

**Barratt Redrow**

# **Telford Local Plan Examination: Matter 3**

Date of report: 23/01/2026

**savills**

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## Document History

Issue	Date	Issued by	Comment
1.0	23/01/2026	MB	

# 1. Introduction

- 1.1 Savills has been instructed by Barratt Redrow to submit a Hearing Statement in response to Matter 3 of the Telford Local Plan Examination. This Statement expands upon the representations submitted to Telford and Wrekin Borough Council (“the Council”) at the Regulation 19 consultation stage for the Local Plan and provides a response to: Issue 1 Questions 26 and 27; and Issue 2 Questions 29, 32 and 33.
- 1.2 Barratt Redrow is promoting land to the south east of Newport, which is located in 3 distinct parcels: land east of A518 and west of Chetwynd Aston / Littehaes Road (Parcel 1); land west of A41 and south of A518 (Parcel 2); and land east of the A41 (Parcel 3). Parcels 2 and 3 include land within proposed employment land allocations EC2, EC3 and EC4.

## 2. Issue 1

***Question 26: 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 The December 2024 NPPF (paragraph 36a) identifies a requirement for Local Plans to, as a minimum, meet the area's objectively assessed needs. In December 2024 the revised standard method calculation identified a housing need for the Borough of 857 dwellings per annum as a minimum. The housing requirement figure of 1,010 dwellings per annum included in the Publication Version of the Local Plan (CD01) therefore meets the minimum standard method figure for the Borough plus an allowance to meet a cross-boundary need.
- 2.2 However it is considered that there is still a need to: a) take account of the latest standard method calculation figure; b) revisit the additional 153 dwellings per annum allowance for cross-boundary provision; and c) ensure that there is a sufficiently flexible supply of housing sites to enable the requirement to be met.
- 2.3 In relation to query a) it is noted that the Council has proposed a revised housing requirement of 20,680 dwellings over the 2021-2041 Plan period within the Submission Version of the Local Plan (CD08), which is based on meeting an increase in the standard method calculation to 881 dwellings per annum to take account of the revised affordability and existing housing stock data<sup>1</sup> made available during 2025, whilst also retaining the additional 153 dwellings per annum allowance for cross-boundary provision. Queries b) and c) are considered further in response to Questions 27 and 29.

***Question 27: 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?***

- 2.4 Unlike other Local Planning Authorities within the Greater Birmingham and Black Country Housing Market Area ("HMA"), The Telford and Wrekin Borough Council administrative area is not constrained by Green Belt. With direct public transport links, it is considered that the Borough is well connected to the Black Country and should therefore be contributing additional housing to address the significant housing shortfall, in accordance with paragraph 36a of the December 2024 NPPF.
- 2.5 The proposed contribution of 153 dwellings per annum (3,060 dwellings in total) over and above the Borough's own housing requirement is a positive proposal and is more than other Local Authorities in the HMA are currently committing to providing to assist with addressing the Black Country housing supply shortfall. In proposing this contribution the Council is acknowledging the requirement in paragraph 62 of the December 2024 NPPF to take unmet needs from neighbouring areas into account in establishing the amount of housing that it is planning for.
- 2.6 It is noted that the Council's review of migration patterns has drawn upon ONS internal migration data at local authority level (mid-2022 estimates), which assesses flows between Telford & Wrekin Borough and the Black Country Authorities and, through translating household migration into a dwelling equivalent figure, indicated a contribution of around 126 dwellings per annum<sup>2</sup>. The proposal of a contribution which exceeds this figure is therefore also positive. However what remains

<sup>1</sup> TW11. Telford and Wrekin Local Plan 2021-2041 Housing Delivery Topic Paper Updated Version. Dated January 2026. Paragraph 2.10.

<sup>2</sup> TW11. Telford and Wrekin Local Plan 2021-2041 Housing Delivery Topic Paper Updated Version. Dated January 2026. Paragraph 3.8.

unclear is why the contribution remains capped at 153 dwellings per annum. The proposed contribution needs to be justified in order to be sound (NPPF 2024 paragraph 36).

- 2.7 The 4<sup>th</sup> April 2025 letter issued by the Council to Dudley Council identified that the unmet need for the Black Country Authorities amounted to 30,427 dwellings at that time, against which the Council is proposing to contribute 153 dwellings per annum. There is therefore still an opportunity for more of the significant residual unmet housing need to be met on land which is outside of the Green Belt within the Telford and Wrekin Borough administrative boundary.
- 2.8 Furthermore it is important to not lose sight of the wider Greater Birmingham and Black Country HMA. The Statement of Common Ground between the HMA authorities (dated 21<sup>st</sup> March 2025)<sup>3</sup>, as published as part of the Sandwell Local Plan Examination process, estimated a HMA shortfall of around 76,427 dwellings up to 2042. It is noted that the adopted North Warwickshire Local Plan includes a contribution of 3,790 dwellings towards the HMA shortfall. However if all of the HMA authorities only contribute a similar amount or less (as is currently proposed within the emerging Telford Local Plan), then the shortfall within the Greater Birmingham and Black Country HMA will continue to be a significant cross-boundary issue which is not addressed by any of the authorities, contrary to Section 39 of the 2004 Planning and Compulsory Act. Similarly there is therefore an opportunity for more of this shortfall to be met on land which is outside of the Green Belt within the Telford and Wrekin Borough administrative boundary.
- 2.9 In increasing the housing requirement to accommodate a greater proportion of HMA shortfall there will be a need to identify additional housing sites to meet this need. These can be introduced through making modifications to the Local Plan. Barratt Redrow deems this to be achievable and has put forward proposals for how land on the edge of Newport can assist with delivering this additional housing land supply, in the form of: additional housing site ref. 397, which is considered to have the potential to accommodate an additional circa 250-300 dwellings; and also the potential to deliver additional dwellings in and around proposed employment allocation EC2 via incorporating some residential uses within EC2 and / or expanding EC2 into adjacent land which has been promoted by Barratt Redrow. Given the proximity of this land to the second most sustainable settlement in the Borough and access to existing and future employment opportunities this location is considered to present a genuine opportunity to deliver additional sustainable development.

