



**Telford & Wrekin**  
C O U N C I L

## **Borough of Telford and Wrekin - Local Development Framework**

### **Planning and Compulsory Purchase Act 2004**

#### **Central Telford Area Action Plan – Statement relating to representations made under the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 (Regulation 28)**

##### **(Regulation 30(1)(e) Statement)**

- 1.1 The Borough of Telford and Wrekin has prepared a Central Telford Area Action Plan (CTAAP), which covers an area that includes Telford Town Centre, Malinslee, Hollinswood, Central Park and Old Park contains the planning policies and proposals to support the development of the area. On adoption, the Area Action Plan will form part of the Council's Local Development Framework.
- 1.2 Copies of the publication version of CTAAP, and associated supporting documents, were available for inspection between 2<sup>nd</sup> June and 13<sup>th</sup> July 2009 (six weeks). This statement identifies the main issues raised by those representations made at this stage.
- 1.3 The Council received 371 representations from 69 respondents during the consultation period. Set out below is a brief overview of the main issues raised. Appendix 1 sets out the full schedule of issues covering each policy. Appendix 2 lists minor editing and typographical errors in the June 2009 Publication version identified by the Council. Certain amendments proposed in the representations received, that the Council would support should the Inspector be minded to agree, are also set out in Appendix 3.
- 1.4 Four responses were received outside the statutory period (see para 3.1 below).
- 1.5 A brief overview follows of the key issues raised through representations made:

## **Character Areas**

### Town Centre

- 2.1 Overall, there is support for regeneration of Town Centre, diversifying the mix of uses and the role Southwater could play in this. Some respondents comment that the redevelopment plans for the Town Centre should be supported by more detailed development/design principles indicating specific amounts and locations of uses. Whilst several representations support the provision of new retail at Southwater, some representations object to the retail development proposed at Southwater and its designation as a Primary Shopping Area extension.

### Old Park

- 2.2 Whilst some representations support new sports facilities on Old Park West (OP1), some question the need for such facilities and the effect this has on site capacity. Local residents raise concerns in relation to density, storey heights, character, access and parking issues in relation to Policy OP2a Park Lane. Certain legal issues are raised in relation to Policy OP2b The Crest. It is also suggested the proposed approach preventing retail development at Old Park East (Policy OP5) is too restrictive.

### Central Park

- 2.3 There is a need to be sure that sufficient justification exists to support the allocation of office floor space outside of the town centre (Policy CP1). Potential conflicts were seen between the site allocation and the biodiversity policy (CT19).

### Malinslee

- 2.4 There was considered to be insufficient evidence to justify the loss of playing fields at Langley St Leonard's School, Policy MA3.

### Hollinswood

- 2.5 It is suggested The land between the north of St Quentin Gate and the residential area of Deercote does not warrant designation as green space and has potential for housing development.

## **Policy Areas**

### Retail

- 2.6 Representations noted that the comparison retail allocation of 70,000 sq.m to 2016 exceeds the West Midlands Regional Spatial Strategy (RSS) Preferred Option figure of 50,000 sq.m to 2021/70,000 sq.m to 2026 and some representors raised concerns about impact of this on other centres in the region (it is worth noting on this point however that the West Midlands Regional Assembly have advised that the CTAAP is in general conformity with Phase 2 Review Preferred Option).

- 2.7 Whilst representations acknowledge that retail is being frontloaded in the period to 2016 to catalyse the regeneration of the Town Centre, some representors considered that the frontloading strategy is inadequately justified.
- 2.8 In terms of locations for retail, objections were raised to the proposed Primary Shopping Area extension and if there is sufficient capacity in the existing PSA to accommodate the identified retail need and it was contended that to extend it could have a negative impact on the existing PSA.
- 2.9 With regard to out of centre retail, some representors consider it is unrealistic to assume that no further retail development will occur at the Telford Bridge and Forge out of centre retail parks.

#### Employment

- 2.10 Representors commented that the quantum of employment land allocated represents a frontloading of all the RSS Phase 2 Review Preferred Option office allocation for the period to 2026 in the period to 2016 and that whilst the office allocations follow the sequential approach, some allocations are outside the Town Centre Core.

#### Transport

- 2.11 Representations noted that the delivery of the Box Road downgrading scheme and the Greyhound Link scheme are crucial to the successful implementation and phasing of new town centre car parking. In addition, representations seek clarification on the relationship between the location of the Bus Station and Southwater Square. Representations commented on the need for full public consultation on proposals for the Greyhound Link, specifically with regard to funding and phasing.

