

Strategic Planning Team
Telford & Wrekin Council
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Date: 20th July 2026

Dear Madam / Sir,

Representations to the Main Modifications Consultation of the Telford & Wrekin Local Plan Examination

On behalf of Telford Trustees No.1 Ltd and Telford Trustees No.2 Ltd ('the Trustees'), Knight Frank hereby submit representations in respect of the Main Modifications Consultation of the emerging Telford & Wrekin Local Plan, which is running from 8th June to 20th July 2026.

Telford and Wrekin Council ('TWC') have been preparing a new Local Plan for several years. The Trustees submitted representations to the Regulation 19 Consultation which ran from March to May 2025. Subsequently, the Client attended and made representations at the Examination Hearing Sessions held during February and March 2026.

In June 2026, the Examination Inspector published a schedule of proposed Main Modifications ('MMs') and Additional Modifications ('AMs'). The Council are now consulting on these, which are proposed to secure the soundness of the new Local Plan.

The Trustees support the preparation of the new Local Plan and have worked constructively with TWC during its preparation. Within this representation we provide comments on a range of draft policies and their respective MMs against the tests of soundness.

Main Modifications

Paragraph 35 of the National Planning Policy Framework ('NPPF') (December 2024) which the Local Plan is being 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 places various duties on the Council including, but not limited to, ensuring the Plan is:

- Positively prepared – seeking to meet objectively assessed needs, including unmet needs from neighbouring areas where it is practical to do so;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, based on proportionate evidence;
- Effective – deliverable over its period and based on effective joint working on cross-boundary strategic matters; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.

If the emerging TWC Local Plan fails to accord with any of the above requirements, it is incapable of complying with the NPPF, which as a result of Section 19 of the Planning and Compulsory Act 2004, is a legal requirement.

Knight Frank



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Chapter 8 – Economy and Centres

Policy EC1 (Employment development in strategic employment areas (SEAs))

MM048. to MM050. The modifications which are proposed to Policy EC1 are broadly supported. The revised wording provides further protection to Town Centres from the steady increase and diversification of out of centre retail and leisure coming forward, as has been the case over recent years.

We welcome the clarification that retail and leisure uses are not acceptable unless they are demonstrably ancillary and complementary to the primary function of the SEA.

While we do recognise the introduction of text to confirm that mechanisms such as restrictive conditions and Article 4 Directions (where appropriate) may be used to restrict any future changes of use within Class E without planning permission; we continue to ask that Policy EC1 provides even stronger protections against the gradual encroachment of retail and leisure uses into the SEA. We continue to seek additional mechanisms such as a floorspace or percentage caps (e.g. 10%) to restrict retail / leisure floorspace; and/or an Article 4 Direction to prevent intensification, amalgamation or changes within Class E uses that would erode employment capacity and directly conflict with Telford Town Centre and its Primary Shopping Area.

Policy EC6 (Telford Town Centre)

MM059. to MM060. Our Clients welcome the proposed modifications which recognise the encouragement of Class E uses within the Town Centre (EC6 1a.); the removal of the reference to “multi-generational town centre living” (EC6 4b); the support for residential (EC6 4a) and the clarification of where the “existing gateways” are as referenced in EC6 Part 2(d), as these improve the overall clarity of the policy for applicants and decision-makers.

Notwithstanding, the lack of changes to the Town Centre Boundary is disappointing, for the reasons stated previously through the submitted Regulation 19 Hearing Statements and Hearing sessions. We remain of the view that the Policies Map should be updated to accurately reflect the functional extent of Telford Town Centre and to its smallest suitable limits, as the currently proposed boundary extends beyond the Centre’s functional area. The inclusion of land that is not within the Town Centre serves no town-centre purpose and increases the risk of Town Centre Uses coming forward in out of centre locations over time.

Further, to maintain consistency with national policy, the Primary Shopping Area (‘PSA’) Secondary Frontage should be termed as a PSA, as the current approach is inconsistent with national policy which requires identification of town centre and PSA boundaries only (NPPF Para. 90(b)). At the Hearings we confirmed there is no current evidence that this policy harms the town centre, but we maintain that this element of policy serves no real purpose and should be edited.

