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COMMERCIAL PROPERTY ADVICE



TELFORD AND WREKIN LOCAL PLAN HEARING STATEMENT MATTER 5 – ALLOCATIONS

Land at Bratton, Telford

On Behalf Of:
David Wilson Homes

Prepared By:
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Job Ref: P1826

Date: 22nd January 2026

TELFORD AND WREKIN LOCAL PLAN

HEARING STATEMENT

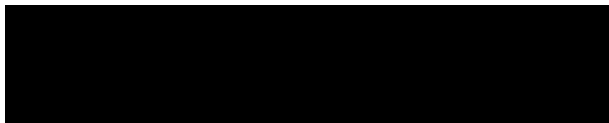
MATTER 5 – ALLOCATIONS

LAND AT BRATTON, TELFORD

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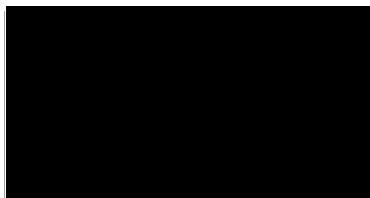


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Date: 22nd January 2026

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2.0 RESPONSE TO INSPECTOR'S QUESTIONS

1.0 INTRODUCTION

- 1.1 Harris Lamb Planning Consultancy are instructed by David Wilson Homes (“**DWH**”) to submit a Hearing Statement in response to Matter 5 - Allocations. Whilst we are generally supportive of the Plan’s allocation policies amendments are required in order for the policies to be found sound.
- 1.2 DWH are promoting land at Bratton, alongside Bloor Homes, which is included as one of the proposed sustainable communities to deliver 2,100 homes and associated facilities (SC1 – Land at Bratton). The allocation will play a key role in the delivery of the Plan’s housing requirement. The principle of the allocation of the site for residential led development is fully supported. We do, however, have concerns with the wording of Policy SC1.
- 1.3 This Hearing Statement should be read alongside the Land at Bratton Statement of Common Ground agreed between BDW, Bloor Homes and Telford and Wrekin Council.
- 1.4 The Submission Version of the Telford and Wrekin Local Plan review (September 2025 – CD08) and the Housing Delivery Topic Paper (TW11) have different housing figures to the Local Plan Review – Publication Version (CD01). This Hearing Statement refers to the Submission Version of the Plan.

2.0 RESPONSE TO INSPECTOR'S QUESTIONS

Issue 1: Whether the allocations and their requirements are justified, effective, and consistent with national policy.

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 No comment

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

2.2 No, it is not clear how the policy should be applied. Part 1 of the policy advises that the housing site allocations are identified in Appendix A (formerly C) and shown on the Local Plan Policies Map. The Sustainable Communities are not identified in Appendix A. They are, however, identified on the Policies Map. This suggests that the provisions of Part 2 Policy HO1 apply to the sustainable communities by virtue of their identification on the Policies Map. However, if that is the case there is considerable duplication between the requirements of Policies HO1 and HO2.

2.3 We suggest that Policy HO1 is amended to include specific text advising that the guiding development principles for the sustainable communities are set out in Policy HO2, and the requirements of Part 2 of Policy HO1 do not apply to the sustainable communities. Part 2 of the policy applies to "qualifying" Appendix A allocations and windfall sites.

2.4 In this regard Part 2 of the policy states the policy's criteria apply to "major" housing developments. The term "major" is not defined by the policy, however, a major development would be a scheme of 10 or more dwellings. The requirements of part 2 of Policy HO1, such as the preparation of a Design

Brief, would be disproportionate and unjustified for a 10 dwelling scheme. The policy should be amended to advise that the Part 2 criteria apply to schemes of 100 dwellings or more. This would reflect the 100 + dwelling reference included in supporting paragraph 9.7.

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

2.5 No comment.

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

2.6 No comment.

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

Question 47 - 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?

2.7 Sustainable Community SC1 – Land at Bratton, is a sustainable, deliverable allocation consistent with national policy and supported by appropriate evidence. It is in accordance with the Plan's development strategy. The land at Bratton Statement of Common Ground confirms the landownership arrangements, details of the proposed development, infrastructure requirements and the Site's housing delivery trajectory. It is to be read in conjunction with this Hearing Statement.

2.8 The entirety of the Site is under the control of two housebuilders, BDW and Bloor Homes, who have been working together to deliver the Site. Two

planning applications are being prepared, which together will propose the development of the entire allocation.

- 2.9 Whilst we fully support the allocation of land at Bratton, as detailed in the Statement of Common Ground the Policy SC1 requires amending in order for it to be found sound.
- 2.10 The Pre-Submission Plan requires the development of the Site to be undertaken in accordance with a Design Brief and Masterplan for the whole allocation which must be *“completed and agreed as part of the pre-application process for the development of the site”*.
- 2.11 The Bratton Sustainable Community is expected to deliver housing promptly. Appendix 2 – Anticipated Housing Delivery and Completions by Allocation, of the Housing Topic Paper identifies land at Bratton delivering first completions in 2028/2029. Requiring the Design Brief and Masterplan to be agreed as part of the pre-application process has the potential to slow down the submission and determination of applications. It is suggested that the policy is amended to require the Design Brief and Masterplan to be agreed and approved prior to determination of the first planning application proposing the development of the Site. This will help facilitate prompt delivery.
- 2.12 A Design Brief has already been provided to the Council for comment.
- 2.13 The “delivery” section of the policy requires “any application” for the Site to coordinate uses across the site, based on effective community engagement and reflecting local aspirations. The policy also requires preparation of the Design Brief and Masterplan ahead of the determination of any application. The Design Brief and Masterplan are also required to coordinate uses and the policy requires community constitution. There is a duplication of requirements within the policy. The policy should not require an application submission to repeat the work undertaken in the Design Brief and Masterplan. It should simply require applications to be in accordance with the Design Brief and masterplan.

