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COMMERCIAL PROPERTY ADVICE



TELFORD AND WREKIN LOCAL PLAN HEARING STATEMENT MATTER 6, ISSUE 4

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 4

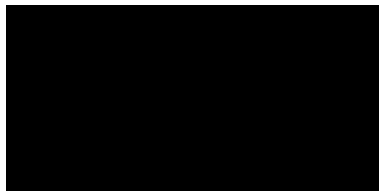
LAND AT BRATTON, TELFORD

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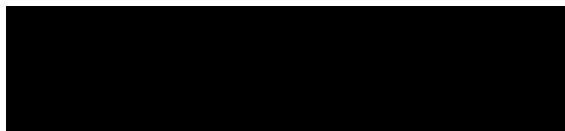


Print Name: John Pearce

Date: 21st January 2026

Approved By

Signature



Print Name: Simon Hawley

Date: 21st January 2026

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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 4.
- 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 4: Whether the Natural Environment (NE) policies are justified, effective and consistent with national policy.

Question 98 – No comment

Question 99 – No comment

Question 100 – No comment

Question 101 – No comment

Question 102 – Is the aspiration of 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?

- 2.1 DWH objects strongly to this aspiration. The aspiration is not justified. The Environment Act sets out the statutory duty to achieve 10% Biodiversity Net Gain (BNG) as part of new development proposals. Furthermore, the requirement in the Environment Act is to achieve a “10% net gain” not “in excess of a 10% net gain”. It does not require or suggest that development should aspire to achieving a 20% net gain. The policy should be re-worded to refer to achieving a 10% net gain.
- 2.2 For most developments the requirement would cause a loss of land available to housing or would require BNG to be achieved off-site, a cost that is not supported by national policy and which will affect project viability. In some cases it may be possible to achieve more than 10% BNG at a site and if the Council wish to support developers that aspire to exceed the statutory 10% requirement wording to this effect should be included in the supporting text to the policy rather than in the policy itself.

- 2.3 As the policy is drafted it is not clear what the requirements are for developers in terms of their obligations to achieve BNG. Clarifying that a 10% net gain must be achieved would align the policy with the statutory requirement in the Environment Act.
- 2.4 Furthermore, if the policy were to remain as currently drafted it would reduce the amount of land available to accommodate the proposed housing requirement as a larger proportion of sites would be undevelopable as they would be needed for BNG. If that were the case either the housing requirement would go unmet or the Council would need to allocate additional land for development.
- 2.5 Any reduction in the total number of dwellings coming forward on allocated sites will result in a reduction in the number of affordable homes being delivered. Similarly, less development would result in reduced developer contributions to fund new infrastructure. Any shortfalls would need to be funded through alternative means that may not be available. The result being that critical infrastructure required to support new development may not be fully funded and may not be delivered.

Question 103 – Are Parts 2, 4 and 6 justified, effective and consistent with national legislation, policy and guidance?

- 2.6 It is not clear what Part 2, Footnote 13 refers to. Only a paragraph number is provided but no reference to an actual document.
- 2.7 DWH objected in its Regulation 19 representations to the requirement to submit a Biodiversity Net Gain Plan with planning applications. Recent experience is that the need to submit a Biodiversity Net Gain Plan is now a matter dealt with by the application of a suitably worded planning condition attached to a planning permission rather than a requirement to accompany a planning application. The policy could usefully be updated to reflect this.

- 2.8 In respect of Part 6, if the Council expects any offsite provision to be provided within the Borough developers could reasonably expect suitable sites to be available to use. Developers could only use registered sites. If they are not available, developers have little option other than to turn to the market to buy BNG units for an out of borough provider. If this option is not available it could result in developments failing to meet BNG requirements.
- 2.9 Similarly, the choice of the alternative location will be down to what sites and BNG units are available to purchase. These will not always be within the Borough although one would hope that over the fullness of time the range and choice of suitable sites would become more prevalent thereby ensuring that Biodiversity Net Gain can be provided closer to source. However, the availability of potential sites is not within a developer's control and is dependent on third party providers having sites available.
- 2.10 It should be noted that due to the BNG mechanism in place by which the further from the site that BNG unit are procured the greater the number of units will be required. Therefore the preference will always be to secure the required BNG on site, then, if this is not possible, within the authority in which the site is located and only then outside the jurisdiction of the authority in which the consent development is located.

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?

- 2.11 The Development Greening Factor (DGF) is a tool that measures the quality and quantity of green infrastructure in development. This is different from Biodiversity Net Gain (BNG) that quantifies the value of biodiversity within a specific area. The DGF essentially requires a proportion of the site to the green infrastructure (non-developed) whilst BNG is a quantitative assessment of the biodiversity that is present within a set area on site. As such, it is considered that the two are measuring different matters. Within the area identified under DGF this could feasibly also be used for BNG.

- 2.12 Notwithstanding the above DWH objected to the Council's choice of a 0.4 greening factor. Whilst this was the figure concluded within the Telford and Wrekin Green Space Factor Study (NC01) it is not clear or justified why a lower or higher figure was not chosen. Similarly, DWH have queried whether the requirement has been adequately viability tested as any requirement to incorporate a large proportion of green space on site could have viability implications for development.
- 2.13 If a proposed greening factor is to be included in the Plan it must be demonstrated it is appropriate and will not adversely impact on viability of development. The incorporation of a greening factor could have an impact on the delivery and viability of commercial development if it seeks an element of the site to remain undeveloped/green, which would impact on scheme viability as well as potentially resulting in the need to identify additional sites for development.

Question 105 – How is delivery of the DGF expected to work alongside policies NE1 to NE3, CI3 and CC5.2? Is this clear enough for the plan to be effective?

- 2.14 In demonstrating and achieving a DGF of 0.4 (if that is the preferred target) there will be a degree of crossover if development proposals have to achieve this with other policies in the Plan. This has the potential to confuse or conflate matters through duplicating the requirements of other policies in the Plan. By providing BNG on site for example there would be a contribution to the greening factor as the area used for BNG would remain undeveloped (or green). The policy could usefully be expressed as achieving a percentage of green infrastructure or area or land across the site, which would hopefully simplify the process and ensure that both policy objectives are met. A target of 40% Green Infrastructure for example could be used that would help achieve the same objective whilst also ensuring space is available for BNG.

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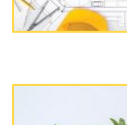
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