

Barratt Redrow

Telford Local Plan Examination: Matter 4

Date of report: 23/01/2026

savills

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Document History

Issue	Date	Issued by	Comment
1.0	23/01/2026	MB	

1. Introduction

- 1.1 Savills has been instructed by Barratt Redrow to submit a Hearing Statement in response to Matter 4 of the Telford Local Plan Examination. This Statement expands upon the representations submitted to Telford and Wrekin Borough Council (“the Council”) at the Regulation 19 consultation stage for the Local Plan and provides a response to Issue 1 Questions 34, 35, 36, 37, 40, 41 and 42.
- 1.2 Barratt Redrow is promoting land to the south east of Newport, which is located in 3 distinct parcels: land east of A518 and west of Chetwynd Aston / Littehaes Road (Parcel 1); land west of A41 and south of A518 (Parcel 2); and land east of the A41 (Parcel 3). Parcels 2 and 3 include land within proposed employment land allocations EC2, EC3 and EC4.

2. Issue 1

Question 34: 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?

- 2.1 Point 1b of Policy Strategic S2 includes a “hierarchy of location”, which reflects the approach which needs to be followed when providing Biodiversity Net Gain (“BNG”) as part of a development proposal. BNG is also referenced within supporting paragraph 4.26. However BNG is not specifically mentioned within the policy wording. It is therefore considered that the policy should be reworded to make it clear whether the approach set out in Point 1b is specifically intended to address BNG or whether there is a wider objective. If there is a wider objective then the policy wording and supporting text needs to clarify what this wider objective is seeking to achieve. The current drafting of Policy Strategic S2 is accordingly deemed to fall foul of the requirements of NPPF paragraph 16d.
- 2.2 Furthermore Policy Strategic S2 needs to align with the updated guidance from the Government on BNG. The policy wording should make it clear that the “hierarchy of location” can be applied flexibly on a site by site basis, taking site specific circumstances into consideration.

Question 35: Is the employment land figure in Policy Strategic S3 justified by and consistent with evidence of need over the Plan period?

- 2.3 The Economic and Housing Development Needs Assessment (“EHDNA”) Part 1¹ identifies that the identified employment land need figure of 167ha (rounded up from 166.7ha) has been derived from the Labour Demand - Growth Scenario. This figure has been carried forward into Policy Strategic S3.
- 2.4 There is however an inconsistency between the employment need evidence base reporting referenced within paragraph 4.35 of the Publication Version of the Local Plan (CD01) and the employment evidence base submitted by the Council to support the Examination, which should be clarified. The referenced Part 2 EHDNA is not one of the submitted Examination documents. The Part 2 EHDNA should therefore either be published if this contains evidence which is relevant to underpin the Local Plan (in line with NPPF paragraph 32) or, if this document is not relevant or available, the reference should be removed from the Local Plan.
- 2.5 In addition the Publication Version of the Local Plan (CD01) references a 2023 version of the Telford and Wrekin Newport Employment Land Need Study, but the version which appears in the evidence base (EH06) is dated October 2024. It should therefore be made clear whether this difference in date / version has a material bearing on the evidence base.

Question 36. (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?

- 2.6 The Newport Employment Land Needs Study² recommends that a minimum of 11.7 hectares of additional floorspace should be identified through new allocations in Newport in order to support

¹ EH03. Economic and Housing Development Needs Assessment Part One. Prepared by Strategic Planning Research Unit. Dated October 2020. Paragraph 9.42.

² EH06. Newport Employment Land Need Study Telford Local Plan 2020-2040. Prepared by Strategic Planning Research Unit. Dated October 2024. Paragraph 9.13.

future economic investment in Newport in recognition of the contribution that the Newport sub-area plays to the Telford and Wrekin Borough economy. The Study also recognises that the requirements of different sectors within the sub-area may differ quite significantly to existing provision and proposes that there is a need to provide for a wider flexibility and contingency to respond resiliently to the rate of take-up at, and types of development being accommodated at, Ni.Park (notably its protection for agri-business uses). It is noted that the identified Newport sub-area employment need is being presented as a locally-responsive approach to meeting some of the wider need identified through the EHDNA.

- 2.7 Table 8 of the Publication Version of the Local Plan proposes 3no. allocations in the Newport Sub area on the southeastern edge of Newport, adjacent to the A518: EC2; EC3 and EC4, all of which are shown to be within a Strategic Employment Area. Collectively these are estimated to provide c.24.9 hectares of employment land, which address the minimum requirements for the Newport sub area whilst also making a positive contribution to the strategic employment land requirement for the Borough as a whole.
- 2.8 It should be noted that allocations EC2, EC3 and EC4 are located on the edge of the second largest urban area in the Borough, adjacent to existing and proposed commercial development and benefit from direct access to the strategic road network (A518 and A41), as well as close proximity to the M54. In particular it should be noted that these sites provide sufficient size to accommodate a range of employment uses and thereby assist with ensuring that the employment land supply for the Newport sub area can provide a flexible and resilient response to the employment market over the new Local Plan period. These sites score favourably within the Site Assessment reporting³ and are also available to come forward for development in the immediate term. These sites are therefore considered to make a significant contribution to meeting the Local Plan employment land requirements and vision.

Question 37. 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?