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<sup>3</sup> Greater Birmingham Black Country Housing Market Area (GBBCHMA) HMA. Officer Agreed Version. Statement of Common Ground Regarding Housing Shortfall Position at 21<sup>st</sup> March 2025. [Document SA/ED16].

## 3. Issue 2

**Question 29: 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?**

- 3.1 The Council's submitted trajectory<sup>4</sup> identifies a series of housing allocations and sustainable communities which are anticipated to deliver housing development within the 6-10 and 11-15 year periods.
- 3.2 It is noted that on an overall basis that the Publication Version of the Local Plan (CD01) proposes a housing land supply for a Local Plan period to 2040 from existing commitments and new allocations which achieves the identified housing requirement of 20,200 homes. It is also noted that the proposed Submission Version of the Local Plan (CD08) proposes a housing land supply for a Local Plan period to 2042 of 21,110 dwellings against a housing requirement of 20,680 dwellings, representing an oversupply of 430 dwellings during the Local Plan period<sup>5</sup>.
- 3.3 Whilst the proposed requirement and supply would therefore address the minimum objectively assessed housing need for the Borough, as well as include an allowance for cross-boundary provision for the Black Country HMA, there is also a need for the approach to be consistent with the December 2024 NPPF paragraph 61 requirement to significantly boost the supply of homes and for a sufficient variety and amount of land to come forward where it is needed.
- 3.4 Some of the proposed housing allocations are projected to deliver housing (1,595 dwellings) beyond the Local Plan period<sup>6</sup> and this element of supply is accordingly not included within the housing land supply for the Local Plan period. However the evidence submitted does not demonstrate that this longer-term element of supply could be brought forward earlier and therefore this should not be relied upon to provide contingency to accommodate any slippage in delivery from other sites or potential lapses of planning permissions.
- 3.5 There is accordingly considered to be a need for the Local Plan to include the allocation of additional housing sites in order to ensure that there is sufficient flexibility in the supply of housing land, which will overcome potential delays in delivery or reduced capacities from identified sites, and thereby enable the housing need for Telford Borough to be met in sustainable locations adjacent to existing settlements during the new Local Plan period, whilst ensuring the achievement and ongoing maintenance of a five-year housing land supply. Barratt Redrow considers that this is achievable and, as identified within the response to Question 28, has put forward proposals for how land on the edge of Newport can assist with delivering this additional housing land supply.

**Question 30. Are the allowances for windfalls and lapses soundly based? Are they justified?**

- 3.6 No comment.

<sup>4</sup> TW11. Telford and Wrekin Local Plan 2021-2041 Housing Delivery Topic Paper Updated Version. Dated January 2026. Appendix 1 and Appendix 2.

<sup>5</sup> TW11. Telford and Wrekin Local Plan 2021-2041 Housing Delivery Topic Paper Updated Version. Dated January 2026. Paragraph 8.1.

<sup>6</sup> TW11. Telford and Wrekin Local Plan 2021-2041 Housing Delivery Topic Paper Updated Version. Dated January 2026. Paragraph 8.2.

**Question 31. Are the Sustainable Communities fundamental to the housing delivery strategy such that they should be referred to in Policy Strategic S4?**

3.7 No comment.

**Question 32. What does criterion 4 of Policy Strategic S4 mean? Is it unambiguous in what it is requiring? Is the trigger level clear? Having regard to the policy and para 4.41 of the supporting text, are the actions which the Council would then take clear and achievable?**

3.8 It is noted that paragraph 4.41 of the Publication Version of the Local Plan (CD01) identifies that, where it is considered necessary, the Council is proposing to put an action plan in place to assist in the delivery of stalled or not started sites. It is however not clear what sort of measures the Council is intending to include in such an action plan or how it is intending to enforce these actions. It is also not clear whether action plans are the only mechanism that the Council is envisaging in order to proactively increase the delivery of sites through the planning process.

**Question 33. What does criterion 5c of Policy Strategic S4 mean when it refers to a 'brownfield first' approach to windfalls? Is this justified? Is it clear as to how it would be applied?**

3.9 Planning applications for windfall housing development will need to be assessed against the general policies of the Local Plan and the requirements of the NPPF. It is not clear how a 'brownfield first' approach to windfall development would be achieved.

3.10 Paragraph 124 of the December 2024 NPPF encourages as much use of brownfield land as possible in order to meet the objectively assessed needs. Paragraph 125c of the December 2024 NPPF also states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.

3.11 If the implication is that applicants would need to undertake a form of sequential assessment of development land opportunities if development is being proposed on unallocated greenfield land in order to demonstrate that there are no suitable, available and achievable brownfield land opportunities available then it should be recognised that such an approach would not be consistent with the NPPF. Furthermore it should also be noted that the Publication Version of the Local Plan (CD01) contains general policies, such as Policy NE5, Policy NE7, Policy EC3 and Policy HO12 which do not entirely exclude development in greenspace or rural areas subject to meeting certain criteria.

[Statement word count: 2,016 words in total].

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