

Hearing Statement: Matter 5

Telford and Wrekin Co-operative Council – Local Plan Examination

23 January 2026 | Confidential

Matter 5 – Allocations

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. As set out in our Hearing Statement, we do not consider that the Draft Local Plan is sound.

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

Appendix 15(C) – MU2 (Blue Willow Car Park) and MU3 (Lime Green Car Park)

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?

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Question 45: Do any of the proposed site allocations in Appendix 15 have specific requirements which should be set out in the Plan?

Response:

- 1.7 Sites MU2 (Blue Willow Car Park) and MU3 (Lime Green Car Park) are brownfield, under-utilised and sustainably located within the Town Centre boundary (on the edge of the PSA). They are sustainably located, being highly accessible to shops, services, amenities and public transport. Redevelopment will place new residents in walkable proximity to facilities, supporting the role and function of Telford Town Centre through increased footfall and linked trips. On this basis, the allocations are justified and fully aligned with the development strategy.
- 1.8 Both sites are deliverable and developable as they are in single ownership, unencumbered by material constraints, and centrally located with strong transport connections - making them inherently attractive for residential uses.
- 1.9 The indicative capacities for MU2 and MU3 need to ensure they are subject to a design-led approach. At Call-for-Sites stage, the Trustees' prepared initial capacity studies illustrating Town Centre uses at ground floor with residential above, with allowances made for parking etc. and an appropriate unit mix. While further refinement will occur through design development, these studies demonstrate a feasible envelope and we support the allocations and the set capacities.
- 1.10 The Council's Regulation 22 consultation statement records concerns regarding the "specificity or alteration to what uses will be permitted" for Appendix C Mixed Use Allocations, however, no changes were made to the policy on this point.
- 1.11 We support the Mixed-Use designation, though as per previous representations submitted, request that the draft Local Plan explicitly confirms the range of main town centre uses (as defined in national policy) appropriate for MU2 and MU3 - in particular retail, food & beverage and leisure, and complementary uses such as day nurseries - so that "estimated commercial / town centre uses" cannot be interpreted narrowly as "employment uses" to the detriment of viable, centre-first formats. The Local Plan as currently drafted (including Table 9's categorisation and the draft policies map) does not provide that clarity and in practice, risks an inaccurate interpretation of "employment uses" that could militate against viable, centre-first uses.
- 1.12 We ask the Inspector to consider the suggested changes we have put forward previously and provide clarity to the Site Allocations MU2 and MU3 that the intention of these allocations is to bring forward retail, leisure and/or food and beverage uses, or other uses such as day nurseries that would be complementary rather than competing with the Primary Shopping Area.

Response to Main Issue Wordcount: 474

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