

100
YEARS



**Campaign to Protect
Rural England
Shropshire**

**Representor ID: E170
CPRE Shropshire**

**Examination of the
Telford and Wrekin Local Plan Review 2021-2041**

**Hearing Statement for:
Matter 4: Strategic Policies (other than Housing)**

January 2026

1. Issue 1: Have the Strategic Policies been positively prepared?

Questions 34-36. Employment land:

- 1.1 CPRE Shropshire consider the employment evidence to be bullish, based on aspirational LEP targets, with the completions data skewed by the large one-off MOD Donnington site.
- 1.2 We think there is a case for a lower requirement, and any regionally significant site to be considered as part of a wider study, including adjacent authorities and land at the West Midlands Rail Freight Interchange.
- 1.3 **If all the sites currently in the plan are considered acceptable there is a case for a proportion of the employment land being identified as meeting needs in the wider Greater Birmingham and Black Country Housing Market Area (GBBCHMA).**
- 1.4 **Given the on-going work in relation to unmet needs across the GBBCHMA, the plan should identify the quantum of land available to meet other areas' needs subject to that further work.**

Employment Assumptions (EHDNA)

- 1.5 The EHDNA is now somewhat dated, having been completed in October 2020 during the pandemic. No more-up-to-date assessment, and apart from work in Newport, no new modelling work, appears to have been undertaken to confirm the evidence is still robust.
- 1.6 The EHDNA first identified the Functional Economic Market Area (FEMA) for Telford and concludes, based on the level of self-containment, that Telford can be considered a separate FEMA. The evidence, however, was mixed because Travel to Work (TTW) evidence suggests strong linkages with parts of Shropshire and there is a clear link to the M54 corridor, as well as TTW evidence from the Black Country which suggested a significant relationship with Telford.
- 1.7 The EHDNA then considered completions data and other background data from which it projects forward to get an estimate of future employment needs, as set out in Table 22. One

particular element of note is the very large one-off development at MOD Donnington, which increased the need dramatically when included.

Table 22. Employment Land Needs Based on Past Completions Trends, 2020-40

MOD Donnington Assumption	Open Storage Assumption	B1a/b	B1c/B2	B8	Total
Excluded	No	19.1	81.3	24.8	125.2
Excluded	Included	19.1	81.3	35.5	135.9
Included	No	20.9	81.3	75.6	177.8
Included	Included	20.9	81.3	86.3	188.5

- 1.8 The report went on to examine three different models for future economic growth, Cambridge, Oxford Econometrics (OE) and Experian.
- 1.9 It is worth noting the different demographic assumptions behind these models (Paras 7.5-7.23) which may explain their very different outputs.
- 1.10 Cambridge Econometrics (CE) is an unrestrained model which assumes labour supply will meet demand and does not restrict it demographically. OE bases its assumptions on the ONS2016 figures which are, as we noted above, considerably lower for Telford than the ONS2018 figures.
- 1.11 Experian relies on the ONS2014 figures, and so one might expect it to result in lower projections of employment. However, it is to be noted that it uses regionally based figures and the ONS2014 regional figure is higher (some 44,000 higher across all West Midlands authorities in 2021 between ONS2014 and ONS2018).
- 1.12 The result is that CE showed a job growth for the period 2020-40 of 12,130 jobs, Experian showed a growth of 13,900 jobs, and OE showed a net loss of 770 jobs over this period. While CE and Experian are broadly similar, overall the demographic basis is different, but it is probably fair to say that both relied on more unrestrained growth and on either in-migration or commuting.

Table 24. Jobs Growth by Broad Sector, 2020-40

	CE	Experian	OE
Agriculture, Forestry & Fishing	-20	-500	-70
Extraction & Mining	-40	0	-40
Manufacturing	-700	-1,300	-5,000
Utilities	-30	100	-200
Construction	400	500	200
Wholesale & Retail	20	1,700	-500
Transport & storage	800	1,300	-60
Accommodation, Food Services & Recreation	2,700	800	300
Information & communication	1,800	1,200	500
Financial, Professional & Business Services	3,600	6,000	3,700
Public Services	3,600	4,100	400
Total	12,130	13,900	-770

1.13 However, it can be seen in Table 24 that the Experian and CE projections have very different sectoral profiles. Para 7.41 suggested this is explained by different assumptions on a post-COVID boost.

