

Telford & Wrekin Local Plan 2022-2040

Examination Matters Statement

Matter 5 - Allocations

Richborough

Professional memberships and accreditations



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1. Introduction

- 1.1. These representations are prepared by Fisher German on behalf of our client Richborough, in respect of their land interests west of Wellington Road, Horsehay, Telford. This land, as identified on Figure 1 below, is a proposed allocation for circa 70 dwellings in the Regulation 19 document (Local Plan Policy HO1 – Site Reference HO12). The identification of the site as a residential allocation is fully supported.

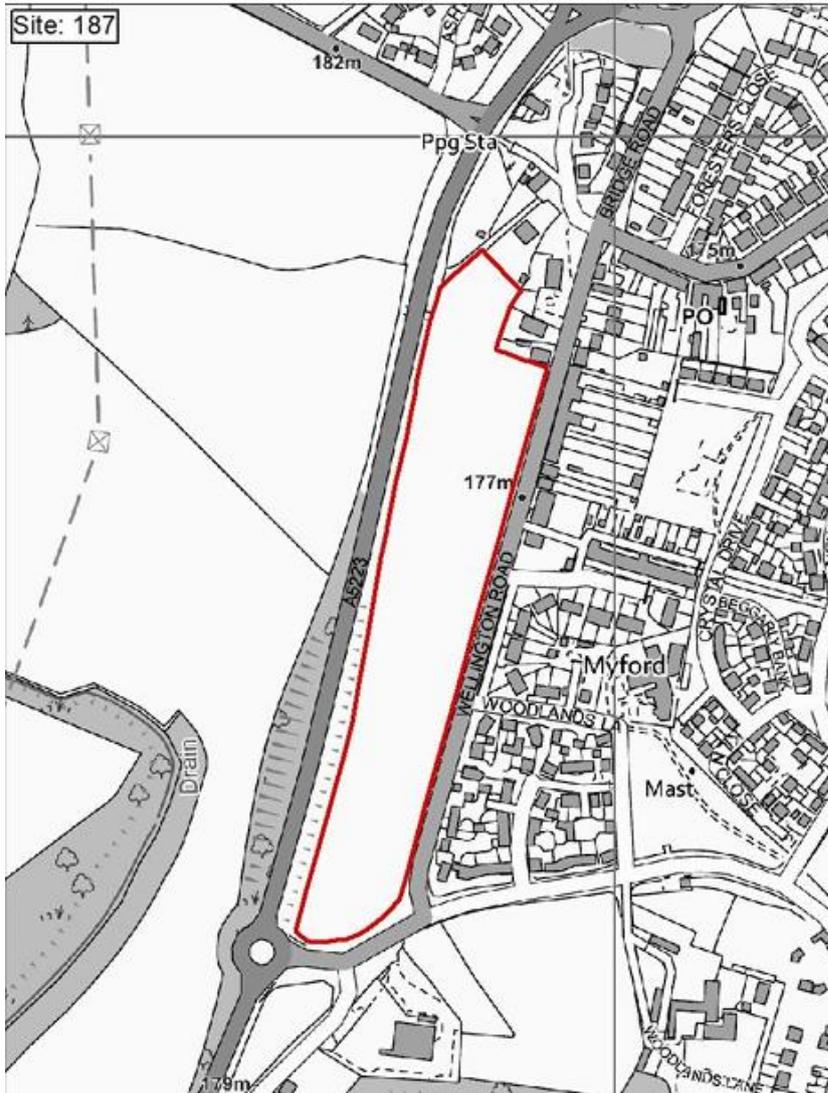


Figure 1: Site Boundary of residential allocation – West of Wellington Road, Telford.

- 1.2. Richborough submitted an outline planning application for 80 dwellings on the 17 December 2025 (App ref: TWC/2026/0005), and it was validated on the 7 January 2026. Updates can be provided if useful at the examination hearing sessions.
- 1.3. The responses to this question focus solely on Richborough’s interests at Wellington Road, Horsehay (H012).

