

Telford & Wrekin Council Local Plan 2021 – 2041

December 2025

EMPLOYMENT LAND DELIVERY TOPIC PAPER



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0.0 NOTE ON TOPIC PAPER UPDATE (DECEMBER 2025)

- 0.1 This Employment Land Delivery Topic Paper updates the version published in September 2025 and has been prepared to support the examination of the submitted Local Plan. The update incorporates more recent employment land monitoring information, including employment land completions, extant planning permissions and remaining employment land supply, using the most up-to-date data available to the Council up to the 2024/25 monitoring year.
- 0.2 The paper has been updated to clarify the calculation of residual employment land need, taking account of completions recorded since the start of the plan period, and to ensure consistency with the various sources of employment land supply, including existing planning permissions, 'carried forward' allocations, and new allocations including those within Strategic Employment Areas and Sustainable Communities.
- 0.3 In addition, the Topic Paper has been updated to respond directly to the Inspectors' Initial and Further Initial Questions relating to employment land. This includes clarification of the quantum of employment land delivered in the early years of the plan period, evidence of extant planning permissions and their contribution to supply, reconciliation of employment allocations carried forward from the adopted Local Plan, an explanation of changes to the extent of Strategic Employment Areas, and a summary of the rationale for the spatial approach to new employment allocations, including land within Sustainable Communities.
- 0.4 The updates are limited to factual clarification and the incorporation of updated monitoring information. The employment land requirement, forecasting methodology and overall strategic approach set out in the emerging Local Plan remain unchanged.

1.0 INTRODUCTION

- 1.1 The purpose of this topic paper is to explain the Council's position in relation to the identified need for employment land, the committed supply of employment land and new allocations coming through via the Local Plan review.
- 1.2 The paper also explains the link between the amount of employment land proposed to be delivered and the Council's housing requirements, in order to demonstrate that there is sufficient housing and workforce population to support future jobs growth.
- 1.3 The Council's employment land requirement is set out in Policy Strategic S3 which sets out the strategy for delivering new employment land for the borough over the plan period.

Policy Strategic S3

Economic delivery strategy

1. The Council is planning for the delivery of a minimum of 167ha of employment land over the plan period.
2. Employment development will be supported and delivered through:
 - a. The completion of sites with planning permission;
 - b. The allocation of new employment sites as shown on the Policies Map for the uses specified in Appendix B and in accordance with Policy S1;
 - c. Directing development to the Strategic Employment Areas in accordance with Policy EC1;
 - d. Development of suitable sites in the urban area in accordance with policy EC1;
 - e. Development of suitable sites in the rural area in accordance with Policy EC2; and
 - f. The delivery of sites, where identified in Neighbourhood Plans.

- 1.4 The 167ha employment land requirement (rounded up from 166.7ha) for the period 2020-2040 is informed by the Telford and Wrekin Economic and Housing Development Needs Assessment (EHDNA) Part 1 (2020) and the updated Newport Employment Land Needs Study (2023).
- 1.5 This overall requirement is split into the following use classes, as set out in the table below.

Table 1: Employment Land Requirement by Use Class (2020-2040, ha)

Employment Use Class	Employment Land Requirement 2020-2040 (ha)
Class Eg(i) and Eg(ii): offices or the research and development of products or processes	32.3
Class Eg(iii)/B2: industrial processes or general industrial	62.2
Class B8: Storage and distribution	72.2
Total	166.7

1.6 Prior to submission of the Local Plan, the plan period has been amended from 2020-2040 to 2021-2041 (as set out in the schedule of suggested modifications). In order to account for this change, the Growth Forecast which underpins the employment land requirement has been 'rolled forward', as set out in Section 4 below.

1.7 This results in an updated residual employment land requirement of **167.7 ha** for the period 2021-2041.

1.8 The Council's approach to economic development is further detailed in development management Policies EC1, EC2 and EC3. Policy EC1 sets out the approach to employment development in Strategic Employment Areas (SEAs), and to protecting against the loss of existing employment land across the borough. Policy EC2 sets out the approach to Economic Development in the Urban Area, outside of SEAs, in the borough. Policy EC3 sets the context for a more diverse rural economy covering a broad range of uses, not solely the traditional Use Class B employment.

