



Date: 4 June 2015

Programme Officer –Tamworth Local Plan

South Staffordshire Council
Council Offices
Codsall
South Staffordshire
WV8 1PX

Dear Ms Willis,

Tamworth Local Plan Examination

We write on behalf of our client, Henry Boot Developments Ltd (HBDL), to respond to the Issues and Questions raised by the Inspector, as set out in the Key Matters Discussion Note, in relation to the Tamworth Local Plan.

In particular, we seek to respond to matter 11 which relates to town centre retail development. In responding to this matter, we consider that it is helpful to confirm HBDL's commitment to the delivery of the town centre Gungate scheme at the earliest opportunity. Once developed, the approved retail scheme will deliver substantial benefits by enhancing the town centre's retail offer, thus aiding the regeneration and vitality of the town centre as a whole. We note that the Local Plan advises that Tamworth's short to medium term retail needs will be met by the Gungate scheme. This is something which we fully support and confirm that discussions are ongoing with potential operators to ensure that the Gungate scheme will be implemented as soon as possible.

We previously submitted representations to the Local Plan Pre-Submission document raising concern that the inclusion of specific long-term retail floorspace requirements within the Local Plan (at Policy EC2 and SS1, and paragraph 3.18 and 4.22) is not justified or consistent with national policy. The NPPF requires Local Plan policies to be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. As specific long term floorspace figures do not provide adequate flexibility, it is our view that their inclusion within the Local Plan does not accord with national policy.

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The Council responded to the concerns raised in relation to the inclusion of long term retail floorspace requirements in the Local Plan in their Regulation 22 Statement of Consultation. We note that although the Council agree that long-term retail needs will need to be monitored and potentially re-assessed closer to 2021, they do not recommend any changes to the wording of Policy EC2 and SS1, or paragraph 3.18 and 4.22, in response to our concerns.

We welcome the Council's indication that long term need will be monitored and reassessed in the future. However, we remain of the view that in order for the Plan to be justified and consistent with national policy, there is a need to provide appropriate flexibility and, accordingly references in the Plan to specific long-term floorspace figures should be removed.

We are concerned that the inclusion of such figures may encourage proposals for edge and out-of-centre retail development on the basis that there is a long term need for such floorspace. As stated above, HBDL are committed to ensuring the delivery of the Gungate scheme which will bring substantial benefits through the improvements to the town centre retail offer. Although we consider the Local Plan to be supportive of the Gungate scheme and agree that the delivery of the scheme should be prioritised in order to strengthen the town centre, we are concerned that the inclusion of long term retail floorspace requirements is currently undermining this priority and may prejudice the town centre Gungate scheme.

Should you require any further information, please do not hesitate to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'C Johns'.

Catherine Johns
Associate Planner
For and on behalf of WYG