



Telford and Wrekin

Local Plan Review Examination

Hearing Session Statement

Matter 4: Strategic Policies (other than Housing) (ISSUE 1)
Representor ID: E82
Representor: Estate of David J Tringham

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1.0 Introduction

- 1.1 This Matter 4 Statement has been prepared by BERRYS on behalf of the Estate of David J Tringham ('our Client') which is promoting Land at A41/A518 Roundabout, Newport (the 'site') for employment development (Call for Sites Ref: 710).
- 1.2 The site is suitable for meeting the employment needs of Newport and the wider borough of Telford and Wrekin in the Plan period and should be identified as an allocation in the Telford and Wrekin Local Plan Review.
- 1.3 This Matter Statement should be read in conjunction with our representation made to the Regulation 19 consultation of April 2025 (submitted on behalf of the client by 99&9 Consulting Ltd).

2.0 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?

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

The employment land figure in policy S3 has been derived from the Telford and Wrekin Economic and Housing Development Needs Assessment (EHDNA) Part 1 2020.

The EHDNA details that a range of future jobs growth scenarios were considered and translated into different levels of employment land requirements, ranging from 140.9ha. under the 'Labour Demand – Experian' scenario to 188.5ha. under the 'Completions Trend – Including MOD Donnington' scenario. The scenario which ultimately provides the basis for the employment land figure in policy S3 is the locally derived 'Labour Demand – Growth Scenario' as this was "considered to be more realistic than the completions trend scenarios" (paragraph 3.6 of the Employment Land Delivery Topic Paper).

The employment land figure in Policy Strategic S3 of 167 (169) ha. is considered to be an underestimation of the employment land required to meet the needs of Telford and Wrekin over the Plan period, and will have a negative effect on the future economic growth of the borough, for the following reasons:

- Reliance upon a labour demand scenario is considered to be outdated due to the changing nature of the economy, most particularly the ever-reducing connection between employment generation and floorspace required to accommodate growth. The move towards a modern economy brings with it the need for greater efficiency and the use of automation and AI. As a consequence, there is a stronger link between GVA growth and floorspace requirements, with Labour Demand scenarios significantly underestimating the need for floorspace.
- The 'Completions Trend – Including MOD Donnington' suggests a greater level of provision (at 188.5ha) than the 'Labour Demand – Growth Scenario' (at 166.7ha) and this is considered a more accurate and appropriate prediction of employment land needs. Paragraph 10.24 of the EHDNA details that the 'Completions Trend – Including MOD Donnington' includes for the development of a 84,000sqm floorspace warehouse unit and 2,787sqm of office space at MOD Donnington. This development was considered as an anomaly within the EHDNA and a further 'Completions Trend – Excluding MOD Donnington'

scenario was provided. However, there has been a significant increase in demand for large scale 'Amazon' style warehousing due to the continued growth of e-commerce, particularly in locations with good access to the primary road network.

