

TELFORD AND WREKIN LOCAL PLAN EXAMINATION

MATTER 5, ISSUE 2: WHETHER EACH OF THE SUSTAINABLE COMMUNITIES ALLOCATIONS IN POLICY HO2 AND THEIR POLICY REQUIREMENTS ARE SOUNDLY BASED

INTRODUCTION

This Hearing Statement has been prepared by Montagu Evans LLP on behalf of the Consortium of promoters of the Land North East of Muxton Sustainable Community (“the Muxton SC” / “SC2”) in response to Matter 5, Issue 2 of the Inspectors Schedule of Matters, Issues and Questions (“MIQs”) (ID04).

The promoters which comprise the Consortium are:

- The Defence Infrastructure Organisation
- Gladman Developments Ltd
- Davidsons Developments Ltd
- Telford & Wrekin Council
- Mr P Ward
- Shropshire Homes Limited
- Bloor Homes Ltd

The Consortium support the allocation of the Muxton SC and are committed to working together with the Council to bring forward the SC to meet the identified housing and employment needs of the District.

The following sections answer the relevant MIQs in response to Matter 5, Issue 2 and whether each of the sustainable communities allocations in Policy HO2 and their policy requirements are soundly based.

At this stage of Local Plan preparation, the purpose of the Examination is to consider the soundness and legal compliance of the draft Local Plan. Paragraph 36 of the National Planning Policy Framework ('NPPF') requires that any Plan submitted to the Secretary of State for Examination must be capable of being found both legally compliant and sound. This includes ensuring the Plan is:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

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?

It is the Consortium's view that the Muxton SC and its policy requirements are justified, deliverable/developable, consistent with national policy and supported by the evidence, whilst also according with the development strategy for the Plan.

It is important to note that the Consortium have been working closely with the Council throughout the Local Plan process and submitted Representations at both Regulation 18 and Regulation 19 stages which supported the inclusion of the Muxton SC in the Plan. Alongside this, other engagement has taken place to inform the SC allocation, including discussions over the masterplan and the submission of technical information.

The Council have prepared their own comprehensive evidence base and a significant amount of due diligence and technical work underpins the allocation of SC2 by all parties involved. The evidence base documents relate to climate change, green and natural environment; economy and housing, infrastructure, waste and minerals, water and flood risk, viability studies and also site allocation specific documents. Specific documents will be cross referred to in answering Q48 – Q57.

In terms of the delivery strategy, the Muxton SC fully accords with this and will make a significant contribution towards to the Council's housing need (planning for 20,680 homes over the plan period) and its economic delivery strategy (planning for the delivery of a minimum of 169ha of employment land over the plan period). If the Council is to deliver this, the prompt commencement of delivery of the Muxton SC is fundamental to success, alongside the other SCs. The Consortium fully supports the spatial strategy and the robust site selection process. The three SCs have clearly been demonstrated to be the most suitable and deliverable options.

We do not seek to repeat our Representations as per the Regulation 18 and 19 consultations but emphasise that the Consortium fully supports the allocation of the Muxton SC and is committed to working with the Council to enable successful delivery.

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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?

Policy HO2 identifies that SC2 will deliver a minimum of 2,700 dwellings with 2,305 of those to be delivered in the plan period.

A Topic Paper has been agreed between the Consortium and the Council and appended to this is a Capacity Study and a Housing Trajectory. These documents cumulatively support the delivery trajectory of the SC, with the housing trajectory confirming that 2,600 homes can be delivered within the plan-period to 2041, with the remaining 250 homes to be delivered after the end of the plan-period.

Therefore, the evidence supports the expected delivery trajectory for SC2.

The Consortium has been aware throughout the preparation of the Local Plan that three SCs will be seeking to deliver housing at a similar time in a similar part of Telford and the market. More recently, Topic Papers have also been prepared for SC1 and SC3 and these contain details of housing delivery / build-out rates. Delivery strategies take into account SC1 and SC3 and the Consortium are comfortable. This has included detailed discussions between the promoters that comprise to the Consortium to ensure that this is the case.

As the largest settlement in the local authority area with a high housing need, it makes absolute sense for development to be focused here and this is the most sustainable approach to doing so.

Word count: [220]

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

Policy HO2 does not conflict with or duplicate other policy requirements of the plan. The policy provides a clear expectation as to what is to be provided within the scheme, with future detailed assessment to be undertaken via the detailed development management policies of the plan.

Word count: [46]

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?