1.14 The EHDNA went on to examine potential growth sectors based on the Marches Local Economic Partnership's (LEP's) Local Investment Strategy. Para 7.91 suggested this approach is in line with the PPG. However, there has been criticism in the past of reliance in Plan Making on LEP aspirations which are, just that, aspirations and tend, understandably, to set high goals.

1.15 The result for Telford was shown in Table 34, and included growth forecast beyond any of the projections. It relied on an additional 3,200 jobs above the highest figures given by the three projections, and so would require even greater commuting or in-migration and could impact further on the work force in neighbouring areas (as we also considered in Matter 3).

Table 34. Comparison of Forecasts for Telford & Wrekin

	Jobs Growth 2020-40	Annual Growth Rate 2020-40
CE	12,063	0.61%
OE	-923	-0.05%
Experian	13,900	0.70%
Growth Forecast	17,100	0.80%

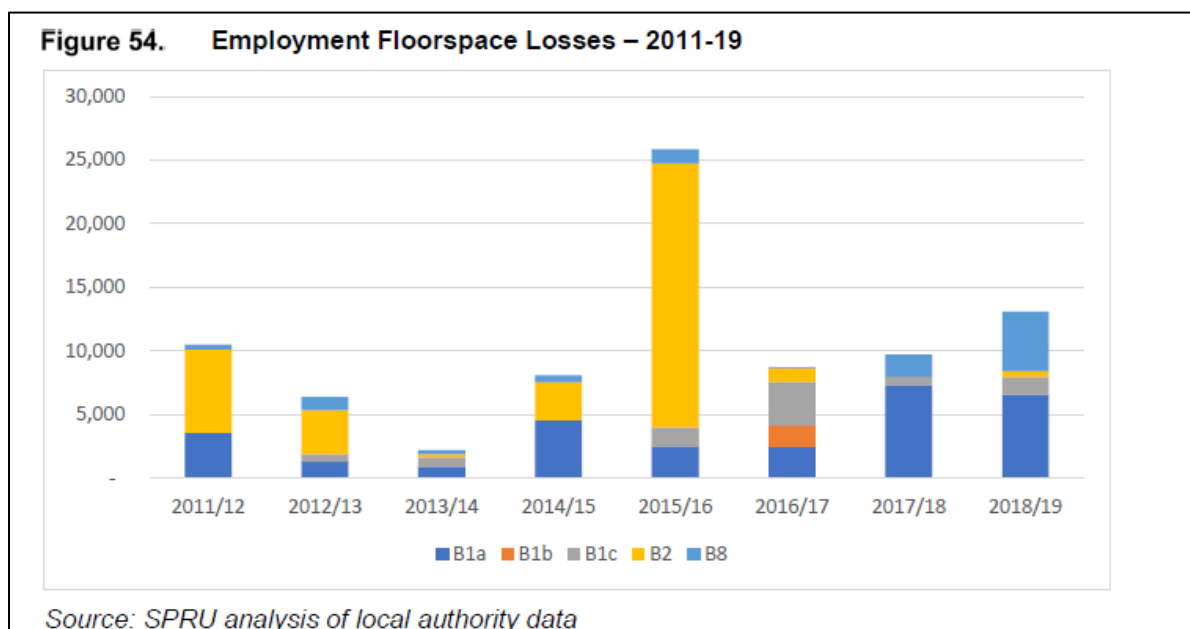
- 1.16 Table 36 broke these totals down by sector. That made it clear that Telford's growth strategy most clearly matches the Experian output with lower growth in accommodation and much higher growth in financial services.
- 1.17 What was also noticeable was the assumption of growth in manufacturing where the LEP is aiming in its LIS for growth which exceeds the most optimistic projection by 2,200 (with all the three projections showing a decrease). Given the many economic risks, the LIS growth for manufacturing seems highly aspirational.

