

**Barratt Redrow**

# **Telford Local Plan Examination: Matter 6**

Date of report: 23/01/2026

**savills**

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## Document History

Issue	Date	Issued by	Comment
1.0	23/01/2026	MB	

# 1. Introduction

- 1.1 Savills has been instructed by Barratt Redrow to submit a Hearing Statement in response to Matter 6 of the Telford Local Plan Examination. This Statement expands upon the representations submitted to Telford and Wrekin Borough Council (“the Council”) at the Regulation 19 consultation stage of the Local Plan and provides a response to: Issue 1 Questions 59, 61, 62 and 65; Issue 2 Questions 68, 69, 71 and 72; Issue 3 Questions 90, 91 and 92; and Issue 4 Questions 99, 100, 101, 102 and 104.
- 1.2 Barratt Redrow is promoting land to the south east of Newport, which is located in 3 distinct parcels: land east of A518 and west of Chetwynd Aston / Littlehales Road (Parcel 1); land west of A41 and south of A518 (Parcel 2); and land east of the A41 (Parcel 3). Parcels 2 and 3 include land within proposed employment land allocations EC2, EC3 and EC4.

## 2. Issue 1

***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?***

- 2.1 The Planning Practice Guidance (“PPG”)<sup>1</sup> states that Local Planning Authorities have the option to set additional technical standards exceeding the minimum Building Regulation requirements, through setting appropriate policies in Local Plans.
- 2.2 In relation to Nationally Described Space Standards (“NDSS”) the PPG<sup>2</sup> sets out a requirement to consider need, viability and timing. It is noted that viability has been considered within the submitted viability assessments. However neither the Economic and Housing Development Needs Assessment reporting nor the Housing Delivery Topic papers include consideration of need and timing. The NDSS requirement included in the Local Plan is accordingly not deemed to be justified by appropriate evidence.
- 2.3 Local Plan Policy HO3 does not include a specific additional requirement in relation to M4(2) and M4(3) dwellings, which means that the default position would be the latest Building Regulations requirement. Planning policy wording does not need to state that developments need to conform with Building Regulations and therefore criterion 6 is not deemed to be necessary.

***Question 61: Are the provisions of Policy HO4 in terms of affordable housing requirements justified by the evidence and deliverable?***

- 2.4 The PPG<sup>3</sup> is clear on the importance of viability being clarified at the plan-making stage. It is noted that there has been a change in the way in which the evidence base has reported the viability and deliverability of affordable housing at Newport.
- 2.5 The Whole Plan Viability Assessment (2023) recommends 20% affordable housing is viable within Newport and this is reiterated in the subsequent Update Note<sup>4</sup>. However the, the viability test results reported in the Update Note<sup>5</sup> propose that 35% is appropriate in Newport and the rural areas. The evidence base is not clear as to why this viability position has changed. In addition, the inclusion of ‘subject to viability’ wording within the policy is also considered to be necessary (under the requirements of December 2024 NPPF paragraph 34) in order to ensure that the Local Plan policies do not undermine the deliverability of the Local Plan.

***Question 62: Is it clear how Policy HO4 and Policy HO5 are expected to work together? In particular, are the policies clear and unambiguous in respect of reduced or zero provision in terms of how criterion 4 of Policy HO4 and criterion 3 of Policy HO5 apply and relate to each other?***

- 2.6 Policies HO4 and HO5 both reference affordable housing tenure mix, the mechanism for securing affordable housing and the process to follow where a reduction in affordable housing provision is

<sup>1</sup> Planning Practice Guidance Paragraph: 002 Reference ID: 56-002-20160519. Revision date: 19 05 2016.

<sup>2</sup> Planning Practice Guidance Paragraph: 020 Reference ID: 56-020-20150327. Revision date: 27 03 2015.

<sup>3</sup> Planning Practice Guidance Paragraph: 002 Reference ID: 10-002-20251216. Revision date: 16 12 2025.

<sup>4</sup> VS02. Telford & Wrekin Council Regulation 19 Viability Note – December 2024. Paragraph 5.32.

