

Telford & Wrekin Council – Response to Matters, Issues and Questions

CONTENTS

Matter 6, Issue 2

Issue 2: Whether the development management policies on economy and centres are justified, effective and consistent with national policy.

Policy EC1 – Employment development in the urban area and SEAs

Q68. (a) Are the boundaries of the Strategic Employment Areas (SEAs) justified? (b) Do the SEAs need to be identified in the Plan for it to be sound?

The Strategic Employment Areas (SEAs) are listed in paragraph 8.6 of the Local Plan Submission Version CD08 and include Halesfield, Stafford Park, Hortonwood/MOD Donnington and Donnington Wood. The approach to employment development within the SEAs is clearly set out in Policy EC1. The boundaries of the SEAs are also identified on the Policies Map.

The boundaries of some of the Strategic Employment Areas (SEAs) have changed from the currently adopted position, as detailed in paragraph 6.16 of the Updated Employment Land Delivery Paper (December 2025) (TW03). These changes have been necessary to ensure that the boundaries of the SEAs remain justified.

The Council recognise that a modification to the plan may be required to provide a definitive list of all SEA area including Newport as well as newly allocated SEA areas SC3 at Wappenshall and site EC1 East of Dawley Road, located to the southwest of Junction 6 M54.

Q69. Use Class E includes various main town centre and community uses such as shops, food and drink uses, professional services, indoor sport and recreation, medical services and day nurseries. Are such uses supported in SEAs? If not, how will this be managed and is this clear?

As set out in Policy EC1, Strategic Employment Areas (SEAs) will be the focus for the delivery of employment land and employment-related development in the borough over the Plan period.

Development proposals for industrial (Use Class B2), and storage and distribution uses (Use Class B8) will be supported in SEAs, as set out in Policy EC1 paragraph 1(a).

Economic activities including business uses (E(g)(i), E(g)(ii) and E(g)(iii)) will be supported in SEAs where they support the function of the SEA; and they do not

undermine the viability of existing employment uses in close proximity to the site, as set out in Policy EC1 paragraph 1(b).

Other Class E uses would not be supported in the SEAs without clear justification to how it would support the function of the SEA, as set out in Policy EC1 paragraph 1(c).

It is acknowledged that changes of use within Class E and from Class E to C3 are currently permitted without the need for planning permission under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). It is therefore the intention that appropriate planning conditions would be added to permissions granted for new Class E uses within SEAs not currently subject to Article 4 Directions which place restrictions on the uses permitted and prevent conversion to Use Class C3 or other non-Class E(g) uses.

Changes of use will be monitored and Article 4 Directions to cover other SEAs (in addition to Halesfield, Hortonwood and Stafford Park which already have Article 4 Directions in place) may be introduced in the future, if required, to ensure that these sites remain a focus for employment-related activities.

Q70. For the policy to be sound, does it need to (a) protect military-related facilities within the North Telford SEA, and/or (b) manage the effect of development on the function and operation of SEAs, such as in relation to design quality, traffic and amenity impacts?

It is not the intention that Policy EC1 would restrict the development of defence-related activities at MOD Donnington, particularly those which are necessary to support operational defence and security. To clarify this position and ensure this policy is fully consistent with national policy, including paragraph 102(b) of the Framework, a further modification is therefore proposed which would insert the following criterion after 1(b):

*c) Development proposals for *sui generis* uses associated with operational defence and security at MOD Donnington will be supported.*

This modification will ensure Policy EC1 is sound and will not negatively impact the existing military operations at MOD Donnington, as reinforced by paragraph 8.12 in the Local Plan Review Submission Version (CD08).

The effect of development on the function and operation of SEAs, such as in relation to design quality, traffic and amenity impacts will be managed through the application of other policies within the Plan including Policy DD4 (Commercial and Industrial Design), Policy ST3 (Impact of Development on Highways), Policy S6 (Healthy, Stronger Communities) and Policy CC6 (Managing Air Quality) which would be applicable to all development proposed within the SEAs.

This is further supported by paragraph 8.11 in the Submission Version Local Plan (CD08) which states that *“All new development and proposals for change of use*

within SEAs must demonstrate that the proposed design, transport implications, and amenity impacts will not cause harm to the strategic function or day-to-day operation of the SEA both during construction and once operational”.

