

Walsall Town Centre Area Action Plan
Opening Statement on Behalf of Walsall Council

Cordial Thanks

Good morning and welcome back to Walsall, to the town centre *“a place for everyone”*. And welcome to the examination of the Walsall Town Centre Area Action Plan (AAP). After the examination of Walsall’s Site Allocation Document (SAD), might I venture I hope this will be an hAAPpy experience?

I would like to thank you in opening (not to say anticipation), sir, for examining this plan – and for your previous consideration of the SAD.

I would also like to thank our Programme Officer, Ian Kemp, for his helpful and capable administration. Plus, I should thank all of those attending the Examination now or in coming days, plus all of those who have responded to our consultations and who have helped our plan-making and evidence-gathering.

I should introduce myself. I am Mike Smith, the Council’s Planning Policy Manager. I am joined this morning by my colleague, Charis Blythe, who can take much of the credit for this AAP. Some other members of the team are sat behind us and we will introduce you to them and to other colleagues, partners and advisors as we go through the Examination.

Confidence

We are confident that this examination should find the AAP to be sound, certainly with the Pre-Submission Modifications and Further Modifications we are presenting - and possibly with some others. The Plan has been developed within the framework of the Black Country Core Strategy and in tandem with Walsall’s SAD, and it is based on substantial evidence as we hope to show.

Calm

This Examination appears likely to be notable because of a lack of appearances by interested parties. We are not complacent. The Council wants to see concern for and interest in the borough’s main centre. We would like to think that we have achieved a high degree of consensus and that we have provided a convincing basis for the plan.

Certainly, we do not believe there has been any lack of consultation.

Consultation

Work on the AAP, in tandem with work on Walsall’s SAD, started after the adoption of the Black Country Core Strategy and has taken some time, involving several rounds of consultation.

1. 2011 and 2012 - ‘Calls for Sites’, seeking to ensure we would have the best possible information on site availability and market interest.
2. 2013 - consultation on ‘Issues and Options’.
3. 2015 – consultation on a ‘Draft Plan’, with the explanation as to how we derived our ‘Preferred Options’.
4. 2016 (March – May) – consultation on ‘Publication Plan’.
5. 2016 (November-December) – consultation on ‘Pre-Submission Modifications’. This was necessitated by issues in respect of the SAD relating to the Habitats Regulations, which required some reworking of and consultation upon our Sustainability Appraisal. However, it did provide the opportunity to make several parts of the AAP ‘even more’ sound (or consistently expressed and freer of typographical slips).

As we will explain later, the Council has undertaken considerable consultation within the town centre, but this was also supported by consultation across much of the catchment area in combination with consultation on the SAD.

Cooperation

Throughout the preparation of the AAP, as well as the SAD, and not just as part of the consultations, the Council has cooperated with a wide range of parties.

As part of the Black Country and the metropolitan area the Council is well-used to working with neighbours and we have frequent cross-boundary 'relations' with nearby shire districts. In addition, the range of environmental, technical and other challenges affecting the borough in general and the town centre in particular mean that we often want and need to work with internal and external partners. We have also to take a positive a proactive approach with landowners, developers and funders. We hope our evidence – and the representations we have received – will help to demonstrate this.

Complexity and the Catchment Area

The time taken to prepare the AAP, the number of interests and matters involved and the consultations and evidence reflect the range and complexity of the issues in and affecting Walsall borough.

The examination of the SAD will have already demonstrated the complexity of Walsall borough, the catchment that the town centre serves. This complexity is not only in terms of patterns of land use but also social and economic conditions – and in opening the SAD Examination I referred to the Index of Multiple Deprivation 2015 (CD SA1 page138). There are also complex issues concerning ground conditions and the area's mining legacy, and further issues concerning flood-risk and the environment that apply with the town centre as well as around it. The various assets and constraints we have sought to take into account are illustrated in the Technical Appendices to the AAP (CD AM5).

The various combinations of the issues across the catchment area and within the town centre pose challenges to the viability of development. Across the borough these have been explored through a major Deliverability and Viability Study by DTZ, now Cushman and Wakefield (CD SED1). For Walsall Town Centre this is supplemented by a substantial Town Centre Demand Study and Development Sites Assessment (CD AED.1) also by DTZ. This seeks to ensure that the policies and proposals in the AAP should be deliverable. In doing this the Study takes account not only of local circumstances, but also the competition that Walsall Town Centre faces from other centres (including Birmingham, Wolverhampton, Brierley Hill, West Bromwich, Sutton Coldfield, Lichfield and Cannock) and from various out-of-centre developments, as well as trends in shopping and consumer services and in office developments, leisure and other town centre uses.

Character

The AAP defines Walsall Town Centre fairly widely, so as to include all of the areas that include or can add to town centre uses and that can support the enhancement of the town centre. The town centre in our view has a strong overall identity. However, there is a need to manage different uses and activities between different areas (notably between the Primary Shopping Area and other areas) and also to recognise the different characters of different areas of the town centre. The approach has been informed by a large Characterisation Study (AEV.4). The AAP seeks to preserve and enhance what is best about the centre whilst integrating opportunities for new investment to work towards a more attractive, better functioning and more competitive centre.

A 'Camel'

The Town Centre AAP goes further than Walsall's SAD in promoting environmental and other improvements and including policies about places and their character, as well as about sites. As a plan for the borough's main centre we think it is right to be positive and promotional in setting out our 'shop window'.

However, as with the SAD, the range of potential issues to be addressed means that we have had to make choices about what to include in the AAP. The plan necessarily focusses upon particular sites, areas and issues.

