



Walsall Council

Walsall Town Centre Area Action Plan Schedule of Representations

**Issues and Options Consultation
22nd April to 3rd June 2013**

Formal Representations



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Adjoining Local Authorities (Duty to Cooperate)

ID: 709

Lichfield
district council

www.lichfielddc.gov.uk

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3rd June, 2013

Dear Mr Elsworthy,

Walsall Town Centre Area Action Plan Issues and Options Consultation

Thank you for the opportunity for commenting and being involved in the preparation of the above plan.

The District Council support the objectives of the Plan in focussing investment within the town centre and the acknowledgement of the re-opening of the Walsall-Lichfield rail line.

We look forward to the continuing dialogue as the plan progresses.

Yours sincerely,


Neil Cox
Planning Policy Manager

David Elsworthy
Head of Planning and Building Control
Regeneration Directorate
Walsall Council
Civic Centre
Darwall Street
Walsall
WS1 1DG



Walsall Town Centre Action Plan and Site Allocation Documents

Thank you for your consultation on these documents. As far as Archaeology and the Historic Environment are concerned the chief importance is that development proposals are dealt with in line with national and local policy as defined in:

- National Planning Policy Framework (2012)
- Historic Environment Practice Guide (2010)
- Black Country Core Strategy (2011)
- Walsall UDP (2005, 2011)

Particular HE policies are as follows:

NPPF: paragraphs 58, 126-141, 156, 169-170, 184. 128 emphasises the need for the applicant to describe the significance of any heritage assets affected, including, if necessary, through commissioning field evaluation. The mention of the need to consult the historic environment record 'as a minimum' by implication commits the local authority to maintaining, directly or indirectly, a HER.

Historic Environment Planning Policy Practice Guide: this document, prepared to accompany PPS5: Planning and the Historic Environment (2010) has been retained for use with the NPPF until it is replaced by new guidance (Taylor Review 2012). Policy HE2, para 28 specifically states that *All local authorities [should] have access to a Historic Environment Record*

Black Country Core Strategy: Policy ENV2

Walsall UDP: Policies ENV 25, 26

Mike Shaw, Walsall Council Archaeological Adviser, 13.5.13

Businesses

Walsall Town Centre Area Action Plan Consultation Response May 2013

Black Country Chamber of Commerce is pleased to have the opportunity to respond to the Walsall Town Centre Area Action Plan Issues and Options consultation.

The town centre is critical to the economic growth of the Borough and we welcome recognition of this in the AAP.

Businesses are sceptical about the deliverability of the Black Country Core Strategy and therefore there is caution around the extent to which the AAP continues to be bound by its objectives. However, in the absence of a clear alternative strategy and recognising the extensive process that was carried out during the development of the Core Strategy it would be sensible to retain the current extent of the town centre boundary. The scope of the Urban Regeneration Strategy targeting new dwellings, industry land, office areas and retail space is all-encompassing, so we would advocate a particular focus on retail, industry land and improving the surrounding infrastructure. We support the development of residential properties insofar as they will support the retail sector in the town and help to encourage skilled people to move to the area – provided of course that there are the employment opportunities to attract them.

There is also a need to acknowledge the fact that both the Core Strategy and the Urban Regeneration Strategy were developed long before the recession, so they will need to be flexible in terms of what they can deliver within this context.

Both the vision and AAP objectives are laudable and would be difficult to disagree with.

Section 4. A Place for Shopping

We believe that increasing the choice, quality and diversity of the town centre retail offer is critical in order to attract visitors into Walsall. We welcome the Council's £5.5m investment in the new shopping centre and the relocation of major retailers such as Primark and Midcounties Co-Op. A good mix within the retail offering is important and we believe that the AAP should investigate the number of some uses within the town centre, such as hot food take-away outlets or betting shops.

We would encourage the Council to address the issue of car parking in the town centre as a matter of urgency. It is critical that visitors are able to access the town centre by private vehicle and park relatively cheaply. The recent scheme to offer free parking in Brierley Hill town centre in Dudley was highly successful and demonstrates the positive impact on visitor numbers.

We must also support the existing retail offer in the town. The overall appearance and maintenance of the town and public realm is particularly important, so we would urge the Council to address issues such as empty units, litter and graffiti as a priority to make the area more welcoming. Lichfield Street needs major improvement, as it gives a poor impression of Walsall since its decline. Signage for cars and pedestrians should also be improved to provide a gateway into Walsall and direct people when they are visiting the town. Fingerposts and location boards for visitors would be welcome.

The future location of Walsall Market must be addressed as a matter of priority in order to secure its future. Retailers have raised numerous concerns about its location on The Bridge, due to spatial constraints, proximity to shop frontages and poor quality of stalls. Ideally, we would suggest that the Council reconsiders other potential indoor and outdoor locations for the market, supported by investment to ensure it becomes a positive feature of the town. This would ensure that the public realm is available to offer events and other attractions. The possibility of moving the market up the hill on High Street, with a transportation system to take visitors up the hill should be seriously considered.

We would also recommend significant improvements to the market to enable it to compete with the high-quality, specialist markets around the region. This is an opportunity to raise the bar and create a market with a strong USP that will attract visitors into Walsall.

Section 5 A Place for Business

We are concerned however about the focus on delivering a strong office market with regards to the development of major new office space. There is already a surplus of office space which cannot be let and we are not convinced by the evidence of demand for additional office units. The minimum rental for office development to make a profit if the site is at a commercial value would be circa £18 per square foot. As Walsall rents are £6-8 per square foot, it is unlikely that the developers would be attracted to the town, unless it is a publicly funded scheme such as through Walsall Housing Group.

We are also seriously concerned about the current thinking on industrial land choices. Walsall simply does not have the infrastructure to support inner city sites.

A radical approach, such as that adopted by the Council during the City Challenge, plus substantial investment is required. Developers and owner occupiers will always seek out well serviced sites close to links with major roads.

The Council must find a way of developing sites more quickly once they have been agreed. It is simply not acceptable for a financial or inward investment perspective for regeneration projects to be on the table for several years (or decades) without any development taking place. The former IMI James Bridge Copper Works site is the prime example. We appreciate that the Black Country has recognised this issue and is attempting to address it through the City Deal negotiations. However, we cannot overstate the critical importance of the Council's ability to compulsorily purchase land and provide planning permission for strategically important industrial and infrastructure developments.

We would advocate the serious investigation of improved road infrastructure, including links to the M6. Industrial sites really need to be situated close to the motorways to improve access and to minimise additional congestion on the local road network. The green belt land near Junction 7 M6 could be developed for example, but we do not believe that the Council could realistically consider new industrial sites separately from improvements to the road network. Without road infrastructure improvements, it will be impossible to attract new industry into Walsall, particularly with major competition from Southern Staffordshire, Shropshire and the A38 corridor.

Ensuring that Walsall has a skilled workforce available is also key to attracting inward investment. Therefore the AAP must be progressed in conjunction with efforts to raise the skills levels within the borough and improve access to appropriately skilled individuals.

We look forward to the outcome of this consultation and hope to continue working with the Council as the AAP is implemented.

A Place for Business – ‘Have your Say’

Name: Peter Machin – HH Plastics Limited

What do you think are the key issues around Business in Walsall Town Centre?

Lack of free parking. Lack of space for bigger units available for industry

What can we do to create demand for offices and a strong business environment? Should offices be group together at the Gigaport or spread out around the centre? How can we ensure Gigaport links well with the rest of the town centre?

Not all businesses revolve around offices, Most business have a requirement for stock holding and storage. This needs to be accommodated more in the area before consideration is given to just office space.

What should happen to the current Industrial Uses? Please tick the box below to show which option or options you think is best, and explain why.

Options	Tick Box	Comments
Industrial Uses Option 1: We protect and enhance the current industrial uses within the town centre	Yes	Most Walsall businesses are growing and there needs to be units for them to progress into. Without business / industry in the area there will be no need for more houses & business will be driven out of the Walsall area.
Industrial Uses Option 2: Alternative uses for the current industrial sites and the relocation of industry are	No	

<p>considered once all other development opportunities have been maximised</p>		
<p>Industrial Uses Option 3: We aim to attract particular industrial sectors, for example those that would utilise the close location to the hospital could be allocated sites for the promotion of Research and Development or other related uses</p>	<p>NO</p>	

Do you have any suggestions for how we can ensure businesses in the town centre are successful relocated to more suitable locations if we pursue this option?

Relocation is not the Answer, most businesses can not afford to move and will lose custom by moving. Help business to grow first, create jobs. Don't drive them out of the area.

Do you have any comments on the questions included on the 'Place for Business' map? Please state which question when answering.

The place for business is Walsall due to transport links, if your not careful you will ruin your own town.

Bradford Place

ID:1717

Bradford Place 'bus interchange' will never be a proper 'bus station'. It is dangerous for pedestrians; with taxis, buses and motor traffic it will always be hazardous. All the bus stands cannot be accommodated around the kerbaph with bus stops also being situated up Bradford Street past Midland Road. This is a particularly dangerous spot for pedestrians and traffic unfamiliar with the layout.

Jerome Park is too far away, across roads for a bus station with CPO implications.

Buses should leave Bradford Place, which could be restored as a

virtually traffic-free square - complete with seats, trees and flower beds. A safe taxi rank could be retained.

A NEW BUS INTERCHANGE should be established at STATION STREET on the so-called 'Station car park.

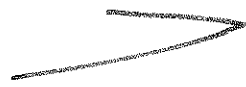
This is the site of the old MR/SSR Goods yards adjacent to Platform 1. It is probably still owned by Network Rail.

Station St Yard is far too valuable a site in the town centre area to be used for car parking alone.

It is an IDEAL place for a 12-stand Bus station adjacent to Platform 1.

A proper station entrance, waiting room and 'cafe' could be built for bus/rail passengers with excellent location for the town centre. (5 minutes walk)

It would be a safe bus station for passengers



Under no circumstances should the location of the Railway Station be moved.

Walsall is one of few UNIQUE towns in having a Railway Station right in the town centre.

Just think of some of the midland towns with stations situated at a distance from the town centre.

4.

Examples: of station locations.

Wolverhampton. - Poor situation for town centre outside the ring road $\frac{1}{2}$ mile to centre.

Coventry. Terrible station location outside ring road. A 'bus ride from town centre.

Northampton. The old Castle station is $\frac{1}{2}$ hr walk from town centre.

Cheltenham Spa. Taxi ride from town centre.

Leicester. $\frac{1}{2}$ mile from town centre.

Nottingham. $\frac{1}{2}$ mile from town centre.

Cannock. - 20 mins walk from town centre.

ect ect

5.

Probably the ONLY advantage of Birmingham New Street is that it is located in the centre of the Shopping Area.



Walsall must take advantage now of the long-awaited extension of the electrification of the station.

Track and point-work has been completed over Easter - probable cost £250,000 so that Platform 3 has been re-connected to the North and is now a through line again. (Points installed at North end of Park Street tunnel)

Platform 4 must be restored in anticipation of a service to Aldridge -

- not a difficult task - but must be done before the signal cable ducts are finished

* A platform 5 - a south facing bay platform sharing platform 1 as an island platform would be useful.

Taking 4-car Birmingham shuttles without blocking through lines whilst waiting.



Resignalling of Walsall Area is in an advanced state (£15m) due for completion in Aug 2013. - with the closure of Walsall Power-Signal Box, and other boxes at Bloxwich, Hednesford and Breerton Sidings. The whole area to be controlled from the new

West Midlands Control Centre (Saltley)

The closure of Bloxwich level crossing is important on safety grounds alone. With 25KV overhead wires and frequent trains at 75 mph this would be a hazardous urban level crossing.



Buses using the new Station St. Bus station would enter the town via Compton St West, and Long St to Station St.

Thus Bradford P. Street would not be used by buses (safe for pedestrians) and the avoidance of the Subway would allow double decker buses

if required.

8

Z

Loss of Car Park Spaces in Station St?

The demolished BOAC site adjacent unused Parks Plating works could be acquired (CPO?) for car-parking.

5 minutes walk to town centre.

* Again Station Street Car Park (as now used) is too valuable a site for just car-parking.

It is an ideal site for a 12 stand bus station with facilities shared and built for the Railway Station.

A real opportunity to establish a proper bus station for South Walsall services.

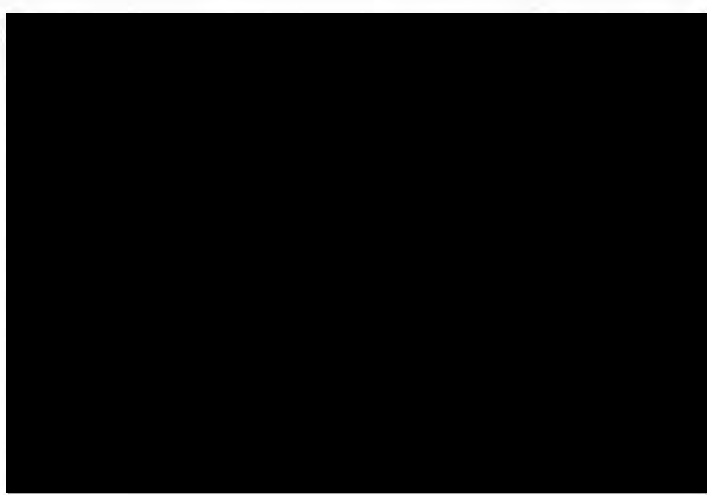
9

I hope my suggestions are of interest. Having lived in Walsall for over 60 yrs, I really know the town.

Regards



REGENERATION
29 MAY 2013
RECEIVED



North

Park Street Tunnel

Old form to be reinstated.

BRIDGE

Platform 1

Platform 2

Platform 1

Platform 5

WALLS ALL

New South Facing Bay
Birmingham Penn
Birmingham Shuttle

Railway Station

Waiting Room
Refreshments

Entrance

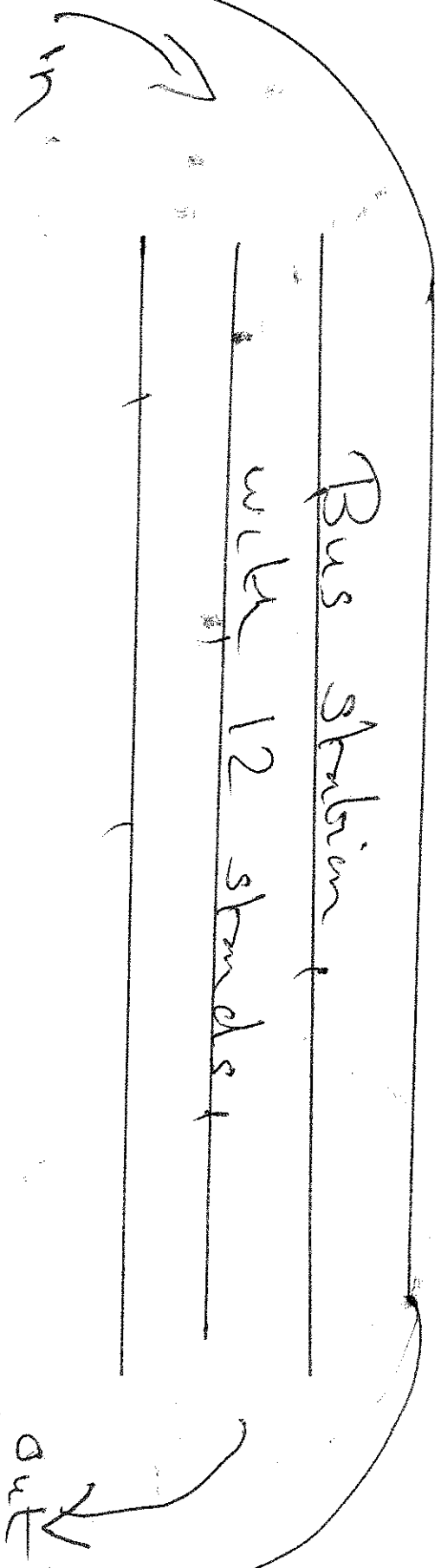
This is possible

South
Park Street

2

Bus Station

with 12 stands



Town Centre, STATION STREET



Walsall Business Parks Ltd

Registered Office: Chamber of Commerce, Ward Street, Walsall WS1 2AG

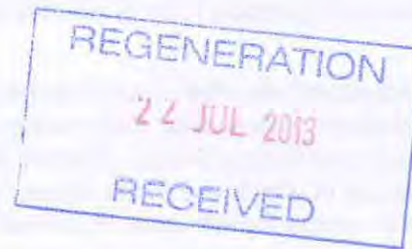
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Fax: 01922 645721

Email: susancyster@blackcountrychamber.co.uk

17th July 2013

Ms Alix Jackson
 Planning Policy Team
 Walsall Council
 Darwall Street
 Walsall
 WS1 1DG



Dear Ms Jackson

Re: Walsall Town Centre Area Action Plan – A Place for Business

I am writing with reference to Chapter 5 of the Councils town centre Area Action Plan which explores the need for additional sites for new offices and refers to Town Wharf Business Park as a possible location for this purpose.

As chair of the well-established Town Wharf Business Park company I am writing to express the collective views of our members on the estate.

Town Wharf Business Park is home to 34 businesses; of which 19 are manufacturing companies with a total of around 267 employees. These manufacturers supply major industries across the UK such as Jaguar Land Rover and JCB and are growing year on year despite the uncertainty in the current economic climate.

The business park has been recognized as an industrial area for many years, indeed Kirkpatrick Ltd has been on their Frederick Street site for 158 years and its brand is recognized worldwide.

The estate has an active committee, made up of local business leaders who meet regularly with representatives of the Council and the police, as a result we have a clean and tidy industrial estate with very few vacant units and minimal crime.

The estate is easily accessible by public transport and many of the 267 workers travel to work by this method, in fact this is the only means of transport available to a lot of them.

The workforce makes regular use of the town centre supporting local shops and cafes.

If the area was designated as non-industrial and existing business forced to relocate they may well choose to move out of the borough or simply close down altogether. The cost of relocation for some of them would be astronomical due to the amount of plant and equipment to be moved on top of all the other costs associated with moving premises.

Even if companies aren't forced to relocate there is likely to be a gradual migration from the area as lease agreements expire and there is every likelihood they will move out of Walsall. If this happens units will be vacant for long periods whilst investors are sought. This will certainly result in increased crime and vandalism.



Registered in England 4729917
 INCORPORATING





Walsall Business Parks Ltd

Registered Office: Chamber of Commerce, Ward Street, Walsall WS1 2AG

Tel: 01922 728294

Fax: 01922 645721

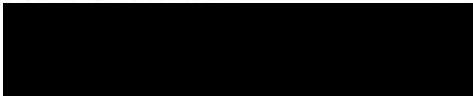
Email: susancyster@blackcountrychamber.co.uk

The workforce who travel by public transport may be unable to access other sites as their only means of transport is by bus, train or foot so their very livelihood will be threatened.

We do not understand why the Council would want to put the future of local businesses and their employees at risk when there are numerous town centre sites more suited for office space such as Bridge Street, Ablewell Street, Caldmore Road, Wednesbury Road, Stafford Street, all of which are major access routes into the town and in need of improvement so would benefit from investment and development of this type.

We would appreciate it you would include these observations in your report.

Yours sincerely



Megan Messenger
Chair

Contact Details**First Name** Walsall Town Team**Surname****Organisation / Company Name****Address** c/o Walsall Town Centre Management Team3rd Floor Civic Centre

Darwall Street

Walsall

Postcode WS1 1YS**Email Address** towncentre@walsall.gov.uk**Phone Number** 01922 654323**Unique reference number** n/a

(if you have received a letter or email about this consultation please state the unique reference number here)

Please place an X in the one box that best describes you / your role in completing this consultation:

Resident or Individual		Local Authority	
Business	X	Public service provider e.g. education establishment, health etc	
Developer or Investor		Public agency / organisation	
Landowner		Statutory Consultee	
Planning Agent or Consultant		Charity	
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation	X		

1. Introduction, 2. What is Walsall Town Centre? and

3. The Vision for Walsall Town Centre

The introduction sets out what the Area Action Plan is, the structure of the document and the planning context. It also explains about the Sustainability Appraisal of the plan, which you can also comment on. Chapter 2 gives an introduction to the context of Walsall town centre by looking at its location and role within the wider Borough. It also covers the key challenges which are facing the town centre. This chapter includes questions and options around the proposed boundary for the AAP for your consideration. The third chapter introduces the vision and objectives for the town centre before asking if this aligns with your aspirations for Walsall.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. TCB:Q1	Comments
AV: Q1	<p>Do you agree with the vision above? What is your vision for the Town Centre?</p> <p>The vision as written is clear and shows a generic vision for a town centre. As a vision it could be for any town. There does not appear to be a central standout vision that makes Walsall unique.</p> <p>My own vision for the town centre is to become a destination for Walsall residents and people from surrounding area's building upon the heritage of the town, its market, and its people whilst showing an inclusive service sector, joining heritage leisure daytime and nighttime activities. Walsall needs to develop a personality.</p> <p>Yes - May also be beneficial to capitalise on the excellent transportation links in to Walsall - In between Birmingham and the Black Country. 3 motorway junctions with good rail and road networks.</p>

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4. Walsall Town Centre – A Place for Shopping

This chapter asks you questions about the current shopping experience in Walsall and the existing retail offer. It also asks questions about the Primary Shopping Area and the locations for potential new retail development. Another key focus of this chapter is the future of Walsall Market and we ask for your view of the best location for a permanent home for the market.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. S:Q8	Comments
S:Q8	<p>Which of the above 3 options do you agree with the most and why</p> <p>Option 1. Fragmentation of the high street will detract from the centre and will lead to retail parks splitting up the area. We need to ensure that the people that visit Walsall stay in the centre to use all the facilities such as the art Gallery and the night time activities. When we lose retailers to the out of centre parks such as Bescot it gives shoppers a reason to leave the town centre car parks and they do not return later that day.</p> <p>Option 2 - It appears to offer a more pragmatic approach to development. This is more aligned with the vision.</p>
S:Q8	<p>Which of the above 2 options do you agree with and why?</p> <p>Option 1. It comes down to quality over quantity. We need a market that has a purpose and an identity. Farmers markets and traditional stalls are always popular and bring repeat custom. Tat stalls bring down the perception of the market.</p>

S:Q12	<p>Option 1 - The market needs a permanent location and this would be at the heart of the centre. However, thought would need to be given to encourage better quality, diversity and rotation of stalls</p> <p>What improvements or changes are needed to ensure the long term success of Walsall Market?</p> <p>We need to ensure that we bring in quality stalls and by investing in better architecture we can draw in a higher standard. The market needs to have its own vision and standards. We need to limit the type of stalls and ensure we attract niche stalls and traditional stalls such as butchers/pet supplies/farmers/food.</p> <p>Perhaps the offering could reflect the population of Walsall more. Certain days could be themed - ie: Asian markets, Tuesday (OAP), Thursday (ready for the weekend) target a younger market</p>
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5. Walsall Town Centre – A Place for Business

This chapter looks at the town centre's current economy and the existing office market, before considering new opportunities for office development and asking questions about the type and location of new office development. It also considers

canalside locations in the town centre, the evening economy and the overnight accommodation offer.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. L:Q19	Comments
L:Q7	<p>What do you think could be done to encourage more users of the town centre to visit the Arboretum? And vice versa?</p> <p>We need to have boards in the town centre and the Arboretum that have information on them about each other. They should highlight the reason for visiting i.e. the art gallery, or the lake/adventure area.</p> <p>The play area needs to be revamped and it needs a point of difference such as a petting zoo and some refreshments.</p> <p>Walsall illuminations were one of the reasons I first heard about Walsall and they encouraged me to bring my children.</p> <p>Shuttle bus which could operate from dedicated stops within the town to the Broadway entrance of the arboretum.</p>
L:Q12	<p>What kind of events should be held in the town centre? Where should such events be held?</p> <p>Night markets are great and join the day and night economies together.</p> <p>We should also look at events that stand out ie the German Market in Birmingham. These should be along Park Street.</p> <p>Canal boat events.</p> <p>Carnival. Festivals of culture in the Art gallery square</p> <p>- As above. Potentially, the arboretum could be (on certain days only), used as a Park and Ride facility?? (Excellent feedback on the Fair at the arboretum this weekend)</p>

	<p>Could link up with local schools and groups. In front of the Art Gallery. Often the weather / season would dictate the best sort of event.</p>
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7. Walsall Town Centre – A Place for Living

This chapter looks at the current housing provision within the town centre, and education, community and health facilities. It asks questions around the future need for such uses in the town centre and their possible locations. There are also questions around enhancing the character of the centre and the quality of buildings. There are some key questions around public space and environmental infrastructure.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s)	Comments
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e.g. LV:Q3	
LV:Q30	<p>Which areas of the town centre need public realm improvements, and how should this be done? Is any new public realm needed? If so where and why?</p> <p>The top of Park street through to the crown Wharf. This seems to be very disjointed. If we stopped cars from using this area customer flow would improve. Getting across Lichfield street to the Arboretum.</p> <p>Currently, I think Leicester St leading on to Bridge / Freer streets could look and be utilised better</p>
LV:Q32	<p>Are there parts of the centre that you consider difficult to move around?</p> <p>As above.</p> <p>Lichfield Street due to no access of cars heading towards Bridge Street</p>
LV:Q35	<p>What would improve the pedestrian experience? How can linkages between Park Street and other parts of the town centre be improved?</p> <p>We need to have pedestrian signage that points out the towns highlights and how to get to them and how far away they are. Town centre maps to show links.</p> <p>Greener areas (perhaps sponsored by local schools where children can become involved???) Small trees (sponsorship from local garden centres as this would also give them an opportunity to advertise)</p>

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8. Transport, Movement and Accessibility

This chapter looks at all aspects of movement into and around the town centre, including pedestrian movement, cycling, public transport, taxis and car parking. There are key questions around what streets could be pedestrianised, the location of a larger transport hub in the centre and the possibility of creating 'super car parks'.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. T:Q11	Comments
T:Q5	<p>Which of the above options do you agree with most, and why?</p> <p>Option 2. Station street seems to be very disjointed to the Town centre yet should be a gateway. We need to look at Wolverhampton and the way they have changed. Transport is key for both the daytime and nighttime economies. The car park could be relocated next to Tesco linking a few car parks together.</p>
T:Q6	<p>What improvements do you think are needed to public transport to and around the centre?</p> <p>Public transport needs to have a joined up thought process with bus rail and taxis in a central location in a safe environment, linked into the shopping and evening markets.</p> <p>Invest in peripheral parking (possibly free or vastly reduced) - Park</p>

	<p>and Ride. This may not necessarily require the building of car parks. Roads on the outskirts of town where there are currently charges could be better utilised to encourage people to park free and pick up a bus in to the town.</p>
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9. Walsall Town Centre – A Place for Investment

This chapter asks questions around the approach of promoting the Big Three (St. Matthew's Quarter, Gigaport, and Waterfront) and Park Street as the key areas for development in the centre and what uses should be located in these areas. This chapter also includes the 'Key Decisions' map where we have identified the sites where we think there are important choices to be made. These are the issues where we really want your views as we think they hold the key to the future of Walsall Town Centre.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Walsall Town Centre Area Action Plan

A Place for Everyone

'Have your Say' Response Form

1. Introduction, 2. What is Walsall Town Centre? and

3. The Vision for Walsall Town Centre

ALL:

The Vision: By 2026 Walsall Strategic Centre will have been regenerated as a sub-regional focus for the local economy and the community. It will provide its catchment area with an attractive choice of comparison shopping and leisure, entertainment and cultural facilities as well as supporting a thriving office market. Walsall will also support modern town centre living. The centre will bring all of these activities together in a vibrant, safe, attractive and accessible environment that combines local heritage with modern design.

Question Number(s) e.g. TCB:Q1	Comments
AV: Q1	<p>Do you agree with the vision above? What is your vision for the Town Centre?</p> <p>Agree with Vision</p>

4. Walsall Town Centre – A Place for Shopping

AB / PB / TO / AS / CP:

The AAP will need to allocate the key locations for future retail development and we have several options as to where to allocate for major new investment.

