

Telford & Wrekin Council – Responses to Matters, Issues and Questions

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Matter 4, Issue 1

Matter 4 – Strategic Policies (other than Housing)

Issue 1: Have the Strategic Policies been positively prepared, do they reflect the priorities and development strategy, are they justified by a robust and credible evidence base, and are they consistent with national policy?

Q34. Are Policy Strategic S1 and Policy Strategic S2 worded clearly enough such that there is no ambiguity or lack of understanding as to what is expected of development proposals?

Policy Strategic S1 and S2 clearly support the vision and priorities of the plan and as such provide a clear strategic direction for development proposals coming forward and what is expected of them. The strategic policies should be read in conjunction with relevant development management policies that provide further detail to shape proposals coming forward. In considering the responses put forward at Regulation 19 stage the Council has suggested a modification to criterion 'e' of the policy S1 in document CD08. The suggestion clarifies that securing '*a net gain in biodiversity and enhanced green infrastructure*' will help address the climate change and biodiversity process.

Q35. Is the employment land figure in Policy Strategic S3 justified by and consistent with evidence of need over the Plan period?

The 167ha employment land requirement (rounded up from 166.7ha) for the period 2020-2040 was informed by the Telford and Wrekin Economic and Housing Development Needs Assessment (EHDNA) Part 1 (2020) (EH03) and the updated Newport Employment Land Needs Study (2023) (EH06).

This figure was then updated to take account of the revised Plan period by 'rolling forward' the Growth Forecast to 2041, as set out in section 4 of the Updated Employment Land Delivery Topic Paper (TW03). This resulted in a revised residual employment land requirement for the 2021-2041 Plan period of 167.7 hectares. This requirement is therefore justified by and consistent with evidence of need over the Plan period.

Q36. (a) Does the Plan identify sufficient land to meet the identified need for employment land? (b) Is the delivery strategy for employment land in Policy Strategy S3 consistent with the evidence on sources of supply? What about employment allocations carried forward from the previous Local Plan and new land in Sustainable Communities?

(a) - As set out in section 6 of the Updated Employment Land Delivery Topic Paper (December 2025) (TW03), 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.

This residual need is set against a total committed supply of 205.7ha which is split across existing and emerging allocations, proposed Sustainable Communities, and sites with extant planning permissions, as follows:

Components of Supply	Hectares
Existing Allocations	58.0
Emerging Allocations	47.0
Sustainable Communities	75.6
Existing Planning Permissions	25.1
Total Supply	205.7
Residual Need 2025-2041	143.3
Surplus	62.5

This results in a surplus of 62.5ha, some of which may be delivered beyond the plan period. The Plan therefore identifies sufficient land to meet the identified need for employment land as well as supply choice to the market.

(b) - Policy Strategic S3 sets out the delivery strategy for employment land, which it clearly states is to be split across sites with existing planning permission and the allocation of new employment sites (as shown on the Policies Map). This is consistent with the sources of supply set out in paragraph 6.2 of the Updated Employment Land Delivery Topic Paper (December 2025) (TW03).

The new employment allocations being brought forward in this Local Plan are listed in Table 8 of the Submission Version Local Plan (TW03) totalling 47ha.

A further 58ha employment land will be delivered on sites carried forward from existing adopted employment allocations. Employment allocations carried forward from the previous Local Plan are included within the reference in paragraph 2(b) of Policy S3 to '*new employment sites as shown on the Policies Map*' and are listed in the Employment Land Delivery Spreadsheet (TW03a) and shown on the Map of Employment Land Supply Telford and Newport (TW04).

75.6ha employment land is also allocated to be brought forward in the three Sustainable Communities, as detailed in Policy HO2.

In addition to allocations and sites with extant permission, employment development will also be supported in Strategic Employment Areas and suitable sites within the urban area (in accordance with Policy EC1) and suitable sites within the rural area (in accordance with Policy EC2). Employment sites may also be brought forward where allocated in Neighbourhood Plans.

Q37. Is the Plan clear enough to be effective about: (a) how the strategy for employment land relates to the overall strategy for growth; and (b) the broad quantum and location of different employment land types to be delivered?

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.

The above factors have helped determine suitable locations for employment within borough to meet the overall employment land needs set out in the Part One EHDNA (EH03) document and subsequently the requirement for the revised plan period (2021-2041) originally set out in the Employment Delivery Topic Paper (TP09).

A significant amount of existing 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 to 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.

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.

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.

The locations of the new employment land allocations, including the Strategic Employment Areas and Sustainable Communities, are shown on the Policies Map. The quantum of employment land to be delivered on each new allocation is set out in Table 8 of the Local Plan and detailed in Policy HO2 for each of the Sustainable Communities.

Q38. Is the Plan soundly based, having regard to Framework paragraph 90 and anticipated needs for retail, leisure and other town centre uses?

Yes, the plan is soundly based, having regard to paragraph 90 of the NPPF and anticipated needs for retail, leisure and other town centre uses. This is evidenced by;

- Policy EC5 establishes a hierarchy of centres for the borough. The extents (in the case of town and district centres) and locations (in the case of local centres) are clearly shown on policies map to help provide clarity to proposals coming forward. The boundaries and PSAs of town and district centres have been reviewed as part of the Local Plan (EH08). In some cases, extended to these have been extended to more accurately reflect concentrations of retail and town centre uses. An additional Local Centre was also identified at Dale End. Policies in the plan including EC6 and EC7 reflect the need to allow for residential development in centres and provides criteria to guide this, whilst protecting the role of centres.
- Protection of markets within Town Centre PSAs including Wellington Market. The market has now been taken into public ownership and is currently subject to a significant refurbishment and regeneration project, demonstrating the Councils commitment to markets as part of a vibrant town centre mix.
- Where sites have been allocated in Telford Town Centre this has been for mixed use. This approach would support a flexibility that could include, for example, active ground floor frontages and residential above.
- Policy EC10 Out of Centre and Edge of Centre Development recognises that in some cases sites might not be available within town and district centres that meet the requirements of applicants. The policy requires the production of sequential tests and Retail Impact Assessments at thresholds for town, district and local centres.
- Allocation of mixed-use sites and approach to residential in Telford Town Centre set out in policy EC6 in document CD01.

