



Telford & Wrekin Local Plan 2022-2040

Examination Matters Statement

Matter 3 - Strategic Policies (Housing)

Richborough

Professional memberships and accreditations



Fisher German LLP is a limited liability partnership.

Registered in England and Wales. Registered Number: OC317554. Registered Office: The Head Office, Ivanhoe Office Park, Ivanhoe Park Way, Ashby-de-la-Zouch, Leicestershire, England, LE65 2AB. A list of members' is available for inspection at Head Office.

1. Introduction

- 1.1. These representations are prepared by Fisher German on behalf of our client Richborough, in respect of their land interests west of Wellington Road, Horsehay, Telford. This land, as identified on Figure 1 below, is a proposed allocation for circa 70 dwellings in the Regulation 19 document (Local Plan Policy HO1 – Site Reference HO12). The identification of the site as a residential allocation is fully supported.

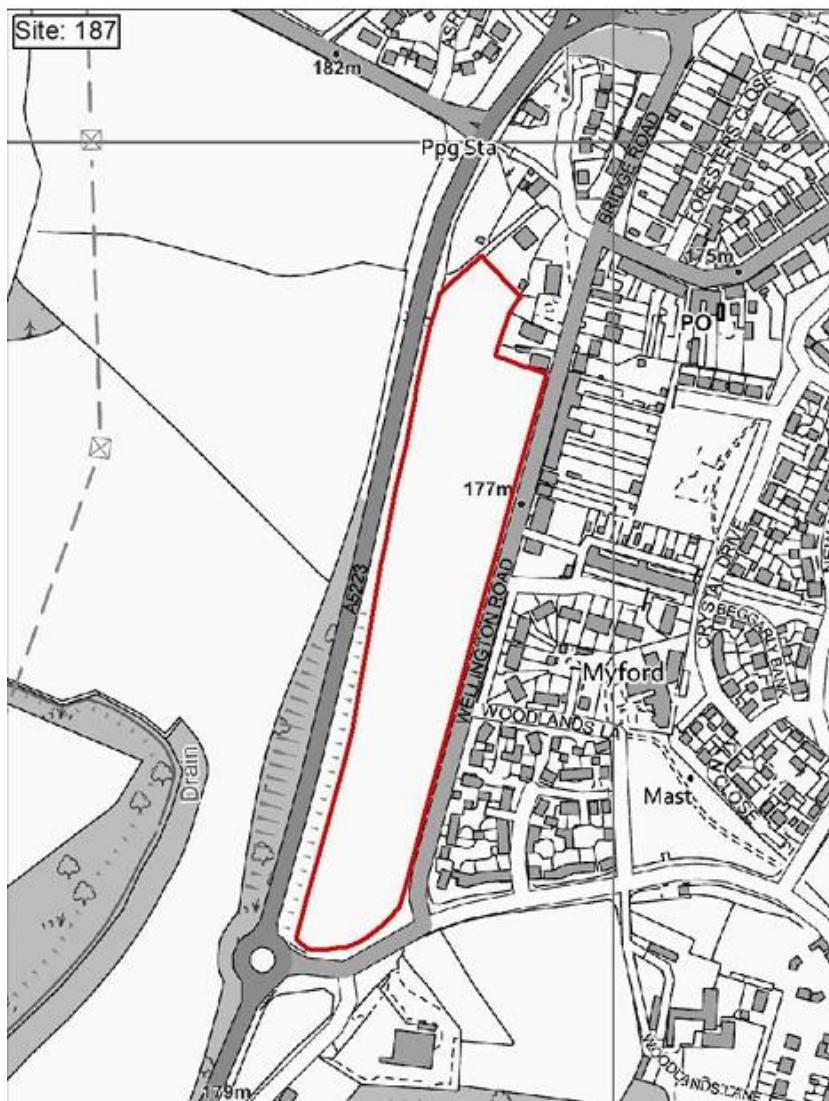


Figure 1: Site Boundary of residential allocation – West of Wellington Road, Telford.

- 1.2. Richborough submitted an outline planning application for 80 dwellings on the 17 December 2025 (App ref: TWC/2026/0005), and it was validated on the 7 January 2026. Updates can be provided if useful at the examination hearing sessions.

2. Representations

Issue 1: Housing Requirements

Q26 - Is the housing requirement figure of 1,010 dwellings per annum/20,200 over the plan period as set out in Policy Strategic S4 soundly based, and does it accord with the evidence and national planning policy and guidance?

