferred sites are located on greenfield land with the potential for severance of green infrastructure, this may have indirect cumulative negative effects for climate change.
- 5.76 The majority of the preferred sites are not located within an area of flood risk, and are unlikely to affect flood risk in the wider catchment, with the potential for a neutral effect. The following sites are located partially within a flood risk area:
- Two sites that form part of the Land at the Hem (SHLAA ID's: 229 and 606)
 - Two sites that form part of the Land at Muxton (SHLAA ID's: 482 and 508)
- 5.77 These sites have the potential for minor negative effects on flood risk, however mitigation provided through the Local Plan (in particular Policy ER 12), National policy, and available at the project level, should ensure that the effects are not significant, it is likely that development at these site options will be directed away from any area of flood risk.

Synergistic and Cumulative Effects

- 5.78 Local Plan Policies seek to address the impacts of proposed development on the road network and improve public transport and pedestrian routes. While there may be some localised increase in greenhouse gas emissions in the short-term as a result of proposed development, the mitigation proposed through the transport mitigation strategy and Local Plan Policies will ensure that these are not significant.
- 5.79 There is also the potential for the Local Plan to have negative cumulative effects through the embodied energy inherent in the construction and maintenance of development. Processing methods and technologies are likely to improve reducing the amount of embodied energy used; however this is uncertain. There are a number of Local Plan policies that seek to improve energy efficiency and support low carbon and renewable energy, which have the potential for a long-term positive cumulative effect on climate change.
- 5.80 Local Plan policies require new development to provide detailed schemes for the management of surface water runoff in line with the LFRMS as well as set specific run off rates and the incorporation of Sustainable Urban Drainage Systems. It is considered that the cumulative effect of the Local Plan will be neutral on flooding given the mitigation measures available. There is an element of uncertainty as this is dependent on the implementation of mitigation measures.

- 5.81 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities that are also proposing development. In the short-term there are likely to be negative cumulative effects on climate change; however, there is the potential for positive effects in the longer term. The cumulative effect of the Local Plan with other Plans and Programmes is likely to be positive in the long term for flooding.

Interrelationships with other Topics

- 5.82 The nature and significance of effects on climate change and flooding is closely linked to housing, employment and transport. Flooding is also closely linked to communities and human health as well as water quality. Increased flood risk can have negative effects on human health as well as indirect negative effects on water quality and the economy.

Water Resources and Quality

SEA Directive Topics: Water
NPPF paras 109-125

Relevant SA Objectives:

- SA Objective 8: To minimise demand upon water resources and to enable the timely provision of adequate waste water treatment to support increased housing provision.

Appraisal of Local Plan Policies

- 5.83 Development proposed in Local Plan Policies HO 1 and EC 1 has the potential to have negative effects on water resources and water quality through increased abstraction and increased waste water. It also has the potential to decrease water quality through increased surface water run-off and the associated polluting effect.
- 5.84 The borough primarily falls within the Shelton Water Resource Zone (WRZ) and Whitchurch and Wren WRZ. The spatial strategy set out in Policies SP 1, 3 & 4 will result in the majority of growth proposed through Local Policies HO1 and EC 1 being located within the Shelton WRZ. The Severn Trent Water Resource Management Plan¹¹² (WRMP) identifies that the supply in the Shelton WRZ is due to suddenly 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.
- 5.85 The WRMP seeks to address this issue and increase the volume of water available for supply through a number of measures, which include pipeline

¹¹² Severn Trent Water (2014) Final Water Resource Management Plan. Available online: <http://www.severntrent.com/future/future-plans-and-strategy/water-resources-management-plan>

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. A Detailed Water Cycle Study¹¹³ (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. 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.

- 5.86 As is the case nationally, the evidence demonstrates that increased pressure on water resources is a key issue for the borough and surrounding areas. While the WRMP sets out measures to ensure that there is sufficient water available for future supply, there are a number of uncertainties with regard to their delivery. The WCS recommends that per capita consumption across the borough needs to be effectively managed to a level of around 110 litres per person per day. It also encourages the Council to take opportunities to promote Severn Trent Water's free metering programme and water efficiency advice to residents across the borough.
- 5.87 The Local Plan seeks to promote water sensitive design in new development in order to make a positive contribution to the security of water supplies in the Shelton WRZ. Policy ER 10 expects developers on schemes of 10 or more homes or 1,000 sqm of non-housing to demonstrate that they have incorporated design features that will reduce water consumption and supporting the recycling/ re-use of water through measures such as rainwater harvesting and grey water recycling. It also expects them to demonstrate that they provide features for the collection of rainwater for use in irrigation / watering to offset potable water demand.
- 5.88 The available evidence, including the Severn Trent WRMP and Detailed WCS, indicate that there are existing and future constraints with regard to water resources. In line with the Detailed WCS, it is recommended that as a minimum Local Plan Policy ER 10 should require developers to demonstrate that water consumption in the development will be managed at a level of 110 litres per person per day. While it is acknowledged that the Detailed WCS considered a higher level of growth than is currently proposed in the Local Plan, it is considered that a precautionary approach should be taken to allow for flexibility in the Plan, should the overall level of growth need to increase in the future as a result of new or updated evidence. It is also recommended that Policy ER 10 is linked to the phasing of proposed developed set out in Policy HO 3. The phasing of development will be a key factor in helping to ensure a secure supply-demand balance.
- 5.89 Given the current regulatory process in place, such as the WRMP and abstraction licensing, as well as mitigation provided by Local Plan policies, it is considered unlikely that there will be significant negative effects on water resources. However, there is still the potential for a long term minor negative

¹¹³ Telford and Wrekin Council (2014) Detailed Water Cycle Study Final Report.

effect. The incorporation of the recommendations above should help to reduce the significance of the negative effect further; however, the residual effects are uncertain at this stage, as this will be dependent on the effective implementation of mitigation measures.

- 5.90 In line with the recommendations of the WCS, the Council should take the opportunity, where possible, to support education initiatives that seek to inform residents about water efficiency and potentially reducing daily consumption.
- 5.91 Severn Trent Water provides wastewater and sewerage services across the borough with a number of Waste Water Treatment Works (WwTW) serving various catchments within the plan area. The Detailed WCS (2014) examined nine WwTWs that serve areas in which strategic growth was being planned in the borough. It found that the overall level of constraint, taking into account current ecological status under the WFD, for the nine WwTWs is as follows:
- Very high for the Newport, Coalport, Waters Upton and Crudgington WwTWs;
 - Moderate to high for the Rushmoor and High Ercall WwTWs;
 - Moderate for the Edgmond and Sambrook WwTWs; and
 - Low for the Monkmoor WwTW.
- 5.92 It 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 (Policy SP 1) during the life of the plan. This will result in the majority of 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 the level of growth set out in Policies HO 1 and EC 1; however, this capacity does not align with the spatial strategy set out in the Local Plan (Policies SP 1 & 3). Based on the findings of the WCS, it appears that there is currently not enough capacity at the majority of WwTWs to accommodate the level of growth proposed in Policies HO1 and EC 1. However, it should be noted that through the work undertaken for the WCS, Severn Trent Water confirmed that there will be capital maintenance work and, as required, capacity increase at WwTWs to cater for future growth¹¹⁴.
- 5.93 Policy ER 11 seeks to avoid adverse impacts of additional demand on the foul sewerage network and expects developers to demonstrate the following:
- How foul flows produced by the development will be drained and identification of the agreed point of connection to the public foul sewerage network;
 - How development will be phased to allow Severn Trent Water sufficient time to undertake any necessary capacity improvement works to the public foul network or to existing waste water treatment works prior to construction and occupation of developments; and

¹¹⁴ Ibid.