- 2.14 The “Delivery” section of the policy is unclear. It advises that “the Site” must provide various details to allow for an effective and comprehensive delivery of a sustainable community. This section of the policy provides a mix of potential developer contributions, guidance on phasing, and on site mitigation such as landscaping buffers. This section of the policy could usefully be re-written to confirm which of these matters will be addressed in the Design Brief and Masterplan, and what matters should be included for consideration within the application submissions. For example, the policy requires phasing plans “to be considered” as part of the Design Brief process. The delivery section to the policy also refers to the need for phasing plans with planning applications. It should not be necessary to provide the same information twice. Phasing plans should only be required with applications if they depart from the phasing information in the Design Brief.
- 2.15 The policy requires play, recreation and outdoor sports infrastructure to be provided on site in line with the Council’s adopted Playing Pitch and Outdoor Recreation Strategy using the Sport England’s calculator. We are concerned with this approach. This section of the policy effectively elevates the Council’s Playing Pitch and Outdoor Recreation Strategy to having policy status. The requirements of the Playing Pitch and Outdoor Recreation Strategy have not been tested through the plan making process. It is inappropriate for the policy to require the application of these untested standards. The section of the policy should be amended to advise that the Council’s Playing Pitch and Outdoor Recreation Strategy will be a material consideration in the determination of the playing pitch or an outdoor sports provision on site. It should not, however, be applied rigidly.

Question 48 - 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?

- 2.16 BDW and Bloor are confident that the delivery trajectory for the Bratton Sustainable Communities is realistic. This is confirmed in the build out strategy included within the Statement of Common Ground. Planning applications are being worked up for the entire site. It is BDW's intention to submit a full planning application for the land in their control facilitating early delivery.

Question 49 - Do any of the proposed requirements of Policy HO2 for each site conflict with or duplicate the other policy requirements of the Plan?

- 2.17 As referred to in our response to Question 45, as drafted Policies HO1 and HO2 include duplication. There is also duplication within the policies in the Plan. For example, Policy HO2 requires "*a range of multi-generational living accommodation that includes accommodation for the elderly, supported specialist provision and accessible housing*". This is also required in Policy HO3 – Housing Mix and Quality, Part 1.
- 2.18 In our view HO2 should be amended to delete text relating to matters addressed in other policies within the Plan.

Question 50 - 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?

- 2.19 As referred to in our response to Question 48 aspects of the policy are confusing. The Policy should confirm what matters should be addressed in the Design Brief and Masterplan, and what are the specific requirements of the application submission.
- 2.20 BDW are of the view that the specific infrastructure requirements identified in Policy HO2 in respect of land at Bratton are appropriate. The policy advises

the infrastructure supporting facilities required with the allocation and requires phasing arrangements to be agreed ensuring that they are delivered.

Question 51 - 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?

- 2.21 BDW are of the view that their section of the land at Bratton allocation is entirely deliverable. No third party funding is required. A planning obligation package compatible with the emerging Local Plan's policies will be proposed.

Question 52 - (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?

- 2.22 No Comment

Question 53 - 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?

- 2.23 The section of the Bratton Sustainable Community under BDW's control is free of flood risk. It is not a constraint to development. As part of the preparation of the forthcoming planning application BDW have undertaken due diligence, and there are no known infrastructure constraints to development.

Question 54 - 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?

- 2.24 The Bratton Sustainable Community is in the control of two housebuilders, BDW and Bloor Homes. The fact that the entire site is controlled by just two housebuilders helps simplify and ensure delivery. This significantly simplifies infrastructure delivery across the Site. A contractual agreement will be prepared between both parties to ensure appropriate contributions are made towards infrastructure provision.

Question 55 - 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?

- 2.25 SC1 requires the provision of a primary school, comprising a three form entry and nursery provision (unless otherwise agreed with the local authority). It also requires the preparation of a Design Brief and Masterplan. It is our view that this approach is entirely appropriate.
- 2.26 The Design Brief and Masterplanning process can, if necessary, specify the exact location and the size of the school within the Bratton allocation ahead of the approval of any planning application. The policy wording also helpfully includes the wording “*unless otherwise agreed with the local planning authority*” allowing for a change in the level and type of provision should matters progress. As such the policy does not need to specify the size of the schools.

Question 56 - (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?

- 2.27 BDW and Bloor have been working together, and with the Highway Authority, to agree the transport strategy for the site and off site mitigation requirements.

Subject to appropriate offsite mitigation, that will be funded by the developers, where appropriate. As such, the development is deliverable.

Question 57 - (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?

2.28 No comment

Question 58 - 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?

2.29 No comment

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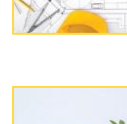
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