<p>Location of New Retail Option 1: Park Street and St Matthew's Quarter are allocated for retail development opportunities</p>	<p>Implications: Shopping investment remains focussed and the heart of the centre is maintained.</p>
<p>Location of New Retail Option 2: Once opportunities have been maximised for Park Street and St Matthew's Quarter, development opportunities elsewhere in the town centre will be allocated for retail development</p>	<p>Implications: A phased approach to the location of major new retail investment would ensure the heart of the centre is protected whilst providing opportunities to meet the comparison retail targets. Investment may take longer to deliver as Park Street and St Matthew's Quarter is in need of redevelopment and reconfiguration in order to meet modern retailers' requirements but this approach would ensure a sustainable approach to retail development.</p>
<p>Location of New Retail Option 3: The location of major retail development is uncontrolled through the AAP and the location of key retail is left to the market.</p>	<p>Implications: The Council would have little control over the location of new retail development and the heart of centre would be at risk of further decline as investment is attracted to easier to develop edge of centre locations. A lack of control over the location of retail development would have implications for the delivery of other targets such as office.</p>

Question Number(s) e.g. S:Q8	Comments
S:Q8	<p>Which of the above 3 options do you agree with the most and why? Option 2: This places Park St + St. Matthews at the heart of shopping investment with managed/staged development once Park St etc have been fully employed.</p>

- Demonstrates best use of land, in a managed environment and place

ALL:

How do we secure the future of Walsall Market?

The market in Walsall is an important tradition of the town centre and has been in existence since 1219. Although popular and part of the town's heritage, there is a perception that the quality of the stalls provides a negative image of the town centre, and its attractiveness and usage has declined since its peak. To enhance the place value of the town centre and encourage stallholders and customers to stay, a permanent home is required for the market. The Council has commissioned independent work to assess the potential locations for the long term home for the market. This has concluded that the market should be located permanently on The Bridge and in Bradford Street, and this should be accompanied by significant investment in the public realm, the quality of the stalls and supporting infrastructure, the range and quality of produce, and the way in which the market is managed.

<p>Walsall Market Option 1: Pursue the proposed permanent location for the market on The Bridge and in Bradford Street</p>	<p>Implications: This will deliver an improvement in the quality of the market. However the spatial constraints may lead to a reduction in the overall number of market stalls.</p>
<p>Walsall Market Option 2: The Council should reconsider other potential indoor and outdoor locations for the market.</p>	<p>Implications: It is considered that this may lead to further delays and uncertainty about the future of the market.</p>

Question Number(s) e.g. S:Q8	Comments
S:Q8	Which of the above 2 options do you agree with and why? <u>Option 2</u>
S:Q12	What improvements or changes are needed to ensure the long term success of Walsall Market? Market needs to engage with more of the population & specialist market like Italian/German etc - providing a stronger USP.

A better location, frees the current area. The area in front of post office for example houses a great deal of space, or on the HU (High St) - a land train would give Walsall a USP.

This would then make the current overcrowded market area open to ~~open~~ public events.

5. Walsall Town Centre – A Place for Business

AW / TO:

Where should Major New Office Development be located?

The development of a strong office market is crucial for the strength of the centre and will be critical to improving the spending power within the town centre, and act as a catalyst for other developments in the leisure and retail sectors. It also serves a wider role in the economy of the whole Borough.

Question Number(s) e.g. B:Q3	Comments
B:Q1	What type of offices should be delivered? we already have office space
B:Q2	What can we do to create demand for offices and a strong business environment? Review rent (if possible + rent rates). Develop on existing office space. with so many units empty, why build/develop more? - this would only increase the problem.

6. Walsall Town Centre – A Place for Leisure

ALL:

A key leisure attraction is the Arboretum which, while outside the boundary of the AAP, is just a short walk away from the centre, and developments here will be of such significant value to the town centre that it cannot be overlooked in the AAP.

Question Number(s) e.g. L:Q19	Comments
L:Q6	How do you think the physical links between Walsall town centre and the Arboretum could be improved? 1. approach 1) Signage
L:Q7	What do you think could be done to encourage more users of the town centre to visit the Arboretum? And vice versa? what is unique about it? Answer: quiet, special but do people want this alone? what about if Town Train took you there? how about holding events? eg musical? <u>Outdoor theatre?</u>

The Town Centre lack a large performance venue and locations for public events.

Question Number(s) e.g. L:Q19	Comments
L:Q12	What kind of events should be held in the town centre? Where should such events be held? Olympic torch proved interest by the local population. <u>But</u> not one event doesn't usually appeal to everyone. So, how about musical events,

theatrical events.

Walsall marathon style events. ⁴

SS / NP:

How can we make the centre vibrant in the evenings?

The AAP needs to encourage investment in drinking venues and restaurants in order to provide a more diverse experience for users of the town centre. There is a need to attract greater diversity of people into the town centre, and meet the needs of all residents, especially families. The AAP will need to explore how to attract such investment, and the best location for such uses.

<p>Evening Option 1: The AAP identifies particular zones within the town centre in which to focus investment in the evening economy</p>	<p>Implications: This may prove attractive to both customers and investors, and be more manageable from a public safety perspective, whilst not detracting from the amenity of other town centre uses.</p>
<p>Evening Option 2: The location of evening economy establishments is not zoned</p>	<p>Implications: The creation of an attractive and manageable evening quarter could not be guaranteed.</p>

Question Number(s) e.g. L:Q19	Comments
L:Q15	Which of the above options do you agree with most, and why? <i>Option 1 - keeps policing etc contained</i>
L:Q16	What do you think is missing from the eating and drinking offer in Walsall town centre? <i>Not enough nice eating places; most are unpleasant experiences</i>
L:Q17	Where do you think such outlets should be located?
L:Q19	Is there an adequate range of overnight accommodation in the town centre? Where should additional accommodation be provided? <i>Unsure</i>

Where should Major Leisure Development be located?

There is evidence to suggest there is a need for a large commercial leisure development, such as a cinema, to be located in the town centre, and the AAP should identify a location for such a facility. The attraction of a cinema operator as an anchor to a development scheme, with its footfall generation, will attract a number of other end users in the leisure sector. Building upon the success of the New Art Gallery, Waterfront has been promoted as the location for large scale leisure developments, and could accommodate a cinema and supporting bar/restaurant uses. There are, however, other locations where there has been interest in a cinema and as the centre could only support one, careful consideration is needed over the best location for a cinema.

<p>Leisure Option 1: The AAP allocates Waterfront as the primary location for large scale leisure developments</p>	<p>Implications: Waterfront is an attractive location for leisure development, and has the potential for such uses.</p>
<p>Leisure Option 2: Leisure development is allocated elsewhere in the town centre only when Waterfront is fully delivered for leisure or other uses</p>	<p>Implications: This would allow greater flexibility, but other town-centre sites may not prove as appealing as Waterfront for leisure investors</p>
<p>Leisure Option 3: Leisure development is not allocated and the location of such development is left to the Market</p>	<p>Implications: Leisure developments often require a significant footprint and consequently if locations are not assigned, sufficient space may not be found to accommodate developments.</p>

Question Number(s) e.g. L:Q19	Comments
L:Q23	Which of the above options do you agree with most, and why?
L:Q24	What kind of commercial leisure facilities would you pay to use in Walsall town centre?
L:Q25	Where do you think is the best location for such facilities, especially the cinema?

Option 2. Allows controlled development, based on demand

7. Walsall Town Centre – A Place for Living

ALL:

What do you think of the public realm experience?

An attractive public realm enhances people's quality of life and the perception of a place. The AAP will need to consider how to improve the public realm within the town centre. Legibility across the town centre, between the interchanges, the retail core and other important elements of the town centre also needs to be improved.

Question Number(s) e.g. LV:Q3	Comments
LV:Q30	Which areas of the town centre need public realm improvements, and how should this be done? Is any new public realm needed? If so where and why? <i>Currently town centre is very shabby</i>
LV:Q32	Are there parts of the centre that you consider difficult to move around? <i>Eg broken paving; litter, empty units - gives it a feel of run-down</i>
LV:Q35	What would improve the pedestrian experience? How can linkages between Park Street and other parts of the town centre be improved? <i>Flowers, pavements maintained/improved. Better shops well within close walking distance to</i>

each other; decent restaurants. ~~hand~~ More leather shops, what about taking advantage of leather heritage? Eg handbags, shoes - This could become a real attraction.

8. Transport, Movement and Accessibility

ALL:

Does the current public transport service meet your needs?

Good public transport is key to ensuring the town centre is sustainable and that it can be accessed by all residents.

Public Transport Option 1: Re-develop St. Paul's into a bus station with larger capacity	Implications: This would deliver one centralised bus station with close proximity to the rail station, which would increase accessibility to the town centre. However this would require large detours for buses or the de-pedestrianisation of The Bridge, and have implications for neighbouring land uses.
Public Transport Option 2: Development of a new multi-modal facility at Station Street.	Implications: This would result in a much improved bus/rail interchange. There would however be implications for the railway station car park.

<p>Public Transport Option 3: Redevelop Bradford Place Interchange to create larger capacity by expanding into Jerome Retail Park</p>	<p>Implications: Creating extra capacity will improve passenger experience, safety and the reliability of services, but would have implications for neighbouring land uses.</p>
<p>Public Transport Option 4: No major public transport changes are identified through the AAP</p>	<p>Implications: As demand rises, public transport will face further pressure, resulting in less reliable services, causing more car dependency and potentially impact upon the economic growth prospects of the town centre.</p>

Question Number(s) e.g. T:Q11	Comments
T:Q5	Which of the above options do you agree with most, and why?
T:Q6	What improvements do you think are needed to public transport to and around the centre? <i>No comment. there is a far greater</i>

need for cars/car parking. Walsall is currently not geared up to attracting visitors. Plenty of Car Parking and reasonable price and good illuminated signage (eg Wolverhampton) should be a 'quick win'.

Community, Voluntary & Other Organisations

Hi Mike,

Re: Town Centre

Walsall a 'Place for Leisure'.

It is the opinion of the night time economy (NTE) that great consideration is given when deciding where to accommodate future leisure developments.

It seems to be the position of the Council to move all future developments to Wolverhampton Road and the Waterfront area, this in our view would only create another leisure area and subsequently have a detrimental effect on existing NTE businesses and create a huge vacuum between Bridge Street, Bradford Street and the Waterfront.

There are ample sites in Bridge Street and Bradford Street that could accommodate future leisure interests and it would be far more prudent for these sites to be considered rather than new developments be constructed. To prevent the further decline of inner Town Centres we must make it a priority to protect and preserve our Town and further developments is not the answer as some see and I urge you take these views into consideration when considering these proposals.

Kind regards.

Suky Samra LLB (Hons)



2.6.13

Dear Mike,

re Walsall Town Centre Area Action Plan
Issues & Options.

Herewith our submission for your perusal, I have actually read all the documents. In the short time at our disposal, I have only been able to undertake limited consultation with colleagues. I have also made a submission on behalf of Churches Together in Walsall for the Walsall Site Allocation Document.

Yours sincerely



A Partnership of Churches, working together
to make God known in Walsall Town Centre,
through a Ministry of Care, Celebration and Community.

- Central Hall Methodist Church
- Hatherton United Reformed Church
- St Mary's on the Mount Catholic Church
- St Matthew's Church of England
- St Paul's at the Crossing Church of England

St Paul's Church Office
Darwall Street
Walsall
West Midlands
WS1 1DA

Tel: 01922 620669
Fax: 01922 724897

Email: crossingchurchoffice@gmail.com
Website: www.thecrossingatstpauls.co.uk

Contact Details

First Name PATRICK

Surname KELLY

Organisation / Company Name WALSALL TOWN CENTRE MINISTRY

Address
Postcode

Email Address
Phone Number

Unique reference number
 (if you have received a letter or email about this consultation please state the unique reference number here)

Please place an X in the one box that best describes you / your role in completing this consultation:

Resident or Individual		Local Authority	
Business		Public service provider e.g. education establishment, health etc	
Developer or Investor		Public agency / organisation	
Landowner		Statutory Consultee	
Planning Agent or Consultant		Charity	X
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation			

1. Introduction, 2. What is Walsall Town Centre? and
3. The Vision for Walsall Town Centre

The introduction sets out what the Area Action Plan is, the structure of the document and the planning context. It also explains about the Sustainability Appraisal of the plan, which you can also comment on. Chapter 2 gives an introduction to the context of Walsall town centre by looking at its location and role within the wider Borough. It also covers the key challenges which are facing the town centre. This chapter includes questions and options around the proposed boundary for the AAP for your consideration. The third chapter introduces the vision and objectives for the town centre before asking if this aligns with your aspirations for Walsall.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. TCB:Q1	Comments
TCB Q1 Option 1 AV Q1	SUPPORT AGREE

4. Walsall Town Centre – A Place for Shopping

This chapter asks you questions about the current shopping experience in Walsall and the existing retail offer. It also asks questions about the Primary Shopping Area and the locations for potential new retail development. Another key focus of this chapter is the future of Walsall Market and we ask for your view of the best location for a permanent home for the market.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. S:Q8	Comments
S Q1	Present Town Centre is declining. Needs another department store (e.g. House of Fraser) and another quality supermarket (e.g. Waitrose)
S Q 2	A great deal
S Q 3	Certainly esp betting shops
S Q 4	Support Option 1
S Q 8	Support Option 1
S Q 10	Support Option 2
S Q 11	NO!! The indoor market in Birmingham is highly successful. A more modest one in Walsall would also be.
S Q 14	Support - George Street, Mountbath Street, Lower Hall Lane

5. Walsall Town Centre – A Place for Business

This chapter looks at the town centre's current economy and the existing office market, before considering new opportunities for office development and asking questions about the type and location of new office development. It also considers the current industrial premises in the centre and what should happen to these in the future.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. B:Q3	Comments
B Q 3	Option 1. Linked to a relocated railway station at Hatherton Rd car park.
B Q 4	Improve pedestrian links via Wisemore Hare bus stop on red route in Littleton St near Tesco, leather Museum + Walsall College for Arriva bus services 1, 2 + 2A. This was overloaded when red route was approved.
B Q 6	Support Option 3

6. Walsall Town Centre – A Place for Leisure

This chapter looks at the current leisure, cultural and community facilities in the town Centre. It asks crucial questions about the location for a cinema and around the future of the Gala Baths. There are also some questions around maximising canalside locations in the town centre, the evening economy and the overnight accommodation offer.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. L:Q19	Comments
LQ 1	Support Option 2. If not possible enter partnership with private sector.
LQ 6	Improve pedestrian links. The current traffic lights act as a <u>major</u> deterrent.
LQ 8	Support Option 1.
LQ 11	Support Option 4 ALUS Goldmine in Lower Hall Lane
LQ 14	Support Option 7. Include The Bridge when the market is relocated cf. S Q 11
LQ 15	Support Option 1
LQ 18	Support Option 1 - Town Hall, Station St, George St or Mountbath St
LQ 20	Support Option 1
LQ 23	Support Option 2
LQ 25	There are currently 2 possible locations for
	a cinema. Support BOTH applications. The present sole cinema in Walsall is inaccessible by public transport so potential customers go elsewhere e.g. Birmingham

7. Walsall Town Centre – A Place for Living

This chapter looks at the current housing provision within the town centre, and education, community and health facilities. It asks questions around the future need for such uses in the town centre and their possible locations. There are also questions around enhancing the character of the centre and the quality of buildings. There are some key questions around public space and environmental infrastructure.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. LV:Q3	Comments
LV Q1	Support Option 2
LV Q9	Support Option 1
LV Q11	Do need improving
LV Q17	Support Option 1. Preserve + enhance Walsall's heritage contributing to Walsall's tourism potential. N.B. ALL 5 TCM churches are listed.
LV Q20	Support Option 2. Prescriptive architecture should be viewed as a positive asset.
LV Q23	Support Option 1
LV Q23	St Mary's on The Mount Church Grade II*. View obscured from railway by recent developments.
LV Q23	Option 2 including tight enforcement.
LV Q29	Support Option 1
LV Q32	Restore the black plastic seats to Park St and remove the unused and unloved black plastic boxes. This would enhance the experience for people with disabilities.

LV Q32 Option 1 BUT removal of planters and seats are negative. IMPROVE the street.

LV Q34 Option 4 LV Q35 Pedestrianise Wolverhampton St from Park St
 LV Q36 Option 1 for Crown Wharf, Stafford St + Green Lane one way

8. Transport, Movement and Accessibility

This chapter looks at all aspects of movement into and around the town centre, including pedestrian movement, cycling, public transport, taxis and car parking. There are key questions around what streets could be pedestrianised, the location of a larger transport hub in the centre and the possibility of creating 'super car parks'.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. T:Q11	Comments
T Q1	Support Option 1, STRONGLY OPPOSE Option 2.
T Q5	Option 2. Bridge in Bridgeman St is a major obstacle.
T Q6	New facility MUST have far greater capacity than the current Bradford Place. Move bus routes to Wolverhampton + Willenhall could be diverted here thus reducing congestion at St Pauls Bus Station STRONGLY OPPOSE The Bridge being depedestrianised.
T Q7	Metro SW's route is unrealistic. Restore original plans for trams from Wednesbury to Brownhills via Walsall.
T Q8	Relocate station to Hatherston Rd. With electrification of the Chase Line, London Midland will divert Birmingham to Liverpool service via Walsall. Will enhance use by students at Walsall College and avoid major disruption of Saddlers Centre.
T Q10	Option 3 T Q11 Yes, New Station & bus station
12 T14	} Option 1

9. Walsall Town Centre – A Place for Investment

This chapter asks questions around the approach of promoting the Big Three (St. Matthew's Quarter, Gigaport, and Waterfront) and Park Street as the key areas for development in the centre and what uses should be located in these areas. This chapter also includes the 'Key Decisions' map where we have identified the sites where we think there are important choices to be made. These are the issues where we really want your views as we think they hold the key to the future of Walsall Town Centre.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. INV:Q4	Comments
INV Q1	Option 5
INV Q3	Leather museum, museum + local history centre
INV Q8	Relocate market to indoor option
INV Q9	Retail/Leisure/entertainment
INV Q10	Station St Loo (+ coach?) station. NOT Jerome
	Retail Park - too far from town centre
INV Q11	Rail station - relocate
INV Q13	Leisure/hotel/conferencing
INV Q14	Leisure/entertainment
INV Q15	Pedestrianise Wilkeshampton St to roundabout
	Green Lane + Stafford St to Ring Road made
INV Q17	one way - one towards town centre ^{centre} , other away.
INV Q18	Option 2
	Option 4

Any other comments...

Our top priority would be to oppose any attempt to allow any traffic on The Bridge. We use The Bridge every Good Friday for drama and worship. We sometimes use it at other times. This is a perfect outdoor venue. At the request of Brian Pell, we wrote in support of external funding for the present pedestrianization. Our second priority, is to move the market ideally to an indoor venue.

Landowners, Developers & Agents

Our Ref: 4593
Your ref:

3rd Floor
54 Hagley Road
Edgbaston
Birmingham
B16 8PE

3rd June 2013

Tel: 0121 456 7444
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Planning Policy Team
Regeneration Directorate
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Civic Centre
Darwall Street
Walsall
WS1 1DG

support@alliance-plan.co.uk
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Email: gs@alliance-plan.co.uk

Dear Sirs

WALSALL TOWN CENTRE AREA ACTION PLAN ISSUES AND OPTIONS REPRESENTATIONS – LAND AT THE LITTLETON CENTRE, WISEMORE, WALSALL

Alliance Planning has been appointed by the Cordwell Property Group to make representations on the Walsall Council Issues and Options paper for the Walsall Town Centre Area Action Plan (AAP).

Cordwell Property Group positively supports a Walsall Town Centre that is vibrant and an AAP that provides a framework that acts as a catalyst to encourage future regeneration and investment. Unfortunately, the AAP in its current form adopts a negative approach that restricts market forces and discourages ambitious and innovative proposals. This is contrary to the National Planning Policy Framework (NPPF) and the 'General Criteria' at Table A12 of the AAP, nor does it reflect the highly sustainable setting of an inclusive Town Centre as a single location rather than a series of individual sites. Our Client agrees that a Plan led approach is the correct route but not in a manner that seeks to limit development through the creation of arbitrary preferences for individual uses on individual sites that will only lead to Town Centre sites remaining undevelopable and offering no assistance to the vitality and viability of the overall Town Centre.

Cordwell Property Group

Cordwell Property Group has been actively involved in the continued investment in and success of Walsall as a Town Centre over the years and currently has submitted a £12M scheme for the regeneration of the Littleton Centre Site at Wisemore, Walsall. The scheme proposes the development of a multi-screen cinema plus associated restaurant, café, retail and other town centre uses. The planning application (Ref: 13/0206/FL), is due to be considered by the Walsall Planning Committee on 20th June 2013. The Site is within the defined Town Centre and is surrounded by a mix of town centre uses, including a Tesco superstore (Use Class A1) and petrol filling station to the east, with access taken off Wisemore. A Site Location Plan is attached for ease of reference.

National Planning Policy Framework

Paragraph 6 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. The role of plan-making is to enable the planning system to positively contribute to the building of a strong, responsive and competitive economy, by ensuring that sufficient land (more than one site) of the right type is available in the right places

(sequential approach to support proposals anywhere in a town centre) and at the right time to support growth and innovation (avoid the sterilisation of sites through overly prescriptive allocations).

Paragraph 17 states that a set of twelve core land-use planning principles should underpin both plan-making and decision-taking. These principles include that planning should:

- Be genuinely plan-led, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.
- Not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives;
- Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs: *“Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.”*

Paragraph 23 states that town centres should be recognised as the heart of communities, and *“planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period”* (author’s emphasis). Local planning authorities should locate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. Such needs should be met in full, but not be compromised by limited site availability.

Similarly, Ministerial advice has noted in the past that considerations of commercial competition are not planning matters (para 29 of the then adopted PPS1). This matter has been considered in a number of cases, notably, the ‘Aberconwy’ case in 1984, which concluded that it was not the function of planning to prevent competition between private interests.

Paragraph 150 states that Local Plans are key to delivering sustainable development that reflects the vision and aspirations of local communities and that planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise, as stated at Section 38(6) of the Planning and Compulsory Purchase Act 2004. Paragraph 173 states: *“pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.”*

Development Plan

The Development Plan for the Site comprises the approved Black Country Core Strategy (2011) and relevant saved policies of the Walsall Unitary Development Plan (UDP) (2005).

For the purpose of the relevant saved policies of the UDP, the subject Site at Wisemore is identified as being an appropriate location for further development of the Walsall College of Art and Technology. However, whilst this policy remains saved, a subsequent grant of outline planning permission on 15 December 2006 for the demolition of existing buildings and erection of replacement college facilities (planning class use D1), on land north of Littleton Street West, retail (planning use class A1), including a food store, residential (planning use class C3), office (planning

use class B1a), petrol filling station and car parking on land south of Littleton Street West, means of access and other associated works effectively accepted that the subject Site was appropriate for alternative uses, and the college facilities were provided to the north of Littleton Street West in any event.

The Black Country Core Strategy (BCCS) (2011) sets out a number of sustainability principles: Facing up to Climate Change; Sustainable Development; Social Inclusion; Brownfield First; and a Comprehensive Approach to Development.

The BCCS Spatial Objectives follow from the sustainability principles and state that by 2026 the Core Strategy will have helped to deliver:

- Focused investment and development in comparison shopping, office employment, leisure, tourism and culture within the four Strategic Centres: Brierley Hill, Walsall, West Bromwich and Wolverhampton, to retain and increase their share of economic activity and meet the increasing aspirations of their catchment areas
- A network of vibrant and attractive town, district and local centres, each offering an appropriate choice of facilities
- A first class transport network providing rapid, convenience and sustainable links between the Strategic Centres, existing and new communities and employment sites
- A sustainable network of community services, particularly high quality lifelong learning, health care and sport and recreation facilities.

Policy CSP1 of the Black Country Core Strategy identifies Walsall as a Strategic Centre. Strategic Centres should be the principal locations for major cultural, leisure, entertainment and community facilities and therefore should provide major new leisure and cultural facilities.

The Vision for Walsall Town Centre for 2026 as set out in the BCCS is: *“A regenerated focus for the local economy and community, which provides its catchment area with an attractive choice of comparison shopping and cultural facilities, and supports a thriving office market and urban living. All activities are supported by a vibrant, safe, attractive and accessible environment that successfully combines local heritage with modern design.”*

Policy SC3.3 identifies that within Walsall Strategic Centre, there are opportunities for leisure, residential and office developments at both the subject Site (in the Gigaport area) and at the Walsall Waterfront. It is noted that whilst the subject Site was identified in the overall Gigaport area it was outside of the subsequent redline boundary and Masterplan for the planning permission for the development of the area.

Policy SC3.5 states that there is a need for further leisure facilities and venues to serve all sections of the community and boost the evening economy in Walsall. It is highlighted that there is no cinema and no major entertainment venue. A need for hotel and conference facilities is also identified.

Background Reports and Evidence

Background evidence documents which informed the West Midlands Spatial Strategy identified an under provision of leisure facilities. The Long Term Economic and Employment Strategy for the Black Country (February 2005) identified a lack of cinemas in Walsall Town Centre and the 2006 West Midlands Regional Spatial Strategy – Black Country Centres Study Report concluded that with the predicted growth in the leisure sector, including cinema visits, there was already scope for additional multiplex cinemas in the Region by 2021, including at Walsall.

The Town Centre Area Action Plan (AAP) Issues and Options – Representations

The representations made to the Issues and Options Paper for the AAP are set out in the form of this letter. The representations have been formulated based upon a detailed knowledge of the local property and investment market. These representations follow the specific reference to the Chapter and the relevant questions of the Issues and Options Paper. Reference is also made where appropriate to the 'reasonableness' criteria set out at Appendix 2 of the AAP.

Chapter 1: Introduction

The purpose of the Walsall AAP is to *“allocate sites within the town centre for the development of new shops, leisure opportunities and offices for the town centre, as well as setting out strategies for other aspects of the town centre, including transportation and the environment.”* The AAP is required to be in conformity with the Black Country Core Strategy (2011), which sets out the vision for the future of Walsall up to 2026.

Comment:

The BCCS states that there is a need for further leisure facilities and venues to serve Walsall and stated that there is no cinema in the Town Centre. However, no specific targets for leisure development are set out and whilst a vision for the Town Centre is welcomed, the prescription of specific sites for development is not agreed with. The allocation of specific sites for development would be unreasonable and would be contrary to the objectives of the BCCS (GEN10).

Chapter 3: The Vision for Walsall Town Centre

Question AV: Q2 – Do you agree with the AAP objectives? If you disagree, why?

The AAP proposes 10 objectives for the future of Walsall Town Centre. The relevant objectives that Cordwell Property Group wishes to refer to are detailed below:

“1. Establish and allocate a series of high quality, ambitious and deliverable proposals for Walsall Town Centre that will enable Walsall to maximise its economic potential creating a thriving and prosperous centre that creates job opportunities for the residents of the Borough”.

Comment:

It is agreed that Walsall should seek to boost the prosperity and economy of the Town Centre, but no single site should be allocated for specific uses, instead a range of sites should be identified, to allow for flexibility and deliverability with regard to external factors such as market conditions. Allocating specific sites would be 'unreasonable' with reference to criteria GEN7, GEN8 and DEL12.

“2. Enhance and maximise Walsall’s competitiveness for investment, both in its role as a sub-regional centre and in respect of competing with out-of-centre development”.

Comment :

To attract investment the Town Centre needs to demonstrate flexibility and a positive approach to planning, to ensure development can occur not only in a suitable location but one which also makes the development viable.

“5. Strengthen the cultural offer through increasing the mix of uses within the town centre such as a cinema, performance venues and community facilities (e.g. weddings and banqueting facilities),

complemented by leisure uses such as restaurants, cafes and bars in order to provide an attractive centre for visitors both day and night”.

Comment :

Whilst this objective is welcomed, it conflicts with Objective 1 which suggests that sites should be allocated for the uses referred to. It is considered that town centre uses in a town centre location should be considered acceptable in principle and the AAP should not be overly prescriptive about locations for various uses as this would reduce the flexibility of the Town Centre to adapt to changing market circumstances and therefore conflict with the NPPF which seeks to encourage positive planning. Allocating sites for development would fail the ‘reasonableness’ test criteria of GEN7 and GEN8.

7. Improve accessibility to and within the centre for all sectors of the community, through the provision of integrated transport and enhanced cycling and pedestrian links.