- The 'Labour Demand – Growth Scenario' was "considered to be more realistic" than the completions trend scenarios as it "includes provision for increased levels of home working in the future" (paragraph 10.32 of the EHDNA). However, recent statistics from the Office for National Statistics identify that the numbers of people working exclusively from home has dropped significantly since 2022. This, combined with employers increasingly looking for workers to return to the office, the constant proportion of employees who are unable to work from home and the trend for workers to favour hybrid working, rather than exclusive home working, indicates that the assumption of reduced work space requirements based on increased levels of homeworking in the future is unjustified and points towards a further under estimation of work space, and therefore employment land, required to meet the needs of the borough.
- The Council's updated Employment Land Delivery Topic Paper (December 2025) details, in table 1, that the employment land requirement of 166.7ha. is made up as follows:
 - 32.3ha. for employment use classes Eg(i) and Eg(ii): offices / research & development
 - 62.2ha. for employment use classes Eg(iii) / B2: industrial processes / general industrial
 - 72.2ha. for employment use classes B8: storage and distributionNo allowance has therefore been made for the provision of land to meet the needs of other sectors of the economy including sui generis activities that are employment and business led. Such sui generis activities can include Electric Vehicle and Digital infrastructure developments, such as charging stations and digital data centres. Such activities play an increasingly significant role in the development of a modern economy and are supported by the Government's 'Invest 2035: The UK's Modern Industrial Strategy'. Paragraphs 86 and 87 of the National Planning Policy Framework (NPPF) detail the importance of planning policies recognising and address the specific needs of these sectors. These needs include specific locational requirements, that may not be met on existing traditional industrial estates and business parks, such as proximity to energy, fibre and transport infrastructure provision.
- Similarly, the disaggregation of jobs growth in each sector based upon the existing mix of jobs in each sector in the borough (as detailed in paragraph 3.9 of the Employment Land Delivery Topic Paper) fails to recognise the move towards, and development of, a modern economy. To ensure that estimates of sectoral jobs growth are more realistic an uplift in jobs in the high tech, digital and supporting sectors is required.

To conclude, the evidence base upon which the employment land figure proposed in policy S3 is based, is considered outdated and provides an unnecessarily pessimistic view of the economic outlook of the borough. The employment land figure should be reconsidered, revising upwards with additional sites identified and allocated to meet identified needs.

Question 36. (a) Does the Plan identify sufficient land to meet the identified need for employment land?

As detailed within the response to Question 35 above, the employment land figure proposed in policy S3 should be reconsidered and revised upwards, with additional sites identified and allocated to meet identified needs.

The Newport Employment Land Need Study (October 2024) considers the need for employment land within the Newport sub-area and is to be read alongside, and builds upon, the EHDNA. The Newport Study recognises that Newport plays a significant role in recent delivery and planned future employment growth in the borough and emphasises (paragraph 0.16) the importance of providing sufficient space for growth not only in quantitative terms, but also in qualitative terms.

In quantitative terms, Newport Sub-Area's need for employment space is assessed using labour demand, labour supply and past take-up rate scenarios. These scenarios provide a range of employment land needs from 10.8ha. to 15.8ha. with the Study concluding that the minimum residual employment land needs figure to be met through new allocations in the Newport sub-area is 11.7ha, made up of a baseline residual need of 7.8 hectares, plus an additional 3.9 hectares (50% uplift). The concerns raised within this hearing statement relating to the EHDNA's assessment of employment land needs is similarly applicable to the assessment undertaken in the Newport Study.

Aside from issues with the overall quantity of employment land, it is evident that additional sites should be identified and allocated for employment purposes in the Newport sub-area for qualitative reasons.

The Study details (paragraph 0.11) that out-commuting from Newport is significant, and that this is, in part, potentially a qualitative mismatch between labour supply and opportunities available in the labour market locally (labour demand)".

However, the qualitative assessment of employment land needs in both the EHDNA and the Newport Study is limited to interviews with stakeholders with interests relevant to economic development in Newport. However, it is evident that limiting the assessment in this way is likely to be biased towards existing, larger scale, employers operating in traditional employment land uses within the Newport sub-area. It will fail to pick up upon the needs of smaller scale operators and those operating in alternative sectors as they are likely to be poorly represented. No detailed assessment of scale, location and quality of sites has been undertaken to determine whether an appropriate range of sites within the sub-area has been provided.

In this regard the Study supports the redefinition of the existing Strategic Employment Area (SEA) boundaries to meet the need for employment land over the Plan period. Whilst this proposal may meet the stated quantitative need for employment land, it runs contrary to the Study's findings in terms of the need to provide a qualitative choice of sites.

