



Telford and Wrekin Local Plan Review
Examination in Public
Matter 5- Allocations
Boningale Developments Ltd
January 2026



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For and on behalf of Marrons			



1. Introduction

1. This response to Matter 5, Issue 1 of the Inspectors' MIQs in respect of the Telford & Wrekin LP Review (TWLPR) Examination in Public has been prepared by Marrons on behalf of Boningale Developments Limited.
2. This hearing statement should be read alongside previous representation to the Regulation 19 Consultation submitted by Marrons on behalf of Boningale Developments and should be considered in the context of support for a plan led system.
3. Acting on behalf of our clients, Marrons will attend the Matter 5 Hearing Session and make further oral submission on behalf of our client. This statement outlines Boningale's comments in respect of Matter 5, Issue 1, with responses to the Inspectors' MIQs (Matter 5) are set out below.
4. In order to assist the Inspectors', the contents of this submission and the submissions made in respect of other matters, demonstrate that the submission version of the Plan is not, in our assessment, capable of being found sound, without a lengthy pause in the examination, significant additional evidence and the identification of additional sites in sustainable locations to accommodate housing growth over the Plan period.
5. These submissions reflect the position outlined in recent correspondence between Housing Minister Matthew Pennycook and the Chief Executive of the Planning Inspectorate. in the Minister letter of July 2024 he noted that in relation to the continued use of 'pragmatism' in the Examination of Plans and the recognition that any fundamental issues or areas of additional work that require a pause of more than six-months in the Examination process, should indicate that a Plan is incapable of being found sound. In his letter of 9 October 2025 Minister Pennycook expressed support for pragmatic decisions to support the adoption of local plans, however noted that it is important that poor-quality plans are not adopted, and overlay long examinations avoided. In his letter of 27 November 2025, the Minister noted that whilst it is the Government's intention to not save the Duty to Cooperate when regulations for new-style plans come into force, LPAs should continue to collaborate across their boundaries, including on unmet needs from neighbouring areas, and plans should still be examined in line with policies in the NPPF on 'maintaining effective co-operation.'



2. Matter 5 - Allocations

Issue 1: Whether the allocations and their requirements are justified, effective, and consistent with national policy

- 0.1. **Q43. Are the site allocations in Appendix 15 justified? Do they accord with the development strategy? Are they deliverable/developable and supported by the evidence? Is the estimated housing number for each site a reasonable figure based upon the evidence?**
 - 2.1. As referenced in our regulation 19 representations (E154), Boningale Developments are promoting land at Tibberton Road, Tibberton, part of which is proposed to be allocated as site HO24, for an indicative 25 dwellings.
 - 2.2. A planning application (reference TWC/2024/0892) was submitted in 2024 for the wider land parcel. During the preparation and assessment of the application, working with the Council it was identified that there are capacity issues at the Cherrington Road Corridor, as well as the inability to provide access to the site from Hay Street. Access can be provided from Tibberton Road, and a solution to the capacity issues can be delivered. However, a larger site allocation, with a greater quantum of development will be required to deliver the proposed off-site highways mitigation. On this basis the allocation should be amended to comprise the full land parcel, with the indicative capacity increased to 85 dwellings.
 - 2.3. The site is suitable for development, with no significant constraints to development of the site, notwithstanding the off-site highways works. Tibberton contains a range of services and amenities to meet everyday needs, and the site can deliver much needed sustainable growth for the village, helping to maintain and enhance its vitality. The site is sustainably located close to a bus stop and within walking distance of village facilities.
 - 2.4. The site is deliverable, with a planning application submitted in 2024, and continues to be actively promoted for development, with potential for a revised planning application to be submitted in the near future. The site is available, and there are not legal or ownership impediments to its development.