Comment :

This objective is agreed and welcomed. Within the Town Centre certain sites will be more suitable to various development than others, with reference to their location, pedestrian flows and accessibility and such factors are considered by the market in pursuing sites for development. Allowing developers flexibility and choice in location will ensure that development comes forward which accords with appropriate market conditions.

Question AV: Q3 – Are there any other objectives that should be considered as part of the AAP?

Comment :

Objective 1 could be reworded in light of comments made about site allocations and flexibility:

1. Establish a range of sites within the Town Centre that would provide suitable, deliverable options for the future development of Town Centre uses to enable Walsall to maximise its economic potential, creating a thriving and prosperous centre that in turn leads to the creation of job opportunities for the residents of the Borough.

Chapter 6 Walsall Town Centre – A Place for Leisure

Question L:Q23 – Which of the above options do you agree with most, and why?

Comment :

Section 6.8 of the Issues and Options Paper identifies a range of leisure / entertainment facilities for Walsall the provision of which should be facilitated by the Council. These include a cinema, bowling alley, ice rink, bingo hall and casino. The AAP states that the location of new leisure development in the town needs to be considered given the *“dearth of leisure options’ in the town centre.”* And the *“latent demand”* that has been identified for cinema provision in Walsall. Such facilities should be located in the town centre where they are easily accessible by public transport. The AAP sets out three options for the location of new leisure developments in Walsall Town Centre.

In response to Question L: Q23, Option 3 is agreed with. A range of Town Centre sites should be considered for the accommodation of Town Centre developments, encouraging choice in location for developers, investment in the Town Centre and thus promoting a positive planning system which meets the development needs of the area and which can approve sustainable development without delay, in accordance with the NPPF.

Options 1 and 2 would be too prescriptive in terms of site allocation. Allocating specific sites for development rather than identifying a range of suitable sites is contrary to NPPF guidance and also the BCCS, which suggests that leisure uses could be suitably accommodated in more than one Town Centre location. The AAP should therefore identify broad locations for the development of leisure developments and avoid overly prescriptive site allocations which could potentially sterilise sites. Options 1 and 2 are therefore considered to fail the 'reasonableness' test with specific reference to criteria GEN1, GEN7, GEN8 and GEN10.

Question L: Q25 – Where do you think is the best location for such facilities, especially the Cinema?

Comment :

A planning application (ref: 13/0206/FL) is currently before the Council for the development of a multi-screen cinema (Use Class D2) plus additional commercial units for retail, cafes, restaurants and hot food takeaways (Use Classes A1, A3, A4 and A5) plus associated car parking, access, landscaping and public realm improvements on land at Wisemore, Walsall (the subject Site). The Site is within the Town Centre and, therefore, a suitable location for the proposed use. The Site also attracts high pedestrian footfall being located on the junction of Littleton Street and Days Street, which is well trafficked by pedestrians who are able to utilise the existing junction and crossings. On this basis and alongside other planning considerations, our client's Site is a proven suitable location for a cinema development and should be allocated as such in the event that our client's comment for there to be no allocations is not accepted.

Walsall Council identified the need for a cinema in 2005 and the Walsall UDP (2005) indicated that the Waterfront Site was identified as the only appropriate location at that time. However, no such development came forward during the UDP Plan period. The current BCCS only identifies the Town Centre, and the Council now has two planning applications for cinema uses. In reference to the AAP, it is therefore suggested that the location of a cinema in the Town Centre should not be allocated.

Chapter 9: Walsall Town Centre – A Place for Investment

Question INV: Q1 – which of the above options do you agree with, and why?

Comment :

The AAP Issues and Options Paper considers some Town Centre sites in terms of their potential for future development. It is noted that much of the regeneration in the town centre in recent years has focused around the 'Big Three' development opportunities: St Matthew's Quarter, Gigaport and Waterfront. The AAP sets out five options for development in the Town Centre and on the 'Big Three' sites.

In response to Question INV: Q1, none of these options are agreed with, they are all prescriptive and could prevent other suitable sites coming forwards for development in the Town Centre. This proposed approach would prevent competition and potentially sterilise sites, contrary to the NPPF. The options are all considered to fail the 'reasonableness' test with reference to criteria GEN1, GEN7 and GEN8.

Questions INV: Q3 – Q16: do you have any views on any of the key decisions shown on the map below? If yes please state which you are responding to clearly.

Comment:

There are sites identified at Figure 9.1 which are not discussed within the rest of the Chapter or indeed the document. This results in a confusing document, and the omission of sites from

consideration entirely despite their identification at Figure 9.1. On this basis the Issues and Options paper fails the 'reasonableness' test on criteria DIS6 and DEL8. All sites referred to both in Figure 9.1 and indeed across the entire document should be fully appraised in the context of their Town Centre location.

Question INV: Q21 – Which of the above options do you agree with most, and why?

Comment :

The AAP notes that the Gigaport area has evolved as the preferred location for office investment due to the availability of under-utilised land. The Gigaport Masterplan and outline planning permission aim to deliver a mix of uses, mainly offices (Use Class B1a) plus associated ancillary and complementary uses. It is noted that the Cordwell Property Group site (AAP21) is defined as a 'Gigaport site' but it is outside of the defined Masterplan area and redline planning permission boundary for this location. In response to Question INV: Q21 none of the options are agreed with. The Gigaport area, being an established office accommodation site should continue to deliver office development but this should not prevent other uses from coming forwards in this location where they would be complementary to the primary function of the locality and could be pursued in response to market demand and the NPPF. The suggested objectives in the AAP fail the 'reasonableness' test with reference to criteria GEN6, GEN7 and GEN8.

Question INV: Q26 - Which of the above options do you agree with most, and why?

Comment :

Section 9.4.3 states that the Waterfront (North) is the location where the Council has sought to attract leisure development in the town centre and the aspiration to deliver a cinema in Walsall is reiterated. The Paper offers two options for development on the Waterfront Site. Option 2 is agreed with: The Waterfront North site should be considered a suitable location for any town centre use, allowing for the promotion of sustainable, competitive development, in accordance with the NPPF and the BCCS. In addition, by allowing for a range of uses on the Waterfront North Site the AAP would also reflect the BCCS, which states that the Waterfront North site should accommodate some of the office floorspace target for Walsall across the Plan period. Option 1 in the AAP only allows for leisure facilities and is therefore contrary to the BCCS. It would be overly prescriptive and could result in the sterilisation of land, failing criteria GEN8 and GEN10 of the 'reasonableness' test.

Question INV: Q27 – Which of the above options do you agree with most, and why?

Comment:

The Waterfront Lex site has also been suggested as a suitable site for leisure facilities in the AAP and Option 3 is considered appropriate for the future development of the Site, in effect that the Site could accommodate a range of town centre uses. Allocating sites for specific uses prevents competitive town centre environments, contrary to the NPPF, and conflicts with the AAP's own objectives, particularly Objectives 1 and 5. Options 1 and 2 for the Lex Site therefore fail the reasonableness test on criteria GEN7 and GEN8.

Chapter 10 – Walsall Town Centre – The Sites

Question SI: Q1 – Have we considered all possible sites? If not, what sites have we missed and what do you propose is the possible use for this site?

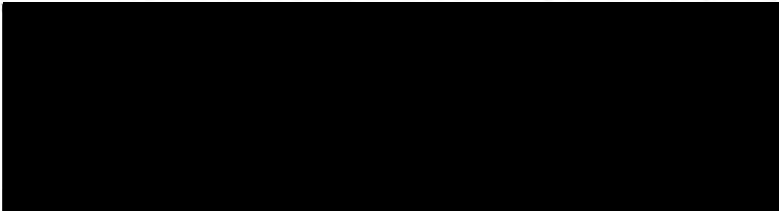
Question SI: Q3 – Do you have any comments or further information on any of the sites we have listed in the summary tables?

Comment:

Chapter 10 refers to all sites considered as part of the AAP process at Appendix 1, but the summaries are split into chapters, which accord with the AAP Issues and Options document. On this basis, some sites appear in more than one place within Appendix 1, and appear to be considered appropriate for different types of development in each case. For example Site ref: AAP21: Land to the west of Wisemore appears in both Table 3 and Table 6. In Table 3 it is considered as a possible location for a cinema but in Table 6 it is noted only as a high profile development opportunity, with no reference to the cinema. On this basis the AAP fails the tests of 'soundness' set out in the NPPF as sites have not been objectively assessed, criteria GEN2 of the 'reasonableness' test applies. All sites considered should have been looked at on the basis that they are Town Centre sites, and then with reference to the type of development which could be appropriate on each site, having regard to the tests and criteria set out in the NPPF.

Each site should be presented in the form of a matrix in order that a robust and reasonable quantitative and qualitative assessment of each site can be undertaken. Until this is completed and the results published, the AAP remains unsound and consultations should cease.

Should there be any queries on the representations submitted in respect of the Walsall Town Centre Issues and Options AAP please do not hesitate to contact me. Please also take this letter as confirmation of my interest in being consulted again as this document progresses.



Gerald Sweeney
Director

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Unique reference number

(if you have received a letter or email about this consultation please state the unique reference number here)

Please place an X in the one box that best describes you / your role in completing this consultation:

Resident or Individual		Local Authority	
Business		Public service provider e.g. education establishment, health etc	
Developer or Investor		Public agency / organisation	
Landowner		Statutory Consultee	
Planning Agent or Consultant	x	Charity	
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation			

1. Introduction, 2. What is Walsall Town Centre? and 3. The Vision for Walsall Town Centre

The introduction sets out what the Area Action Plan is, the structure of the document and the planning context. It also explains about the Sustainability Appraisal of the plan, which you can also comment on. Chapter 2 gives an introduction to the context of Walsall town centre by looking at its location and role within the wider Borough. It also covers the key challenges which are facing the town centre. This chapter includes questions and options around the proposed boundary for the AAP for your consideration. The third chapter introduces the vision and objectives for the town centre before asking if this aligns with your aspirations for Walsall.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. TCB:Q1	Comments
AV: Q2	Please see accompanying letter of representation – pages 4-5
AV: Q3	Please see accompanying letter of representation – page 5

6. Walsall Town Centre – A Place for Leisure

This chapter looks at the current leisure, cultural and community facilities in the town Centre. It asks crucial questions about the location for a cinema and around the future of the Gala Baths. There are also some questions around maximising canalside locations in the town centre, the evening economy and the overnight accommodation offer.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. L:Q19	Comments
L:Q23	Please see accompanying letter of representation – pages 5-6
L: Q25	Please see accompanying letter of representation – page 6

9. Walsall Town Centre – A Place for Investment

This chapter asks questions around the approach of promoting the Big Three (St. Matthew's Quarter, Gigaport, and Waterfront) and Park Street as the key areas for development in the centre and what uses should be located in these areas. This chapter also includes the 'Key Decisions' map where we have identified the sites where we think there are important choices to be made. These are the issues where we really want your views as we think they hold the key to the future of Walsall Town Centre.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. INV:Q4	Comments
INV: Q1	Please see accompanying letter of representation – page 6-7
INV: Q3- INV: Q16	Please see accompanying letter of representation – page 7
INV: Q21	Please see accompanying letter of representation – page 7
INV: Q26	Please see accompanying letter of representation – page 7
INV: Q27	Please see accompanying letter of representation – page 7

10. Walsall Town Centre – The Sites

This chapter is all about the sites that make up the opportunities in Walsall Town Centre. It includes a summary of where the sites have come from including an overview of the 'Call for Sites' process. It asks questions about whether we have considered all relevant sites and asks if you have any more information on the sites that we should take into consideration. The section finishes by looking at the constraints we need to consider when assessing site suitability.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. SI:Q2	Comments
SI: Q1	Please see accompanying letter of representation – page 8
SI: Q3	Please see accompanying letter of representation – page 8

(1) It's important to safeguard industrial land from housing – otherwise there won't be enough jobs for people who live here, and then they'd have to commute out. However, the Green Belt should not be impinged on.

(2) In the past there have been businesses in Walsall that have been blighted by the proposed Midland Metro and this has caused them delay investment. It's important that these type of transport schemes should not continue to blight businesses.



**REPRESENTATION MADE IN RESPONSE TO THE WALSALL TOWN CENTRE
AREA ACTION PLAN – ISSUES AND OPTIONS CONSULTATION**

Submitted on behalf of

AEW UK

June 2013

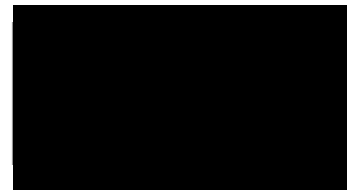




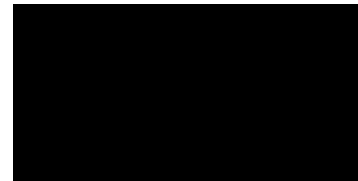
PROJECT:
Response to Walsall AAP

DATE ISSUED: June 2013
JOB REFERENCE: 1615/5179

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- 9.0 RESPONSE SUMMARY**

1.0 INTRODUCTION

- 1.1 Brooke Smith Planning Consultants Ltd. is instructed by AEW UK to prepare and submit representations to the Issues and Options consultation for the emerging Walsall Town Centre Area Action Plan (AAP).
- 1.2 It is understood that the AAP is a long term plan, which will allocate sites within the town centre for the development of new shops, leisure opportunities and offices for the town centre, as well as setting out strategies for other aspects of the town centre, including transportation and the environment.
- 1.3 The AAP is integral to the delivery of objectives set out in the National Planning Policy Framework (NPPF), which recognises town centres as the heart of local communities. The NPPF advises that Council's should pursue policies to support their viability and vitality. This role is key for the AAP and should drive the policies it sets out.
- 1.4 AEW UK owns and manages the Jerome Retail Park, located in the south of the town centre. In light of this, AEW UK welcomes the opportunity to be involved in the development of the AAP and the future plans for Walsall Town Centre. **The following comments therefore form AEW UK's formal representations to the AAP Issues and Options report.**

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C/o Brooke Smith Planning,

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Postcode: B15 1NP**Email Address:** ac@brookesmithplanning.com**Phone Number:** 0121 693 8900

Please place an X in the one box that best describes you / your role in completing this consultation:

Resident or Individual		Local Authority	
Business		Public service provider e.g. education establishment, health etc	
Developer or Investor		Public agency / organisation	
Landowner		Statutory Consultee	
Planning Agent or Consultant	X	Charity	
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation			

3.0 CHAPTER 1. INTRODUCTION, CHAPTER 2. WHAT IS WALSALL TOWN CENTRE & CHAPTER 3. THE VISION FOR WALSALL TOWN CENTRE

AV:G1 Do you agree with the vision? If not, why not? What is your vision for the Town Centre

- 3.1 AEW UK agrees with the proposed vision for Walsall town centre, as set out on page 33 of the consultation document. Key to Walsall's successful regeneration will be the provision of good quality and sustainably located retail and leisure sites which contribute to the vitality of the town centre.

AV:Q2 Do you agree with the AAP objectives? If you disagree, Why?

- 3.2 AEW UK agrees with the 10 objectives for the future of Walsall town centre. In particular objective 3, which aims for an increase in the choice, quality and diversity of the town centre retail offer, is supported by AEW UK. It is considered that the Jerome Retail Park has an important role in helping fulfil that objective.

AV:Q3 Are there any other objectives that should be considered as part of the AAP?

- 3.3 No additional objectives are required. However, as set out in the NPPF '*Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period*' (paragraph 23). These aims must be fully addressed by the AAP.

4.0 CHAPTER 4. WALSALL TOWN CENTRE – A PLACE FOR SHOPPING

S:Q1 What do you think of the current shopping experience in the town centre? What can be done to improve the experience?

- 4.1 The current centre of Walsall is a thriving retail area, well used by the local population. However, the retail offer could be much improved which would further enhance and strengthen Walsall's status as a Strategic Centre, as defined by the Black Country Core Strategy (BCCS).
- 4.2 As set out in the 'West Midlands Regional Centres Study', produced by GVA Grimley in 2009, Walsall requires a minimum of 14,000 sqm net (20,000 sqm gross) additional retail floorspace up to 2021. A maximum requirement of 32,000 sqm net (40,000 sqm gross) up to 2021 was also recommended. The provision of this retail space is essential for the ongoing regeneration of the town centre.
- 4.3 Not only is additional floor space required but there also needs to be flexibility within the town centre to enable and encourage a diverse range of operators, both convenience and comparison retail, including food retail.

S:Q2 How much impact does the variety of shops available in Walsall have on the attractiveness on the town centre as a place for shopping?

- 4.4 Retail variety is key to the promotion of Walsall as a Strategic Centre. The latest retail market research carried out by Savills ('Market in Minutes' Savills World Research, May 2013 www.savills.co.uk/research) demonstrates that over recent years the strongest market has been the high quality, luxury retail market. As such Walsall should look to encourage the best range of retail provision within the town centre.
- 4.5 In particular, as set out in Policy CSP1 of the BCCS, the provision of additional comparison retail floorspace will help strengthen the Strategic Centres.

S:Q3 Should the AAP explore issues around the number of some uses in the town centre such as hot foot take-away outlets or betting shops?

- 4.6 Yes, the control of such uses is an important part of improving the overall retail and leisure offer of the town centre.

S:Q4 Which of the above options do you agree with most, and why?

S:Q5 Do you think the primary shopping area needs to be changed? If so how?

- 4.7 AEW UK supports Primary Shopping Area (PSA) **Option 2 ‘Expand the current PSA boundary’**. The possible implications of this option, as set out on page 28 of the consultation document, have been considered. However, only a relatively minor extension is proposed to the PSA. As shown in figures 1 and 2, it is requested that the PSA be extended to include the whole of the Jerome Retail Park.
- 4.8 It is noted that subsequent proposals in the consultation document refer to the ‘front and ‘rear’ of the Jerome Retail Park as separate areas. It is assumed that the ‘front’ area is included in the existing PSA, while the ‘rear’ lies just outside.
- 4.9 As an established retail area within Walsall town centre it would seem logical to expand the PSA to include the whole of the Jerome Retail Park site. This inclusion would help to boost the existing retail provision offered on site and the overall contribution that the retail park makes to the town centre.

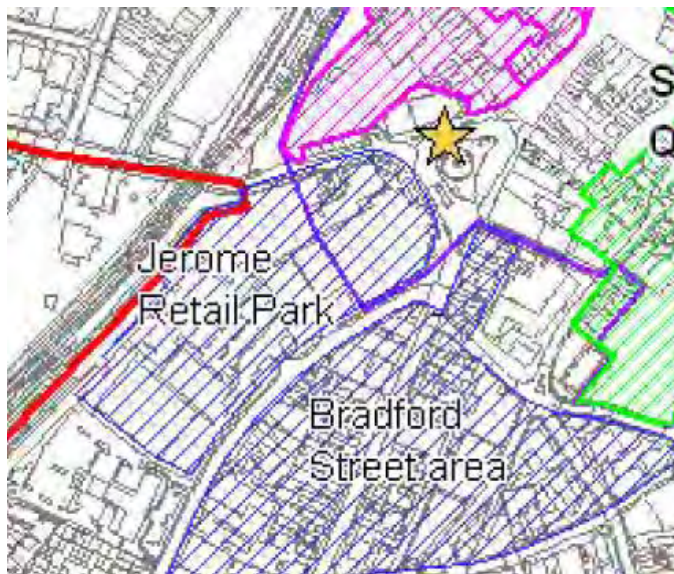



Figure 1 – Extract from Figure 4.1 Key Town Centre Areas





Figure 2 – Proposed Primary Shopping Area boundary (extension to include the entire Jerome Retail Park area)

 Proposed Boundary

- 4.10 The retail park is located in extremely close proximity to both the railway station, the Saddlers Centre and to Park Street (recognised as the heart of the town centre by the AAP consultation report). Therefore, the extension of the PSA to include the centre would not have a negative impact on the Council's aim to concentrate shopping investment within the heart of the town centre.
- 4.11 The extension of the PSA to include the entire retail park would potentially enable the provision of larger retail units in an extremely centre location. This would not result in a shift of investment away from the Park Street and St Matthew's Quarter. Instead it would be a rational extension to these core retail areas.

S:Q6 What approach can the AAP use to allow development outside of the PSA boundary once all development opportunities have been maximised?

- 4.12 Even if the PSA boundary remains unchanged, then it is maintained that the entire Jerome Retail Park is a key development opportunity that should be maximised. AAP82 'Jerome Retail Park rear' is shown as a potential development opportunity within the town centre.
- 4.13 As stated previously, the Jerome Retail Park forms a natural progression to the existing core retail areas of the town centre and as such the AAP should follow a positive approach to allowing development outside of the PSA in such sites. A

clear, bespoke allocation for the retail park would enable control development in accordance with the aims of the AAP.

S:Q7 The current PSA policy places no restriction on other town centre uses within the defined area. Do you agree with this approach or should the AAP look to control the uses within the PSA further?

- 4.14 The AAP should not be overly prescriptive and as such it is considered that the current lack of restrictions over other town centre uses is the appropriate way forward. This will enable assist in enhancing the overall viability and vitality of the town centre.

S:Q8 Which of the above do you agree with most, and why?

- 4.15 AEW UK agrees most with '**Location of New Retail Option 2: Once opportunities have been maximised for Park Street and St. Matthew's Quarter, development opportunities elsewhere in the town centre will be allocated for retail development**'. This option protects the key PSA areas of Park Street and St. Matthews Quarter, while enabling future growth and development. However, it is stressed that this view is based on the Jerome Retail Park being included within the PSA and considered as being a natural extension to the existing retail core area.

S:Q9 Where should we deliver the 85,000sqm of new comparison retail floorspace set as a target in the BCCS? Do you agree with the sites we have identified in Table 1 (Appendix 1) as potential retail development opportunities? What sites have we missed?

- 4.16 It is considered that the Jerome Retail Park should be included in Table 1 (Appendix 1) which sets out potential retail development opportunities. The following text is proposed for inclusion:

AAP ref.	Site Name	Appox Site Area (sqm)	Current use	Current preferred use by the Council	Potential for additional A1 or B1 Floorspace	Reasons for considering option
AAP82 & AAP83	Jerome Retail Park Front & Rear	26,650	Retail and Leisure (A1 and D2)	Retail with car park and Leisure provision	PSA to be extended to include both the front and rear sections of the retail park	The layout and buildings of the retail park are showing age and detracting from the War Memorial and other high quality buildings in Bradford Street. A comprehensive refurbishment of the park would expand the high quality retail provision in the town centre.

5.0 CHAPTER 5. WALSALL TOWN CENTRE – A PLACE FOR BUSINESS

B:Q1 What type of offices should be delivered?

B:Q2 What can we do to create demand for offices and a strong business environment?

- 5.1 It is noted that much of the in-centre office market is predominately outdated 1960s/70s stock, which is badly configured and is unsuitable for modern office occupiers. Therefore, the need for new high quality office space within Walsall town centre is recognised.
- 5.2 It is considered that the provision of such office space in suitable locations within and close to Walsall's town centre would help to revive the local office market and attract new occupiers into the area.

B:Q3 Which of the 'Location of New Offices' Options do you agree with most, and why?

B:Q4 How can we ensure Gigaport links well with the rest of the town centre?

- 5.3 'Option 1: The Gigaport remains the prime location for office development in Walsall town centre' is considered to be the most appropriate location for new B1(a) schemes. As set out in the consultation document the Gigaport is an accessible and attractive location, which will be a focused business area that connects well to the town centre.

B:Q5 Are there any other locations where we should encourage major new office development within the town centre?

- 5.4 It is noted that AAP82 'Jerome Retail Park Rear' and AAP83 'Jerome Retail Park Front' lists the Council's preferred use for the site as being '*leisure, offices, retail and super car park*'. As set out previously it is considered that the whole of the Jerome Retail Park should be included in the PSA and as such the focus of the park should be retail, as is the current situation.
- 5.5 As a site located on the opposite side of the retail core to the Gigaport area, the construction of offices at Jerome Retail Park would not contribute to the proposed office core area at Gigaport. The main focus for the park should be retail and associated leisure uses.

6.0 CHAPTER 6: WALSALL TOWN CENTRE – A PLACE FOR LEISURE

L:Q2 What sort of sport, leisure, and active recreation facilities do you think should be provided in the town centre?

L:Q5: Do we need to allocate for protection any of the facilities identified on Figure 6.1 and Table 8 (Appendix 1)? If yes, Why?

- 6.1 It is noted that the existing Gala Bingo site in the rear section of the Jerome Retail Park is listed as a current 'commercial, leisure and entertainment facility' in the consultation document (figure 6.1 and Appendix 1, Table 8 ref. AAP82).
- 6.2 It is not considered that the Gala Bingo premises require protection by way of a site specific allocation. The allocation of the whole of the Jerome Retail Park within the PSA would still allow the existing leisure activities to operate in that unit and would not specifically preclude any improvements or extensions to the leisure operations on site, subject to the granting of specific planning consents.
- 6.3 Additionally, the allocation of the entire retail park within the PSA would not preclude the development of A3 and A4 uses on site, subject to specific planning consents being granted. Such uses could potentially compliment retail provision within the park and increase visitor numbers.

7.0 CHAPTER 8: TRANSPORT, MOVEMENT AND ACCESSIBILITY

T:Q5 Which of the public transport options do you agree with most, and why?

- 7.1 It is noted that the proposed 'Public Transport Option 3' involves the redevelopment of Bradford Place Interchange to create larger capacity by expanding into Jerome Retail Park. The consultation document considers that this option would create extra capacity and would improve passenger experience, safety and the reliability of services. However, it is noted that such changes would have implications for neighbouring land uses.
- 7.2 AEW UK, as owner of the Jerome Retail Park, is interested in entering into discussions with Centro and Walsall Council with regards to how part of the retail park could be used to extend the existing Bradford Place Interchange. Such a development could present an existing opportunity to provide a new transport hub with interconnected retail and leisure facilities on the Jerome site.

T:Q14 Which of the car parking options do you agree with most, and why?

T:Q15 Where should car parks be located to cater for the regeneration of the town centre?

- 7.3 It is noted that both the front and rear areas of the Jerome Retail Park are earmarked by the Council as locations for 'super car parks'. The existing car parking area at the retail park offers a significant level of car parking serving both the park and the rest of the town centre. AEW UK does not object to this existing parking being recognised as a 'super car park' serving the town centre, as set out in Car Parking Option 2.

8.0 CHAPTER 9: A PLACE FOR INVESTMENT

- 8.1 It is noted that the Council is aiming to focus regeneration around the 'Big Three' development opportunities in Walsall – St. Matthew's Quarter, Gigaport & Waterfront and Park Street. It is considered that the Jerome Retail Park forms a logical extension to the Park Street area.

INV:Q30 Which of the Park Street options do you agree with most, and why?

INV:Q31 How can we reinvigorate Park Street and its shopping centres?

INV:Q32 Are there any other uses we should be promoting here?

- 8.2 The consultation document's recognition of the Park Street area as the key retail area of Walsall is welcomed. It is considered that the Jerome Retail Park contributes to this area, along with the Saddler's Centre and Park Place Shopping Centre. In particular, the retail park offers large retail units which compliment the small units provided within the Park Street area.

- 8.3 As such the further development of Park Street as a focused retail area is supported, as set out in Option 1. Park Street should form the key linkage between the Jerome Retail Park, Saddler's Centre and Park Place Shopping Centre, thus forming a cohesive retail core for the town.

INV:Q33 De you agree with the proposals for each of the other development opportunities noted?

Inv:Q34 What other uses should be considered for the site?

- 8.4 The inclusion of the Jerome Retail Park as a 'development opportunity' is welcomed by AEW UK. However, as set out in the consultation document, the Council considers that:

'The presence of Gala Bingo is a potential anchor for leisure uses and the site is dominated by older bulky/discount goods as well as a food operator. The front of the site may be better used for highway or a bus interchange but the development overall could become detached and alternative uses should be considered' (9.6.1).

- 8.5 It is considered that the retail park makes a valuable contribution to the retail offer in Walsall, by providing a series of larger units for bulky goods and food retail. As set out earlier in this section, the retail park has the potential to form a

key part of the Park Street retail area. Therefore, AEW UK would not wish the park to be earmarked for specific alternative, non-retail uses, as suggested in paragraph 9.6.1 of the consultation document. Flexibility is considered key to ensuring the ongoing successful operation of the retail park and its positive contribution to Walsall town centre.