<sup>5</sup> VS02. Telford & Wrekin Council Regulation 19 Viability Note – December 2024. Paragraph 6.9, Appendix 1 and Appendix 2.

being sought. In order to avoid duplication and reduce the potential for confusion it would be preferable for a single affordable housing policy to be drafted.

- 2.7 However should the inclusion of both Policies HO4 and HO5 prevail then in order for the provisions to be clear, consistent and unambiguous: Policy HO4 criterion 2 (tenure mix) should specifically reference the need to comply with the provisions of Policy HO5 criterion 1; and criterion 4 of Policy HO4 and criterion 3 of Policy HO5 should consistently refer to the potential to reduce affordable housing provision through application of vacant building credit and / or submission of a viability assessment.

***Question 65. Is Policy HO11 justified and supported by the evidence in its approach to self-build and custom housebuilding?***

- 2.8 The Self-Build and Custom Housebuilding Act 2015 places a duty on councils to keep and have regard to a register of people who are interested in self-build or custom build projects in their area. Whilst the self-build and custom build register is not available to view, the EDHNA Update<sup>6</sup> reports that 221 entries were recorded on the register for the period 2016-2023 (an average of 28pa) and that the total number of planning permissions granted for the same period amounted to 137 dwellings (an average of 17pa). This average range of 17-28pa would broadly translate to 340-560 dwellings for the 20 year Local Plan period. If only a 3% requirement<sup>7</sup> is applied to the major allocations then this would still be expected to result in a delivery in excess of this range.
- 2.9 Furthermore the proposed approach also disregards the contribution which can be made to meet a self-build or custom build need through the use of small sites, including on windfall opportunities. It should also be noted that the delivery of self-build / custom build plots as part of a major development scheme can present a number of operational and health and safety issues which have the potential to complicate and delay the progression of development sites. Paragraph 73b of the December 2024 NPPF is clear that Local Planning Authorities should seek opportunities through policies to support small sites to come forward for self-build and custom-build housing. In this regard the proposed requirement is not considered to be either justified or in accordance with paragraph 36 of the December 2024 NPPF.

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<sup>6</sup> Telford and Wrekin Employment and Housing Development Needs Assessment Update. February 2025. Paragraphs 7.149-7.150.

<sup>7</sup> It is noted that the Submission version of the Local Plan (CD08) proposes to reduce the element of self-build or custom build housing on development sites of 100+ new dwellings from 5% of the total dwellings to 3% of the total dwellings.

## 3. Issue 2

***Question 68: (a) Are the boundaries of the Strategic Employment Areas (SEAs) justified? (b) Do the SEAs need to be identified in the Plan for it to be sound?***

- 3.1 The boundary of the SEA to the south east of Newport is considered to be justified. As set out in response to Matter 4 Question 36 the proposed allocations EC2, EC3 and EC4, which contain land being promoted by Barratt Redrow, are considered to be: necessary in order to provide additional employment land to meet a variety of sectoral needs, address local employment requirements for the Newport Sub-Area and contribute towards meeting the employment land needs of the wider Borough; suitably located adjacent to the second largest settlement in the Borough and existing and proposed commercial development; in close proximity to the strategic road network, including accessibility to the M54; available for development immediately; deliverable; and justified by the Local Plan evidence base.

***Question 69: Use Class E includes various main town centre and community uses such as shops, food and drink uses, professional services, indoor sport and recreation, medical services and day nurseries. Are such uses supported in SEAs? If not, how will this be managed and is this clear?***

- 3.2 Paragraph 8.11 of the Publication Local Plan identifies the need for proposals for alternative uses within SEA areas to demonstrate they are ancillary and complementary to the primary function of the SEA. This should be made clear within the policy wording. Nevertheless specific confirmation should also be provided that ancillary and complimentary uses can include uses such as local retail / food and drink / gymnasium and day nursery provision where this is demonstrated to directly benefit those working in that employment area. The absence of such facilities can, in some instances, increase travel demand and make areas less attractive to employers and staff. There is also an opportunity for scale / size criteria to be introduced to control such uses if deemed necessary.

***Question 71: Are supporting paragraphs 8.9, 8.11 and 8.14 clear and effective in explaining the policy approach in SEAs?***

- 3.3 Please refer to the response to Question 69.