Table 36. Sectoral Brexit Risk Rating, Telford & Wrekin

Sector	Total Jobs 2020	Forecast Jobs Growth 2020-40				Brexit Risk
		CE	OE	Experian	Growth	
Agriculture and mining	800	-200	-200	-500	0	Med
Manufacturing	14,200	-700	-5,000	-1,100	1,500	Med
Electricity, gas & water	1,200	0	-200	100	100	Low
Construction	5,200	400	300	400	400	Med
Wholesale and retail trade	15,300	0	-500	1,700	1,700	High
Transport & storage	4,300	700	0	1,300	1,300	High
Accommodation & food services	2,900	2,700	300	700	700	High
Information & communications	3,900	1,800	500	1,100	1,100	Med
Financial & business services	19,700	3,600	3,400	5,600	5,600	Med
Government services	22,400	3,600	400	4,200	4,200	Low
Other services	3,800	0	300	300	300	Low
Total	93,700	11,900	-700	13,800	16,900	

- 1.18 These job figures were then converted into Net Employment Land Needs.
- 1.19 Two additional requirements for land were then added. The first was for replacement need. This was based on past employment land losses to other uses. The extent of those is set out in Table 54. A notable fact was the very high B2 losses in 2015/16, over 25,000 sq. m, nearly 30% of the ten-year total.
- 1.20 The average was given as 10,561 sq. m. per annum, but if that outlier year were excluded, would be closer to 7,000 sq. m. (it is impossible to calculate exactly without the figures behind the graph). The replacement demand, set at 52.8 hectares in Table 55, might then be closer to 35 hectares (as we also consider under Matter 3).
- 1.21 The report did not examine whether there are exceptional reasons for this loss although it may relate to changes in legislation.

1.22 A further 10.7 hectares was identified in Table 56 for Open Storage. Again, this was based on past completions since it does not relate specifically to employment growth. While this seems justified it did not explain whether the expected sectoral growth justified a continuation of past trends.



1.23 Lastly a margin of 5 years completions was added. It should be noted that the 5-year margin was not only the top of the required range, but also based on completions including MOD Donnington which was acknowledged to be a one-off development.

Table 60. Total Employment Land Needs (ha) – Comparison of Labour Demand Scenarios, 2020-40

Stage	Description	CE	OE	Experian	Growth Scenario
i-iv	Net Growth Needs	29.3	-48.2	46.2	72.8
v	Net to Gross	52.8			
vi	Demand for Open Storage	10.7			
vii	Changing Trends in Working from Home	-14.6	-9.7	-13.2	-14.1
viii	Margin of Flexibility	44.5			
ix	Total Employment Land Needs	122.7	50.1	141.0	166.7

Table 61. Total Employment Land Needs (ha) – Comparison of Labour Demand Scenarios, 2020-40

	B1a/b	B1c/B2	B8	Total
CE	38.0	38.3	46.4	122.7
OE	24.9	-5.2	30.4	50.1
Experian	32.3	36.4	72.2	140.9
Growth Scenario	32.3	62.2	72.2	166.7

1.24 Not surprisingly, given the bullish view of manufacturing, the Growth Scenario included a large amount more B1c/B2 development and both the Experian projection and the Growth Scenario include much more B8.

Table 64. Total Employment Land Needs (ha) 2020-40 – Comparison of Scenarios

	B1a/b	B1c/B2	B8	Total
Labour Demand – Experian	32.3	36.4	72.2	140.9
Labour Demand – Growth Scenario	32.3	62.2	72.2	166.7
Completions Trend – Excluding MOD Donnington	19.1	81.3	35.5	135.9
Completions Trend – Including MOD Donnington	20.9	81.3	86.3	188.5

1.25 The EHDNA went on to compare these scenarios together (but eliminated the CE and OE projections). The results were set out in Table 64. The EHDNA considered that the completions trend acted as a ‘useful comparison’ and concluded that the employment land provision should be somewhere between 167 and 189 hectares (Para 10.32).

1.26 The EHDNA suggested the difference in the Growth scenario and the higher Completions Trend (10.31) could at least be partly explained by the 14 hectares discounted in the Growth Scenario due to a forecast uptake in home working. This did not make immediate sense given the B1a/b completions were much lower than the labour demand trends.

1.27 The role of MOD Donnington also raised questions. Its inclusion was discussed in Paras 6.55 to 6.22. The reason for it was cited as being so as not to:

‘risk restricting the supply of available land such that future opportunities for inward investment or expansion of existing employers might be constrained.’

