

**MATTER 5 (ALLOCATIONS) - ISSUE 1: WHETHER THE ALLOCATIONS AND THEIR REQUIREMENTS ARE JUSTIFIED, EFFECTIVE, AND CONSISTENT WITH NATIONAL POLICY**

(Site allocation EC1 - East of Dawley Road as per Telford and Wrekin Local Plan Review (LPR) submission version 2021-2041))

This statement responds to Matter 5, Issue 1, point 43 (relevant parts only) of ID04 (Inspectors' MIQs). This statement concerns our client's (The Parkhill Group) site which is included within the Local Plan Review (LPR) as a draft allocation - allocation EC1 East of Dawley Road).

The relevant parts of point 43 include:

*“Are the site allocations in Appendix 15 justified? Do they accord with the development strategy? Are they deliverable/developable and supported by the evidence?”*

Each relevant part of point 43 is addressed in turn below.

**“Are the site allocations in Appendix 15 justified?”**

Yes, with regard to EC1 we believe the site allocation is justified. Para 36 of the NPPF (December 2024) clarifies that plans are sound if they meet a number of criteria. One of these criteria includes that they are 'justified'. 'Justified' is explained as "*an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.*"

With regard to background evidence, EHO3 (EHDNA, Part 1, October 2020 - para 0.20) has identified future employment needs. It identified two broad scenarios - labour demand and past trends. These two scenarios identified need for 167 and 189 hectares of employment land respectively and the range of 167 ha-189 ha was suggested as the most reasonable range of future employment land needs deemed to provide the most suitable range. The figure of 167 was taken forward as being considered more realistic as it accounts for levels of homeworking in the future (para 10.32). The 167 ha figure was adjusted to 169 ha prior to submission of the Local Plan to account for the change to the local plan period from up to 2040 to 2041, rolling forward the growth forecast which underpinned the employment land requirement. This identifies the need for future employment growth.

NPPF, para 72 requires Strategic policy-making authorities to have a clear understanding of land available in their area through the preparation of a SHLAA and to identify a sufficient supply and mix of sites, accounting for their availability, suitability and likely economic viability. AS01 (T&W Site Selection Technical Paper, March 2025) demonstrates that the site has been selected following appropriate methodology. This includes considering sites put forward through two separate calls for sites and the SHELAA process. A ten-stage methodology, adapted from an initial seven stages, to respond to Reg 18 consultation responses was then followed. The site selection process has followed assessment of the broad areas for growth being twin tracked with the site allocation process and para 4.1 of AS01 confirms, "*all sites have been assessed on best available info.*"

PD03 (Integrated Impact Assessment Non-Tech Summary, Jan 2025) proceeds to explain that all reasonable sites were assessed at multiple stages throughout the plan making process to help inform appraisal of options as well as to aid the decision-making process with regard to site allocations. It notes that this methodology has ensured a consistent approach was used to consider each individual site against a series of criteria which linked to the assessment framework and objectives. It states that the appraisal process considered the plan 'as a whole' i.e. the proposed strategy, including the site allocations and all of the supporting policies that will shape future development.

AS03 (T&W Employment Allocations - Site Assessments, April 2025 - pages 36-37) confirms there are no hard constraints identified on the site and concludes it is suitable, available and achievable.

In addition to the council's background evidence, our client has had discussions with a number of commercial agents (primarily Savills and JLL) on prospects for the site for commercial use and to determine the most appropriate mix of uses. Savills research confirmed that the site offers a significant opportunity to provide new commercial premises, best suited to Industrial or warehouse development, noting its potential to provide a large quantum of floorspace and its good connections to the strategic road network (SRN). A lot of the current available Industrial floorspace is old, failing to meet modern day needs, with demand strong and significantly outstripping supply. Parkhill has tested the market, marketing the site for future commercial/ warehousing and has had high levels of interest from potential blue-chip occupiers. Parkhill has been advised that there are over 40 industrial requirements which need satisfying within the borough.

