

MATTER 5 (ALLOCATIONS) - ISSUE 1: WHETHER THE ALLOCATIONS AND THEIR REQUIREMENTS ARE JUSTIFIED, EFFECTIVE, AND CONSISTENT WITH NATIONAL POLICY

This statement responds to Matter 5, Issue 1, point 43 of ID04 (Inspectors' MIQs). This statement concerns our client's (The Parkhill Group) site which is included within the LPR submission version as a draft site allocation - **HO8 East of Dawley Road**.

Each part of point 43 is addressed in turn below.

"Are the site allocations in Appendix 15 justified?"

Yes, we believe site allocation HO8 is justified. Para 36 of the NPPF (December 2024) clarifies that plans are sound if they meet certain criteria. One of these criteria includes that they are 'justified'. 'Justified' is explained as "*an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*"

With regard to background evidence, EH01 (EHDNA update, February 2025) provides a robust and up to date evidence base against which the emerging Local Plan has been prepared. EH01 builds on previous evidence which fed into and informed the earlier stages of the plan-making process. It sets out the chronology of evidence-based documents that have informed the Local Plan policies on housing needs. In addition to EH01, the evidence base includes the EHDNA parts 1 and 2 (EH03 and EH03a), the Housing Requirement Technical Paper (EH05), and Assessment of Affordable Housing Needs and Housing Mix (EH04).

NPPF, para 72 requires the local authority to have a clear understanding of land available in their area through preparation of a SHLAA and to identify a sufficient supply and mix of sites, accounting for their availability, suitability and likely economic viability. AS01 (T&W Site Selection Technical Paper, March 2025) demonstrates that the site has been selected following appropriate methodology. This includes considering sites put forward through two separate calls for sites and the SHELAA process. A ten-stage methodology, adapted from an initial seven stages, to respond to Reg 18 consultation responses was then followed. The site selection process has followed assessment of the broad areas for growth being twin tracked with the site allocation process and para 4.1 of AS01 confirms, "*all sites have been assessed on best available info.*"

PD03 (Integrated Impact Assessment Non-Tech Summary, Jan 2025 - pages 16-17) proceeds to explain that all reasonable sites were assessed at multiple stages throughout the plan making process to help inform appraisal of options as well as to aid the decision-making process on site allocations. It states this methodology has ensured a consistent approach was used to consider each individual site against a series of criteria which linked to the assessment framework and objectives. It confirms the appraisal process considered the plan "*as a whole*" i.e. proposed strategy, site allocations and all supporting policies that will shape future development.

AS02 (T&W Housing Allocations - Site Assessments, April 2025 -pages 131-132) confirms there are no hard constraints identified on the site and concludes it is suitable, available and achievable. Whilst the assessment notes the site is greenfield, the LPR (CDO8, para 4.5) recognises that growth beyond the existing boundary of Telford is critical to protecting the town's green spaces. It also notes that careful consideration of highways and geotechnical issues will be needed at the planning application stage. AS02 confirms that the site is adjacent to the built-up area and due to its low value use as grazing land, the council considers it appropriate for allocation. The assessment also confirms that there are a number of sites of this nature within Telford that have successfully been brought forward for development overcoming constraints from past uses.

Site allocation HO8 can therefore be concluded to be justified, having been robustly considered through an appropriate methodology with clear identification of its suitability to be brought forward.

"Do they accord with the development strategy?"

CD08 (T&W LPR submission version, Sept 2025 - page 24) states the Development Strategy is to continue to plan development based on the areas of Telford, Newport and the rural area of the borough. The majority of growth in Telford is expected to be in or on the edge of Telford through sustainable extensions to the urban area, recognising that growth beyond the existing Telford boundary must occur. It states the Local Plan has identified a housing requirement of around 20,680 over the Plan period 2021 to 2041, of which around 17,785 homes are planned for in and on the edge of Telford.