***Question 72: (a) Are the marketing information requirements in paragraph 8.12 justified and effective? (b) Are they intended to apply only outside of SEAs and, if so, is that clear?***

- 3.4 It is not expressly clear whether the marketing requirements set out in paragraph 8.12 of the Publication Version of the Local Plan only apply outside of the SEAs or whether they can also apply to SEAs. In order for the marketing requirements to be effective a marketing period should be included. It is noted that paragraph 8.14 of the Submission Version of the Local Plan (CD08) proposes a maximum marketing period of 12 months. It would however be more effective to define a minimum marketing period, e.g. minimum of 6 months.

## 4. Issue 3

***Question 89: Is the relationship between Policy Strategic S5 part 4 and the CC policies clear enough to be effective?***

- 4.1 Either part 4 of Policy Strategic S5, or the supporting text to this Policy, should cross-reference to the Climate Change policies which the required Sustainability Statement should be addressing.

***Question 90: Are the requirements in Policy CC1 intended to exceed standards in current and/or future Building Regulations? If yes, is this clear, and are the requirements justified and consistent with national policy? What effect will they have on development viability?***

- 4.2 As explained in the response to Matter 5 Question 40, local efficiency standards above national Building Regulations should only be imposed where robust costed evidence has been provided. Such evidence has not been provided in this instance and therefore the relevant national standards remain the Building Regulations. It is considered that some of the proposed requirements set out in Policy CC1 do exceed current national standards. This is not made expressly clear.

- 4.3 In this regard there should be no absolute requirement for development to: provide for energy needs by using on-site or local renewable energy sources; be entirely constructed from materials with high thermal mass, low embodied carbon and durability; and demonstrate where Modern Methods of Construction have been used. The proposed amendment to Part 1 of this Policy within the Submitted Version of the Local Plan (CD08) would address the Part 1 concern. The inclusion of “*where practical and viable*” at the start of Part 2, as proposed within the Submission Version of the Local Plan (CD08) would also represent a positive amendment. However it is considered that a specific amendment should also be made to the wording of parts 2d and 2h of the Policy, which could include a provision to encourage, rather than require, these particular aspects.

- 4.4 Furthermore Point 3 of the Policy states that “*all development should aim to achieve net zero carbon emissions*”. In order for this proposal to be effective, clarification needs to be provided to set out how this is to be measured and confirmation needs to be given that development proposals which do not achieve net zero carbon emissions will not be refused.

***Question 91: Is part 1 [of Policy CC2] justified and realistic for all development? Is there any unnecessary duplication with Policy CC1?***

- 4.5 Clarification is still required as to what the Council defines as “*local renewable energy sources*”. It should be taken into account whether the most efficient and environmentally friendly way of energy generation may be via the national grid, which is becoming increasingly less reliant on fossil fuels, rather than potentially inefficient small scale solutions. It also may not be feasible, appropriate, viable or necessary for all new development to incorporate renewable energy and storage onsite. Paragraph 35 of the December 2024 NPPF makes it clear that Local Plan policies setting specific development requirements should not undermine the deliverability of the Local Plan. In this regard the revisions proposed to Part 1 of this Policy within the Submission Version of the Local Plan (CD08) would improve the effectiveness of the Policy.

***Question 92: Are the policy's other requirements justified and effective, and do they include sufficient flexibility to be deliverable?***

- 4.6 Building Regulations Part O aims to prevent overheating in new dwellings. Heating and cooling of new buildings is therefore an important consideration. However it is unclear how the proposals

relating to heating and cooling set out in Points 4-6 of Policy CC2 have been taken into consideration through the viability evidence base, notably in terms of communal heating systems, heat networks and use of renewable energy. Further guidance should also be provided on how compliance with the identified hierarchy is expected to be demonstrated within the requested Heating and Cooling Strategy. In this regard it is considered that this proposed policy provision requires further justification and explanation in order to demonstrate that it is effective and deliverable.