- 2.1. Broadly yes, with a potential need for slight amendment. The NPPF affirms at Paragraph 62 that "to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for" [our emphasis].
- 2.2. The PPG (Housing and economic needs assessment chapter) sets out the standard methodology for assessing Local Housing Need. Paragraph: 001 Reference ID: 2a-001-20241212 confirms "housing need is an unconstrained assessment of the minimum number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations".
- 2.3. The PPG further clarifies at paragraph: 008 (Reference ID: 2a-008-20241212) that "local housing need calculated using the standard method may be relied upon for plan making for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination".
- 2.4. Paragraph: 040 (Reference ID: 2a-040-20241212) confirms that "the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination".
- 2.5. Table 4 of the Regulation 19 document (Housing supply and requirement (as of 31st August 2024)) affirms that the proposed housing requirement is 1,010 dwellings per annum. This was calculated as of the August 2024, thus predates revisions to the Standard Method made in December 2024. Regardless, the proposed housing requirement is above both the pre-December 2024 requirement (463 dwellings) and post-December 2024 requirement (881 dwellings). Policy Strategic S4: Housing delivery strategy confirms the housing requirement is inclusive of a 153-dwelling per annum contribution to the Black Country Authorities unmet need.
- 2.6. The Council's justification for going above Local Housing Need was contained within the in the Economic and Housing Development Needs Assessment (EHDNA). We concur with the conclusions of the document and that adopting a requirement higher than base LHN has been specifically justified in Telford and Wrekin both demographically and having regard for a need to meet a proportion of unmet needs (discussed below).
- 2.7. The PPG is clear wherein Council's have adopted a higher housing requirement than base Local Housing Need, this should not normally require specific justification.
- 2.8. It is potentially arguable that the Council should slightly increase the housing requirement, from 1,010 dwellings to 1,034 dwellings, to ensure delivery of base Local Housing Need (881 currently) and the proposed contribution to unmet need (153 dwellings), though in reality such a difference is marginal and such amendment is not likely to yield significant additional housing delivery.

- 2.9. Overall, it is considered that the Council's proposed housing requirement is broadly robust, and if requires amendment this is minimal at best (24 dwellings per annum – a 2% increase). This of course relies on the contribution to unmet need being found sound, with any additional provision potentially requiring further upward amendment.
- 2.10. Should it be established that it is not possible to justify a contribution to unmet needs (again, discussed below), then the oversupply proposed in this Plan remains justified as per the EDHNA conclusions. As such, the Plan's approach is likely to be sound in all scenarios, save a need to deliver a higher quantum of unmet need, which could be dealt with via main modifications or immediate Plan review (either being preferable than the Plan being found unsound which will reduce certainty in the local housing market). However, as discussed below due to the lack of a 2024 agreed position on Black Country unmet needs, a comment that insufficient housing has been provided is likely to be premature, moreover it would be unreasonable to prevent advancement of this Plan due to a lack of such a position. Again, Plan review triggers would seem like the sensible approach if such a concern was identified and that was deemed to fail a test of soundness. This would be quicker and allow the function of the Plan led system in the interim.

Q27 - Is the inclusion of 153 dwellings per annum as a contribution to the unmet needs of the Black Country Authorities justified and supported by evidence?

- 2.11. In the lack of any up to date and quantified SoCG on unmet needs utilising the 2024 Local Housing Need across the Black Country, there is no accurate figure on which any neighbouring local authority can use as the starting point in establishing a fair, equitable and justified contribution to unmet needs. However, unmet needs are acknowledged likely to exist, as such the commitment of any authority, including Telford and Wrekin, to make any positive adjustment to their housing requirement to meet such unmet needs should be supported and not overly scrutinised as per the PPG.
- 2.12. Whilst meeting unmet needs from a neighbouring authority is clearly part of the tests of soundness, with Criterion A: Positively Prepared affirming to be sound Plans should provide "*a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development*" [our emphasis]. This is clearly caveated however that it must be practical to do so. With the lack of an agreed SoCG with the Black Country authorities, it is considered unreasonable to challenge any adopted approach of potential receptors of unmet need, particularly wherein they do make a considerable level of provision (3,000 dwellings over the Plan period as currently proposed).
- 2.13. Furthermore, Telford and Wrekin does not directly adjoin the Black Country area and is not acknowledged to be within the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) as confirmed within the Greater Birmingham Black Country Housing Market Area (GBBCHMA) HMA Officer Agreed Version Statement of Common Ground Regarding Housing Shortfall Position (21st March 2025) (Paragraph 1.3). This document however expressly confirms its role is to consider unmet needs against the 2023 NPPF (Paragraph 3.10), thus does not help plans advancing under the 2024 PPG and Framework. Again, on this basis it would seem highly unfair to attribute any issue of soundness for any positive delivery of housing to unmet needs arising from GBBCHMA. The more likely conclusion would be that it is not justified to deliver any unmet needs in Telford given the lack of an agreed SoCG, however the Plan has already demographically justified its proposed housing requirement through the EDHNA, so is covered in either event.

