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COMMERCIAL PROPERTY ADVICE



TELFORD AND WREKIN LOCAL PLAN HEARING STATEMENT MATTER 6, ISSUE 3 – DEVELOPMENT MANAGEMENT POLICY

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 3 – DEVELOPMENT MANAGEMENT POLICY

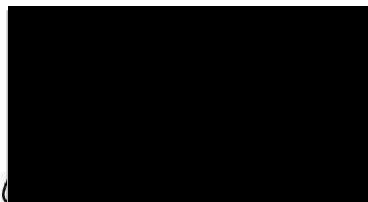
LAND AT BRATTON, TELFORD

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Print Name: John Pearce

Date: 21st January 2026

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Print Name: Simon Hawley

Date: 21st January 2026

CONTENTS

1.0 INTRODUCTION

2.0 RESPONSE TO INSPECTOR'S QUESTIONS

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 3.
- 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 3: Whether the Climate Change (CC) policies are justified, effective and consistent with national policy.

Question 89 – Is the relationship between Policy Strategic S5 Part 4 and CC policies clear enough to be effective?

- 2.1 DWH in their Regulation 19 representations objected to the need for Sustainability Statements to be submitted alongside planning applications. If Sustainability Statements are to be required to accompany planning applications DWH consider that Part 4 of Policy S5 could be clearer in terms of what they are to contain. There is a degree of duplication in the content of a Sustainability Statement and what would be required to demonstrate compliance with other Climate Change policies in the Plan. For example, to comply with Policy CC2 it must be demonstrated that development incorporates renewable energy production and storage on site. DWH consider that this is unnecessary duplication. Policy S5 Part 4 should refer to compliance with the other Climate Change policies rather than requiring a separate report to also demonstrate compliance.

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?

- 2.2 It is not clear if the policy intends for development to exceed standards in current and/or future building regulations. If the intention is for developments to exceed building regulations DWH do not consider that there is a robust basis for requiring this and it blurs the line between the planning system and other systems of regulatory control.
- 2.3 The policy would benefit by clarifying that development should fully accord with the Building Regulations in place at the time. In doing so, it would enable

development to accord with ever increasing high environmental standards brought about through revisions to Building Regulations. As Building Regulations are periodically updated this would ensure development is fully in accordance with the latest environmental standards and would reduce confusion about which standard would have to be adhered to in order to comply with the policy.

- 2.4 Removing any requirement or suggestion that development should exceed current or future building regulations should negate viability concerns as any development would have to accord with relevant Building Regulations in place at the time of the development. This would greatly simplify matters. The current consultation on the draft Framework seeks to clarify the position in respect of planning and other regulatory controls. Once adopted it will be a material consideration in the determination of future planning applications.

Question 91 – Is Part 1 justified and realistic for all development? Is there any unnecessary duplication with Policy CC1?

- 2.5 No, DWH are not aware that there is a requirement set out in national policy or regulations for all new development to incorporate renewable energy production and storage. Delivery of renewable energy production and storage on site may not be realistic for all developments. Apartment/flatted development for example may not be able to incorporate specific measures for individual units. Whilst a traditional housing scheme may be better able to accommodate renewable energy production and storage DWH consider that the objective of the policy crosses over with Policy CC1. Part 1 of Policy CC2 could be helpfully incorporated within Policy CC1 to simplify the Plan.

Question 92 – Are the policies and other requirements justified and effective, and do they include sufficient flexibility to be deliverable?

- 2.6 DWH objected to the requirement in the policy to connect to community or district heating or power networks. Suggested amendments could include changing the requirement to “explore” rather than require them as options.

Such Schemes are likely to have a significant negative impact on project viability and delivery.

Question 93 – No comment

Question 94 – Are the requirements in Policy CC4 Part 2 justified and deliverable?

- 2.7 The Telford and Wrekin Council's Water Cycle Study Phase 2 Report (WF06) concludes that the high standard of 110 litres/person/day is warranted.

Question 95 – No comment

Question 96 – No comment

Question 97 – No comment

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