- 2.9 The Local Plan 'Vision, Priorities and Profile' (page 22) identifies that the key sectors of the economy include: advanced manufacturing and agri-tech; defence; engineering; plastics; IT outsourcing and data centres; construction; retail; food and drink; and tourism. In addition the Local Plan Development Strategy and strategic policies (page 25): propose that the levels of development for Telford, Newport and the rural area of the Borough will be based on a broad split of existing population levels; highlights that Newport plays a key role in the Borough's economy; and notes that the economic role of Newport has increased with the development of the Newport Innovation Park (Ni.Park).
- 2.10 The Local Plan Policies Map identifies the locations of large Strategic Employment Areas in and around Telford, as well as the locations of the new employment allocations, sustainable communities, mixed use allocations and employment sites carried forward in and around Telford. There is accordingly a significant focus on delivering new development, including employment development, in or on the edge of Telford, befitting the role of Telford as the major service centre for the Borough.
- 2.11 In line with the broad settlement hierarchy, and as set out in the response to Question 36, the Local Plan also makes provision for a significant quantum of new employment development within a Strategic Employment Area on the edge of Newport. These new allocations at Newport will assist

³ AS03. Telford and Wrekin Telford and Wrekin Employment Allocation - Site Assessments - April 2025.

with ensuring that Newport can continue to play a key role in the Borough's economy as well as capitalise on the success of existing businesses and sectors whilst providing a flexible and responsive opportunity to support a diverse range of other employment-generating activities and sectors.

- 2.12 At a strategic level the Local Plan therefore proposes an approach to employment land location and delivery which responds positively to the Local Plan Vision and development strategy. The Local Plan includes a range of different types of new employment land supply, the largest of which is at the new sustainable communities. The overall employment land supply for the Local Plan period of 205.7ha represents an overall surplus of 62.5ha employment land against a residual need of 143.3ha once completions have been taken into account⁴, which befits the intention to boost the local economy and follow an employment-led growth scenario.

Question 38. Is the Plan soundly based, having regard to Framework paragraph 90 and anticipated needs for retail, leisure and other town centre uses?

- 2.13 No comment.

Question 39. 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?

- 2.14 No comment.

Question 40. Is Policy Strategic S5 sufficiently clear how development proposals should mitigate and adapt to climate change and how such proposals will be considered?

- 2.15 There is a need for Policy Strategic S5 to be clear on what the intention is for the demonstration of sustainability in new developments in the context of Net Zero. It is not expressly clear whether the Policy wording in the Publication Version of the Local Plan (CD01) is seeking for new developments to achieve Net Zero Carbon or whether the wording is seeking for new developments to contribute positively to the national Net Zero Carbon agenda. This should be clarified and the Policy reworded accordingly. It should also be noted that the evidence base for the Local Plan, notably in relation to viability, does not assess the implications of a requirement for new development to achieve Net Zero Carbon and such a requirement would accordingly not be considered to be justified. The proposed amended wording to the Policy within the Submission Version of the Local Plan (CD08) would address this particular point.

- 2.16 The Court of Appeal ruling following the challenge made to a 2023 Written Ministerial Statement⁵ confirmed that it is possible for Plan-makers to set local energy efficiency standards above national Building Regulations, but only if robust, costed evidence is provided that development remains viable and impacts on housing supply have been considered. Robust, costed evidence has not been provided alongside the submission of this Local Plan and therefore it is considered that the relevant national standards at the point of adoption remain the Building Regulations in force at the time unless a new evidenced local standard is subsequently brought in.

⁴ Telford & Wrekin Council Local Plan 2021-2041: Employment Land Delivery Topic Paper. December 2025. Section 6.0.

⁵ Local Energy Efficiency Standards Update. Written statement made in House of Commons by Minister of State for Housing on 13 December 2023.

Question 41. 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?

- 2.17 Recognition of the need to address health and wellbeing through new development has risen in prominence in recent years on both the local and national agendas. The matters which are highlighted within Policy Strategic S6 are consistent with objectives set out within the NPPF, whilst incorporating flexibility to enable these matters to be addressed appropriately on a site-by-site basis. Nevertheless it is considered that there is still an opportunity to accommodate further flexibility into the Policy wording to ensure that the Policy can adapt to any potential updates to national and local health and wellbeing policy and site specific circumstances. Such an approach is supported by NPPF 2024 paragraph 16a which requires planning policies to be prepared with the objective of contributing to the achievement of sustainable development.

Question 42. Is Policy Strategic S7 justified, consistent with the evidence and does it accord with the relevant regulations?

- 2.18 It is considered that recognition should be given within Policy Strategic S7 to the need for planning obligations for new developments to meet the tests set out December 2024 NPPF paragraph 58 and Community Infrastructure Levy Regulations Regulation 122(2)). This is imperative to ensure that any contributions required are fair and reasonable.
- 2.19 The Government is pushing to achieve higher economic growth. The swift delivery of employment and residential schemes forms an imperative part of this growth agenda. The submission of a viability appraisal at the start of, or during, the development process is sometimes necessary in order to take account of market forces at that time and enable development to keep progressing viably. However no consideration has also been given to the time and cost challenges involved with negotiating a viability appraisal. The Policy wording also has an upward only focus and does not recognise that a further viability appraisal may highlight a further deterioration in viability, for which the Policy wording currently does not include any specific recourse action for the Council to rectify this.
- 2.20 Significantly it is important to note that a viability review is not just about gross development value (“GDV”), it also takes into consideration development costs and timescales. The inclusion of a provision in the Policy wording to claw back funding in all cases where the GDV has been exceeded, up to the delivery of a policy compliant scheme should a viability case have been made previously, therefore fails to recognise that increased GDV is not automatically synonymous with increased viability and is accordingly considered to be unduly onerous and is not positively prepared or justified (in line with the December 2024 NPPF paragraphs 36a and 36b). In this regard this particular policy provision has accordingly not been thought through or justified and should therefore be removed.

[Statement word count: 2,287 words in total].

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