2. Representations

Issue 1: Allocations

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. Yes, in respect of proposed site allocation at Wellington Road, Horsehay, Telford (Local Plan Policy HO1 – Site Reference HO12). Chapter 4 sets out the development strategy, which confirms at paragraph 4.3 that *“the majority of future growth will be delivered in or on the edge of Telford through sustainable extensions to the existing urban area”*. Telford accounts for 76% of the population and is demonstrably the most sustainable location for growth. As such, our client’s land interests at Wellington Road, which are effectively enclosed by existing development on three sides forming part of the contiguous urban area of Telford as an extension to the sustainable suburb of Horsehay, are in accordance with the published preferred pattern of development.
- 2.2. The Council’s site assessment accurately describes the site and its context, demonstrating that the site is deliverable without unacceptable adverse effect. This conclusion has been validated by detailed site specific evidence associated with the pending planning application on the site (App ref: TWC/2026/0005), which again clearly demonstrates no unacceptable adverse effect through the site’s development. This includes a suite of detailed technical documents covering:
- Heritage Statement
 - Phase 1 Geo-environmental Assessment
 - Ground Investigation Report
 - Coal Mining Risk Assessment
 - Minerals Assessment
 - Flood Risk Assessment
 - Sustainable Drainage Statement
 - Noise Impact Assessment
 - Air Quality Assessment
 - Transport Assessment
 - Travel Plan
 - Landscape and Visual Assessment
 - Green Space Factor Calculations
 - Landscape Strategy
 - Ecological Impact Assessment
 - BNG Metric
 - Preliminary Arboricultural Impact Assessment
 - Utilities Assessment

- 2.3. The evidence has informed the indicative design of the scheme and any required mitigation measures but fundamentally signals that the site is deliverable without unacceptable adverse effects, with a range of benefits to be provided by the development.
- 2.4. Whilst at the time of writing there is limited feedback from statutory consultees, an update could be provided to the examination if available during the site-specific hearing session.
- 2.5. Turning to site capacity, whilst the draft allocation is for an estimated 70 dwellings, having regard for the detailed work associated with the planning application, an application for up to 80 dwellings has been submitted. Whilst the Plan could be updated to reflect this updated position, given the application is not yet determined and Policy HO1 is clear that the site capacity of each allocation is 'indicative', we do not specifically request an update to the housing figure but would welcome an update should the Inspector deem it necessary.

Q44 - Are the requirements within Policy HO1 justified, sufficiently clear and unambiguous?

- 2.6. Part 2 of Policy HO1 sets out 9 criteria for which major housing developments should seek to meet. These have been provided in lieu of the provision of site-specific policies, discussed in relation to question 45 below. We provide our comments in turn to each of the proposed requirements. Commentary in relation to the approach in respect of site requirements is provided in relation to question 45.

A) An indicative layout for the entire site with clearly labelled quantum of development, site densities, phasing and uses proposed

- 2.7. Criterion A requires an indicative layout for the site. The use of the term indicative suggests this requirement relates to an outline application, as a full application is required to demonstrate layout which would require a detailed masterplan. It is in our opinion rare that major development would be sought without an indicative framework showing developable areas, green infrastructure etc and presented on a development framework plan or illustrative masterplan; and whilst at outline any design would only be indicative regardless, it is considered a reasonable request of development so residents, officers and Councillors have a reasonable understanding of how development may look.
- 2.8. Site specific constraints may require specific layout solutions such as the location of public open space or landscaping for example and illustrative layouts/Development Framework Plan or parameter plans can be conditioned on approval, particularly in such circumstances where there is a need to control the location of development.
- 2.9. Richborough accept an indicative plan showing the layout of the different proposed areas on a site is an acceptable requirement of major allocated development, but the policy or reasoned justification should make clear that for outline planning stage there is no need to require plot level masterplans, and development framework plans or similar is appropriate and commensurate for that stage of determination.

B) A Design Brief to support a development of this size

- 2.10. The term design brief is not clarified within the document. It is unclear how a Design Brief differs from a Design and Access Statement, or whether a Design Brief could be included in a Design and Access Statement. To comply with NPPF Paragraph 16d policies within Plans should "*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*". Given the term Design Brief is unambiguous, concern is raised that without clarification this requirement fails 16d of the Framework. For clarity, the term Design Brief should be clearly set out in the Reasoned Justification text.
- 2.11. Furthermore, concern is raised that Design Briefs may largely mirror the role of a Design and Access Statement which itself is a National Validation requirement for major applications. As such, without clarity on what a Design Brief is, what it is expected to achieve and how it differs from a Design and Access Statement which would otherwise be required, or other industry mechanisms such as Design Codes. As such, we also raise concern that this criterion may fail 16f of the Framework which requires Plans (and

logically their policies) to “serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)”.

