

Telford & Wrekin Council – Responses to Matters, Issues and Questions

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Matter 5, Issue 2

Issue 2: Whether each of the Sustainable Communities allocations in Policy HO2 and their policy requirements are soundly based?

Q47. 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?

Yes, the National Planning Policy Framework (NPPF) is clear that Local Planning Authorities (LPAs) should consider planning for strategic development sites (or broad areas of growth) as part of the plan making process. Paragraph 77 of the NPPF further states that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided that they are well located, designed and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes).

Policy HO2 establishes the framework for the development of three new Sustainable Communities within the Local Plan, aimed at addressing the housing, employment, and infrastructure needs.

Following the Council's call for sites, a total of five Broad Areas of Growth (BAG) were identified adjacent to the boundary of the Telford urban area and assessments of all five sites took place. It was determined that three of the areas were to be taken forward as part of developing the Draft Local Plan.

The Council has continuously worked in partnership with the three Sustainable Community consortiums to coordinate the approach to bringing proposed allocations forward, resolve issues that may arise and identify infrastructure requirements. Further detail regarding each of the Sustainable Community sites is set out within the topic papers TW06, TW07 and TW08.

Supporting evidence documents that have helped shape the approach to the Sustainable Communities sites and policy development include the following documents:

- Site Selection Technical Paper (AS01) – the paper provides an overview of the site selection process, including when the broad areas of growth were identified and reasons for sites being discounted.

- Integrated Appraisal (CD04 and CD06) – these documents provide a high-level appraisal of the Sustainable Communities sites.
- Transport Analysis (SWOT) (IS08) – This document explored a high-level analysis of the transport and highways strengthens, weakness, opportunities and threats for each of the possible Broad Areas of Growth which assisted in the decision-making process when having to discount sites.
- Landscape evidence documents (NC02, NC03, NC04 and NC06) – these documents provide an appraisal of landscapes to ensure that site allocations are strategically located, environmentally sensitive and take account of visually sensitivity in the borough, balancing housing needs with both environmental protection and visual quality. This work was helpful when making decisions on the Broad Areas of Growth as it provided the evidence for not progressing a site which was near to a National Landscape and had a significant proportion within the Wrekin Strategic Landscape.
- Strategic Flood Risk Assessment Level 1 and 2 (WF01 and WF02) – the SFRA provides site specific guidance for the Sustainable Communities sites that will help shape detailed planning applications.
- Telford Growth Strategy Refresh – this document provides an overview of the highways and transport networks in Telford and Wrekin and how they relate to the Sustainable Communities sites.
- Infrastructure Delivery Plan – provides a broad plan which identifies strategic off-site infrastructure including projects related to the Sustainable Communities sites such as new primary and secondary facilities and improvements to the highway network.
- Telford Local Plan 2040, Traffic Modelling Report – the document provides a summary of the strategic traffic modelling undertaken that has helped inform the projects identified in the Infrastructure Delivery Plan.

All three SC's accord with the development strategy, contributing to Telford's role as the major service centre for the borough and its role in providing jobs as well as further and higher education opportunities. Telford has good infrastructure networks including highways and utilities that can support additional growth.

As stated within paragraph 4.5 within the emerging Local Plan, the need to accommodate growth beyond the existing boundary of Telford is critical to protecting the town existing green spaces including LNR's, Green Guarantee sites and green network from development pressures. It also recognises that as the town has matured there are fewer opportunities for large scale brownfield development that can help meet the boroughs development needs within the current urban boundaries. Some suggested modifications have been suggested in order to make certain that the SC policies accord fully with the development strategy for the borough as set out in document CD08.

Q48. 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?

Yes, the Council considers that the evidence supports the expected delivery trajectory for each of the Sustainable Communities (SC) allocations, and that the evidence base has had regard to the implications of all three SCs coming forward within broadly similar timescales in the northern part of the Borough.

The Council's position is set out in the Updated Housing Delivery Topic Paper TW11 (January 2026) and accompanying appendices, which incorporates the latest housing monitoring data (including up to date planning applications data to December 2025) and includes an updated housing trajectory and a detailed schedule of anticipated delivery by plan year for each allocation, including the SC sites.

The Update Housing Delivery Topic Paper explains that lead-in and build-out assumptions have been informed by local monitoring evidence (AMRs and Five Year Housing Land Supply) and benchmarked against national research (including Lichfields' Start to Finish (2024)). It also records strong recent delivery performance, including Housing Delivery Test results of 226% (2020), 233% (2021), 264% (2022) and 327% (2023).