The Council has adopted a flexible market driven approach which is broadly consistent with the existing Local Plan, supported by a strong policy framework in the new Plan. This approach is further explained in the Town Centres Topic Paper (TW05).

The Council recognise that town centres play a significant role in the economy as key retail centres, leisure destinations and broader commercial activity. Therefore, it is recognised that Policy S3 could be further strengthened by making direct

reference to supporting the role of town centres as part of the broader economic delivery strategy.

Q39. To be sound, does Policy Strategic S3 need to address other key economic sectors identified in Section 3 of the Plan? What about town centre renewal, tourism and the rural economy for example?

Policy Strategic S3 supports economic development on suitable sites in the urban area in accordance with Policy EC1 (criterion 2) and on suitable sites in the rural area in accordance with Policy EC3 (criterion 2). Therefore, criterion 2 (e) of Policy S3 requires a correction and should refer to Policy EC3.

Policy S3 is therefore considered to be effective and justified as it aligns with these other policies.

Support for Town Centre renewal is provided separately under Policy EC6, EC7 and EC8. Support for tourism related development is provided separately under Policy CI4.

Q40. Is Policy Strategic S5 sufficiently clear how development proposals should mitigate and adapt to climate change and how such proposals will be considered?

Policy Strategic S5 is sufficiently clear on how development proposals should mitigate and adapt to climate change, providing a strategic framework for applicants to work within when bringing forward proposals. The Policy clearly supports the Councils aspiration for a climate neutral borough (Plan priority 1) and sets out the key areas development where development can contribute towards this, further detail is provided within relevant development management policies.

The Council has following Regulation 19 consultation recognised that development has a role in '*contributing to*' net zero as it is recognised that development may not be able to achieve net zero in all cases. Therefore, a suggested modification has been made to reflect this in document CD08.

Q41. Is Policy Strategic S6 sufficiently clear how development proposals should contribute to healthy stronger communities? In particular, is the approach to proposals for hot food takeaways, betting shops and vape shops (criterion f) sufficiently clear and unambiguous and justified by the evidence? What does 'overdominance' mean?

Policy S6 is clear how development proposals should contribute to healthier stronger communities and reflects Plan priority 6. The policy provides a framework for applicants that sets out the key principles in relation to health and wellbeing that can help shape their proposals. Development has a key role to play in improving the health of new and existing residents with the, nationally recognised, benefit of reducing the increasing burden placed on the public sector in terms of health and social care costs through well designed schemes. The Council do, however, recognise that not all the criteria will apply to all potential proposals that could come

forward, for example employment developments, and therefore a modification has been proposed in document CD08 to provide some flexibility for 'relevant' developments.

Criterion f of the policy recognises two issues; 1) there are some uses that, although they can contribute towards a balance of uses in centres, they are also ones which can contribute towards mental and physical health issues, and 2) without any control there is risk these uses can proliferate in centres and undermine their vitality and viability contrary to paragraph 90 of the NPPF. In the case of hot food takeaways (HFTs), vape shops and betting shops it is widely recognised that they can have a significant disbenefit to public health, contributing to poor mental and physical health.

Uncontrolled distribution of these uses within town centres would lead to issues such as dead frontages during the daytime (in the case of HFTs), displacement of retail provision and issues such as littering.

The Council has directly invested in town and district centres through the Pride in Our High Street programme to encourage start-up businesses on to the high street and support independent retail aligning with para 90 of the framework. The Council support a mix of uses but in the case of HFTs, vape shops and betting shops these need to be controlled to prevent an 'over predominance' in any part of a centre. This will prevent a run of uses that would detract from role of town centres as being diverse family friendly destinations that provide services and facilities for all residents in a safe environment. The practical application of this criterion is in Policy EC7 criterion b and c which guards against the over proliferation of these types of uses. For clarity the Council would consider three adjacent non-E use classes (HFTs, betting shops, vape shops and off licences) to be over proliferation.

Q42. Is Policy Strategic S7 justified, consistent with the evidence and does it accord with the relevant regulations?

Policy S7 is justified, consistent with the evidence and accords with relevant regulations. The NPPF makes multiple references to the need to secure infrastructure to support and as part of development proposals, therefore the policy is justified in providing applicants with a framework for the securing contributions. The policy further supports more detailed development management policies that will be used to secure contributions set out in Annex D of the plan.

As a result of the Regulation 19 consultation the Council has suggested a number of modifications to the policy to help provide further clarification regarding the circumstances where contributions will be required, the use of commuted sums and trigger points.

Part 4 of the policy addresses the use of viability review mechanisms, the use of a review mechanism will help ensure that the Council can, where required, secure policy compliant schemes and deliver infrastructure in line with the requirements of the NPPF. Proposed modifications (CD08) have been suggested to help provide

clarity and detail regarding the use of review mechanisms to, for example, set thresholds for their application. Further explanation around the use of review mechanisms can be found in document TP10 Developer Contributions and Review Mechanisms Topic Paper. Suggested additional supporting text has been proposed providing further detail on the application of review mechanisms.