#### Housing

- 2.12 The Area Action Plan housing figure should not be presented as a total but rather be flexible in order to accommodate a potential higher housing requirement arising from RSS review phase 2. In addition, a percentage should be set for the affordable housing requirement.

#### Natural Environment

- 2.13 Concerns raised regarding the evidence base used to justify the approach to the designation of strategic biodiversity areas shown on Map 29. In addition, representations seek clarification on the relationship between the strategic biodiversity areas designations on Map 29 and the green spaces shown on Map 30 and the evidence base for the green spaces designation on Map 30.

### Delivery

- 2.14 Firm proposals including funding and phasing of Box Road improvements, Greyhound Link car parking and bus station required should be set out. Also, a location of car parking facilities, number of spaces and a phasing programme is should be set out.
- 2.15 The infrastructure schemes listed to be should be prioritised and phasing set out, with more evidence that funding is in place. The developer contributions policy should be more precise in order to clarify to developers the likely contributions that they will be asked to make and it is also suggested such an approach is unviable in Telford Town Centre at present. Issues also raised regarding impact of development on water resources and water quality.
- 3.1 As noted above 4 responses were received outside the statutory period.
- Network Rail noted new rights of access being created into the station or over Network Rail property will require Network Rail and Train Operating Company consent.
  - West Mercia Police wished to see additional references to policing issues and designing out crime added (referring particularly to the section concerning Southwater and the Design Principles Appendix); that cross reference made to the Council's Design for Community Safety SPD and requested better co-ordination with the Police Architectural liaison officer;
  - The British Horse Society requested inclusion of a plan showing bridleways and footpaths;
  - Lawley and Overdale Parish Council considered that Park Lane should not be reopened as a through Road; Old Park should be maintained as a distinct neighbourhood with its own character; and that brownfield sites should be developed first.

## Central Telford Area Action Plan – June 2009

### Summary of Main Issues Raised at Publication Stage

Policy Area/paragraph/section	Summary of comments
<b>General</b>	
	<ul style="list-style-type: none"> <li>• Environment Agency suggest further evidence is required to ensure policies are realistic and sustainable in terms of water resources and water quality and better linkage to relevant documents required (specific changes identified).</li> <li>• Mitigating against the effects of climate change should be addressed more explicitly.</li> <li>• Difficulties encountered with using the Council’s Limehouse consultation portal or accessing material on Council’s website.</li> </ul>
<b>Spatial Development Strategy</b>	
Vision (section 2.2)	<ul style="list-style-type: none"> <li>• The Vision should explicitly cover public services and should include policing, in order to better align with national guidance and the Core Strategy and provide a basis for seeking planning obligations (suggested text supplied).</li> <li>• Southwater is so significant to the regeneration of Telford Town Centre that it should be a vision theme on its own (suggested text supplied).</li> <li>• The Vision with regard to Southwater should emphasise the need for strong key uses at either end of the proposed east – west axis</li> </ul>
Para 2.5	<ul style="list-style-type: none"> <li>• Given the RSS Phase 2 Review is not yet completed, the overall housing figure for Telford and Wrekin may yet rise and therefore the CTAAP figure should not be presented as a total and should be flexible to accommodate potentially higher requirements.</li> </ul>

	<ul style="list-style-type: none"> <li>Given the position of RSS, remove the quantum's of homes, retail floorspace and office floorspace from the document.</li> </ul>
<b>Town Centre character Area</b>	
Overarching comments	<ul style="list-style-type: none"> <li>Important to plan for a wider range of leisure, community and cultural activities than just bars and restaurants</li> <li>Need to ensure approach to town centre development incorporates effective crime prevention measures and provides necessary supporting infrastructure</li> </ul>
Para 3.11	Housing in town centre should be predominantly mixed tenure one and two bedroom apartments above shops/offices.
Para 3.17 and 3.18	<ul style="list-style-type: none"> <li>Delete reference to 'major' in relation to east-west axis through Southwater and instead make reference to street encircling Shopping Centre being 'major' and Southwater Square should be referred to as 'a' primary urban space and focal point as opposed to the 'the'</li> <li>Along the E-W axis, at either end there is potential for larger grain development of strong/key uses and this is critical to generating footfall and making area attractive.</li> <li>Include the International Centre in list of significant origins and destinations at Para 3.18</li> </ul>
Map 4 and 5	<ul style="list-style-type: none"> <li>Amend so that boundary line between TC1b and TC1c follows the road which runs between the two Character Areas</li> </ul>
Policy TC1 – Town Centre Core	<ul style="list-style-type: none"> <li>The Town Centre Core should just be defined as the existing PSA.</li> <li>Need greater clarity on quantum and distribution of development and how proposals will be co-ordinated and delivered by the various delivery bodies</li> <li>Should be more reference to 'The Round' and further consideration of its implications for neighbouring businesses.</li> <li>Add bullet points to Policy TC1 to make reference to proposals making more efficient use of land, an improved skyline and establishing new and improved existing urban spaces at key locations.</li> <li>Remove reference to central street running through Southwater.</li> <li>Object to extension of PSA into West and Central Southwater – consider there is no need or justification for it and scale of retail development proposed at Southwater unclear.</li> <li>Coach Central is a barrier to connections between PSA and Southwater but no evidence of deliverability of plans to close it to through traffic.</li> </ul>