In addition, the SC Topic Papers provide site-specific evidence consistent with Planning Practice Guidance on deliverability (PPG Reference ID: 68-007-20190722), including current planning status, firm progress towards submission of applications and information on infrastructure coordination. In summary:

- SC1 is being brought forward by Bloor Homes and David Wilson Homes, with stated intended submissions in early 2026 and delivery phased from 2027/28 (TW06);
- SC2 is being coordinated by a consortium, with stated intended outline applications in 2026 and delivery phased from 2029/30, with “*at least 6 outlets*” once underway (TW07); and
- SC3 is being coordinated by a consortium including Homes England, with EIA scoping planned in Q1 2026 and an outline application expected by Q3 2026, and delivery assumptions based on “*at least four outlets*” once underway (TW08).

The Council also considers that the evidence base takes account of the interaction between the SCs delivering within the same broad geography and timeframe. The SC trajectories are phased and do not assume all three sites commence simultaneously (TW06, TW07 and TW08). The Topic Papers also identify mechanisms for coordinated delivery, including Design Briefs and a framework agreement approach for securing key infrastructure with trigger points and

thresholds, and cross-site education arrangements (with SC3 providing secondary school land and an equalisation approach for contributions from SC1 and SC2) (TW06–TW08).

On this basis, the Council considers that the expected SC delivery trajectories are supported by the borough-wide trajectory methodology and the site-specific evidence of planning progress, phasing, delivery structures and infrastructure coordination.

The Council has a strong record of delivery with strategic sites coming forward at Lawley (c.3,500 homes) and Lightmoor / Doseley (c.1,500 homes) being developed out over a similar period to the southwest of Telford.

Q49. Do any of the proposed requirements of Policy HO2 for each site conflict with or duplicate the other policy requirements of the Plan?

No, the policy requirements for each of the Sustainable Communities have been structured to allow for an efficient and comprehensive delivery of each site. Details within the delivery section of each policy have been included as they are specifically relevant to that site. A number of modifications have been suggested that help clarify the application of each SC policy.

Q50. 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?

As stated in paragraph 9.11, the Council has been engaging constructively and on an on-going basis with each of the development consortiums for the SC sites to coordinate an approach to successfully bring forward comprehensive and sustainable schemes as well as identifying infrastructure requirements. In addition to topic papers produced for each SC site the Council are in the process of agreeing Statements of Common Ground that will help aid the delivery of requirements set out in policy.

The Council are requiring each of the SC's to agree a Design Brief with the Council in order to ensure SC sites come forward in a coordinated manner and deliver in required infrastructure across helping to ensure policy compliance. In addition to this the Council will be requiring a framework agreement with each SC to secure the delivery of site wide infrastructure. Both the Design Brief and the framework agreement will need to be agreed in order to inform the determination of the first application and subsequent detailed applications.

The SC's have also all agreed, subject to agreeing acceptable terms, that a Planning Performance Agreement signed between the Council and SC will be an acceptable requirement to ensure delivery targets are met.

Suggested modifications have been proposed (CD08) following responses at Regulation 19 which amend the wording to read cohesively with additional requirements to align with policies S6 and S7. In addition, phasing plans should now

be considered prior to submission as part of the Design Brief process, this allows the Council to manage risk, cost and complexity for each of the sites.

The measures set out in the Local Plan and the proposed modifications will help streamline the planning process, provide clarity and ensure that development can be delivered to the agreed trajectory.

Q51. 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?

As this question is the first to consider viability some wider context is provided. The *Whole Plan Viability Assessment* (HDH Planning, June 2023) (VS01) includes a comprehensive assessment of viability. The 2023 WPVA was prepared by HDH, a firm of Chartered Surveyors specialising in such work. The relevant RICS guidance requires such work to be undertaken objectively and transparently.

The WPVA was prepared in line with the requirements of the NPPF and the PPG (Chapter 10) and follows the Harman Guidance and conforms with the RICS Guidance (HDH is regulated by the RICS). The preparation of the WPVA included a period of technical consultation with the development industry, which was carried in February 2023.

The LPVA is based on the Existing Use Value (EUV) Plus approach required under the PPG. It is based on modelling a set of 23 typologies (see Table 9.2). These typologies are representative of the type of development that is anticipated to come forward in the Council area over the plan-period. These range from large scale greenfield sites to small flatted schemes. In addition, 5 potential strategic sites were modelled (North of A442 Wheat Leasows, North East of Muxton, Bratton and Shawbirch, North of Redhill, and Dawley Rd) (see Table 9.2). A range on non-residential uses were also modelled.