## 5. Issue 4

***Question 99: Is the meaning of “appropriate buffer zones” in part 4c sufficiently clear?***

- 5.1 Buffer zones can have big implications on the design, capacity and deliverability of development sites. The effectiveness and application of this policy provision would be improved through the provision of guidance on: what constitutes an appropriate buffer zone distance for particular land uses, species and designations with reference to nationally accepted standards where possible; and what activities / landscaping might be acceptable within these buffer zones.

***Question 100: (a) Is the policy clear and unambiguous enough to be effective, particularly parts 2a and 5? (b) What is the justification for the species mix specified in part 2c?***

- 5.2 Clarification needs to be provided to confirm whether the reference within Part 2a of the Policy to the ‘impact of proposals on trees, hedgerows and woodlands’ is referring to the complete loss of these features. It is also not clear what the justification is for proposing 50:50 native and non-native climate and disease resistant tree species. In terms of the need to buffer irreplaceable habitats referenced within Part 5 of the Policy, please refer to the answer to Question 99.

***Question 101: (a) Is part 3 consistent with national policy? (b) Are the circumstances in which tree loss would be supported sufficiently clear, including in relation to commercially managed woodland/plantations?***

- 5.3 The NPPF does not recognise the term ‘mature trees’. Therefore proposing that development which would lead to the removal of mature trees would only be supported where wholly exceptional reasons and compensation strategy are provided is not considered to be consistent with the NPPF and has not been robustly justified within the evidence base. The amended wording proposed within the Submission Version of the Local Plan (CD08) addresses this particular point.

***Question 102: Is the aspiration for qualifying development to achieve 20% BNG, subject to viability, justified and consistent with national policy and guidance? Is it clear, so as to be effective, what is expected from development proposals? What effect will the policy have on housing delivery and other Plan requirements, including affordable housing and infrastructure?***

- 5.4 The policy is not considered to be justified or accord with the requirements of the PPG<sup>8</sup> on the basis that it is seeking for all developments to achieve in excess of the 10% mandatory requirement (with an aspiration of 20%), without the necessary supporting evidence on: local need or opportunities for a higher percentage; impacts on viability for development; and implementation.

- 5.5 It is also noted that the Whole Plan Viability Assessment Update Note (December 2024) states that delivering 20% BNG is expected to cost 150% of the cost of delivering 10% BNG. Delivering a higher than mandatory amount of BNG will accordingly add additional cost to development and / or may impact on the net developable area, which could in turn limit developers’ ability to deliver other S106 obligations such as affordable housing.

<sup>8</sup> Planning Practice Guidance Paragraph: 74-001-20240214.

***Question 104: What is the justification for the DGF in addition to BNG? Is there evidence to show the Greening Factors of 0.4 for major residential-led, and 0.3 for major non-residential-led development, are deliverable, taking account of other Plan requirements?***

- 5.6 The existing Biodiversity Net Gain (“BNG”) requirement, as set out in Policy NE3, already necessitates improvements to urban greening through the statutory requirement to demonstrate 10% BNG. New on-site public open space and SuDS features as part of new development also provides greening. The additional impact of imposing a DGF on development proposals was not assessed within the Regulation 19 Viability Note (December 2024) and therefore has the potential to add significant costs associated with the ongoing maintenance of features such as green walls and roofs and / or result in a reduced net development area.
- 5.7 The Green Space Factor Study (2023) includes case studies of the Greening Factor of schemes that have come forward recently in Telford and Wrekin Borough. In relation to the residential case studies (Table 2 of the Study), only one of the seven case studies meets the 0.4 DGF and the average DGF of these schemes is 0.3. Furthermore the average DGF of the three non-residential (industrial, commercial and education use) schemes reviewed is 0.28. The single industrial case study included within the report has a DGF of just 0.06, which is significantly below the proposed policy requirement of 0.3. This Study therefore does not provide robust justification for the use of DGF.
- 5.8 It is also unclear how any offsite delivery of DGF (under Point 4 of the Policy) would interrelate with the delivery of BNG. In the absence of a clear demonstration of the deliverability and achievability of the proposed DGF scores within development proposals in the Borough, this particular Policy provision is deemed to be contrary to the requirements of paragraphs 16b, 32 and 36 of the December 2024 NPPF.

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