

# Hearing Statement: Matter 6

**Telford and Wrekin Co-operative Council – Local Plan Examination**

23 January 2026 | Confidential

## Matter 6 – Development Management Policies

### 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 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)

**Question 68:** 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?

#### Response:

- 1.7 The Trustees support the boundaries of the Strategic Employment Areas ('SEAs') as detailed in previous Regulation 19 Representations submitted. In our view, the delineation is justified and effective, resulting in clear, legible boundaries that can be applied consistently in decision-making.

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1.8 Identification of SEAs within the draft Local Plan (and on the draft policies map) is necessary for soundness. It provides the certainty applicants and decision-makers require, focuses protection and intensification on genuinely strategic employment locations and underpins effective development management. A criteria-only approach, without mapped SEAs, would risk ambiguity, piecemeal erosion of the employment land supply and weaker delivery of the development strategy.

**Question 69:** 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?

**Question 70:** 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?

**Question 71:** Are supporting paragraphs 8.9, 8.11 and 8.14 clear and effective in explaining the policy approach in SEAs?

**Response:**

1.9 The Trustees welcome the amendments to Policy EC1 following Regulation 19 representations (as recorded in the Council's Regulation 22 statement) and consider that for policy to be sound it should manage the effect of development on the function and operation of SEAs, such as in relation to design quality, traffic and amenity impacts. However, outstanding matters remain before the policy can be found justified and effective.

1.10 Allowing main town centre uses within SEAs risks undermining both the strategic employment function of SEAs and the vitality and viability of town centres, creating potential conflict with other policies in the draft local plan. As drafted, Policy EC1 lacks sufficient clarity for applicants and decision-makers and does not provide a robust basis for consistent, effective decision-making.

1.11 The Trustees consider supporting text paragraph 8.10 should be amended for clarity to state unambiguously that the key focus for the SEA is for Class E (E(g)(i), E(g)(ii) and E(g)(iii)), with any other Class E uses limited to clearly ancillary provision. The policy and sub-text should seek clear and proportionate evidence that other Class E uses (E(a)-(f)) must be ancillary to the main use of a development site, or otherwise clearly ancillary to the SEA more broadly, and should only be allowed where evidence shows that the use supports the strategic role, function and sustainability of the SEA.

1.12 To safeguard the employment function, the draft Local Plan should introduce management mechanisms such as explicit floorspace caps or a percentage cap on floorspace for specific uses in the SEA (e.g. 10%); and planning conditions / obligations to prevent intensification, amalgamation or changes within Class E that would erode employment capacity and directly conflict with Telford Town Centre and its Primary Shopping Area. The Trustees urge the use of Article 4 Directions to remove relevant permitted development rights.

1.13 The above should be incorporated within the policy wording or through additional supporting text - so that the policy approach to SEAs is unambiguous for applicants and decision-makers. We request the Inspector to consider the amendments to policy previously submitted.

### Policy EC6 (Telford Town Centre)

**Question 79:** 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)?

**Question 80:** (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?

**Question 81:** (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?

**Question 82:** Is the term "existing gateways" in part 2d clear and unambiguous?

**Question 83:** Is it necessary for small-scale residential development be supported in the Town Centre for the Plan to be sound?

**Question 84:** (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?

**Response:**

1.14 The Trustees welcome the amendments to Policy EC6 following Regulation 19 representations (as recorded in the Council's Regulation 22 statement). However, outstanding matters remain before the policy can be found justified, effective and consistent with national policy.

1.15 We do not consider the Telford Town Centre boundary to be justified as it does not accurately reflect the functional extent of the Town Centre. The boundary extends beyond the Centre's functional area - particularly to land north of the A5 and to the Town Park south of the PSA; the inclusion of the Town Park serves no town-centre purpose and including land north of the A5 risks increasing the risk of Town Centre Uses coming forward in out of centre locations, very far from the Functional Town Centre and the PSA. The boundary should therefore be revised accordingly, shrunk to its smallest suitable limits, and we request the Inspector to consider the amendments previously submitted.

1.16 Furthermore, the interchangeable use of "Primary Shopping Area ('PSA')" and "Primary Centre Area" is unclear for applicants and decision-makers and creates uncertainty over what forms of development are acceptable, thereby undermining the policy's effectiveness. The term Primary Centre Area is not consistent with the NPPF language which is for Primary Shopping Area, and we request this is amended accordingly.

1.17 Additionally, the introduction of a "PSA Secondary Frontage" in Policy EC6 is not justified and is inconsistent with national policy, which requires identification of town centre and PSA boundaries only (NPPF para 90(b)). To be consistent with the NPPF, we request the term PSA Secondary Frontage is removed, and the area identified merged into the PSA more broadly. The Trustees do not see a benefit to creating the PSA Secondary Frontage and consider that terming it as the PSA would be a clear and effective approach.

1.18 Policy EC6 as drafted does not define "high-tech", nor does it provide examples or criteria to indicate which activities fall within scope. Nor does it set out where such uses would be appropriate - i.e. within the PSA or broader Town Centre - and on what terms. The support of "high-tech" uses within the Town Centre therefore cannot be considered justified as applicants and decision-makers cannot be certain what the policy supports and where it applies. As the main landowner of the PSA, the Trustees are unclear what this element of policy means for them, or how to navigate it.

1.19 As set out in our previous representations, and to enable intensification of the sector without undermining the Town Centre's primary retail, food & beverage and leisure functions, the draft Local Plan should direct "high-tech" uses to the Central Telford & Stafford Park SEA, creating opportunities for new markets in accordance with NPPF paragraph 90(c). If Town Centre / PSA-compatible "high-tech" formats are to be supported, the policy should state clearly where within the Town Centre they are appropriate - e.g., upper floors, with active ground floors safeguarded along primary routes - and where they are not appropriate. Without this, there is a risk of displacing core town-centre uses and eroding vitality.