- How any development adjacent to water bodies covered by the Water Framework Directive will contribute towards those water bodies maintaining or achieving Good Ecological Status. This may take the form of on-site measures, a financial contribution to off-site measures or where viable seeking a more appropriate location for development.
- 5.94 The phasing of growth will be key to ensuring that the necessary improvements to WwTWs and the sewerage network can be made to provide sufficient capacity. The supporting text of Policy ER 11 acknowledges this and states that strategically phasing development across the course of the plan will allow Severn Trent Water and other statutory undertakers to incorporate improvements into Asset Management Plans delivering key infrastructure in advance of development. It also states that regular reviews of the Infrastructure Delivery Plan will also help provide Severn Trent Water with information on any changes to the phasing of development in a more timely fashion allowing opportunities to re-deploy resources to better meet the needs of emerging development patterns. To help strengthen the plan, it is recommended that Policy ER 11 is linked to the phasing of proposed development set out in Policy HO 3. The Council is intending to take a plan rather than development led approach with regard to water quality, allowing the Council, Severn Trent Water and the EA to assess any potential water quality issues in advance of applications and develop appropriate mitigating measures.
- 5.95 Local Plan Policy ER 12 relates to the effective on-site management of surface water and expects developers to provide detailed schemes for the management of surface water runoff as well as criteria for the provision of Sustainable Urban Drainage Systems. The Policy also expects developers to ensure that discharge locations have capacity to receive all foul and surface water discharge from developments. Any development that is adjacent to a surface water body or providing new features as part of development, developers must ensure they are multi-functional and enhance the hydrology, ecological, visual and recreational value of the water body.
- 5.96 Existing regulatory processes, such as discharge licensing and the WFD, as well as mitigation provided through Local Plan policies, should ensure that there are no significant negative effects on water quality. However, the residual effects are uncertain at this stage, as this will be dependent on the effective implementation of mitigation measures.

Appraisal of Site Allocations

- 5.97 Of the preferred site options, only two have uncertainties in regards to waste water treatment provision, these are: (SHLAA ID's: 900 and 912)
- The Former Swan Centre, Grange Avenue, Stirchley (SHLAA ID: 912)
- 5.98 The rest of the preferred site options are located either within Coalport Waste Water Treatment Works (WwTW), Newport WwTW or Rushmoor WwTW. Coalport and Newport WwTWs have been identified as very highly constrained, whilst Rushmoor is identified as moderately to highly constrained.

Development at the site options therefore is likely to increase constraints on waste water facilities with the potential for minor negative effects on water quality. However, mitigation provided through the Local Plan, including the appropriate phasing of development needs, should ensure that the necessary capacity can be met.

Synergistic and Cumulative Effects

- 5.99 Overall, there is the potential for the Local Plan to have major long term cumulative negative effects on water resources and quality. Mitigation provided through Local Policies and current regulatory processes, such as the WRMP and discharge licenses, should help to ensure that negative effects are not significant but this is uncertain at this stage. There are a number of assumptions and uncertainties in relation to the potential future supply of water and capacity of wastewater infrastructure within and surrounding the plan area. Strong policies and effective co-operation and close involvement with the EA and Severn Trent Water will be vital to ensure that there are no major negative effects. The Council and Local Plan must be flexible in terms of the level and location of growth in the future and ensure that appropriate monitoring is in place to indicate if tipping points have been reached.
- 5.100 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities that are also proposing development. There is the potential for major long term negative cumulative effects on the water environment.

Interrelationships with other Topics

- 5.101 The water environment is influenced by and affects a number of the topics considered through this SA. Potential negative effects on water resources and quality can also have indirect negative effects on communities and human health and the natural environment. Similarly, improvements to water resources and quality can also have benefits for these topics. Given that the appraisal has found that there is not likely to be negative effects on the water environment, it is considered unlikely that there would be any major indirect negative effects on any other topics.

Landscape

SEA Directive Topics: Landscape
NPPF paras 109-125

Relevant SA Objectives:

- SA Objective 20: To manage the landscape effects of development in recognition of European Landscape Convention.

Appraisal of Local Plan Policies

- 5.102 The Shropshire Landscape Typology¹¹⁵ identified a number of different landscape types within the borough, which predominantly includes urban and estate farmland. It also identified areas of lowland moss to the North of Telford as well as small areas of principal settled farmlands, enclosed lowland heaths and sandstone estate land. To the south east of Telford there is wooded and wooded hills estate land as well as high volcanic hills and slopes. The north eastern tip of the Shropshire AONB extends into the borough for approximately 5 sq km on the Wrekin Hill, 3-5km to the south west of Telford. Located in the rural areas the borough also contains three strategic landscape areas, the Wrekin Forest, Weald Moors and Lilleshall gap.
- 5.103 Development proposed in the Local Plan, in particular through Policies HO 1 and EC 1, has the potential for negative effects on the landscape and landscape setting, as well as views and vistas to and from the designated areas. The Local Plan seeks to protect and enhance the most important areas for landscape within the borough, shielding them from all but the most essential forms of development, as well as seeking to maintain the intrinsic value of the countryside.
- 5.104 Local Plan Policy NE 7 has the potential for a long term positive effect on this topic as it seeks to protect and enhance strategic landscape as well as seeks to ensure that development does not degrade the quality of the local landscape. Alongside this, the plan also seeks to protect and enhance the natural environment by requiring development to integrate and optimise the application of Green Infrastructure (GI) as well as contributing to local and strategic open space needs (Policies NE 3, NE 4 and NE 5). The protection and enhancement of GI, including the Green Network, has the potential for positive long term effects on the landscape. The protection of existing trees, hedgerows and woodlands along with protection, provision and management of existing and new open space through Policies NE 2, NE 3 and NE 4 will also have indirect positive effects on the landscape.
- 5.105 The Local Plan proposes the delivery of around 15,555 homes during the life of the Plan of which the majority is either already completed (3,243 dwellings from 2011 to 2015) or currently has planning permission (9,310 dwellings). That leaves approximately 3,500 new homes to be delivered and along with the 76 ha of employment land (Policy EC 1). There is unlikely to be a significant level of growth within any of the identified strategic landscape areas, including the AONB, as the Local Plan seeks to shield them from development. The challenge will be in trying to ensure that the inevitable expansion of Telford and Newport as the main focus for development (Policies SP 1 & SP 2) does not significantly affect the setting of these important landscape areas.
- 5.106 It is considered that the mitigation provided through Local Plan policies and available at the protect level should ensure that the proposed level of growth does not have significant negative effects on the landscape. However, the level of growth proposed will ultimately lead to the loss of greenfield land surrounding Telford and Newport as well as within the countryside, changing the landscape to some degree, which has the

¹¹⁵ Shropshire County Council (2006) The Shropshire Landscape Typology.

potential for residual minor long term negative effects. The nature and significance of the effect will ultimately be dependent on the precise location, scale and design of development.