Site allocation EC1 can therefore be concluded to be justified, having been robustly considered through an appropriate methodology with clear identification of its suitability to be brought forward.

**"Do they accord with the development strategy?"**

CD08 (T&W LPR submission version, Sept 2025 - page 24) states that the Development Strategy is to continue to plan development based on the areas of Telford, Newport and the rural area of the borough. In Telford, the majority of future growth is expected to be delivered in or on the edge of Telford through sustainable extensions to the urban area, recognising that growth beyond the existing boundary of Telford is critical to protecting the town's green spaces. Strategic Policy S3 (Economic delivery strategy) clearly sets out that employment will be supported and delivered by a number of different means - this includes "*allocation of new employment sites as shown on the Policies Map*". The policies map includes allocation EC1 as a new Strategic Employment Area (SEA). TW03 (Updated Employment Land Delivery Topic Paper, December 2025) confirms the SEA designation has been extended to certain areas to provide maximum protection for employment uses here. Para 6.20 of TW03 notes a significant amount of employment development is currently located to the north and east of Telford. The new employment allocation at EC1, alongside employment land within the SC3 form key allocations to help rebalance employment land in the west of Telford.

AS03 (page 32) notes that the site is “*adjacent to the built-up area of Telford so aligns with the growth strategy.*” The policies map (CD02) extends the ‘built up area’ to include the allocation, where it appears to provide a natural infill between existing development located to the north, south and east. AS03 goes on to note that it is “*well located to the strategic highway network*” with “*reasonable access to active travel routes and the railway station.*” Whilst AS03 identifies some highway concerns it notes that these can be addressed by design at the application stage. We agree with this point and set out some further information on highways in considering the deliverability/ developability of the site later.

Site allocation EC1 therefore accords with the development strategy.

**“Are they deliverable/developable and supported by the evidence?”**

With regard to deliverability, our client has confirmed through the earlier stages of the Local Plan review that it owns the site and that it is available for development. Our client has had initial pre-application discussions with the Council to agree a preferred access solution for the site - this has included two options (both of which propose accessing the site via a new junction at Arleston Lane/ Lawley Drive). The solution which provides a more direct route would require agreement to use part of the land to the approved development to the south<sup>1</sup>, and the other option utilises only land within our Client’s and highways’ ownership. Both options provide a feasible solution and further modelling work is taking place to agree which option is pursued. Both options would direct traffic directly out onto the main road (Lawley Drive) and up to the M54.

Parkhill Group has assessed the site for its proposed use as employment and has started to progress design options, taking into account technical matters such as ecology, topography and geotechnical (to name a few). The site offers a higher proportion of ancillary land (area beyond the proposed built footprint) than normal, which would suit logistics and/or Research and Development occupiers. Our client is confident that employment development on the site is viable and could be delivered within five years. Parkhill Group has considerable experience (over 35 years) in delivering sites previously used for opencast coal mining and remediating brownfield land.

In addition to the Council’s own background evidence identified above and AS03 which concludes the site is suitable, available and achievable, we explain some of the further work undertaken by our client to progress design and support a future planning application, which helps demonstrate the site’s deliverability/ developability.

An illustrative masterplan (figure 1) has been drawn up following the initial pre-application discussions with the Council which shows how a commercial development site footprint of approximately 7 hectares including associated HGV manoeuvring areas and car parking could be achieved. The layout has been informed by an Assessment for geotechnical risk by DCE services. This identified the area of higher risk ground conditions, where built development is less suitable, to be approximately 30m-100m wide around the site boundary. This area includes the former steep sided mined areas. However, the central area, although affected by below ground conditions is confirmed as more suitable to be built upon.

<sup>1</sup> Application ref: TWC/2025/0022 - Land off Arleston Lane (South side) – Outline planning application for up to 250 dwellings with all matters reserved.