Policy EC1

Employment development in the urban area and SEAs

1. The SEAs, as identified on the Policies Map, will be the primary focus for employment development. The development strategy for proposals in the SEAs is as follows:
 - a. Development proposals for industrial, storage and distribution uses will be supported in SEAs, including existing allocations carried forward;
 - b. Development proposals for sui generis uses associated with B Use Class activity, such as waste management facilities, will be supported in SEAs where they are compatible with neighbouring uses;
 - c. Economic activities including business uses (E(g)(i), E(g)(ii) and E(g)(iii)) will be supported in SEAs where: They support the function of the SEA; and They do not undermine the viability of existing employment uses in close proximity to the site.
 - d. Other uses outside of these criteria will generally not be supported in the SEAs without clear justification to how it would support the function of the SEA.

2. Outside the allocated sites and SEAs, employment development in the urban area will be supported where:
 - a. It is located: In close proximity to a SEA; On an existing established employment site and involves the expansion, intensification or redevelopment of an existing premises or site; or Elsewhere in the urban area, where evidence has been presented that no suitable opportunities exist within or adjacent to strategic employment areas.
 - b. The development maintains and enhances sustainable access such as walking, wheeling and public transport;
 - c. The development is served by appropriate parking provision including for electric vehicles in accordance with Policy ST5;
 - d. It does not have a significantly adverse impact on adjacent uses;
 - e. It provides high quality, diverse landscaping and boundary treatment; and
 - f. In the case of greenfield sites, it is demonstrated that no appropriate previously development land is available in the built up areas of Telford or Newport.

Policy EC2

Economic Development in the Urban Area

1. Outside of SEAs the loss of existing employment land will only be supported where:
 - a. Evidence is submitted that satisfactorily demonstrates that the site is no longer suitable, or viable, for employment uses including the current/last use of the site and alternative employment uses;
 - b. The proposed use would not conflict with neighbouring uses; and
 - c. The sustainability benefits of the proposal clearly outweigh the loss of the employment land.

Policy EC3

Employment in the Rural Area

1. Employment development in the rural area should be directed to:
 - a. The re-use/conversion of redundant buildings; or
 - b. The redevelopment of previously developed land; or
 - c. Sites which would form and enable the expansion/extension of an existing business/employment use.
2. The council will support new employment development in the rural area where:

- a. It is successfully demonstrated that the proposal would benefit from a rural location or it would assist the diversification of the rural economy;
- b. The proposal is supported by an appropriate business case which demonstrates the economic benefits to the local economy;
- c. There is no significant adverse impact on local highway capacity and safety, unless appropriate mitigation measures can be implemented; and
- d. It would not have a detrimental impact on the character and quality of the rural area and nearby uses.

3. Where a site/proposal does not meet any of the circumstances in point 1, and is for a new building on greenfield land, well-designed new development will be supported subject to the meeting the criteria at part 2 of this policy and the use, design and scale of the development is responsive to local context.

4. Development which would assist in the retention and/or development of accessible local services and community facilities would be supported where in accordance with Policy CI1.

1.9 This topic paper commences with a review of national policy and guidance, followed by an overview of the Council's employment land evidence, the employment land requirement (including the updated position to reflect the amended plan period to 2041), a summary of the employment land supply that will be delivered through the Local Plan, and an overview of the link between jobs growth and housing land supply.

1.10 The emerging Telford & Wrekin Local Plan has been prepared and will be examined under the National Planning Policy Framework (NPPF) published in December 2024.

1.11 This topic paper has been written to support the submission of the Local Plan for examination and relates to the Regulation 19 version of emerging Local Plan.

1.12 The main evidence base documents discussed in this paper are the Part One Economic and Housing Development Needs Assessment (EHDNA) (October 2020) (EH03) and the updated Newport Employment Land Needs Study (2023) (EH06).

1.13 These documents provide recently prepared, comprehensive and robust evidence sources that are drawn on at various points throughout the paper.

2.0 NATIONAL PLANNING POLICY

2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The original NPPF was published in 2012 and has been most recently revised in December 2024.