Appraisal of Site Allocations

- 5.107 The Landscape Sensitivity Study Update (2014) has identified that the following preferred sites are of medium to high sensitivity to housing development, with the potential for negative effects on landscape:
- Woodhouse, Priorslee (SHLAA ID: 386)
 - Land at the Hem (SHLAA ID's: 229, 605, 606, 607, 608, 379 and 612)
 - Land at Muxton, Telford (SHLAA ID's: 144 and 504)
- 5.108 Sites that were identified in this study as of medium to low sensitivity to housing development are:
- Land at Muxton, Telford (SHLAA ID's: 482 and 508)
- 5.109 The remaining preferred site options have not been subject to the Landscape Sensitivity Study Update, however the majority of them contain greenfield land, and as such development is considered to have the potential for a minor negative effect on landscape. Mitigation provided through the Local Plan, and available at the project level should however ensure that these effects are not significant. Development at the following sites would regenerate previously developed land with the potential for minor positive effects on townscape:
- Former Madeley Court School Site (SHLAA ID: 514)
 - The Former Swan Centre, Grange Avenue, Stirchley (SHLAA ID: 912)
- 5.110 None of the preferred site allocations are situated within or adjacent to the Wrekin AONB.

Synergistic and Cumulative Effects

- 5.111 The overall level of growth proposed in the Local Plan is unlikely to have significant negative cumulative effects on the landscape taking mitigation into account. Local Plan policies direct development away from and seek to protect and enhance important landscape areas. Proposed development is likely to result in the loss of greenfield land surrounding Telford and Newport as well as within the wider countryside. This will change the landscape to some degree with the potential for minor long term cumulative negative effects; however, there is also an element of uncertainty. Maintaining and improving GI, open space and the wider Green Network all have the potential to help reduce the negative effects of proposed development.

- 5.112 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities that are also proposing development. There is the potential for a long term negative cumulative effect on the landscape.

Interrelationships with other Topics

- 5.113 The landscape is influenced by and affects a number of the topics considered through the IA. Potential negative effects on the water environment, air quality, biodiversity, heritage and soil can also have indirect negative effects on the landscape. Changes to the landscape can affect communities and health both positively and negatively.

Biodiversity

SEA Directive Topics: Biodiversity, Flora and Fauna
NPPF paras 109-125

Relevant SA Objectives:

- SA Objective 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.
- SA Objective 18: To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.
- SA Objective 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.

Appraisal of Draft Local Plan Policies

- 5.114 The borough contains a number of sites that are designated for their biodiversity importance, including 8 Sites of Special Scientific Interest (SSSIs), 4 of which are designated for geological interests, as well as a number of Local Nature Reserves (LNRs) and Local Wildlife Sites (LWSs). The majority of SSSIs and a number of LWSs are situated to the east, south and south west of Telford.
- 5.115 The Local Plan proposes the delivery of around 15,555 homes during the life of the Plan of which the majority is either already completed (3,243 dwellings from 2011 to 2015) or currently has planning permission (9,310 dwellings). That leaves approximately 3,500 new homes to be delivered and along with the 76 ha of employment land (Policy EC 1). The spatial strategy (Policies SP 1 to SP 3) directs the majority of this growth towards Telford and Newport, with development also allowed in rural areas to ensure the needs of rural communities are met. Policies SP 3 and EC 2 give preference to the use of previously developed land in rural areas and in the siting of employment uses on unallocated sites. There does not appear to be a similar preference with regard to the location of development in Telford (Policy SP 1) and Newport

(Policy SP 2). While brownfield site can be important for biodiversity it is generally greenfield sites that have greater value. It is recommended that there should be a similar preference for the use of previously developed land with regard to the location of development in Telford and Newport.

- 5.116 Given the findings of the IA for other topics, such as transport, air quality and water resources and quality, it is considered unlikely that there will be any major negative effects on biodiversity as a result of increased pollution. However, it is important to note that water resources and quality is a key issue for the borough and that close and effective working at a catchment level between relevant Local Planning Authorities, the EA and Severn Trent Water will be needed to ensure that there are no significant negative effects.
- 5.117 While there is the potential for negative effects through the loss of habitats as a result of the location of development, this is more appropriately addressed through the consideration of specific site allocations. The nature and significance of effects against this topic for the site allocations proposed under Policies HO 2 and EC 1 are considered under a different heading below.
- 5.118 One of the key negative effect likely to arise as a result of proposed development is related to the overall loss and fragmentation of habitats. Important habitat corridors should be protected and maintained as the connectivity of habitats is important for the long term integrity of biodiversity.
- 5.119 The Local Plan contains strong policies that seek to protect, maintain and enhance biodiversity and geodiversity. These include the following:
- Policy NE 1 expects development to provide opportunities to enhance or incorporate new biodiversity features through design, layout and landscaping as well as provide appropriate buffer zones between proposals and important biodiversity. Developments are expected to ensure that they are ecologically permeable through the protection and enhancement of existing and the provision of new continuous wildlife corridors, key ecological habitats and stepping stones, which shall be integrated and linked to wider GI.
 - Policy NE 1 seeks to protect designated sites for biodiversity and geodiversity by not permitting development that would harm, either directly or indirectly, any sites designated of national, regional or local importance. This includes SSSIs, LNRs, LWSs, RIGSs, Ancient and Semi-natural Woodland Sites or would cause harm to the population or conservation status of Biodiversity Action Plan Priority species and habitats. The Policy expects developments with the potential for impacts on designated sites and/ or BAP Priority Species or Habitats to provide detailed assessments (carried out by an experienced, and where necessary licensed ecologist) based on the conservation objectives or reasons for designation of the site and identifying any potential effect pathways and identifying mechanisms for avoiding and mitigating any impacts. Development on or affecting other non-designated sites or wildlife corridors with biodiversity value will only be permitted where it can be demonstrated that the need for development outweighs any harm

that might be caused and that adequate mitigation measures are available.

