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Moving Development Forward

- HEARING STATEMENT -

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EXAMINATION IN PUBLIC OF THE DRAFT TELFORD & WREKIN,

LOCAL PLAN REVIEW (SUBMISSION VERSION)

MATTER 6, ISSUE 6 (SUSTAINABLE TRAVEL, POLICIES ST1 - ST5)

ON BEHALF OF : F. WALLACE & J.TEMPLETON AND

MONTAGUE LAND (MIDLANDS) LTD

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STATEMENT 4 OF 4 - MATTER 6, ISSUE 6 (SUSTAINABLE TRAVEL, POLICIES ST1 - ST5)

- 4.1. The following section engages with the draft policies relating to sustainable travel given nomenclature ST1 through to ST5 found in Chapter 11 of the Submission Version. We do not oppose promoting sustainable public transport, where appropriate, as the main method of travel and aiming to reduce carbon emissions. However, we are concerned that the draft policies are not justified, positively prepared and consistent with national policy insofar as they relate to new development in the Rural Area and some other key problems.
- 4.2. In order to resolve these flaws, we recommend that reference to the rural area is omitted from Criterion 1 of the policy (so that it doesn't apply beyond the urban areas), as follows:

Sustainable travel

1. The council will require, where viable, major development in the urban areas of Telford and Newport ~~and, on a case by case basis in rural areas, to:~~

Question (general): Policy ST1 - Do you oppose or support the policy? Do you have any concerns about its impacts on the development proposals?

- 4.3. We do not oppose the policy in principle. However, certain aspects of the policy wording can be improved. Our areas of concern relate to area wide travel plans as per Criterion 1 a).
- 4.4. Area wide travel plans within main urban areas may be appropriate. However, in the rural area, Sites often come forward as windfall and/or a combination of smaller Sites such as farmstead redevelopments. Area wide plans cannot anticipate this 'ad hoc' delivery.
- 4.5. In these rural and urban fringe locations, such travel plans are unlikely to be deliverable owing to the lack of a responsible party to fund, co-ordinate, deliver and monitor the Plan. Consequently, the inclusion of this wording would not be *effective* nor *justified* and risks adding an extra layer of complexity and delay to rural Sites that are often deliverable quickly.

ID04 Question 120: In part 1c: (a) is the meaning of "dementia-friendly design" clear?

- 4.6. Criterion 1 c). Whilst in theory a laudable inclusion, a requirement *to "use of Dementia friendly design principles"* introduces uncertainty into the policy. The term is not defined and the 'friendliness' of a design is inherently subjective and risks ignoring the needs of other user groups. Examples given such as step-free access and circular walking routes may not be deliverable, given that they are highly dependent upon site topography and layout.

STATEMENT 4 OF 4 - MATTER 6, ISSUE 6 (SUSTAINABLE TRAVEL, POLICIES ST1 - ST5)

- 4.7. The exceptional situations where this may be an appropriate requirement is where the proposal is for the construction of Specialist Homes under policy HO6, such as:
- Age restricted dwellings, retirement communities and developments within Use Class C2A such as residential care homes and hospitals; or,
 - Learning and non-residential institutions falling within Use Class F1, most particularly F1(d) Public libraries or public reading rooms; F1(e) Public halls or exhibition halls; and F1(d) Public worship or religious instruction (or in connection with such use)
- 4.8. Otherwise, with the exception of those such instances, a proposal that complies with relevant recommendations in well-established documents such as DMRB and/or Manual for Streets (as applicable) should be approved without delay.

ID04 Question 118: Sustainability improvements for walking, cycling and bus services:

- 4.9. Criterion 1 d): Requires applicants to demonstrate *“that they have made all reasonable efforts to secure public transport services which will be conveniently routed for new residents and visitors without detrimentally affecting existing users”*.
- 4.10. Criterion 1e): requires applicants to *“demonstrate, on a case by case basis, where it is not practical or viable to serve a site by conventional (bus) public transport services that a package of sustainable travel measures can be delivered offering residents travel choice and an alternative to the use of the car.”*
- 4.11. We are concerned about this because the draft policies impose a *very high* threshold (higher than national policy) for Sites in the rural area and urban fringe by requiring applicants to attempt to seek out, negotiate and ‘test’ public transport providers on altering their existing provision. Taking bus routes as an example, this might include investigating funding for new routes or route alterations, creating the risk of significant costs and delays. This could potentially have untested impacts on viability and speed of delivery of these sites
- 4.12. In the rural area and urban fringe locations, it is not automatically expected that all new homes will be served by public transport. National policy is clear in paragraph 110 that *“sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”* And there is no justification to propose a more stringent wording that goes further than this.