The draft Plan's employment land allocations are located within the extended SEA boundaries. As a consequence, all of the proposed employment site allocations are relatively large allocations sited within the same geographical area, as follows:

- EC2: Land East of A518
- EC4: Land southeast Newport Town Centre
- EC5: Land at AGA Rangemaster, Waterloo Road

The clustering of these allocations means that there is no choice of sites either qualitatively or by size and location. For example, there are no sites identified to accommodate developments that may have one or more of the following requirements:

- need for specific service/infrastructure provision (e.g. digital and EV infrastructure developments)
- require locations away from large scale employment site areas; not suited to neighbouring other forms of employment land uses (e.g. noise and odour susceptible developments)
- require delivery in the short term (e.g. unencumbered by site lead in times / infrastructure improvement requirements)

Further identification and allocation of sites within Newport is therefore justified to provide a qualitative, size and locational choice in the sub-area.

In conclusion, the range of allocated sites in the Newport sub-area fails to build upon the recent economic success of Newport nor does it seek to tackle the low levels of self-containment in the sub-area. In addition, the proposed supply of employment land provides little variety and choice in terms of quality, location or size. Further employment sites should therefore be identified in the Newport sub-area that will add to supply and provide a greater range and choice of sites.

Question 36. (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?

As detailed within the response to Question 36(a) above, the proposed supply of employment land fails to provide a qualitative range and choice of sites. The delivery strategy for employment land contained within Policy Strategy S3 is restrictive and fails to ensure that this lack of a qualitative range and choice of sites will be addressed.

The delivery strategy seeks to restrict the provision of new employment development within the urban area to sites that lie within Strategic Employment Areas and further restricts (within policy EC1) the employment uses permissible in those areas. Whilst the strategy would enable sites to come forward within the urban area outside of the SEAs these are only supported if they meet a number of criteria, including where sites are located "in close proximity to a SEA" (although no definition of 'close proximity' has been provided) or, in exceptional circumstances, elsewhere.

The strategy similarly restricts the provision of new employment development within the rural area to sites that comply with the criterion provided in policy EC3. Given the policy wording of EC3 it is

assumed that all of the criteria within part 2 will need to be met in order for development on new greenfield employment sites in the rural area to be supported.

In conclusion, the proposed delivery strategy is restrictive and, as a consequence, fails to provide any certainty that the lack of a qualitative range and choice of sites within the proposed employment land supply can be addressed. The delivery strategy should therefore be amended, and further employment sites allocated, to provide an appropriate range and choice of employment sites.

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?

The text of Policy Strategic S3 supports the delivery of 167 (169) ha. of employment land over the Plan period. The supporting text to Policy Strategic S3 identifies that this proposed employment land requirement is derived from the EHDNA and the updated Newport Employment Land Needs Study and is split between the following uses:

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

The evidence base documents that seek to identify need for employment land are therefore limited in scope to only the traditional employment land uses.

In addition, Policy Strategic S3 also states that employment development will be supported and delivered in accordance with Policies S1, EC1 and EC2 (although the later is presumably an error and should state EC3). Policy EC1, relating to employment development in the urban area and SEAs, makes clear that the SEAs will be the primary focus for employment development and that development proposals for uses falling within industrial, storage, distribution, sui generis uses associated with the B Use Class and business uses (Eg(i), Eg(ii) and Eg(iii)) will be supported. Whilst other uses outside of these will generally not be supported. The proposed policy framework is, as a consequence, unduly restrictive as it limits employment development on allocated sites and within SEAs to only traditional employment land uses.

Given the above, it is evident that key aspects of Telford and Wrekin's economy have been overlooked. As detailed within the response to question 35 above, no allowance has been made for the provision of land to meet the needs of other sectors of the economy which play an increasingly significant role in the development of a modern economy for the borough and are supported by national and local strategies such as the Government's 'Invest 2035: The UK's Modern Industrial Strategy' and the Council's 'Public Electric Vehicle Charging Infrastructure Strategy'.

To conclude, the evidence base upon which the employment land figure proposed in policy S3 is based, should be reviewed and expanded to consider a greater number of employment sectors, with additional sites identified and allocated to meet identified sectoral needs.