

HEARING STATEMENT RESPONSE ON BEHALF OF BURHILL GROUP LIMITED

MATTER 6: DEVELOPMENT MANAGEMENT POLICIES

1.0 Response to Matter 6 – Development Management Policies

Issue 7 – Whether the policies for community infrastructure, culture and open space are positively prepared, justified, effective and consistent with national policy.

Policy CI4 – Leisure, culture and tourism

Q133. Is the policy consistent with the national policy, including Framework paragraph 88?

- 1.1 No, the policy is inconsistent with the wording of Framework paragraph 88 insofar as it is relevant to tourism development in rural areas.
- 1.2 Clause 5 of the policy text provides specific text on ‘other types of tourist accommodation’ that would not be relevant to major hotel accommodation within or immediately adjacent to Telford Town Centre under clause 4. Clause 5 states that *“the Council will expect applications for other types of tourist accommodation to demonstrate how they will broaden the range and quality of provision in the borough.”*
- 1.3 This stipulation appears to bring forward the same clause in the adopted local plan policy EC12 (leisure, cultural and tourism development), which was examined and adopted under the 2012 Framework. However, it does not appear to be consistent with paragraph 88 of the 2024 Framework which simply states that planning policies should *“enable sustainable rural tourism and leisure developments which respect the character of the countryside”*. The Framework is less prescriptive than policy CI4, so the wording of policy CI4 should be revised accordingly.

Q135. To be effective, is it necessary for the policy to (a) provide for cross-subsidy of leisure development through other uses such as residential; (b) seek developer contributions towards restoration of the Shrewsbury & Newport Canals; and/or (c) refer to ‘glamping’?

- 1.4 Our response to this question is in respect of parts (a) and (c).
 - 1.5 In response to part (a), yes, we consider that it is necessary for the policy to provide for cross-subsidy of leisure development through other uses such as residential, in appropriate instances.
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- 1.6 Notwithstanding the in-principle support the policy provides for the development of leisure facilities outside of Telford Town Centre at clause 3, there do not appear to be any mechanisms within the Plan that follow through on the Council's stated priority of maximising investment (Local Plan Priority 3, paragraph 3.6) by, inter alia, supporting the leisure and tourism sectors.
- 1.7 The Council's recent Annual Monitoring Reports¹ do not provide a clear picture on the extent to which leisure developments have been approved and implemented within the Borough during the lifetime of the adopted Local Plan. It is therefore unclear as to how effective the proposed policy will be in facilitating the delivery of leisure developments without provision for appropriate intervention, particularly private led schemes.
- 1.8 The Viability Assessment (document reference VS01) notes that the average prices in Telford & Wrekin are somewhat less than in most nearby authorities (paragraph 4.6). Indeed, this translates to lower development land values than in other higher value areas, particularly in the South of England. In the context of the leisure market, this limits the viability of a deliverable scheme without cross-subsidy. For context, Burhill Group Limited is the long-term landowner of the Shropshire Golf Centre and is committed to continually improving the facilities and offerings at the Club. Planning permission was secured in 2009 and renewed in 2012² for extensive new leisure/hospitality facilities at the Centre. The scheme included a new 50-bedroom hotel and spa, plus an indoor 25m swimming pool, gymnasium, fitness studio and restaurant. However, the scheme was not developed because it has not been viable to do so. Burhill recently commissioned research to assess the business case for growth and it has been established that there is renewed latent demand for fitness facilities at the Club. Accordingly, Burhill now aspires to create a "country club" offering at the Shropshire with the addition of pools, gyms and racquet sports. However, despite the beneficial economic, leisure, health wellbeing and tourism benefits such a scheme would bring to Telford, there is inherent risk in bringing it forward in the absence of viable cross-subsidising proposals.
- 1.9 In summary, the only way the proposed policy can be demonstrably effective in facilitating the delivery of leisure development, it is necessary for it to provide for cross-subsidy through other uses such as residential. We offer a form of amended wording under the heading below to make policy C14 sound.
- 1.10 In response to part (c), yes, it is necessary for the policy (and by extension the supporting text) to refer to glamping in order to be effective. Glamping has surged in popularity across the UK and we agree with the addition proposed by the Council in the Submission Version of the Plan (document reference CD08) which differentiates it from the other forms of accommodation specified in the supporting text at paragraph 12.34. This would ensure that the decision maker is unambiguous in the types of accommodation that could contribute towards the borough's competitiveness as a destination for tourism, as set out in paragraph 12.32 of the supporting text.

¹ [Telford & Wrekin Council | Annual Monitoring Report \(AMR\)](#)

² Application reference W/2009/0009, as renewed by TWC/2012/0936

Changes necessary to make Policy CI4 sound

- 1.11 Taking account of the above, our proposed amendments to the policy and supporting text are as follows. Proposed deletions are in ~~striketrough~~ and proposed new text is **italic underlined**:

Policy CI4: Leisure, cultural and tourism

Cultural and tourism development

1. The council will support development for new cultural, tourism and leisure (indoor and outdoor) activities (including ancillary development associated with these uses) and improvements to existing facilities where:
 - a) They are located in an accessible location within or adjacent to the borough's hierarchy of centres;
 - b) They include high quality design and public realm;
 - c) They are well connected via travel plans to secure links to walking and wheeling routes, electric vehicle charging infrastructure at destinations, public transport services, parking and visitor wayfinding; and
 - d) They encourage investment to improve the quality of the infrastructure for arts, sports, museums and leisure and provide opportunity for the creative economy to prosper.
2. Consideration will also be given to enhancing unique venues and the creation of new outdoor venues and activity centres near to key tourist destinations.
3. Elsewhere in the borough, the Council will support leisure (indoor and outdoor), cultural and tourism facilities (including ancillary development associated with these uses) provided it can be demonstrated that they cannot be accommodated in the borough's centres as well as complying with 1(b) and 1(c) above.
4. **Where appropriate, the Council will support proposals for cross-subsidy of leisure development through other uses such as residential.**

Tourist Accommodation

5. The council will support major hotel accommodation within or immediately adjacent to Telford Town Centre and the market towns of Newport and
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Wellington, or in other areas where exceptional circumstances can be demonstrated.

6. The council will enable sustainable rural tourism and leisure developments which respect the character of the countryside ~~expect applications for other types of tourist accommodation to demonstrate how they will broaden the range and quality of provision in the borough.~~ Applications will also need to demonstrate that any impacts, such as parking, and highway safety can be appropriately mitigated.
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