The values of market housing (including specialist older people's housing and student housing) were researched, based on published data sources, price paid data from the Land Registry and asking prices of newbuild and existing homes. The values of affordable housing were also derived. The values of non-residential uses were also researched, as were land values. The land value research was informed by the prices paid (from the Land Registry) for recently approved schemes.

The details of the residential research is set out in Chapter 4 of the WPVA, the details of the non-residential research is set out in Chapter 5 of the WPVA and the details of the land value research is set out in Chapter 6 of the WPVA.

The costs of development were estimated, as per the PPG. The costs of construction were based on the BCIS costs, and allowances made for site costs, abnormal costs, contingencies, fees, finance costs etc. An allowance was also made for developer's return (i.e. profit) which is treated as a cost in the appraisals.

The purpose of the WPVA was to consider and inform the development of the Local Plan and, to assess the cumulative impact of the policies on the planned

development. The costs of the policies in the emerging plan were considered in in Chapter 8 of the WPVA.

An important aspect of the assessment was to consider development's ability to bear the costs of strategic infrastructure and mitigation. An allowance for developer contributions was made. As the IDP was being prepared and yet to be completed. Sensitivity testing of up to £40,000/unit was undertaken.

Sets of appraisals were run, and through an iterative process the policy requirements were developed. As set out in Chapter 10 of the WPVA, this was caveated as on this basis, not all development is viable. The WPVA noted that the Council should be cautious in assuming flatted development or Build to Rent development would come forward, as these are not likely to be delivered.

In summary, the 2023 WPVA has been prepared in line with the requirements of the NPPF and PPG. Its preparation included informal technical consultation and then was subject to formal consultation through the Regulation 18 process. The Council policies in the WPVA were informed by the viability process.

In December 2024, HDH produced the *Regulation 19 Viability Note – December 2024 (VS02)*. The December 2024 note considers how the changes in costs and values, changes in national policy and refinements in the emerging Local Plan may impact on viability, and whether it was necessary for the Council to fully update the viability evidence before submitting the Local Plan for examination.

Sections 10.55 to 10.57 of the 2023 WPVA considered the impact of changes in costs and values on the preferred set of policies, based on further appraisals that were summarised in Appendix 19 of the 2023 report. This analysis was repeated based on the following changes:

- a. The values are increased by 10% and the construction costs rebased to the latest BCIS costs.
- b. Biodiversity Net Gain is assumed at 20%, based on a cost of 150% of implementing 10% BNG.
- c. The Cost of FHS Option 1 has been updated to plus 6% for housing and plus 4% for flatted development.
- d. The Wheelchair Accessible M4(3)a has been updated to 3.5% of market housing and 5% of affordable housing. The balance of the housing is assumed to be Accessible and Adaptable (M4(2)).
- e. The affordable housing mix has been updated to reflect the Council's preference is for all Affordable Home Ownership housing to be delivered as Shared Ownership rather than First Homes and for half of the affordable housing for rent to be Social Rent. (Telford and Adjacent – 25% affordable as 40%, Social Rent, 40% Affordable Rent, 20% Shared Ownership, Newport and Rural - 35% affordable as 40%, Social Rent, 40% Affordable Rent, 20% Shared Ownership).

The sensitivity testing is based on the full policy-on scenario of 25% affordable homes in (and adjacent to the Telford built-up area; and 35% affordable homes in Newport and the rural area. Sensitivity testing is carried out on varied amounts of affordable housing and with 10% Social rent rather than 40% Social Rent.

The results confirm that the 35% affordable housing policy is appropriate in Newport and the rural areas. Based on the viability evidence, it is recommended that the Council adopts the 20% affordable housing requirement in and adjacent to Telford, as recommended in the 2023 WPVA.

The results in relation to the Sustainable Communities are similar to those reported in the 2023 WPVA. On these, the Residual Value exceeds the EUV, but on most it is a little less than the BLV, suggesting that these are likely to be challenging to deliver with 20% affordable housing. The delivery of any large site is challenging.

Regardless of these results, it was recommended that the Council engages with the owners in line with the advice set out in the Harman Guidance.

The Council has followed this advice and is in the process of preparing statements of common ground with the promoters of the Sustainable Urban Extensions.

The 2024 Viability Note also went on to highlight that a key characteristic of the Council area, and particularly within Telford, has been the extent of public sector ownership, and the Council's success in securing external funding to facilitate the delivery of housing schemes, and (alongside RP partners) to ensure the delivery of affordable housing. Over the last 7 years, about 60% of affordable housing has been delivered with some form of Homes England and or Council input (non-S106 affordable housing), and 40% through market led housing schemes (S106 affordable housing). As set out above, the Council believes that the affordable housing requirements in the Draft Plan are appropriate as around 60% of the Council's affordable housing delivery is achieved through Homes England grant funding, rather than through S106 agreements. In addition to this, the Local Plan supports the delivery of 100% affordable housing schemes, which the Council actively seeks to secure through working with local registered providers.

