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COMMERCIAL PROPERTY ADVICE



TELFORD AND WREKIN LOCAL PLAN HEARING STATEMENT MATTER 6, ISSUE 1

Land at Bratton, Telford

On Behalf Of:
David Wilson Homes

Prepared By:
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Job Ref: P1826

Date: 21st January 2026

TELFORD AND WREKIN LOCAL PLAN

HEARING STATEMENT

MATTER 6, ISSUE 1

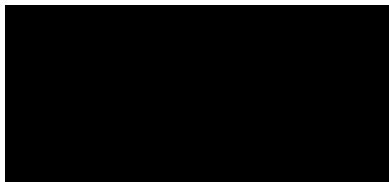
LAND AT BRATTON, TELFORD

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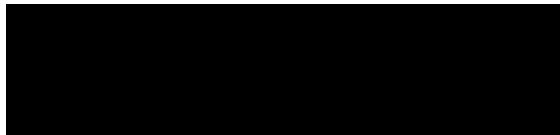


Print Name: John Pearce

Date: 21st January 2026

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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 6 questions that relate to Issue 1.
- 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

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?

- 2.1 DWH set out in its Regulation 19 representations that the requirement for all developments to meet Nationally Described Space Standards (“**NDSS**”) was not justified. DWH maintain that position on the basis that the evidence of need for all homes to comply with NDSS has not been provided.
- 2.2 The intention to require NDSS is in accordance with paragraph 135 and footnote 52 of the Framework. However, the PPG confirms that Local Planning Authorities should provide justification for requiring internal space policies taking account of needs, viability and timing (PPG Ref ID: 56-020-20150327).
- 2.3 The Telford and Wrekin Local Plan Review Viability Study (VSO1) comments on the viability of NDSS at paragraph 9.4. The Viability Assessment does not address the impacts on affordability where a space standard is adopted. The Council also comments on the viability of NDSS on the supply of land stating that its application will not impact on the need for or quantum of land to be allocated, although no evidence is provided for this conclusion.
- 2.4 In respect of M4(2) and M4(3) dwellings it would be simpler and more appropriate to require adherence to a national standard as set out in Building Regulations as opposed to a local standard which may differ from the

requirement in Building Regulations. This is especially likely if Building Regulations change after the adoption of the Plan.

- 2.5 In response to the final part of the question, not all developments can provide a mix of house types and sizes. For example, apartment led schemes are likely to focus on one and two bedroom units, whereas a sustainable community such as the land at Bratton would have a wider scope to deliver a range of different units, sizes and types.
- 2.6 The Plan should, therefore, seek to meet housing needs across the Plan area as a whole rather than requiring every development site to try to accommodate the full range of different types of dwellings and sizes. Site specific constraints or characteristics will make certain sites eminently more suitable to delivering certain types of housing than others. As such, the Council should take a pragmatic view as to what sites seek to accommodate what form of housing.

Question 61 – No Comment

Question 65 – Is Policy HO11 justified and supported by the evidence in its approach to self-build and custom house building?

- 2.7 No, DWH consider that the requirement for 5% of units to be provided as self-build plots on all sites over 100 units significantly exceeds the requirement for self-build within the District. If 5% of the total units on the three sustainable communities were developed as self-build this would equate to 325 plots. Taking the average number of permissions granted per year and applying this to the Plan period would equate to 189 plots. The 5% requirement on the sustainable communities alone would therefore significantly exceed the requirement. This also ignores the fact that other sites of 100 or more units would also need to contribute 5% units as self-build. As such, DWH consider that the 5% requirement significantly over-states the need for self-build and that a lower percentage would be more appropriate. Even at 1% the sustainable communities would still deliver 1/3 of the self-build units. This

would require other developments to deliver some of the self-build units, which would distribute self-build opportunities more widely across the District.

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