The Policy will be effective in ensuring that the requirements for SC2 can be achieved. Ultimately, it will ensure the delivery of a new sustainable community and provides a strong framework for doing so which will be controlled via the Design Brief which is being prepared between the Consortium and will be taken forward to inform subsequent planning applications.

There must be a reasonable and pragmatic approach to the Design Brief to avoid delaying much needed development and further discussion is required on this point between the Consortium and the Council.

Each promoter within the Consortium will be submitting a planning application and therefore the LPA retain control over ensuring that delivery is in accordance with the requirements of Policy HO2.

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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?

SC2 is viable to deliver all of the requirements of Policy HO2, with the exception of affordable housing.

The Consortium's concern regarding affordable housing is set out in the Regulation 19 Representations, specifically under the subheading 'Housing Delivery' when discussing 'Strategic Policies' (page 6). This matter is also addressed in individual parties respective Hearing Statements. The Consortium's fundamental concern is the requirement to deliver 25% affordable housing, along with estimated Section 106 costs and on-site highway, education and leisure contributions.

Each promoter within the Consortium has carried out a significant amount of work to ensure viability and it is noted that there are common landowners across all of the SCs which is a strong sign of deliverability and the ability for the market to support the quantum of housing to be brought forward in a viable manner.

Notwithstanding the above, at individual application stage further viability testing may be undertaken to reflect current costs and site-specific circumstances. For example, it is noted that Parsons and Venning Barracks will be subject to additional demolition and remediation owing to its historic military use.

SC2 is not reliant on any external funding for its delivery.

Word count: [201]

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?

Policy HO2 requires SC2 to deliver 5.6ha of employment land (gross) over the plan period. The current Capacity Study (appended to the Topic Paper for SC2) identifies 4.6ha of employment land (2.1ha to be delivered on Bloor Homes site and 2.5ha to be delivered on the Telford & Wrekin and Mr P Ward site) to be delivered as two strategic employment sites, with the Local Centres delivering the remainder of the policy requirement as flexible class E floorspace.

The Capacity Study does not currently identify Venning Barracks for employment uses. This position has now changed following liaison between DIO and the Council regarding the Site's proposed role and function within the wider SC. Subject to viability and further testing, Venning Barrack should therefore be considered as having potential for employment use as part of the wider SC. Any proposals for employment development will need to be carefully considered in the context of the surrounding area.

Policy HO2 does not specify the form of employment floorspace which provides suitable flexibility around the type to be delivered, ensuring viability and deliverability as there are no constraints on what can be supplied in response to market demand, including the potential for employment uses at Venning Barracks.

There is sufficient flexibility around location as this is to be agreed as part of the Design Brief and the requirements are also clear which would allow the location to be moved to suit market demand and landowner requirements.

Word count: [242]

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 impacts of infrastructure have been fully considered for SC2 and significant technical work has been undertaken, both by the Council and the Consortium.

Beginning with water and flood risk, the Council have commissioned numerous technical assessments and this includes document WF03 (Telford and Wrekin Level 2 Strategic Flood Risk Assessment Addendum) which confirms that SC2 is 95% Flood Zone 1 and only 2% within the 1 in 30 year probability for surface water flooding. The Infrastructure Delivery Plan (IS01) confirms that there is sufficient land for SC2 to be able to site planned development levels outside of flood zones 2 and 3. The evidence base is supplemented by technical work undertaken by the Consortium and their consultants (PJA) who produced a Technical Note (Drainage Strategy Parameters) in January 2025. The January 2025 Drainage Strategy has been developed to serve both the Bloor Homes land and the wider SC development and ensures that it can be delivered together or independently.

The sustainability credentials of SC2 in terms of access to services and amenities using sustainable methods of transport are strong and the evidence base demonstrates this, with the appendix to the Telford Growth Strategy 2025 Refresh (IS05) providing a map of SC2 with public transport links. Additionally, a Sustainable Transport and Movement Strategy (October 2024) has also been prepared by the Consortium and their consultants (PJA) which provides an overview of the Site, including existing travel infrastructure and on-site and nearby facilities. It also includes considerations for walking and cycling and options for serving the site by public transport.

Renewable energy is also an important consideration and on-site renewable energy has also been assessed. This demonstrates the approach to sustainable energy which is part of a wider commitment to create an environmentally

responsible development which carefully considers the immediate needs of the community whilst anticipating the future needs of society in the context of a changing climate.

Word count: [317]

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?