2.2 The overarching purpose of the NPPF and the planning system itself is to encourage sustainable development. The policies set out in the NPPF set out the Government's position on what sustainable development means in practice including the three core dimensions to achieve this.

2.3 One of the core dimensions is an economic objective to "*help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure*".

2.4 Paragraphs 85 to 89 of the NPPF set out how the Government is committed to supporting the economy stating that "*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*".

2.5 Policies set out within Local Plans should:

- a) *"set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to the national industrial strategy and any relevant Local Industrial Strategies and other local policies for economic development and regeneration;*
- b) *set criteria, and identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- c) *pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics;*
- d) *seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
- e) *be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances".*

2.6 Paragraph 127 of the NPPF sets out how planning policies and decisions should reflect changes in the demand for land. This requires regular reviews of both the land allocated for development and of land availability.

2.7 Planning Practice Guidance (PPG) regarding 'Housing and economic needs assessment' was published by the government in March 2015 and last updated in December 2024.

2.8 The guidance explains how LPAs can determine the type of employment land needed in their area by producing a robust assessment of the needs of existing businesses. National economic trends will be used to understand future needs, however the PPG notes that these national trends may not translate to all areas, due to local distinctions in the employment base. To understand, prepare, and maintain evidence around both current and future business requirements, the PPG outlines the process that LPAs ought to undertake:

- Consider the best fit functional economic market area (FEMA)
- Assess the quality and quantity of the existing employment land

- Consider recent trends in employment supply
- Liaising with the business community to understand market demand
- Taking account of the Local Industrial Strategy
- Assess wider market signals relating to economic growth
- Assess reasons behind market failure

2.9 As set out in the PPG, policy makers should use a range of data when considering employment need including:

- Sectoral and employment forecasts and projections (labour demand)
- Demographically derived assessments of future employment needs (labour supply techniques)
- Analysis of past employment land take-up and/or future property market requirements
- Consultation with relevant organisations and review of relevant studies to understand business trends and changing business models

2.10 As also highlighted in the PPG it is important to consider whether there are specific requirements in the local market which affect the types of land or premises needed. Consideration of clustering certain industries can be beneficial to encourage collaboration, productivity and innovation as well as in driving the economic prospects of that area.

3.0 EMPLOYMENT LAND EVIDENCE

3.1 The evidence to support the employment land requirement and policies contained within the Local Plan is primarily set out in the Telford & Wrekin Economic and Housing Development Needs Assessment (EHDNA) Part One (October 2020) (EH03) and the Newport Employment Land Needs Study (October 2024) (EH06).

Telford & Wrekin Economic and Housing Development Needs Assessment (EHDNA) Part One (2020) (EH03)

3.2 The evidence presented in the EHDNA Part One (2020) concludes that Telford & Wrekin can be defined as a standalone Functional Economic Market Area (FEMA).

3.3 Telford & Wrekin is identified as having a diverse economy with sectoral strengths in Advanced Manufacturing and Engineering, Defence and Security, Environmental Technology, and Food Manufacturing and Processing.

3.4 The economic growth prospects for Telford & Wrekin were considered through a range of sources; econometric forecasts, growth strategies and stakeholder engagement. The impacts of the Covid-19 pandemic and Brexit were also considered, together with trends in working from home which are likely to continue over the plan period.

3.5 A range of future jobs growth scenarios (including labour demand and completions trend scenarios) were considered and these figures translated into different levels of employment land required over the plan period ranging between 167ha (labour demand scenario) and 189ha (completions trend scenario including the 84,000 sqm floorspace delivered at MOD Donnington in 2016/17).

3.6 The locally-derived Growth Forecast is the scenario that ultimately formed the basis of the employment land requirement set out in the Regulation 19 Local Plan. This scenario was considered to be more realistic than the completions trend scenarios as it included provision for increased levels of homeworking in future.

3.7 This scenario was based on the Experian baseline forecast but applied adjustments to a number of sectors to reflect evidence of market demand and signals, and growth sectors identified in the Local Industrial Strategy of the former Marches Local Enterprise Partnership (LEP). The growth sectors to which adjustments were applied include advanced manufacturing and engineering, and food manufacturing and processing.