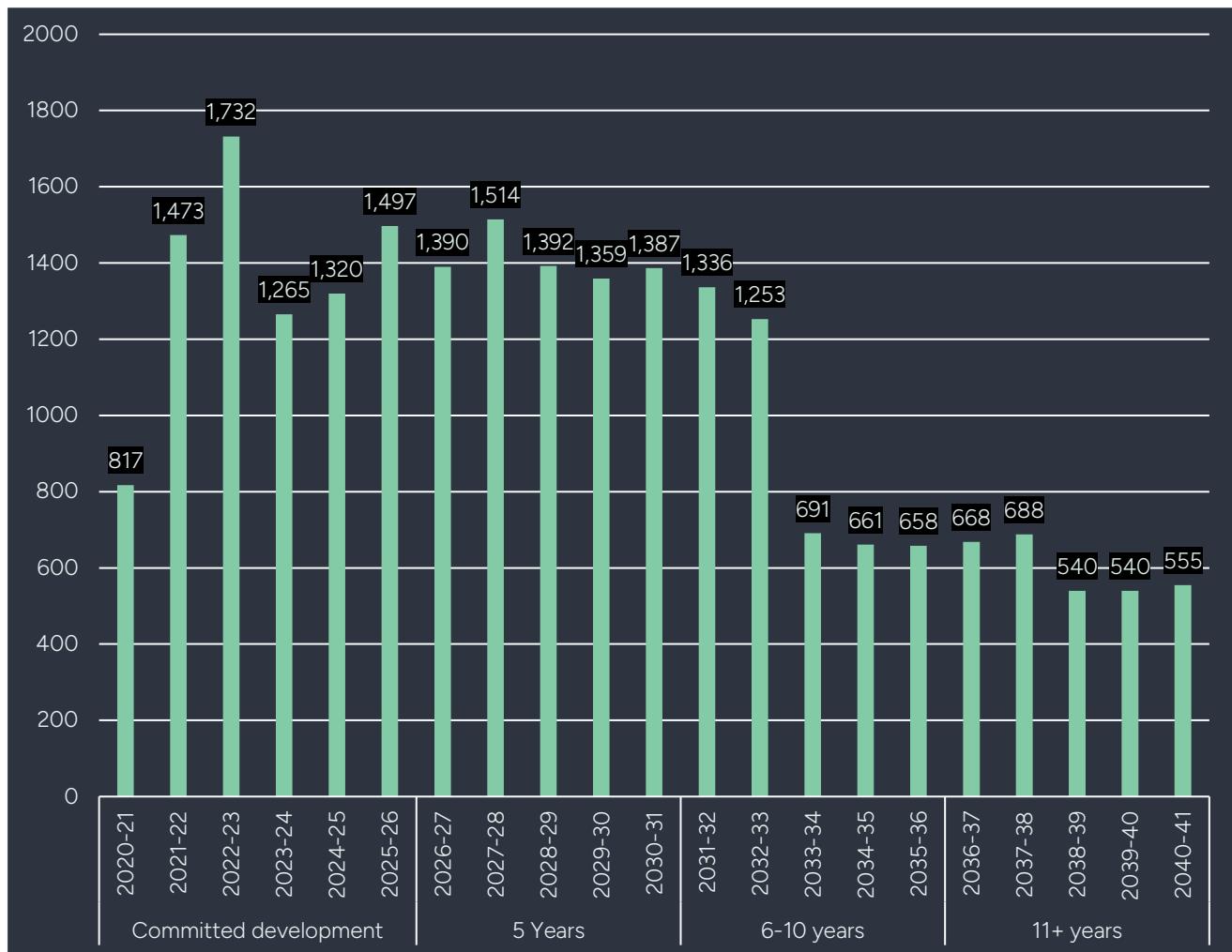
Issue 2: The five-year supply and overall housing supply position

