

## **Telford and Wrekin Local Plan**

### **Examination in Public**

**15<sup>th</sup> – 24<sup>th</sup> November 2016**

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#### **Submission by Mr K Greetham**

on behalf of

#### **Southwater Event Group**

**(Comment ID's PUB267, PUB269, PUB270, PUB272,  
PUB273, PUB274 and PUB255)**

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#### **Comments in relation to Inspector's Matters, Issues and Questions Paper**

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#### **Matter 4 – Examination Session 22<sup>nd</sup> November 2016**

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- 1.1 The Southwater Event Group (SEG) own the Telford International Centre, a Conference, Exhibition and Event Centre, and three hotels, all of which are located within the Boundary of Telford Town Centre shown on Map 3 in the Submission Version of the Telford and Wrekin Local Plan 2011 – 2031. SEG also currently have a planning application for a further 100 bedroomed hotel with bar and restaurant facilities and a multi-storey car park, again within the Telford Town Centre Boundary, under consideration by the Borough Council.
- 1.2 The Telford International Centre is the sixth largest conference and exhibition centre in the Country. Around 450 jobs are directly supported by the Events at the Centre and a further 1,800 indirectly. It generates around £50M each year within the local economy.
- 1.3 SEG, then, is keen to see Telford, and in particular Telford Town Centre grow and diversify. If Telford, and especially the Town Centre, can become more attractive as a place for people to live, work and spend leisure time, more national and regional events will be attracted to the International Centre, and SEG's business will continue to grow.
- 1.4 The Council's aims for the development of the town and other centres, as expressed in Aim 1 and Table 2 in the Local Plan, which include supporting and enhancing the network of urban centres as the focus for local business, shopping, community facilities and residential development, are supported by SEG. Further, SEG believes that recognising Telford Town

Centre as the sub-regional centre for the Borough, and seeking to direct main town centre uses to the Town Centre (as indicated in Policy EC5) thereby expanding the leisure, tourism and business offer in the Town thus supporting Destination Telford, is also of critical importance to the Town and in turn their own prospects for future growth.

- 1.5 SEG made a number of comments on the Local Plan at the time of the Publication Version, and as a result, engaged in a series of discussions with the Council about the manner in which the Town, and in particular the Town Centre, might benefit from development and how that might also support the development of SEG's business interests. These discussions were constructive, and resulted in revisions to the Plan which have led to SEG being able to support the general direction for development in the Town Centre as expressed in Policy numbers EC4, EC5, EC8, EC9 and EC 12.
- 1.6 SEG wish to record their gratitude to the Council for allowing them the opportunity to engage in the discussions.
- 1.7 The Council's aim, then, of promoting the Town Centre and expanding the facilities available therein, is entirely in line with SEG's own aspirations for the Centre.
- 1.8 However, in direct response to the Local Plan Inspector's requests for further written comments on the Plan, and especially in respect of Matter 4 – Economy and Community, SEG would like to make the following comments. Notwithstanding the basic agreement on the principles of development in the Centre there are a number of detailed issues raised in the Inspector's Final Matters, Issues and Questions Paper that SEG believes could be revised in order to create a more favourable planning climate in which Town Centre growth could be fostered.
- 1.9 The comments are not made in the spirit of criticism of the Plan but, where there might be a question as to whether the policies concerned are compliant with national policy or may not be effective or justified, they represent suggestions as to how those issues might be addressed, and the better development of the Town Centre achieved.

## **2.1 Matter 4.3**

- 2.1.1 SEG supports the general principle of identifying Strategic Employment Areas. However, SEG is concerned about the limitations placed on the range of uses that are provided for in the Strategic Employment Areas (SEA's), and particularly the Central Area SEA shown on Map 2 in the Local Plan and on the accompanying Telford Town Centre Insert to the Proposals Map.
- 2.1.2 Policy EC1 indicates that the SEA's are expected to deliver B Use Classes along with 'similar industrial uses and ancillary uses.' Whilst not specifically saying so, the implication is that other uses in the Strategic Employment Areas would not be welcomed. If that is not the case, the matter should be made clear.
- 2.1.3 Class B uses comprise all forms of industrial operations, storage, offices and research establishments. Uses other than Class B uses may be significant employment generators – indeed, many employment generating uses do not fall within any Use Class specified in the Use Classes Order. There are many existing

users within the Strategic Employment Areas that are not Class B uses, showing the diversity of employment uses that now exists. In SEG's view there should be greater flexibility in the type of uses that will be permitted in the Strategic Employment Areas, and they should not be limited to Class B uses. The reason/justification for this limitation is not explained in the Plan.