3.8 The Growth Forecast identified a growth of 17,100 net additional jobs over the plan period 2020-40, representing an annual growth of 853 jobs.

3.9 A labour demand approach was then used to calculate the amount of employment land needed to support the level of projected employment growth. This approach applied a series of stages including:

- Estimating the full time equivalent (FTE) jobs related to the total jobs growth. This is calculated for each sector based on the ratio of full-time and part-time employment jobs.
- Disaggregating the proportion of jobs growth in each sector by the type of employment (B Class) use class and non-employment use classes. This is based on the existing mix of jobs in each sector in Telford & Wrekin.
- Translating this into floorspace by assessing the quantum of floorspace required for each job using employment densities.
- Converting the floorspace requirements to land requirements using a plot ratio, which is the ratio of the size of land required to support the identified quantum of floorspace.

- Converting this to gross development needs. This is done by accounting for the quantum of losses of existing stock which will be expected to be lost over the forecasting period.
- Additional provision is added to account for the need for open storage. This additional provision is based on the past trend completions data.
- Taking account of changing trends in working from home which is based on forecast increases in the number of people working from home in each sector.
- Adding a margin of flexibility to support changing business needs.

3.10 In order to support the jobs growth projected under the Growth Forecast, the labour demand approach calculated a total employment land need for the period 2020-2040 of **166.7 hectares**.

3.11 This EHDNA evidence was published alongside the Regulation 18 Issues & Options consultation (September 2020) which set out two employment land requirement options; the 167ha economic growth option and the 189ha past trends option. The consultation responses received expressed general support for Policy Strategy S3 and highlighted that the plan should reflect the need for a higher number of houses to support economic growth. Comments also included the need for clearer links between spatial strategy, housing and employment allocations in the plan.

3.12 The Council has not received any requests from neighbouring LPAs as part of Duty to Cooperate discussions to contribute towards unmet employment land needs.

3.13 The Growth Forecast included in the Regulation 19 Local Plan has been 'rolled forward' to produce an employment land requirement for the revised plan period of 2021-2041, as set out in Section 4 of this topic paper.

Newport Employment Land Needs Study (2024) (EH06)

3.14 The purpose of this study was to identify an employment land requirement for the Newport sub-area which would be met through strategic policies in the Telford & Wrekin Local Plan.

3.15 This report provides an update to the 'Newport: The Need for Employment Land' study which was undertaken by Peter Brett Associates (PBA) in 2013. It was prepared in the context of the EHDNA Part One (2020).

3.16 Whilst there is no requirement in national policy and guidance to plan for economic development needs on a sub-area basis, Newport plays a significant role in terms of recent delivery and planned future employment growth (including having a current Strategic Employment Area allocation to the south of Newport). Therefore, this study provides evidence to justify the future location and scale of employment land that will be delivered in the Newport sub-area over the Local Plan period.

3.17 This study sets out the characteristics of the current supply of employment land and floorspace in the Newport sub-area, informed by site visits (undertaken in June 2023), desk-based analysis of planning applications and previous employment land studies, and interviews with key local stakeholders including officers at Telford & Wrekin Council, Invest Telford, The former Marches LEP and Harper Adams University.

3.18 The study recommends a **minimum 11.7 hectares** of additional land and floorspace should be identified to support future economic development in or on the edge of Newport. The study recommendations are informed by recent take-up trends as the most robust local indicator of future potential levels of development of land and floorspace.

3.19 The minimum recommendation provides for flexibility and choice, making provision for potential replacement or reconfiguration of the existing portfolio and recognising previous constraints on quantitative and qualitative changes to the stock of land and floorspace.

3.20 The evidence presented in this report supports the allocation of further employment land at Newport which will build on the success of recent developments, including Newport Innovation Park (NI Park) which is focused on the agri-tech industry, and capitalise on its connectivity to the A41 and M54 corridors.

3.21 These allocated employment sites include sites EC2, EC4 and EC5. These sites are all located within the Newport Strategic Employment Area (SEA) and will provide a positive planning position with an estimated **22.1 hectares** of employment land over the plan period, as shown in the table below.

