

Barratt Redrow

Telford Local Plan Examination: Matter 5

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 5 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 43, 44, 45 and 46.
- 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 43: 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 identified in response to Questions 36 and 37 (Matter 4), the Local Plan Development Strategy and strategic policies (page 25): propose that the amount of development for Telford, Newport and the rural area of the Borough will be based on a broad split of existing population levels; highlights that Newport plays a key role in the Borough's economy; and notes that the economic role of Newport has increased with the development of the Newport Innovation Park (Ni.Park).
- 2.2 The proposed new employment allocations EC2, EC3 and EC4, within a Strategic Employment development area on the edge of Newport, will assist with ensuring that Newport can continue to play a key role in the Borough's economy as well as capitalise on the success of existing businesses and sectors whilst providing a flexible and responsive opportunity to support a diverse range of other employment-generating activities and sectors.
- 2.3 Site allocations EC2, EC3 and EC4 are located on the edge of the second largest urban area in the Borough, adjacent to existing and proposed commercial development, and benefit from direct access to the A518 and A41, as well as close proximity to the M54. In particular, allocations EC2, EC3 and EC4 provide sufficient size to accommodate a range of employment uses and thereby assist with ensuring that the employment land supply for the Newport sub area can provide a flexible and resilient response to the employment market over the new Local Plan period. These sites score favourably within the Site Assessment reporting¹ and are available to come forward for development in the immediate term. These sites are therefore deliverable and can thereby make a significant contribution to meeting the employment land requirements and vision set out within the Publication Version of the Local Plan (CD01).
- 2.4 The allocation of Sites EC2, EC3 and EC4 for employment development is accordingly deemed to be both justified and consistent with the development strategy set out in the Publication Version of the Local Plan (CD01). Given the sustainable location of these sites it is considered that they also provide an opportunity to incorporate an element of mixed use development should the need arise (please also refer to the response to Matter 3 Question 27).

Question 44: Are the requirements within Policy HO1 justified, sufficiently clear and unambiguous?

- 2.5 Policy HO1 identifies that allocations have been proposed to contribute to meeting the housing requirement for the Borough. Barratt Redrow is not seeking to comment on any of the individual housing / mixed use site allocations proposed within the Publication Version of the Local Plan (CD01). It will however need to be borne in mind that if the housing requirement for Telford increases, in response to the Black Country unmet need (as discussed in response to Matter 3 Question 27), then additional housing sites will need to be identified.
- 2.6 Barratt Redrow is promoting land (Call for Sites reference 397) for residential development (circa 250-300 dwellings). The Site is immediately adjacent to Newport which is the second largest settlement in the Borough and therefore a targeted location for housing growth. A Concept

¹ AS03. Telford and Wrekin Telford and Wrekin Employment Allocation - Site Assessments - April 2025.

Masterplan was submitted with the response to the Local Plan Regulation 19 consultation in order to demonstrate how residential development could be accommodated on site reference 397. This site is deliverable and available immediately for residential development should additional housing sites need to be identified.

- 2.7 Specifically in relation to the requirements listed within Part 2 of Policy HO1, it should be noted that the definition of major housing development set out in the NPPF is sites of 10 or more dwellings or 0.5ha or more in size, which accordingly captures the majority of the housing allocations identified at Appendix 15. If the policy is intended to capture sites of 100+ dwellings, as suggested by paragraph 9.7, then this should be explicit within the policy wording.
- 2.8 Furthermore it is considered that there should not be a need for the submission of a Design Brief (Part 2b) for all major planning applications for individual housing developments. The National Validation requirements stipulate that planning applications for major development already need to be accompanied by Design and Access Statements, which should be sufficient to set out the supporting design rationale for planning application proposals for most individual housing allocations.
- 2.9 It is however accepted that there can be benefits for the production of a Design Brief where development proposals cross multiple individual housing sites or to support and inform the approach to be taken for some new large sustainable communities, in order to demonstrate how comprehensive development can be achieved. It is considered that the policy should therefore clearly state which housing allocations / development proposals would require the production of a Design Brief and justification should be provided for why this is deemed to be necessary.
- 2.10 Further clarity is required as to when the information sought by Policy HO1 is required. The proposed policy wording states that the information is required to support planning applications, whereas supporting paragraph 9.8 states that the information should be provided at an early stage in the planning process. It is therefore not clear whether the Council is seeking for this information to be submitted with the planning application submission or during the pre-application stage. If it is the latter then this would place an unreasonable burden on the applicant and would have the potential to vastly extend the overall planning application timescales.

Question 45: Do any of the proposed site allocations in Appendix 15 have specific requirements which should be set out in the Plan?

- 2.11 As set out in response to Question 44, the Council should identify which specific site allocations are considered to require the submission of Design Briefs, along with justification for why this is deemed to be required.

Question 46. Do the 'carried forward' employment allocations need to be included in the Plan for it to be sound?

- 2.12 The December 2024 NPPF (paragraph 8) identifies that within the economic objective of the NPPF there is a need for sufficient land of the right types to be available in the right places and at the right time. Furthermore the December 2024 NPPF (paragraph 23) states that land use designations and allocations should be identified on a Policies Map. If allocations which are being relied upon are excluded from the Local Plan then it would not be clear how it could be demonstrated that the Plan has been positively and effectively prepared.
- 2.13 Therefore any 'carried forward' employment allocations which have not yet been subject to built development proposals and are being relied upon as part of the Borough's employment land supply within the Local Plan in order to meet and justify the Local Plan development strategy should be

included in the Local Plan. This is particularly the case where new employment allocations are being proposed adjacent to, and as an extension of, current employment allocations, as is the case for proposed allocations EC2, EC3 and EC4.

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