The development layout proposes to make the most efficient use of the site by locating and aligning building footprints inside the perimeter and maximises the efficient use of the remaining land in the centre of the site. The proposed layout is organised to provide a level site for a single or multiple commercial units with minimal retaining walls. A HGV manoeuvring yard and parking is provided to the east of the site close to the access. HGV parking is provided to the south and office car parking to the north, albeit these could be reversed for a different configuration of commercial units.

It is proposed trees would be planted along the perimeter. The lower slopes will create a landscape transition to Ketley Brook and include linear swales for sustainable drainage linking to retention basins to manage runoff connecting to the existing Ketley Brook.

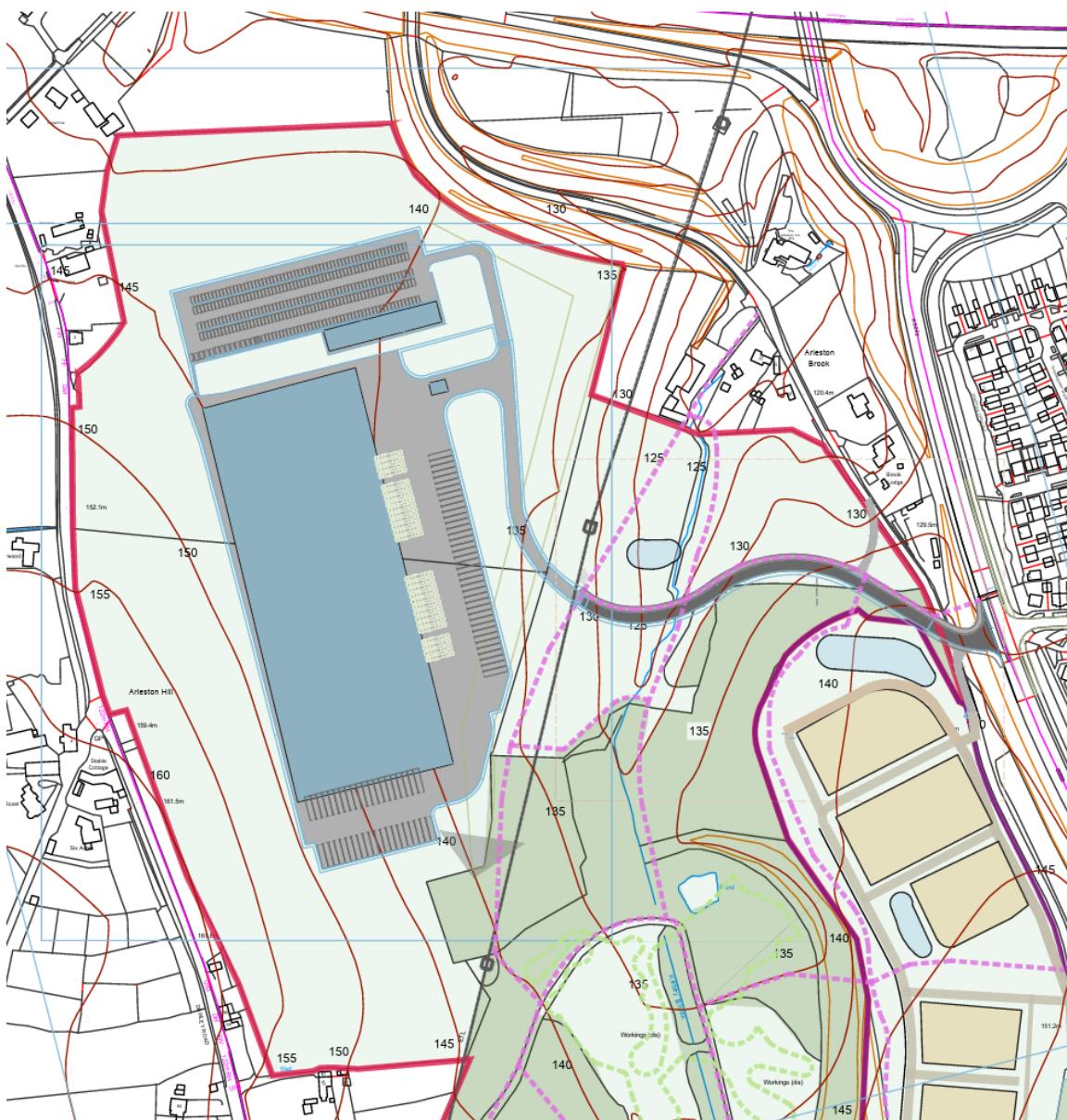


Figure 1: Illustrative masterplan

On highways, mode transport planning (mode) has reviewed the principle of vehicular access from the adjacent highways network and the sustainable access strategy that could be delivered, based on the assumption of a proposal of c.400,000sqft commercial/industrial floor space. This is to help provide assurance to the Local Highway Authority (LHA)/Local Planning Authority (LPA) that a scheme is deliverable on the site subject to a formal application being made.

Following pre-app discussions with both the LPA and LHA primarily discussing options for site access, further work by mode has focused on accessibility, access and internal layout, and impact.

Paragraph 110 of the NPPF states, *“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”*

With regard to above, consideration has been given to existing pedestrian, cycle, public transport facilities and surrounding nearby amenities to assess the sustainable credentials of the site and to demonstrate that there is a clear and genuine choice of transport for future staff/visitors (under the NPPF’s defined types of sustainable transport), other than reliance on single occupancy vehicular use.

The following figures provide further information on pedestrian, cycle, and public transport accessibility.