- 8.6 Such a flexible approach is supported by the National Planning Policy Framework, which aims to *'promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres'* (paragraph 23).
- 8.7 Additionally, as previous set out, AEW UK would welcome an opportunity to discuss the potential for expanding the bus interchange into the retail park site.

9.0 RESPONSE SUMMARY

- 9.1 As owner and manager of the Jerome Retail Park, AEW UK located welcomes the opportunity to be involved in the development of the AAP and the future plans for Walsall Town Centre.
- 9.2 The Jerome Retail Park is one of the key retail areas within the town centre, offering larger units for bulky goods and food retail in a location adjacent to the existing retail core area of Park Street. It is in light of this that AEW UK requests that the rear of the retail park be included within the PSA designation (consultation document ref. AAP82). This would allow the whole of the retail park to be considered as a primary shopping site and enable the retail potential of the site to be maximised.
- 9.3 Additionally, the leisure potential of the retail park is also recognised, including the existing Gala Bingo use on site. There is potential for other leisure facilities, which would complement existing and future retail businesses on the park and surrounding area. AEW UK is also interested in entering into discussions with regards to the redevelopment of Bradford Place Interchange and how part of the Jerome site could be used for its expansion.
- 9.4 Overall, in accordance with guidance in the NPPF, AEW UK requests that the land uses permitted on the Jerome Retail Park be kept as flexible as possible and that the AAP is not overly prescriptive. Such an approach will enable the retail park to develop in line with the needs of Walsall town centre and local demand, thus ensuring its ongoing viability.



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2nd May 2013

Planning Policy
Planning & Building Control
Walsall Council
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WS1 1DG



Dear Sirs

**WALSALL TOWN CENTRE AREA ACTION PLAN – ISSUES AND OPTIONS
CONSULTATION (AAPIO)**

We act on behalf of Kier Property Developments Limited in relation to a site on Walsall Waterfront, to the west of the primary shopping area in Walsall town centre.

We have recently submitted a hybrid application (13/0440/FL) on behalf of our client seeking full planning permission for a multiplex cinema at first and second floor level with retail, restaurants/cafés and drinking establishments at ground floor level along with two separate units for restaurants and cafés fronting the canal. The application also seeks outline planning permission for further leisure, retail, restaurants/cafés and drinking establishments along the waterfront edge leading towards the recently opened Premier Inn hotel by the canal basin.

This application represents a major regeneration initiative and investment of around £12m in a location with adopted UDP policy support (Policy WA12) for this form of development. The proposal seeks to bring forward what has been identified in the council's adopted UDP as the primary location for leisure based development in the town centre. The supporting material submitted with the application sets out the background to the proposals and the policy context in which they are brought forward. In our view, this clearly supports leisure based development in Walsall Waterfront as a primary objective of current UDP policy.

Further supporting information is being prepared for submission which will identify that there is capacity for only one multiplex cinema in Walsall town centre and consequently it is important the council support the most appropriate location for such a facility to maximise the benefits such a development can deliver. As you will be aware, the Walsall Waterfront area covers land north and south of the canal and in recent years, development has come forward on land to the south to provide new residential uses.

Land to the north of the canal still remains vacant and the application site being promoted by Kier Property represents the last significant development area close to the primary shopping area in the town centre that could accommodate a sizeable leisure based development.

In our view it is important that the AAP for Walsall Town Centre recognises the importance of the Waterfront area as the most appropriate location for a new multiplex cinema and associated leisure uses. What is clear from the additional work that the applicant has instructed in relation to capacity for cinema provision in the Walsall area is that there is only room for one new multiplex cinema.

Our representations on the AAP Issues & Option Report are set out below with reference to relevant questions and page numbers.

Walsall Town Centre – A Place for Business

Chapter 5 of the AAPIO addresses the town centre's current economy and the existing office market, before considering new opportunities for office development. In this context the Lambert Smith Hampton (LSH) 2007 research found that there is very little office space currently available to satisfy the needs of the modern occupier in Walsall town centre. The Report suggested that much of the office stock was predominantly outdated 1960s/70s construction, badly configured and with inadequate parking provision. Against this background it is noted that the Black Country Core Strategy (BCCS) requires 220,000 m² of additional office floorspace in Walsall town centre to 2026.

Page 40 (Figure 5.1) identifies a number of potential areas for new office development. Reference is made to the Gigaport Masterplan which was granted outline planning permission in December 2008. The area identified for the Gigaport Masterplan includes substantial areas of land to the north and west of Tesco.

We note that land being promoted by Cordwell Property Group in Walsall town centre for a multiplex cinema scheme is located immediately north west of the Tesco store and adjoining the Gigaport masterplan area. We consider that this site would provide an appropriate location for new office development as part of a focused office quarter in the northern part of the town centre around Walsall College and land south of the ring road.

Page 41 provides two options for addressing the location of major new office developments. We support Option 1 which is that the Gigaport masterplan area should remain the prime, but not the only, location for office development in Walsall town centre. This would mean that office accommodation would be concentrated in one area within the town centre. In addition to that area identified as the Gigaport, we consider that the Cordwell Property Group site could be identified as appropriate for office development and allocated for such uses in the AAP.

With regard to the specific questions raised in the AAP, we comment as follows.

In relation to Question B:Q3, and as identified above, we consider Option 1 would be the most appropriate way forward in terms of locating major new office development in the town centre.

With regard to Question B:Q5, and as highlighted above, we consider the Cordwell Property Group site in the town centre would provide a good location for major new office development within the town centre and would add to the wider attraction of the Gigaport area for a new office development leading to the provision of an office quarter.

Chapter 6 – Walsall Town Centre – A Place for Leisure

Paragraph 6.5 deals with the evening economy. This addresses the night time offer in Walsall town centre and provides two options in moving forward with the AAP.

We consider that Evening Economy Option 1 should be followed whereby the AAP identifies particular zones within the town centre in which to focus investment in the evening economy (Question L:Q15).

In response to Question L:Q17 we consider that Walsall Waterfront is an ideal location for the types of uses that would support the evening economy including a multiplex cinema, restaurants/cafés and drinking establishments.

Paragraph 6.7 addresses the canal arm, tow path and canal basin. The AAP seeks to build on the recreational value of the canal by promoting a leisure led development in and around the Waterfront. Our client supports this approach in which the 'Waterfront' area is identified as the most appropriate location for major leisure led development in the town centre. We consider the Kier Property site, which is currently being promoted, is an ideal location to accommodate such uses.

In relation to the 'Canal' options, we support Option 2 in which no specific requirements are set for development fronting the canal within the town centre. We consider the existing planning policy framework provided by the adopted Development Plan (UDP) and adopted Supplementary Planning Document (SPD) for the Waterfront area to provide an appropriate policy framework under which applications for development would be determined.

Paragraph 6.8 addresses the location of new leisure developments. The AAPIO refers to the LSH research which supports demand for cinema provision in Walsall town centre along with the potential for ten pin bowling.

We note the AAPIO recognises that the Waterfront area has been identified in the adopted UDP as the town centre's primary location for leisure development. The AAP goes on to recognise that if a cinema is secured for one location within the town centre, rather than another, it may lead to one of the sites remaining undeveloped for a longer period of time.

As highlighted above, further information will be submitted in support of Kier Property Development's application (ref: 130440/FL) which demonstrates that there is only room for one additional multiplex cinema in Walsall town centre. On this basis we consider it important the AAP identifies a clear preference for provision of a multiplex cinema and other associated leisure uses on the Waterfront site.

The AAPIO goes on to recognise this point stating *"the AAP must therefore consider the primary options for the location of a cinema operator and ultimately conclude which is most beneficial to the regeneration of the town centre"*.

For reasons referred to elsewhere in this letter, we consider the Waterfront area represents the most appropriate and beneficial location for a major leisure based development in Walsall town centre which would regenerate a rundown brownfield site.

In dealing with the various options identified under the heading "The Location of New Leisure Developments" we consider that Option 1 would be the most appropriate

although we consider the AAP should allocate the Kier Property site for a range of uses including large scale leisure based development.

Given the conclusion drawn by evidence to be presented regarding the need for additional multiplex cinema provision in Walsall town centre, we consider it important the Waterfront area is continued to be supported by a development plan priority for such a use.

If other sites come forward for large scale leisure developments, those applications would be addressed on their planning merits and would need to demonstrate they would not prejudice development coming forward on the Waterfront area. The AAP should make clear that the Waterfront is the most beneficial location for large scale leisure uses in the town centre. This would give continued recognition to the Waterfront as the most appropriate location for such a use.

With regard to the specific questions raised on page 57 of the document and Question L:Q23, we consider Option 1 would be the preferred approach subject to the proviso indicated above. This would allocate one site on Walsall Waterfront for large scale leisure based development including a multiplex cinema.

In relation to L:Q25 and as indicated above we consider the Walsall Waterfront site being promoted by Kier Property to be the best location for leisure based development, especially for the multiplex cinema.


In this context, there are a number of factors which strongly support a leisure based development in this location. First and foremost is the identification in Policy WA12 of the adopted UDP that Walsall Waterfront is the preferred and most appropriate location for leisure based development within the town centre. The application site that is currently being promoted is the last remaining significant development site which could accommodate such uses in a location proximate and well linked to the primary shopping area within the town centre. It is also in the general location of other leisure based activities including the Art Gallery as well as other shopping uses including Crown Wharf Retail Park to the north.

In our view, if the proposed cinema on the Walsall Waterfront site does not come forward, a long standing opportunity will be lost for major regeneration of the Waterfront and the realisation of the objectives of Policy WA12 in the UDP.

In relation to the various tables provided as an appendix (Appendix 1) to the draft AAPIO Document, we support identification under AAP41 (Waterfront North) of the site for a cinema and other leisure uses.

We trust the above representations will be taken into account in progressing preparation of the AAP. Should it be of assistance to meet to discuss our client's proposals further, we would be more than happy to do so.

Yours faithfully



**Jeremy Williams BA (Hons) MA MRTPI
Director**

cc Mr J Nicholson – Kier Property Developments Ltd

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Please place an X in the one box that best describes you / your role in completing this consultation:

Resident or Individual		Local Authority	
Business		Public service provider e.g. education establishment, health etc	
Developer or Investor		Public agency / organisation	
Landowner		Statutory Consultee	
Planning Agent or Consultant	x	Charity	
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation			

1. Introduction, 2. What is Walsall Town Centre? and

3. The Vision for Walsall Town Centre

The introduction sets out what the Area Action Plan is, the structure of the document and the planning context. It also explains about the Sustainability Appraisal of the plan, which you can also comment on. Chapter 2 gives an introduction to the context of Walsall town centre by looking at its location and role within the wider Borough. It also covers the key challenges which are facing the town centre. This chapter includes questions and options around the proposed boundary for the AAP for your consideration. The third chapter introduces the vision and objectives for the town centre before asking if this aligns with your aspirations for Walsall.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. TCB:Q1	Comments
TCB Q1	We agree that the town centre boundary should remain as it is. Any expansion of the town centre boundary will affect the ability to secure investment in the core of the town centre further affecting the vitality and viability of the centre. The contraction of the retail function of the town centre has affected the investment in the town centre, although developments that had been put on hold are now looking to progress. Should the town centre boundary been extended this will put these investments at risk.
AV Q1	Yes.
AV A2	Yes.

4. Walsall Town Centre – A Place for Shopping

This chapter asks you questions about the current shopping experience in Walsall and the existing retail offer. It also asks questions about the Primary Shopping Area and the locations for potential new retail development. Another key focus of this chapter is the future of Walsall Market and we ask for your view of the best location for a permanent home for the market.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. S:Q8	Comments
S:Q1	The existing town centre requires significant improvement in order to ensure it is able to capture the market share that it has lost over the past fifteen years. Threadneedle are redeveloping Old Square Shopping Centre in order to enhance the retailer offer and improve the facilities for both retailers and customers. This is being carried out in two phases. The Council should recognise that this investment must be matched by continued support to the prime retailers and investors in the town centre and that every effort made to allow this investment to be carried out and realised.
S:Q2	There should be more large format stores within the town centre and help negate competition from edge and out of centre sites.
S:Q5	No, the PSA should not be changed.
S:Q6	All development should be focussed within the centre to ensure its viability and vitality. Furthermore, as discussed under our response to S:Q8 and Q9 below the total retail allocation for comparison goods for the centre at 85,000 sqm appears ambitious and based on an out-of-date retail assessment.
S:Q8 and S:Q9	We strongly support Option 1 for the location of new retail development. Whilst we recognise that the entire town centre could deliver new opportunities, this would fragment the already fragile town centre and further reduce footfall in all locations throughout the centre. Concentrating retail development opportunities in the heart of the centre (ie. Park Street and St. Matthew's Quarter) is the only realistic option if the Council want to continue and see investment flowing into the centre and the reversal of the current trend. We consider that Option 3 is wholly unsustainable and unreasonable and would lead to further erosion and fragmentation of the town centre. This option is likely to lead to investment being drawn from the heart of the town centre to sites on the

	<p>edge of the centre that are less complex to develop. If the Council do pursue this option, it would be inevitable that investors would have to reconsider their future proposals. In terms of Option 2, we welcome the fact that the Council recognise that Park Street and St. Matthew's Quarter should be the focus for investment in the town centre and this approach should be retained. The total retail allocation for comparison goods for the centre at 85,000 sqm is ambitious and based on an out-of-date retail assessment (2009), which has growth figures that have not been achieved in the past few years. As such, we consider this figure to be unreasonable and would recommend a review of realistic requirements that are needed to assist in Walsall to achieve a higher market share in the future.</p>
S:Q10	Option 2.
S:Q12	<p>Whilst there has been a market in Walsall since 1219, in recent years there has been a gradual shift and spread in its location between the Park Street, The Bridge, Bradford Street, Digbeth and Lower Hall Lane on a series of temporary consents. The spread of the market stalls and location has impeded retail units within the town centre by restricting access and visibility of the main units fronting these streets. It is noted within the Walsall Town Centre AAP that there is a perception that the quality of the stalls provides a negative image of the town centre. The market should act as a destination and its location, ideally indoors, would provide a permanent and secure base for market stall owners. It would perpetuate the long term future of the market and enable it to operate within the town centre whilst maintaining visibility for the retail units, and also enhancing pedestrian movement through the town.</p>

5. Walsall Town Centre – A Place for Business

This chapter looks at the town centre's current economy and the existing office market, before considering new opportunities for office development and asking questions about the type and location of new office development. It also considers the current industrial premises in the centre and what should happen to these in the future.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. B:Q3	Comments
	No comment.

6. Walsall Town Centre – A Place for Leisure

This chapter looks at the current leisure, cultural and community facilities in the town Centre. It asks crucial questions about the location for a cinema and around the future of the Gala Baths. There are also some questions around maximising canalside locations in the town centre, the evening economy and the overnight accommodation offer.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. L:Q19	Comments
	No comment.

7. Walsall Town Centre – A Place for Living

This chapter looks at the current housing provision within the town centre, and education, community and health facilities. It asks questions around the future need for such uses in the town centre and their possible locations. There are also questions around enhancing the character of the centre and the quality of buildings. There are some key questions around public space and environmental infrastructure.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. LV:Q3	Comments
	No comment.

8. Transport, Movement and Accessibility

This chapter looks at all aspects of movement into and around the town centre, including pedestrian movement, cycling, public transport, taxis and car parking. There are key questions around what streets could be pedestrianised, the location of a larger transport hub in the centre and the possibility of creating 'super car parks'.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. T:Q11	Comments
	No comment.

9. Walsall Town Centre – A Place for Investment

This chapter asks questions around the approach of promoting the Big Three (St. Matthew's Quarter, Gigaport, and Waterfront) and Park Street as the key areas for development in the centre and what uses should be located in these areas. This chapter also includes the 'Key Decisions' map where we have identified the sites

where we think there are important choices to be made. These are the issues where we really want your views as we think they hold the key to the future of Walsall Town Centre.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. INV:Q4	Comments
INV: Q1	<p>The current Core Strategy has identified a need for an additional 85,000sqm of convenience retail floorspace. This retail floorspace would need to deliver a step change in the retail provision within Walsall in order for the centre's market share to increase. Associated with this new floorspace is the need to provide an attractive and welcoming town centre that is legible, safe and easy to move within. Only Option 1 out of the five options outlined is able to deliver the required floorspace and associated improvements to allow for the significant change that is required to allow Walsall's position in the retail hierarchy to be strengthened. It is clear from the evidence base and from retailer requirements the type of development required in the town centre, and the so called Big Three and Park Street have the ability to deliver the vision for the area.</p>
INV: Q17 & Q18	<p>Threadneedle acts on behalf of the owners of the Old Square Shopping Centre. The centre has been the subject of a recent permission to bring multi-nationals into the centre and will continue to seek opportunities with the potential to expand further. Feasibility work is being undertaken to assess the further potential for an increase in retail floor space as part of a second phase at the centre. As such, any proposal to allocate the site for uses other than retail would not be advantageous to the owners. It is the owner's intention that the centre remains with a prime focus on retailing and, as such, we support Option 1 as set out. We see no conflict between Option 1 and Option 2, and, as such, we also support Option 2 that would allow the expansion and redevelopment of the Old Square centre. Given that the plan is being developed for the next fifteen years, we consider that it is likely that further investment will be undertaken to the centre in order to maximise the retail opportunities within the centre and make it more attractive to national retailers seeking larger more flexible floorplates. This process has already commenced with the current proposals and will continue throughout the plan period.</p>

10. Walsall Town Centre – The Sites

This chapter is all about the sites that make up the opportunities in Walsall Town Centre. It includes a summary of where the sites have come from including an overview of the 'Call for Sites' process. It asks questions about whether we have considered all relevant sites and asks if you have any more information on the sites that we should take into consideration. The section finishes by looking at the constraints we need to consider when assessing site suitability.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. SI:Q2	Comments
SI:2 & 3	<p>AAP 60 and AAP61 both form part of the Old Square Shopping Centre. AAP60 relates to the former Tesco unit that has recently got permission for further redevelopment. The suggestion in the Issues and Options document is that the site may be suitable for office development given the recent permission. The owners of the site agree that the use of the site could be intensified and would support town centre uses on the site. Secondary retail use, food and drink or leisure use would appear to be more suitable in this location, subject to the constraints of the site.</p> <p>AAP61 forms the bulk of the shopping centre. The Issues and Options document queries how much additional retail floorspace could be created if the shopping centre was reconfigured. The owners of the Centre are continuing to evaluate the options for the regeneration of the centre following the first two phases of work that have been, and are programmed to be carried out. We are confident that once these works take place and once they have been completed, the rest of the centre can be evaluated for its future contribution to the enhancement of retail provision in this area.</p>

11. Securing and Delivering the AAP

This chapter looks at how the AAP will be delivered and what mechanism(s) we should explore to bring forwards these development opportunities. It asks you questions about delivery and phasing, and whether you know of any infrastructure requirements in the town centre.

What do you think? (please state all question numbers when answering any of the questions)

Question Number(s) e.g. D:Q3	Comments
	No comment

Any other comments...

No comment.

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3 June 2013

Dear Sir/Madam

CITY CENTRE AREA ACTION PLAN CONSULTATION

On behalf of Topland, the owners of the Sadders Centre, Jones Lang LaSalle is instructed to make representations to the above document.

Overall, we are encouraged by the broad direction of this document which re-enforces the Council's objectives for the regeneration of Walsall. However, we have several areas of concern. These include the plans to accommodate 85,000m² of additional comparison floorspace. We are of the view that the introduction of this amount of floorspace is misguided and should be the subject of a 'reality check'. In addition, no impact assessment has been undertaken to inform the process and underpin an evidence base to enable a sensible range of options to be considered.

Allied to this are the options for the Primary Shopping Area. The options put forward are not supported by an evidence base and in doing so fail to comply with national policy.

If the town centre is to address the outflow of spending from its catchment and strengthen its vitality and viability, then decisions for the town's future need to be informed by a sound and robust evidence base and not, for example, a 'broad brush' theoretical retail study undertaken in a commercial vacuum.

In summary, it is clear that there is tension between the issues of commercial viability and the Council's planning led objectives for Walsall's retail environment. With this in mind, we have reviewed the Issues and Options Report and set out our response below.

We hope that you will give substantial weight to our comments and look forward to further engagement with the Council.

SECTION 3: THE VISION FOR WALSALL TOWN CENTRE

Question AV Q2: Do you agree with the AAP objectives? If you disagree, why?

Answer: Yes, among other things, the objectives rightly identify the need to enhance and maximise Walsall's competitiveness. Within a retail context it would be useful to note that Walsall's retail position is vulnerable to a declining market share. Walsall's market share has declined from 7.6% in 2004 to 7.1% in 2009 (Joint Black Country Retail Study 2009). Given the economic impact of the recession, the growth in competition elsewhere, including the internet, it is expected that since 2009 Walsall has lost further market share and a significant amount of spending. This decline is evidenced by, among other things, the high number of vacancies. In other words, the role and sub-regional position of Walsall town centre has changed, and continues to do so.

Accordingly, the objectives need to strike a balance between pushing for ambitious growth and supporting the established core to stem the flow of investment and spending to other destinations.

Question S Q1: What do you think of the current shopping experience in the town centre? What can be done to improve the experience?

Answer: The town could be tidier. In particular, the public realm is cluttered by the market. As a result there is very little space to hold events in the town. The Bridge Area was previously designated as an event/promotion area.

Some ideas on improvements include:

- To promote the town centre events should to be linked to introduce a USP to allow Walsall to differentiate itself and compete with other towns and shopping destinations.
- There is a paucity of locational boards in town centre which welcome visitors and list what is available and on offer. Improvements to signage and the public realm on Park Street would be a significant benefit to the centre.
- Road signage in the town could also be improved at the entrances to the town centre.
- Empty shops should be smartened up. The Council have done a small amount of work on this but this could be a key policy for council and landlords. Otherwise there is the risk that visitors and shoppers perceive a sense of neglect around town.
- A local 'Shop Local' campaign to retain existing market share could benefit the centre. There is a need to advertise what the town has, for example "why spend time and effort going to Birmingham when you can get the day-to-day products in Walsall".

- Incentives to improve customer care in the town centre could be of benefit. For example, the introduction of town centre ambassadors to assist shoppers and visitors, and communicate with other town centre custodians would deliver benefits.
- Car parking tariffs should be reasonable and fair to attract shoppers. To this end the centre is likely to benefit from a car parking strategy which is developed by the Council and car park operators/owners.
- The variable messaging signs in around the town centre could be more shopper friendly and geared towards attracting shoppers. The signs currently offer speed restrictions and health and safety messages, but on the right day they could offer information on what is going on in Walsall.

Question S Q2: How much impact does the variety of shops available in Walsall have on the attractiveness of the town centre as a place for shopping?

Answer: The variety of shops that the town centre can offer is very important as there has been a loss of market share to Crown Wharf, Birmingham, Wolverhampton and other destinations. The right mix of shops will mean that the centre is better placed to attract a range of demographic groups.

The Market should be part of the solution. The market is not particularly attractive, both aesthetically and as a shopping destination which provides variety, diversity and choice.

To this end there is a need to raise the bar on the market – i.e. better layout, consistent and decent quality stalls and regular specialist offers e.g. Italian, French, German markets. Specialist markets have been introduced at Christmas and they appear to have been a success for town centre.

We are of the view that unless positive change is introduced the market will continue to deteriorate and will inevitably fail to engage with the vast majority of customers in the town.

Finally, the Lichfield/Leicester street area represents an opportunity to improve the town centre's shopping experience. It is one of the main entrances to the town and there is a lot of boarded up property in that area. Its pedestrian friendly environment and collection of attractive historic buildings offer a solid base for significant improvement to variety and choice.

Question S Q3: Should the AAP explore issues around the number of some uses in the town centre such as hot food take-away outlets or betting shops?

Answer: The number and location of hot food take-away outlets should be monitored. Once an understanding of the role of these shops in the town centre is understood then options could be explored.

The same is applicable to betting shops. It is understood that there are currently three betting shops already in town and their contribution to the town centre needs to be better understood before options can be formulated.

Question S Q4: Which of the above options do you agree with most, and why? (Primary Shopping Area Boundary)

Answer: From the available evidence base Option 3 “*reduce the current PSA boundary*” is, based on our observations, likely to be the most prudent, however without a proper evidence base no option can be sensibly understood or pursued.

The current boundary (as defined by the UDP) cannot be sensibly relied on as starting point for plan making, or indeed decision making. This is because, among other things, it fails to comply with the NPPF. Despite what is stated in the Issues and Options Report the Black Country Core Strategy does not define the PSA.

It is inappropriate that a historic PSA should be carried forward as a credible and robust option from an out-of-date development plan to the next without having been tested against current planning policy. On this basis, to suggest alternative options, such as the centre should be expanded from the current boundary, represents a failure to understand basic planning principles. Accordingly, the approach is unsound and fails to comply with the NPPF.

The NPPF and Town Centres Practice Guidance

In setting out options for the construction of a PSA it is necessary to consult and have regard to the requirements of the NPPF and the DCLG’s Town Centres Practice Guidance.

The NPPF at Section 2 ‘Ensuring the vitality of town centres’ sets out the plan-making and development assessment policies which promote the Government’s ‘town centres first’ approach. Of relevance to the construction of the PSA is Paragraph 23 which requires that local planning authorities “*define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary retail frontages...*”

The Practice Guidance provides assistance on defining the extent of the PSA. It states that “*key considerations will be...prime rental levels, and/or pedestrian flows*”. It also advises that “*the presence of key anchor stores and other main town centre uses (e.g.) cinemas may also help to identify the extent of the PSA.*”

The Practice Guidance (Paragraph 4.26) provides further information on how the Council should go about preparing a suitable evidence base to inform the extent of the PSA. It states that “*the use of regular health checks provides a means of monitoring changes over time, and provides the local planning authority with a good understanding of the resilience of its centres to change, and to gauge the significance of the impact of new developments. Regular health checks can also help to inform decisions about the extent of the primary shopping and primary/secondary frontages area, for example recognising where the role and function of different parts of the centre have changed over time.*”

We have not sighted any evidence that has been employed to formulate the options for the PSA. In particular, no up-to-date commercial, retail or footfall research has been identified to understand the possible extent of the primary and secondary frontages, and no up-to-date health check of the town centre has been undertaken to appreciate that the role and function of the centre has changed since .

Before the Council considers its options for the PSA it needs to undertake further analysis, ensure compliance with national policy and make use of the DCLG's Town Centres Practice Guidance. If an evidence base was prepared it is anticipated that the Council would find that the role and function of the centre has changed over the last decade. In particular, we would expect that the evidence will show that that the centre has contracted, and its gravity shifted.

It is remarkable that the Council would even present these important options without first undertaking the necessary baseline work to formulate a series of sensible options.

In a summary, the definition of the PSA is critical to the success of the town centre. As such the AAP needs to be founded on a robust and credible evidence base and be in accordance with national planning policy. Once the necessary evidence base is complete and the issues are properly examined the options can then be sensibly formulated and consulted on.

Question S Q5: Do you think the primary Shopping area needs to be changed? If so how?

Answer: Our response to Question 4 details our concerns with respect to the PSA. Once an robust evidence base is available it would be appropriate to provide in depth comment on how a sensible PSA should be constructed.

Question S Q7: The current PSA policy places no restriction on other town centre uses within the defined area. Do you agree with this approach or should the AAP look to control uses in the PSA further?

Answer: We are of the view that the AAP should seek to control uses on the primary and secondary retail frontages with the objective of improving the vitality and viability of the town centre.

Question S Q8: Which of the above options do you agree with most, and why? (Location of major new retail development)

Answer: Development should not be left to the vagaries of the market. Option 1 is the only option that will reinforce the established retail core and ensure the on-going vitality and viability of the town centre.

Question S Q9: Where should we deliver the 85,000m² of new comparison floorspace set as a target in the BCCS? Do you agree with the sites we have identified in Table 1 (Appendix 1) as potential retail development opportunities? What have we missed?

Answer: What has been missed in this instance is a reality-check on whether 85,000m² of new floorspace is both deliverable and beneficial for the town centre. If the redevelopment of existing floorspace to accommodate Primark and Co-op cannot come forward without £8m of Council funding it raises serious doubt as to whether there is a demand/need for additional retail floorspace.

