

Our Ref: 38/15

11 February 2017

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

Dear Ms Kelly

TELFORD AND WREKIN LOCAL PLAN EXAMINATION
POLICY EC5 AND EC8
SOUTHWATER EVENT GROUP

I write on behalf of the Southwater Event Group and following the discussion on Day 3 of the Examination which centred on the 'Economy and Community.' I would be grateful if you would place this letter before the Inspector so that he may take its contents into account when considering the town centre issues. You will be aware that Mr Greetham, on behalf of The Southwater Event Group (SEG), has already written to you concerning the letter submitted by G L Hearn Ltd which related to Policy EC8.

Mr Maher, for the Council, agreed to take another look at the town centre policy(ies) to see if SEG's concerns might be addressed. This letter is written to try to explain SEG's position in more detail in order that there is no misunderstanding about the way SEG hope to see the town centre develop.

As a starting point it should be said that SEG are wholly supportive of the Council's expressed desire to see the town centre grow and prosper, and of the Council's ambition to promote it as a sub-regional centre.

However, SEG do not believe that the policies that have been developed by the Council will allow or encourage the necessary development to take place. They are likely to stifle the growth of the centre rather than provide a springboard for success.

In particular, SEG feel that the restriction of retail development to the Primary Shopping Area (PSA) only, particularly if the amendment to policy EC8 suggested by G L Hearn Ltd should be incorporated into the Policy, will not create a vibrant Town Centre. The Shopping Centre is, indeed, closed from 6.00 most evenings, and does not open for trading until 9.00 the following day. This does not encourage customers to visit the town centre, and does not assist the other town centre users in the Southwater area in retaining visitors into the evening.

The rigid separation of uses that presently exists in the town centre does not help, and does not encourage the mix of uses and activities found in most town centres.

The NPPF seeks to ensure the vitality of town centres, and requires planning authorities to pursue policies that will support their viability and vitality. It does not indicate that policies should protect the private or commercial interests of one party against another.

A town centre is defined in the NPPF as an area which includes the PSA and areas that are predominantly occupied by main town centre uses within or adjacent to the PSA. A PSA is, according to the NPPF, 'a defined area where retail development is concentrated.' It does not indicate that the PSA is the only place in a town centre where retail development should be permitted, or that any main town centre use should be restricted in such a fashion.

It is apparent that Policy EC5 is far more restrictive than the NPPF envisaged with regard to the distribution of retail development, and the Plan does not contain specific justification for such restriction or explanation of the manner in which the Council believes the restriction will help the town centre fulfil its role as a sub-regional centre.

SEG are concerned, then, that the policy restriction that is contained in policy EC5 will harm rather than promote the town centre's ability to provide retail facilities that are appropriate to both serve the town's residents and promote the sub-regional status of the centre.

Policy EC8 says that the Council will only support proposals for development (presumably of main town centre uses) outside or on the edge of Telford Town Centre where suitable sites within the centre cannot be identified through a sequential test. However, by indicating in Policy EC5 that all new retail development, food and non-food, will be first directed to the PSA, there is an implication that such development will not be readily permitted elsewhere in the centre.

Local Plan para 4.2.5.3 indicates that the Council apply a sequential approach for retail development outside or on the edge of the centre. SEG are concerned that there is an implication in Policy EC8 and the following paragraphs that 'edge of centre' may be regarded as lying within the town centre and thus a sequential approach would be appropriate even for sites WITHIN the town centre. This cannot be the case, as para. 24 of the NPPF says that Local Planning Authorities should apply a sequential test to planning applications that are NOT IN an existing centre, and that main town centre uses (which includes retail) should be located in town centres (not only in PSA's) then in edge of centre locations and only then in out of centre sites. Para 24 does not indicate that a sequential approach is appropriate for development WITHIN a town centre. It would be helpful if the Local Plan was clear on this issue.

Finally, SEG are concerned about the overlap of the Central Area Strategic Employment Area (SEA) and the Town Centre designations, as shown on the Policies Map. Uses in the SEA's are intended to be limited to Class B uses, other similar industrial uses (which, it appears from the discussion on 1 February are sui generis uses) and ancillary uses (Policy EC1). If the SEA designation were to take precedence in this area it would significantly reduce the ability of the town centre to accommodate the development of main town centre uses. 'Main town centre uses' include Offices, which is a Class B use, and so the town centre need not lose its office employment base. But a number of Class B uses other than Class B1 might well not be

appropriate for a town centre location. The siting of a main town centre use in the town centre should not be jeopardised by an allocation that requires mainly industrial uses.

SEG are hoping to be able to discuss the above concerns with the Council over the next few days, and possibly develop a form of wording for Policies EC5 and EC8 that will be acceptable to both parties. No doubt the Council will be in touch with you as soon as possible on the matter.

Yours sincerely

Clive Roberts