Q71. Are supporting paragraphs 8.9, 8.11 and 8.14 clear and effective in explaining the policy approach in SEAs?

Paragraph 8.9 in the Publication Version Local Plan (CD01) is clear and effective by stating that employment use in the context of Policy EC1 includes uses within classes B2 (general industrial), B8 (storage and distribution), and *sui generis* (i.e. uses associated with B use class activity such as waste management facilities). The reference to Class E within this paragraph should state Class E(g) only. It is suggested that a modification to clarify this be made to the Plan.

Paragraph 8.11 in the Publication Version Local Plan (CD01) states that alternative uses within SEA areas must demonstrate it is ancillary and complementary to the primary function of the SEA and should be restricted from any future changes of use without planning consent. This is important to ensure that retail and leisure uses continue to be directed to the hierarchy of centres identified in Policy EC4. Trade counters should be ancillary to an employment use on a strategic employment area.

Note that a modification to paragraph 8.11 is proposed in the Submission Version Local Plan (CD08) to remove the word ‘employment’ in the first sentence to clarify that this paragraph applies to applications for non-employment uses within SEA areas. Including this modification, this paragraph is considered to be clear and effective.

Paragraph 8.14 in the Publication Version Local Plan (CD01) states that Halesfield, Hortonwood and Stafford Park SEAs currently have Article 4 Directions in place to control the loss of employment land to other non-employment uses. Paragraph 8.14 goes on to clarify that further Article 4 Directions may be applied to other SEAs where necessary. This will be determined by ongoing monitoring of future losses.

Policy EC2 – Economic development in the Urban Area

Q72. (a) Are the marketing information requirements in paragraph 8.12 justified and effective? (b) Are they intended to apply only outside of SEAs and, if so, is that clear?

Paragraph 8.12 in the Publication Version Local Plan (CD01) sets out the marketing information that is required to support applications that involve loss of employment land. Modifications are proposed to paragraph 8.14 of the Submission Version Local Plan (CD08) to clarify that the length of period that should demonstrate that the site

has been marketed at an appropriate price, at a range of tenures and across a range of agents/websites.

For clarity the modification should be for a 'minimum' period of 12 months.

It is the Council's intention that the requirement to provide marketing information for applications involving the proposed loss of employment land would apply to any employment land outside of the SEAs within the urban area. This is because sites within the SEA areas are protected for B2, B8 and E (g) uses.

Policy EC3 – Employment in the Rural Area

Q73. Does the policy apply to land allocated as SCs? For the Plan to be effective, does this need to be made clear?

Policy EC3 is intended to apply to employment development proposals in the rural area, particularly those involving the re-use of redundant buildings, redevelopment of previously developed land, or expansion of existing rural businesses, together with limited support for well-designed new buildings in appropriate circumstances.

The Sustainable Communities (SCs) are strategic allocations and include specific policy requirements for the delivery of employment land within those allocations (Policy HO2). Employment uses within the SC allocations would therefore be expected to be considered primarily in accordance with Policy HO2 (and other relevant plan policies), rather than Policy EC3.

On this basis, the Council considers that Policy EC3 is not intended to apply to employment land delivered as part of the SC allocations, which are governed by their allocation policy framework.

In support of the above point the Policies Map (CD02) has clearly amended the urban boundary to include the Sustainable Communities sites, therefore they would (following adoption) be considered to form part of the urban area of Telford.

Q74. (a) Is the policy approach consistent with national policy on supporting a prosperous rural economy, including in relation to agriculture and other land-based rural businesses? (b) Does the Plan recognise the economic benefits of the best and most versatile agricultural land as required in Framework paragraph 187b?

(a) - Yes, the Council considers Policy EC3 is consistent with national policy objectives for supporting a prosperous rural economy. The policy supports rural employment development in principle, with a clear preference for the re-use and conversion of redundant buildings, the redevelopment of previously developed land, and the expansion/extension of existing businesses and employment uses. This provides a clear framework for directing rural employment development to the most appropriate locations and forms of development, and supports the diversification of the rural economy and enables rural businesses (including agricultural and other

land-based enterprises) to adapt and expand, whilst seeking to avoid unnecessary harm to rural character and highway safety.