Table 2: Newport Employment Site Allocations

Site Reference	Site Name	Estimated Employment Land (ha)
EC2	Land East of A518	17.53
EC4	Land southeast Newport town centre	2.90
EC5	Land at AGA Rangemaster, Waterloo Road	1.67
Total		22.1

4.0 EMPLOYMENT LAND REQUIREMENT (2021-2041)

4.1 In order to calculate an updated employment land requirement for the revised plan period 2021-2041, the Growth Forecast has been rolled forward by one year to 2041. This has been undertaken by applying the average compound annual growth rate (CAGR) for the past five years to the 2040 jobs forecast for each sectors. This reflects an additional 493 jobs for the year 2040 to 2041.

4.2 This results in a jobs growth forecast for 2041 by sector to which the labour demand modelling stages set out in paragraph 3.9 above have then been applied. The base date is retained as 2020 for the forecast labour demand modelling. The outcomes of the 'rolled forward' land requirement position compared to the 2020-2040 position are shown in the table below.

Table 3: Employment Land Requirement by Use Class (ha)

Employment Use Class	Employment Land Requirement 2020-2040 (ha)	Employment Land Requirement 2020-2041 (ha)
Class Eg(i) and Eg(ii)): offices or the research and development of products or processes	32.3	32.7
Class Eg(iii)/B2: industrial processes or general industrial	62.2	62.7
Class B8: Storage and distribution	72.2	73.6
Total	166.7	169.0

4.3 In terms of measuring total labour demand under the Growth Scenario for the period 2021-2041 this means it is appropriate to present a residual total, net of floorspace completed in 2020/21. As set out in the Council's latest monitoring data there was a net gain of 5,096 sqm¹ delivered over the 2020 to 2021 monitoring period. This is presented in the following table as a hectare equivalent.

¹ This figure differs from that reported in the published Authority Monitoring Report, which identified a net loss of 482 sqm for the 2020 to 2021 period. Subsequent review has identified additional completed development within the monitoring year, and the figures presented in this paper reflect this correction.

Table 4: Employment Land Requirement by Use Class (ha)

Employment Use Class	Class Eg(i) and Eg(ii)): offices or the research and development of products or processes	Class Eg(iii)/B2: industrial processes or general industrial	Class B8: Storage and distribution	Total
Requirement 2020-2041 (ha)	32.7	62.7	73.6	169.0
Completions 2020-2021 (ha)	-0.21	0.52	0.96	1.27
Residual requirement 2021-2041 (ha)	32.91	62.18	72.64	167.73

4.4 Updated forecasts have not been acquired on the basis that the outlook generated through preparation of the Growth Scenario within the EHDNA Part One (2020) (EH03) was reflective of planning positively for economic growth, and the methodologies of the forecasting houses in more current forecasts take account of recent events including increased inflation and the Ukraine-Russia war which generally correspond to downward pressure on prospects for economic growth.

4.5 Taking account of what are potentially short-term constraints upon the global in this economy would be less consistent with planning positively for economic development over the plan period, reinforcing the justification that rolling forward the baseline forecasts and Growth Scenario prepared for the EHDNA 2020 would remain a robust approach.

4.6 Taking into account the above justification for maintaining use of the existing baseline projections, this base-date for the forecast scenario remains an appropriate starting point for monitoring.

5.0 TOTAL AMOUNT OF LAND DELIVERED SINCE THE START OF THE PLAN PERIOD (2021)

5.1 This section responds to the Inspectors' Further Initial Question (a) in relation to employment land, which requests confirmation of “*the total amount of land in hectares delivered from completions for the first four years of the Plan period (as proposed to be amended), namely 2021/22, 2022/23, 2023/24 and 2024/25, supported by monitoring data for those financial years*”.

5.2 The table below sets out employment land completions for each monitoring year, expressed in hectares, and is derived from the Council's employment land monitoring data. The information provides a breakdown of completed employment development and demonstrates the quantum of employment land delivered since the start of the plan period.

Table 5: Employment Land Completions by Monitoring year (Ha)

	2021/22	2022/23	2023/24	2024/25
Class Eg(i) and Eg(ii)	2.70	0.59	0.08	0.07
Class Eg(iii)/B2	2.37	3.20	1.95	2.41
Class B8	5.40	0.91	1.87	2.91
Total	10.46	4.70	3.90	5.40

5.3 In total, **24.45 hectares** of employment land has been completed since 2021/22, the start of the revised plan period. On sites allocated prior to the Plan period, a total of **29.6 hectares** has been delivered.