Allied to this is the absence of an impact assessment to understand the implications of introducing significant amounts of additional floorspace to the town centre. The Practice Guidance expects that impact assessments are undertaken at the policy formulation stage (see Part 4 of the Practice Guidance).

Quantitative and Qualitative Need

While it is acknowledged that one of the problems Walsall has is that while it has a strong retail provision at its core, the size of the units available in the town centre do not often meet retailers' aspirations when compared to what is provided at Crown Wharf for example. To this end the proposal to provide modern floorspace to accommodate Primark and Co-op, which faces onto the town centre's retail core, is supported.

Jones Lang LaSalle is of the view that there is a qualitative need for floorspace that is configured to meet modern retailing requirements. Modern retailers often require larger units, with good servicing and regular trading floors. Where the quality of existing provision does not match occupier requirements, this will usually be corroborated by problems, such as high levels of vacancy and significant 'leakage' of trade to other centres.

Within this context it would be sensible for the Council to question and scrutinise quantitative forecasts for additional floorspace. It is clearly evident that there is an oversupply of floorspace in the town centre and this has been growing. According to Goad, in January 2013, there were 152 vacant units in the town centre. This represents an alarming vacancy rate of 30.3%, and a total floorspace of 33,955m². In reality it is clear that there is no substantive quantitative need for comparison floorspace. Even during the years of spending growth before the recession there was contraction of shop numbers in the town centre.

An allocation for new floorspace needs to be supported by an assessment using an up-to-date evidence base which reflects the current market circumstances and economic challenges facing Walsall.

Impact Assessment

In line with the Practice Guidance (Paragraph 4.15) it is considered essential that the local planning authority understand the implications of the additional floorspace on the vitality and viability of the centre and whether it would prejudice investment. In other words, we are of the view that Council does not know

what impact the proposed floorspace and associated allocations would have on the town centre and therefore does not currently have sufficient information to make a sound decision.

Based on our experience elsewhere Jones Lang LaSalle are of the view that the additional floorspace is likely to have a significant impact on the core of the town centre by reason of dilution and fragmentation of the existing offer. In the absence of detailed impact work demonstrating otherwise, it is considered that the options for additional retail floorspace beyond the retail core/prime pitch fails to accord with the objectives of the NPPF and risks undermining the Council's aspirations for the regeneration of the town centre.

Question S Q10: Which of the above option to you agree with (Walsall Market)?

Answer: It is agreed that a solution is needed ensure that the market appeals to shoppers and contributes to the vitality and viability of the town centre. As it stands the market not particularly attractive, both aesthetically and as a shopping destination that provides variety, diversity and choice.

To this end there is a need to raise the bar on the market and decide on its composition and long term location.

Short Term

In the short term a better layout, consistent and decent quality stalls and regular specialist offers e.g. Italian, French, German markets would be beneficial. Specialist markets have been introduced at Christmas and they appear to have been a success for town centre.

We are of the view that unless positive change is introduced the market will continue to deteriorate and will inevitably fail to engage with the vast majority of customers in the town. In addition, as it occupies a significant area of public realm on the edge of the prime pitch there is a risk that it will drag the centre down with it.

Medium to Long Term

Unless the market is significantly improved and it can be clearly demonstrated that it contributes to the vitality and viability of the town centre it needs to be relocated. In our view its continued presence in the current location detracts from the town centre and is a threat to its successful vitality and viability.

Accordingly, in the medium to long term the question about the location of the market needs to be addressed.

Saddlers did not object to the market's current position as this was deemed as a temporary move. Saddlers felt it could live with it in the short term if it led to improvements to the quality of the market.

Whilst we understand that the market may need to remain in the current position for the short term our experience to date is that it does not enhance the town centre. If it remains where it is on a medium to long term basis it would continue to blight the locality to detriment of the centre's vitality and viability.

Allied to this is the concern that retailers in the town centre are paying significant costs to operate and some are having their sight lines damaged by the market stall positioned outside their shop windows. This may lead to increased vacancies as retailer move to other locations or destinations.

Question S Q14: Do you think the AAP should make provision for a site to accommodate a factory outlet centre? If yes, where?

Answer: No. The provision of additional retail floorspace outside the retail core that sells good that are sold in the town centre is likely to have a significant adverse impact on the vitality and viability of the town centre.

SECTION 7: WALSALL TOWN CENTRE – A PLACE FOR LIVING

Question LV Q29: Which of the above options do you agree with most, and why? (Public Realm)

Answer: Option 1. The Council should enhance and maintain its existing infrastructure in order to attract investment and improve the vitality and viability of the town centre.

Question LV Q30: Which areas of the town centre need public realm improvements, and how should this be done?

Answer: Enhancements to the public realm should be focussed on areas of high footfall, 'gateways' and key linkages.

Question LV Q33: Which of the above options do you agree with, and why? (Linkages)

Answer: Option 1. Park Street is the town centre's prime pitch and this should be reflected in its environmental quality.

SECTION 8: TRANSPORT, MOVEMENT AND ACCESSIBILITY

Question T Q1: Which of the above options do you agree with most, and why? (Pedestrianisation)

Answer: Option 3. The current provision of pedestrianised streets serves the established retail core well while not hindering vehicular access to the town centre. To make significant changes that would increase or reduce pedestrianised areas would have negative implications on traffic movement and pedestrian safety.

Question T Q2: How should the AAP seek to improve pedestrian movement between the retail core, indoor shopping centres, transport interchanges and other important elements?

Answer: Improvements to the public realm would enhance environmental quality and therefore promote improved pedestrian movement around the centre.

Question T Q7: Which of the above options do you agree with most, and why? (Walsall Railway Station)

Answer: The improved capacity and modernisation of the rail infrastructure is supported. However, there is insufficient information available to understand the implications of the proposed upgrades on the town centre's shopping provision, and in particular Saddlers Shopping Centre.

Topland, the owners of Saddlers, are currently communicating with Network Rail to better understand the nature and extent of the proposal to improve line and station capacity.

Question T Q14: Which of the above options do you agree with most? (Car Parking)

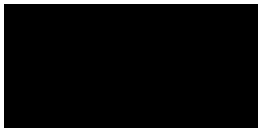
Answer: Options 2 and 4 both have merit. Both represent improvement to the existing position while not disrupting the existing highway network and patterns of travel.

Question L Q25: Where do you think the best location for such facilities, especially the cinema?

Answer: A new cinema should be an integral part of town centre and would therefore be better placed next to Premier Inn rather than by Tesco.

We trust these comments are useful. Please do not hesitate to contact me if you wish to discuss any element in further detail.

Yours faithfully



Cameron Judson
Associate Director

Enc

cc. Steve Pope, Topland Group of Companies



03 June 2013
L 130603 - Walsall Town Centre AAP Reprs.docx

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Dear Sir or Madam

**WALSALL TOWN CENTRE AREA ACTION PLAN – ‘A PLACE FOR EVERYONE’
ISSUES AND OPTIONS REPORT
REPRESENTATIONS SUBMITTED ON BEHALF OF HERCULES UNIT TRUST C/O BRITISH LAND
COMPANY PLC**

Introduction

We are instructed by our client, Hercules Unit Trust c/o British Land Company Plc (HUT), to make representations on the Walsall Town Centre Area Action Plan (AAP) Issues and Options Report.

The Hercules Unit Trust is the owner of the Crown Wharf Shopping Park on Wolverhampton Street. The Shopping Park accommodates approximately 21,500 sq. m of retail floorspace and is an established retail destination within Walsall. It is located directly adjacent to the current defined Primary Shopping Area (PSA) and benefits from direct links with the Primary Shopping Frontages.

Given the scale of the Shopping Park, the permitted retail use and the existing tenants, it is considered to be an integral part of the overall attractiveness of Walsall town centre as a retail and commercial destination. The established role and function of the Shopping Park should be properly acknowledged within the AAP.

As part of this correspondence we provide evidence to support the representations and comments on the overall objectives of the AAP and the specific policies.

Evidence to Support the Representation on the AAP

In January 2009, a Survey of 315 shoppers in Walsall town centre was undertaken by NEMS market research on behalf of the owner of the Shopping Park. The Survey sought to gain an understanding of shoppers' perception of the Shopping Park's role within the retail function of Walsall town centre.

A copy of the Survey results are included as part of these Representations at **Annex 1** although the key findings are summarised below:

- Approximately **70%** of shoppers stated Crown Wharf Shopping Park forms part of Walsall's main shopping area;
- Approximately **90%** of shoppers had visited Crown Wharf in the last 12 months;
- Approximately **90%** of shoppers who had visited in the last 12 months said they would typically link trips between the PSA and Crown Wharf; and
- Approximately **80%** of shoppers who had visited in the last 12 months consider Crown Wharf to be an important part of Walsall's shopping provision.

The empirical evidence collated in respect of shopping patterns within Walsall support our assertion that Crown Wharf Shopping Park already functions as an integral part of the town centre's retail provision and overall attraction as a retail and commercial destination. It follows that it is entirely appropriate for the Shopping Park to be included within the defined PSA.

The empirical data obtained by the owner of the site is corroborated by the findings of the Walsall Town Centre Survey (December 2010). The Town Centre Survey confirms that car park at the Crown Wharf Shopping Park is the most frequently used car park. 26% of respondents used the facility at the Shopping Park when visiting the town centre.

The Shopping Park provides the most sequentially preferable opportunity for additional retail floorspace and new, large format retail formats to meet the growing needs of Walsall and its resident population. The Shopping Park complements the traditional retail provision in the historic core and helps to support the commercial function of the centre as a whole. This role should be recognised by its inclusion within the PSA through a redefinition of its boundaries. Extending the boundaries of the PSA in this way would accord with the objectives set out in the National Planning Policy Framework (NPPF) to plan positively for growth.

Specific Comments on the AAP

We provide our comments on behalf of our client in relation to the relevant questions set out within the AAP below.

TCB: Q1 and Q2 – The Town Centre Boundary

TCB Questions 1 and 2 ask whether the Town Centre Boundary should be amended and why. As stated at Paragraph 2.4 of the AAP, the Town Centre Boundary has been defined and included within the adopted Black Country Core Strategy (BCCS) and was carried through from the Walsall Unitary Development Plan.

National policy guidance states that the town centre should be defined including the PSA, areas of predominantly leisure, business and other main town centre uses within or adjacent to the PSA. The Boundary for Walsall town centre has been defined to include the current PSA, along with the area in which retail development is currently focussed and encompasses all of the main town centre uses.

It follows that the current Town Centre Boundary should remain as currently defined.

AV: Q1 – The Vision

HUT supports the overall Vision set out by the Council, particularly in that Walsall is to be regenerated as a sub-regional centre with an attractive choice of retail facilities to meet the requirements of the catchment area. The Crown Wharf Shopping Park provides retail facilities which will help to bring Walsall forward as a Strategic Centre.

We request that the Vision is amended to state that the Strategic Centre will provide an attractive choice of both **convenience** and comparison shopping facilities, not just comparison facilities.

Although we appreciate that the Vision focuses on comparison facilities given the strategic level of the centre, it is still of paramount importance that it comprises a comprehensive range of convenience operations. This would accord with the retail offer of other, established strategic centres within the Region.

AV: Q2 and Q3 – AAP Objectives

The AAP sets out ten objectives for the future of Walsall town centre at Page 23 of the consultation document. We comment below on Objective 3 which states:

‘3. increase the choice, quality and diversity of the town centre retail offer in order to meet the needs of all sectors of the population. To secure a mix of occupiers in the town centre through the

provision of units of sufficient size and quality in suitable locations to meet the requirements of modern retailers.'

HUT supports Objective 3. The objective to enhance the retail offer and overall commercial attraction of Walsall town centre accords with national planning policy objectives and established land use planning. As set out previously, Crown Wharf Shopping Park is an integral part of the overall attraction of the town centre. Although currently located outside the PSA, the retail floorspace at the Park helps to support its role and function. The Shopping Park provides larger format premises which complements the majority of the retail accommodation within the historic core and ensures that the town centre has a comprehensive range of retail operations.

S: Q4, Q5, Q6 and Q7 – The Primary Shopping Area

Questions 4 to 7 on Page 29 of the consultation document relate to the boundary of the PSA and ask whether the boundary should be amended.

Given the quantum and nature of the retail floorspace at the Crown Wharf Shopping Park, and its role in the overall attraction of Walsall as a retail destination¹, HUT request that the PSA boundary is extended to include the Park.

The Shopping Park is situated directly adjacent to the existing defined PSA and forms part of the contiguous retail frontages within Walsall town centre. There are direct pedestrian links between the Shopping Park and the defined Primary Shopping Frontages and there is clear evidence that, in reality, the two separate destinations function as one centre.

Annex 2 of the NPPF includes a formal definition of PSA, which is:

Defined area where retail development is concentrated (generally comprising the primary and those secondary frontages which are adjoining and closely related to the primary shopping frontage).

The physical characteristics of the Shopping Park accord with the above definition which support its inclusion within the PSA.

The Shopping Park is also considered to function as part of the PSA. The Shopper Survey included as part of this correspondence and summarised above demonstrates the importance of the Shopping Park in terms of the retail function of Walsall and its relationship with the historic PSA. The survey results demonstrate that the majority of people (90%) link a trip to the Shopping Park with the historic PSA. A key indication of the role and function of the Shopping Park is that the majority of respondents (70%) already believe the Shopping Park is located within Walsall's PSA.

The Council itself refers to Crown Wharf Shopping Park as a 'key destination' of the town centre in the AAP and the Town Centre Survey (2010) confirms the car park is the most frequently used by visitors to the town centre.

In light of the above, we request that the boundary of the PSA is extended to include the Crown Wharf Shopping Park.

S: Q8 and Q9 – The Location of Major New Retail Development

Questions 8 and 9 on Page 32 of the consultation document relate to the location of major new retail development within the town centre.

¹ See the empirical evidence gathered as part of the survey of shoppers in Walsall Town Centre in January 2009 (Enclosed).

We recognise that the redevelopment of Park Street and St Matthew's Quarter are important regeneration objectives for Walsall town centre. The AAP however should not limit the scope for major development to two distinct areas. One of the key objectives of the NPPF is to promote flexibility in plan making and decision taking to assist its overarching aim which is to achieve sustainable economic development.

Commercial sectors constantly evolve with new formats and requirements emerging frequently in both the retail and leisure industry. The AAP needs to be as flexible as possible to ensure the Council can react to emerging opportunities now and over the plan period to accommodate appropriate development within the town centre.

In light of the above, HUT supports Option 3, in that the location of major retail development should be uncontrolled within the AAP.

We would also suggest that the term 'major retail development' is defined within the AAP using appropriate terminology (e.g. floorspace) to ensure the document is clear and precise.

T: Q1 and Q2 – Pedestrianisation and INV15: Sites for Key Decisions

The Council sets out three Options relating to the pedestrian areas within the town centre at Page 82. Option 1 suggests the area between Crown Wharf and Park Street is pedestrianised to encourage movement between the town centre and the Shopping Park. The same area is identified on the map setting out 'Sites for Key Decisions' (Ref: INV15) in respect of improving links between the two main retail locations.

HUT acknowledge that improving pedestrian links between the Shopping Park and Park Street would be beneficial in terms of creating a more cohesive commercial centre. As part of a recent planning permission² at the site, financial contributions were made by HUT to the Council to help improve the pedestrian crossing on Townend Street and enhance linkages. Further improvement works of this nature are supported.

The key consideration in respect of full pedestrianisation of this part of the local highway network would be the impact on the accessibility of sites along Wolverhampton Street and the flow of traffic around the town centre. Ensuring that facilities remain accessible to customers is of paramount importance to the viability of the town centre and therefore the detailed design of any scheme of highway works would need to be carefully assessed before they can be supported.

HUT supports the strategic objective to enhance links between the Shopping Park and Park Street as this would help to improve the cohesion of the key retail areas and the Town Centre as a whole.

Summary and Conclusion

The Crown Wharf Shopping Park is an integral part of the retail function of Walsall town centre. Its physical and functional characteristics accord with the definition of a PSA contained within the NPPF and the empirical data³ detailing customer perceptions and actions also support its allocation as part of the PSA.

The extension of the PSA to include the Shopping Park would also accord with the national planning policy requirements for local planning authorities to plan positively for growth, secure economic development and job creation and create sustainable forms of development.

Below we summarise the key points made in these representations:

- The Town Centre Boundary has been correctly defined in accordance with national policy and should remain as is;

² Permission Ref: 11/1584/FL

³ NEMS Survey, 2009 and Town Centre Survey, 2010.

- The Vision for Walsall should be amended to include reference to both convenience and comparison shopping facilities;
- The boundary of the PSA should be extended to include the Crown Wharf Shopping Park; and
- The Shopping Park is already well connected to the existing PSA although enhancing pedestrian links would further strengthen these and create a more cohesive centre.

We trust that these representations will be considered as part of the Council's ongoing process to develop the AAP. We would be grateful if you can keep us informed of its progress and any additional stages of consultation that are undertaken as part of the evolution of the document towards final adoption.

In the meantime, should you have any questions please do not hesitate to contact either Tim Price or Heather Lindley at these offices.

Yours faithfully

A large black rectangular redaction box covering the signature area.

Savills (UK) Limited
Retail Planning

cc. M Reed – British Land

Enc.



Annex 1

Town Centre Survey undertaken by NEMS

Walsall Town Centre Survey for Savills

	Total	Male	Female	18 - 34	35 - 54	55 +	ABC1	C2DE	At the north end of Park Street (to the north of the junction with Station Street)	At the south end of Park Street or St Pauls Street (near the bus station)										
Q01 In your opinion, Do you consider Crown Wharf part of Walsall's main shopping area?																				
Yes	68.3%	215	65.8%	73	69.6%	142	77.7%	94	68.9%	73	54.5%	48	67.3%	76	68.5%	135	64.7%	101	71.7%	114
No	28.9%	91	32.4%	36	27.0%	55	17.4%	21	30.2%	32	43.2%	38	31.9%	36	27.4%	54	32.7%	51	25.2%	40
(Don't know)	2.9%	9	1.8%	2	3.4%	7	5.0%	6	0.9%	1	2.3%	2	0.9%	1	4.1%	8	2.6%	4	3.1%	5
Base:		315		111		204		121		106		88		113		197		156		159
Q02 Have you visited Crown Wharf in the last twelve months?																				
Yes	88.3%	278	84.7%	94	90.2%	184	94.2%	114	85.8%	91	83.0%	73	92.9%	105	85.3%	168	94.2%	147	82.4%	131
No	11.7%	37	15.3%	17	9.8%	20	5.8%	7	14.2%	15	17.0%	15	7.1%	8	14.7%	29	5.8%	9	17.6%	28
Base:		315		111		204		121		106		88		113		197		156		159
Q03 As part of a trip to Crown Wharf, would you typically visit other shops and services in Walsall (e.g. businesses on Park Street/Bridge St/St Pauls Street)? <i>Those who have visited Crown Wharf in the last twelve months at Q02</i>																				
Yes	88.5%	246	92.6%	87	86.4%	159	90.4%	103	86.8%	79	87.7%	64	85.7%	90	90.5%	152	83.7%	123	93.9%	123
No	11.5%	32	7.4%	7	13.6%	25	9.6%	11	13.2%	12	12.3%	9	14.3%	15	9.5%	16	16.3%	24	6.1%	8
Base:		278		94		184		114		91		73		105		168		147		131
Q04 Do you consider Crown Wharf to be an important part of Walsall's shopping provision? <i>Those who have visited Crown Wharf in the last twelve months at Q02</i>																				
Yes	82.4%	229	81.9%	77	82.6%	152	88.6%	101	83.5%	76	71.2%	52	87.6%	92	79.2%	133	76.2%	112	89.3%	117
No	13.7%	38	13.8%	13	13.6%	25	8.8%	10	12.1%	11	23.3%	17	11.4%	12	14.9%	25	17.0%	25	9.9%	13
(Don't know)	4.0%	11	4.3%	4	3.8%	7	2.6%	3	4.4%	4	5.5%	4	1.0%	1	6.0%	10	6.8%	10	0.8%	1
Base:		278		94		184		114		91		73		105		168		147		131
GEN Gender:																				
Male	35.2%	111	100.0%	111	0.0%	0	30.6%	37	40.6%	43	35.2%	31	33.6%	38	36.5%	72	33.3%	52	37.1%	59
Female	64.8%	204	0.0%	0	100.0%	204	69.4%	84	59.4%	63	64.8%	57	66.4%	75	63.5%	125	66.7%	104	62.9%	100
Base:		315		111		204		121		106		88		113		197		156		159

Walsall Town Centre Survey for Savills

	Total	Male		Female		18 - 34		35 - 54		55 +		ABC1		C2DE		At the north end of Park Street (to the north of the junction with Station Street)		At the south end of Park Street or St Pauls Street (near the bus station)		
AGE Age Group:																				
18 - 24 years	22.5%	71	19.8%	22	24.0%	49	58.7%	71	0.0%	0	0.0%	0	21.2%	24	22.8%	45	15.4%	24	29.6%	47
25 - 34 years	15.9%	50	13.5%	15	17.2%	35	41.3%	50	0.0%	0	0.0%	0	15.0%	17	16.2%	32	16.7%	26	15.1%	24
35 - 44 years	14.9%	47	15.3%	17	14.7%	30	0.0%	0	44.3%	47	0.0%	0	23.9%	27	9.6%	19	16.7%	26	13.2%	21
45 - 54 years	18.7%	59	23.4%	26	16.2%	33	0.0%	0	55.7%	59	0.0%	0	17.7%	20	19.8%	39	21.2%	33	16.4%	26
55 - 64 years	14.6%	46	16.2%	18	13.7%	28	0.0%	0	0.0%	0	52.3%	46	14.2%	16	14.7%	29	14.1%	22	15.1%	24
65+ years	13.3%	42	11.7%	13	14.2%	29	0.0%	0	0.0%	0	47.7%	42	8.0%	9	16.8%	33	16.0%	25	10.7%	17
Base:		315		111		204		121		106		88		113		197		156		159
SEG Occupation of Chief Wage Earner:																				
AB	10.8%	34	9.0%	10	11.8%	24	5.8%	7	15.1%	16	12.5%	11	30.1%	34	0.0%	0	16.0%	25	5.7%	9
C1	25.1%	79	25.2%	28	25.0%	51	28.1%	34	29.2%	31	15.9%	14	69.9%	79	0.0%	0	25.0%	39	25.2%	40
C2	17.5%	55	23.4%	26	14.2%	29	12.4%	15	24.5%	26	15.9%	14	0.0%	0	27.9%	55	18.6%	29	16.4%	26
DE	45.1%	142	41.4%	46	47.1%	96	51.2%	62	30.2%	32	54.5%	48	0.0%	0	72.1%	142	38.5%	60	51.6%	82
(Refused)	1.6%	5	0.9%	1	2.0%	4	2.5%	3	0.9%	1	1.1%	1	0.0%	0	0.0%	0	1.9%	3	1.3%	2
Base:		315		111		204		121		106		88		113		197		156		159
LOC Location:																				
At the north end of Park Street (to the north of the junction with Station Street)	49.5%	156	46.8%	52	51.0%	104	41.3%	50	55.7%	59	53.4%	47	56.6%	64	45.2%	89	100.0%	156	0.0%	0
At the south end of Park Street or St Pauls Street (near the bus station)	50.5%	159	53.2%	59	49.0%	100	58.7%	71	44.3%	47	46.6%	41	43.4%	49	54.8%	108	0.0%	0	100.0%	159
Base:		315		111		204		121		106		88		113		197		156		159

Walsall Town Centre Survey for Savills

PC	Postcode Sector	Total	Male	Female	18 - 34	35 - 54	55 +	ABC1	C2DE	At the north end of Park Street (to the north of the junction with Station Street)	At the south end of Park Street or St Pauls Street (near the bus station)						
B1	2	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0	0.6%	1	0.0%	0
B16	9	0.3%	1	0.9%	1	0.0%	0	0.8%	1	0.0%	0	0.0%	0	0.5%	1	0.0%	0
B26	1	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.0%	0	0.6%	1
B36	0	0.3%	1	0.9%	1	0.0%	0	0.8%	1	0.0%	0	0.0%	0	0.5%	1	0.6%	1
B42	1	0.6%	2	0.0%	0	1.0%	2	0.0%	0	2.3%	2	0.0%	0	1.0%	2	0.6%	1
B42	2	0.6%	2	0.9%	1	0.5%	1	0.0%	0	0.0%	0	2.3%	2	0.0%	0	1.0%	2
B43	6	0.3%	1	0.0%	0	0.5%	1	0.8%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0
B43	7	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0	0.9%	1	0.0%	0
B44	8	0.6%	2	0.9%	1	0.5%	1	0.8%	1	0.9%	1	0.0%	0	0.9%	1	0.5%	1
B44	9	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1
B62	9	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.5%	1	0.6%	1
B71	2	0.6%	2	0.9%	1	0.5%	1	0.8%	1	0.9%	1	0.0%	0	0.9%	1	1.3%	2
B71	3	0.6%	2	0.9%	1	0.5%	1	0.8%	1	0.9%	1	0.0%	0	0.9%	1	1.3%	2
B71	4	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0	0.0%	0	0.6%	1
B74	3	0.3%	1	0.9%	1	0.0%	0	0.8%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0
B74	4	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1
B75	7	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0	0.5%	1	0.0%	0
B76	6	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1
B91	1	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1
Blank		7.0%	22	8.1%	9	6.4%	13	5.0%	6	7.5%	8	7.1%	8	6.1%	12	3.8%	6
DY1	4	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.6%	1	0.0%	0
DY4	0	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1
DY4	7	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0	0.9%	1	0.0%	0
ST16	3	0.6%	2	0.9%	1	0.5%	1	0.0%	0	1.9%	2	0.0%	0	0.9%	1	0.5%	1
ST19	5	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.9%	1	0.0%	0
ST19	9	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.9%	1	0.0%	0
ST20	0	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0	1.1%	1	0.9%	1	0.0%	0
SY3	9	0.3%	1	0.9%	1	0.0%	0	0.8%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0
TF10	7	0.3%	1	0.9%	1	0.0%	0	0.8%	1	0.0%	0	0.0%	0	0.5%	1	0.0%	0
WS1	1	1.6%	5	3.6%	4	0.5%	1	2.5%	3	1.9%	2	0.0%	0	1.8%	2	1.5%	3
WS1	2	3.5%	11	2.7%	3	3.9%	8	2.5%	3	3.8%	4	4.5%	4	6.2%	7	1.5%	3
WS1	3	2.2%	7	2.7%	3	2.0%	4	2.5%	3	1.9%	2	2.3%	2	2.7%	3	2.0%	4
WS1	4	2.2%	7	2.7%	3	2.0%	4	3.3%	4	1.9%	2	1.1%	1	3.5%	4	1.5%	3
WS10	0	1.3%	4	0.9%	1	1.5%	3	0.0%	0	0.9%	1	3.4%	3	2.7%	3	0.5%	1
WS10	1	0.3%	1	0.0%	0	0.5%	1	0.8%	1	0.0%	0	0.0%	0	0.5%	1	0.0%	0
WS10	8	3.2%	10	3.6%	4	2.9%	6	5.0%	6	1.9%	2	2.3%	2	3.5%	4	3.0%	6
WS10	9	3.8%	12	1.8%	2	4.9%	10	4.1%	5	3.8%	4	3.4%	3	2.7%	3	4.6%	9
WS11	0	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0	1.1%	1	0.9%	1	0.0%	0
WS11	5	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.5%	1	0.6%	1
WS11	9	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.9%	1	0.0%	0
WS12	1	0.3%	1	0.0%	0	0.5%	1	0.8%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0
WS12	4	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1