- 2.5. Regarding the Telford and Wrekin allocations, we have serious concerns that the plan has an overreliance on large strategic sized sites on the fringes of Telford, as discussed in our responses in relation to Matters 2 and 3.
- 2.6. While the principle of directing growth to the edges of Telford is supported, the sheer scale and concentration of these allocations on the edge of Telford is disproportionate. This approach does not represent a balanced distribution of growth, directing only minimal growth to rural locations, limiting opportunities to sustain the vitality of rural centres.
- 2.7. This disproportionate concentration of growth around Telford also has significant implications for infrastructure capacity. Without clear evidence that these locations can be adequately serviced, there is risk that the disproportionate development could adversely impact existing residents and increase pressure on essential services and facilities.
- 2.8. Further, the plan's overreliance brownfield land risks the deliverability of the plan. . Whilst the use of brownfield and previously developed land is supported, the plan places significant reliance upon these sites, many of which are likely to present physical constraints such as contamination and the presence of existing or ongoing uses. Delivering affordable housing on brownfield sites can often be challenging due to viability constraints. There is therefore a pressing need to allocate a more diverse range of sites, including those that are sustainably located within the rural areas, to facilitate the delivery of affordable housing and minimise viability issues.
- 2.9. It is essential to allocate a diverse range of sites to ensure a consistent and reliable supply. reduce risk, but also provide opportunities for SME builders, strengthening market resilience and competition, in accordance with Paragraphs 72 and 73 of the Framework.
- 2.10. In addition, a number of sites identified in the current draft Local Plan have a history of previous allocations or planning application, some of which were refused while others have not progressed to implementation. For these sites to be retained as allocation, it should be clearly demonstrated that any constraints to their delivery have been understood and can be resolved to ensure the proposed allocations are effective, justified, and capable of contributing meaningfully to the overall soundness of the plan.



- 2.11. **Q44. Are the requirements within Policy HO1 justified, sufficiently clear and unambiguous?**
- 2.12. Draft Policy HO1 is not considered to be justified, clear or unambiguous.
- 2.13. This policy contains an extensive list of requirements. We consider that this imposes overly prescriptive expectations that do not adequately reflect the variation in site scale, viability or distinguish between the requirements for outline and full applications.
- 2.14. Regarding clarity and unambiguity, this policy contains broad terminology and lists requirements that are open for interpretation. The Council need to clearly define phrases such as “identified need to work together” which currently does not disclose how such needs will be identified, by who, or by what criteria. While paragraph 9.9 does provide context, it does not translate into explicit policy requirements. We consider that the policy wording must be significantly clearer to provide meaning and unambiguous guidance, avoid unnecessary delays, and ensure sufficient flexibility so that other sustainable forms of development are not inadvertently restricted.
- 2.15. **Q45. Do any of the proposed site allocations in Appendix 15 have specific requirements which should be set out in the Plan?**
- 2.16. The above is best articulated by the assessment included at Appendix 1 that demonstrates that the evidence presented within the Telford and Wrekin Housing Allocations – Site Assessment document (Ref: AS02) identifies several technical constraints and unresolved issues. These matters have not yet been adequately addressed and if left unresolved, are likely to preclude the delivery of more sustainable development from coming forward.
- 2.17. **Q46. Do the ‘carried forward’ employment allocations need to be included in the Plan for it to be sound?**
- 2.18. No response.



- 2.19. **Q 47. Are each of the Sustainable Communities (SCs) allocations and their policy requirements justified, deliverable/developable, consistent with national policy and supported by the evidence? Do they accord with the development strategy of the Plan?**
- 2.20. Draft Policy HO2 sets out the broad visions for all three Sustainable Communities, seeking to deliver mixed-use developments that appear to broadly align with national policy aims to create healthy, inclusive and safe places. However, the evidence does not demonstrate that the allocations are entirely justified, deliverable or consistent with national policy when taken together.
- 2.21. The policy lacks site-specific detail throughout on constraints and necessary mitigation. SC1 contains a Grade II listed building whose rural/open setting is acknowledged, yet mitigation is framed only as generic buffers and screening with no defined stand-offs, view corridors or height limits. SC1 also carries a substantial “forest community” and green infrastructure requirement (structural landscaping, green network extension, Silkin Way links, woodland retention/new planting) that implies significant land-take and has not been quantified or reconciled with capacity, further weakening the justification.
- 2.22. Further, the Council has failed to provide clear phasing and funding plans or coordinated to provide certainty about the viability and timescales for the delivery of required infrastructure. All three SCs rely on front loaded, inter-dependent infrastructure without secured mechanisms, phasing or costing plans. For example, the Plan relies on SC3 to deliver a secondary school site for all three sustainable communities, using a Section 106 “compensation mechanism”, meaning there are education dependencies on the delivery of one particular SC. The Plan also requires each SC to deliver “highway and transport to an agreed phasing plan”, and this must be approved by undertakers. Yet, HO2 does not embed those plans, or responsibilities in policy, leaving critical path items unsecured. Furthermore, SC3 requires maintenance of the functionality of the Northern Interceptor Channel as a strategic drainage asset. Yet, the Plan does not evidence how the development can proceed without compromising this asset. Each of the sites are mutually dependant, infrastructure heavy, yet provide no evidence to suggest they are indeed deliverable and developable.



