

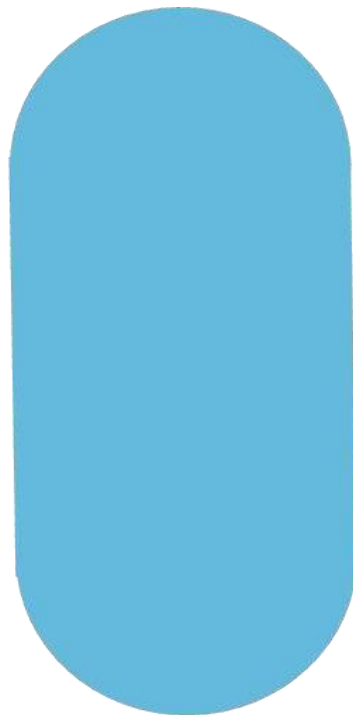


Statement in Respect of the Telford and Wrekin Local Plan Examination

Matter 6 – Development Management Policies

On Behalf of the Wappenshall Consortium

January 2026



1. INTRODUCTION

- 1.1 This Hearing Statement has been prepared by Marrons on behalf of the Wappenshall Consortium with respect to Matter 6 – Development Management Policies. The Consortium control SC3 Land North of A442 Wheat Leasows.

2. MATTER 6 – DEVELOPMENT MANAGEMENT POLICIES

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

Policy HO3 Housing Mix and Quality

Q59 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 Consortium consider that Policy HO3 is unclear as Part 1 states that development is to plan positively for a range of housing types, tenures and sizes including b. Look after children, which is not defined. In addition, the inclusion of k. Gypsies and travellers is unnecessary given it is covered by Policy HO8, with it not being clear how provision should be accounted for in Policy HO3.
- 2.2 To ensure Policy HO3 is effective, Part 1. should be amended to provide clarity in the Glossary on, or delete, criterion b., and delete criterion k.

Policies HO4 and HO5: Affordable Housing Requirements and Delivery

Q61 Are the provisions of Policy HO4 in terms of affordable housing requirements justified by the evidence and deliverable?

- 2.3 Policy HO4 is not justified, and the Consortium deems it is unsound for the reasons set out in this response.

- 2.4 The National Planning Policy Framework (NPPF, December 2024)¹ and National Planning Practice Guidance (NPPG)² require that both infrastructure provision and affordable housing needs must be taken account of when setting policy requirements in Local Plans, notably for affordable housing. The policy requirements must allow for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage.
- 2.5 It follows that it is not appropriate or justified to set policies within a Local Plan that are not deliverable and where the underpinning evidence demonstrates that it would be necessary to revert to viability at decision taking stage.
- 2.6 The Consortium do support the Council's suggested modification to include text in Paragraph 9.35 of the Local Plan to confirm that the Sustainable Communities sites are considered as part of the Telford built-up area for the purposes of Policy HO4. However, the minimum 25% affordable housing requirement within the Telford built-up area set out in Policy HO4 1. a. is not supported by the Council's viability evidence.
- 2.7 The Council's own evidence recommends that a target affordable housing threshold of 20% in the Telford built-up area is appropriate. The Regulation 19 Viability Note (VS02, December 2024) is clear at Paragraph 5.32 that the 2023 Whole Plan Viability Assessment recommends 20% affordable housing in and adjacent to Telford, but despite this a 25% requirement is being pursued by the Council in Policy HO4.
- 2.8 The Affordable Housing Topic Paper (TP07, September 2025) suggests that given there is a high need for affordable rented accommodation, and also given the Council's track record of a blended approach of Homes England grant along with Section 106 Agreements being used to secure the delivery of affordable housing, a requirement for 25% in the Telford built-up area is justified.
- 2.9 Whilst grant funding from Homes England could potentially support delivery of affordable housing in the area throughout the Plan period, grant funding is not available on affordable housing secured through Section 106 agreements. In

¹ Paragraphs 32, 35, 36, 58 and 59 of the NPPF.

² Viability Paragraph: 002 Reference ID: 10-002-20251216, and Plan-Making Paragraph: 039 Reference ID: 61-039-20190315

addition, whilst the Affordable Housing Topic paper sets out the number of Affordable Homes that have been delivered within Telford historically, there is no correlation between historic trends and possible future levels of funding that may be applied for and secured.