- Policy NE 2 seeks to protect and manage existing trees, hedgerows and woodlands, which can be important habitats as well as provide corridors for mobile species.

5.120 The Local Plan also seeks to protect and enhance the natural environment by requiring development to integrate and optimise the application of GI as well as contribute to local and strategic open space needs (Policies NE 4 and NE 5). The protection and enhancement of the Green Network (Policy NE 6) has the potential for long term positive effects on biodiversity through maintaining and enhancing connectivity. In addition, Policy ER 12 expects developers to demonstrate that a proposal conserves and enhances watercourses and riverside habitats where necessary through management and mitigation measures, which will also help to reduce the fragmentation of habitats and maintain connectivity.

5.121 There is also the potential for the level of growth proposed in Policies HO 1 and EC 1 to increase current levels of disturbance (noise, light and recreational).

5.122 Local Plan Policies NE 3, NE 4 and NE 5 seeks to maintain, enhance and protect the provision of formal and informal sports and recreation facilities and public open spaces throughout the borough. If development will lead to the loss of open space then developers will have to demonstrate that suitable equivalent provision can be made off site or wider benefits can be secured which outweigh the disadvantages of the loss. Policy NE 4 requires new development to make quantitative and/or qualitative improvements to the provision of open space. In particular, the Policy requires:

- on-site provision for well-designed public open space. Off-site contributions will only be accepted where it can be demonstrated that on-site provision is not feasible or is unviable.
- developer contributions towards the enhancement and creation of new areas of open space and/ or sports facilities in localities where a deficit has been identified or where development will lead to a deficit.
- sports and recreation facilities in the most accessible locations.
- priority to addressing any deficiency in the provision of play and recreation spaces designed for children and young people.
- securing community use agreements with schools and private sports facilities.

5.123 The Local Plan contains strong policies in relation to the protection and enhancement of designated as well as non-designated biodiversity. The plan requires the provision of GI as well as the protection and enhancement of the Green Network, which is integrated and linked to the protection and enhancement of wildlife corridors. These policies should help to ensure that important habitats and species are protected and that the connectivity of habitats are maintained, which is important for the long term integrity of biodiversity. In line with Policy NE 1, the Council should seek opportunities to enhance biodiversity wherever possible and provide a net overall gain.

Appraisal of Site Allocations

5.124 The appraisal has found that the majority of the preferred site allocations have the potential for a residual neutral effect on biodiversity. The following sites are located adjacent to a Local Wildlife Site:

- Beeches Hospital (SHLAA ID: 375)
- Woodhouse, Priorslee (SHLAA ID: 386)
- Former Madeley Court School Site (SHLAA ID: 514)
- The Charlton School, Severn Drive, Dothill (SHLAA ID: 748)
- Land off Majestic Way (SHLAA ID: 65)

5.125 Beeches Hospital is also within 200m of a Local Nature Reserve. Mitigation provided through the Local Plan, and available at the project level should ensure that there will be no significant negative effects on biodiversity; however, development at these sites has the potential for a residual minor negative effect through increased disturbance, noise and light pollution.

5.126 The appraisal has found that development at the majority of the preferred site options have the potential to result in the loss of green infrastructure. Development at the following sites could result in the loss of green infrastructure wholly or partially within the Green Network:

- Sutherland School, Gibbons Road (SHLAA ID: 118)
- Plot D, Pool Hill Road, Dawley (SHLAA ID: 372)
- Beeches Hospital (SHLAA ID: 375)
- Former Madeley Court School Site (SHLAA ID: 514)
- Former Phoenix Secondary School (SHLAA ID: 732)
- The Charlton School, Severn Drive, Dothill (SHLAA ID: 748)
- The Former Swan Centre, Grange Avenue, Stirchley (SHLAA ID: 912)
- Land at the Hem, Telford (SHLAA ID's: 229, 605, 606, 607, 608, 379 and 612)
- Old Park 2 (SHLAA ID: 488)
- Land off Majestic Way (SHLAA ID: 65)

5.127 None of the preferred site options are located within or adjacent to the Weald Moors.

Synergistic and Cumulative Effects

5.128 The Local Plan seeks to protect and enhance designated as well as non-designated biodiversity. The plan expects the provision of GI and the protection and enhancement of the Green Network to be integrated and linked to biodiversity, in particular the protection and enhancement of wildlife corridors. The mitigation provided through Local Plan policies and available at the project level should address any negative effects to ensure that they are not significant; however, the overall cumulative effect remains uncertain. Development is likely to lead to a loss of greenfield land/ supporting habitats, and change or disturb existing habitats to some degree either through a loss

of connectivity or through habitat fragmentation. The nature and significance of the effect will ultimately be dependent on effective implementation of the policies at the project level.

- 5.129 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities that are also proposing development. Cumulatively there is the potential for long term negative effects on biodiversity. It will be important for the surrounding Local Authorities, Natural England and other authorities who are responsible for the protection and management of biodiversity to work closely to ensure that the connectivity of habitats is protected, maintained and enhanced across administrative boundaries. The effective implementation of mitigation measures and close monitoring of existing environmental condition will be important to ensure that there are no significant negative effects as a result of the cumulative impacts of development proposed in the borough and surrounding areas. Particularly with regard to water resources and quality.

Interrelationships with other Topics

- 5.130 Biodiversity is influenced by a number of the topics considered through the IA. Potential negative effects on the water environment, air quality, soil, landscape, and climate change and flooding can also have indirect negative effects on biodiversity. Similarly, improvements to biodiversity can also have benefits for these topics as well as the economy and health and well-being.

Soil

SEA Directive Topics: Soil
NPPF paras 109-125

Relevant SA Objectives:

- SA Objective 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.

Appraisal of Local Plan Policies

- 5.131 The borough contains areas of best and most versatile agricultural land as well as areas of land that are safeguarded for minerals. For the majority of the borough the agricultural land classification is not known; however, evidence suggests that there is best and most versatile agricultural land surrounding Telford, predominantly to the North¹¹⁶.
- 5.132 The spatial strategy (Policy SP 1 to SP3) directs the majority of development towards Telford; therefore, it is likely that the proposed level of growth (Policies

¹¹⁶ Magic Map

HO 1 & EC 1) will result long term negative effects through the permanent loss of some of these areas of high quality agricultural land surrounding Telford. At this stage the agricultural land classification in the rest of the borough is not known; however, it is assumed that the rural areas are likely to contain a greater quantity of high grade agricultural land. The spatial strategy (Policies SP 1, SP 2 and SP 3) therefore direct development away from the rural areas where the greatest quantity of high quality agricultural land is likely to be found. Local Plan Policy SP 3 relates to development in the rural areas and seeks to protect best and most versatile agricultural land by using areas of poorer quality land in preference to higher quality land for new development. This has the potential for a long term positive effect against this topic. It is recommended that a similar approach is taken when locating development around Telford and Newport.