2.23. HO2 uses ambiguous language such as “appropriate mechanism” and “brought forward through a plan”, contrary to Paragraph 16d of the NPPF, that requires clear, unambiguous policies.

2.24. **Q 48. Does the evidence support the expected delivery trajectory on each site? Does the market and other evidence take account of all three SCs seeking to deliver housing at a similar time in a similar part of Telford?**

2.25. While the draft Plan identifies indicative build-out rates, it does not provide the underpinning technical, market or infrastructure evidence require to demonstrate simultaneous delivery of three large scale sites in the same part of Telford is realistic. An absence of infrastructure-aligned phasing undermines the trajectories as all three SCs depend on major infrastructure being delivered before or alongside housing. Instead, the information set out in the Draft Infrastructure Delivery Plan March 2025 (Ref: IS01) describes phasing very vaguely, with the Council stating that they will be “identifying an appropriate strategy for the phasing” and that “infrastructure should be identified to support the growth”. This suggests that there is no clear plan to suggest how quickly each site can be delivered following permission, nor is there confidence that the infrastructure to support such growth will be aligned with delivery.

2.26. Furthermore, as set out above in our response to Q47, many of the allocations are subject to cross-site dependencies, that depend on multiple developers coming forward at pace and remaining viable. Such multi-party contributions are inherently sensitive to delays, negotiation challenges and viability pressures, meaning any slippage on one site could undermine timely delivery of a critical piece of shared infrastructure. As such, the requirement for SC3 to provide land for a secondary school serving SC3, SC1 and SC2 introduces a major delivery uncertainty, as the Plan merely refers to an “appropriate mechanism” in a Section 106 agreement to compensate for any over-provision of land and build costs. It does not set out how this mechanism will operate, when contributions will be triggered, or how delivery will be secured if one or more sites come forward more slowly than expected. In the absence of defined triggers, responsibilities and funding arrangements, there is no clear or reliable delivery pathway for this critical cross-site education infrastructure.



2.27. It is also unclear whether the current market can sustain concurrent delivery of this scale in a similar part of Telford, nor whether the trajectory is realistic, and evidence on this point is absent.

2.28. **Q 49. Do any of the proposed requirements of Policy HO2 for each site conflict with or duplicate the other policy requirements of the Plan?**

2.29. Several elements of Draft Policy HO2 have duplicated and reiterated requirements that are already addressed elsewhere in the plan, such as provisions for accessible and diverse housing (repeated in Policy HO3) or provisions for a sustainable travel network (repeated in Policy ST1). Policy HO2 lacks specificity and distinct guidance for the strategic allocations and should be amended appropriately to reduce varied interpretation.

2.30. **Q 50. Will Policy HO2 and the approach it proposes to bringing the sites forward be effective in ensuring that all the requirements for each SC can be achieved?**

2.31. The available evidence presented in the Site Allocations section of the evidence base states that each SC site has notable constraints which must be resolved in order for development to take place, meaning that whilst each site is not inherently unsuitable, they do require significant mitigation. However, Policy HO2 does not provide sufficient detail or demonstrate any certainty of how or when these constraints will be addressed, and there is not a sufficient framework to ensure all infrastructure will be provided to support the growth of each SC. As discussed above, critical infrastructure requirements are not supported by defined delivery pathways, costing or phasing. As a result, this policy does not provide any confidence that its approach and requirements can be achieved when bringing the sites forward.