The supporting text confirms that the policy is intended to support a broad rural economy and is not limited solely to traditional Use Class B employment, and recognises the role of land-based activity and rural enterprises in supporting rural communities (including reference to Harper Adams University and rural SMEs). This is consistent with the Framework's emphasis on enabling sustainable growth and expansion of rural businesses and supporting rural diversification.

Policy EC3 also directs proposals away from greenfield development in the first instance through its preference for re-use/conversion and previously developed land. Where proposals do not fall within those circumstances and involve a new building on greenfield land, the policy provides a clear basis for considering such development only where it is well-designed and meets the criteria in the policy (including demonstrating a rural need/diversification case, economic benefits, and no unacceptable impacts). This approach helps to limit impacts on the countryside and agricultural land, whilst still allowing appropriate rural economic development where justified.

(b) - However, paragraph 187(b) of the Framework refers specifically to recognising *“the economic and other benefits of the best and most versatile agricultural land”*. The Council's position is that this requirement is addressed through criterion 1 of Policy EC3 which directs proposals away from greenfield development in the first instance through its preference for re-use/conversion and previously developed land. If necessary for clarity and effectiveness, the Council could include an explicit cross-reference within Policy EC3 or its supporting text to the relevant Plan policy which addresses protection of soils and agricultural land quality, including best and most versatile agricultural land.

Q75. Is it necessary to include specific provision for development within the campus of Harper Adams University for the Plan to be sound?

The University's Regulation 19 representation requests that the submitted Plan reinstates the supportive wording included in the adopted Local Plan, namely that *“Appropriate development, as defined in Policy EC3, within the campus will be supported”*. The University considers this is necessary to support its strategy and emerging campus masterplanning work (CD11).

The Newport Employment Land Need Study recognises Harper Adams University as an important contributor to the Newport sub-area economy, and notes that employment growth has been *“mainly focused around Harper Adams University and the development of Ni.PARK”* (EH06). This provides supporting context for ensuring the Plan's economic strategy clearly supports appropriate development associated with the University.

The Council considers that it is not necessary to allocate additional land at Harper Adams University for the Plan to be sound. However, the Council agrees that the inclusion of a clear supportive policy statement in relation to appropriate development within the University campus would assist the effectiveness of the Plan and provide decision-taking clarity, particularly given that this specific wording has been requested through the Regulation 19 process by a key stakeholder (CD11). This can be addressed through a targeted modification/cross-reference to Policy EC3, without requiring a standalone allocation.

Policy EC4 – Waste management facilities

Q76. Is the wording of the policy and supporting text effective in safeguarding existing strategic recycling facilities in the Borough as recommended in the Council's Waste Study 2024 Update (WM02)?

Criterion b of Policy EC4 states clearly that any applications for change of use from waste management will need to demonstrate that the relevant waste capacity is no longer required. The supporting text states that applications for a change of use will need to provide evidence that the site has been marketed for a minimum period of 12 months for a similar or alternative waste use. The Council recognise the importance of protecting strategic waste management facilities and welcome any further suggestions on how this position could be strengthened.

Q77. Is the requirement to create new employment opportunities in part 1c justified and proportionate?

Where new waste management facilities come forward it is not unreasonable to have evidence of job creation / likely number of employees as this information aids the assessment of development proposals such as the need for parking provision / welfare facilities. The Council do however recognise that where existing facilities are altered or expanded there may, in some instances, be no additional employees and therefore no opportunity to create 'new employment opportunities. Therefore, the Council recognise the need for clarity regarding and proposed that new employment opportunities would only relate to new facilities and not alteration or expansion of existing facilities.

Q78. Is the policy effective in protecting existing waste management facilities, including wastewater treatment facilities, from the impact of nearby development?

In consultation with the Environment Agency a suggested modification (see document CD08) has been proposed to Part 3 of the policy that provides clarification regarding the protection of existing operational waste sites where development proposals within 250m of the site come forward.