	<ul style="list-style-type: none"> <li>• No evidence of deliverability of B1(a) sites.</li> </ul>
Policy TC1a – Existing PSA (and supporting paras)	<ul style="list-style-type: none"> <li>• Barrier posed by night-time closure of shopping centre underestimated.</li> <li>• Policy could provide further clarity on its proposals e.g. specify in more detail how to improve connectivity of the PSA to its surroundings, form of Town Centre skyline.</li> </ul>
Policy TC1b – West Southwater (and supporting paras)	<ul style="list-style-type: none"> <li>• Unclear if it is a retail or a mixed use area.</li> <li>• Inadequate detail on retail proposals given e.g. floorspaces</li> <li>• Retail should be excluded from the use mix and focus should be on offices and residential</li> <li>• Should state in policy not supporting text that this forms part of PSA extension</li> <li>• Do not preclude single use proposals provided they contribute to the overall mixed use objectives for the area.</li> </ul>
Policy TC1c - Central Southwater (and supporting paras)	<ul style="list-style-type: none"> <li>• Unclear if it is a retail or mixed-use area. Consultee considers it should be a mixed use area.</li> <li>• Retail should be small scale.</li> <li>• A hotel use should be included in appropriate mix of uses</li> <li>• Make reference to connections between Central Southwater and East Southwater</li> <li>• Policy should set out a masterplan and design principles showing how development of this area will be delivered and arrangement of the proposed land uses</li> <li>• The Plan doesn't fully consider night time economy uses and their cumulative impact on crime, anti social behaviour and replacement of surface parking with multi storey parking.</li> <li>• Should state in policy that this forms part of PSA extension</li> </ul>
Policy TC2 – East Southwater	<ul style="list-style-type: none"> <li>• Respondents recognise that East Southwater, whilst being a gap area is a key linkage between Central Southwater and the Conference Quarter.</li> <li>• Policy does not add additional proposals to those in Policy TC1c and Policy TC3.</li> <li>• It should focus on improving connections between Central Southwater, Town Park and Conference Quarter.</li> <li>• Shouldn't be prescriptive about range of uses to allow for flexibility and note that car park has potential role to play in expansion of conference facilities, a new hotel and improved car parking.</li> <li>• Use range too narrow and there is a risk it could remain as a gap area – a hotel, employment and ancillary retailing should be included in the range of potential uses.</li> <li>• The Arena has the potential for Southwater Events Group related events such as open air exhibitions.</li> </ul>
Policy TC3 – Conference	<ul style="list-style-type: none"> <li>• Rename it 'The Events Quarter'.</li> </ul>

Quarter	<ul style="list-style-type: none"> <li>• Should recognise that is already an existing significant footfall generator as opposed to a potential generator</li> <li>• Concerned references to ancillary/small may preclude SEG’s hotel/office/bar expansion plans</li> <li>• Object to exclusion of retail and consider area has potential for niche/specialist retail</li> </ul>
Policy TC4 – Malinslee Link	<ul style="list-style-type: none"> <li>▪ Need to ensure the mining issues at the site can be addressed and review the phasing and capacity in light of this.</li> <li>▪ All of the site is green space/corridor and development will further threaten what is already a pinch point in the ecological/green network</li> <li>• Second bullet point of the policy regarding form of development and capacity of site is too prescriptive and inflexible</li> </ul>
Policy TC5 – Telford Urban Park	<ul style="list-style-type: none"> <li>• Refer to the Town Park Local Nature Reserve <ul style="list-style-type: none"> <li>• This area is adjacent to Southwater Lake and could make a positive contribution to redevelopment of Southwater. Resisting built development here at this stage could make this more difficult to achieve. Therefore reword policy to allow for built development on land south of the Lake where it contributes to wider environmental and community benefits. The land immediately adjacent to the lake encompassing Spout Farm House and play area could be excluded from the Character Area.</li> </ul> </li> </ul>
Policy TC6 – Civic Quarter	<ul style="list-style-type: none"> <li>• Policy TC6 should aim to improve connections to the Bridge and Forge Retail Parks</li> </ul>
Policy TC7 – Telford gateway	<ul style="list-style-type: none"> <li>• Increased parking in this area will not cater for the needs generated by Southwater</li> </ul>
<b>Old Park Character Area</b>	
3.3 Vision & Existing Characteristics	<ul style="list-style-type: none"> <li>• Representations question the objective to improve transport connections between Old Park and the town centre, and indeed whether development would deliver a ‘more people-friendly environment.’</li> <li>• Development also needs to respect the character of Old Park in terms of density and storey heights. <i>These concerns form the basis of many objections received to the Old Park character area.</i></li> </ul>
Policy OP1	<ul style="list-style-type: none"> <li>• Provision of sports facilities to serve new and existing communities (The Rock, Overdale, and Old Park) is</li> </ul>