2.32. **Q 51. Does the evidence demonstrate that all three SCs are viable in respect of delivering all the requirements of Policy HO2 and other relevant policies of the Plan when taken together? Are any of the SCs reliant upon external funding?**



2.33. Whilst the Council believe that the allocations are capable of delivery, the evidence does not support this in respect to delivering all requirements when taken together. The Infrastructure Delivery Plan (March 2025) suggests that the Council, “does not consider that there are any unfunded critical projects that would prevent the delivery of the Local Plan including housing and employment growth”, yet it is noted there is an infrastructure funding gap. Indeed, the sites are deemed viable and capable of delivery, but there is a lack of site specific evidence to demonstrate that each SC can viably deliver the significant infrastructure and other policy requirements

2.34. Each SC carries significant and costly burdens; SC3 is required to provide land for a secondary school to serve SC1, SC2 and SC3, with an undefined “compensation mechanism” for land and build costs, yet no evidence is provided that this can be viably secured or that all developers can contribute proportionately. SC2 must deliver two 2FE primary schools, extensive highways upgrades, a mobility hub and substantial utilities infrastructure, but there is no testing of whether these early, front-loaded requirements are deliverable while maintaining a viable development. SC1 faces costs associated with heritage mitigation, strategic Green Infrastructure, and contributions to a secondary school it does not control, again without any viability modelling.

2.35. When taken together, the Plan relies on various funding and phasing, none of which have been confirmed, or tested cumulatively. As a result, there is no evidence that sufficiently demonstrates that the three SCs are viable in delivering the requirements of Policy HO2 due to their reliance on unconfirmed external funding.

2.36. **Q52. (a) Is the employment land requirement in each of the SCs justified? (b) Does the policy include sufficient clarity and/or flexibility around the quantum, location and type of non-residential development to be delivered in the SCs?**

2.37. No response.

2.38. **Q 53. How have the impacts of growth planned in the SCs on infrastructure and flood risk, individually and cumulatively, been assessed and where is this set out?**



- 2.39. Within the Local Plan and Policy HO2, it is not clear that the growth planned within the SCs regarding infrastructure and flood risk has been appropriately assessed or set out in a comprehensive manner.
- 2.40. Although Policy HO2 references that there is a requirement to provide an active and sustainable travel network, enhance transport facilities, educational provisions, utilities and green infrastructure, it is vague in relation to infrastructure requirements, capacity assessments or clear phasing plans, nor is there evidence to suggest that the cumulative impacts across all SCs have been considered. As such, for transport infrastructure it is stated that a phasing plan be agreed upon “as soon as possible” yet this is vague and does not state that there will be coordinated delivery to support the scale of growth that has been proposed.
- 2.41. In relation to flood risk, the policy states within the delivery section that recommendations from the Level 2 Strategic Flood Risk Assessment (Ref: WF02) outcomes should be incorporated within the site. Yet, none of the allocations include detailed flood risk modelling or site-specific mitigation strategies, and no cumulative consideration is given to the effect of concentrated development in the same part of Telford. As this has not been further developed to say whether the growth will impact this, or if this will influence other areas.
- 2.42. Overall, we believe that without clarity regarding infrastructure requirements, impact assessments, and thorough flood risk mitigation plans and analysis, it is not possible to say whether impacts have been assessed. This absence does not provide confidence in the SCs abilities to have the measures in place to support their growth during the plan period.

2990 words.