In addition to the above suggested additional supporting text (agreed with the Environment Agency) has been proposed that sets out that any proposals within

800m of a Wastewater Treatment Works may require an odour assessment. The Council welcome the Inspectors view as to whether this should be included within the Policy.

Policy EC6 – Telford Town Centre

Q79. Is the Telford Town Centre boundary justified, including (a) land north of the A5 and (b) the Town Park south of the Primary Shopping Area (PSA)?

(a) - The Telford Town Centre Boundary is justified in including the land north of the A5. This area covers existing main town centre uses including retail, leisure, food and beverage units, a hotel and office accommodation. It also includes Telford Central Station and its car park which have been allocated as a mixed-use site expected to bring forward commercial development that would support the intensification to uses on the station site. The inclusion of this land is considered consistent with Policy EC6 as it supports the regeneration of land in the current adopted town centre boundary. As an example, part 1 of the policy encourages the diversification or activities and services which development could bring and part 2 supports proposals that supports active / sustainable travel, improvement of gateways into the centre (the railway station being gateway) and the enhancements to the vitality and viability of the centre area in general.

(b) - The inclusion of land south of the PSA is justified. This area is adjacent to Southwater and contains a significant number of leisure uses that complement the food and beverage offer in Southwater, as distinct from the more informal areas of the Town Park. This includes the Town Park visitors centre, Adventure Golf, High Ropes Course and Area. Improvement of these facilities would help reinforce the area as a destination and support the broader Telford Town Centre offer.

Q80. (a) The policy refers to the PSA, but the Policies Map identifies a Primary Centre Area. Will the policy be effective given this inconsistency? (b) Is differentiation of a PSA Secondary Frontage within the policy justified, effective and consistent with national policy?

(a) - The Council acknowledge the inconsistency and between references to the PSA and Primary Centre Area. For consistency the Council propose to modify the Policies Map to align with the Local Plan policy reference of Primary Shopping Area.

(b) - The Secondary Frontage is justified and effective and consistent with national policy. It provides an area within the PSA that supports *sui generis* uses alongside retail and leisure uses. This area has traditionally performed that role since the development of the town centre and helps to protect the PSA for retail and leisure provision, whilst providing an area that can accommodate, *sui generis* uses as part of a broader town centre mix.

Q81. (a) Is the meaning of “high-tech” in part 1b clear? (b) Is support for high-tech uses in the Town Centre justified? (c) If yes, does the policy need to make clear where in the Town Centre such uses will be supported, to be effective?

(a) - The Council recognise the move to a knowledge-based economy and that includes the use of technology (high-tech) and innovation in areas such as robotics and AI. An example of this approach has been the Quad building in the Station Quarter development. This includes the technology-based elements of Telford College and Harper Adams University in a town centre setting as well as providing incubation space for startup companies many of which operate in the technology sector.

(b) - Paragraph 90 a) states that plans should support the long-term vitality and viability of town centres, it goes on to state that it should allow them to grow and diversify. It is clear to the Council that to maintain the viability of the Telford Town Centre there needs to be a diversity of end users. Being open to and encouraging high-tech and R&D type uses that can be housed in office type accommodation will help diversify the centre, bring employment that can sustain retail, food and beverage and leisure used. These types of uses will also attract employees that will want to live and work in the centre helping to support the delivery of allocated mixed-use sites that could deliver residential accommodation.

(c) - Telford Town Centre is a relatively unconstrained location in that it does not have any designations such as conservation areas. The Council are therefore minded to take a flexible approach to the location of these uses, however if a more specific approach would provide clarity the area outside of the PSA (with its retail and leisure uses) and the area adjacent to Southwater south the PSA would be the Councils preferred location.

Q82. Is the term “existing gateways” in part 2d clear and unambiguous?

The Council consider key gateways to be flexible term and encompass key approach routes via highways, roundabouts and junctions or footways into the centre area. As an example, the highways that connect to each of the four corners of the ‘box road’ that surrounds the shopping centre are considered gateways to the ‘centre’. An example of key footways includes the route from Telford Central Station to the shopping centre, this has seen a new pedestrian bridge and is current subject to redevelopment as part of the Station Quarter scheme.

