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Fao. Emma Pierce-Jenkins

Your Ref:CTAAP/POR/213

Our Ref:GOWM/WPT/P5362LDF/54939

Date: 6/11/2007

Dear Emma,

Telford and Wrekin LDF
Central Telford Area Action Plan – Consultation on Preferred
Options 25 September – 6 November 2007.

I refer to your letter dated 24 September 2007 and associated documentation informing the Government Office that the Council was consulting on the Preferred Options for the Central Telford Area Action Plan DPD. I note that this is the second round of consultations and that they are being carried out in respect of a revised Preferred Options Report which has taken into account comments previously received, including those from Government Office. Briefly our concerns at that time were the lack of options, the lack of a clear evidence base, the need for a greater emphasis on spatial policies and the need to focus on outcomes and delivery.

We broadly support the emerging strategy for Central Telford with its primary aim of establishing a town centre as a focus for major housing, employment, retail, recreation, leisure, service and mixed use development to serve the needs of the Telford area and the sub-region. In particular there is support for locating a higher proportion of office development in the Town Centre or on the edge of the centre in accordance with national policy. We are also supportive of the approach to the provision of affordable housing. However you should be clear in the Submission document on the types of tenure to be provided. There are no particular concerns about the broad distribution of land uses which are being considered through the options process or the Council's preferences set out in the Preferred Options Report. We do however have

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some comments to make which are intended to help you in the preparation of the Submission DPD.

1. Evidence.

You will know that the appointed Inspector will be assessing the submitted AAP against the nine tests of soundness. One of the tests is the need for a DPD to be supported by a clear and robust evidence base (soundness test vii); you will need to ensure that you have all of the evidence base in place at the time of Submission. There are references in the Preferred Options Report to studies which are still to be completed.

2. Options.

We note that there is still only one “higher level” option being put forward. In order to meet test vii you will need to be satisfied that there are no other realistic options which should have been considered. This position will need to be justified through the Examination. It is noted that more specific options for sites are put forward in the character areas.

3. Spatial Development Issues.

The description of the area covered by the AAP and its issues, elements of which are repeated throughout the Report, needs to be much more succinct in the Submission DPD. There should be a spatial portrait, highlighting the key points and characteristics, for example, the lack of linkages between the sub-areas, the need to cater for the evening economy and the effect of the “Box Road”. The interrelationships also need to be considered and the consequential effects on issues such as regeneration. This should cut out the repetition and help to focus on the vision for Central Telford. It should also avoid a topic based approach which is characteristic of the basis for old style local plans.

4. Spatial Vision and Objectives.

The Vision should be more positive, setting out what Central Telford will be like at the end of the plan period. At present, it is still stating some of the issues and problems of the area. This should be done in the description. It is questionable whether each character area should have its own vision. In the Preferred Options Report the “local” visions do not set out what the areas will be like but set out one or two issues which should be taken into account in considering the appropriate form of development.

Linked to this the objectives could be reduced or combined. They should be less topic based and more spatially focussed. There is also a need to look closely at some of the objectives which may be more relevant to the Vision, for example Central Telford being an exemplar of high quality sustainable development.

5. Development Mix- Key Principles.

We have no particular concerns about the approach you have taken in considering the key principles and the character areas. However this has led to repetition, particularly in the descriptive parts of the Preferred Options Report. The Submission DPD will need to be much more focussed. The key principles section needs to be brought together so that it sets out a spatial strategy for Central Telford which provides the context for the more specific policies and allocations for the character areas.

In developing the strategy it will be important to take into account the contribution the Central Area can make to community safety and social cohesion. The needs of a diverse population should be taken into account. This should also be reflected in the Vision.

The strategy should be flexible in order to take account of changed circumstances in the future.

6. Delivery

The main areas of concern are delivery and monitoring. Whilst the Preferred Options Report is not a draft AAP, there should be more on delivery. There seems to be an element of an old style local plan approach in simply allocating sites and setting out a few development principles. The section of the Report dealing with delivery repeats some of the information set out in the sections on the character areas. The Submission AAP will need to include more about how the development proposals will be achieved and the roles of the key stakeholders including Transforming Telford, the Dawley and Malinslee Partnership, the Wrekin Housing Trust and various landowners as well as the Council. As part of the delivery framework, phasing will be important both in terms of the provision of infrastructure and the interrelationships between developments.

With regard to the provision of infrastructure there appears to be great dependency on the use of Planning Obligations. Are there any elements of infrastructure provision which will be provided for from mainstream spending programmes of either the key stakeholders or the Council? If so, these need to be clearly identified in the AAP.

There should be clear indications of where further details on development proposals need to be provided in the form of site level design briefs or master plans.

As you have stated in Appendix 3, there should be a clear monitoring framework for the AAP. This should include milestones, targets and indicators which are related to the achievement of the revision.

7. Other Points.

There is no need to repeat national policy which is set out in current PPGs and PPSs nor other policies contained within other DPDs prepared by the Council.

The Submission AAP should contain a clear statement of the extent of the area it covers together with a plan. This should help to avoid potential confusion between the Central Area and the Town Centre.

We hope that these comments will be of assistance to you in preparing the Submission AAP.

Yours sincerely

Mike Price

Senior Planning Manager