

Matter 9

Q9.2a Overall, does the Plan set out a positive vision with clear and integrated policies to support the management, adaptation and growth of the District's town centres? In particular:

a) does Policy 10B focus sufficiently on the full range of town centre uses and their respective contributions to maintaining and enhancing the vitality and viability of the centres?

1. We would like to see a longer list of town centre uses encouraged within town and local centres (other than Primary retail frontage), because the clustering of such uses tends to their mutual support and thus enhance the viability of the centre:

- Night-time economy: pubs, restaurants, cafés, night clubs, etc.
- Small scale medical facilities, including dentists, chiropractors, chiropodists, and physiotherapists.
- Professional services, including solicitors, estate agents, insurance brokers, and accountants.
- Personal services, including beauticians, tanning salons, tattoo parlours, and hairdressers.

2. The mutual benefit of these clustering is that a person visiting a centre for one service may well in the course of the same trip pop into a shop for a casual purchase, which she (or he) would not do if they were in separate locations, not clustered.

Q9.1 (i) Are the employment allocations justified and are they likely to provide for the needs of the local economy over the Plan period?

1. As set out under Matters 2 and 3 we consider the level of need for employment land to be reasonable at between 26 and 29 hectares, of which 23.62 hectares can be provided on existing allocations excluding Lea Castle. We consider this to be a reasonable allocation given the green belt nature of the Lea Castle site.

2. Given the allocations in neighbouring authorities and sites being pursued through the National Infrastructure process, such as Four Ashes in South Staffordshire we consider there is reasonable prospect that any gap will in reality be met nearby.

(ii) Do they allow reasonable flexibility to respond to changing market demands and promote sustainable development?

In terms of changing market demands we believe that is best considered at a wider level, particularly for strategic employment sites. It is unfortunate that these are no longer dealt with at a regional level, but there is on-going work on the M42 corridor in Shropshire as well as the Black Country. Rather than seek to foresee events, especially in a period post COVID-19 when land may become available, for example, on existing retail/town centre sites, we believe this should be subject to on-going review. In terms of sustainable development, the Lea Castle site is not particularly well-linked which is another reason for removing it as an employment allocation.

(iii) With regard to the employment policies, how should the Plan take account of the September 2020 amendments to the Use Classes Order? Does the Plan need to do more to protect land for business use?

We support the reasonable protection of employment land but have no particular comment on this issue.

Q9.4 Does Policy 35 on previously developed sites in the Green Belt give clear, adequate and justified guidance on proposals for development on the identified and non-identified sites? Is it consistent with Policy 23A of the Plan and with national planning policy?

Q9.4 West Midlands Safari Park.

1. The current policies were adopted in a response to a complaint that previously every application for a new building to enhance the Safari Park had to establish “very special circumstances”. We accept that this was unsatisfactory, but policy has now gone to the opposite extreme where almost anything that the owners want is likely to be permitted. This drives a coach and horses through good planning policy.
2. We find the plan provided is unclear. We see no objection to additional buildings within or adjoining an envelope defined by existing buildings, but that area needs to be more narrowly defined.
 - The envelope should exclude car parking areas, which should only be suitable for small kiosks, toilets, etc. that would be ancillary to car parking, or there should be a separate policy on this.
 - Within or adjoining the envelope, new buildings would be permissible with no more restriction than in an urban area.
 - In areas (beyond the envelope) where animals roam relatively free, the provision of new or replacement buildings should be governed by considerations similar to those for agriculture (as if keeping wild animals constituted a branch of agriculture).

Q9.4 Other identified sites

The two sites are in effect industrial estates in the countryside, rather than in a town. Both probably arise from development by the RAF during World War II. It is appropriate that existing uses should continue, but not that they should be intensified or added to.

Q9.4 Unidentified sites

1. We consider that the extension of a policy on major sites to unidentified sites in rural areas would open the door to a host of unwelcome developments. Existing uses are protected under Policy 21B. We are not aware of any such sites, but if the policy is left open ended (rather than being confined to the three specified sites), it opens the door for clever planning consultants to argue their client’s site is also a major one (when it is not).
2. We detect an inconsistency between Policy 6B.D which appears to encourage new rural employment development and Policy 21B which merely safeguards existing sites. In principle, we see no objection to the conversion of redundant buildings to employment uses, but the contradiction should be resolved.
3. We also see no objection to *modest* extensions to such buildings to accommodate the need of such a business to expand. There should probably be a limit on the size of such extensions, to prevent excessively large developments in the countryside, perhaps 40%, to match the guideline on house extensions.