Appendix 1 – Site Allocations Review



HO6 – Land South of Holyhead Road, Wellington, TF6 5BF (Site ID 251) –

Estimated 105 dwellings

Issues identified in site appraisal	Comments
Highways	<p>The access for the site “would not be viable via the bypass and would need to be set off Wellington Road”, with existing on-street parking issues; mitigation is framed as possible via “highway infrastructure improvements and careful design” at application stage.</p> <p>Further, Stage 7 states careful consideration will be needed for density/design due to access arrangements and on street parking.</p> <p>The fact that access options to the site are highly constrained, and mitigation relies on unspecified “highway infrastructure improvements and careful design” creates uncertainty about whether a safe and suitable access can in fact be achieved. Stage 7 reinforces this concern by noting that these access limitations are significant enough to restrict density and layout, indicating that a safe and deliverable access is not guaranteed.</p>
Drainage, flood risk and sewer capacity	<p>Severn Trent have “reported capacity issues downstream” and there is an expectation that developers will contact Severn Trent at application stage “to ensure additional capacity can be planned for”.</p> <p>Watercourses and culverts cross the site and public open space must be provided in the layout; stated as mitigable at application.</p> <p>There is an area of ponding and a flow route across top/eastern boundary.</p> <p>This information suggests that the site faces multiple, overlapping drainage and sewer capacity constraints. The downstream capacity issues identified by Severn Trent means upgrades may be needed before development can proceed. Watercourses, culverts, ponding and surface water constraints further limit how the site can be designed. The unresolved infrastructure and flood risk requirements indicate that significant mitigation is needed, which is currently unspecified in order for development to be deliverable.</p>



Deliverability / reliance	<p>The assessment in ASO2 repeatedly positions key constraints, such as limited sewer headroom, watercourse corridors, parking/access issues) as matters to be addressed at a future application stage rather than demonstrated deliverable at allocation stage.</p> <p>This approach leaves fundamental infrastructure requirements and design implications untested, creating uncertainty over what the site can realistically accommodate.</p>
Technical Conclusion	<p>The site is proposed for allocation despite acknowledged downstream sewer-capacity limitations, the presence of watercourses and culverts that constrain layout and require careful hydraulic management, and recognised access and on-street parking constraints. Importantly, the assessment relies on future design work, mitigation measures, and consultation rather than demonstrating at plan-making stage that these issues can be feasibly resolved. When taken together, this indicates that key infrastructure and capacity requirements remain untested and supports the position that the site carries unresolved deliverability risks at the point of allocation.</p>



HO17 - Land East of Vasey Court and South of Barnfield Road, TF6 5BF
(Site ID 378) – Estimated 45 dwellings

Issues identified in site appraisal	Comments
Highways and cumulative impacts	<p>The assessment identifies that a pre-application for 45 dwellings raised concern about “quantum of development served off a single access point” and indicates only “modest scale development” would be considered appropriate, with further detail developed at Stage 8.</p> <p>The assessment states “cumulative traffic impacts on the M54 will need to be taken into account.” This indicates that development at the site could contribute to wider pressures on the strategic road network, beyond the immediate local highways impacts. It also highlights that further technical work would be required to demonstrate that additional traffic can be safely and acceptably accommodated, which introduces uncertainty at the plan-making stage.</p>
Drainage, flood risk and sewer infrastructure	<p>The assessment states, “cumulative development may be an issue with existing sewer infrastructure” and that highway drainage is known to be limited, with further development of this in Stage 8. It also notes a surface water flow route close to the western boundary.</p> <p>The assessment suggests that the site faces notable drainage and sewer-infrastructure constraints, with limited highway drainage, potential cumulative pressure on the existing sewer network, and a surface-water flow route along the western boundary. These factors indicate elevated risk and a need for further technical work before the site could be considered suitable for development.</p>
Deliverability / reliance	<p>Multiple issues are explicitly framed as matters for a future planning application, including Severn Trent upgrades/highway contributions being “suitably mitigated”.</p> <p>This reliance on later, unspecified mitigation creates uncertainty about deliverability and suggest that the site cannot currently demonstrate that its infrastructure need can be met.</p>
Technical Conclusion	The site is subject to a combination of highways, drainage, and deliverability constraints that collectively undermine its



	suitability for allocation. Concerns remain about the scale of development that can be served by a single access, alongside the need to address cumulative impacts on the M54, and drainage and flood-risk issues add further complexity.
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HO5 – Land North of Allscott Meads (Parish Wrockwardine) – Estimated 105 dwellings