- 2.1.4 Of special concern to SEG is the Central Area SEA. Part of this SEA is included within the Town Centre Boundary shown on Map 3. There appears to be, then, some conflict between Policy No's EC1 and EC5, as this area, which already contains a number of non-Class B users is, according to Policy EC1, expected to deliver Class B uses, while Policy EC5 indicates that it should be developed for Main Town Centre uses, which do not include industrial uses.
- 2.1.5 As the Policy stands The Plan does not sufficiently justify the range of employment users proposed and does not explain how this restriction would encourage the sustainable economic growth that the NPPF indicates the Government is committed to. The policy ought to be reworded so that it clearly accommodates both the SEA and the Town Centre designation.
- 2.1.6 To achieve this, it is suggested the Inspector might consider adding to the first paragraph of Policy EC1 so that it reads (addition in red):

"The Council recognises the importance of the strategic employment areas throughout the borough. The areas, as shown on Map 2 and the Policies Map, are expected to deliver B Use Classes along with similar industrial uses and ancillary uses, **as well as appropriate main town centre uses within that area also designated as Telford Town Centre.**"

### **3.1 Matter 4.4**

- 3.1.1 Matter 4.4(1) - Growth Assumptions.
- 3.1.2 As indicated above, SEG support the identification of the Telford Town Centre Boundary, and the Council's indication that main town centre uses will be directed to it. Further, that conference and exhibition businesses will be directed to the Conference and Exhibition Area.
- 3.1.3 SEG accept the growth assumptions as set out in Section 4.2 of the Plan. There is clearly, at present, a decline in certain sectors of retail activity, for various reasons, but that general decline is not to say that all retail sectors or all main town centre uses are in decline. Whilst, then, the overall retail growth assumptions are accepted, SEG do not believe that the Plan should not seek positive possibilities for town centre growth. A more flexible approach to the development of the Town Centre should be adopted.
- 3.1.4 Para. 4.2.1 of the Plan suggests that changing consumer behaviour, new forms of retailing and car based out of centre retail and leisure development have created challenges for the Town's centres, and that the centres will have to take on new roles that continue to respond to meet the needs of local people across the

borough while being resilient to economic change and changes in consumer behaviour. SEG agree with this, and suggest that this supports the idea of greater flexibility in the type and location of main town centre uses within the Town Centre, which would help the vitality and viability of the Town Centre.

- 3.1.5 The growth assumptions appear to have been based on the Telford and Wrekin Retail and Leisure Capacity Study and Health Check of February 2014 (prepared by White Young Green). This study forecasts a significant downturn in retail sales based on poor economic outlook and the effect of the internet. However, the report also says, at para. 9.29, that whilst it is not envisaged that there will be a need for major land allocations for future convenience goods provision based on current need/demand, there could well be proposals for smaller foodstores within or on the edge of established centres which seek to meet a qualitative need through improved consumer choice and competition. The report goes further and indicates in para. 9.30 that the Council should have in place a suitable management policy which seeks to focus future investment within and on the edge of established centres, thereby adding to the overall vitality and viability of the centre as a whole.
- 3.1.6 Whilst accepting that the identified downturn is a reality, SEG believe that a positive approach to the future planning of the Town Centre should be adopted, allowing main town centre uses on appropriate sites within the Town Centre Boundary, so as to properly accommodate any qualitative deficiencies in current or future provision. Policy EC5, indeed, begins by saying,

“The Council will support development that reinforces Telford Town Centre's role as a sub regional shopping centre, by directing main town centre uses to Telford Town Centre.”