It will still be necessary for the Council to be cautious in assuming brownfield development generally and greenfield development in and around Telford would come forward, as these are not likely to be delivered at the proposed levels of S106 affordable housing, without some form of public sector intervention. There are some brownfield sites, that may come forward for development, which are within the Council's control. The Council has a good record of securing 'gap funding' to enable the delivery of large-scale greenfield schemes and anticipates that this will continue in the future.

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?

(a) - Yes, the Council considers the employment land requirement within each Sustainable Community (SC) is justified as it forms part of the Plan's overall employment land strategy and supply.

Policy HO2 sets out the employment land quantum to be delivered within each SC, namely: SC1 2ha (E Use Class); SC2 5.6ha; and SC3 68ha (including 22ha of existing employment allocation E28 at Shawbirch). The Updated Employment Land

Delivery Topic Paper (TW03) confirms that the SCs form a defined component of the Plan-led employment land supply, contributing 75.6ha in total.

The Council further considers this approach is justified because Policy HO2 defines the SCs as strategic mixed-use allocations intended to deliver homes, supporting infrastructure and employment opportunities together, helping to create more sustainable patterns of development and reducing the need to travel.

(b) - The Council also considers the policy provides sufficient clarity on quantum and an appropriate balance of clarity and flexibility on location and type. Policy HO2 clearly specifies the quantum of employment land for each SC, including: SC1 2ha of employment land (E Use Class); SC2 5.6ha of employment land; and SC3 approximately 68ha of employment land (gross) which includes 22ha of an existing employment allocation, E28.

The policy does not fix detailed boundaries, instead it states that a development brief will be required to coordinate uses across the site and that the brief shall be agreed with the Local Planning Authority prior to consideration of any detailed matters. This provides an appropriate mechanism for the detailed location and configuration of employment land to be finalised through master planning and planning applications, whilst retaining flexibility at the strategic policy stage.

The Council considers this is an effective approach given the scale of the SCs and the need for employment land provision to respond to market demand whilst still meeting the minimum quantum set out in policy. This approach also allows the detailed form, distribution and phasing of employment land within each SC to respond to evolving market requirements over the plan period, whilst ensuring that the overall quantum of employment land required by Policy HO2 is delivered.

Q53. 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?

The cumulative impact of growth across Telford and Wrekin has been assessed in the Cumulative Impact Assessment located in Chapter 7 of the Level 1 SFRA (WF01). The individual flood risk to the sites and recommendation for mitigation measures have been set out for the SC sites in the Site Summary sheets included with the Level 2 SFRA (WF02).

The 2025 NaFRA2 brought with it updated flood zones, the impact of this new data on site assessments can be found in documents WF03, 3a and 3b. The relevant site references for the SC's are as follows:

- Land North of A442 Wheat Leasows (126)
- Land North East of Muxton (237)
- Land at Bratton (408)

The cumulative impacts of the SC sites on highway provision has been evidenced through the Telford and Wrekin Traffic Modelling Report (IS04) and the Infrastructure

Delivery Plan (IS01). The Council are preparing a strategy for the apportionment of costs between the three SC sites that will help inform future framework agreements for securing infrastructure as part of the development management process.

The cumulative impacts of the SC sites in education provision has been evidenced through the IDP document (IS01), which has been prepared following engagement with the Local Education Authority. This sets out the required number and size (by form) for primary provision and identifies the need for a new secondary school. The secondary school will be centrally located on allocation SC3 and the three developer consortiums are preparing an agreed approach on the apportionment of contributions towards the school for agreement with the Council.

Q54. How will delivery of additional infrastructure be coordinated between the three SCs, and between developers and relevant agencies, and how will this be secured? Does this need to be explained in the Plan?

On-site infrastructure will be co-ordinated through a Design Brief document for each of the Sustainable Community (SC) sites. A framework agreement will then capture the off-site infrastructure requirements for each site which will outline key trigger points and thresholds for delivery of key infrastructure such as highways as well as on-site infrastructure such as schools and local centres. In the case of highway schemes, direct delivery via Section 278 agreements will also be supported.

To support this, the Council are preparing a contributions strategy for highways schemes identified within the Infrastructure Delivery Plan to ensure fair distribution of costs and efficient delivery through both s.106 contributions and 278 agreements. With regard to education, the SC's are in the process of agreeing a mechanism for the equalisation of costs across the three sites. This is important to ensure fair apportionment of costs, especially in the case of secondary school provision.