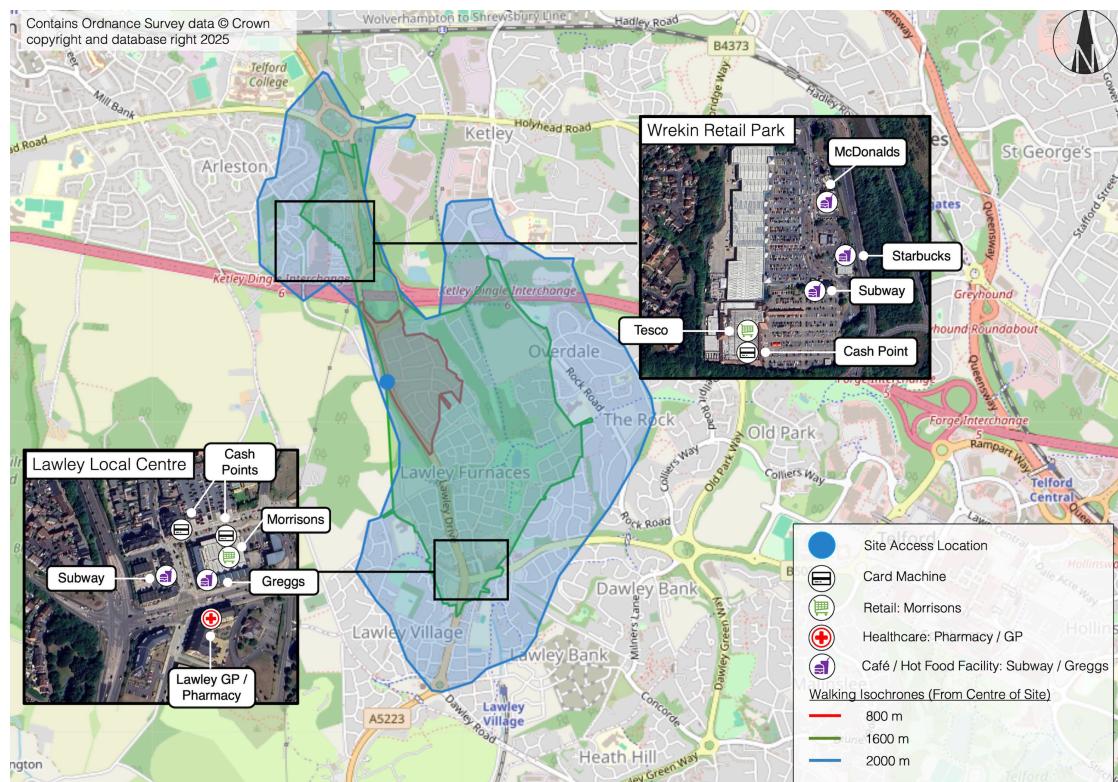


Figure 2: Pedestrian Isochrone Catchment



Figure 3: Pedestrian Infrastructure

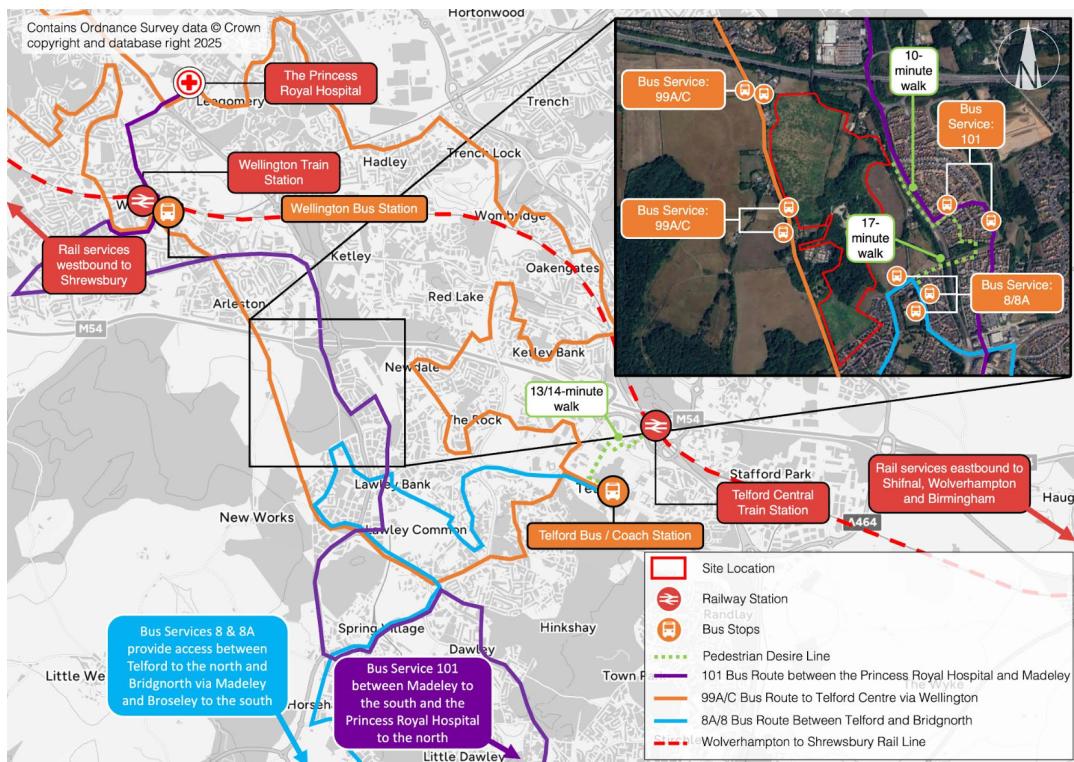


Figure 4: Bus Accessibility

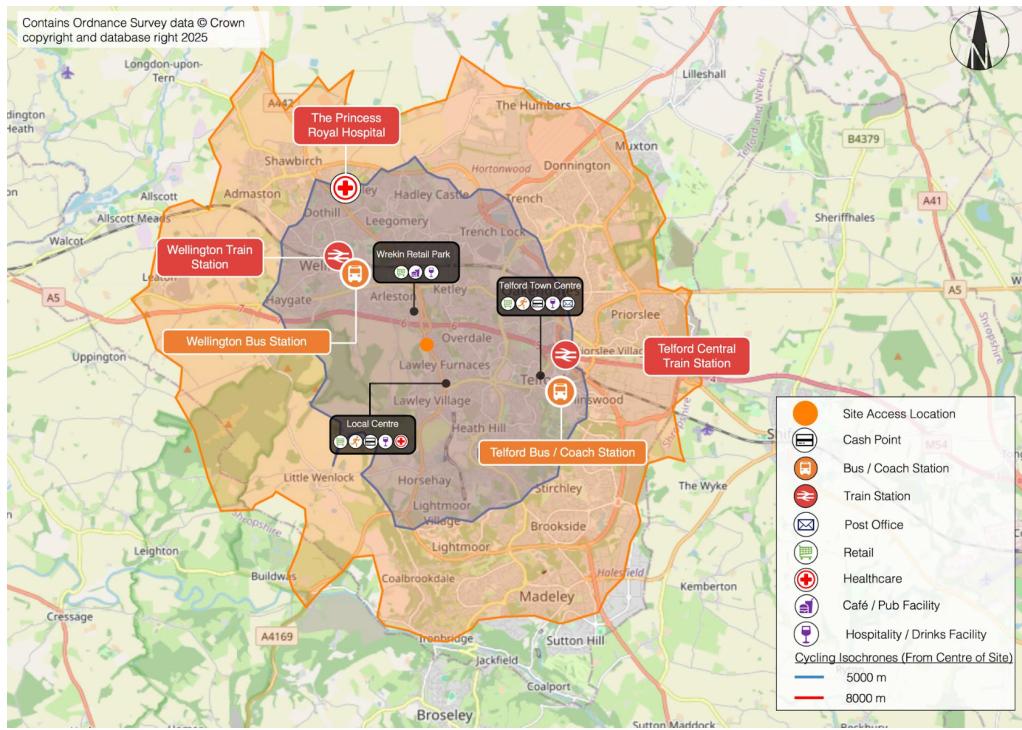


Figure 5: Cycle Isochrone Catchment

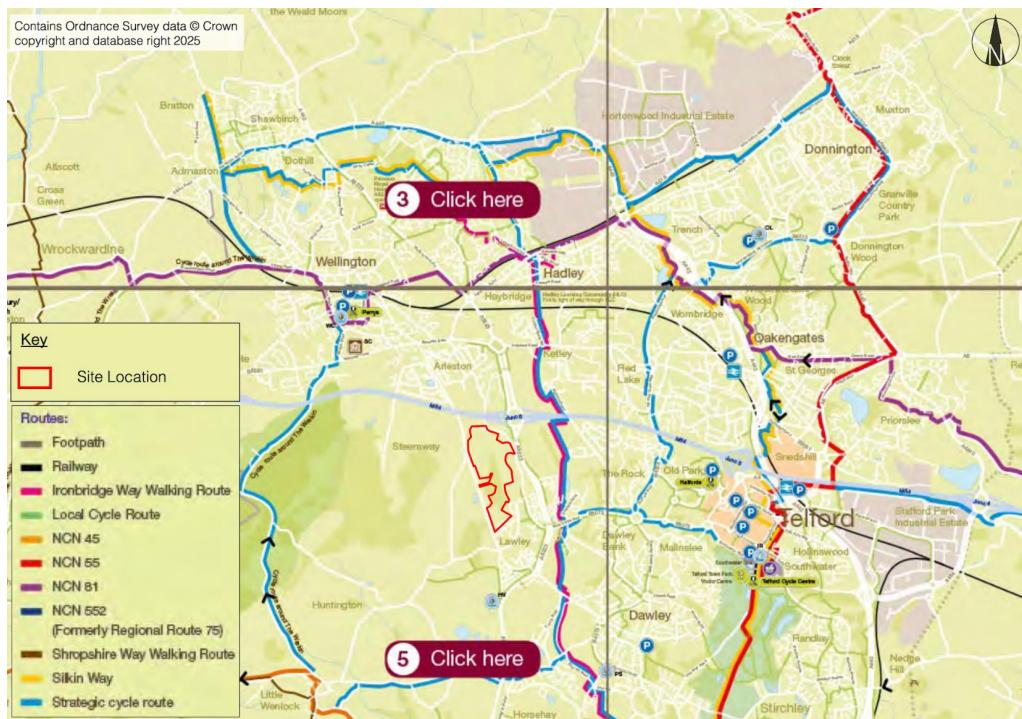


Figure 6: TWC Cycle Map Extract

An illustration of the key pedestrian infrastructure in the vicinity of the site (which will be utilised to access the site, infrastructure and public transport amenities) is in Figure 3, alongside the public transport and cycling routes shown in Figures 4 and 6 respectively. There is therefore a choice of transport opportunities for future staff/visitors on site (under the NPPF's defined types of sustainable transport).