Strategic Policy S4 (Housing delivery strategy) sets out the overarching housing strategy which establishes the borough's approach to meeting its housing requirement. Policy S4 confirms the 20,680 housing requirement - an annual requirement of 1,034 homes. This includes an offering of 153 dwellings per year over and above the borough's housing need towards the black country's unmet need. To meet housing need, policy S4 states that housing development will be supported and delivered through a number of means - one of these includes allocation of new housing sites as shown on the policies map and in accordance with policy H01. The policies map includes allocation HO8 as a new housing site and extends the built-up area to include the allocation.

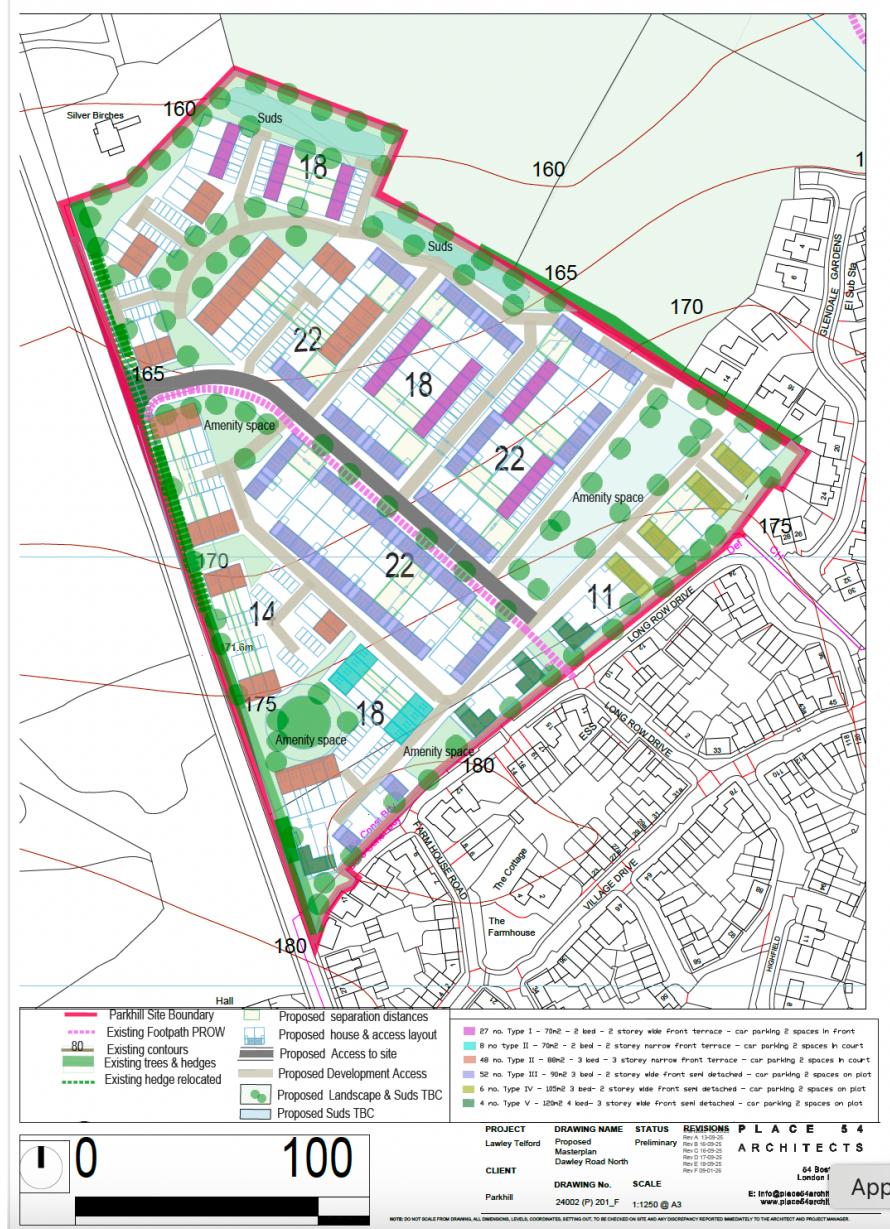
Site allocation HO8 therefore accords with the development strategy.