- 5.133 Development also has the potential to negatively affect soils by hindering future access to or use of mineral deposits. Draft Local Plan Policy ER 2 ensures that any applications for non-mineral development within a Mineral Safeguarded Area that could sterilise that resource are not be granted unless a number of criteria are met. Policies ER 3, ER 4 & ER 5 relate to the exploitation of mineral resources and Policy ER 6 sets out general mineral development principles.
- 5.134 Policies BE 9 and BE 10 ensure that development considers and mitigates the impacts of land instability in the borough, and ensures the appropriate management of contaminated land so as to not significantly affect health, infrastructure, water and air quality.
- 5.135 It is considered that there is sufficient mitigation provided through policies contained in the Local Plan to ensure that there will be no significant negative effects on soils.

Appraisal of Site Allocations

- 5.136 The appraisal has found that development at a number of the preferred site options could regenerate areas of previously developed land, with the potential to protect and enhance soil quality. These include:
- Sutherland School, Gibbons Road (SHLAA ID: 118)
 - Beeches Hospital (SHLAA ID: 375)
 - Former Madeley Court School Site (SHLAA ID: 514)
 - Former Phoenix Secondary School (SHLAA ID: 732)
 - Former Swan Centre, Grange Avenue, Stirchley (SHLAA ID: 912)
 - Part of Land at the Hem (SHLAA ID: 379)
- 5.137 The appraisal has also identified that development at the following preferred site options has the potential to hinder future access to and use of mineral resources:
- Land at Muxton (SHLAA ID'S: 144, 482, 504 and 508)
 - Land South of Springfield Industrial Estate Newport (SHLAA ID: 520)

5.138 The appraisal has also identified that development at the following sites has the potential to result in the permanent loss of best and most versatile agricultural land (Grades 2 and 3a):

- Woodhouse, Priorslee (SHLAA ID: 386)
- Land at Muxton (SHLAA ID's: 144, 482, 504 and 508)

Synergistic and Cumulative Effects

5.139 Proposed development will inevitably result in the loss of some high quality agricultural land, particularly around Telford. The spatial strategy focuses the majority of growth at Telford, which will help to reduce the loss of best and most versatile agricultural land in the rural areas. The Local Plan has a preference for the development of sites with lower quality agricultural land over those areas with high quality in the rural areas. It is recommended that a similar approach is taken when locating development around Telford and Newport. While development may hinder access to or use of minerals in the borough, this is not considered significant given the mitigation provided through Local Plan Policies. Overall, the Local Plan has the potential for a residual minor long term negative effect on soils, as a result of the permanent loss of agricultural land.

5.140 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities that are also proposing development. There is the potential for long term negative cumulative effects through the loss of greenfield sites and agricultural land.

Interrelationships with other Topics

5.141 The soil is influenced by and affects a number of the topics considered through the IA. Potential negative effects on soil can have indirect negative effects on economy, human health and well-being, biodiversity, the water environment and climate change and flooding. Similarly, improvements to the soil can also have benefits for these topics.

Cultural Heritage

SEA Directive Topics: Cultural Heritage
NPPF paras 126-141

Relevant SA Objectives:

- SA Objective 21: To enhance, conserve and protect the significance of cultural heritage assets and their settings.

Appraisal of Local Plan Policies

- 5.142 The borough contains a range of designated and non-designated heritage assets, which include the World Heritage Site of Ironbridge Gorge, 7 Conservation Areas, approximately 800 Listed Buildings and just over 500 Buildings of Local Interest, 29 Scheduled Monuments, and 3 Registered Historical Parks and Gardens.
- 5.143 As the spatial strategy (Policies SP 1 to SP 3) focuses the majority of growth within Telford and Newport, it is assumed that there is a greater likelihood for negative effects to designated and non-designated heritage assets and their setting within and surrounding these two settlements than in the rural areas of the borough. It is important that the Council seeks to direct growth in Telford and Newport to the less sensitive areas and ensures the protection and enhancement of heritage assets and their setting.
- 5.144 The Local Plan seeks to safeguard the character and setting of the borough's built and natural heritage. It contains a range of policies that seek to protect and enhance designated and non-designated heritage assets and their settings. This includes the following:
- Policy BE 4 (Listed Buildings) only permits alterations to, extensions and other changes to listed buildings if a range of criteria are met, which includes that the essential form, character and special interest of the building is maintained and the historic interest of the building and its setting are not adversely affected.
 - Policy BE 6 seeks to ensure that Buildings of Local Interest are preserved and enhanced.
 - Policy BE 7 seeks to ensure that historic parks and gardens, their associated features and settings are protected and enhanced.
 - Policy BE 5 permits development in Conservation Areas provided it enhances or preserves the character of the Conservation Area. It does not permit development that would prejudice the essential features of the area or not do justice to the setting. The policy expects a design and access statement, heritage significance statement as well as an impact heritage statement to accompany any development proposal affecting a Conservation Area.
 - Policy BE 3 seeks to protect and enhance the Ironbridge Gorge World Heritage Site.
 - Policy BE 8 seeks to protect and enhance Scheduled Ancient Monuments as well as other sites of national, regional or particular local archaeological importance and their settings.
 - Policy BE 8 also requires an archaeological assessment to be submitted alongside applications where archaeological remains are known or may exist. The Policy sets out the requirements following an archaeological assessment, which include archaeological remains being preserved in-situ through careful design, layout and siting of new development, or if this is not possible, provision for recording and/ or excavating the remains.

- 5.145 Policy BE 1 also requires development to be designed to the highest possible standards, informed by and responding to local distinctiveness and complying with urban design principles set out in established current design guidance. This has the potential for indirect positive effects on heritage.
- 5.146 There is also the potential for positive effects as a result of heritage and in line with Local Plan Policies opportunities for enhancement should be sought where possible. Development could improve access and signage to a heritage asset or could result in the regeneration of previously developed land which may have positive effects on its setting.
- 5.147 Proposed development has the potential for both positive and negative effects on heritage, the nature and significance of the effect is dependent on site level details, including the precise location, response to the context, and the sensitivity of design. Therefore, there remains an element of uncertainty in terms of the nature and significance of effects on heritage; however, it is considered that the Local Plan Policies provide suitable mitigation to ensure that there will be no major negative effects.

