

TELFORD & WREKIN LOCAL PLAN REVIEW EXAMINATION

MATTER 4 – STRATEGIC POLICIES (OTHER THAN HOUSING)

Define Planning and Design Ltd on Behalf of Bloor Homes (Regulation 19 Representations Ref. E135)

The following hearing statements relate to Bloor Homes Limited's (BHL) land interests that form part of proposed new Sustainable Communities "SC1 Land at Bratton" and "SC2 Land North East of Muxton" as identified by emerging Local Plan (eLP) Policy HO2.

ISSUE 1: HAVE THE STRATEGIC POLICIES BEEN POSITIVELY PREPARED, DO THEY REFLECT THE PRIORITIES AND DEVELOPMENT STRATEGY, ARE THEY JUSTIFIED BY A ROBUST AND CREDIBLE EVIDENCE BASE, AND ARE THEY CONSISTENT WITH NATIONAL POLICY?

Question 37: Is the Plan clear enough to be effective about: (a) how the strategy for employment land relates to the overall strategy for growth; and (b) the broad quantum and location of different employment land types to be delivered?

The Regulation 19 representations submitted on behalf of BHL (Respondent ID E135; Index 448) identified that further clarity was needed in relation to the employment land included within the Sustainable Communities allocations, and its status with regard to the draft employment land strategy and policy strategic S3.

In January 2026 the Council submitted to the examination an updated Employment Land Delivery Topic Paper (TWO3), Employment Land Delivery Spreadsheet (TWO3a) and a Map of Employment Land Supply for Telford and Newport (TWO4). Topic Papers for the three Sustainable Communities have also been submitted to the examination.

TWO3 states that 75.6 hectares of employment land is to be delivered at the Sustainable Communities, which totals that set out in Policy HO2 for the three allocations. The majority of that employment land is to be provided in site SC3.

TWO3 paragraph 6.21 confirms that the employment to be provided in sites SC1 and SC2 is envisioned to be a mix of provision with scope for smaller business parks that can provide local services and employment opportunities to residents helping to make those site's sustainable. Bloor Homes agrees with this distinction albeit the sites are very well-connected to Telford and existing employment opportunities, and will also deliver other on-site employment opportunities including at the local centre and school. Therefore, their sustainability does not necessarily rely on the provision of this employment land.

Whilst TWO3 has clarified the sites which contribute to the employment land supply, the policies must be clearer on this to ensure a consistent approach can be taken to relevant sites during the planning application stage by developers and decision makers. However, there must also be flexibility in the uses supported within these areas so that their development

can appropriately respond to the market needs and new and emerging industries. This approach is supported by the NPPF which advocates for planning policies to *“help create the conditions in which businesses can invest, expand and adapt [...] The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future”* (Paragraph 85) and requires planning policies to *“be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances”* (Paragraph 86e).

Question 42: Is Policy Strategic S7 justified, consistent with the evidence and does it accord with the relevant regulations?

Representations submitted on behalf of Bloor Homes set out a number of objections to Policy Strategic S7. These principally raised the need for the Council’s Viability Report to be updated to account for the known infrastructure requirements, particularly in relation to the Sustainable Communities. This work should then inform the final Infrastructure Delivery Plan to which S7 should explicitly link to, and clearly set out how infrastructure will be delivered over the plan period to support the housing and employment delivery within the Borough.

The Policy in its current form is not sound as it fails to be clear and unambiguous as required by the National Planning Policy Framework (NPPF) at paragraph 16d and is not justified, particularly in placing the onus of delivering utility infrastructure on the developer and in reserving the right to review developments which have made a viability case, on completion, to “claw back funding”. This is a completely unreasonable and unjustified approach, which will create uncertainty for developers wishing to invest in the area and is not reflective of the significant risks they take when developing such sites.

The Council has put forward proposed modifications (CD08) to Policy Strategic S7. Such changes should be subject to consultation in due course, but the modifications proposed do not address the significant concerns raised in previous representations and in the case of Part 4 introduce further, significant concerns in terms of the proposal to “claw back” contributions. The proposed modification introduces a requirement for schemes of over 500 units to be reviewed on the completion of only 60% of the housing units. The principle of clawing back contributions is not supported in any case, but requiring this at 60% completion is entirely unjustified by evidence, policy or regulations and could have a significant impact on the completion of strategic scale development sites in the Borough. Indeed, there are many risks to the development of the site, and its viability, that can occur in the later stages of a development which is of a significant scale and is carried out over a number of years where market conditions can fluctuate.

The Policy fails to set out a clear strategy for the delivery of infrastructure which is imperative to ensure the delivery of developments, especially strategic scale sites, in a timely manner. The Council must provide further information in relation to the infrastructure delivery strategy and the mechanisms for its delivery. Bloor Homes has held discussions with the Council on this matter in relation to the Sustainable Communities and in particular the early delivery of Land at Bratton. Indeed, the draft Design and Development Brief submitted to the Council in

respect of SC1 Land at Bratton sets out an appropriate strategy for ensuring the delivery of both the on-site and off-site infrastructure required to support the Sustainable Community. It has been proposed by BHL that off-site infrastructure delivery such as the new planned schools and highways infrastructure are by individual Section 106 Agreements with calculations based on an overall 'roof tax' figure. This is a method used by BHL on other sites of a similar scale. However, it is understood that the Council is unsupportive of this approach and are yet to set out a clear strategy for an alternative approach to enable developers to progress sites with certainty that the infrastructure impacts of development can appropriately and reasonably be mitigated.

In relation to on-site infrastructure, BHL are providing all of the key infrastructure on their land interests at SC1 Land at Bratton and there is a need to ensure fair and equitable delivery across the parties within the allocation. The draft Design and Development Brief has set out a clear and appropriate strategy to achieving this and an extract in relation to this is provided below.

"A mechanism will be agreed between the developers to ensure that the necessary funding is available at an early stage, as well as being proportionate and equitable between the constituent elements of the allocation site.

The development cost and land value will be aggregated and then split proportionately between the applications, with a proportion of the land value then discounted from the application that would provide the site for those facilities (anticipated to be the eastern site).

The payment of the financial contributions and the transfer of the serviced land to the Council (for the primary school) would then be secured by a Section 106 Agreement attached to each permission and once paid the developers should be free to proceed with deliver of the new homes without restriction."

As set out above, modifications must be made to Policy Strategic S7 to enable it to be found sound.

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