The proposed modified text set out at MM060 is welcomed.

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

MM061. to MM062. The proposed modifications to EC9 are welcomed.

EC6 part 4 should be amended to read *“the range of goods sold and/or the type of Class E use permitted **WILL BE** restricted either through planning conditions or legal agreement”* so as to ensure that even when out of town retail and leisure come forward at a moment in time, those facilities cannot expand or change without first reconsidering the impacts on the Town Centres. It should be made clear that in addition to the range of goods and type of E Class permitted being restricted, sub-divisions, amalgamation and extension will also be restricted.

This is to ensure protection of the Town Centres over time.

Chapter 15 – Appendix

Site Allocation References MU2 (Blue Willow Car Park) & MU3 (Lime Green Car Park)

MM132. While we recognise that this proposed modification includes a reference to “main town centre uses” on these allocations, we consider that additional clarity is required with respect to which uses this comprises, and whether there is a particular emphasis on retail, food and beverage and leisure uses, or complementary uses such as day nurseries, as we requested in our Client’s Regulation 19 and Hearing Statements.

Including an expanded definition of which town centre uses are acceptable, will enable the allocations to be considered justified and fully aligned with the development strategy, and therefore enable the Local Plan to be found ‘sound’.

Local Plan Monitoring Framework

We have not seen the final version of the monitoring section of the Plan. However, from recent correspondence with TWC Policy Officers we understand that the Council are currently working to finalise the monitoring framework and are looking to provide baseline figures in order to effectively monitor the Plan, which is welcomed.

As such, Officers requested that we provide the number of long-term vacant units within the Telford Town Centre PSA, which have been vacant for more than 6 months. The Trustees have confirmed that within the Centre, there are currently 19 vacant units (5 of which are within Hazeldine House).

We request that the final version of the monitoring framework is shared with us prior to the finalisation of the Local Plan, for our Client's review and comment.

Conclusion

The Trustees support the ongoing preparation of the new Local Plan and thank the Council for their collaboration during the examination.

The MMs are broadly accepted but there remain a limited number of additional amendments that we propose should be inserted into the Plan.

Should you have any queries or require further information at this stage, please feel free to contact Chris Benham

Yours faithfully,


Knight Frank LLP

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Date: 21 July 2026

Dear Madam / Sir

Supplementary Representations to the Main Modifications Consultation of the Telford & Wrekin Local Plan Examination

Following discussions with Telford and Wrekin Council ('TWC') Policy Officers, we have been asked to comment further on the monitoring framework under Modification Reference MM140 in respect to the Main Modifications Consultation on the emerging TWC Local Plan. These supplementary representations are submitted on behalf of Telford Trustees No.1 Ltd and Telford Trustees No.2 Ltd ('the Trustees') and should be considered alongside our previous representations dated 20th July 2026.

Chapter 15 – Appendix

New Appendix (L) Monitoring Framework

MM140. We welcome and agree with the inclusion of the Monitoring Framework prepared by the Council, as discussed during the Examination Hearings. This Framework will enable the effective monitoring of Telford Town Centre's "health", in accordance with relevant and up-to-date evidence. We welcome the inclusion of the majority of our suggested monitoring indicators.

However, we are disappointed that the suggested monitoring indicator "*Opening / Closure of national retailers*" has not been included within the Framework, as this is a good indicator of the overall vitality and viability of the Town Centre. Furthermore, given the levels of out-of-town centre retail coming forward elsewhere, we consider that this is an important indicator to monitor with respect to the Town Centre's "health".

In accordance with our previous Supplementary Hearing Statement, we request that monitoring indicator M119 is amended to explicitly include convenience goods within the list of active town centres, as there is a difference between convenience goods retail and other forms of retail such as comparison retail, and these uses should therefore also be monitored.

As noted in our previous representations, we request that the final version of the monitoring framework is shared with us prior to the finalisation of the Local Plan, for our Client's review and comment.

Conclusion

Should you have any queries or require further information, please feel free to contact Chris Benham

Yours faithfully,

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