Appraisal of Site Allocations

- 5.148 The appraisal has found that development at the majority of the preferred site options has the potential for a residual neutral effect on heritage. Though a number of the preferred site options contain or are adjacent to Listed Buildings, mitigation provided through the Local Plan, including sensitive and responsive design, should ensure that there will be no significant negative effects.
- 5.149 The Former Madeley Court School Site (SHLAA ID: 514) is adjacent to the Ironbridge Conservation Area and World Heritage Site, development at this site therefore has the potential to affect the heritage setting, with the potential for a residual minor negative effect; however, mitigation provided through the Local Plan, and available at the project level should ensure that there will be no significant negative effects. As the site also contains previously developed land it is also recognised that development at the site which is sensitive and responsive in design and layout has the potential for positive effects on the heritage setting. Therefore there is an element of uncertainty until project level proposals and assessment have been carried out.

Synergistic and Cumulative Effects

- 5.150 The Local Plan seeks to protect and enhance both designated and non-designated heritage assets and their setting. Whilst it is acknowledged that development has the potential for negative effects on heritage, it is also recognised that there is the potential for positive effects by enhancing assets, locations and access.
- 5.151 There is the potential for long term cumulative negative effects on heritage within and surrounding Telford as this is where the majority of growth will be delivered. The Council will need to work closely with Historic England to

ensure that development directed away from the most sensitive areas and that appropriate mitigation is provided as part of any proposal. It is considered that there is suitable mitigation available through the Local Plan and available at the project level to ensure that there will be no major long term negative cumulative effects on heritage.

- 5.152 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities that are also proposing development. There is the potential for a long term negative cumulative effect on designated heritage assets, in particular on their setting. However, it is considered that suitable mitigation is available to ensure that these are not significant.

Interrelationships with other Topics

- 5.153 Heritage has links to a number of other topics as it can be affected by housing and employment, as well as the natural environment and climate change and flooding. The protection and enhancement of heritage assets can also have indirect positive effects on communities and health.

Waste and Recycling

SEA Directive Topics: Material Assets
NPPF para 5

Relevant SA Objectives:

- SA Objective 6: To deliver continued reduction in the quantities of waste being generated and the quantities being disposed of at landfill.

Appraisal of Local Plan Policies

- 5.154 Development proposed in the Local Plan, in particular through policies HO 1 and EC 1, has the potential to increase waste generated, both through construction, and as a result of an increased resident population. There is the potential for negative effects in the short to medium term as waste will be created during construction and in the long term as a result of additional households and employment areas generating waste day to day. Policy ER 8 expects developers to demonstrate how construction and excavation waste from development sites will be recycled, treated and/or disposed of.
- 5.155 The Local Plan contains a number of policies that will have a positive effect on this topic and provide mitigation for the negative effects associated with increased waste. This includes 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. The Local Plan also 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 (Policy ER 7).

- 5.156 It is considered that the mitigation measures provided through the Local Plan policies should ensure that the potential negative effects of policies that seek to deliver new housing and employment development are not significant.

Appraisal of Site Allocations

- 5.157 It was considered during the scoping phase of the IA that waste would be scoped out of the appraisal for site options, as it was considered that it would not help to differentiate between the sites. It is assumed that all site options have the potential to accommodate the appropriate storage and management of waste.

Synergistic and Cumulative Effects

- 5.158 Overall, the Local Plan is considered to have the potential for minor negative cumulative effects on this topic through the provision of around 15,555 homes and 76 ha of employment land during the life of the Plan. Local Plan policies ER 8 & 9 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. The plan also seeks to ensure that there are an appropriate range of waste management facilities to meet the needs of both the public and private sectors (Policy ER 7).
- 5.159 The Local Plan is most likely to interact with the Local Plans of surrounding Local Authorities to have a minor negative cumulative effects on waste.

Interrelationships with other Topics

- 5.160 There are not considered to be any strong links to other topics given that significant negative or positive effects on waste and recycling are unlikely.

Equality and Diversity Impact Assessment (EqIA)

- 5.161 Consideration of effects on equality, health and diversity has been made throughout the IA process. All aspects of the Local Plan have been assessed against a IA framework which contains several objectives that directly and indirectly link to equality, health and diversity. Nonetheless, a separate, detailed Report has been produced to demonstrate the Councils' compliance with the Equality Act 2010 and this can be found in this IA Report at Appendix VIII.
- 5.162 The Report outlines the process and results of a screening assessment for an Equalities and Diversity Impact Assessment (EqIA) of the Telford and Wrekin Local Plan. Public authorities such as Telford borough Council under the Equalities Act 2010, must in the exercise of their functions, have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by or under the Act.

- Advance equality of opportunity between people who share a characteristic and those who do not share a characteristic.
- Foster good relations between people who share a characteristic and those who do not share a characteristic.

- 5.163 An EqlA is a tool which seeks to improve the work of the Council and ensure they meet the requirement of the Equalities Act 2010. It seeks to help reduce inequality in all forms where land use planning is concerned. This can include inadequate provision of and access to services (health, food stores, and education facilities), good quality homes, employment opportunities, a healthy living environment and transport infrastructure (roads, pavements, public transport) for all members of society.
- 5.164 The development of the Local Plan has been influenced by a number of other plans, programmes and assessments relating to the protected characteristics or persons under the Equality Act 2010 and the Local Plan itself contains objectives which directly relate to addressing social inequality and inclusivity, and providing for healthier and safer communities.
- 5.165 The Vision, Strategic Objectives, and Local Plan Policies have been assessed to the same level of detail, taking into account the baseline information gathered to establish any potential impacts on the protected characteristics or persons identified under the Equality Act 2010. The assessment found that the all of the components of the plan will lead to positive effects on the protected characteristics with no negative effects being identified.
- 5.166 A number of reports are already produced on an annual basis that include consideration of equality, health and diversity within the Plan area. The Local Plan also provides a further monitoring framework that addresses equality, health and diversity through assessing the delivery of the Local Plan against its' strategic objectives and policy targets. Therefore, further monitoring regarding equality and diversity is not considered to be required.
- 5.167 The Equalities Impact Assessment has found that the Local Plan is unlikely to have negative effects on protected characteristics or persons identified under the Equality Act 2010 and as a result a full EqlA will not be required. The proposed changes to the Plan since the Publication consultation are not considered to significantly affect the findings of the EqlA.

Habitats Regulations Assessment

- 5.168 The Conservation of Habitats and Species Regulations 2010 (as amended) [the Habitats Regulations] require that HRA is applied to all statutory land use plans in England and Wales. The HRA of the Local Plan has been undertaken in accordance with available guidance and good practice and has been informed by the previous HRA screening work and findings produced for earlier iterations of the Plan, as well as advice received from Natural England.
- 5.169 The Draft Local Plan proposed the delivery of around 15,555 new dwellings and a minimum of 110 ha of new employment land across the borough up to 2031. The Plan focuses the majority of this growth in Telford (13,313 new

homes and 110 ha of new employment land) with some development also being directed towards Newport (1,182 new homes and 10 ha of new employment land) and the rural areas (902 new dwellings). It is important to note that the majority of housing development proposed through the Plan is either already completed (3,243 dwellings from 2011 to 2015) or currently has planning permission (9,310 dwellings).