The site is well located to an extensive local pedestrian network, with footways and shared foot/cycleway facilities permitting permeable and segregated trips to and from the site. Bus stops are located within a short walking distance of the site providing direct access into Telford Town Centre, Madeley and Bridgnorth and Wellington Train Station which enables onward journeys to key nearby major destinations in Shrewsbury to the West and Birmingham to the east.

Given the nature of the industrial/commercial use, access to the SRN is also a requirement and the location benefits from excellent connectivity to the M54 at Junction 6 with limited need to travel through the adjacent residential areas.

With regard to access and layout, the site benefits from direct frontage access with both Dawley Road and Arleston Lane along the western and eastern perimeter of the site respectively. In addition to this there is a significant amount of land under the control of the council (highways maintained at public expense) that extends further to Lawley Drive.

It is proposed to serve the site via a newly constructed access taken from Lawley Drive to the east of the site. This will require the current arrangement, a signalised T-junction between Lawley Drive/Birchfield Way, to be upgraded to a signalised crossroad arrangement. The exact form of this junction will be dictated by the results of the modelling from the Telford Strategic Transport Model (TSTM) but the current, draft access strategy has been designed prior to these results to provide a steer to both the LHA and National Highways as to the solution that will be explored. HGV access would be limited to Lawley Drive and would not travel through Lawley Village.

As explained earlier, the draft access strategy has focused on two initial options. These are included at Figures 7 and 8 below.