As with the SAD, we have taken a literal view of the Local Planning Regulations (especially section 9) we have mapped the policies in the document and taken the approach that if we can map something on the Policies Map then we probably ought to have a policy about it, if that policy can usefully add to existing policy in other documents. Thus, we have some policies, such as relating to character areas or to types of improvements or infrastructure that do not simply allocate sites. However, these policies should still be read together with Development Management provisions or policies – for example for things such as hot food takeaways or matters such as ground conditions – that are provided elsewhere, including in Unitary Development Plan saved policies.

In our view, this approach concentrates on the Council's main priorities, but it also reflects the resources available to the Council.

Cuts

In deciding to prepare the AAP Centre the Council is seeking to prioritise the location for the greatest change and most commercial investment in the borough. In preparing the SAD the Council is seeking to prioritise the allocation of sites for housing and for industry, whilst protecting the environment. In introducing the SAD I have already described how the Council has had to suspend work on the Community Infrastructure Levy. Walsall's Local Plans represent important choices in how to provide for investment to meet needs for the future.

When introducing the SAD I also referred to how in this era of continuing austerity the Council is facing continuing pressure for cuts in spending. Earlier in 2017 the Council had to set a budget aiming to save £86 million by 2020. Many of its partners are facing cuts too. This means that the delivery of development will need increasingly to depend on private sector investment and a case will continue to have to be made for the targeting of scarce public sector resources, such as those emerging from the Combined Authority.

At the same time, there are likely to be fewer council and public sector facilities such as libraries and fewer staff to operate them. The Planning Policy Team is smaller than it was and this makes us more prone to the 'natural shocks that flesh is heir to'. We cannot say how many 'planners' there might be in future years. Nor indeed, how many colleagues. In previous years officers of the Council's Development and Delivery Team played a big role in the preparation of the AAP. Those from that team who were most involved have now moved on, which means more responsibility for those who remain.

Collaboration

Close cooperation between the Planning Policy Team and Development and Delivery colleagues is continuing, reflecting the collaborative working that has been built up over years. We have also worked closely with other colleagues including from Transportation and from Development Management as well as with external partners like Transport for West Midlands and external

advisors such as Cushman and Wakefield. We hope such collaborative working will be apparent in a set of rounded, complementary and deliverable policies and proposals.

Competing Interests

When introducing the SAD I said that Walsall has a long history of public involvement in planning issues, and in the Town Centre there has been and is a track record of proactive involvement with landowners. It might be this that has meant that there have been few issues raised by the AAP that might count as controversies.

1. Most recently, the owners of the Jerome Retail Park have expressed concern about the proposal for improved bus facilities at Bradford Place.
2. Arrangements regarding an early warning system for potential flooding have required some detailed discussions.
3. More generally, and as one might expect, the definition of the Primary Shopping Area (PSA) has been a cause of some debate. Those proposed to be inside it have generally wanted to exclude others. Those outside it have either wanted to be included or for the PSA to be much smaller to justify out-of-centre development.
4. There have been some competing proposals for certain sites.

Generally, however, it is notable that none of the representations raise fundamental questions about the role of the AAP in seeking to meet the needs for town centre development in the context of the Black Country Core Strategy. As with Walsall's SAD, the representations that have been received from commercial interests appear to be concerned with current schemes and with short-term interests.

Currency and Continuity

Of course, the Council must take a longer-term view, to 2026 at least. In doing this we have worked with DTZ / Cushman and Wakefield to identify and map out the trends and developments that will affect the future of Walsall Town Centre. For a centre like Walsall, with the catchment and competition it has, the future is likely to be challenging. Officers, and I think Members too, sense there is some disappointment that – though we can demonstrate the delivery of recent schemes and there is more investment in the pipeline -Walsall might not be the centre that it was and that some people's hopes for the future might not easily be realised. Of course, the same can be said of other centres too, in the Black Country and elsewhere.

However, as a large and important town centre and as part of the larger Black Country and metropolitan areas, it is important see plans for Walsall as part of a wider and longer term strategy. In this case, the key role of Walsall's AAP, along with the SAD, is to deliver the urban regeneration strategy of the Black Country Core Strategy by maximising the potential for sustainable investment within Walsall's existing urban structure.

For this to be achieved it is vital that the AAP and the SAD are put in place before the Black Country has to get too deeply into the review of the Black Country Core Strategy. That has already started with the Issues and Options consultation concluding on the 8th September. The work for the Review indicates that extending the plan period for the Core Strategy from 2026 to 2036 will give rise to projections of need that will be difficult to accommodate in our existing urban areas. The Review is therefore likely to be controversial, to give rise to some wide-ranging questions and be likely to take some time. In this context Walsall's AAP and SAD should be able to provide some certainty as to the capacity and potential of Walsall's urban areas, and the AAP has the job of sustaining the town centre and making it fit to serve and accommodate growth not only to 2026 but also farther into the

future. Like the SAD, the AAP should be seen as providing a firm basis for the future as well as helping to deliver the strategy that we already have.

Commendation

Following my references to the processes and the complexities, it remains for me to clarify the description of the version of the AAP that we are asking to be examined. This is the 'Submission Version' of the Document that includes the Pre-Submission Modifications (that have been the subject of consultation) plus a few Further Proposed Modifications (set out in CD AM4, which have not been the subject of consultation).

In addition, and to reflect the latest position in respect of Council resources and priorities, Charis Blythe will be proposing some modifications during the Examination sessions.

As the Council has accepted or is promoting modifications I understand that there will be a need to formally request modifications to be recommended and I have prepared a request for you to make the necessary recommendations. The Council will, of course, welcome modifications that should improve the plan.

Subject to such modifications I commend the AAP to you.