Walsall Town Centre Survey for Savills

	Total	Male	Female	18 - 34	35 - 54	55 +	ABC1	C2DE	At the north end of Park Street (to the north of the junction with Station Street)	At the south end of Park Street or St Pauls Street (near the bus station)										
WS13 6	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1	0.0%	0	0.6%	1
WS15 1	0.3%	1	0.0%	0	0.5%	1	0.8%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0	0.0%	0	0.6%	1
WS15 2	0.6%	2	0.9%	1	0.5%	1	0.0%	0	1.9%	2	0.0%	0	0.0%	0	1.0%	2	0.0%	0	1.3%	2
WS2	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0	0.9%	1	0.0%	0	0.0%	0	0.6%	1
WS2 0	3.8%	12	0.9%	1	5.4%	11	5.8%	7	3.8%	4	1.1%	1	2.7%	3	4.6%	9	2.6%	4	5.0%	8
WS2 3	0.3%	1	0.9%	1	0.0%	0	0.8%	1	0.0%	0	0.0%	0	0.0%	0	0.5%	1	0.0%	0	0.6%	1
WS2 7	2.2%	7	0.9%	1	2.9%	6	3.3%	4	2.8%	3	0.0%	0	0.0%	0	3.6%	7	2.6%	4	1.9%	3
WS2 8	5.4%	17	3.6%	4	6.4%	13	5.0%	6	7.5%	8	3.4%	3	4.4%	5	6.1%	12	7.1%	11	3.8%	6
WS2 9	4.8%	15	5.4%	6	4.4%	9	8.3%	10	1.9%	2	3.4%	3	3.5%	4	5.1%	10	6.4%	10	3.1%	5
WS3 1	3.8%	12	3.6%	4	3.9%	8	3.3%	4	3.8%	4	4.5%	4	0.9%	1	5.6%	11	3.8%	6	3.8%	6
WS3 2	4.1%	13	3.6%	4	4.4%	9	5.8%	7	1.9%	2	4.5%	4	0.9%	1	6.1%	12	3.8%	6	4.4%	7
WS3 3	4.1%	13	4.5%	5	3.9%	8	4.1%	5	3.8%	4	4.5%	4	6.2%	7	3.0%	6	3.8%	6	4.4%	7
WS3 4	3.2%	10	2.7%	3	3.4%	7	3.3%	4	1.9%	2	4.5%	4	3.5%	4	3.0%	6	2.6%	4	3.8%	6
WS3 5	0.3%	1	0.0%	0	0.5%	1	0.8%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0	0.6%	1	0.0%	0
WS3 8	0.6%	2	0.9%	1	0.5%	1	0.8%	1	0.0%	0	1.1%	1	0.0%	0	1.0%	2	0.6%	1	0.6%	1
WS4	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1	0.6%	1	0.0%	0
WS4 1	1.9%	6	0.9%	1	2.5%	5	4.1%	5	0.9%	1	0.0%	0	3.5%	4	1.0%	2	2.6%	4	1.3%	2
WS4 2	0.6%	2	0.0%	0	1.0%	2	0.0%	0	0.9%	1	1.1%	1	0.9%	1	0.5%	1	1.3%	2	0.0%	0
WS5 3	1.0%	3	0.9%	1	1.0%	2	0.8%	1	1.9%	2	0.0%	0	2.7%	3	0.0%	0	1.3%	2	0.6%	1
WS5 4	1.0%	3	0.9%	1	1.0%	2	2.5%	3	0.0%	0	0.0%	0	0.9%	1	1.0%	2	1.3%	2	0.6%	1
WS5 6	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.0%	0	0.5%	1	0.6%	1	0.0%	0
WS6 4	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.0%	0	0.5%	1	0.6%	1	0.0%	0
WS6 6	1.3%	4	1.8%	2	1.0%	2	0.8%	1	0.9%	1	2.3%	2	0.0%	0	2.0%	4	1.9%	3	0.6%	1
WS6 7	0.6%	2	0.0%	0	1.0%	2	0.8%	1	0.9%	1	0.0%	0	0.9%	1	0.5%	1	0.6%	1	0.6%	1
WS7 4	0.3%	1	0.9%	1	0.0%	0	0.8%	1	0.0%	0	0.0%	0	0.0%	0	0.5%	1	0.6%	1	0.0%	0
WS7 7	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.9%	1	0.0%	0	0.6%	1	0.0%	0
WS7 8	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1	0.6%	1	0.0%	0
WS8 6	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.0%	0	1.1%	1	0.9%	1	0.0%	0	0.0%	0	0.6%	1
WS8 7	1.3%	4	1.8%	2	1.0%	2	0.8%	1	1.9%	2	1.1%	1	1.8%	2	1.0%	2	2.6%	4	0.0%	0
WS9 0	0.6%	2	0.0%	0	1.0%	2	0.8%	1	0.9%	1	0.0%	0	0.9%	1	0.5%	1	0.6%	1	0.6%	1
WS9 8	1.6%	5	1.8%	2	1.5%	3	0.0%	0	1.9%	2	3.4%	3	2.7%	3	1.0%	2	3.2%	5	0.0%	0
WS9 9	1.6%	5	0.9%	1	2.0%	4	1.7%	2	0.9%	1	2.3%	2	0.9%	1	2.0%	4	1.9%	3	1.3%	2
WV1 2	0.6%	2	0.0%	0	1.0%	2	0.8%	1	0.9%	1	0.0%	0	0.9%	1	0.5%	1	0.0%	0	1.3%	2
WV1 8	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1	0.0%	0	0.6%	1
WV1 9	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0	1.1%	1	0.9%	1	0.0%	0	0.0%	0	0.6%	1
WV10 0	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0	0.0%	0	0.5%	1	0.0%	0	0.6%	1
WV10 9	1.0%	3	0.9%	1	1.0%	2	0.0%	0	0.0%	0	3.4%	3	0.0%	0	1.5%	3	0.0%	0	1.9%	3
WV11 2	0.6%	2	0.9%	1	0.5%	1	0.0%	0	0.9%	1	1.1%	1	0.0%	0	1.0%	2	1.3%	2	0.0%	0
WV11 3	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.0%	0	0.5%	1	0.6%	1	0.0%	0
WV12 1	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1	0.6%	1	0.0%	0
WV12 4	2.5%	8	1.8%	2	2.9%	6	2.5%	3	1.9%	2	3.4%	3	4.4%	5	1.5%	3	2.6%	4	2.5%	4
WV12 5	2.2%	7	2.7%	3	2.0%	4	2.5%	3	0.9%	1	3.4%	3	0.0%	0	3.6%	7	3.2%	5	1.3%	2
WV13 1	1.3%	4	2.7%	3	0.5%	1	0.0%	0	2.8%	3	1.1%	1	0.9%	1	1.5%	3	1.9%	3	0.6%	1
WV13 2	0.6%	2	0.0%	0	1.0%	2	0.8%	1	0.9%	1	0.0%	0	0.9%	1	0.5%	1	1.3%	2	0.0%	0

Walsall Town Centre Survey for Savills

	Total	Male		Female		18 - 34		35 - 54		55 +		ABC1		C2DE		At the north end of Park Street (to the north of the junction with Station Street)		At the south end of Park Street or St Pauls Street (near the bus station)		
WV13 3	1.6%	5	2.7%	3	1.0%	2	1.7%	2	2.8%	3	0.0%	0	0.9%	1	2.0%	4	0.6%	1	2.5%	4
WV14 7	0.3%	1	0.0%	0	0.5%	1	0.0%	0	0.9%	1	0.0%	0	0.0%	0	0.5%	1	0.0%	0	0.6%	1
WV14 8	1.0%	3	0.9%	1	1.0%	2	1.7%	2	0.9%	1	0.0%	0	2.7%	3	0.0%	0	0.6%	1	1.3%	2
WV2 1	0.3%	1	0.9%	1	0.0%	0	0.0%	0	0.0%	0	1.1%	1	0.0%	0	0.5%	1	0.0%	0	0.6%	1
WV3 1	0.6%	2	0.9%	1	0.5%	1	0.0%	0	0.9%	1	1.1%	1	0.0%	0	1.0%	2	0.0%	0	1.3%	2
WV7 3	0.3%	1	0.0%	0	0.5%	1	0.8%	1	0.0%	0	0.0%	0	0.9%	1	0.0%	0	0.0%	0	0.6%	1
Base:		315		111		204		121		106		88		113		197		156		159

I did attend the meeting in the council house and I am sorry to say that the part of the Stafford St. between court way and townend is an eye sore and is not included in any future improvement plan. It was stated in the meeting that only a few years ago some grant was given for improvement.

This part of Stafford St. is gateway to the Walsall town centre from this end and is surrounded by Millions of pounds recent investment. Tesco, Walsall College, Town Wharf, The premium Inn, The Art Gallery, The Leather Museum, are prestigious buildings. If a tourist is visiting some of these places, one has to walk through this dirty and shabby and half empty shops of Stafford St.

I strongly suggest that this part of Stafford St. must be included in any future redevelopment. Only God knows if and when Gigaport development will materialise which may effect this street.

03 June 2013

Delivered by email and postPlanning Policy Team
Planning and Building Control
Walsall Council
Darwall Street
Walsall
WS1 1DGT: 0121 233 0902
F: 0121 233 0968www.turleyassociates.co.ukOur reference:
LONQ1002/KH

Your reference:

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khartley@turleyassociates.co.uk

Dear Sir/Madam

WALSALL TOWN CENTRE AREA ACTION PLAN, ISSUES AND OPTIONS REPORT

We write on behalf of our client, London & Cambridge Properties (LCP), in response to the consultation you are currently undertaking in respect of the Town Centre Area Action Plan.

LCP own and manage the Park Place Shopping Centre and therefore have a close interest in the future development of the town centre. The Park Place Shopping Centre provides a number of retail units of varying sizes and although some of the units are currently vacant, from a commercial perspective the Centre continues to provide a viable retail location. We recognise that the Park Place Shopping Centre faces some challenges which LCP will continue to address by making appropriate investments to respond to existing and potential occupier's needs. We do not consider that the availability of larger units acts as a constraint to attracting retailers to the town centre as there is a range of units available and internal alterations can be easily made to respond to market demands.

LCP's specific comments on the issues and options raised in the consultation document are set out below.

Primary Shopping Area (PSA)

We have previously highlighted our concerns regarding the level of additional comparison retail floorspace the Black Country Core Strategy and the AAP are seeking to provide in Walsall Town Centre. The retail sector has undergone significant change and consolidation, and continues to do so, with key retailers disappearing or downsizing and far fewer seeking dual representation in many centres. LCP consider that providing 85,000 square metres gross additional retail floorspace in the town centre is over-ambitious and could actually be harmful to the existing retail core as it could lead to the redistribution of existing retailer representation within the town. In LCP's view Walsall should concentrate on regenerating the existing Primary Shopping Area and consolidating the town centre's offer and not aim for expansion. A much more measured approach is required to the provision of new floorspace. LCP therefore support PSA Option 1 which seeks to retain the current PSA boundary.

It will be important that the AAP provides flexible policies to enable the town centre to respond to market requirements. LCP therefore consider that no restriction should be placed on the type of town centre uses that are allowed to locate within the Primary Shopping Area.

Major retail provision

As outlined above, LCP consider that the AAP should focus on the existing Primary Shopping Area and therefore support Location of New Retail Option 1. We remain concerned, however, that the provision of substantial new retail floorspace has the potential to adversely affect existing retail locations and therefore suggest that the AAP should focus on redeveloping and consolidating, not expanding, retail provision in the town centre.

Walsall Market

LCP agree that the market should be located permanently on The Bridge and in Bradford Street and that this should be accompanied by significant investment in the public realm.

Factory Outlet Centres

LCP consider that there is no need for a factory outlet centre in Walsall Town Centre as there is sufficient scope in the town centre for traditional retailers to sell branded goods at discounted prices.

A Place for Leisure

LCP generally support the strengthening of the evening economy. However, it will be important to ensure that the policies of the AAP do not lead to replacement development and the redistribution of evening economy uses from one part of the town centre to another.

Public realm

LCP welcomes the AAP's aim of improving the public realm in Walsall Town Centre and consider that Public Realm Option 1 is most likely to ensure that public realm improvements are delivered. Allocating specific sites for public realm improvement (Option 2) could act as a constraint to the delivery of schemes on unallocated sites, whilst Option 3 is too noncommittal on this important issue.

LCP also supports Linkages Option 1 as this option appears to be a relatively inexpensive way of improving the physical appearance of the town centre. Linkages Option 2 appears to be a 'do nothing' option and is therefore not acceptable to LCP.

Should the proposed public transport improvements go ahead, it would make some sense from LCP's perspective to demolish the Poundland building as this would enable significant public realm improvements to be made and the linkages between the town centre, the art gallery area and Crown Wharf to be improved.

The AAP also raises the question whether there are other ways in which linkages can be improved between Park Street and the rest of the town centre. LCP are firmly of the view, and have raised this previously, that pedestrian connections between Tesco and the town centre need to be improved and LCP therefore considers that the AAP should encourage the provision of a pedestrian link from the rear of Tesco across St. Paul's Street to Park Street.

Transport, Movement and Accessibility

LCP recognise that Walsall needs to provide an efficient and accessible public transport offer, but consider that significant changes to the location and routing of public transport services could be hugely expensive without delivering a significant increase in public transport usage.

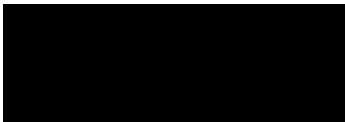
The provision of sufficient and convenient car parks is an important issue to all retailers in the town centre and particularly so as out-of-centre retail parks benefit from ample car parking. LCP therefore supports proposals to improve car parking provision in the town centre.

A Place for Investment – Park Street

LCP support Park Street Option 1 which provides greater flexibility and scope to attract retailers to the town centre than Option 2. As set out above, LCP have no plans to redevelop the Park Place Shopping Centre over the plan period. Through appropriate investment and re-configuration of units in the Park Place Shopping Centre, LCP will continue to respond to existing and potential occupier's needs.

If you would like to discuss LCP's comments on this document further please do not hesitate to contact Karin Hartley or David Smith.

Yours sincerely



Turley Associates

Other Duty to Cooperate

BIRMINGHAM & BLACK COUNTRY LOCAL NATURE PARTNERSHIP

Response under the Duty to Co-operate (Sect. 110 the Localism Act 2011)

Walsall Town Centre Area Action Plan Issues and Options

3rd June 2013

Our Vision:

“To achieve a vibrant, healthy and prosperous Birmingham and Black Country, with a restored and improved natural environment that is valued and managed as a sustainable and integrated system for the benefit and well-being of nature, people and the economy.”

Purpose of the Birmingham & Black Country LNP:

The Birmingham and Black Country Local Nature Partnership (B&BC LNP) will be a driver for positive change by valuing, championing and safeguarding a healthy natural environment. Working at a strategic level the LNP will influence decision making to ensure, integrated, long-term sustainable and resilient benefits, adaptation to climate change, ecosystem services and environmental gains for nature, people and the economy.

The LNP will provide the forum to work closely with Local Authorities, Local Enterprise Partnerships and Health and Wellbeing Boards to support the delivery of the Birmingham & Black Country Nature Improvement Area (B&BC NIA) aspirations, contributing locally to the Government’s national environmental objectives.

Thank you for giving the Birmingham & Black Country Local Nature Partnership the opportunity to comment on the Walsall Town Centre Area Action Plan Issues and Options document. The B&BC LNP hopes the comments are found to be helpful and looks forward to further opportunities to input to Walsall’s strategic planning and other matters.

1. Walsall’s environmental network is capable of making an important contribution to “a vibrant, safe, attractive and accessible environment that combines local heritage with modern design” within the boundary of the Town Centre AAP. The B&BC LNP urges that the Vision and Objectives be amended to reflect this.
2. The promotion of sustainable development and the taking of opportunities to deliver an improved environmental network, particularly through green infrastructure and the services and benefits that it brings, is important within the Town Centre boundary. Walsall’s environmental network does not stop at the Town Centre boundary. It is important to identify the environmental network within the Town Centre, identifying links to the network beyond.
3. The Town Centre provides an opportunity to demonstrate visibly the best of sustainable development in terms of the highest standards for sustainability, environmental performance, access and amenity, green infrastructure, and including ecosystem services and multiple benefits.

4. Delivery of the environmental network component of the Town Centre requires focus, and investment and development. Regeneration and development should bring opportunities in this respect but it will also require the Council and its partners to champion this focus. See also the LNP response to the Walsall SAD for examples of relevant initiatives that can assist.
5. It is important that the Town Centre AAP conforms and is aligned to national strategic planning policy such as the National Planning Policy Framework (NPPF) and national environment policy as expressed in the Natural Environment White Paper (2011). It is also important that the Town Centre AAP aligns and conforms to planning policy for the Black Country (Black Country Core Strategy), and demonstrably addresses Black Country Environment Infrastructure Guidance.

John Box
Chair, Birmingham & Black Country Local Nature Partnership

Chris Parry
Co-ordinator, Birmingham & Black Country Local Nature Partnership

Other Public Bodies



Planning Policy Team
 Planning and Building Control
 Walsall Council
 The Civic Centre
 Darwall Street
 Walsall, WS1 1TP

Our Ref.: HD/WalsallAAP/Options
Your Ref.: -
Phone: (0121) 214 7408
Email: EconomicDevelopment@centro.org.uk
Date: 3rd June 2013

Dear Sir/Madam,

WALSALL TOWN CENTRE AREA ACTION PLAN – ISSUES AND OPTIONS CONSULTATION

Thank you for the opportunity to comment on the Walsall Town Centre Area Action Plan (AAP) Issues and Options Consultation document.

The Walsall Town Centre AAP has a vital role to play in promoting public transport; as part of an overall strategy to deliver ‘a place for shopping, business, leisure, living and investment with good transport and accessibility’.

Generally, Centro considers that it is vital that all AAP’s for the West Midlands Metropolitan area:

- Identify appropriate locations for land-uses that maximise opportunities for use of public transport (for example, locating medium/high density housing and employment uses in route corridors and existing centres that are well-served by public transport);
- Protect future routes and site specific locations for future public transport schemes (including park and ride sites where appropriate);
- Identify appropriate parking standards for different types of location to maximise the potential for use of sustainable travel modes focused upon public transport;
- Give clear policies on location of development; parking standards; public transport access to new development; green transport plans; developer contributions for public transport and commuted sums for public transport;
- Set clear principles for the economic and sustainable growth of the West Midlands in line with regional Transport Policies;

Centro has recently revised its Integrated Transport Prospectus in light of the need to help boost the economy with transport, the High Speed Rail HS2 government announcement, and new Local Enterprise Partnerships and their transport priorities. The updated prospectus covers the whole transport system with a long term vision of a 4 tier integrated public transport system, smart routes smoothing traffic on the main highway network, effective motorway connections for the West Midlands including motorway junction improvements and better conditions for walking and cycling. It sets out Centro’s long term vision and the overall strategy to achieve it and it is vital that all planning policy documents embrace the objectives of the Prospectus in order for this vision to be realised.

In general, Centro welcomes and supports the emerging vision and objectives of the Walsall Town Centre AAP and would like to emphasise that it is important that there is a strong correlation between this document, the Black Country Core Strategy, the Local Transport Plan, Centro’s own strategy documents including the Integrated Public Transport Prospectus, as well as relevant regional and national planning policy documents.

It is understood that by 2026 the Walsall AAP aims to:

- Deliver 85,000 square metres of additional comparison retail floorspace
- Deliver 220,000 square metres of additional office floorspace
- Create 450 new homes
- Identify the infrastructure needs of the area, such as transport, community facilities and the public realm
- Strengthen and attract further investment to Walsall Town Centre

All these aims will have significant implications for transport and in particular public transport. In order to effectively deliver the vision and we would wish to ensure that anticipated growth in land uses outlined in the AAP vision can be supported by public transport and improved accessibility by modes such as walking and cycling.

To that end, all new development in the AAP area should ensure that the public transport network can be easily accessed and where appropriate, planning conditions/agreements should be used to ensure that new development supports walking, cycling and public transport access. In certain cases, it may also be appropriate to require that developer contributions are made towards the long-term development of the public transport network. Centro should be consulted further on significant proposals for new development in Walsall Town Centre and would welcome continued joint working with Walsall MBC. It is vital that Walsall MBC continue to involve Centro in all relevant discussions and further development of the AAP as future proposals are likely to be of significance for current and future public transportation services and infrastructure serving the AAP area and its surrounds.

Centro have provided a series of more detailed comments associated with the themes and questions set out in the Walsall Town Centre AAP Issues and Options document below:

Introduction and Vision for Walsall

The Walsall Town Centre AAP is welcomed by Centro. It helps identify the location of potential new development and investment priorities in the area and helps make decisions on planning applications until 2026. Transport infrastructure and service provision should therefore be a key consideration in order to ensure all new areas are accessible, particularly by public transport, cycling and walking.

Boundary Issues and protecting cross boundary alignments

In respect of the AAP boundary, Centro has no comment on the specific boundary. Centro however stresses that cross boundary links should be considered in relation to sustainable modes of transport and that future rail and rapid transit alignments, radiating out from Walsall town centre to the wider region should be fully protected. These alignments as highlighted in Centro's long term vision documents "Towards a World Class Integrated Transport Network", its Metropolitan Freight Strategy and the "West Midlands Regional Rail Forum's rail vision" include:

- Walsall – Wednesbury - Brierley Hill – Stourbridge (5 Ws alignment and rail Walsall – Stourbridge corridor)
- Walsall – Wolverhampton (5 Ws alignment and the rail corridor)
- Walsall – Lichfield (rail corridor)

- Birmingham – Great Barr – Walsall (SPRINT – Bus Rapid Transit corridor) articulated vehicles to access Walsall town centre as part of a future Walsall – Great Barr – Birmingham route

These routes must be protected and safeguarded including all points of terminus in the town centre.

A Place for Shopping

Centro welcomes that the proposed retail sites for development, as all are well served by public transport. It is however important that there is a good public transport, walking and cycling network to support all developments in the area and that retail sites are connected well to other sites including residential, business and leisure developments and to essential services and facilities such as health and education.

A Place for Business and Investment

It is inevitable that any new jobs and services created in the town centre will attract associated journeys. By locating employment uses close to existing public transport connections, the opportunities for people to gain access by sustainable means will be increased and the potential for congestion of local roads by car journeys will be decreased. On this basis, sites within an acceptable walking distance of Walsall's Bus Station and rail station is preferred for new commercial development.

A place of Leisure and Living

No additional comments.

Good Transport, Movement and Accessibility

Centro supports a dedicated chapter on Transport, Movement and Accessibility which aims “to provide an opportunity to increase access to employment, education and training along with retail and leisure activities, increasing its proportion as the most sustainable location in the Borough”.

To ensure good connectivity takes place between new and existing land uses in the town centre, a supporting transport strategy will be required. As well as identifying transport infrastructure and service requirements, this should also set out how transport is intended to be delivered, phased and funded. Centro also recommend that cross boundary links be considered, particularly in relation to sustainable modes of transport and that all development is inter-connected and accessible. This will help to ensure easy access to and within the area by sustainable modes such as public transport, walking and cycling all contribute to social inclusion as well as the economy of the area.

8.2: Pedestrian movements/cycle parking

Centro supports Pedestrianisation Option 2. Partial de-pedestrianisation would allow buses into the Bridge and/or Park Street areas to allow greater penetration into the town centre and help connect the bus station to Bradford Place. This option would also help increase bus capacity and improve the flow of buses into the town centre.

Centro also requests where appropriate, planning conditions/agreements should be used to ensure that new development supports sustainable travel measures. This can be achieved through good cycling and walking links in the area (particularly connecting to public transport stops and stations and the centre), provision of cycle parking, and development of employer and residential travel plans with particular onus on personal travel planning for residential developments. Pedestrian and cycle routes should be direct, convenient, well lit and of a safe and secure design. Where appropriate,

enhancements should be made to the public realm to improve accessibility to public transport and increase the attractiveness of walking and cycling. For instance, there may be opportunities to improve surface materials, landscaping, lighting and pedestrian signage to enhance accessibility and travel by sustainable modes thereby promoting key gateways in the area such as Metro stops and bus stops/station.

We would therefore welcome the opportunity to investigate all options for improving access and connectivity in this area including public realm improvements and a supporting signage strategy which should also include cycling and walking links to public transport stops and services.

8.5: Bus Interchange

Regarding question 5 under 'Transport, Movement and Accessibility' Centro supports public transport Option 3: To redevelop Bradford Place Interchange on the Jerome Retail Park.

To demonstrate Centro's commitment to option 3, it should be noted that Centro, in partnership with local bus operators and Walsall Metropolitan Borough Council submitted an application to the Black Country Local Enterprise Partnerships Strategic Transport Board. The application requested funding of £7.82M to relocate the bus facilities at Bradford Place to a larger, fit-for-purpose' facility at Jerome Retail Park with improved bus access and heightened capacity, together with a package of supporting measures including improved wayfinding, cycle parking and signage to the transport hubs.

Jerome Business Park is located close to a number of prime development sites within Walsall town centre, thus highlighting the importance of an affective public transport interchange being required to serve the predicted 100,000 sqm of floorspace being developed in this area of the town centre. Furthermore, Centro's long term aspirations for high quality rail links to London and other towns and cities, the Chase Line electrification; and the various rapid transit options being investigated to link Walsall to Birmingham, Wolverhampton, the HS2 Interchange and Sutton and Brownhills/Lichfield, further supports the case for the importance of an improved interchange facility.

The bus interchange scheme is also supported by Centro's Integrated Transport Prospectus as part of a 'Strategic Transport Hub' and is required to support Walsall's wider public transport network and deliver the wider aims of economic regeneration.

8.5.5: Rapid Transit Links

A number of Rapid Transit routes are being proposed in Walsall including light rail tram-train corridors and Bus Rapid Transit schemes.

Centro has already identified routes where tram-train operation may be appropriate to create a high-quality, high frequency "Black Country Transport Spine", connecting with the existing heavy rail and Midland Metro networks. These potential Midland Metro (possibly using tram-train technology) routes include:

- Stourbridge – Walsall (with connection onto Midland Metro at Wednesbury)
- Walsall – Willenhall - Darlaston - Wolverhampton (as alternative to conventional heavy rail solution)

The Midland Metro proposal is not incompatible with the proposed reopening of the Stourbridge – Walsall heavy rail line. However, once the appropriate infrastructure and vehicle standards for the now authorised Sheffield – Rotherham tram-train trial has been established, there are likely to be future opportunities for tram-train services along this corridor.

Both schemes are primarily a proposal to upgrade the key transport corridors into a rapid transit for the Black Country network and if implemented, would provide high quality public transport attractive to car users as well as those without a car and would help to support a number of residential, employment and retail developments both within the Town Centre and beyond.

In addition, Centro aspires to a Rapid Transit Route. This route includes stations at the following locations:

- Walsall – Willenhall – Wednesfield – Wolverhampton

8.5.6: Walsall's Rail Network

Centro welcomes the importance of rail in the Town Centre AAP, particularly the importance of the Chase Line and the regional benefits this line will provide. However, the 'West Midlands Regional Rail Forum's rail vision' document highlights other potential re-opening of lines, together with additional stations which require new (or extensions to existing) services and varying degrees of infrastructure enhancements. These are highlighted below:

- 1) New Stations on lines without regular local passenger trains :
 - Walsall - Aldridge - Streetly - Sutton Coldfield – Walmley
 - Walsall – Wolverhampton
(including new stations at Willenhall and Darlaston)
- 2) Stations on Reopened Rail Routes
 - Stourbridge – Walsall - Lichfield (West Midlands Freight Spine)
(Including new stations at Pelsall and Brownhills)

Centro promotes the above line reopenings and additional stations in its current policy documents and requests that these routes be included in the Town Centre APP. Such improvements would ultimately lead to more trains accessing Walsall station and would create a positive impact on the growth of the town centre and Borough as a whole.

Furthermore, Centro has submitted an application to the Black Country Local Enterprise Partnership Strategic Transport Board to secure funding for a new Aldridge Station and the electrification of the line to Walsall. The scheme is supported by the West Midlands and Chiltern Route Utilisation Strategy and would provide connectivity and accessibility to destinations such as Walsall, Tame Bridge, Hamstead, Perry Bar, Aston, Birmingham and ultimately beyond to Birmingham International and Coventry.

8.5.6: Walsall Rail Station

Centro is supportive of Rail Station Option 1 in the AAP to redesign and expansion of the railway station to create greater capacity and wider improvements including electrification, signalling and additional platforms to provide enhanced capacity, speed, reliability and travel opportunities.