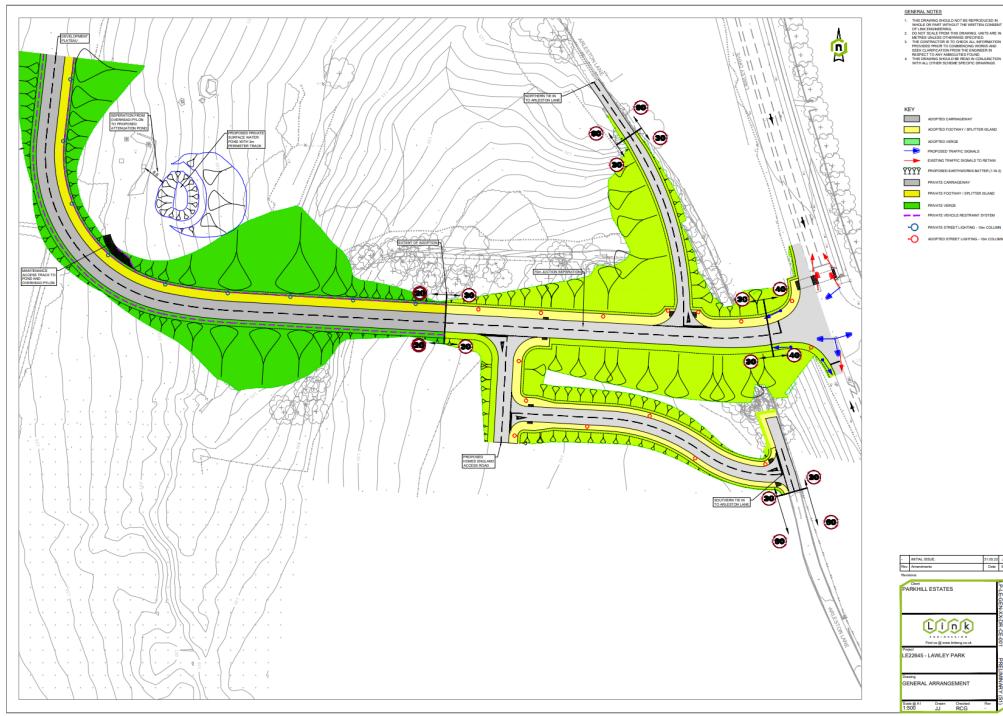


Figure 7: Access solution 1 (direct - involves agreement with developer to south - Homes England site)



Figure 8: Access solution 2 (curved access - utilising only client's and highways' land)

Both options involve breaking Arleston Lane (which is the preference of the LHA) to make it less attractive to 'rat-running'. Whilst both strategies would require removal of some trees, crossing of Ketley Brook and some regrading of land due to level changes, these are matters that will be addressed as part of any future planning application. At this stage it is Parkhill's preference to pursue access solution 1 - this also provides the ability to provide a primary access to the southern housing allocation. It should be noted that the exact nature of access to the Homes England application site is yet to be agreed via reserved matters. Opportunities to use part of Homes England's land are however being explored.

The exact form of the junction would be determined during the formal application with capacity assessments and through associated surveys that would be undertaken to demonstrate the suitability of the access. A review of the highway safety record has indicated that there have been no recorded accidents on the site frontage for the last 5 years. Both access options can be delivered with significant pedestrian and cycle infrastructure which can link into the existing provision in the vicinity of the site, and also through the scheme to the south.

In considering potential impact on highways, the wider and cumulative residual impact of the scheme would be assessed as part of the formal application stage. The access form will ultimately be guided by the results of the TSTM but there is sufficient land to deliver an appropriate access. Pedestrian/cycle links will also link into the bus network and routes adjacent to the site. There is also further possibility that existing bus services could be diverted into the site to assist with increasing accessibility. Any future scheme will be supported by a Travel Plan.

The above all confirms that the site is deliverable in transport and highways terms.

