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**TELFORD AND WREKIN LOCAL PLAN  
HEARING STATEMENT  
MATTER 3 – STRATEGIC POLICIES (HOUSING)**

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**Land at Bratton, Telford**

**On Behalf Of:**

David Wilson Homes

**Prepared By:**

John Pearce BSc (Hons) MTPL MRTPI

Job Ref: P1826

Date: 21<sup>st</sup> January 2026

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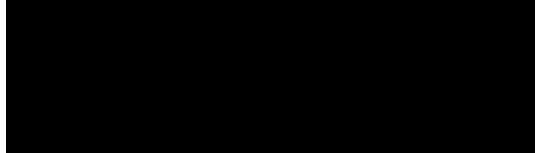
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**Issued By**



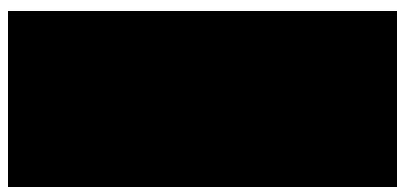
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**Date: 21<sup>st</sup> January 2026**

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**Approved By**



**Signature**

**Print Name: John Pearce**

**Date: 21<sup>st</sup> January 2026**

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## **1.0 INTRODUCTION**

- 1.1 Harris Lamb Planning Consultancy are instructed by David Wilson Homes (“*DWH*”) to submit a Hearing Statement in response to the Inspector’s Matter 3 questions that relate to Plan’s strategic housing policies. Whilst we are generally supportive of the Plan’s housing policies amendments are required in order for the policies to be found sound.
- 1.2 DWH are promoting land at Bratton, which is included as one of the proposed sustainable communities to deliver 2,100 homes and associated facilities (SC1 – Land at Bratton). The allocation will play an integral role in the delivery of the Plan’s housing requirement. The principle of the allocation of the site is fully supported. We do, however, have concerns with other aspects of the Plan’s housing delivery policies.
- 1.3 The Submission Version of the Telford and Wrekin Local Plan review (September 2025 – CD08) and the Housing Delivery Topic Paper (TW11) have different housing figures to the Local Plan Review – Publication Version (CD01). This Hearing Statement refers to the housing figures in the Submission Version of the Plan and the Housing Delivery Topic Paper.

## 2.0 RESPONSE TO INSPECTOR'S QUESTIONS

### Issue 1: The Approach to the housing requirement

***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 Plan's housing requirement has two component parts; i) the local housing need figure for Telford and Wrekin, and ii) a contribution to meet the Black Country's unmet housing needs. Our response to question 26 focuses on the local housing needs figure for Telford and Wrekin. We comment on the Black Country unmet need figure in response to Question 27.
- 2.2 The Housing Delivery Topic Paper (TP11) advises at paragraph 2.10 that:

***The resulting baseline local housing need figure is 881 dwellings per annum (668 × 1.32). This figure does not include any potential buffers and is based solely on the most recent data released in 2025. It is subject to change as the inputs are updated annually.***

- 2.3 The local housing needs figure used the Plan is the minimum Standard Method housing figure. It has not been uplifted in anyway. However, there is evidence that the Standard Method housing figure may be insufficient to meet Telford and Wrekin's housing need. For example, the Telford and Wrekin Economic and Housing Development Need Assessment – February 2025 (EH01), advises:

***"3.91 The assessment of needs of different groups is informed by demographic trends and market signals together with a range of other indicators and evidence that may be relevant to identifying people and households with particular characteristics of need. This also enables evaluation of the level of need as a proportion of the total existing or future number of households or population.***

**3.92 This could, for example, be the case if projected demographic trends over the last few years and recent levels of housing delivery are expected to continue and produce equivalent dwelling and household numbers that exceed the result of local housing need. While this evidence may draw upon the same characteristics that indicate housing need is greater than the result of the Standard Method, the extent of housing needs of different groups taking account of demographic characteristics is, by definition, independent from stock-based inputs to the calculation.”**

and

**“3.83... This level of employment growth is not considered to represent realistic assumptions based on demographic trends or market signals captured by the Growth Scenario but nonetheless indicates that planning for in excess of the Standard Method could capture even higher levels of economic development.”**