STATEMENT 4 OF 4 - MATTER 6, ISSUE 6 (SUSTAINABLE TRAVEL, POLICIES ST1 - ST5)

- 4.13. The focus should instead be on directing large scale development to locations that are already, or can be made sustainable in future, limiting the need to travel for greater numbers of people and offering a genuine choice of transport modes. In the rural area, this should include approving permission for sites that are located in *sufficiently* sustainable locations which are appropriately close-by to relevant amenities, shops and services and where walking and cycling are reasonable alternatives. For planning proposals in the rural area, where some journeys that cannot be undertaken by more sustainable means than private transport - decisions should support applications that minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.
- 4.14. Criterion 2 a). Additionally, in relation to Criterion 2 relating to rail and bus station. This requires contributions toward enhanced cycle parking etc. The term “close proximity” is not defined and is therefore uncertain. This term should be clearly defined by reference to cyclable distances, for example “within 5km” so that applicants know what to expect.
- 4.15. Moreover, it is highly unlikely that application sites located in the rural area will be in sufficiently close proximity, and/or be delivering development of a high enough quantum that it will genuinely result in a noticeable increase in loading on the existing infrastructure at these stations. As such, contributions from these Sites is unlikely to be necessary to make the development acceptable and the financial impacts on viability are untested. Removing the burden of this policy from applications in the Rural Area is an appropriate response.
- 4.16. In our opinion, without these amendments, the draft policy would not be *justified* or *effective*.

ID04 Question 127: Policy ST5 - Are the requirements for EV charging infrastructure soundly based given the relevant provisions in Building Regulations? :

- 4.17. UK Building Regulations Approved Document S, mandates the installation of EV charging infrastructure for new homes (one charge point per dwelling with parking). This includes a minimum specification for Minimum 7kW output, universal (Type-2) socket, status indicator (lights/LEDs), Mode 3 charging or equivalent.
- 4.18. In light of the requirements in the Building Regs, we do not believe that a duplication of this in the local plan is necessary. National policy discourages such duplication and we consider that it should be omitted.

STATEMENT 4 OF 4 - MATTER 6, ISSUE 6 (SUSTAINABLE TRAVEL, POLICIES ST1 - ST5)

ID04 Questions 126 - 128: Policy ST5 - Do you oppose or support the policy? Do you have any concerns about its impacts on the development proposals?

- 4.19. Policy ST5 requires, amongst other things, under Criterion 4 e), that housing site layouts must provide an appropriate balance of allocated and communal parking provision in residential developments. No guidance is included as to what this means in terms of quantum and it is assumed this will be judged on a case-by-case basis.
- 4.20. In principle, there are no overwhelming concerns about the draft policy objectives. It is commonplace for LPAs to have minimum parking standard for residential development *other than in town centres*. However, the level of parking spaces required should be proportionate and in the form of a 'recommendation' rather than being mandatory. Whilst minimising kerbside parking contributes to positive place making, it will not always be the case that full provision of on-site parking can be achieved.
- 4.21. In town centres served by nearby public car parks, zero on-site parking provision may be appropriate. Where a development is immediately adjacent to an existing highway, this too may have the potential to accommodate a limited amount of the required unallocated on-street parking. However, applicants should be encouraged to demonstrate suitable highway design and capacity within or adjacent to the site.
- 4.22. As the Inspectors have identified, some additional guidance on this topic through the adoption of an SPD would be beneficial. E.g.:

Residential parking outside of town centres:

| Dwelling type | Recommended minimum number of parking spaces required per dwelling |
|--------------------------------|--|
| 1 bedroom flats / apartments | 1 allocated space + 0.4 visitor spaces |
| 1 bedroom houses / 2 bed flats | |
| 2 bedroom houses | 2 allocated spaces + 0.3 visitor spaces |
| 3 bedroom houses / 3 bed flat | 2 allocated space + 0.5 visitor spaces |
| 4+ bedroom houses | 3 allocated spaces + 1 visitor spaces (or 4 allocated spaces) |

STATEMENT 4 OF 4 - MATTER 6, ISSUE 6 (SUSTAINABLE TRAVEL, POLICIES ST1 - ST5)

Allocated spaces are those that are dedicated to drivers from a particular unit or dwelling – and often sold as part of the dwelling. Allocated residential parking requirements should always be provided off-street. Garages can be included in the calculations providing that the garage is of minimum size 6m x 3m or equivalent in order to allow residential parking alongside the storage of household paraphernalia.

Unallocated spaces can be provided in communal parking areas and are to be available for all. Different drivers/visitors can utilise each space through the course of a day.

Where a calculation result is not a whole number, the number of parking spaces provided should be rounded up to the nearest whole number.

- 4.23. Where development sites are constrained to the extent that they cannot sensibly comply with the recommended parking standards, whilst simultaneously delivering a site layout that demonstrates an effective use of land, this is something that should be addressed as part of the planning balancing exercise and consideration of road safety issues.