- 2.10 Whilst Part 4 of Policy HO4 allows for the policy requirements not to be met if justified through a viability assessment, the starting point being higher than what has been demonstrated by the Council's evidence base to be viable is inappropriate and will inevitably lead to planning applications having to seek to deliver a lower requirement than set out in the Policy. This is unhelpful not only for Applicants but also for Members and the general public who may misconceive that the development proposal is seeking to underdeliver on affordable housing compared with the Policy requirement, when in reality that requirement was not viably achievable from the outset based on the Council's own evidence.
- 2.11 To address this, the affordable housing requirement within the Telford built-up area set out in Policy HO4 1. a. should be reduced and viability evidence updated by the Council to demonstrate a figure that can be justified. The requirement should be based on the Council's viability evidence, which the Wappenshall Consortium have raised wider concerns with in response to Matter 5, Issue 2 (Question 51).

Policy HO11: Self and Custom Housebuilding

Q65 Is Policy HO11 justified and supported by the evidence in its approach to self-build and custom housebuilding?

- 2.12 Policy HO11 is not justified or supported by the evidence.
- 2.13 There is no evidence to demonstrate a requirement of at least 5% of plots on housing schemes of at least 100 dwellings to be provided for self-build or custom housebuilding serviced plots.
- 2.14 This would equate to over 150 plots at the Wappenshall Sustainable Community (SC3) alone, and when replicated across other allocations and residential schemes of at least 100 dwellings, this would lead to a significant over supply of plots far in excess of any evidence of need.
- 2.15 The Council have suggested a modification to reduce the requirement from 5% to

3%, however the Consortium consider that this is still unduly onerous and remains unevidenced.

- 2.16 In any case, it is considered unlikely that plots on larger residential schemes are going to be desirable to those with an aspiration to carry out a self-build or custom housebuilding project. Further, there are practical issues relating to the delivery of plots on larger housing schemes such as working practices and delivery of materials which require consideration, along with the potential for impact on development viability.
- 2.17 Policy HO11 2. should be amended to state that developments over 100 dwellings should provide self-build or custom housebuilding plots having regard to the evidence of need in the area of the Site at the time of determination of the application.

Issue 3: Whether the climate change (CC) policies are justified, effective, and consistent with national policy.

Policy CC1: Sustainable Construction and Carbon Reduction

Q90 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?

- 2.18 Policy CC1 seeks to require development to exceed the requirements of Building Regulations, which is contrary to Paragraph 164 b) of the NPPF. This is with particular reference to Part 2 d. of the Policy in relation to materials and Part 3 of the Policy which seeks to require all major developments to aim to achieve net zero carbon emissions. These increased requirements will impact development viability, although it is acknowledged the Council have suggested modifications in relation to Part 2 that these only apply where viable.
- 2.19 Furthermore, Part 1 of Policy CC1 seeks to require development to provide for its energy needs by using on-site or local renewable energy sources. Expecting developments to meet their energy needs on site is unrealistic and overly onerous, with no evidence provided as to the implications for on-site capacity and viability.

Further, requiring energy needs to be met using local renewable energy sources is again unrealistic as energy will be supplied from the grid which will draw on a range of energy sources. The Council's suggested modification deleting the second sentence of Part 1 of Policy CC1 is therefore supported by the Consortium.

Policy CC2: Renewable Energy in Development

Q91 Is Part 1 justified and realistic for all development? Is there any unnecessary duplication with Policy CC1?

Q92 Are the policy's other requirements justified and effective, and do they include sufficient flexibility to be deliverable?

- 2.20 Policy CC2 is not justified, effective or consistent with national policy.
- 2.21 The requirement in Part 1 of Policy CC2 for all new development to incorporate renewable energy production and storage onsite unless existing local renewable energy sources are available and achievable to provide power to the site may not be achievable or desirable. Delivery of renewable energy production and storage onsite will have implications on the land available for development and infrastructure, and therefore viability of development, in particular on allocated sites such as the Wappenshall Sustainable Community (SC3). .
- 2.22 Furthermore, the practicalities of seeking to secure a local renewable energy source which is available and achievable to provide power to the site, where renewable energy production and onsite storage isn't being provided, is likely to impact on the delivery of development and viability. In addition, there is no evidence that such energy sources currently exist or will exist when required for the development.
- 2.23 The Council have suggested a modification to Part 1 of Policy CC2, which is supported by the Consortium in principle, but should be clearer in identifying the Sustainable Communities as exempt from this requirement.
- 2.24 Additionally, the requirement at Part 4 of Policy CC2 for all major development to demonstrate it has selected the most sustainable heating and cooling system is ambiguous and onerous, with no evidence provided as to the effects on site

capacity or viability.

- 2.25 Further, the hierarchies set out in Parts 5 and 6 of Policy CC2 do not allow for consideration of feasibility and viability as required by Paragraph 166 of the NPPF. Whilst the Council have suggested a modification to include additional wording at Paragraph 6.21 of the Local Plan in this regard, this should be embedded within Policy CC2.