Q28 - Will there be a five-year supply of specific, deliverable sites from the intended date of adoption of the Local Plan? The five-year supply and overall housing supply position

- 2.14. Comments on behalf of Richborough in respect of this representation focus on Richborough's land interests at Wellington Road, Horsehay, Telford (HO1 – Site Reference HO12). No comments are made in relation to any other specific site.
- 2.15. The Council's Housing Delivery Topic Paper (September 2025) (TP01) states at Paragraph 4.3 that "*the Council's housing trajectory confirms that there is a deliverable five-year housing land supply at the point of adoption, and that sufficient developable land has been identified to meet the remainder of the requirement over the long term*".
- 2.16. It is noted however that the trajectory in the aforementioned topic paper does not contain individual sites, thus it is impossible to discuss in detail the assumptions made by the Council on individual site delivery. It would likely benefit the examination if an up to date trajectory could be provided to the examination ahead of the relevant hearing session on land supply to enable fair opportunity for parties to comment on individual site delivery assumptions.
- 2.17. Row 3D: *Residual oversupply/shortfall* of the trajectory also appears to be incorrect, suggesting that there will be a significant community shortfall at the end of the Plan Period (-21,159 units), despite the Row 3C Residual requirement stating the Plan will overdeliver against the housing requirement by some 2,000 dwellings.
- 2.18. Notwithstanding it is not possible to assess the trajectory in detail (given the lack of individual site assumptions), it is possible to undertake a 5-year housing land supply assessment against the adopted requirements and assumptions as shown. In terms of a base date for the purposes of this question we assume a 2026/27 adoption date as per the requirements of Paragraph 72a of the NPPF which requires planning policies to identify "*specific, deliverable sites for five years following the intended date of adoption*". Assuming adoption in the year 2026/27, the Council are projected to have an existing oversupply of 2,044 dwellings, independently calculated using overall annual completions as shown on the trajectory. Even before calculating housing land supply inclusive of existing Plan period oversupply, the Council's trajectory points to a healthy land supply of 6.6 years, inclusive of a 5% buffer. Factoring in the aforementioned oversupply, this increases to 7.1 years. This is of course dependent on the following matters which may change through the examination:
- Plan period
 - Housing Supply Analysis
 - Housing Requirement
- 2.19. Turning to Richborough's land interests, as set out in the introduction an outline planning application was submitted at the end of last year and validated in at the beginning of January 2026. It is hoped a permission can be achieved this calendar year. There would then be a period of marketing, prior to disposal to a housebuilder. Assuming circa 3 months that would be March 2027. Allowing a further year for Reserved Matters, discharge of conditions (March 2028). Delivery of units would likely commence the following year (2028/29), starting at 20, increasing to 40 (2029/30) and the final 20 following (2030/31). Assuming a Plan base date of 26/27, all units can deliver within a 5-year period, subject to timely determinations. Of course, if outline permission was granted earlier in 2026 than envisaged, the final plots may be completed in the monitoring year 2029/30.

Q29 - Does the plan make provision for a supply of specific, developable or broad locations for growth for the subsequent years 6-10 and where possible years 11-15 of the remaining plan period?

- 2.20. Yes, as demonstrated in the table below, the Plan does make provision for subsequent years 6-10 and years 11-15 of the remaining plan period. Whilst supply notably drops in 2033-34, a 5-year Plan review should be close to completion again to assess housing needs and increase supply if required ahead of this drop off.



- 2.21. Subject to consideration of the matters set out above at Paragraph 2.18, on the basis of the trajectory as proposed the above is considered appropriate and in accordance with adopted Government policy in increasing the supply of housing in the short term. If there is concern around delivery rates from 2032-33 onwards, this can be rectified through an earlier Plan review, rather than delay of the adoption of this Plan which will slow housing delivery in the interim.

Q30 - Are the allowances for windfalls and lapses soundly based? Are they justified?

- 2.22. The Council makes an allowance of 60 dwellings per annum on small windfall sites, which is only 5% of the overall total and is backed on local evidence of similar delivery. The Council only utilises small sites and makes no allowance on larger sites, which are less likely to come forward on a windfall basis given there will be an up to date Local Plan providing larger site allocations, reducing the potential for speculative applications. This is both a small percentage of the overall housing requirement and clearly evidenced thus justified. We are not aware that this quantum is unreasonable, but others may have more detailed analysis.