"Are they deliverable/developable and supported by the evidence?"

With regard to deliverability, our client has confirmed through the earlier stages of the Local Plan review that it owns the site and that it is available for development. Pre-application discussions have been held with the Council for a c.145 unit proposal at which the council suggested further information is required to demonstrate how 145 units could be accommodated on site to meet policy requirements - especially regarding amenity standards, separation distances and car parking. The Council also noted potential highways capacity constraints and need for appropriate mitigation.

Parkhill has assessed the site for proposed residential use and has started to progress design options, taking into account technical matters such as ecology, topography, transport, geotechnical and landscaping (to name a few). These initial investigations and work go some way to addressing the planning application requirements set out by policy HO1 (Housing Allocations). From this initial work, Parkhill is confident that residential development on the site is viable and could be delivered within five years. Parkhill Group has considerable experience (over 35 years) in delivering sites previously used for opencast coal mining and remediating brownfield land.

The latest masterplan (addressing pre-application comments) is included at Fig.1 below.



Site layout and access has been informed by geotechnical and topographical considerations. The most efficient layout has been achieved by locating access streets above a loop of land 15-30m wide which was identified by DCE Services as less suitable due to geotechnical constraints, albeit whilst the perimeter edge and central area are affected by the below ground conditions, these are confirmed suitable for built development. Figure 2 below shows an illustrative Geotech exclusion zone derived from DCE Services' Assessment which has helped inform the developable area.