- 1.28 However, investment in such a large site for a single use was clearly unusual and may reflect specific circumstances relating to the MOD. Future investment in such a large distribution unit would be of regional significance and would need to be considered in a wider context, notably taking account of the West Midlands Rail Freight Interchange and other proposals across the West and even East Midlands.
- 1.29 Lastly, it is not clear to us that the level of replacement need is justified. If 2015/16 is considered an outlier year for employment land losses, that projection might actually be 15-20 hectares lower.
- 1.30 That would suggest a lower provision for employment land should be adopted and land should only be identified, if needed for a Regionally/Nationally significant site, following a wider study of large-scale logistics need.

Employment Supply

- 1.31 The plan adopted an employment figure of 167 hectares in Policy Strategy S3 split in line with the Growth Scenario Table 3.3. The appendix B gave a list of sites.
- 1.32 According to Para 3.1:
- To date the Council has an existing supply of 76.5ha and the Plan allocates land to deliver a minimum of 90.5ha of new employment land.*
- 1.33 A list of new sites was given in Table 11 of the Appendix to the Plan which amounted to 91.6 hectares, marginally above the figure in Policy S3.
- 1.34 It was not clear from the Plan, however, how much of the land was suitable for the desired employment split, in particular, how much would meet the 32 hectares for offices and whether some of that could be supplied at new mixed use (some identified around Telford centre) or other town centres redevelopments.
- 1.35 The other obvious fact about the supply table was that most of the sites are relatively small, mostly under 12 hectares with only two at 18.8 and 17.5 hectares respectively.

1.36 This suggested the Council is not seeking a large regionally significant site (of the MOD Donnington size) which again brings into question the size of the overall requirement and whether it is skewed by the inclusion of MOD Donnington in the completions evidence.

Employment Topic Paper

1.37 The Employment Topic Paper (ETP) updates the Council's position, most specifically the change of Plan Period to 2021-2041. This, it says, updates the need from 166.7 to 169 hectares but still based on the same evidence.

1.38 Para 3.5 references the inclusion of MOD Donnington (but gives the impression it has not been included). However, if one looks at the Table 6 of the EDHNA it is clear that the Completions evidence without MOD Donnington is only 135.0 hectares (to 2040), much lower than the Growth Strategy.

1.39 In other words, the growth strategy remains significantly higher than the completions evidence supports if MOD Donnington is excluded.

1.40 The report also specifically identifies 22.1 hectares to meet Newport's need of 11.7 hectares. CPRE has not specifically considered the justification for that need.

1.41 The ETP also says Telford has not had any Duty to Cooperate requests in relation to Employment Land.

1.42 Responses in the Duty to Cooperate appendices (SC01a) suggest this is partly because there is on-going work across the GBBCHMA on cross boundary employment issues, as Shropshire Council point out.

1.43 South Staffordshire Council also suggest a similar state of play saying:

'SSDC and TWC will continue to work together collaboratively to monitor any cross-boundary employment issues, including considering the findings of the WMSESS 2024 through future plan-making.'

1.44 Sandwell Council say they will write separately to Telford about employment issues but we cannot see a letter in the bundle from them.

- 1.45 We are aware that Birmingham is assuming a shortfall of 59 hectares on employment land, (Birmingham Preferred Options 2025, Para 6.9) which would be part of that broader analysis but it is not one of the authorities immediately neighbouring Telford.
- 1.46 Para 4.3 identifies a net loss of employment land of 0.5 hectares. While this might suggest a less positive outlook, the ETP (Para 4.4-4.6) does not recalculate economic growth projections which it said would lead to a lower result.
- 1.47 Such a lowering of expectations it puts down to short-term constraints such as the Ukraine War and inflation. This they admit put them at odds with the forecasting firms, who presumably do not consider these impacts will be as short term.
- 1.48 The ETP even adds back the lost employment land which, while marginal, seems an odd thing to do.
- 1.49 In terms of supply the updated figures show a total supply of 172.5 hectares as well as 13.5 hectares of current permissions giving a surplus of 16.9 hectares.
- 1.50 **Assuming all the sites in the Plan are deemed acceptable this would still allow some leeway for employment land to meet needs in the wider region, especially given the bullish nature of the needs assessment.**

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2,015 words (excluding title page and this paragraph).