However, Policy EC5 then goes on to list a number of limitations and possible restrictions that do not appear to provide the freedom that appear to be aimed at restricting the location of main town centre uses within the centre. SEG believe that such restrictions can hamper the development of the Town Centre as a destination that will cater for the town's occupants and as a draw to others in the sub-region. The nature of development that will be permitted in the town centre should be clearly spelled out in the policy.

- 3.2.1 Matter 4.4(2) - Hierarchy of Centres.
- 3.2.2 SEG supports the hierarchy of centres identified in Policy EC4, and believes them to be consistent with national policy. The Policy makes it clear that all main town centre uses will be focussed on centres named in the hierarchy.
- 3.3.1 Matter 4.4(3) - Market Towns and District Centres.
- 3.3.2 The limitations in Policy EC6 relate to the centres of the Market Towns and District Centres, and SEG has no comments to make.
- 3.4.1 Matter 4.4(4) - Impact Assessments.

- 3.4.2 Policy EC8 indicates that the Council will only support proposals for development (presumably development of main town centre uses) outside or on the edge of the Town Centre or the Market Towns or District Centres, where suitable sites within the centres cannot be identified by a sequential test. The issue of the need for a sequential test is not at all clear, and will be discussed under comments on Matter 4.5 below.
- 3.4.3 In relation to the Town Centre the policy says that, where a site within a centre cannot be identified, an impact assessment will be required where a proposal involves development of over 500 sq.m. The limit of 500 sq.m. appears to have been derived from the 2014 White Young Green Study. The assessment of 500 sq.m. appears to be based on potential growth rates up to 2023, where a small amount of additional requirement for floorspace has been calculated as being required.
- 3.4.4 The NPPF indicates that, in considering applications for retail, leisure and office development outside town centres, which are not in accordance with an up-to-date Local Plan, local thresholds for impact assessments may be adopted, but where a threshold is not specifically adopted the default position should be 2,500 sq.m. This, it should be noted, is for developments outside a Centre; it does not relate to development simply outside a Primary Shopping Area, or sites which are within a town centre boundary but more than 300m from the Primary Shopping Area (NPPF definition of edge of centre).
- 3.4.5 Policy EC8 applies the 500 sq.m. standard to edge of centre locations as well as out of centre locations, although there does not appear to be any justification in the WYG assessment for doing so.
- 3.4.6 SEG support the idea of restricting main town centre uses within a defined Centre, but within that Centre it is felt to be inappropriate to restrict where particular uses should locate (given that all other issues – traffic, for instance – are equal). Calculations of need for retail floorspace are notoriously difficult, and generally centre on quantitative assessments and pay less regard to qualitative assessments. The calculation to 2023 appears to be a quantitative assessment, and may well prove to be inaccurate.
- 3.4.7 500sq.m. is a very small floorspace for a town centre such as Telford, and SEG consider that it cannot be said with any certainty that this is an appropriate threshold, particularly in respect of edge of centre sites. SEG believe that, within the Town Centre Boundary, developments on the edge of the Centre but within the town centre boundary should not have to be supported by an impact assessment if the floorspace to be created is below the NPPF guideline of 2,500 sq.m.

#### **4.1 Matter 4.5**

- 4.1.1 Policy EC8 says that the Council will only support proposals for development outside or on the edge of Telford Town Centre, a Market Town, District or Local Centre where suitable sites within these centres cannot be identified through a sequential test.

- 4.1.2 Initially, that appears reasonable and in line with the NPPF which says that Local Planning Authorities should apply a sequential test to main town centre uses that are not in an existing centre and not in accordance with an up to date Local Plan. However, the NPPF does not include edge of centre sites in the category of locations where a sequential test would be required.
- 4.1.3 The Local Plan does not include a definition of 'edge of centre,' and so the definition in the NPPF seems to be most likely to be useful. This suggests a number of criteria for establishing what an edge of centre site is, and implies that edge of centre sites might be within the boundary of Town Centres that are established in Local Plans.
- 4.1.4 This, i.e. a sequential test, being required for edge of centre sites that are within town centre boundaries, is likely to cause confusion, and the adoption of this requirement in the Local Plan should need special justification. It is suggested that the Local Plan should conform to the NPPF and sequential tests should be reserved for proposals for development on land that lies outside designated town centres only.

27 October 2016.