



Mr Clive Roberts

Via email

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**Your Ref**: 38/15 **Date**: 24 April 2017

Dear Clive

## **Telford & Wrekin Local Plan**

Response to correspondence to inspector: Reference K27b

Thank you for forwarding to me a copy of your letter of 12 March 2017 which you sent to the programme officer. I am aware that Vincent Maher has met with Keith Greetham since you wrote your letter. I have given your letter and the discussion that took place at Vincent's meeting with Keith careful consideration and am now only able to respond to you.

I do not propose to respond to the points you make in your letter following the Examination in Public hearings (K24/18 and K24/19) except to reiterate that we have agreed to modify text to Policies EC1 and EC5 to refer to retail being located "in the first instance" within the Primary Shopping Area (PSA). We should both assume the inspector has heard a range of views, has examined the matter and will issue his report in due time. The inspector can recommend further modifications if he thinks them necessary for reasons of soundness.

As I see it, there are two outstanding and inter-related differences between us with regard to the future management of Telford town centre. First, you assert that, because the PSA is in one ownership, the town's "business model" does not provide a competitive offer for customers and the Local Plan policies for the town centre should acknowledge this. Secondly, it follows that the Local Plan should be more flexible in where it should promote more retail development including beyond the current proposed PSA. You do not support the compartmentalised approach for the town centre set out in the Local Plan.

I recognise that a large proportion, but not all, of the PSA within Telford town centre is in one ownership. National planning policy makes clear that Councils should designate a PSA and it is obvious that the PSA for Telford Town Centre must be focused on the Telford Shopping Centre. This is because of its size, its location vis-à-vis public transport connections and its previous

designation as such in previous development plans for the borough. The Council and LEP have invested significant sums in recent years around the PSA to make the town centre more pedestrian friendly as a way of improving its vitality and viability. As the town continues to mature and its population grows, it is important for the maturity of the town centre that its retail offer be strongly focused in and around the Shopping Centre to reduce the number of carborne journeys and long walks across an extended shopping area that currently detract from its character. We also need to put in place strategies to prevent retail spend being drawn away from the town centre to out of centre sites. If we were, for example, to promote two PSAs where only one currently exists or to loosen Policy EC5 such that it would allow retail anywhere within the town centre, these out-of-town centres might reasonably call themselves edge of centre for the purposes of retail assessment, drawing investment beyond the town centre. We would fail in our objective of making Telford Town Centre the heart of the community if we were to allow new retail development to be diluted in this way.

I have carefully considered your point that we should loosen the areas where new retail development should be promoted so that two competing landowners can offer inward investors a choice of sites. National policy for retail management is silent on land ownership and I consider that it would be unsound in planning terms to promote the type of competition you refer to given the obvious location for the PSA. Moreover, you may agree with me that it is in the interests of any retail operator of any standalone centre to promote a good mix of uses both to attract customers and keep a mix of retail operators in the centre. Not to do so would result in increased voids and the Shopping Centre losing custom to Shrewsbury and other centres in the West Midlands. Such an outcome would ultimately then impact on the success of the wider town centre including potentially the Conference and Exhibition Area.

As the local planning authority we are happy to discuss specific proposals you may have for any of your client's sites by way of pre-application discussions or to consider any applications on their merits.

Yours sincerely

Katherine Kynaston

Assistant Director: Business, Development & Employment