Old Park West	<p>supported. However, other representations question the need for a sports facility and the effect this will have on site capacity.</p> <ul style="list-style-type: none"> <li>• Representations concerned that density is too high, and the potential effect of new development on the existing road network, and also question the delivery programme for the site.</li> <li>• Some comments seek resolution to existing problems caused by on-road parking along Colliers Way and nearby Thomas Telford School. Any new leisure facilities should also take into account potential impact on local residents.</li> </ul>
Policy OP2a Park Lane	<ul style="list-style-type: none"> <li>• Considerable level of concern expressed by Park Lane residents in relation to density, storey heights, character, access and parking.</li> <li>• Many representations question the wording in paragraph 3.66, stating that existing connections are sufficient and that the area is not detached from the town centre. Similarly, many representations suggest that Park Lane forms a village and that it should remain detached from surrounding areas.</li> <li>• Other representations seek a high quality design response by further reducing densities and ensuring that storey heights are no more than 2.5 storeys in order to compliment the existing character of Park Lane.</li> <li>• Highways issues raised, in particular the capacity of existing highway network to cope with future growth.</li> <li>• In addition, representations highlight lack of reference to geotechnical issues relating to the site, and a lack of delivery programme for the site.</li> </ul>
Policy OP2b The Crest	<ul style="list-style-type: none"> <li>• The main issue relating to this site is a legal matter raised by residents regarding private access arrangements, and potential vehicular access constraints due to narrow road width of The Crest. However, the landowner (Home and Communities Agency) are satisfied that it has the necessary legal rights to access this land for development.</li> <li>• Other representations question the proposed density, geotechnical issues, and also questions the delivery programme for the site.</li> </ul>
Policy OP3 Old Park Way	<ul style="list-style-type: none"> <li>• The main issues raised relating to this site concern geotechnical constraints, parking problems in the area, and concern regarding delivery.</li> </ul>
<b>Central Park Character Area</b>	
Policy CP1 Central Park	<ul style="list-style-type: none"> <li>• The main issues relating to this site concern the justification for office (B1a) uses in this location, the ability to deliver this amount of floor space, and potential conflict between the site allocation and Policy CT16 Biodiversity, and geotechnical concerns.</li> </ul>

Policy CP2 Telford Way	<ul style="list-style-type: none"> <li>The main issues raised relating to this site is the ability to deliver the amount of development, and geotechnical concerns</li> </ul>
Policy CP5 Land North of Priorslee Roundabout	<ul style="list-style-type: none"> <li>The main issues relating to this site is the potential conflict between the site allocation and Policy CT16 Biodiversity.</li> </ul>
Policy CP6 Holyhead Road	<ul style="list-style-type: none"> <li>The main issue relating to this site is the proposed density is considered too high.</li> </ul>
Policy OP5 Old Park East	<ul style="list-style-type: none"> <li>The main issue relating to this policy is the restriction imposed on future retail growth at the retail parks (The Forge and The Bridge).</li> </ul>
<b>Malinslee Character Area</b>	
Policy MA1 Park Road	<ul style="list-style-type: none"> <li>The main issues relating to this site concern development in close proximity to adjacent land uses, and geotechnical constraints.</li> </ul>
Policy MA3 Land at Langley & St. Leonard's School	<ul style="list-style-type: none"> <li>The main issue is whether there is sufficient justification for allocating this site for residential development.</li> </ul>
Policy MA4 Land at Church Road	<ul style="list-style-type: none"> <li>The main issue here is a legal covenant restricting the use of part of the site to open space.</li> </ul>
<b>Hollinswood Character Area</b>	
	<ul style="list-style-type: none"> <li>The land between the north of St Quentin Gate and the residential area of Deercote does not warrant designation as green space and has potential for housing development</li> </ul>
<b>Mixed Use</b>	
CT1 Mixed Use	<ul style="list-style-type: none"> <li>Representations to this policy seek clarification as to the circumstances where the policy would be applied, and suggest that the policy is too simplistic.</li> </ul>
<b>Retail</b>	
Policy CT 2	<ul style="list-style-type: none"> <li>Allocation of 70,000 sq. m comparison retail development to 2016 is not in accordance with RSS Preferred Option Policy PA12A and exceeds RSS retail allocation to 2021 of 50,000 sq.m gross. Suggested lack of</li> </ul>