The Council would support inclusion of the mechanisms as stated above into policy HO2.

Q55. Does the policy need to specify the size of new schools required in the SCs to be effective? Is there sufficient flexibility if evidence on school place planning changes over the Plan period?

The policy specifies the size of primary school schools required by the number of required forms of entry. The number of forms dictate the number of schools places provided. The Council consider this information to be sufficient for the policy to be effective. It does however consider that a further modification could be made to specify the number of forms for the Secondary school that will be required. The size of the schools has helped inform the land requirements which are critical to future proofing education provision for the SC sites.

The IDP will be regularly updated to reflect developments that are coming forward and any significant changes in the planning for school places. The Council will

also seek early engagement with developers to understand the likely composition of developments in terms of household types. For the SC's they will need to deliver education infrastructure to an agreed phasing plan in agreement with the LPA and Local Education Authority in line with projected housing delivery rates.

Q56. (a) Is there clear and convincing evidence of the highways and sustainable transport infrastructure that is needed for successful delivery of each SC, including mitigation of traffic impacts on local roads and existing communities? (b) Does necessary transport infrastructure and its expected phasing need to be set out in the Plan for the policy on SCs to be effective?

(a) - The Council's methodology for site selection can be found within the Site Selection Paper (AS01) and a review of the impact of allocated sites can be found within the Integrated Impact Assessment Report (IIA) (CD06). The Council considers this approach to selecting individual sites to be logical, proportionate and based on sound planning judgments. Based off the evidence found within the previously stated documents, as well as the Infrastructure Delivery Plan (IS01), the Council finds that there is sufficient evidence for the impact of the proposed SC's and the infrastructure required to accompany them.

With regard to traffic mitigation, the Traffic Modelling Report (IS04) provides comprehensive analysis of the projected traffic generated by the three SC sites and identifies projects that will help mitigate the traffic impacts of these. The IIA also suggests that the facilities provided by the SC's would help reduce the need to travel once completed.

(b) - No, it is not necessary to include details of highways and transport schemes and its expected phasing for the policy to be effective. The detail of infrastructure phasing is best addressed within the Design Brief, Master plans and framework agreements for each SC and agreed to help inform the determination of the first planning application and any subsequent detailed applications.

Q57. (a) How will vehicles access SC2 and what effect will this have on existing residents and businesses? (b) What alternatives were considered and why were they ruled out? (c) How will any harmful impacts be mitigated?

(a) - A number of access points are proposed across the site (SC2), with primary access points provided alongside, secondary access points onto the existing road network including the A518. Traffic modelling using the Telford Strategic Transport Model (TSTM), has been undertaken to assess the impact of development on the borough's road network.

The traffic modelling has identified junctions and links that may become constrained in the future, as a result of proposed growth. To address these potential constraints, TWC have identified a number of highway schemes, which are detailed in the Infrastructure Delivery Plan (IS01). Delivering these highway schemes will be

important in ensuring that TWC's highway network remains efficient, and capable of supporting future growth and development. The highway schemes target both links and junctions and include:

- Improving junction capacity by providing additional approach lanes and extending flare lanes; and
- Re-designing existing junctions and roundabouts to improve traffic flow and reduce congestion.

(b) - Following feedback at Regulation 18, the Council informed the consortium representing SC2 that access points onto Wellington Road would not be acceptable due to the adverse impacts that this would have on residents and heritage in the area. Access points off Wellington Road have since been removed following as detailed in AS01 Site Selection Technical Paper and in agreement with the consortium representing the site (SC2).

Other alternative options were not considered by the consortium representing SC2 as alternatives were likely to consider quieter residential roads which would cause greater impacts.

(c) - The Council have identified key highways projects which will be required to ensure that the highways network can continue to work effectively and mitigate the impacts of future development proposed. The identified schemes are set out within Table 14 of the Infrastructure Delivery Plan (IDP) (IS01). Funding for these projects will be sought in a number of ways including Section 106 and Section 278 agreements.

Q58. Does the policy need to require development in SC3 to contribute to projects for the enhancement of heritage assets with tourism potential (such as the Shrewsbury & Newport Canals and Wappenshall Wharf) for the Plan to be effective?

Yes, a modification has been suggested within CD08. In the vision for the site, the Council have suggested that there is potential for tourism activity related to the restoration of the Shrewsbury and Newport Canal at Wappenshall Wharf, the alignment of which is recognised under Policy CI4. Regarding whether the policy needs to require development to contribute to projects for the restoration of the canal and associated heritage assets, the Councils response is covered under Q135.