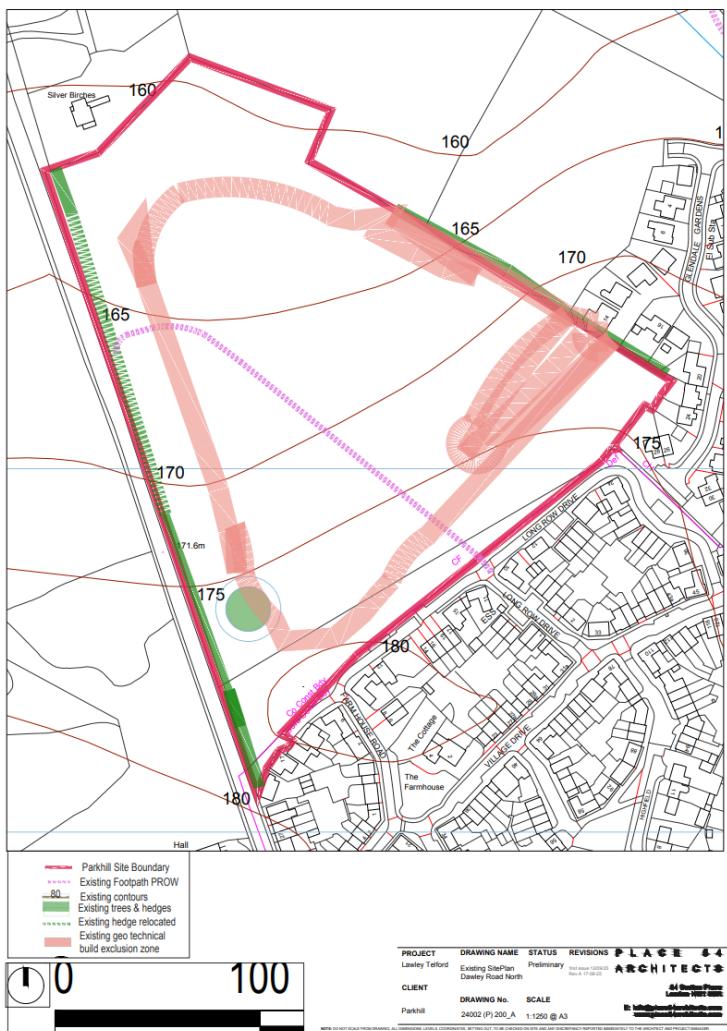


Figure 2: Plan illustrating geotechnical build exclusion zone

The proposed dwellings include terraced and semi-detached homes with rear gardens (10m depth) maintaining policy compliant separation distances between rear elevations. The Masterplan ensures connectivity between homes, open space and public transport. Car parking is provided on plot, alongside and between the detached and semi-detached houses, with frontage car parking or car parking courts for the terraced houses. At the perimeter edges, homes are organised as corner plots to provide active frontage towards the perimeter as well as fronting the access streets. In addition to private amenity space to individual homes, communal open space with equipped play is proposed to the south of the site, providing connectivity with Lawley village.

Additional tree planting to the north on the lower slopes will create a transition to Ketley Brook with linear swales for drainage linking to a retention basin in the north-east corner of the site. The current Masterplan therefore demonstrates that a successful design can be achieved to accommodate c.145 homes, meeting requirements on parking, amenity etc.

On highways, mode transport planning (mode) has reviewed the principle of vehicular access from the adjacent highway network and the sustainable access strategy that could be delivered, based on c.150 dwellings. This is to help provide assurance to the Local Highway Authority (LHA)/ Local Planning Authority (LPA) that a scheme is deliverable subject to a formal planning application being made. Pre-application discussions with the LPA and the LHA have taken place.

The work by mode to date has focused on accessibility, access and internal layout, and impact.

The Department for Transport's (DfT) new Connectivity Tool is considered to inform the assessment and selection for sites for development. This tool confirms that the majority of the site (inclusive of the pedestrian access into the site off Long Row Drive) falls within band B (the second highest connectivity within the 10 bands). An illustration of the site's DfT connectivity is provided in Figure 3 below.