6.0 EMPLOYMENT LAND SUPPLY

6.1 The employment land supply is made up of extant planning permissions, existing and emerging site allocations (including land within Sustainable Communities) and employment land completions since the start of the plan period.

6.2 The Council's latest employment land monitoring data indicates a total of 24.45ha equivalent completions since the start of the plan period (2021/22-2024/25). These completions have been removed from the total plan period requirement to give a residual employment land need figure of 143.3ha for the period 2025-2041.

6.3 This residual need is set against a total committed supply of 205.7ha. This results in a surplus of 62.5ha, some of which may be delivered beyond the plan period.

6.4 A summary of the components of employment land supply versus the local plan requirement is set out in the table below.

Supply/Demand Balance	Hectares
Employment Land Need	
Total Employment Need 2021-2041	167.7
Completions 2021-2025	24.5
Residual Need 2025-2041	143.3
Components of Supply	
Existing Allocations	58.0
Emerging Allocations	47.0
Sustainable Communities	75.6
Existing Planning Permissions	25.1
Total Supply	205.7
Surplus	62.5

Existing Planning Permissions

6.5 The Inspectors have asked for *“Evidence of existing planning permissions for employment land, with sufficient information to demonstrate the permissions are extant and the quantum of employment land they would deliver if built out.”*

6.6 The Council has reviewed and updated the schedule of employment-related planning permissions. Permissions that have lapsed or been implemented in full have been removed. The remaining permissions are considered extant and capable of delivery, based on their implementation status and the absence of expiry or completion. The schedule reflects permissions that are extant **as at 31st March 2025**.

6.7 Each permission has been assessed to identify the scale of employment development permitted and its contribution to the employment land supply. Floorspace has been converted to a hectare equivalent using a 40% plot ratio, consistent with the approach used elsewhere in the Topic Paper. Where permissions result in a net loss of employment floorspace, this is reflected as a negative figure.

6.8 Table 6 below summarises the extant planning permissions included within the employment land supply, including the permitted use, floorspace, estimated land take and current delivery status.

Table 6: Extant employment land planning permissions

Application Reference	Use class	Floorspace Permitted (sqm)	Ha Equivalent (40% plot ratio)	Status
TWC/2020/0717	B8	1,470.0	0.4	Under Construction
TWC/2022/0230	B1	-14,484.7	-3.6	Under Construction
TWC/2022/0281	B8	413.0	0.1	Under Construction
TWC/2022/0968	E	61.0	0.0	Not Yet Started
TWC/2022/0972	B2/B8/E(g))	586.0	0.1	Not Yet Started
TWC/2023/0074	Sui Generis/B8	-665.0	-0.2	Under Construction
TWC/2023/0079	B2	232.0	0.1	Not Yet Started
TWC/2023/0154	B8	322.6	0.1	Not Yet Started
TWC/2023/0209	B8	477.0	0.1	Not Yet Started
TWC/2023/0550	B2	787.0	0.2	Not Yet Started
TWC/2023/0621	B8	381.0	0.1	Not Yet Started
TWC/2023/0701	B2/B8	11,119.0	2.8	Not Yet Started
TWC/2023/0732	B2, B8 and E(g(iii))	500.0	0.1	Not Yet Started
TWC/2023/0773	Agricultural B1/B2	1,758.3	0.4	Under Construction
TWC/2023/0831	B8	132.4	0.0	Not Yet Started
TWC/2023/0908	B2	1,217.0	0.3	Under Construction
TWC/2024/0011	B8	8,499.0	2.1	Under Construction
TWC/2024/0064	B8	14.7	0.0	Not Yet Started
TWC/2023/0673	B2/B8 and E(g)(iii)	87,700.0	21.9	Not Yet Started
Total		100,520.3	25.1	

6.9 The permissions listed above provide a net contribution of **25.1 hectares** of employment land to the supply, subject to build-out. Their status demonstrates that delivery is either underway or capable of coming forward within the plan period.