Centro recognises that the above rail line improvements, combined with the social and economic transformation HS2 will bring to the region requires an extension and enhancements to Walsall's existing station. As well as having the potential to significantly increase regional rail capacity, HS2 phase 1 will generate 22,000 jobs and increase economic output totalling £1.5 billion per year. Therefore in line with maximising these benefits, Centro aim to encourage excellent connectivity and

allow for significant numbers of people to access the rail network from Metropolitan Centre 'Strategic Interchange Hubs' of which Walsall station is a part of.

8.5.7: Taxi and Private Hire Provision

The current highway arrangements allow buses and taxis to share road space; however this has led to conflict between the two modes, on the approach to both Bradford Place and the bus station. Buses currently suffer from reliability problems in Walsall town centre due to vehicles ignoring traffic restrictions, inconsiderate/illegal parking and loading and taxi waiting areas. To reduce the impacts on bus passengers, Centro would request that traffic restrictions are enforced and orders are in place that prevents taxis from inhibiting bus movements, on the approach to bus interchanges.

Centro feel there is a need to provide additional taxi ranks at strategic locations, around the town centre to better cater for anticipated growth and segregate taxis from buses, to allow for the free flow of bus movements around the town. New locations for taxi ranks could include:

- Front part of the Council House
- Station Street

8.6 Road Network

It is vitally important that any junction and highway improvements do not adversely affect the current and future safe and efficient operation of bus services and where possible, bus priority should be incorporated into any improvements. Centro would welcome detailed discussions with Walsall MBC as schemes and proposals are developed.

Delivering the AAP

In order that the public transport network may be planned for accordingly, Centro would welcome continued joint working with Walsall MBC. We would welcome the opportunity to discuss potential opportunities, ongoing public transport infrastructure improvements and any matters regarding the long-term development of the public transport network more fully if to inform the ongoing development of the AAP.

To that end, all new development in the AAP area should ensure that the public transport network can be easily accessed and where appropriate, planning conditions/agreements should be used to ensure that new development supports walking, cycling and public transport access. In certain cases, it may also be appropriate to require that developer contributions are made towards the long-term development of the public transport network. Centro should be consulted further on significant proposals for new large scale development and would welcome continued joint working with Walsall MBC. It is vital that Walsall MBC continue to involve Centro in all relevant discussions and further development of the AAP as future proposals are likely to be of significance for current and future public transportation services and infrastructure serving the AAP area and its surrounds.

Conclusion

Centro has summarised below the key issues highlighted in this letter:-

- Centro requests a supporting transport strategy be developed to identify transport infrastructure and service requirements and how the public transport infrastructure required is intended to be delivered, phased and funded.

- A number of Rapid Transit routes are being proposed in Walsall including light rail tram-train corridors and Bus Rapid Transit schemes. All future rail and rapid transit alignments should be fully protected as highlighted in Centro's long term vision documents "Towards a World Class Integrated Transport Network", its Metropolitan Freight Strategy and rail vision.
- Centro supports Pedestrianisation Option 2: For partial de-pedestrianisation; allowing buses into the Bridge and/or Park Street areas to allow greater penetration into the town centre and help connect the bus station to Bradford Place.
- Centro supports public transport Option 3: To redevelop Bradford Place Interchange on the Jerome Retail Park.
- Other proposed rail line reopenings and additional stations, as highlighted in Centro's current policy documents including the "West Midlands Regional Rail Forum's rail vision" should be referenced in the document.
- Centro supports Rail Station Option 1, to redesign and expansion of the railway station to create greater capacity. With additional rail line improvements/reopenings, HS2 and Walsall station being a 'Strategic Interchange Hub' significant rail capacity is required to support these additional demands.
- Additional taxi ranks around the town centre, to segregate taxis from buses and allow for the free flow of bus movements around the town should be a priority.
- AAP area should ensure that where appropriate, planning conditions/agreements should be used to ensure that new development supports walking, cycling and public transport access. In certain cases, it may also be appropriate to require that developer contributions are made towards the long-term development of the public transport network.

An initial meeting is being organised in mid June to discuss those matters highlighted above further, to ensure the long-term development of the public transport network in Walsall town centre.

In the meantime, we would appreciate if we could be kept informed on the progress of the document and if you have any further queries or require additional information, please do not hesitate to contact me.

Yours faithfully,



MARIA-PILAR MACHANCOSES
ECONOMIC DEVELOPMENT TEAM

Contact Details**First Name – Peter****Surname - Leaver****Organisation / Company Name – Jones Lang LaSalle on behalf of the HCA****Address – 45 Church Street, Birmingham****Postcode - B3 2RT****Email Address – peter.leaver@eu.jll.com****Phone Number - 0121 214 9970****Unique reference number**

(if you have received a letter or email about this consultation please state the unique reference number here)

Please place an X in the one box that best describes you / your role in completing this consultation:

Resident or Individual		Local Authority	
Business		Public service provider e.g. education establishment, health etc	
Developer or Investor		Public agency / Organisation (on behalf of the HCA)	x
Landowner		Statutory Consultee	
Planning Agent or Consultant	x	Charity	
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation			

6. Walsall Town Centre – A Place for Leisure

This chapter looks at the current leisure, cultural and community facilities in the town Centre. It asks crucial questions about the location for a cinema and around the future of the Gala Baths. There are also some questions around maximising canalside locations in the town centre, the evening economy and the overnight accommodation offer.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. L:Q19	Comments
L:Q23	<p>HCA owns and is promoting the Waterfront North site for development as part of the wider regeneration of this part of the town centre.</p> <p>HCA supports strongly the AAP's objective of delivering this site for a large scale leisure development. A planning application for a multi-screen cinema and restaurants, bars, cafes and ancillary retail and leisure activities was submitted by a development partner in April 2013.</p> <p>However, Walsall has only limited capacity for such developments. Any competing proposals will harm the delivery of the submitted scheme and put back the site's regeneration. This could hold implications on other undeveloped regeneration land in the near vicinity (e.g. the Lex site – see response to INV:Q27).</p> <p>On this basis, HCA would support both Leisure Options 1 and 2.</p> <p>Should a similar leisure development scheme occur elsewhere in the town centre, consideration would need to be given to other main town centre uses. These would include retail, residential, offices, and other suitable uses. Such flexibility would be required, in these circumstances, in order for this key site to be delivered to the benefit of the town centre.</p>

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9. Walsall Town Centre – A Place for Investment

This chapter asks questions around the approach of promoting the Big Three (St. Matthew's Quarter, Gigaport, and Waterfront) and Park Street as the key areas for development in the centre and what uses should be located in these areas. This chapter also includes the 'Key Decisions' map where we have identified the sites where we think there are important choices to be made. These are the issues where we really want your views as we think they hold the key to the future of Walsall Town Centre.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. INV:Q4	Comments
INV:Q26	Re Waterfront North, for the reasons set out in response to L:Q23, HCA support both Options 1 and 2.
INV:Q27	HCA owns also and is promoting the Lex site for development. HCA would agree most with Option 3, as it considers Options 1 and 2 are too restrictive. A report considering the issues and justifying this position is appended.



Real value in a changing world

Walsall Town Centre Area Action Plan - Issues and Options

Waterfront Lex Site

Representations on behalf of the Homes and Communities Agency

24 May 2013

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1 Introduction

- 1.1 These representations are made on behalf of the Homes and Communities Agency (HCA). The scope of the representations are limited to the Waterfront Lex Site, that is fully owned by the HCA, and have no bearing on any other interest that HCA has in Walsall.
- 1.2 HCA welcomes the initiative of the Borough Council in producing this AAP. Moreover, HCA supports the general vision for the town centre, as set out in the Black Country Core Strategy (BCCS), and referred to on page 22, and the 10 objectives proposed by the AAP on pages 23 and 24 of the main document to the Issues and Options. These representations should be considered within this general framework of support and are intended to help the Borough Council deliver the successful development of what is a key gateway site to the town.
- 1.3 Sections 2, 3 and 4 to these representations provide a context. Section 2 provides a brief summary of relevant planning policy, with particular consideration to guidance contained in the National Planning Policy Framework (NPPF). Section 3 provides an overview of the characteristics and constraints of the site. Section 4 describes the marketing undertaken to date and the response received so far.
- 1.4 From this basis, Section 5 considers and explores what development opportunities there are for this site. This appraisal is mindful that the AAP covers the period to 2026 and, therefore, seeks to look beyond current market conditions.
- 1.5 Section 6 completes the representations, and gives a direct response to the various options put forward for the site and related policy.

2 Relevant Planning Policy

- 2.1 The AAP's principal reference points are the BCCS and the NPPF. However, it is interesting to note that an SPD for Walsall Waterfront was adopted in November 2006. The purpose of this SPD was to expand on policy WA12 of the Adopted UDP.
- 2.2 The SPD's vision of the site included a number of key points. These were:-
- Ensuring a thriving mixed use development
 - A sustainable living quarter
 - A new gateway and destination for Walsall.
- 2.3 In addition, the SPD gave guidance on which uses would be appropriate for the wider Waterfront Area. These were:-
- Leisure
 - Residential
 - Offices
 - Art/Cultural
 - Hotel
 - Retail
 - Water space.
- 2.4 A number of these uses were qualified (for example, retailing was only to be small scale). Nevertheless, it was also stated that any proposals for other uses would be considered on their merits and judged on their contribution towards the overall vision for the Waterfront and the vitality of the town centre.
- 2.5 The BCCS was adopted in 2011. Walsall Town Centre is designated as a strategic centre by Policy CSP1. It is earmarked for a significant level of growth during the plan period (2026). It notes further that strategic centres are to be the principal locations for major leisure, commercial, entertainment, cultural facilities, and services, such as hotels, which meet the needs of the sub-region and beyond.
- 2.6 Policy SC3 of the BCCS earmarks Walsall Waterfront for mixed use development. It identifies particular opportunities for leisure, residential and office development. It states that the primary shopping area will continue to be the preferred location for retail development.
- 2.7 The NPPF was published by Central Government in March 2012, shortly after the Budget of that year. Specifically, its publication was an important step by the Government in trying to simplify and demystify the planning process and to stimulate development and construction activity, which is now recognised as an important engine for growth in the wider economy.
- 2.8 For this reason, the NPPF reaffirms the presumption in favour of sustainable development. In paragraph 14, it emphasises that for plan-making this means that local planning authorities should positively seek opportunities to meet the development needs of their area.
- 2.9 In paragraph 17, 12 core principles are outlined. The third principle is to proactively drive and support sustainable economic development to develop the homes, business and industrial units, infrastructure and thriving local places that the country needs. Moreover, it is emphasised that plans should take account of market signals, such as land prices and housing affordability, and to set out a clear strategy for allocating sufficient land which is suitable for development.

- 2.10 Paragraphs 23-27 of the NPPF deal with town centres. In drawing up Local Plans, local planning authorities are encouraged to allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It notes that it is important that the needs for the main town centre uses are met in full and not compromised by limited site availability. In addition, it recognises that residential development can play an important role in ensuring the vitality of centres.
- 2.11 The NPPF provides specific guidance on plan-making. In paragraph 154, it advises that Local Plans should be aspirational but realistic. In addition, Local Plans should set out the opportunities for development and provide clear policies on what will or will not be permitted.
- 2.12 In paragraph 157 it advises that Local Plans should allocate sites to promote development and flexible use of land. This requirement for flexibility is matched by ensuring viability and deliverability. This is explained further by paragraph 173, which states ".....that pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable".

3 Site Characteristics and Constraints

Characteristics

- 3.1 The Waterfront Lex site is located on the Wolverhampton Road, the main route into Walsall Town Centre from the M6 motorway to the west. As such, the site has obvious prominence and presence.
- 3.2 The site forms the western end of the Walsall Waterfront, a prestigious regeneration scheme that has already delivered the Walsall Art Gallery, the popular Wharf Bar, over 300 departments in the Waves residential development by Jessups (to the south of the canal) and a new Premier Inn. In addition, earlier this month, a planning application was lodged by Kier Property for a £12 million leisure complex comprising an Odeon cinema and 9 restaurants on the Waterfront North site.
- 3.3 The site is a short walk from the Crown Wharf Retail Park and the retail core of Walsall. The Crown Wharf Retail Park has been a very successful scheme and attracted some of the country's best known retailers. The site adjoins also a travel agent superstore to the east.
- 3.4 The site is also close to Manor Hospital and the new Walsall College. This proximity to the hospital has helped take up in the Waves residential development referred to above.
- 3.5 The sites to the west of the site (the other side of the canal) and to the north (the other side of Wolverhampton Road) were both successfully developed for market housing, albeit in better market conditions, 10 years ago.
- 3.6 The site is cleared and available for development. The site has direct access to Wolverhampton Road and has prominent canal frontage on two sides.
- 3.7 In summary, the site is located within a truly mixed use area, involving retail, residential, leisure, cultural and institutional uses. It is very prominent and has the potential for a gateway development to the town centre.

Constraints

- 3.8 Whilst the site has many development opportunities, there are some significant constraints. These involve access, ground conditions and services.
- 3.9 The site is constrained by existing property and the canal on all sites except the north. Future access is therefore realistically limited to its northern perimeter. Access from the north occurs within an existing complex signalised junction arrangement. Due to the presence opposite the site of two segregated right turn queuing lanes into Wolverhampton Street, a right turn into or out of the Lex site is impossible. Therefore, the site is currently restricted to left turn in and out only.
- 3.10 Significant changes to the junction arrangement would be required to provide an alternative access (i.e. providing all movements). Any such changes would almost certainly have a negative impact on traffic capacity and, given the strategic importance of these junctions as part of the Walsall ring road, would not likely to gain approval from the Local Highway Authority. In addition, the cost of such changes would be prohibitive and commercially unviable.
- 3.11 This constraint will deter a number of operators, particularly those who require all-movements access to the site.
- 3.12 The site has historically be used as a gasworks, depot and vehicle maintenance garage. These activities have resulted in impacts to the shallow ground conditions. These impacts are manageable if considered as part of the site's overall redevelopment strategy. Nevertheless, they will represent an abnormal cost against development.
- 3.13 The site has been extensively investigated and work has been undertaken to remove former underground structures and obvious significant contamination. In addition, consultants URS have calculated the potential cost for the remediation of shallow soil and ground water hotspots using a probabilistic modelling technique known as

Monte Carlo simulation. The calculations undertaken by URS indicate that remediation of the site could be of between £270,000 (best case) and £465,000 (worst case).

- 3.14 Most of the services are in place, given the location of the site in Wolverhampton Street. However, there appears to be no evidence of any existing drainage connection from or to the site, nor discharge into the canal. This lack of obvious connection poses a risk to the site, both in terms of capacity and physical connection. Any new development will almost certainly require extensive on-site storm water attenuation and a highly restricted foul flow discharge. Connection will also require a temporary closure of Wolverhampton Street. Both of these will represent further abnormal costs against development.

4 Marketing

- 4.1 A marketing campaign to sell the site was undertaken in May 2012. We were retained by HCA to manage this process.
- 4.2 The principal elements to the marketing campaign were as follows:
- The erection of a marketing board on site;
 - The production of a marketing brochure (**Appendix 1**);
 - The mailshotting of this brochure to over 100 regional and local agents, regional and local developers and operators in the leisure sector;
 - A half page press release in the Express & Star Newspaper;
 - Details provided online on the CoStar, Jones Lang LaSalle and HCA websites.
- 4.3 The mailshot of brochures concentrated particularly on those agents, developers and operators active in the leisure sector. This was due to an expressed preference, in planning terms, for leisure uses for this site and Waterfront North.
- 4.4 The response to the campaign has been limited. No offers have been made and only two respondents have asked specifically to view the site.
- 4.5 Most initial enquiries to the mailshot were received from the leisure sector. However, none of these progressed to any meaningful stage. It is clear that interest in this sector is highly dependent on whether the proposed cinema development takes place at Waterfront North and operators have clearly stated they want to be immediately adjacent to the cinema. It is intended to refresh the marketing campaign once the position with this site has crystallised.
- 4.6 There have been a number of enquiries generated by the marketing board by residential developers and other uses (e.g. religious). However, again, none of these enquiries have progress further.

5 Development Opportunities

- 5.1 The marketing campaign was targeted to the leisure sector and was undertaken during a period of a very limited development in the West Midlands across virtually all sectors. Nevertheless, the response to date has been disappointing given the site's inherent characteristics.
- 5.2 This response indicates that a flexible approach is required and consideration be given to a reasonably wide number of uses in order to successfully develop the site. These uses should include:-
- Leisure
 - Retail
 - Residential
 - Offices
 - Institutional.

These are considered in turn below:

Leisure

- 5.3 The site is well related to existing and proposed leisure development and is prominent. On this basis, there is clear potential for this use, whether it be restaurants, hotel or other related uses (e.g. conferencing and banqueting).
- 5.4 However, the capacity for further development in this sector of Walsall is limited. The proposed Waterfront North development by Kier may help. However it may also soak up all the demand, particularly for restaurants. It is also not certain to take place as there is a competing scheme elsewhere in the town centre.
- 5.5 The market fundamentals for hotels for Walsall are not strong. Interest from this sector is limited and is not necessarily projected to improve significantly in better economic conditions.
- 5.6 Demand for conferencing and wedding venues has not been revealed by the marketing campaign undertaken.
- 5.7 Although the marketing campaign undertaken has not revealed positive interest in this sector, the position may change if the Waterfront North site is successfully developed for leisure uses. On this basis, leisure should be retained as a development option.

Retail

- 5.8 This is a strong retail location based on the site's clear relationship with the successful Crown Wharf Scheme (completed in 2005) and its obvious prominence. There may be clear demand from operators who are unable to locate on the Crown Wharf Scheme itself.
- 5.9 Clearly, there is a strong preference for retailing to be located within the primary shopping area. NPPF supports this general principle by application of the sequential test. However, the NPPF also permits consideration of edge of centre locations if suitable sites are not available in the town centre. In such cases, preference is to be given to accessible sites well connected to the town centre, such is the case with this site.
- 5.10 The site, given its size, location and prominence, may be attractive to a certain type of retailer who would not ordinarily be attracted to Walsall Town Centre. This could include a destination retailer, which attracts shoppers who do not often visit Walsall.
- 5.11 Section 4 - A Plan for Shopping - states that the town centre needs to attract new investment to provide a quality retail offer to maintain its role as a strategic centre. Earlier, it is noted that the town centre achieves no higher than 45% market share of its retail catchment expenditure.

- 5.12 As such, retail should not be overlooked as a development option for this site. Otherwise, it may be an opportunity lost for Walsall.

Residential

- 5.13 The BCCS key diagram for Walsall Town Centre (Figure 2.2), actually designates the site, and the wider Waterfront area, for new residential, although the annotation refers to mixed use development. To a certain extent, this recognises the contribution of residential to the development of this key regeneration area.
- 5.14 The Waves residential development of Waterfront South by Jessup has recently been completed and delivered 322 apartments. This has required sizable grant funding by HCA, through the Kickstart initiative, and has had to work hard to sell and let the accommodation.
- 5.15 This reflects to a certain extent the difficult market conditions, particularly in urban areas, experienced since the credit crunch of five years ago. Looking forward, it is clear that there is still some way to go until market confidence fully returns. However, in better market conditions, we would anticipate that the Lex site would be attractive to house builders. Certainly, the better market conditions of the late 1990s and early 2000s helped to deliver successfully two market housing schemes to the west and north of the site.
- 5.16 Therefore, we consider residential is a development option beyond the short term and should be included.

Offices

- 5.17 The market for offices in Walsall is very limited, with most stock dated. The development market for offices is best described as moribund. The only development that has taken place recently is a small scheme by Tesco required by condition in building its large superstore, as opposed to being a viable commercial development, and a new office built by and for Walsall Housing Group in the Gigaport area.
- 5.18 Therefore, the potential for office development of the site is pretty limited. Nevertheless, given the site's prominence, the prospect of a new office solus occupied by one company (on a similar basis as Walsall Housing Group) cannot and should not be discounted.

Institutional

- 5.19 Finally, given the site's proximity to Manor Hospital and Walsall College, there is a chance that medical or educational related uses could be attracted.

6 Response to Options

- 6.1 Section 9 - A Place for Investment - gives particular consideration to the Waterfront area, including the Lex Site. Three options are posed for the latter. These can be summarised as:-
- 1) Allocation for leisure
 - 2) Allocation for residential
 - 3) Allocation for any appropriate town centre use.
- 6.2 In response to INV:Q27, HCA would agree most with Option 3. Options 1 and 2 are far too restrictive.
- 6.3 As referred to above, the demand for leisure is uncertain at best. Marketing undertaken reveals a cautious approach amongst the restaurant operators. Much depends on the success of the Waterfront North Scheme. Even then, this scheme if successful could absorb all demand in this sector. Demand for hotel, conferencing and banqueting has not been demonstrated by the marketing campaign and the market fundamentals for hotels in Walsall are not strong.
- 6.4 We see clear potential for residential, particularly in the medium term in better economic conditions. However, this market is also uncertain with the Jessup's scheme requiring significant funding. This scheme will also absorb significant demand for town centre living in Walsall over the next few years.
- 6.5 Instead, we have concluded that a flexible approach to uses is the best means to ensure that the site delivers a good quality development. Such an approach reflects best the site's characteristics, particularly as a gateway to Walsall Town Centre on its main arterial road, and current market uncertainties.
- 6.6 We would advocate that the site be allocated for appropriate town centre uses, with preference given to:
- Leisure
 - Retail (subject to the application of sequential test as an edge of centre site)
 - Residential
 - Offices
 - Institutional (e.g. medical or educational related).
- 6.7 In addition, we consider guidance should be given stating that the site could be developed on a solus use basis or as a mix of these uses. Requiring a mix of uses could be a further constraining factor.
- 6.8 Finally, the Waterfront Lex Site is referred to in other sections of the draft AAP, with reference particularly to leisure, housing and business. The comments we make with regard to INV:Q27 apply equally to these references.

Appendix 1 - Marketing Brochure



Real value in a changing world

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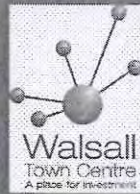
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For Sale

Freehold Development Site

Walsall Waterfront - Lex
Wolverhampton Road, Walsall, WS2 8DD

Approx. 0.895 Hectares
(2.21 Acres)



Location

This prime development site is located on the Wolverhampton Rd, the main route into Walsall Town Centre from the west.

The site forms the western end of the Walsall Waterfront, a prestigious regeneration scheme that has already delivered The Walsall Art Gallery, the popular Wharf Bar, and over three hundred apartments in The Waves residential development. A new Premier Inn is currently under construction.

The site is a short walk from the Crown Wharf Retail Park and the retail core of Walsall. It is close to the Manor Hospital and the new Walsall College. It also benefits from being only a few minutes' drive from junction 10 of the M6.

Description

This is a cleared development site with direct access from the Wolverhampton Road.

The site has prominent canal frontage to two sides.

Area

We understand the site extends to 0.895 Hectares (2.21 acres).

Asking price

Offers invited

Tenure

Available on a freehold basis.

Legal Costs

Each party to bear its own legal costs incurred in the transaction.

Viewing

The site is easily viewed externally from the public highway. Site inspections will be available on request.



Site Information

Additional information is attached in this document. This information cannot be relied on for any purpose, but we advise that any prospective purchaser considers the information included closely with their professional advisors before proceeding with an offer

Contact

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Subject to Contract

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1 Planning

The following Planning report is provided by Jones Lang LaSalle on behalf of the Homes and Communities Agency purely for information purposes. It cannot be relied on by any potential bidder or other third party. We strongly advise all interested parties to procure their own advice and engage with Walsall Metropolitan Borough Council on the issues discussed below.

Black Country Core Strategy 2011

Walsall Town Centre is designated as a 'strategic centre' (Policy CSP1 'The Growth Network') and ear marked for a significant level of growth during the plan period. The Strategic Centres are also the principal locations for major leisure, commercial leisure, entertainment, cultural facilities and services, such as hotels, which meet the needs of the sub-region and beyond. In addition, the BCCS highlights Walsall as a potential location for cinema provision.

Policy SC3 earmarks Walsall Waterfront for mixed use development, and identifies opportunities in this area for leisure, residential and office development at Walsall Waterfront. Policy SC3 indicates that growth in convenience floor space in Walsall is likely to be met by the new Tesco (which was completed in 2010). However, the Primary Shopping Area (PSA) will continue to be the preferred location for retail development and the site falls outside the PSA. The policy also provides scope for more leisure facilities given that there is no cinema or major entertainment value currently in Walsall. The need for a Hotel and Conference Facilities is also highlighted.

The Walsall Unitary Development Plan

The site is located within an area designated as a 'development opportunity'. In addition, there are several general policies which may be relevant to the subject site, depending upon the nature of uses that are brought forward. The most pertinent is Policy WA12: Town Wharf ('Walsall Waterfront') which provides more detail to guide the development of sites within Walsall Waterfront. It states that:

'The land within this area represents a continuation of second phase of the Town Wharf development; the possibility exists to consolidate the previous two phases and maximise the opportunity offered by this canal side location. The Council will require particularly high standards of design in this area, this should be reflected not only in relation to the future construction of buildings, but also in the relationship to the canal, and the quality of public space, with the aim that the development should provide a major gateway to enhance the town centre as a whole.'

It also states that:

'The area on both sides of the canal is considered by Policy WA12 to be the main location in the town centre for substantial leisure development to serve the borough and surrounding areas. Accordingly, this policy provides that the location should be developed principally for the leisure uses that can serve all sections of the community, and examples of uses that would be particularly welcome by the Council include cinema, a family entertainment centre and an adventure activity centre.'

In addition, Policy WA12 provides some scope for associated bar/restaurants which could be provided, provided that they form part of a comprehensive scheme to provide major facilities. Other appropriate uses would include

hotel, conference facilities, cultural uses and office/business uses (including small scale craft based activities) to compliment development primarily for leisure uses. Policy WA12 provides that retail uses, except small scale, complimentary activities, will not be permitted.

Policy WA12 does provide some scope for residential uses, which 'may be acceptable in appropriate locations as part of a comprehensive scheme'. However, any residential uses will be required to provide an acceptable residential environment without constraining the development of leisure and other commercial uses or the existing operations of nearby industry.'

Supplementary Planning Document for Walsall Waterfront (8th November 2006)

The Supplementary Planning Document (SPD) for Walsall Waterfront provides detailed planning, urban design, land use and marketing guidance for the future development of the Walsall Waterfront area (within which the subject site sits). The purpose of this SPD is to expand on Policy WA12 of the UDP.

Key elements of the vision include ensuring a thriving mixed use development; a sustainable living quarter; and a new gateway and destination for Walsall. The SPD highlights Walsall's position on the national waterway map, and the need to achieve the delivery of world class architecture and public art in a form which reflects the unique waterside, cultural and urban character of the area.

Section 5 sets out the following uses which will be appropriate for Walsall Waterfront as set out below:

- Leisure – the area on both sides of the canal should be developed principally for leisure uses. A cinema, family entertainment centre and adventure activity centre would be particularly welcomed. Other leisure uses could include places of worship, health facilities, community facilities, training centres, cinemas, concert halls, conference facilities, sports facilities, casinos, bingo halls, theatres, nightclubs, health facilities and fitness centres and other commercial leisure uses such as bowling centres. Bars, cafes and restaurants would be encouraged, provided they form part of a comprehensive scheme to provide major facilities.
- Residential – an appropriate mix of units is required although this should not constrain the development of leisure or other commercial uses in the development.
- Offices – both B1 (a) and A2 (Financial and Professional Services) will be welcome to complement development principally for leisure uses. In addition, B1 (b) Research and Development uses or small craft based activities would also be considered appropriate.
- Art/Cultural – the provision of a cultural attraction at this strategic gateway location will be promoted, as will the provision of public artworks across the Waterfront Area.
- Hotel – any such development must be a leader in high quality design, setting the standard locally for other developments in this sector.
- Retail – some small scale (complementary food or non-food retailing) will be acceptable.
- Water space – the potential for water borne activity including visitor facilities, moorings and other essential boat facilities and services should be considered if they are compatible with other development aspirations.
- Any proposals for other uses would be considered on their merits, and judged on their contribution towards the overall vision for the Waterfront and vitality of the town centre.