1.20 The term "existing gateways" in part 2(d) is undefined and ambiguous. It is unclear whether this refers to transport interchanges, landmark junctions or specific entry points. Without a mapped definition or list, this clause is open to inconsistent interpretation by both applicants and decision makers. This approach is not clear or effective and is unjustified.

1.21 It is not considered necessary - for soundness - to confine support in the Town Centre to "small-scale" residential only. What is necessary is that the Plan supports town centre living in principle, whilst also having a clear regard to viability and deliverability. On that basis, we support Policy EC6's current wording (which does not limit support solely to "small-scale" residential development).

1.22 The term of "multi-generational town centre living" is undefined and therefore unclear, for effectiveness, the Plan should define this term. Telford Town Centre is a location where higher-density schemes, focused on 1- and 2-bed apartments, are considered appropriate. A proportion of 3-beds should be considered acceptable, however, due to the Town Centre location proposals should maximise unit numbers. Applied in this way, the "multi-generational" objective is met in practice - serving both early-stage households and downsizers. The Trustees support a mixed, balanced and genuinely multigenerational community in Telford Town Centre and seek to create a Town Centre that appeals to all.

1.23 As it stands, for the reasons outlined above it is our view that these policies are not sound as they are in part unclear and unjustified and it is requested the Inspector consider the amendments to policy previously submitted.

### Policy EC9 (Out of centre and edge of centre development)

**Question 85:** Are references to the sequential test in the policy and supporting text consistent with national policy and guidance?

**Question 86:** (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?

**Response:**

1.24 The Trustees welcome the amendments to Policy EC9 following Regulation 19 representations (as recorded in the Council's Regulation 22 statement).

1.25 However, as drafted, Policy EC9 is not fully consistent with the NPPF which requires the sequential test to apply to applications for main town centre uses (as defined within the NPPF and including retail, leisure and food & beverage) that are neither in an existing centre nor in accordance with an up-to-date plan, with proposals directed first to in-centre, then to edge-of-centre, and only then to out-of-centre locations where suitable sites are not available (or expected to become available within a reasonable period). There is a distinction made between retail and other main town centre uses which follows through into how the sequential test is undertaken. Specifically for retail, an edge of centre site is different to what could be considered edge of centre for an office. The Trustees consider that this distinction should be made more clearly in policy in order to be more accurately written and consistent with the NPPF.

- 1.26 The Trustees would welcome explicit acknowledgement of the town centre first principle i.e. main town centres uses should be located in a town centre, and only where there are no suitable and available sites in centre or edge of centre, can out of centre sites be considered. This would add strength to the policy wording and give more emphasis to the town centre first approach.
- 1.27 Additionally, Policy EC9 currently requires Retail Impact Assessments (RIAs) to consider an edge/out of centre proposal's impact and cumulative impacts and supports proposals where no significant adverse impact on vitality and viability is shown. To align fully with the NPPF, the policy should require RIAs to assess both: (a) the impact on existing, committed and planned public and private investment in a centre or centres within the catchment area of the proposal; and (b) the impact on town-centre vitality and viability, including local consumer choice and trade in the town centre and wider retail catchment, with the assessment proportionate to the scheme's scale and nature. For accuracy, the cross-reference should be updated from NPPF paragraph 90 to paragraph 94 of the current Framework.
- 1.28 To ensure consistency with the sequential test and to safeguard the function of Telford Town Centre in line with the retail hierarchy and national policy, Policy EC9 should make clear that any edge-of-centre or out-of-centre proposals for new retail development (within Class E) will be tightly managed so as not to undermine centre vitality. In addition to standard planning conditions or legal agreements, the policy should signpost proportionate management mechanisms, including: explicit floorspace caps; conditions/obligations preventing intensification, amalgamation/sub-division restrictions, or unrestricted changes within Class E that would increase impact on town centre retail and other uses. Where supported by evidence - the potential use of targeted, proportionate Article 4 Directions to withdraw relevant permitted development rights to avoid wholly unacceptable adverse impacts on Telford Town Centre could be introduced.
- 1.29 The Trustees support the principle of a locally-set RIA floorspace threshold in Policy EC9, however, we do not consider the 500 metre distance trigger to be consistent with national policy for retail development. NPPF Annex 2 defines edge-of-centre for retail purposes as locations well-connected to, and up to 300 metres from, the Primary Shopping Area; for other main town centre uses, it is within 300 metres of the town centre boundary. The 500 metre metric is associated with offices in relation to proximity to public transport interchanges, not retail. Policy EC9 should therefore align with the NPPF to be justified and consistent.
- 1.30 Finally, where RIAs are required, these should focus on the impact on Town Centres/the PSAs within the catchment area. Out of centre retail is not protected in policy terms and should not be. In terms of cumulative impact, the Trustees fully support the need for RIAs to consider the cumulative impact of out of centre retail and leisure developments on Telford Town Centre and PSA.

**Question 87:** Is evidence about, and monitoring of, town centre vitality and viability sufficient for the policy to be effective?

**Response:**

- 1.31 The current evidence submitted regarding town centre vitality and viability is not considered sufficient for Policy EC9 to be considered effective as drafted. At present 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.
- 1.32 Within the Town Centres Topic Paper (December 2025) the Council 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 the Council 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.
- 1.33 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.
- 1.34 To assist, we include a short note titled 'Telford Town Centre Topic Note January 2026' as part of the submission which 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: 2746****Important Notice**

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