	<p>evidence to show why a significant variation from RSS retail figure and not demonstrated that by exceeding RSS retail allocation there will be no impact on other centres within the region.</p> <ul style="list-style-type: none"> <li>• Retail need figures based on RSS Preferred Option housing figure. However number of homes identified in RSS may alter dependent on outcome of RSS EIP and this could have implications for retail need. CTAAP should allow for other levels of housing growth, to reflect uncertain outcome of RSS</li> <li>• A specific floorspace figure should not be identified in CTAAP retail policy prior to outcome of RSS EIP .Retail capacity in Council’s studies significantly higher than in RSS retail studies. Objector(s) consider that compared to RSS studies (WYG) do not take account of current market conditions and use too high a baseline turnover, expenditure growth rates and too low sales densities leading to unjustifiably high retail need being identified by WYG</li> <li>• No convenience retail figure specified in policy</li> <li>• The option of PSA extension was not included until publication of Pre-Submission consultation document.</li> <li>• Need to demonstrate more clearly how CT2’s proposals link into key development proposals such as ‘The Round’ and Southwater redevelopment.</li> <li>• Expansion of retailing will adversely affect the Borough Towns</li> </ul>
<p>Frontloading of retail capacity and phasing</p>	<ul style="list-style-type: none"> <li>• Frontloading of retail capacity not justified by evidence base.</li> <li>• Frontloading contrary to PPS6 and PPS4.</li> <li>• No phasing is given. PPS6 states should assess retail need in 5 year periods. Sequentially, PSA should be delivered first.</li> <li>• CTAAP approach doesn’t allow for monitoring or review of capacity and therefore threatens Town Centre and other centres in the region.</li> <li>• Lack of justification for frontloading retail. No evidence provided to substantiate view that developers rely on substantial amount of floorspace to deliver regeneration. Objector is of view regeneration should not just be retail led.</li> <li>• Frontloading of retail not deliverable in period to 2016 and does not take account of current economic conditions.</li> <li>• Frontloading retail when housing will potentially be back loaded (due to capacity for 26,500 homes not being demonstrated and current market conditions not being favourable) will undermine existing retail provision.</li> </ul>
<p>Proposed PSA extension</p>	<ul style="list-style-type: none"> <li>• PPS6 states that growth should be accommodated in existing centres where possible and where needed, a</li> </ul>

	<p>sequential approach should be adopted in identifying sites for further development. Objectors consider that there is no justification for PSA extension as is capacity within the existing PSA and therefore the proposal is contrary to PPS6.</p> <ul style="list-style-type: none"> <li>• West Southwater less sequentially preferable than Central Southwater.</li> <li>• PPS6 requires PSA extensions to be carefully integrated with existing PSA in terms of design and ease of pedestrian access but objector considers there to be poor links between existing PSA and proposed extension. Para 4.80 of CTAAP states Box Road downgrading is key to facilitating delivery of CTAAP but Table 5 states it won't be started until 2015 and therefore PSA wouldn't be able to be connected to the proposed PSA extension until after 2016 and this is not in accordance with PPS6 or PPS4.</li> <li>• No indication of floorspace split between PSA and PSA extension and no cap on floorspace in PSA extension</li> <li>• No cap is given on retail quantum in PSA extension and Council would have less control over outward movement from PSA to PSA extension. CTAAP approach could mean retailers could relocate to what is presently an edge of centre location without having to do an assessment of need, impact, and sequential approach</li> <li>• Telford Trustees No. 1 and No. 2 Ltd who own the land within the existing PSA refers to work being undertaken on their behalf by Benoy architects to develop a masterplan for their landholdings. Benoy's work shows gross capacity of 36,168 sq. m on Red Oak Car Park and 39,348 sq. m gross on Ash Grey Car park (both car parks are in existing PSA).</li> <li>• Impact of PSA extension and frontloading retail capacity hasn't been tested and this should be done with reference to PPS6 and draft PPS4.</li> <li>• Contrary to PPS6 to encourage retailers to move outside PSA where there are active investors and capacity within the existing centre. Extension of PSA would lead to number of vacant properties</li> <li>• Against PPS6 to encourage retailers to move outside PSA where there are active investors and capacity in existing centre. Extension of PSA would lead to number of vacant properties in PSA increasing and draw traders out of PSA reducing its vitality and viability.</li> </ul>
Out of Centre Retail	<ul style="list-style-type: none"> <li>• Should specify that sequential approach will be applied to both edge and out of centre proposals</li> <li>• Policies OP5 &amp; CT2 do not provide opportunity to consider proposals from existing retailers to expand their businesses. It should set out a series of tests to consider such proposals</li> <li>• Bridge and Forge Retail Parks are reasonably accessible to Town centre and should be considered to be edge of centre. CTAAP should provide a policy for assessing proposals at these locations and recognise</li> </ul>