- 2.4 The Economic and Housing Development Need Assessment does provide some justification for the local housing needs figure exceeding the minimum Standard Method housing figure. In addition, the Framework (December 2023) advises at paragraph 61 that the Standard Method housing figure should be used to determine the “minimum” number of homes to be planned for. This is not, however, reflected in the wording of Policy Strategic S4 – Housing Delivery Strategy.
- 2.5 There is a simple solution to this matter. Where Policy S4 states that the Council “will deliver” 20,680 dwellings an amendment so that the policy instead states **“The Council will deliver a minimum of 20,680 homes over the plan period.”**
- 2.6 This amendment would make the policy consistent with paragraph 61 of the Framework as it would reflect that the fact the Standard Method housing figure is the minimum amount of housing to be planned for. It would also build in

flexibility to reflect the fact there is evidence that the Standard Method housing figure could be exceeded.

***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?***

- 2.7 We support the emerging Plan contributing to meeting the unmet housing need arising from the Black Country authorities. The Housing Topic Paper (TW11) advises that the 153 dpa figure that will be planned for to help meet the housing needs to the Black Country has been established principally through a review of migration patterns using ONS internal migration patterns.
- 2.8 This is a sensible starting point. However, migration patterns are influenced by a range of factors, not just housing need. Furthermore, as a consequence of the new Standard Method, the Black Country authorities, and Birmingham City, are/will have to prepare Local Plans with housing requirements that significantly exceeds their adopted Plans. Given the limited development opportunities in the Black Country and Birmingham the combined unmet housing figure is likely to be significant. The migration patterns model does not take this into account, it simply reflects past migration trends. Telford and Wrekin may have to provide significantly more than 153 dpa to assist in the growth of the conurbation. The Plan, should, therefore, have further flexibility built in to help support the unmet housing needs from the conurbation.
- 2.9 As with the delivery of local housing, this matter can also be addressed by policy S4 being amended to refer to the housing delivery being a “minimum”. This would make the plan consistent with Framework paragraph 62.

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

***Question 28. Will there be a five-year supply of specific, deliverable sites from the intended date of adoption of the Local Plan?***

2.10 Table 13 of the Housing Delivery Topic Paper suggests that there will be a 6.2 year housing supply upon the point of adoption. In order for this to be achieved significant reliance is placed on the delivery of the Plan's proposed housing allocations.

2.11 Appendix 2 – Anticipated Housing Delivery and Completions by Allocation, identifies proposed allocation SC1 – Land at Bratton, delivering 545 dwellings during the five year period. It is a critical component of the five year housing land supply. DWH control part of the allocation and the proposed housing trajectory is fully supported. However, it essential that policy SC1 actively facilitates early delivery from the allocation. We, therefore, suggest that wording is added to the policy this effect.

***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?***

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

2.12 The Submission Plan (CD08) proposes a windfall allowance of 120 dpa. This is a reduction from the Publication Version (CD01), which proposes a windfall allowance of 160 dpa. This reduction is supported. The planning system should be plan led (Framework paragraph 15). There should not, therefore, be a reliance on windfall development in meeting the Plan's housing requirement.

2.13 Windfall development is often small scale and does not provide affordable housing as it falls below the affordable housing delivery threshold. Delivery is sporadic and cannot be guaranteed. It should, therefore, form a minor component of the Plan's housing supply.

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

2.14 The Sustainable Communities are “fundamental” to the housing delivery strategy. The three Sustainable Community Allocations are expected to deliver a minimum of 6,595 dwellings during the Plan period. This is approximately 32% of the Plan’s housing requirement. It would, therefore, be entirely appropriate for policy S4 to be amended to make specific reference to the importance of the Sustainable Communities and directly support their development.

**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?**

2.15 Part 4 of the policy is not clear. If the Council are unable to identify a 5 year housing land supply with an appropriate buffer the tilted planning balance set out in the Framework will be engaged to rectify the shortfall. Policy S4 bullet point 4 would be an “out of date” policy in the absence of a five year housing land supply. Bullet 4 would, therefore, only be effective if it was triggered when there was more than a five year supply available. It is not clear in the policy or its supporting text when it would be triggered. Bullet point 4 should be deleted.

**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?**

2.16 No Comment

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