Issues identified in site appraisal	Comments
Highways	The Highways officer has expressed concern about the area's ability to accommodate additional traffic, to the extent that they explicitly recommended that there is " merit for lower yield " because the area is " sensitive to traffic ". The significant reduction in the site's allocation from 350 dwellings at Regulation 18 to 105 reflects these constraints and suggests that the network cannot realistically support higher levels of growth.
Infrastructure capacity	Stage 7 explicitly states the site " needed to be reassessed " given Allscott Mead build-out and impacts on school capacity and highway infrastructure . This indicates that the cumulative impacts of the development could place additional pressure on infrastructure capacity, and thus materially affect the site's suitability. It also reinforces that education and highway capacity constraints remain unresolved and require further evidence before the site's development potential can be confidently relied upon at plan-making stage
Deliverability / reliance	Stage 8 concludes that heritage/drainage issues can be dealt with at planning application, but the schedule still contains explicit reassessment triggers and a highways-driven yield concern.
Conclusion	As indicated in the ASO2, Land North of Allscott Meads remains constrained by highway and infrastructure issues, evidenced by a substantial reduction in yield and the Highways officer's views that the area is highly sensitive to additional traffic. Although Stage 8 suggests that some of the matters could be addressed at application stage, the continued presence of reassessment triggers and highway-driven limitations indicates that key deliverability concerns remain at the plan-making stage.



HO2 – Old Park (Site ID 716) – Estimated 200 dwellings

Geotechnical	The Geotechnical officer stated that there are “ multiple mine shafts on site ”, requiring a geotechnical assessment at a future application. As a geotechnical assessment is needed for future applications, risk are currently not quantified or understood and this creates uncertainty regarding whether or not the site can be safely developed. The presence of mine shafts may render significant parts of the site undevelopable, add substantial abnormal costs, and affect potential sales values, which may make delivery unviable.
Ecology	The Ecology officer identified potential habitat constraints that are still being “ actively investigated ”, with seasonal surveys required to understand their extent. As a result, this “ may, or may not, affect layout and/or density ” and states “ further investigation is needed. ” means that key ecological risks remain unresolved and may result in significant ecological impact or design restrictions.
Flood risk	The SFRA clarified that there is ponding with mine water flooding potential , indicating that the site is affected by complex and potentially hazardous flood mechanisms that extend beyond typical surface-water flooding. This creates uncertainty over whether safe development can be achieved and whether the required mitigation would be technically feasible or financially viable.
Deliverability / deferral	The Regulation 19 conclusion explicitly states technical constraints from geotechnical and ecology “ will require further investigation to alleviate concerns. ”.
Technical conclusion	Old Park carries significant unresolved technical risks, including multiple mine shafts requiring geotechnical investigation, ecological constraints pending seasonal surveys, ponding with mine water potential, all of which could affect layout and density. As confirmed at Regulation 19, these matters will require further investigation to alleviate concerns, indicating that key deliverability issues remain untested at the plan-making stage.



HO12 – Land West of Wellington Road, TF4 3BP (Site ID 187) – Estimated 70 dwellings

Sustainability/service access	<p>This is problematic because the site shows poor accessibility to key services, which undermines its suitability and sustainability credentials. A local centre at 770 m is towards the upper end of acceptable walking distances, reducing convenience and likely increasing car dependence. Limited proximity to public transport means future residents would be less able to meet daily needs locally, generating higher travel demand and placing pressure on already stretched infrastructure.</p> <p>Overall, these factors indicate that the site performs poorly in terms of access to services and is therefore less likely to support sustainable patterns of development.</p>
Highways	<p>Comments from Highways noted that access “would not be viable via the bypass and would need to be set off Wellington Road”. However, Wellington Road already experiences notable on-street parking pressures, which constrain carriageway width, reduce visibility, and limit safe vehicle movements.</p> <p>The assessment frames mitigation as achievable through future “highway infrastructure improvements and careful design,” but this is left entirely to the planning application stage with no evidence at allocation stage that such measures are technically or financially deliverable.</p>
Drainage, flood risk and sewer capacity	<p>Severn Trent have reported capacity issues downstream requiring the developer to confirm flows and connection points at application stage before any additional capacity can be planned, indicating that the existing network may not currently support the development.</p> <p>In addition, watercourses and culverts cross the site and must be accommodated as part of the layout, likely reducing developable area and imposing design limitations. The SFRA further records an area of ponding along the eastern boundary and a surface-water flow route across the top of the site, highlighting existing flood-risk mechanisms that will require mitigation.</p>
Technical conclusion	<p>In summary, the site presents multiple unresolved constraints that affect its sustainability and deliverability. It performs poorly in terms of access to key services, with Stage 3 identifying limited proximity to GP and rail provision. Highway access is restricted to Wellington Road, where existing on-street parking issues create uncertainty over whether a safe junction can be achieved without significant, untested mitigation. Sewer capacity constraints identified by Severn</p>