- 2.12. Design Briefs may be more relevant for larger, multi-phase schemes, as such the policy should be clear as to the threshold wherein they are required. However, without clarity on what the Council means by a Design Brief it is impossible to provide more detailed comment.

C) Measures of how flood risk and surface water will be addressed;

- 2.13. Whilst this is duplication of national policy (NPPF 16f) which sets out when Flood Risk Assessments are required as part of development at footnote 63, Richborough have no objection to its inclusion for the benefit of residents or other interested parties who may not know that any application for a major residential site will need to consider flooding, as this is generally raised as a concern of new developments.

D) A Transport Assessment to assess the impacts on the associated highway network and a Travel Plan to promote sustainable travel;

- 2.14. Again, as per criterion C this is already a requirement derived from the Framework (Paragraph 118), however given local concern we see no material harm in its inclusion despite the provisions of NPPF Paragraph 16f.

E) Measures of how the development will mitigate and adapt to climate change including energy efficiency and renewable/ low carbon energy production;

- 2.15. New development is already significantly controlled in respect of building regulations, and any requirement for development to require standards above building regulations should be specifically justified locally through evidence. There are however wider measures through site layout and active travel for example which could be said to contribute to these matters. Whilst we do not object to the aims of this policy, our view is it requires clarification as to what is required from applicants to satisfy this criterion.

F) Details of the land conditions and site levels information

- 2.16. This is potentially onerous and depends on the nature of the site. Clearly on sites with difficult topography or with flooding issues, site levels become highly relevant. However, on flat, greenfield sites with no adverse history, this detail becomes less relevant. Given presumably the applicant can justify how it complies with this policy, so long as it enforced in a commensurate way, we have no objection. This could include commentary in the planning statement for example.

G) Key principles and structure for meeting biodiversity net gain, greening requirements and open space strategy;

- 2.17. Biodiversity Net Gain is covered in legislation, though again for clarity we see no harm in referencing here for the benefit of residents. Greening requirements are covered by another policy in this Plan (comments below) but again subject to that policy being found sound then no objection to the repetition despite the requirements of NPPF Paragraph 16f. No objection for major development to have a coherent approach to open space as a benefit of new development.

H) A comprehensive strategy for the phasing of the site and key infrastructure to support a sustainable community;

- 2.18. Site phasing again will not be relevant for all developments. As such, we consider the words where relevant should be added following “the phasing of the site”. A smaller development (such as our clients interests) generally is built in one single phase of development by a single builder, and requirements linking to phasing are not usually relevant and serve to delay matters. Again, a threshold could be included for developments over 300 dwellings, as these are more likely to be delivered by multiple outlets or in a phased approach. Turning to key infrastructure, this is not usually known at the point of submission and with regards to timings is considered at the S106 discussions. As such it is difficult to satisfy this criterion at submission, but the relationship between the delivery of infrastructure and housing is a key area of

concern of residents so the rationale for inclusion is understood. It may be an indicative infrastructure strategy can be submitted with heads of terms at submission, but pending further consideration and the comment of statutory consultees and third parties. Again, this policy may require slight amendment to make the process clear to the applicant of what is anticipated at which stage.

l) Demonstration of how the entire site will comply with all relevant planning policy in the Local Plan.

2.19. This is the job of a planning statement which is usually submitted in support of major development and as such we have no objection to such a requirement. We would request the following change so the policy is compliant with the requirements of Section 38 of the Planning and Compulsory Purchase Act 2004.

Demonstration of how the entire site will comply with all relevant planning policy in the Local Plan, or where the application is in conflict with the Development Plan, the material circumstances which support deviation.

Q45 - Do any of the proposed site allocations in Appendix 15 have specific requirements which should be set out in the Plan?

2.20. Currently no. Richborough do not object to the exclusion of specific requirements, however if they are to be introduced through this examination parties require fair and reasonable opportunity to comment. Ideally, the intention to deliver such policies should be agreed early if considered necessary, to give the Council opportunity to draft wording and allow for discussion at the site specific sessions.

2.21. Whilst site specific policies are common, we are not aware of any definitive requirement for them and the Council has overarching policies contained within Policy HO1 which cover a wide range of matters applicable to all sites. Site specific policies are usually required to address specific concerns relating to sites and their delivery, or to ensure specific benefits from development can be achieved. Given the Council has not considered it necessary to include such provisions, we are not aware of any need for them. There are no site-specific policies that are considered necessary to ensure the appropriate delivery of Wellington Road, Horsehay (H012).