



Telford and Wrekin

Local Plan Review Examination

Hearing Session Statement

Matter 5: Allocations (ISSUE 1)

Representor ID: E82

Representor: Estate of David J Tringham

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Representor Details

Estate of David J Tringham

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1.0 Introduction

- 1.1 This Matter 5 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 5: Issue 1

Matter 5 – Allocations

Issue 1: Whether the allocations and their requirements are justified, effective, and consistent with national policy.

Question 43. Are the site allocations in Appendix 15 justified? Do they accord with the development strategy? Are they deliverable/developable and supported by the evidence? Is the estimated housing number for each site a reasonable figure based upon the evidence?

Within the development strategy chapter of the Plan (paragraphs 4.8 to 4.12) it is recognised that Newport plays a key role in the borough's economy, that this role has increased in recent years and that the strategy for Newport is to provide for new employment growth that recognises the town's role as a market town.

However, as detailed within this representor's hearing statement for Matter 4 (Issue 1), there are issues with both the quantitative and qualitative assessment of employment land needs that indicate the need for additional land to be allocated to meet the needs of the borough during the Plan period.

In summary, the quantitative assessment of employment land is considered to be an underestimation of the employment land requirement as it:

- Relies upon an outdated labour demand scenario which fails to recognise the changing nature of the economy, including the ever-reducing connection between employment generation and floorspace required to accommodate growth
- Fails to address the need identified in the 'Completions Trend – Including MOD Donnington' scenario, which recognises the continued growth of e-commerce
- Includes for increased levels of home working in the future, which ignores recent statistics from the Office for National Statistics (that identify that the numbers of people working exclusively from home has dropped significantly since 2022), that employers are 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.
- Fails to provide land to meet the needs of other sectors of the economy including *sui generis* activities that are employment and business led, such as *sui generis* activities including Electric Vehicle and Digital infrastructure developments
- Fails to recognise the move towards, and development of, a modern economy including increasing need for land to support the high tech, digital and supporting sectors.

Similarly, the qualitative assessment of employment land is also considered to be an underestimation of the employment land requirement as it is based solely upon interviews with stakeholders and is therefore biased towards existing, larger scale, employers operating in traditional employment land uses within the Newport sub-area. As a consequence, it fails to pick up upon the needs of smaller scale operators and those operating in alternative sectors with no detailed assessment of scale, location and quality of sites having been undertaken to determine whether an appropriate range of sites within the sub-area has been provided. In addition, the draft Plan's employment land allocations in the Newport sub-area are large allocations located within extended SEA boundaries. This means that there is no choice of sites either qualitatively or by size and location to accommodate developments that may not be suitable on the large, allocated sites. For example, developments with specific service / infrastructure requirements (e.g. digital and EV infrastructure developments), uses that require locations away from large scale employment site areas (e.g. noise and odour susceptible developments) and developments that require rapid delivery (e.g. unencumbered by larger scale site lead in times and infrastructure improvement requirements).

Given the above it is evident that, as proposed, the employment site allocations fail to accord with the development strategy as they do not provide a range and choice of sites for new employment development sufficient to build upon the recent economic success of Newport, to tackle the low levels of self-containment in the sub-area and to recognise the role of Newport in the borough's economy. The proposed range of employment allocations in the Newport sub-area should therefore be extended to provide a choice of sites in terms of size, quality and location.

Question 46. Do the 'carried forward' employment allocations need to be included in the Plan for it to be sound?

For the Plan to be considered sound, only 'carried forward' employment land allocations should be included that benefit from an up-to-date assessment, which demonstrates that the allocation is suitable and deliverable for inclusion in the new Plan when compared to reasonable alternatives.

When determining a site's suitability, consideration should be given to how the site accords with the latest planning policy framework, including the NPPF and the emerging Plan's development strategy. Assessment of deliverability should include consideration of whether a site is still available, how it is affected by constraints together with any mitigation measures required, whether the site is still viable and its likely capacity.

Only when a site is confirmed, via assessment, to be both suitable and deliverable for employment development within the Plan period and that no, more appropriate, alternative sites are available, will it be appropriate to carry forward the site into the new Plan.

Where a proposed 'carried forward' site's suitability and deliverability cannot be demonstrated, or where more appropriate sites are available for allocation, the site should not be allocated within the Plan and alternative provision should be identified.