- 5.170 The screening identified five Draft Local Plan Policies for which the impacts could potentially lead to significant effects either alone, or more likely in-combination. The five policies and their potential impacts were then screened against each of the eight European sites scoped into the HRA. This included consideration of the environmental pathways and sensitivities of the sites, as well as mitigation provided by Draft Local Plan Policies.
- 5.171 The screening found that the Draft Local Plan is not likely to have significant effects either alone or in-combination on any European sites as a result of short or long range (diffuse) atmospheric pollution. Proposed development will not significantly increase traffic on any major roads within 200 m of a European site and the mitigation provided through Draft Local Plan Policies, including a comprehensive mitigation strategy for traffic, will ensure that the Plan will not significantly contribute to diffuse pollution and therefore atmospheric deposition at European sites.
- 5.172 The screening also found that the Draft Local Plan is not likely to have significant effects either alone or in-combination on any European sites as a result of increased recreational disturbance. All of the European sites lie outside the Plan area and given the distribution of development and mitigation provided through Draft Local Plan Policies, in particular the provision of green infrastructure and new public open space, it is considered unlikely that proposed development will significantly increase recreational activity at any of the European sites.
- 5.173 It was also determined that the Draft Local Plan is not likely to have significant effects either alone or in-combination on any European sites as a result of increased abstraction or sewerage discharge. Existing regulatory processes - such as abstraction and discharge licensing (including EA Review of Consents), Water Resource Management Plans and the Water Framework Directive - as well as mitigation provided through Draft Local Plan policies, should ensure that there are no likely significant effects on European sites by ensuring there is sufficient water resources available as well as capacity at Waste Water Treatment Works.
- 5.174 While not essential to the findings of no likely significant effect, in line with the Detailed Water Cycle Study, the screening recommended that as a minimum, Draft Local Plan Policy ER 10 should require developers to demonstrate that water consumption in the development will be managed at a level of 110 litres per person per day. This would allow for flexibility in the Plan, should the overall level of growth need to increase in the future as a result of new or updated evidence. It is also recommended that Policy ER 10 is linked to the phasing of proposed developed set out in Policy HO 3. The

phasing of development will be a key factor in helping to ensure sufficient water resource and sewerage capacity.

- 5.175 The method and findings of the HRA are presented in a separate Report that will accompany the Local Plan on submission. The proposed changes to the Plan since the Draft Local Plan consultation ended in September 2015 were screened and found to not significantly affect the findings of the HRA. NE responded to the HRA Report that accompanied the Publication Local Plan on consultation in February 2016. They stated that they agreed with the findings of the assessment and the conclusion of no likely significant effects¹¹⁷.

¹¹⁷ Letter (dated 15 March 2016) from NE (Grady McLean) in response to consultation on the Local Plan Publication Version.

6.0 Proposed Monitoring

Introduction

- 6.1 This section discusses indicators and targets to help monitor the sustainability effects of the Local Plan. Targets and/or indicators for each sustainability objective have been identified (from the IA Framework) to provide a suggested list for discussion, and refined further to consider the significant sustainability effects of the plan, as required by the SEA Directive/ Regulations.

Monitoring Requirements

- 6.2 The SEA Regulations require that the IA develops measures for monitoring the significant effects of the Local Plan. Current SA guidance states that monitoring will enable Local Planning Authorities 'to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions'¹¹⁸. Government Guidance also requires that the monitoring results from the IA 'should be reported in the local planning authority's Monitoring Report'¹¹⁹.
- 6.3 The aim of IA monitoring is to set a framework to show whether progress is being made towards sustainable development throughout the Local Plan's plan period. This section discusses indicators and targets to help monitor the sustainability effects of the Local Plan. Targets and/or indicators for each sustainability objective have been identified (from the IA Framework) to measure the significant sustainability effects of the plan, as required by the SEA Directive.
- 6.4 Monitoring arrangements should be designed to:
- highlight significant effects;
 - highlight effects which differ from those that were predicted; and
 - provide a useful source of baseline information for the future.

Table 6.1: Potential Targets and Indicators

IA Objectives		Potential Targets and Indicators
Sustainable Economic Development		
1	To contribute to regeneration and economic development initiatives spatially targeted towards specific community groups.	■ Deprivation statistics
2	To reduce the number of people with difficulties accessing employment, education and training opportunities.	■ Unemployment rate

¹¹⁸ Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

¹¹⁹ Ibid.

3	To ensure an appropriate supply of employment land and starter business premises.	<ul style="list-style-type: none"> Employment land availability by use class
4	Improve the supply and affordability of accommodation for all groups in areas of greatest need.	<ul style="list-style-type: none"> Affordable home completions
5	Locate housing in areas with good accessibility to employment, services and amenities.	<ul style="list-style-type: none"> No of urban area dwellings No of rural area dwellings
Resource Management & Material Assets		
6	To deliver continued reduction in the quantities of waste being generated and the quantities being disposed of at landfill.	<ul style="list-style-type: none"> Monitoring municipal waste arisings
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.	<ul style="list-style-type: none"> Monitoring of primary aggregates used Monitoring of secondary aggregates used
8	To minimise demand upon water resources and to enable the timely provision of adequate waste water treatment to support increased housing provision.	<ul style="list-style-type: none"> No deterioration in Condition Assessments for relevant European Sites and SSSIs The number of planning applications approved contrary to the Environment Agency advice with regard to water quality and flood risk
9	To make travel more reliable and efficient, as well as enhance access to jobs, education, healthcare, shops and leisure.	<ul style="list-style-type: none"> Phased delivery of junction improvements Net increase in public transport useage (number of passengers) Decrease in percentage of people using the car for work
10	To work with other service providers to enable the timely provision of community facilities to accord with the delivery of new houses.	<ul style="list-style-type: none"> Community facility completions
Sustainable Communities		
11	To achieve a population profile in balance with the employment opportunities that the travel to work area is able to provide.	<ul style="list-style-type: none"> Housing completions Available employment land Employment land completions
12	To provide an environment that helps retain well-educated members of the work force.	<ul style="list-style-type: none"> Employment by sector
13	To improve the health and well-being of the population to meet the needs of the vulnerable and ageing population.	<ul style="list-style-type: none"> Leisure facility completions New green / open spaces created
14	To create opportunities for the community to reduce levels of obesity.	<ul style="list-style-type: none"> Leisure facility completions New green / open spaces created
15	To enable vulnerable people to live independently.	<ul style="list-style-type: none"> 'Lifetime homes' completions
16	To ensure urban design and layout contributes towards reducing the potential for crime.	<ul style="list-style-type: none"> Number of schemes in the Borough with design awards
Environmental Sustainability		

