

Hearing Statement: Matter 6

Telford and Wrekin Co-operative Council – Local Plan Examination

23 January 2026 | Confidential

Matter 6 – Development Management Policies

Introduction

- 1.1 This Hearing Statement has been prepared by Knight Frank on behalf of Telford Trustee No.1 Ltd and Telford Trustee No.2 Ltd ('The Trustees').
- 1.2 We submitted our representations to the Regulation 19 Draft Local Plan in May 2025. The Regulation 19 representations Representor ID being E142.
- 1.3 As part of the Local Plan Examination Submission, Telford and Wrekin Co-Operative Council ('TWCC') published a Statement Prepared under Regulation 22 (1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 outlining the Council's response to the Regulation 19 consultation comments received.
- 1.4 The representations were submitted in respect of the Trustees' landholdings at Blue Willow Car Park (Site Allocation MU2) and Lime Green Car Park (Site Allocation MU3) (together 'the Sites'), as well as other Local Plan policies affecting town centre development.
- 1.5 Paragraph 36 of the National Planning Policy Framework ('NPPF'), which the Local Plan will be considered against, 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** – seeking to meet 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, 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; and
 - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.
- 1.6 A Draft Local Plan should comply with the above criteria to be considered in compliance with the NPPF.

Issue 1: Whether the other housing policies are justified, effective, and consistent with national policy.

Policy HO3 (Housing Mix and Quality)

Question 59: Are the requirements of Policy HO3 including requirements for internal space standard (Criterion 2) and M4 (2)/M4 (3) housing justified by the evidence? Can all developments provide a mix of house types and sizes?

Response:

- 1.7 While the Trustees broadly support Policy HO3 as set out within the Draft Local Plan, we have concerns in relation to whether Policy HO3 sufficiently accounts for a realistic provision in housing mix. As drafted, the policy and supporting text do not sufficiently reflect differing market conditions, typologies and physical constraints - particularly for town-centre regeneration sites. Nor do they provide adequate flexibility to secure a realistic and deliverable housing mix. In this context, a blanket expectation that all developments deliver a full mix of types and sizes is neither justified nor effective.

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- 1.8 Viability within Telford Town Centre is materially different from out-of-centre locations. To ensure permissions translate into deliverable schemes, Policy HO3 should acknowledge that higher-density development supported by a greater proportion of smaller homes (1- 2 bed units) and perhaps excluding larger homes will often be necessary and appropriate in town-centre locations – subject to submission of appropriate evidence. Requiring a high number of 3 bed homes in town centre/central locations is likely to harm viability and deliverability. Values of 3+ bed homes with gardens in less central locations will compare favourably (for a buyer) with new build homes in a Town Centre. The ability to sell these larger units in the Town Centre may prove challenging in this context, and therefore impact the viability of schemes. Focusing 1 and 2 bed units in the central locations, including Telford Town Centre, is an approach which will optimise the efficient use of land in highly accessible areas and supports regeneration objectives. The Trustees ask the Inspector to consider our previously submitted suggested supporting text.

Response to Main Issue Wordcount: 309

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