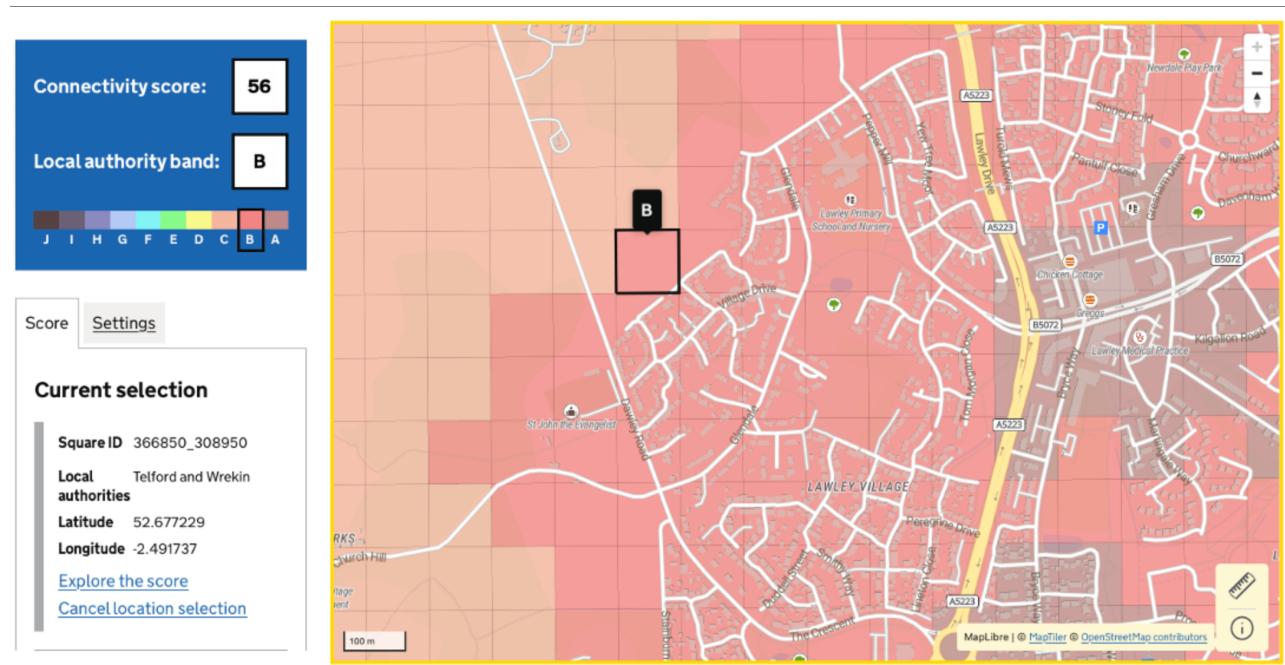


Figure 3: Site extract - DfT's Connectivity tool

Additionally, a more localised review of walking, cycling, and public transport has been undertaken which confirms there is a strong opportunity available to travel to nearby amenities by sustainable means of travel from the site.

The site is well located to an extensive local pedestrian network (footways and shared foot/cycleways) permitting permeable and segregated trips between the site and Telford town centre. Bus stops are located within walking distance to the site on Dawley Road and Glendale servicing the 99A/C and 8/8A services, respectively. These services provide direct access into Telford town centre. Furthermore, the 99A/C service provides direct access to Wellington train station which enables onward journeys to key nearby major destinations in Shrewsbury to the West and Birmingham to the east. A 'Movement Strategy' will inform site layout and design to increase internal permeability and encourage movement to and from the site by sustainable modes.

With regard to access and layout, the site benefits from direct frontage access with Dawley Road, providing more than adequate land to be able to deliver a suitable site access. Access was considered with the LPA during pre-application discussion and it was agreed that a number of elements could be incorporated into the design such as extension of 30mph limit, speed control measures, private driveways along frontage, and improved pedestrian links. The highway safety record indicates that there have been no recorded accidents on the site frontage for the last 5 years - any new access would be fully developed and tested to ensure its safety.

In considering potential impact on highways, the wider and cumulative residual impact of the scheme will be assessed as part of the formal application stage. However, the collaborative approach taken to date with the council has provided a number of points from which to build upon. This includes local capacity concerns at the Cock Hotel junction and as such would be a key focus of any forthcoming application. It is understood the council is undertaking a corridor appraisal along this route which we will work in collaboration with them on. Further measures to reduce highway impact would build upon measures to optimise sustainable transport and design options such as left in left out restricted access to help direct movements away from the junction, to the south instead. Any future scheme would be supported by a Travel Plan. The above all confirms that the site is deliverable in transport and highways terms.

With regard to ecology, a Preliminary Ecological Appraisal (July 2025) by Wardell Armstrong for Parkhill Group has concluded that with further surveys and mitigation recommendations it should be possible for the proposed development to proceed in compliance with wildlife legislation and related planning policy.

On landscape, PDP Associates has undertaken a desktop review of the baseline information identified in CD08. PDP's review concludes that NC02 (T&W Landscape Capacity Assessment, September 2023) confirms that the site has some capacity to accommodate development. PDP's review notes that the site is not located within a Strategic Landscape or the AONB and that the Wrekin Forest Strategic Landscape lies to the west of Dawley Road, adjoining the road corridor. It notes that NC02 confirms that the site does not form part of the visual and landscape setting of the Wrekin Forest Strategic Landscape and Shropshire Hills AONB. From this, PDP confirms it would be reasonable to assume there is no potential for adverse effects on the special qualities of the designated landscapes.

PDP also notes that the site is within a mineral safeguarding area - we can confirm that the minerals have been extracted and any mineral protection is therefore no longer relevant. PDP also confirms the site has been previously altered by changes in farm management, encroaching settlement and other urban development. Generally, the landscape in the immediate locality is more wooded than it would have been historically due to reclamation works and the introduction of a screening belt around the emerging settlement edge and along the highways. This greenery would not be affected by the development, with additional planting also proposed under any future application.