	<p>scope to connect them better to the PSA.</p> <ul style="list-style-type: none"> <li>• Unrealistic to not allow growth at retail parks until 2026.</li> </ul>
<b>Employment</b>	
Policy CT3	<ul style="list-style-type: none"> <li>• Approach to allocating offices follows PPS6 sequential approach but concerned that some offices allocations are outside of Town Centre Core. Evidence needs to be provided to justify this approach.</li> <li>• Office allocation of 109,700 sq. m represents frontloading of all of the 110,000 sq. m offices identified in RSS Review Policy PA13A for the period 2006-2026. Concerned this approach may have detrimental affect on ability of Black Country centres to meet their own office needs</li> <li>• Make ref to infrastructure required to support growth</li> <li>• Unjustified to only have 109,700 sq. m office allocation in CTAAP given that RSS sets a lower limit of 110,000 sq. m and the Town Centre is a priority location for new offices</li> </ul>
<b>Housing</b>	
	<ul style="list-style-type: none"> <li>• Given the RSS Phase 2 Review is not yet completed the overall housing figure for Telford and Wrekin may rise and therefore the CTAAP figure should not be presented as a total and should be flexible to accommodate potential higher requirements</li> <li>• A percentage should be set for the level of affordable housing sought.</li> <li>• CT5A adds little to national policy and its is unclear how, in its application, the policy approach will vary across the CTAAP area. Given that the overall target for affordable housing and proposed tenure mix are not included in the plan, the Council's proposed interim approach to address these issues should be fully outlined and then how and when further guidance will be available in more detail.</li> <li>• Need to ensure that sites allocated for housing development are covered by required infrastructure and services.</li> </ul>
<b>Leisure Culture &amp; Tourism</b>	
	<ul style="list-style-type: none"> <li>• Policy CT6 to state locate development of such uses where can be supported by existing infrastructure / services or these can be easily expanded</li> <li>• Policy CT6 not consistent with TC3 which refers to small scale hotel development</li> <li>• Criteria of CT6 too stringent</li> <li>• Policy CT6 needs clear reference to conferencing / event related uses and hotels</li> </ul>

<b>Transport</b>	
	<ul style="list-style-type: none"> <li>• A clear delivery plan for Box Road improvements, Greyhound Link car parking and bus station is required as fundamental to planning of town centre. Box Road scheme details, funding and phasing are particularly central to Town Centre redevelopment. Lack of such detail here is inconsistent with Delivery Section.</li> <li>• Requiring new car parking to be multi storey is a legitimate longer term goal, but surface level parking should be allowed for until sufficient development comes forward in order to support multi storey facilities.</li> <li>• An overarching strategy for car parking including guidance on location of facilities, an indication of the number of spaces to be provided and a phasing programme is required.</li> <li>• Greyhound Link scheme should not be included or policy reworded to indicate that consultation on the scheme and consideration of alternatives are needed first.</li> <li>• Firm proposals for the relocation of the bus station should be set out.</li> <li>• Bus station should not become more remote from Southwater Square as this would be detrimental to ensuring accessibility of Southwater Square for a range of people.</li> <li>• Funding and phasing of Greyhound Link scheme must be set out.</li> </ul>
<b>The Built Environment</b>	
CT12 Design	<ul style="list-style-type: none"> <li>• Representations seek greater reference to associated supplementary planning documents and other design principles</li> </ul>
CT13 Density	<ul style="list-style-type: none"> <li>• Representation suggests density assumption for Old Park is too high.</li> </ul>
CT14 Public Realm	<ul style="list-style-type: none"> <li>• Representation seeks greater emphasis on community safety.</li> </ul>
<b>Biodiversity</b>	
CT16 Biodiversity	<ul style="list-style-type: none"> <li>• The main issue relates to the robustness of evidence base used to underpin the designation of Strategic Biodiversity Areas shown on Map 29. Other representations seek minor amendments to the policy wording.</li> </ul>
<b>Green Space</b>	
CT19 Protection of Green	<ul style="list-style-type: none"> <li>• The main issue relating to green space concerns the relationship between the Strategic Biodiversity Areas designations on Map 29 and the green spaces shown on Map 30 and the evidence base for the green spaces</li> </ul>