Requirements for infrastructure including onsite facilities will be established in the Design Brief document and key on and off-site infrastructure could be secured via a framework Section 106 agreement or via a memorandum of understanding. Any document will be signed by all parties bringing forward phases of the development and will apply from the first application.

Should there be a need to deliver coordinated infrastructure between the three SC's, it is expected that this would be coordinated by the Council (where common landowner interest cannot achieve this). This will be secured through the use of a framework Section 106 agreement or via a memorandum of understanding, ensuring that each development contributes in a fair and equitable manner to the infrastructure that needs to be provided.

The framework agreement / memorandum of understanding will set out trigger points and thresholds for the delivery of infrastructure such as schools and key onsite facilities such as local centres.

Delivery of offsite infrastructure will be secured through the framework agreement and will be through developer contributions. In the case of highway schemes, direct delivery via Section 278 agreements will also be supported.

There is no need to explain this within the plan as the delivery mechanism will vary depending on what is to be provided, the location and whether it is to be secured through financial contributions or benefit in kind. The Policy's existing text around the requirement for SC's to provide "Contributions to..." or "Delivery of" provides sufficient clarity on the way forward, with the specific mechanisms outlined in the relevant development management policies.

Word count: [261]

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 draft Policy confirms that SC2 is required to provide two primary schools, both comprising of 2FE and nursery provision, unless otherwise agreed with the Local Authority. The delivery of the primary schools should be delivered at a stage agreed with the LPA in line with the projected housing delivery rates.

The Policy provides sufficient clarity that a school / contributions are required by the SC's so that the exception on where these are to be delivered is understood. The detailed requirement can be confirmed by the education authority to meet the specific need at the time the developments are brought forward.

There is a risk that additional information on the requirement will be too restrictive at this point and the necessary education provision will not be delivered in the future. The Consortium are therefore content with the wording included in Policy HO2.

Word count: [143]

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?

Policy HO2 contains the highways and sustainable transport infrastructure that is needed for the successful delivery of SC2. This includes the provision of an active and sustainable travel network, including mobility hubs within the local centres. These should enable the delivery of a number of facilities such as enhanced bus services, EV car charging, car hire, parking, parcel box lockers as well as walking and cycling facilities.

In terms of delivery, the SC must provide delivery of highway and transport infrastructure to an agreed phasing plan to allow for highways adoption as soon as possible. Vehicular access will not be permitted from Wellington Road either during construction or after completion of the SC.

A significant amount of technical work has been undertaken as part of the SC2 and this includes numerous evidence base documents (IS04 – Telford and Wrekin Traffic Modelling Report; IS05 – Telford Growth Strategy Refresh; IS06 – Telford and Wrekin Local Cycling and Walking Infrastructure Plan; IS07 – Telford Bus Service Improvement Plan; and IS08 – Telford and Wrekin Transport Analysis).

These requirements have been borne out of discussions between the County Council, the LPA and the Consortium and are clear evidence. The hook of agreeing a phasing plan gives the Council sufficient control.

Additionally, as the Sites are being brought forward as part of individual applications there is sufficient opportunity to control this as part of each application and the County Council will be statutory consultees.

It is noted that the Council are yet to publish the Highways Topic Paper and this is not anticipated until the end of this month (January 2026). The Consortium therefore reserves the right to comment further upon publication of this document.

Word count: [276]

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?

Each land parcel within SC2 can be accessed from the existing road network, and the approach taken to development and assessment at the application stage will ensure that there will be minimal impact on the highway network.

The strategic masterplan approach ensures that a cohesive development will be achieved, providing through routes between development parcels to retain traffic within and through the site rather than impacting upon existing residents and businesses. This is particularly important for residents on Wellington Road, with the intention that New Trench Road and Richards Road – where there are minimal residents and businesses – will be the main spine roads through the development (as indicated in the vision document).

No other alternative approaches were considered as this would necessitate the use of quieter residential roads that would give rise to larger impacts.

Further work will be undertaken as part of the individual applications which will ensure that appropriate mitigation is put in place, if needed. The approval of applications would be subject to consultation with the County Council and approval from the LPA which provides sufficient control for the Council.

Initial review work has been undertaken which recognises that the following infrastructure projects would be supported by SC2:



1. Clock Tower Roundabout
2. A518 / Wellington Road Roundabout

The final list would be confirmed through the planning application stage when accompanied by detailed assessment of the highway network based upon an individual and cumulative basis, with offsite improvements delivered through appropriate financial contributions and/or s278 agreement.

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Total word count: 2,393