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Ms T Kelly
 Programme Officer
 C/O Development Management
 Telford & Wrekin Council
 Wellington Civic Offices
 Telford
 TF2 2FH

8 February 2017

Dear Ms Kelly

**TELFORD AND WREKIN LOCAL PLAN EXAMINATION
 POLICY NO'S EC5 AND EC8**

On Wednesday 1 February 2017, the afternoon session of the Examination considered 'Economy and Community.' I addressed the Examination on behalf of the Southwater Event Group (SEG).

At that session a letter from Mr Chris Benham of G L Hearn Ltd was circulated. That letter proposed alterations to Policy EC8.

Mr Maher, for the Council, indicated at that session that he would consider possible further changes to those Policies that affect the town centre. SEG are grateful for that further consideration, but would like the Inspector to be aware of their views in respect of the alterations suggested by Mr Benham.

The revisions suggested by Mr Benham would, in SEG's view,

- i. Not be in the interests of the development, viability or vitality of Telford Town Centre,
- ii. Not support the development of the role of Telford as a sub-regional shopping centre (an aim set out in Policy No's SP1 and EC5), and
- iii. Not be in the interests of the residents of Telford.

Policy No's EC5 and EC8 appear to attempt to restrict retail development in Telford Town Centre to the Primary Shopping Area (PSA) only. Mr Benham's suggestions for revisions to Policy EC8 would reinforce that restriction, such that retail development outside the PSA would only be allowed where it could be specifically justified by a sequential test and impact assessment related to the PSA. Such restrictions will, in SEG's view, present an unnecessary and artificial restriction on the development of the town centre and prevent it from achieving its true potential. Further, the suggested wording would be in conflict with the National Planning Policy Framework (NPPF).

The suggested alterations indicate that there should be a restriction on Class A1 retail development which is located outside or on the edge of the PSA, unless supported through a sequential test. The NPPF indicates that the need for a sequential test is appropriate where proposals for main town centre uses (which includes retail) that are not in an existing centre, and that main town centre uses should be located in town centres (para. 24). The NPPF does not restrict town centre uses to PSA's only. Para 25 indicates that impact assessments may be appropriate where they involve applications for retail, leisure and office development outside of town centres. The NPPF does not indicate that this applies to edge of centre sites.

'Edge of Centre' is defined in Annex 2 to the NPPF as being, for retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. The definition does not relate, as Mr Benham's suggested alteration does, to sites that are outside or on the edge of the PSA.

The revision to Policy EC8 is clearly in conflict with the NPPF. But SEG's concern goes deeper than that. They believe that Telford Town Centre should be encouraged to develop. To do this, and to break out of the rigid current land use pattern, greater flexibility is needed rather than more restriction. In this way the town centre can better serve the needs of Telford's population and support its sub-regional status.

I would be grateful if you would forward this letter to the Inspector, the Council and any other appropriate interested party.

Yours sincerely

AP


Mr Keith Greetham
Chairman
Southwater Event Group