

Hearing Statement: Matter 4

Telford and Wrekin Co-operative Council – Local Plan Examination

23 January 2026 | Confidential

Matter 4 – Strategic Policies (other than Housing)

Introduction

- 1.1 This Hearing Statement has been prepared by Knight Frank on behalf of Telford Trustee No.1 Ltd and Telford Trustee No.2 Ltd ('The Trustees').
- 1.2 We submitted our representations to the Regulation 19 Draft Local Plan in May 2025. The Regulation 19 representations Representor ID being E142.
- 1.3 As part of the Local Plan Examination Submission, Telford and Wrekin Co-Operative Council ('TWCC') published a Statement Prepared under Regulation 22 (1)(c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 outlining the Council's response to the Regulation 19 consultation comments received.
- 1.4 The representations were submitted in respect of the Trustees' landholdings at Blue Willow Car Park (Site Allocation MU2) and Lime Green Car Park (Site Allocation MU3) (together 'the Sites'), as well as other Local Plan policies affecting town centre development.
- 1.5 Paragraph 36 of the National Planning Policy Framework ('NPPF'), which the Local Plan will be considered against, requires that any Plan submitted to the Secretary of State for Examination must be capable of being found both legally compliant and sound. This includes ensuring the Plan is:
 - **Positively prepared** – seeking to meet objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence;
 - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred; and
 - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.
- 1.6 A Draft Local Plan should comply with the above criteria to be considered in compliance with the NPPF.

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?

Policy Strategic S2 – Nature Conservation

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?*

Response:

- 1.7 Developers are required to deliver 10% Biodiversity Net Gain ('BNG') as required by the Environment Act 2021; this is required irrespective of Local Plan policies.

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- 1.8 The requirement for 10% BNG is not necessary in the Draft Local Plan as this is already covered in national policy. NPPF Paragraph 16f sets out that Local Plans should serve a clear purpose, avoiding unnecessary duplication of policies that
- 1.9 The Council's Regulation 22 consultation statement records concerns about the need for a location-based hierarchy for biodiversity improvements - explicitly to apply "where possible and viable" - particularly for constrained urban sites. However, no changes were made to the policy on this point.
- 1.10 As currently drafted, our view is that Strategic Policy S2 does not provide flexibility for BNG solutions that properly account for viability and deliverability on constrained, town-centre plots. In the absence of this, the policy risks undermining deliverability where on-site 10% cannot reasonably be achieved, including within Telford Town Centre and the Primary Shopping Area ('PSA').
- 1.11 Therefore, we do not agree that Strategic Policy S2 is justified or effective and we ask the Inspector to consider the suggested supplementary policy and supporting text amendments we have put forward previously.

Town Centre Uses

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

Response:

- 1.12 The Trustees support the preparation of the Local Plan and support the continued recognition of Telford Town Centre at the peak of the retail hierarchy, and the additional flexibility inserted into the new policies to assist (Policies EC6 and EC7). The Trustees have commented on the key policies within the draft Local Plan in earlier consultation responses (Representor ID: E142) and broadly support their content and ambition.
- 1.13 However, it is notable that no up-to-date assessment of need for retail and leisure has been undertaken to support the local plan process. In the absence of proportionate, current evidence, we have concerns regarding the robustness of the evidence base underpinning the draft Local Plan and the resulting impact on policies - notably for managing out of town centre development.
- 1.14 Within the Town Centres Topic Paper (December 2025) the TWCC confirm that policies within the current Local Plan and draft Local Plan are broadly consistent and that there is increased flexibility provided to support regeneration and to maintain viability and vital town centres. This is supported by the Trustees. It goes on to list the various evidence base documents used to support the policies in the plan. It is the Trustees opinion that TWCC should undertake an up-to-date health check of Telford Town Centre and Primary Shopping Area so as to better understand that whilst Telford Town Centre is performing well, this is a fragile position that can be adversely impacted, especially by out of centre retail and leisure development. Whilst policies refer to ensuring the long-term viability and vitality of the Town Centres, without an evidence base that provides detailed insight as to the baseline health of these Centres, it is questioned how policies can be effective in seeking to meeting this aim.
- 1.15 The Trustees agree that no additional retail floorspace is needed or should be allocated, and that retail needs can be met within the existing Centres through redevelopment/reconfiguration of existing floorspace including through changes of use. However, understanding the health of the Centre is considered important.
- 1.16 To assist, we include a short note titled 'Telford Town Centre Topic Note January 2026' as part of the submission that summarises, at high level, the current performance and prospects of Telford Town Centre. The Note demonstrates that the centre remains a strong sub-regional destination, with recent development activity and planned allocations supporting its long-term vitality and viability. The document also highlights some of the risks that the Town Centre faces. As set out in our previous representations, we ask the Inspector to require current evidence when considering the Plan's soundness. The Trustees would be happy to support the Council in preparing a Town Centre Health Check for Telford Town Centre and any other evidence base they intend to prepare (if any).

Response to Main Issue Wordcount: 730

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