Furthermore, appraisal of Site H08 confirms the land does not form part of the visual setting for Church of Saint John Grade II Listed Building and there is no potential for a significant change in the immediate landscape setting of this building. Through appropriate design and layout, PDP's review concludes development on the site has the potential to satisfy the development guidelines set out in the Telford and Wrekin Landscape Capacity Assessment.

"Is the estimated housing number for each site a reasonable figure based upon the evidence?"

No, we do not believe the housing number proposed for H08 is a reasonable figure based upon the evidence. AS01 (T&W Site Selection Technical Paper, March 2025 - para 3.1) notes that site allocations establish the principle of development of a particular use and/ or type of development, subject to consideration of technical matters through a planning application. This provides flexibility for the exact form of development to be determined through technical matters.

Discussions with the Council's planning and highways officers confirmed that the council's figure of 89 homes was set by the planning policy team, based on their calculation of the lowest yield for the site and that the calculation in its purest form derived 115 dwellings. The lower number was specified as the council considered the site may be constrained in certain places due to Geotech/ highways considerations.

As demonstrated above, Parkhill's further technical work clearly demonstrates that we believe the site can achieve up to c.145 homes. AS01, para 3.3 states that site yields have been applied using Telford and Wrekin's Density and Net Site Area Study (2023) as a starting point. Based on an area of over 2 ha (the site being approx. 5 ha) the net developable area ranges from 50-75%. Regarding site density, for sites in Telford over 4ha, a density of 30-40 dwellings per hectare is suggested. By restricting the site to only 89 homes would limit density to 17.8 dwellings per hectare - a very low density and inefficient use of land. This goes against the crux of national policy which seeks to boost housing growth.

Para 69 of the NPPF requires local authorities to establish a housing requirement figure for their whole area, which shows how their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. It states that "*the requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.*"

EH05, para 1.2 highlights the council's position that circumstances in Telford and Wrekin support the identification of alternatives to the calculation of local housing need using the government's standard method. EH01 also notes that the standard method outcome of 857 dwellings per annum (dpa) falls below the council's intended housing requirement of around 1,000 dpa and that a higher figure aligns more closely with the council's economic growth aspirations, building in flexibility to meet unmet needs from neighbouring authorities. TW11 (Updated Housing Delivery Topic Paper, January 2026) sets out that taking into account existing commitments, windfall allowances, both the existing and proposed allocations, and two strategic sites expected to deliver beyond 2041, the Local Plan has capacity to deliver around 2,025 dwellings more than the identified requirement over and beyond the plan period. This equates to approximately a 9.8 % buffer against the plan requirement and provides a contingency to accommodate any slippage in delivery from other sites or potential lapses of planning permissions.

Whilst the above appears a reasonable buffer, it is known that housing delivery can change quickly. In line with paras 61 and 69 of the NPPF and the Council's objectives to boost housing delivery, it is considered the council should take every opportunity it can to maximise the use of sites and plan for over and above its intended housing requirement.

Housing allocation HO8 would significantly contribute to housing numbers and provides a sustainable location where it can integrate successfully into the built-up area and link with Lawley village and the new residential development permitted to the immediate east (application ref: TWC/2025/0022).

In conclusion, whilst the evidence identifies no hard constraints on site and that the site is suitable, available and achievable, the proposed housing number for HO8 is not reasonable as it has not been based on appropriate evidence. The exact numbers will ultimately need to be determined through a future planning application but initial design work by Parkhill, informed by technical considerations, demonstrates the site could support up to c.145 homes, providing a more efficient use of the site. The number of homes specified at Appendix 15 of CD08 should therefore state "*up to approx. 145 homes*" instead of "*89 homes*."

Total words: 3,000