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Telford & Wrekin Council
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Telford
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By email

localplan@telford.gov.uk
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22 September 2017

Dear Ms Kelly

PROPOSED MAIN MODIFICATIONS TO EMERGING LOCAL PLAN

We write on behalf of our clients, Audley Avenue Business Park (AABP) to set out our comments on the Inspector's main modifications to the draft Telford and Wrekin Local Plan 2011 - 2031.

Firstly, we welcome the Inspector's change (MM18) to the South Newport Strategic Employment Area (SEA). The amended boundary of the SEA excludes our client's land from the designation, and properly reflects the planning history and actuality of the site.

In the light of this, we have agreed not to pursue our objection to the South Newport SEA, but given the correspondence from The Marches LEP (Document K28) confirming the need for public subsidy for this site, we continue to have concerns regarding the amount of new employment land designated in Newport. Given the need for public subsidy, we have seen no evidence to justify the allocation of the land south of the A518 as employment land under the reference E27. This site is also within the SEA.

We understand that The Marches LEP has agreed 'in principle' to fund infrastructure improvements to facilitate the delivery of an Innovation and Enterprise Park on the E27 site. Document K28, states that 'a full assessment' of the business case for the scheme has been undertaken. This document should form part of the Local Plan evidence base.

The information from the LEP states that the package could also 'kickstart' the 'delivery of more than 1,000 houses' in the 'Newport area'. It is imperative to the sound planning of Newport that the location of these houses is identified.

We also note from Document K14 that a planning application on this site was anticipated in the summer of 2017, and 2ha of the first phase will be delivered by 2018. We are not aware of any application being submitted.

Indeed, there is a significant quantum of employment space proposed opposite site E27, north of the A518. Application TWC/2011/0871 proposes to deliver 18,000

indigo.

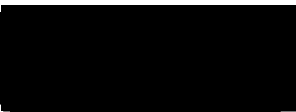
sqm of employment space within the build boundary of Newport and within the SEA. We understand from the Council that this scheme is 'a commitment' and planning consent will be delivered. As far as we are aware, there is no public subsidy associated with this scheme. A copy of the Masterplan for this scheme is attached.

In our view, it would be more appropriate to remove an unviable, unnecessary employment allocation outside the built up area. If, in the fullness of time, a need for more employment land (beyond that proposed north of the A518) arises, it can come forward in a review of the Plan.

In summary, the new evidence provided by The Marches LEP (Document K28) in respect allocation E27 and its need for public subsidy, and the statement that it will kickstart the delivery of 1,000 homes is concerning. These 1,000 houses have to be properly planned. For these reasons, the Plan is not justified and it is not sound.

If you require any further information, please let me know.

Yours sincerely

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Sean McGrath

M03 - Audley Avenue Business Park (AABP)