	Trent, combined with on-site watercourses, culverts, ponding, and a surface-water flow route, further highlight infrastructure and flood-risk sensitivities.
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HO18 – Old Railway Line, Church Aston (Site ID 705) – Estimated 41 dwellings

Highways	<p>Access to the site is dependent on a single-track road with no dedicated pedestrian provision, which limits the available carriageway width and already constrains two-way vehicle movements. This approach is further restricted by the need to cross a narrow historic railway bridge, where the Highways Officer notes the structure is “too narrow to form an access to a development of this scale.” The combination of limited road width, the absence of footways, and fixed structural constraints at the bridge results in a tightly constrained access corridor, with little scope for meaningful alteration.</p> <p>Additional visibility and PROW conflicts further limit the ability to achieve a safe junction, with Stage 10 noting that “reasonable access will need demonstrated”.</p>
Drainage	Comments from the Drainage and Flood Risk Officer note that it is “ not clear on whether gravity drainage outfalls would be possible ,” indicating that the basic feasibility of directing surface water away from the site has not yet been established. The assessment points to the need for further investigation at planning application stage to determine whether an appropriate outfall exists and what form of mitigation would be required.
Deliverability / deferral /	The Stage 10 conclusion notes that the matter of highways access will need to be addressed in more detail at planning application stage, acknowledging that the outcome “could impact unit numbers.” While this defers key considerations to a later process, no indicative evidence is provided at allocation stage to show how the identified constraints might realistically be resolved or what scale of development the network could support.
Technical conclusion	The Stage 10 assessment identifies a series of unresolved highways and drainage matters, including the reliance on a single-track access with no footways, the constraints of the narrow historic railway bridge, visibility and PROW interactions, and uncertainty over whether gravity drainage outfalls are achievable.



	<p>In the absence of evidence demonstrating how these issues can be accommodated within the assumed development parameters, there remains a degree of uncertainty around the site's capacity and its ability to support the scale of development currently anticipated.</p>
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HO22 – Former Bush Hotel, Hadley, TF1 5NL (Site ID 334) – Estimated 27 dwellings

Highways	<p>The Stage 5 summary notes the Highways Officer's view that accommodating around 10 dwellings "would likely be too many due to awkward access arrangements," signalling that the capacity of the site is intrinsically linked to access limitations. Stage 8 reiterates this position, confirming that the identified access point is "severely constrained" and may only be capable of supporting a private-drive-type arrangement rather than a standard adoptable access. For any higher quantum of development, Stage 8 indicates that a "robust access arrangement" would need to be demonstrated at planning application stage, yet no evidence is presented at allocation stage to show that such an arrangement is physically or technically achievable within available land.</p>
Heritage	<p>Heritage comments in Stage 8 confirm that the scale and form of development will need to respond sensitively to the historic context, noting that density is likely to be affected as part of this process. The assessment indicates that an appropriate density would need to be agreed at the planning application stage, with the intention of balancing heritage considerations alongside the access-related constraints already identified. However, no indicative testing is provided at allocation stage to demonstrate how these combined sensitivities might influence the developable layout, building heights, or overall yield.</p>
Technical conclusion	<p>Overall, the Stage 5 and 8 assessments highlight that the access geometry imposes a significant degree of constraint, with the Highways Officer advising that even around 10 dwellings "would likely be too many" given the awkward nature of the access. Stage 8 further confirms that the preferred access point is "severely constrained" and may only support a private-drive-type arrangement, with any higher quantum reliant on demonstrating a more robust solution at application stage. Heritage comments also indicate that density will need to be moderated to respond appropriately to the site's historic context, with the final form and intensity of development to be agreed through future design work.</p> <p>Overall, these inputs show that both access parameters and heritage sensitivities have a direct bearing on achievable density, with the ultimate development capacity contingent on resolving matters that have not yet been tested at allocation stage.</p>



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