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COMMERCIAL PROPERTY ADVICE



TELFORD AND WREKIN LOCAL PLAN HEARING STATEMENT MATTER 4 – STRATEGIC POLICIES (OTHER THAN HOUSING)

Land at Bratton, Telford

On Behalf Of:
David Wilson Homes

Prepared By:
John Pearce BSc (Hons) MTPL MRTPI



Job Ref: P1826

Date: 21st January 2026

TELFORD AND WREKIN LOCAL PLAN

HEARING STATEMENT

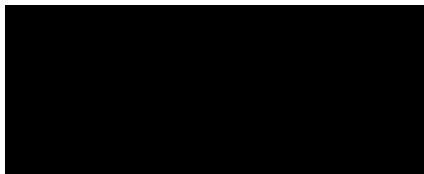
MATTER 4 – STRATEGIC POLICIES (OTHER THAN HOUSING)

LAND AT BRATTON, TELFORD

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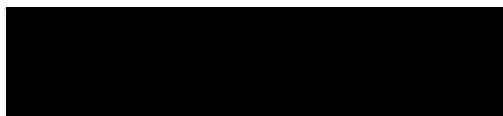


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Print Name: Simon Hawley

Date: 21st January 2026

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1.0 INTRODUCTION

- 1.1 We are instructed by David Wilson Homes ("**DWH**") to submit further comments by way of this Hearing Statement to the Inspector's Matter 4 questions that relate to the strategic policies (other than housing).
- 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. DWH, therefore, are generally supportive of the Plan as a whole although suggested changes are sought to make the Plan sound as set out in our representations and further submissions below.

2.0 RESPONSE TO INSPECTOR'S QUESTIONS

Question 34 – Are policy strategic S1 and policy strategic S2 worded clearly enough such that there is no ambiguity or lack of understanding as to what is expected of development proposals?

- 2.1 DWH consider that policy S1 is sufficiently clear and unambiguous.
- 2.2 In respect of Policy S2, DWH have no in principle concerns with the policy, however we consider that the use of the word “protect” in the last sentence of criteria b. should be replaced with “promote”.

Questions 35 to 39 – No Comment

Question 40 – Is policy strategic S5 sufficiently clear how development proposals should mitigate and adapt to climate change and how such proposals will be considered?

- 2.3 No, the policy is not sufficiently clear how development proposals should mitigate and adapt to climate change. For example, part 1 of the policy states that development should positively contribute to meeting local and national targets. The policy, nor the supporting text, does not state what these targets are. It is not clear what would be required to comply with the policy if the targets are not stated. Similarly, the words “positively contribute” does not provide sufficient clarity as to what extent of contribution development should make to addressing climate change. The policy would benefit from a clear statement of what any reduction or target should be. Any target should be consistent with national policy and should not duplicate Building Regulations.
- 2.4 In terms of how development proposals would be considered DWH highlight the similarities between the criteria a to f within the policy to other policies in the Plan such as those requiring active travel/sustainable travel or POS provision or matters that are addressed by other statutory regulations. This includes Building Regulations and the requirements for EV charging for

example. As these are matters that are dealt with elsewhere their inclusion here is repetitive and not necessary.

- 2.5 A similar point to the one above can also be made in respect of criteria g to k at point 3 of the policy as these, and also other matters, are addressed elsewhere under other policies or regulatory systems of control.
- 2.6 Finally, comments were submitted in the Regulation 19 representations about the requirements for Sustainability Statements to accompany planning applications. This requirement poses an additional cost to developers when submitting planning applications when the system of Building Regulations is more than adequate to ensure that dwellings comply with the latest emissions and environmental standards. Furthermore, Building Regulations are regularly updated and which ensures that development complies with the most up to date standards that are in place when development takes place. If Sustainability Statements are required the policy is not clear as to what extent they must demonstrate a contribution to mitigating and adapting to climate change. The need to include the wording of the policy or its amendment need to be considered.

Question 41 – Is policy strategic S6 sufficiently clear how development proposals should contribute to healthy strong communities? In particular, is the approach to proposals for hot food takeaways, betting shops and vape shops (criterion F) sufficiently clear and unambiguous and justified by the evidence? What does “over dominance” mean?

- 2.7 DWH consider the wording of parts a to e of the policy are sufficiently clear and development proposals should contribute to healthy strong communities.
- 2.8 We have no comments in respect of part f of the policy.

Question 42 – Is policy strategic S7 justified, consistent with the evidence and does it accord with the relevant regulations?

- 2.9 As stated in DWH Regulation 19 representations we do not consider that some of the items and contributions that may be collected would be CIL compliant. These principally relate to non-capital items associated with development.
- 2.10 Similarly, we reiterate our comments that the Framework (2023) does not contain a policy on clawback mechanisms and as such this requirement should be deleted from the policy.

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