Q83. Is it necessary for small-scale residential development be supported in the Town Centre for the Plan to be sound?

The Council does not consider it necessary for the Plan’s soundness that small-scale residential development is explicitly supported in Telford Town Centre. Policy EC6 is drafted to support residential development in the Town Centre where it forms part of a *“major, comprehensive development appropriate to the location”*, and where it contributes positively to the vitality and viability of the centre. This approach reflects

the Council's objective of securing well-planned town centre living and avoiding piecemeal schemes that could lead to isolated residential pockets or poor integration with town centre uses.

The Town Centres Topic Paper (TW05) confirms that, due to the nature of Telford Town Centre (including large single-use sites), development at scale is preferable and the Local Plan therefore supports residential development as part of major, mixed-use schemes linked to the wider regeneration agenda and to maintaining and enhancing the Town Centre's vitality and viability. On this basis, the Council considers Policy EC6 is effective and justified in supporting residential development in the Town Centre in a coordinated and comprehensive manner. The Plan is not reliant on small-scale residential development in the Town Centre to be sound, and the policy approach appropriately balances regeneration objectives, town centre vitality and viability, and residential amenity considerations.

Q84. (a) What is meant by "multi-generational town centre living" in part 4b? (b) Is this requirement justified in the case of higher-density town centre development?

(a) - The Council recognise that the borough has an aging population and that requires planning for homes that can be adaptable to accommodate for the changing needs of residents. Given that Policy EC6 is setting criteria for residential development in Telford Town Centre this is an opportunity to create mixed multi-generational communities in a well-served (transport, retail, leisure etc.) accessible location. This could, for example, be through the provision of apartments that could be adaptable to changing life needs of residents.

(b) - The Council do however recognise that it may not be practical to secure specific 'multi-generational' provision as part of all proposals within the centre. Therefore, the Council has proposed a modification in document CD08 that provides a more flexible approach.

Policy EC9 – Out of centre and edge of centre development

Q85. Are references to the sequential test in the policy and supporting text consistent with national policy and guidance?

Yes. Policy EC9(1) applies a sequential test to proposals for main town centre uses located outside or on the edge of Telford Town Centre, the Market Towns, District Centres and Local Centres, supporting such proposals only where suitable sites within these centres cannot be identified through the sequential test. This is consistent with national policy, which requires a sequential approach directing main town centre uses to town centre locations first, then edge-of-centre, and only then out-of-centre locations (NPPF paragraph 91; PPG Reference ID: 2b-009-20190722).

The supporting text (paragraph 8.58) reinforces this approach by confirming that a sequential approach to site selection will be applied and that applicants must

demonstrate there are no other reasonable sites within or closer to centres that could accommodate the proposal. This aligns with national guidance that the sequential approach should be used to guide development to the most central locations first (PPG Reference ID: 2b-009-20190722).

Q86. (a) Are the locally set floorspace thresholds for Retail Impact Assessment (RIA) and the distance of 500m from town centre boundaries justified and consistent with national policy? (b) Is it necessary to require a RIA for proposals affecting existing out of centre retail units for the Plan to be sound?

Policy EC9 applies a sequential approach to main town centre uses outside or on the edge of centres, and then requires a Retail Impact Assessment (RIA) where a sequentially preferable site cannot be identified and the proposal meets the policy's trigger criteria.

In respect of national policy, paragraph 94 of the Framework confirms that local planning authorities should require an impact assessment for retail and leisure development outside town centres which is not in accordance with an up-to-date plan where development is over "*a proportionate, locally set floorspace threshold*". Accordingly, the principle of setting local thresholds in Policy EC9 is consistent with national policy.

Policy EC9 applies floorspace thresholds which vary by centre type (500sqm near Telford Town Centre; 300sqm near District Centres; and 200sqm near Local Centres). This approach reflects the Plan's hierarchy of centres and introduces a proportionate approach which acknowledges that smaller developments have the potential to generate significant adverse impacts in smaller centres.