Existing Employment Allocations Carried Forward

6.10 The Inspectors have asked “*The difference between the 36.8ha of employment land supply said to come from ‘carried forward’ allocations and the figures provided for the eight sites listed in Appendix E of the Council’s response to ID01, which appear to add up to only 17.4ha.*”

6.11 For clarity, **58.02 hectares** of employment land is carried forward from existing adopted employment allocations. This figure represents the **remaining undeveloped employment land** capable of delivery, net of completions, and is derived from a plot-level assessment of each allocation.

6.12 The employment allocations carried forward to the emerging Local Plan are:

- **E1** 9.27 ha remaining (no recorded completions)
- **E7** 0.86 ha remaining (no recorded completions)
- **E8** 1.39 ha remaining (no recorded completions)
- **E9** 3.32 ha remaining (0.08 ha completed)
- **E10** 4.02 ha remaining (no recorded completions)

- **E13** 1.30 ha remaining (no recorded completions)
- **E14** 2.48 ha remaining (no recorded completions)
- **E16** 2.74 ha remaining (no recorded completions)
- **E17** 3.13 ha remaining (no recorded completions)
- **E19** 16.42 ha remaining (19.15 ha completed)
- **E20** 1.64 ha remaining (no recorded completions)
- **E23** 1.97 ha remaining (no recorded completions)
- **E25** 1.46 ha remaining (no recorded completions)
- **E27** 8.03 ha remaining (1.65 ha completed)

6.13 Several existing employment allocations have been fully built out and are therefore recorded as employment land completions, rather than contributing to the remaining supply.

6.14 Two allocations have been removed from the employment land supply. Allocation E18 is shown as white land in the emerging Local Plan and is no longer allocated for employment purposes. Allocation E28 is now incorporated within Sustainable Community SC3 and is accounted for within the employment land provision associated with that Sustainable Community.

Changes to Strategic Employment Areas

6.15 The Inspectors have also asked “*Whether the extent of land designated as Strategic Employment Areas (SEA) has changed from the current adopted position, and if so how and why.*”

6.16 The extent of land designated as within the Strategic Employment Areas has changed in form and extent. It should be noted that the changes set out below do not impact the employment land supply for the borough. The key changes are (as per the number on the accompanying plan):

1. **Removal of land to the west of Hortonwood estate from the Hortonwood SEA area.** The rationale for the removal of the designation is the presence of a Special Educational Needs School and a solar farm which were covered by SEA designation. The SEND school is in the process of expanding following the grant of planning permission (planning application reference TWC/2024/0119) and in the circumstances, it was not deemed appropriate to maintain an SEA designation over this area.
2. **Merger of Shawbirch employment land into Sustainable Communities site SC3 Land North of A442 Wheat Leasows.** The Council received a request from Homes England (as the land owner) to consider the inclusion of the Shawbirch SEA area within the envelope of the overall Sustainable Community site at Wappenshall. This request was supported as it would allow for the planning of a more comprehensive employment development, including flexibility in the delivery of development plots, connectivity and appropriate landscaping to protect existing residential properties. To maintain flexibility at this stage the Council have set out the minimum amount of employment land the Sustainable Community will need to deliver in policy HO2. The final boundaries of the SEA designation in this Sustainable Community will be set at the planning application stage.
3. **Removal of areas of the Central Telford SEA with the Telford Town Centre boundary.** Under the adopted Local Plan, the SEA designation in this area conflicts with purpose and function of Telford Town Centre as it in theory allows for B use classes within the boundary of Telford Centre. Removal of the designation provides clarity around uses. Consequently, a small amount of land that sat to the west of the Telford Town Centre boundary that was covered by the SEA designation was now remote from

the main b use classes and has therefore been designated white land.

4. **Creation of additional SEA designated areas.** As part of the plan making process additional employment land was put forward for consideration. Where these sites have been taken forward as allocations the SEA designation has been extended to them to provide maximum protection for employment uses.