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.	<ul style="list-style-type: none"> Planning applications / consents within the Weald area
18	To enhance the ecological connectivity of non-designated ecological sites and enhance LBAP priority habitats and species.	<ul style="list-style-type: none"> No deterioration in Condition Assessments for relevant European Sites and SSSIs Number / area of new habitats created
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.	<ul style="list-style-type: none"> Number / area of new green / open spaces created Monitor quantity of green infrastructure Monitor funding secured and in kind projects to improve/increase green infrastructure Number of green guarantee spaces
20	To manage the landscape effects of development in recognition of European Landscape Convention.	<ul style="list-style-type: none"> Residential completion on previously developed land
21	To enhance, conserve and protect the significance of cultural heritage assets and their settings.	<ul style="list-style-type: none"> Monitoring Heritage At Risk Register changes Adoption of conservation area appraisals for all conservation areas and adoption as SPDs
22	To reduce annual CO2 emissions by 60% from 1990 levels, by 2050 (36% by 2026).	<ul style="list-style-type: none"> Decrease in percentage of people using the car for work
23	To deliver a built environment that is well adapted to cope with the changing weather conditions that are forecast.	<ul style="list-style-type: none"> Number of schemes approved for renewable energy installations
24	Incorporate measures into development proposals that contribute towards a reduction in flood risk aimed at providing a runoff rate less than greenfield rates.	<ul style="list-style-type: none"> The number of planning applications approved contrary to the EA advice with regard to water quality and flood risk

7.0 Next Steps

- 7.1 The Local Plan will be submitted to the Planning Inspectorate for examination on behalf of the Secretary of State in June 2016. The Local Plan will be supported by a range of evidence including this IA Report. An independent Inspector will be appointed to consider the soundness of the Local Plan and consider the issues that have been raised by the consultation.

Glossary & Abbreviations

MR	Monitoring Report - Government requires local planning authorities to produce annual Monitoring Reports (MRs) relating to Local Plans. According to Government guidance, these need to include the findings of SA monitoring.
AONB	Area of Outstanding Natural Beauty. A landscape area of high natural beauty which has special status, and within which major development will not be permitted, unless there are exceptional circumstances. Designated under the 1949 National Parks and Access to Countryside Act.
Compatibility Analysis	The comparison of the vision and strategic objectives against the SA Framework.
Cumulative Effects	The effects that result from changes caused by a project, plan, programme or policy in association with other past, present or reasonably foreseeable future plans and actions. Cumulative effects are specifically noted in the SEA Directive in order to emphasise the need for broad and comprehensive information regarding the effects.
Ecosystem	An ecosystem is a community of living organisms (plants, animals) and the non-living components of their environment (air, water, soil) interacting as a system.
Ecosystems Approach	An ecosystems approach provides a framework for looking at whole ecosystems in decision making, and for valuing the ecosystem services they provide, to ensure that society can maintain a healthy and resilient natural environment now and for future generations.
EqIA	Equality Impact Assessment - a process of analysing a proposed or existing service, strategy, policy or project. The aim is to identify any effect or likely effect on different groups within the community. The outcome is to make sure that, as far as possible, any negative consequences for minority groups are eliminated or minimised and opportunities for promoting equality are maximised.
Green Infrastructure	Green Infrastructure (GI) is a network of high quality green and blue spaces and other environmental features. It is designed and managed as a multifunctional resource capable of delivering a wide range of environmental and quality of life benefits (ecosystem services) for local communities. Green Infrastructure includes parks, open spaces, playing fields, woodlands, wetlands, grasslands, river and canal corridors allotments and private gardens.
HIA	Health Impact Assessment - is a practical approach that determines how a proposal will affect people's health. Recommendations to 'increase the positive' and 'decrease the negative' aspects of the proposal are produced to inform decision-makers.
HRA	Habitats Regulations Assessment - The European Directive (92/43/EEC) on the Conservation of Natural Habitats and Wild Flora and Fauna (the Habitats Directive) protects habitats and species of European nature conservation importance. The Habitats Directive establishes a network of internationally important sites designated for their ecological status. These are referred to as Natura 2000 sites or European Sites, and comprise Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).
Indicator	A means by which change in a system or to an objective can be measured.
LEP	Local Enterprise Partnership
Mitigation	Measures to avoid, reduce or offset the significant adverse effects of the plan on sustainability.
Monitoring	Activities undertaken after the decision is made to adopt the plan or programme to examine its implementation. For example, monitoring to examine whether the significant sustainability effects occur as predicted or to establish whether mitigation measures are implemented.
Objective	A statement of what is intended, specifying the desired direction of change.
SA	Sustainability Appraisal - A process by which the economic, social and environmental impacts of a project, strategy or plan are assessed.

SA Framework	The SA Framework provides the basis by which the sustainability effects of the emerging development planning document will be described, analysed and compared. It includes a number of sustainability objectives, elaborated by 'decision-aiding questions'.
SAC	Special Area of Conservation - a designation made under the Habitats Directive to ensure the restoration or maintenance of certain natural habitats and species some of which may be listed as 'priority' for protection at a favourable conservation status.
SCI	Statement of Community Involvement – sets out the Councils' vision and strategy for the standards to be achieved in involving the community and stakeholders in the preparation of all Local Development Documents and in decisions on planning applications.
Scoping	The process of deciding the scope and level of detail of the SEA. This also includes defining the environmental / sustainability effects and alternatives that need to be considered, the assessment methods to be used, the structure and contents of the Environmental / Sustainability Report.
Screening	The process of deciding whether a plan or programme requires SEA or an Appropriate Assessment.
SEA	Strategic Environmental Assessment - systematic method of considering the likely effects on the environment of policies, plans and programmes.
SEA Directive	Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment".
SFRA	Strategic Flood Risk Assessment - Detailed and robust assessment of the extent and nature of the risk of flooding in an area and its implications for land use planning. Can set the criteria for the submission of planning applications in the future and for guiding subsequent development control decisions. SFRAs inform sustainability appraisal.
Sustainability Appraisal	A systematic assessment process designed to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of spatial development planning documents.
SSSI	Site of Special Scientific Interest - Areas of high quality habitat (or geological features) of regional, national or international nature conservation importance, designated by English Nature.
Target	A specified desired end, stated usually within a specified time-scale.

APPENDICES *(provided separately)*

- I Statement of Compliance with SEA Directive & Regulations
- II Updated Baseline Information
- III Updated Review of Plans & Programmes
- IV IA of Strategy & Options 2013
- V IA of Strategic Growth Options 2015
- VI IA of Site Options
- VII IA of Vision, Aims & Objectives
- VIII EqlA Screening Report
- IX Summary of Approach to Alternatives Assessment and Selection for Site Options
- X Summary Responses to Consultation
- XI IA Screening of Changes to the Local Plan