Space	designation on Map 30.
<b>Delivery</b>	<ul style="list-style-type: none"> <li>• Can the necessary level of funding for infrastructure be delivered?</li> <li>• Include specific reference to £51m joint capital funding scheme for town centre infrastructure set up between HCA, AWM and TWC and its timing. This reference is needed in order to provide evidence to investors that resources are available from the public sector for the required infrastructure improvements and to guide phasing of their developments.</li> <li>• Retention of library, Meeting Point House and the Ice Rink should be allowed for.</li> <li>• Status of the development statements should be made clear.</li> <li>• Proposed capacities of residential site allocations OP2a and OP2b are too high.</li> <li>• The approach to developer contributions must be consistent with Circular 05/2005 and relate to need arising from development.</li> <li>• Policy CT21 should be more precise in order to clarify to developers the likely contributions that they will be asked to make through planning obligations.</li> <li>• Bingo hall replacement should be added to list of schemes in Table 9.</li> <li>• The infrastructure schemes listed to be funded should be prioritised and need, cost, funding and phasing set out.</li> <li>• It is unclear if/how much development is appropriate in the absence of the key infrastructure schemes.</li> <li>• Scope of the proposed Developer Contributions SPD should be set out.</li> <li>• Developer contributions approach currently unviable in Telford Town Centre.</li> </ul>

## Appendix 2 Schedule of Proposed Amendments at Submission stage (Regulation 30)

### Typographical corrections / clarifications

Section/part of the Plan	Proposed Amendment
Paragraph 1.21	1.21 to read appendix “5” not appendix “#?”
Paragraph 3.17	In third bullet point replace “movement axis” with “central street”
Paragraph 3.18	In third bullet point replace east-west pedestrian axis” with “central street”
Paragraph 3.33	Replace “axis” with “central street”
Paragraph 3.37	Replace “high street” with “central street”
Paragraph 3.47	Insert additional sentence “With reference to development and floodrisk, the site lies fully in food zone 1 and development proposals should include appropriate measures to address vulnerability to flooding and mitigate the potential to increase floodrisk elsewhere” (this is standard text that appears in respect of all other housing allocation sites).
Policy TC4	In second bullet point replace “will be” with “is estimated to be”
Policy OP1	In second bullet point replace “will accommodate” with “is”
Paragraph 3.106	Amend 3.106 to read Church “Road” not Church “Lane”
Paragraph 3.64	Delete paragraph 3.64 which duplicates map 13 title



Paragraph 3.69	Delete paragraph 3.69 which duplicates Map 14 title
Paragraph 3.73	Delete paragraph 3.73 which duplicates Map 15 title
Paragraph 3.78	Delete paragraph 3.78 which duplicates Map 16 title
Map 22	Add policy designations under MA1, MA3, MA4 to Map 22.
Paragraph 3.125	Delete wording in paragraph 3.125 “ The area abuts the northern.... actually are.” in order to remove duplicate text already set in paragraphs 3.123 and 3.124.
Paragraph 4.32	Amend reference here to “Table 4” to read “ Table 11”
Paragraph 4.101	Delete wording “these being” from paragraph 4.101
Map 30	Map 30 label should be amended to read “Green spaces of identified value”
Paragraph 5.8	Amend final bullet point to read “Water, drainage and other utilities”.
Table 11: Implementation Framework	Amend policy reference “CT3 Jobs and Prosperity” to read “CT3 Employment”

Proposed amendments the Council would support were the Inspector minded to agree

Representation ID	Policy/paragraph	Proposed amendment	Council comment/suggested change
<b>Character Areas</b>			
CTAAPJUNE 0941	Paragraph 3.7	Suggest change to paragraph 3.7 to make reference to ground conditions etc, in line with PPG14	<p>Agree. Whilst, the Character Area policies do contain reference to ground stability issues it is helpful to clarify the Council's approach to important issues such as geotechnical constraints at an early stage.</p> <p>Amend second sentence of paragraph 3.7 to read:</p> <p><i>These would include, in particular, flood risk and ground conditions:</i></p> <p>Insert additional bullet points at end of paragraph:</p> <ul style="list-style-type: none"> <li>• <i>Development proposals should pay due regard to land stability and surface hazards resulting from past mining operations in the area.</i></li> <li>• <i>Where remnant shallow coal resources remain consideration should be given to prior extraction to ensure that development does not sterilise this valuable national resource, and prevents future land stability problems.</i></li> </ul>
CTAAPJUNE 0950	Paragraph 3.7	Add paragraph after 3.7 re. shallow coal resources.	Agree. Insert new paragraph as suggested in representation:

			<p><i>“Shallow coal resources are recorded in the Central Telford AAP area, in particular within the Old Park and Malinslee character areas. Development proposals in these areas could lead to the sterilisation of the mineral resource. Consideration should therefore be given to the extraction of any remnant shallow coal prior to development taking place, which would also enable the land to be stabilised and treated rather than the less sustainable option of attempting to grout fill any voids with the consequent sterilisation of the nation’s asset.”</i></p>
CTAAPJUNE 0340	Policy TC1	<p>Insert bullet points to Policy TC1 as follows:</p> <p>“</p> <ul style="list-style-type: none"> <li>• <i>Make more efficient use of land</i></li> <li>• <i>Create an improved town centre skyline</i></li> <li>• <i>Establish new and improved existing urban spaces at key locations”</i></li> </ul>	<p>Whilst the Council does not agree with other comments this representee has made on Policy TC1, the bullet points suggested in the proposed amendment column of this table are consistent with the objectives for the Town Centre Core and therefore could be added to Policy TC1. The bullet points detailed in proposed amendment column should be inserted between the 2<sup>nd</sup> and third bullet points of Policy TC1.</p>
CTAAPJUNE0 9229	Policy TC1c	<p>Bullet points 3 and 5 of Policy TC1c identify need for connections between West and East Southwater and the Conference Quarter but there is no mention of the need to improve connections between Central and East</p>	<p>The intention of bullet point 3 of Policy TC1c is to seek to establish a key pedestrian route which provides the primary east-west connection through Southwater. Such a street would run through East Southwater and the policy intention was not to suggest otherwise. Therefore amend bullet point 3 of Policy TC1c to state: “Provide a central street</p>

		Southwater	connecting the area to West Southwater, East Southwater and the Events Quarter”
CTAAPJUNE 09233	Policy TC3 – The Conference Quarter	Rename ‘The Events Quarter’	This is a logical amendment as it is reflective of the fact that this area hosts a wider range of events than just conferences. Change all other refs to Conference Quarter to Events Quarter.
CTAAPJUNE 09206, CTAAPJUNE 09236	Policy TC3	Unclear why policy should only provide for small scale hotel development when Para 3.45 states that provision of office and hotel development should be ancillary to its function as a conference venue	Agree. The second bullet point of Policy TC3 mentions hotel development and other types of uses. Whilst accepting that hotel development does not have to be limited to small scale, other uses referred to in this bullet point do need to be limited to a small scale ancillary to the area’s function as a conference venue. Therefore suggest separating second bullet point of policy into two bullet points to read as follows: <ul style="list-style-type: none"> <li>• <i>Incorporate a small element of office, bar and restaurant development on a scale ancillary to the area’s primary function as a conference venue.</i></li> <li>• <i>Incorporate hotel development</i></li> </ul>
CTAAPJUNE 09284	Policy CP1 Central Park	Need to be sure sufficient justification and evidence to support office development outside the town centre.	Accept that additional text would clarify the Council’s approach.  Insert following text into paragraph 3.89:  <i>“The site is located within 500 metres from Telford</i>

			<i>railway station, therefore complying with guidance set out in PPS6 Annex A (Table 2)."</i>
CTAAPJUNE 09289	Policy MA3 Land at Langley St Leonard's School	Delete site allocation.	Agree in part. Based on updated information obtained by the Development Plans team relating to the deliverability of new housing as part of this proposal, and in response to the representation made, it is appropriate to remove the housing element from Policy MA3.
<b>Policy Areas</b>			
CTAAPJUNE 09167	Paragraph 4.118	Add text to paragraph 4.118 making reference to 'priority' species.	Agree.  Amend final sentence of paragraph 4.118 to read:  <i>"...determine what impact they will have on priority and protected species and habitats".</i>
CTAAPJUNE 09166  CTAAPJUNE 0952	Policy CT16 Biodiversity	Add text 'ecological corridors' to first bullet point.  Add text to first bullet point of Policy CT16 'on...designated sites...'	Agree with both comments.  Amend first bullet point to read:  <i>"Provide ecological surveys to determine what impact the proposed development will have on existing designated habitats, ecological corridors, and on protected species in particular"</i>