The floorspace thresholds are derived from evidence set out in the Telford and Wrekin Retail and Leisure Capacity Study and Health Check (WYG, 2014) and in particular the recommendations outlined in paragraph 9.56, which states:

"For the three proposed town centres of Telford, Newport and Wellington (Level 1 and Level 2 of the proposed retail hierarchy), it is recommended that development proposals providing greater than 500 sq.m gross floorspace for retail, leisure or office uses in an edge or out-of-centre location should be the subject of an impact assessment. It is considered appropriate to reduce the threshold for Level 3 centres to 300 sq.m gross and around Level 4 centres to 200 sq.m gross. In our experience, it will only generally be development of a scale greater than these thresholds which will lead to a 'significant adverse' impact..."

These thresholds are in line with those contained in the currently adopted Local Plan and which are being effectively implemented for the purpose of development management decisions. Retaining these thresholds within the Local Plan Review is considered to be appropriate and in accordance with the Framework.

The Framework requires impact testing only for relevant proposals above a locally set floorspace threshold (paragraph 94), and paragraph 95 confirms that applications should be refused where they fail the sequential test or are likely to have significant adverse impacts. Policy EC9 follows this approach by requiring RIAs only where a sequentially preferable site cannot be identified and the proposal meets the policy's specific thresholds.

In respect of out of centre retail parks, in paragraph 8.38 of the Submission Version Local Plan (CD08) the Council acknowledges that "*out of centre retail parks such as those in Telford, Newport and Wellington contribute to meeting local shopping needs but does not seek to direct new development to these areas in the first instance so as to protect the vitality and viability of defined centres*". As such, it is the Council's intention that out of centre retail development above a certain threshold should require a RIA.

On that basis, the following modification is proposed to criterion 2 of Policy EC9 to ensure it is in accordance with paragraph 94 of the Framework:

"2. Where a suitable site cannot be identified through the sequential test, proposals for retail and leisure uses will require the submission of a Retail Impact Assessment where:

- a. The proposal provides a floorspace greater than 500 square metres gross; or*
- b. The proposal provides a floorspace greater than 300 square metres gross and is located in an edge of centre location within 500 metres of the boundary of a District Centre; or*
- c. The proposal provides a floorspace greater than 200 square metres gross and is located in an edge of centre location within 500 metres of a Local Centre.*

This requirement applies to proposals for floorspace above the thresholds specified, including through amalgamation, subdivision, creation of mezzanine floors and amendments to existing planning conditions.

Q87. Is evidence about, and monitoring of, town centre vitality and viability sufficient for the policy to be effective?

The Council considers that the evidence base and monitoring arrangements are sufficient for the policy to be effective, noting that the plan-led approach to town centre uses is principally implemented through development management decision-taking, including the sequential and impact test requirements.

The Council recognises that published monitoring of town centre vitality and viability has been more limited since 2022, with the Authority Monitoring Reports thereafter focusing primarily on housing monitoring. However, this does not undermine the effectiveness of the policy framework, as the key tools required to apply Policy EC6 and Policy EC9 (including the sequential test and, where relevant, the submission of

Retail Impact Assessments) are assessed at application stage using up-to-date, proposal-specific evidence.

The Council confirms that town centre monitoring will be strengthened moving forward, including the preparation and publication of updated monitoring information to support the assessment of vitality and viability across the hierarchy of centres. Monitoring will be captured in AMR's and in addition to the above include plan indicators, vacancy surveys, footfall data, town centre health checks and reviews of commercial market data. This will ensure that the Council can track trends in town centre performance and respond where necessary through plan review and/or supporting strategies.

On this basis, the Council considers that evidence and monitoring are sufficient to support the effective implementation of the Plan's town centre policies, and that planned improvements to monitoring arrangements will further strengthen the Council's ability to assess vitality and viability over the plan period.

Policy EC11 – Shopfront and advertisement design

Q88. Is the requirement to design proposals in accordance with guidance in a Supplementary Planning Document soundly based?

The Supplementary Planning Document (SPD) provides additional guidance for proposals for signage coming forward within conservation areas. The Borough has eight designated conservation areas (list in paragraph 13.28 document CD01) which reflects the unique and historic nature of a broad range of urban and rural locations, this includes the Ironbridge Gorge World Heritage Site. Therefore, the Council considers the requirement for applicants to design proposals in accordance with the SPD is soundly based, given their status as conservation areas.