With regard to ecology, a Preliminary Ecological Appraisal (June 2025) by Wardell Armstrong for Parkhill Group has concluded that with further surveys and mitigation recommendations it should be possible for the proposed development to proceed in compliance with wildlife legislation and related planning policy.

With regard to landscape, PDP Associates has undertaken a desktop review of the baseline information identified in CD08. PDP's review concludes that NC02 (T&W Landscape Capacity Assessment, September 2023) confirms that the site has some capacity to accommodate development. PDP's review notes that the site is not located within a Strategic Landscape or the AONB and that the Wrekin Forest Strategic Landscape lies to the west of Dawley Road, adjoining the road corridor. It notes that NC02 confirms that the site does not form part of the visual and landscape setting of the Wrekin Forest Strategic Landscape and Shropshire Hills AONB. From this, PDP confirms it would be reasonable to assume there is no potential for adverse effects on the special qualities of the designated landscapes.

PDP also notes that the site is within a mineral safeguarding area - we can confirm that the minerals have been extracted and any mineral protection is therefore no longer relevant. PDP also confirms the site has been previously altered by changes in farm management, encroaching settlement and other urban development. Generally, the landscape in the immediate locality is more wooded than it would have been historically due to reclamation works and the introduction of a screening belt around the emerging settlement edge and along the highways. This greenery would not be affected by the development, with additional planting also proposed under any future application.

Through appropriate design and site layout, development on the allocated sites has the potential to satisfy the development guidelines set out in the Telford and Wrekin Landscape Capacity Assessment.

In conclusion, the site allocation is based on clear background evidence which has identified no hard constraints on site and it will help to rebalance employment land in the west of Telford. Parkhill has undertaken significant work to date to explore design options, informed by technical considerations, which provides assurance that a suitable option can be delivered. The high levels of market interest also provide confidence of securing a future occupier for the site.

**Total words: 2,997**