



Mr Clive Roberts
Kembertons

Katherine Kynaston

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Your Ref: 38/15

Our Ref: vm/corr/eip

Date: 3 March 2017

Dear Clive

**Re: Telford & Wrekin Local Plan
Policies EC1, EC5 and EC8**

Thanks for forwarding to Katherine Kynaston a copy of a letter you sent to the Programme Officer. Katherine has asked me to respond to you on her behalf.

I am pleased to know again that you support the Council's overall approach to the management of development within Telford Town Centre.

We have carefully considered your representations made at the Examination in Public, your letter of 11 February and the suggestions made by others who attended. We propose to offer modifications to the inspector next week which I attach.

In summary, they comprise the following:

- Amending Policy EC1 to make clear that "main town centre uses" will be supported within the parts of the Central Telford Strategic Employment Area that fall within the boundaries of Telford Town Centre. This amendment gives your client more flexibility around the types of uses the Council will promote. However, the Council does not consider that additional retail use should be promoted outside of the Primary Shopping Area **in the first instance** for two reasons. First, the evidence base (refreshed in January 2017) suggests there is not likely to be demand for extra retail use over the lifetime of the Local Plan; and, secondly, we consider it poor planning to promote more retail across the whole of the Telford Town Centre. The Town Centre is relatively large and split into a number of distinct precincts and uses. We are concerned that extensive amounts of new retail outside of the Primary Shopping Area would dilute the distinct offer of the town centre;

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- Confirming in the supporting text to Policy EC5 our preference for any extra retail development to be directed towards the Primary Shopping Area of Telford Town Centre in the first instance;
- Amending Policy EC8 to make clear to indicate how impact assessment tests will be applied.

As I see it, these modifications will give your client more flexibility about new uses on the Ramada site. The modifications do not rule out the possibility of new retail development being promoted outside of the primary shopping area but state clearly our preference in land use policy terms where it should go.

Ultimately, it is for the inspector to determine if our Local Plan is sound and to recommend modifications to address any potential unsoundness issues that arise.

Yours sincerely

A handwritten signature in black ink that reads "Vincent Maher". The signature is written in a cursive, slightly slanted style.

Vincent Maher
Strategic Planning Programme Manager
Development Management

Email: Vincent.Maher@telford.gov.uk

Cc: Mrs Tina Kelly, Programme Officer

Rep/ Action number	Page (Submission version with track changes)	Policy/ paragraph	Changes (additions <u>underlined and in bold</u> and deletions struck through)	Justification for change
K24/18	p.43	EC1	<p>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 <u>with sui generis uses associated with B Use Class activity such as waste management</u> with similar industrial uses and ancillary uses <u>that support the Strategic Employment Area.</u></p> <p><u>Within the Central Telford Strategic Employment Area, main town centre uses (except retail development) will also be encouraged on sites within the Telford Town Centre as shown in Policy EC5.</u></p>	<p>Modification proposed to clarify the term “similar industrial uses” and bring it into line with Policy ER7.</p> <p>Additional text for Central Telford SEA necessary to align part of the SEA in the Town Centre with NPPF advice on main town centre uses while protecting the primary shopping area</p>

	P48	4.2.2	<p>...the borough's future need for additional space or additional large stores in the food grocery sector is likely to be met by existing commitments.</p> <p><u>However in the event of further demand emerging for additional convenience floorspace the Council will support such proposals within the Primary Shopping Area (PSA) of Telford Town Centre in the first instance.</u></p>	Provides a more flexible appreciation of local policy should circumstances change.
	p.52	4.2.2.8	<p>These works have reduced a barrier to movement around the indoor shopping mall enabling the surrounding road network to become a free flowing two way road and giving pedestrians<u>s</u> the ability to cross it safely.</p>	To correct typo
	p.54	4.2.3.1	<p>The Council values the borough's Market Towns and District eCentres...</p>	To correct typo

K24/19	p.57	EC8	<p>Development that attracts large numbers of people and has a main town centre function should be consistent with the scale and the function of the centre defined in Policy EC4. 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.</p> <p><u>As provided for in Policies EC1 and EC5, the Council will only support proposal for retail development (Use Class A1) in Telford located outside or on the edge of the Primary Shopping Area, where suitable sites cannot be identified through a sequential test.</u></p> <p>Where a site cannot be identified proposals will require the submission of an impact assessment, where:</p> <p><u>Proposals for retail, leisure and office space in edge or out of centre</u></p>	<p>Improves the policy by aligning it with EC1 and EC5. Makes clear that retail uses will not be supported in the first instance outside of the Primary Shopping Area of Telford Town Centre</p>
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			<u>locations will require the submission of an impact assessment, where:</u>	
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	p.63	4.3.2.6	<p>Both the 2012 <i>Marches Hotel Study</i> and the <i>Telford & Wrekin Destination Management Plan 2014/17</i> recognise that the borough has a growing tourism market around Ironbridge and this policy therefore supports hotel development in this area <u>The Ironbridge Gorge World Heritage Site Management Plan also recognises that maintaining and strengthening the economic base of the Gorge is essential for the long term protection of the area's unique character and importance. However, any hotel proposals within the World Heritage Site will need to pay careful attention to the outstanding universal value of the Ironbridge area. Further design guidance is set out in the Severn Gorge Conservation Area Management Plan and will be elaborated on in a future SPD for the Ironbridge Gorge World Heritage Site.</u></p> <p>Newport and Wellington's appeal as Market Towns would be reinforced by the promotion of more visitor accommodation.</p>	To clarify policy EC12
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