Spatial Approach to New Employment Allocations

6.17 The Inspectors have also requested a “*brief summary, the rationale for the spatial approach to new employment allocations (including land within Sustainable Communities), with cross-references to other evidence documents where relevant*”

6.18 The rationale for the spatial approach to new employment allocations in the emerging Local Plan has been influenced by a number of factors, which are broadly summarised in the Site Selection Technical Paper (AS01), these include;

- The overall need for new employment land over the plan period;
- The willingness of landowners to bring sites forward for employment uses;
- The proximity of the site to key highways infrastructure;
- Harmonious surrounding uses; and
- The general suitability of the site for employment uses.

6.19 The above factors have helped determine suitable locations for employment within the borough to meet the overall employment land needs set out in the Part One EHDNA (EH03) document and subsequently the revised estimate set out in the Employment Delivery Topic Paper (TP09).

6.20 A significant amount of employment development is currently located to the north and east of Telford. The new employment allocations for Telford will help rebalance employment land provision with locations in the west of Telford. The two key sites are EC1 East of Dawley Road, and the employment land provision contained in the Sustainable Community SC3 Land north of the A442 Wheat Leasows. Both sites are well connected to the principal highway network and the M54 and provide opportunities to deliver employment at scale.

6.21 The employment land provision on sites SC1 and SC2 provides a mix of provision with scope for smaller business parks that can provide local services and employment opportunities to residents helping to make those sites sustainable.

6.22 Newport is a market town to the northeast of Telford and to help guide the level of employment land delivery in the area the Newport Employment Land Study (EH06) was undertaken. This helped to identify appropriate sites in the Newport area that were in line with the factors set out above. The result has seen a consolidated employment area for Newport on the junction of the A518 and the A41 which is an extension of the town’s traditional employment areas.

7.0 LINK BETWEEN JOBS GROWTH AND HOUSING LAND SUPPLY

- 7.1 In order to consider the level of housing required to support the levels of economic growth set out within the economic growth scenario developed within the Part 1 EHDNA (EH03) (equivalent to growth of 859 jobs per annum), scenarios based on demographic trends and household formation rates were used to model the level of population and hence new dwellings that would be required. Within the Part 1 EHDNA (EH03) it was calculated that the jobs generated by the economic growth scenario would be equivalent to a housing requirement of 848 dpa.
- 7.2 An updated assessment of the employment-led growth scenario was set out in section 6 of the Housing Requirement Technical Paper (October 2023) (EH05). In this case, when the re-profiled employment growth scenario (derived from the Part 1 EHDNA) was applied to a 2021 base-date, and taking account of the higher official Census estimate, this produced a lower dwelling equivalent figure of 642 dwellings per annum. However, it was noted that within this context a downward adjustment to either provision for housing or land for economic development would not reflect positive planning.
- 7.3 The test typically applied in assessing the relationship between homes and jobs (though a requirement for providing for these needs in balance is no longer expressly linked in national policy) is that a lack of housing is having a negative effect on opportunities to support economic development or opportunities for people to live near their place of work. This is not the case in Telford & Wrekin.
- 7.4 The amount of employment land being delivered through the Local Plan will therefore be sufficiently supported by the level of housing growth and availability of local labour supply, and reflects the positive economic growth ambition for Telford & Wrekin that is reflected in the local plan and is supported by the evidence on jobs growth forecasts.

8.0 CONCLUSION

- 8.1 The residual employment land requirement for the period 2021-2041 is 167.7ha, which is a marginal increase from the 167ha set out in Policy Strategic S3. A modification to Policy Strategic S3 has been suggested to reflect this change. This requirement will be delivered through Policy EC1, EC2 and EC3. These policies are in accordance with national policy requirements and guidance relating to economic growth. The Council's approach to delivering this employment land requirement is justified and effective.
- 8.2 Given the nature of the FEMA is self-contained, the employment land being delivered through the Local Plan is intended to meet Telford & Wrekin's own employment needs only. The Council has not received any requests from neighbouring LPAs as part of Duty to Cooperate discussions to contribute towards unmet employment land needs elsewhere.
- 8.3 The Council is able to demonstrate a positive position on employment land supply and delivery which is contributing towards the growth and diversification of Telford & Wrekin's economy and is meeting the needs of its own market. This will be sufficiently supported by the proposed level development of housing being planned for through the Local Plan.