

# Briefing Note



## Examination of Telford and Wrekin Local Plan 2011 – 2031: Hearing Statements

### Audley Avenue Business Park (AABP)

#### Matter 3: Development Strategy

**Question 1: Does the Local Plan plan positively for the development and infrastructure required in the area, in line with the presumption in favour of sustainable development set out in the Framework? [Inspector's note: The Council is also asked to consider whether the criteria-based approach set out in policy SP4 represents either duplication or potential confusion with other policies, both in the Local Plan and the Framework.]**

**Question 3: Are (1) the prioritisation of previously developed sites within Telford and Newport (policies SP1, SP2 and SP4), (2) the focus on the development of publically-owned land and (3) the approach to best and most versatile agricultural land (policies SP1-SP3) sufficiently justified and in line with national policy in the Framework?**

1. The Local Plan as drafted does not plan positively for the development and infrastructure required in the area. It is overly onerous and will restrict developers in bringing forward inward investment into the Borough. The policies are too prescriptive and inflexible and will inhibit the delivery of sustainable development. It is at conflict with paragraph 151 of the Framework which requires Local Plans to be prepared with the objective of contributing to the achievement of sustainable development. For example, policy ER 12 is unduly onerous. Developers should not include the need to address watercourses or riverside habitats unless there is a direct impact upon them.
2. The Sustainability Appraisal (June 2016) states that the Local Plan contains 65 policies that are broken down into sections. The restrictions contained and the number of policies is unnecessary and will not allow the Local Plan

to respond flexibly to changing circumstances (paragraph 153 of the NPPF).

3. The criteria based approach set out in policy SP4 duplicates for example, other policies in the plan. Particularly, criteria i) to xiii) are reflected in other policies and are unnecessary. This is not in accordance with the Framework's core planning principles, and paragraph 14. Reflecting the need for positive planning, the Policy should state:

*“The land will support sustainable development works any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against policies in this Plan as a whole, or where specific policies indicate that development should be restricted.”*

4. To ensure that the 'planning balance' supports sustainable development, the need for adverse impacts to significantly and demonstrably outweigh the benefits must be enshrined in policies in the Plan.
5. The allocation of Strategic Employment Areas in Newport is not justified and conflicts with the Framework. We address this issue further in Matter 4.