Issue 4: Whether the natural environment (NE) policies are justified, effective, and consistent with national policy.

Policy NE3: Biodiversity Net Gain (BNG)

Q102 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?

- 2.26 The aspiration for 20% Biodiversity Net Gain, and the requirement to demonstrate it, is not viable on major developments. Accordingly, Policy NE3 is not justified.
- 2.27 The Council's Natural Environment Topic Paper (TP04, September 2025) suggests that generally Biodiversity Net Gain costs are low, and the increase required to achieve 20% Biodiversity Net Gain instead of 10% is negligible. This is incorrect. For some development proposals, particularly on small sites where it is more difficult to achieve 10% gain on-site and where the baseline position is high as a result of the methodology which sits behind the Biodiversity Net Gain Metric, the cost of achieving 10% Biodiversity Net Gain on-site or through the purchase of off-site credits, which can cost upwards of £30,000 per unit, can be significant and have a substantial impact on development viability.
- 2.28 Part 1 of Policy NE3 should be amended to remove the aspiration for 20% BNG, and the policy should replicate the legally required minimum 10% gain.

Policy NE4: Development Greening Factor (DGF)

Q104 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?

- 2.29 The Policy lacks clarity in how the Greening Factor should be calculated. This lack of precision is unhelpful because without knowing precisely what will be required it is not possible to know whether it is deliverable. The current position holds out a high risk of creating confusion and adding delay at the planning application stage.
- 2.30 The Council have made a suggested modification to Policy NE4, however this does add more uncertainty with regard to the expectations of the Greening Factor, suggesting it should be appropriate to the Site and thus not necessarily a minimum of 0.4 as Part 2 of Policy NE4 requires. The Consortium consider further clarity is required to ensure the Policy is deliverable and can be applied effectively, namely the inclusion of guidance as to how the Greening factor will be applied within the supporting text

Issue 5: Whether the development design (DD) policies are effective and consistent with national policy.

Policy DD2: Housing Development Design

Q115 Is it clear how the policy will be applied to housing allocations and Sustainable Communities, given the design requirements for those sites/locations in policies HO1 and HO2?

- 2.31 The Consortium support the Council's suggested modification to Policy DD2 which seeks to identify that the requirement for Design Briefs for the Sustainable Communities is set out in Policy HO2. Further, the proposed definition of Design Brief suggested as a modification to the Local Plan Glossary by the Council is supported.

Issue 6: Whether the policies for sustainable transport (ST) and transport networks are justified, effective, and consistent with national policy and guidance.

Policy ST1: Sustainable Travel

Q121 Is the meaning of the phrases “accrued by the development” in Part 1d, and “Where a development is served by one of the borough’s rail and bus stations” in Part 2, clear and unambiguous?

- 2.32 Part 2 of Policy ST1 does not provide sufficient clarity on what would constitute a development served by a rail and bus station, and thus when development would be expected to contribute towards relevant enhancements.
- 2.33 The Council have suggested a modification to Part 2 of Policy ST1 to replace “is served by” with “is in close proximity to”, however this is still not clear and unambiguous.
- 2.34 In any case, it is not evidenced why development which is served by a rail or bus station, however that is defined, should be required to make such contributions to make the development acceptable. Proximity does not in and of itself mean that all of the tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 are met. This has also not been taken into account in the Council’s viability assessment supporting the Local Plan.
- 2.35 Part 2 of Policy ST1 should therefore be deleted.

Issue 9: Whether the policies for minerals and land (ML) are positively prepared, justified, effective, and consistent with national policy.

Policy ML1: Mineral Safeguarding

Q145 Are allocated sites and land allocated as SCs included within the MSA and therefore subject to the requirements of Part 1 of the policy? Is this clear in the wording of the policy (and on the Policies Map)?

- 2.36 Part 1 of Policy ML1 does not exclude allocated sites including the Sustainable

Communities from the safeguards it seeks to impose.

- 2.37 To that end, Policy ML1 is too restrictive for allocated sites which are impacted by the Mineral Safeguarded Area as it would require demonstration that the overriding need for the development outweighs the need to safeguard the mineral resource on sites allocated and relied upon by the Council to deliver the growth requirements set out in the Local Plan. Clearly the overriding need for the development is established through the Local Plan.
- 2.38 To that end, the Consortium support the Council's suggested modification to add criterion f. to Part 1 of Policy ML1, which identifies sites which have been allocated for development in the Local Plan as an exception to the protections sought by the Policy.

23rd January 2026