Walsall Town Centre Area Action Plan

The Council is currently preparing an Area Action Plan for Walsall Town Centre, and the Issues and Options Paper will be made available for public consultation in summer 2012. The Issues and Options Paper will recognise Walsall Waterfront as a key investment opportunity in the town centre which is suitable for leisure-led development activity, particularly for conference, banqueting, hotel and cinema uses, with associated bars and restaurants. Given the specific nature of the Lex site, with its high quality dual canal frontage, it is considered appropriate for hotel and conference facilities. A high standard of design in this prominent location will be required.

2 Ground Conditions

The following report is provided by URS on behalf of the Homes and Communities Agency purely for information purposes. It cannot be relied on by any potential bidder or other third party. We strongly advise all interested parties to procure their own advice and engage with Walsall Metropolitan Borough Council on the issues discussed below.

Introduction

The Lex site has historically been used as a gas works, depot and vehicle maintenance garage. These activities have resulted in impacts to the shallow ground conditions that are manageable if considered as part of the site's overall redevelopment strategy.

The site has been extensively investigated, assessed and remediated but some additional works will be required during redevelopment to meet the Local Authority and Environment Agency's expectations.

Ground Conditions

The site is underlain by a variable thickness of Made Ground, overlying glacial till deposits (clay) and Coal Measures (mudstone). The Coal Measures in turn overlie Limestone. The investigation has defined two groundwater units separated by the glacial deposits and coal measures.

Shallow groundwater is not considered to be a particularly sensitive receptor but it is possible that it may act as a pathway for contamination to reach an adjacent canal. Deeper groundwater in the limestone appears to be protected from the shallow groundwater contamination by the intervening clay and mudstone and groundwater at this depth would not interact with the canal in the same way.

There have been no historic mining features encountered during investigations at the site e.g. shallow abandoned workings in the Coal Measures or deep abandoned workings in the deeper Limestone. There are not believed to be any shafts within the site boundaries or within influencing distance from it.

Part of the site falls within a Limestone Mines Consideration Zone. This would limit development in that element of the site to four storeys maximum height.

Ground gas monitoring to date suggests that there is a low potential for ground gas and that ground gas control measures in buildings would not be necessary, although further monitoring is being undertaken to confirm this.

Soil Contamination

The site has been extensively investigated and work has been undertaken to remove former underground structures and obvious significant contamination. However, residual soil contamination has been found to remain across the site and it is possible that other as-yet-unidentified soil hotspots could be present. This contamination is not considered to pose a risk to human health if the site is developed for commercial use, with a site wide cover of hard standing and buildings. It is assumed that buildings constructed at the site will incorporate a suitable vapour impermeable barrier within buildings, e.g. 'Protech GM HH' Membrane or similar.

It is assumed that landscaping areas incorporated within the development would be limited to landscaped verges and planting beds where clean Topsoil and Subsoil should be imported. This would provide a suitable growing medium and act to limit the potential for future site users to come into contact with underlying soils in the limited areas where hard standing is absent.

Groundwater Contamination

Localised residual contamination of shallow groundwater has been detected, the extent of which appears to be limited to two discrete areas of the site; an area near the northern site boundary (RC2/12 on attached plan) and an area in the southern part of the site (BH3/12 on attached plan). It is also possible that as-yet-identified shallow groundwater contamination is present.

The area of contamination near the northern boundary is not considered to be of significant concern due to its distance from the canal. Furthermore it is likely that this area of contamination is being caused by a now off-site historical part of the former gas works that is now beneath the Wolverhampton Road i.e. an area beyond the northern boundary of the site. However, the contamination in the southern part of the site could pose a risk to the canal bordering the site to the south and southwest

A remediation options appraisal was undertaken; this identified In-Situ Chemical Oxidation as the most appropriate method of addressing the areas of shallow groundwater contamination. This is a rapid, powerful and cost effective remediation technology for the treatment of contamination in groundwater and should be able to achieve significant reductions in contaminant concentrations within a short time period. The technique involves the injection of oxidising agents into the groundwater. The reaction between the oxidising agent and a catalyst initiates a chain reaction that rapidly degrades particular contaminants into environmentally benign end products.

Potential Remediation Costs

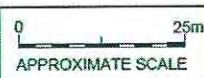
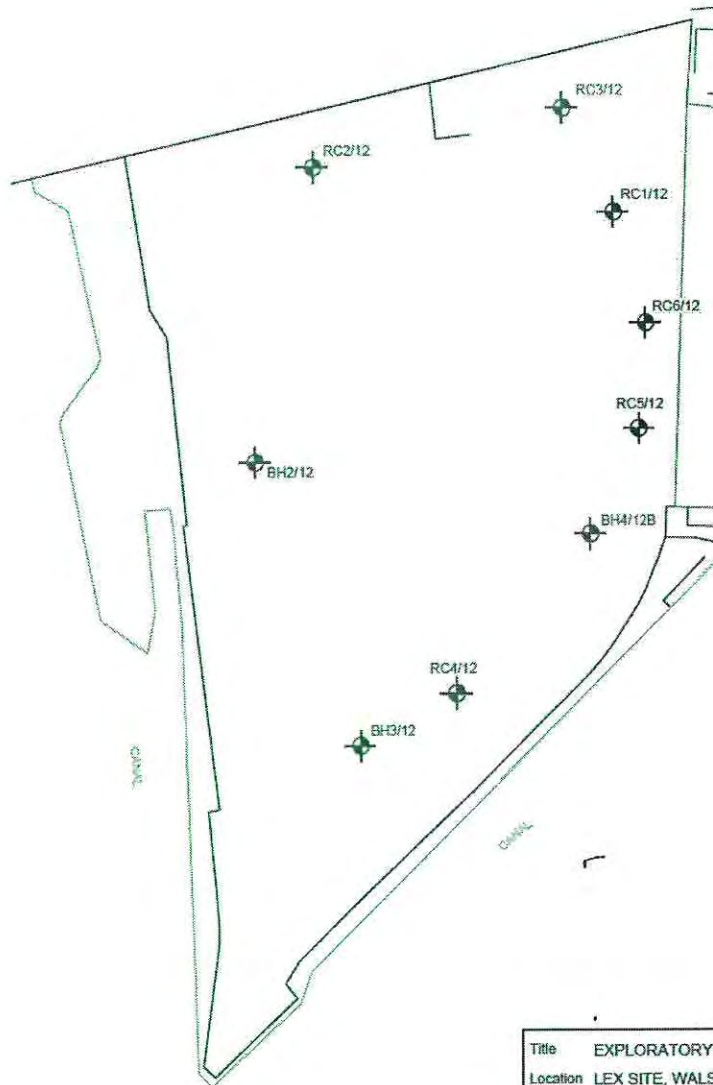
Potential costs were calculated for the remediation of shallow soil and groundwater hotspots using a probabilistic modelling technique known as a Monte Carlo simulation. The calculations made the following key assumptions:

- Some limited removal of impacted soil may be required extending to no more than the depth of the water table (approximately 1.5 m). Excavated material that is not suitable for on-site treatment and re-use would be disposed of off-site, mostly as non-hazardous waste, to a suitably licensed landfill site;
- There are three areas of the site that would require the application of chemical oxidation to target shallow groundwater contamination. This does not include the area to the north, but allows for treatment of the area to the south and potentially two other areas that might be identified during the course of the development; and
- It is assumed that the source of the groundwater contamination is gradually reducing over time which is consistent with the fact that the site has undergone various phases of remediation whereby contaminated materials have been removed from site.

Calculations undertaken by URS indicate that remediation at the site to permit development could be in the order of £260k (20%ile or best case) to £515k (80%ile of reasonable worst case).

KEY:

-  URS Shallow GW Monitoring Well
(~5.5m depth, in Glacial Till/Middle Coal Measures)
-  URS Mid-Depth GW Monitoring Well
(~9.5m depth, in Glacial Till/Middle Coal Measures)
-  URS Deep GW Monitoring Well
(16m depth, in Wenlock Limestone)
-  URS Deep Borehole (60m depth, no installation)



Title			EXPLORATORY HOLE LOCATION PLAN			
Location			LEX SITE, WALSHALL WATERFRONT			
Client			HOMES AND COMMUNITIES AGENCY			
URS		App'd:	Drawn:	Date:		
		PH	JC	March 2012		
		FINAL		Ref:		PH/JC/BHM
		Scale:		Job No:		47061516
AS SHOWN		Org. Size:		A4		
				FIGURE 3a		

3 Transportation

The following report is provided by Ove Arup on behalf of the Homes and Communities Agency purely for information purposes. It cannot be relied on by any potential bidder or other third party. We strongly advise all interested parties to procure their own advice and engage with Walsall Metropolitan Borough Council on the issues discussed below.

Introduction

This note considers the Transportation aspects relating to the Lex development site in Walsall. The note addresses the existing access and road network, and potential access options/constraints.



Photo 1 – Looking east from site access



Photo 2 – Looking west from site access

The Site

The development site is the Walsall Lex site which is located on the western edge of the town centre, just inside the ring road.

The Walsall Lex Site is located off the A4148 Wolverhampton Road and is bounded by the Walsall Canal to the south and west, and the First Choice travel agents to the east. The Wolverhampton Road marks the northern boundary. The site is currently unused but was previously occupied by a car dealership.

Existing Access and Local Road Network

The Walsall Lex site has one point of access which is in the form of a dropped kerb. This access is located on the A4148 Wolverhampton Road which forms part of the Walsall ring road. The access is located approximately 50m west of the A4148/ Wolverhampton Street junction, at the point where the Wolverhampton Street traffic joins the A4148.

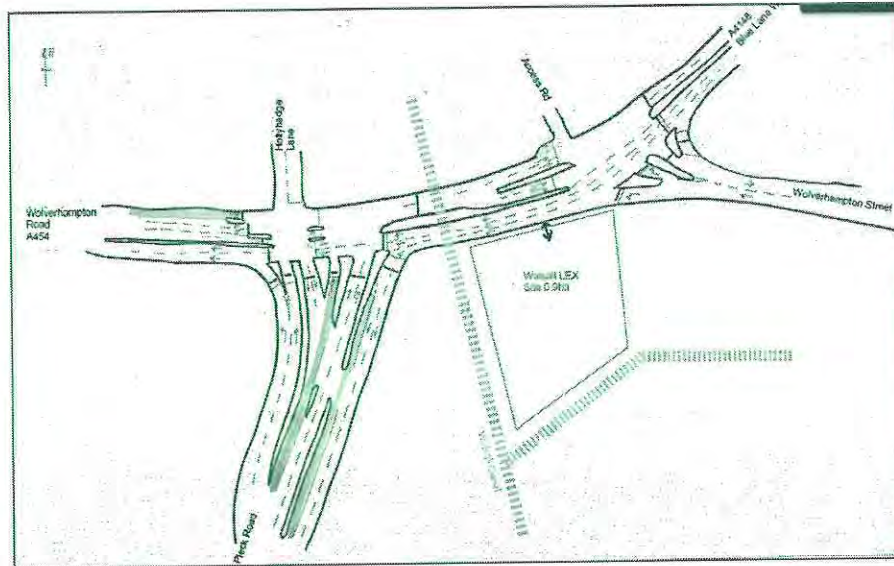


Figure 1 – Site location

Proposed Future Access

The Walsall Lex site is constrained by existing property and the canal on all sides except the north. Future access is therefore realistically limited to this northern perimeter. Access over the canal would require bridge structures with lengthy approach ramps to achieve the necessary clearance over the canal. No space exists for such approach ramps within the site, and costs would be prohibitive. Any access across the canal would also have to cross third party land and would have to 'fit' within the constraints on other roads.

Access from the north occurs within an existing complex signalised junction arrangement. Due to the presence opposite the site of two segregated right turn queuing lanes into Wolverhampton Street, a right turn into or out of the Walsall Lex site is impossible with this current road arrangement. The site is therefore restricted to left turn in and out only.

Changes to the junction arrangement to incorporate a right turn option for the Walsall Lex site, would require significant remodelling of the surrounding junction network. The A4148 junctions and the junction with Pleck Road is a strategic ring road junction that the Highway Authority has just upgraded. Significant resistance to any modifications would be anticipated from the local Highway Authority.

In addition the Walsall Lex site access is located between two major junctions approximately 100m apart, it would be impossible to incorporate another junction with adequate spacing to comply with highway guidance. Additional signalised phasing would be required in the existing arrangement to achieve a right turn access. This would have major impact on queuing and traffic flow within the area, as well as access of the site. To overcome this additional signalling, a wholesale change of the junction would be required.

Any change to the junctions would have major capacity implications creating queuing and traffic flow issues within the area, as well as access of the site. The cost benefit analysis for any changes would be prohibitive, given the overall limited budget for the site and would not be commercially viable.

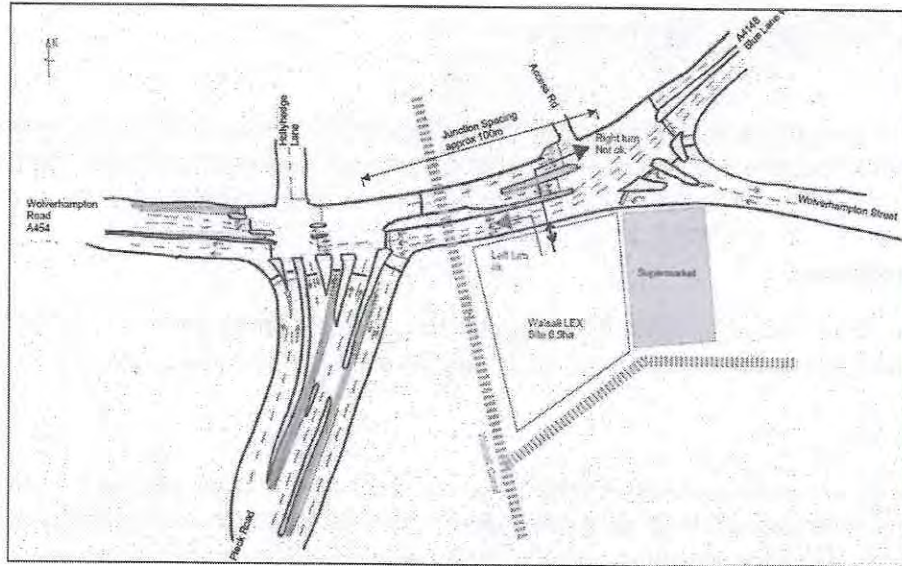


Figure 2 – Future Access Restrictions

Summary

The only viable access point to the site is from the northern edge off Wolverhampton Road. The current left in left out access arrangement is the only option at this location due to the current arrangement of the adjacent junctions. Significant changes to the junction arrangement would be required to provide an alternative access. Given the junction proximities, any such changes would have a negative impact on traffic capacity. Given the strategic importance of these junctions as part of the Walsall ring road, any detrimental changes would therefore not gain approval from the local Highway Authority. The cost benefit analysis of such changes would also prove commercial unviable.

To provide access from other directions will require dedicated signage of alternative routes, or phasing of the lights to allow for a safe U-turn manoeuvre.

4 Utilities / Services

The following report is provided by Ove Arup on behalf of the Homes and Communities Agency purely for information purposes. It cannot be relied on by any potential bidder or other third party. We strongly advise all interested parties to procure their own advice on the issues discussed below.

Introduction

This note considers the Utilities relating to the proposed Walsall Lex site development. The note addresses the existing utility constraints on the site, and is based on site inspection and statutory authority records.

The Site

The site is located on the western edge of the town centre adjacent to the ring road. It is bounded by the Walsall Canal to the south and west, and a travel agents to the east. The site is currently derelict following site clearance in 2006. It was formally used as a car dealership, and prior to that a gas works and depot.

Water

Water is served by South Staffordshire Water. An existing 90mm MDPE water main hydrant is located in the roadway directly in front of the site, which is a branch from an existing main on the northern side of Wolverhampton Street. No provision is indicated entering the site, although it can be assumed that a supply would have existed for the previous uses.

The location of the water main would suggest that any new connection would require partial closure of Wolverhampton Road during the works.

Telecoms

Telecoms are served by BT and Virgin Media. BT has existing underground cabling in the footway and central reserve of Wolverhampton Road at the front of the site. Junction box 331 is located to the far north east of the site, and any modification to the footway here to create an access would cause disruption to these services. BT records indicate that there is both a capped underground supply to the site and an overhead connection within the site. Neither of these is apparent on site and it is anticipated that the records are out of date.

Virgin Media have a fibre optic network feeding the travel agents to the eastern edge of the site. It is feasible that this network could be extended toward the Lex site for minimal cost.

Electricity

Electricity is provided by Western Power Distribution. An 11kv cable is present at the back of the footpath adjacent to the frontage of the site, and care should therefore be taken with any ground works along this boundary. A LV service cable also exists along the back of the footpath, most likely serving street lighting and signage illumination. A connecting spur is shown entering these tie to a building that no longer exists. It is assumed that this cable was disconnected at the time of demolition of the building shown, but care and attention should be taken before excavating in this area on site, to determine if the cable still exists.

Gas

Gas is provided by National Grid. A 24" (600mm) Low Pressure gas main is present at the front of the footpath adjacent to the frontage of the site. There is no indication of past or present supply to the site.

Drainage

Drainage is served by Severn Trent Water. Records do not show any indication of sewers directly in front of the site. An existing 450mm combined sewer flows east along Wolverhampton Street ultimately discharging to Ford Brook to the south east. There is no historical evidence for flooding in the sewer system. There is no evidence on any existing connection from the site, nor discharge into the Canal.

This lack of obvious connection poses a risk to the site, both for capacity and physical connection point. Any new development will most likely require extensive on-site storm water attenuation, and highly restricted foul flow discharge, a connection for which will require temporary closure of Wolverhampton Street.

Summary

Utility	Location	Comment
Water	Main present in Wolverhampton Road	Partial closure of Wolverhampton Road will be required in order to install a connection.
Telecoms	BT cables present in footpath and Virgin media on adjacent site.	Telecoms connections should be available for the site.
Electricity	11kv and local LV cables present on site frontage border.	Supplies should be available, any boundary works to be undertaken with care.
Gas	600mm LP main in frontage footpath.	Gas supplies should be available for the site.
Drainage	No adjacent drainage. 450mm combined sewer to far north east.	Possible site risk, anticipated large attenuation demand and restricted foul flow discharge. Wolverhampton St closure required for making a connection.

Until such time that an accurate estimate of the likely use of the Lex site is determined, and utility demands can be estimated, it is not possible to determine if adequate capacity exists in the adjacent utilities. Further developer enquiries will be required to determine such demands.

Contamination Concerns

Due to the nature of the contamination on site it may be necessary for upgraded materials to be utilised during the installation of utilities that are suitable for the ground conditions encountered.

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Planning and Architecture | advice | applications | drawings

Our ref. 8981 CL1 HRW

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Walsall
WS1 1DG

Email: LDF@walsall.gov.uk

3rd June 2013

Dear Sir/Madam,

**Walsall Town Centre Area Action Plan 'A Place for Everyone'
Issues and Options: Formal Representations on behalf of the
Police and Crime Commissioner for West Midlands**

We act for the Police and Crime Commissioner for West Midlands (PCCWM), formerly known as West Midlands Police Authority. We are grateful to Walsall MBC for giving the PCCWM the opportunity to comment on the Walsall Town Centre Area Action Plan (AAP) Issues and Options. We are instructed to make representations on local development documents in respect of securing policy reference in such documents to, amongst other matters:

- recognise the community need for securing safe environments with crime reduction made a priority;
- ensure the timely and effective engagement of the police and other emergency services to ensure effective delivery of infrastructure projects required as a result of development growth with the recognition that the police are a social infrastructure delivery agency; and
- in appropriate cases, seek financial contributions towards the additional expenditure burden placed on the Police Force as a consequence of development proposals and growth.

The PCCWM clearly has a statutory duty to secure the maintenance of an efficient and effective police force for its area and, of course, the Council is also statutorily required to consider crime and disorder and community safety in the exercise of its duties with the aim of achieving a reduction in crime and helping to create environments where crime and disorder, and the fear of

crime, do not undermine quality of life or community cohesion. Our detailed comments are set out below:

National Planning Policy

1. The **National Planning Policy Framework (NPPF)**, March 2012, paragraph 156 sets out the strategic priorities for local planning authorities, including, '*the provision of health, security, community and cultural infrastructure...*' Security is therefore a national strategic planning objective for local authorities.
2. Chapter 7, 'Requiring Good Design' paragraph 58 requires local and neighborhood plans to have policies which should aim to ensure that developments, '*...create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion...*'
3. This message is repeated in Chapter 8 'Promoting Healthy Communities' paragraph 69 which recognises that '*The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities...Planning policies and decisions, in turn, should aim to achieve places which promote ... safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.*'
4. It is significant that within the streamlined national planning policy framework, the need to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion is repeated. This clearly demonstrates the importance and weight which the government attaches to this requirement in order to deliver sustainable development.
5. As you will be aware, since the end of March 2013, if there is any inconsistency between the adopted Black Country Core Strategy's, overarching local planning policies and the NPPF then policies within the NPPF will take precedence.

Detailed Comments on the Walsall Town Centre AAP

Chapter 1: Introduction

6. Whilst the PCCWM recognise that the section on 'Existing Planning Policy' is a summary and it is not expected to be fully comprehensive, they nevertheless believe that issues of crime and safety are fundamentally important and should be included within the core land-use planning principles that underpin both plan making and decision taking as required in the NPPF. The PCCWM formally request that reference is made in this section to the need to create environments where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion.

Chapter 3: The Vision for Walsall Town Centre

7. The PCCWM **OBJECTS** to the lack of any reference to the need to seek to ensure safe and secure communities and environments within the AAP's objectives. This requirement is identified in the NPPF paragraph 156 which states that one of the strategic priorities for local planning authorities is 'the provision of health, security, community and cultural infrastructure...' as well as paragraphs 58 and 69 which require local authorities to create environments where crime and disorder, and the fear of crime do not undermine the quality of life or community cohesion. Without reference to crime and disorder the AAP would be **UNSOUND**. We therefore formally request that two additional objectives are included within the Preferred Options version of the AAP as follows:

- To deliver a healthy, inclusive, safe and crime free environment with good access to key services and timely provision of appropriate infrastructure; and
- To ensure high quality design in all developments which will positively contribute towards the regeneration of the urban environment, including designing out crime to create environments where crime and disorder and the fear of crime do not undermine quality of life or community cohesion.

Chapter 6: A Place for Leisure

8. The PCCWM request that consideration of measures to reduce crime and the fear of crime be included as an additional key issue within this section. Measures to promote a reduction in crime and the fear of crime could make a valuable contribution towards enhancing the appeal and success of Walsall Town Centre. The PCCWM support the proposal to promote more family friendly evening entertainment and facilities.
9. The PCCWM formally request that the evening and night-time economy be considered separately with policies put in place to minimise anti-social behavior which can have a negative impact on the vitality of the area with potential for higher crime rates and the local community feeling less safe. It is requested that a policy be included in the AAP which promotes a strong evening and night-time economy which is safe, balanced and socially responsible. Measures to achieve this may include expanded CCTV coverage, expanded and/or improved street lighting as well as adequate public transport and public toilet facilities. The objective would be to ensure that development proposals create safe and attractive streets and public spaces which reduce crime and the fear of crime and consider the impact of development proposals on public safety and the incidence of anti-social behaviour.

Chapter 7: A Place for Living

10. The PCCWM concur with the view that residential development can provide an opportunity for improved surveillance and activity. However, the PCCWM consider that this opportunity needs to be formalised and broadened to include a requirement for consideration of crime prevention issued in the design of all Walsall Town Centre development proposals within paragraph 7.6.3 'The Design of New Buildings'. The PCCWM formally request that the following policy wording be included within the AAP:
 - Development proposals should promote safe and secure communities by applying 'secured by design' principles. All Design and Access Statements should include information to demonstrate how proposals address community safety and crime prevention.
11. The PCCWM formally request that paragraph 7.5 'Community Facilities' be expanded to include community and social facilities. It is important to ensure that existing Police and other emergency service facilities are safeguarded and new facilities are promoted where necessary. In order to ensure that services and facilities are able to respond effectively to any increased demand resulting from proposed growth in the Town Centre, there may be a need for the PCCWM to receive financial contributions towards essential infrastructure from funds raised through the Community Infrastructure Levy (CIL), once adopted, and Section 106 Agreements to help bridge any funding gap.

Summary

12. The Walsall Town Centre Area Action Plan is currently **UN SOUND** because it does not fully accord with the requirements of national planning policy. The PCCWM formally request that the Preferred Options version of the AAP include explicit reference to crime considerations to comply with national planning policies. Currently the AAP does not adequately address the need to create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.

13. The PCCWM formally request that amendments are made as follows:

- include within the 'Introduction' section on exiting national policy reference to the need to create environments where crime and disorder and the fear of crime do not undermine quality of life or community cohesion;
- include within the vision objectives of the AAP the need to deliver a healthy, inclusive, safe and crime free environment with good access to key services and timely provision of appropriate infrastructure;
- include within the vision objectives of the AAP the need to ensure high quality design in all developments which will positively contribute towards the regeneration of the urban environment, including designing out crime to create environments where crime and disorder and the fear of crime do not undermine quality of life or community cohesion;
- include a policy which promotes a strong evening and night-time economy which is safe, balanced and socially responsible;
- include a policy which requires development proposals to promote safe and secure communities by applying 'secured by design' principles and for all Design and Access Statements to include information to demonstrate how proposals address community safety and crime prevention; and
- include consideration of the police and other emergency services within chapter 7 with the recognition that, as a consequence of planned growth, there may be a requirement for financial contributions from developers.

My Clients should be grateful if you would take these representations into consideration when preparing the Preferred Options version of the Walsall Town Centre AAP.

Please would you confirm receipt of this letter of representation and let us know if we can be of any further assistance.

Kind regards,

Yours sincerely,

Helen Winkler Bsc(Hons) DipTP MRTPI
Planning Consultant
h.winkler@tyler-parkes.co.uk



Contact Details**First Name Phil****Surname Griffin****Organisation /Company Name Walsall CCG****Address Jubilee House, Bloxwich Lane, Walsall****Postcode WS2 7JL****Email Address phil.griffin@walsall.nhs.uk****Phone Number 01922 618390****Unique reference number**

(if you have received a letter or email about this consultation please state the unique reference number here)

Please place an X in the one box that best describes you / your role in completing this consultation:

Resident or Individual		Local Authority	
Business		Public service provider e.g. education establishment, health etc	X
Developer or Investor		Public agency / organisation	
Landowner		Statutory Consultee	
Planning Agent or Consultant		Charity	
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation			

1. Introduction, 2. What is Walsall Town Centre? and

3. The Vision for Walsall Town Centre

The introduction sets out what the Area Action Plan is, the structure of the document and the planning context. It also explains about the Sustainability Appraisal of the plan, which you can also comment on. Chapter 2 gives an introduction to the context of Walsall town centre by looking at its location and role within the wider Borough. It also covers the key challenges which are facing the town centre. This chapter includes questions and options around the proposed boundary for the AAP for your consideration. The third chapter introduces the vision and objectives for the town centre before asking if this aligns with your aspirations for Walsall.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. TCB:Q1	Comments
Q1	The vision stated on page 5 is supported.

4. Walsall Town Centre – A Place for Shopping

This chapter asks you questions about the current shopping experience in Walsall and the existing retail offer. It also asks questions about the Primary Shopping Area and the locations for potential new retail development. Another key focus of this chapter is the future of Walsall Market and we ask for your view of the best location for a permanent home for the market.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. S:Q8	Comments
S: Q2 and S: Q4	<p>The contribution of retail and also of the Walsall market must not be underestimated. This is particularly in relation to mental health and general wellbeing of the Walsall population therefore the proposals that are set out are supported.</p> <p>We have no particular preference for any of the options detailed</p>

5. Walsall Town Centre – A Place for Business

This chapter looks at the town centre's current economy and the existing office market, before considering new opportunities for office development and asking questions about the type and location of new office development. It also considers the current industrial premises in the centre and what should happen to these in the future.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. B:Q3	Comments
B:Q3	All of the options have advantages and disadvantages. However, from a CCG prospective the need for employment opportunities for the local population is crucial because of the links between employment and health. The new opportunities for office developments within the Walsall town centre area are to be welcomed.

6. Walsall Town Centre – A Place for Leisure

This chapter looks at the current leisure, cultural and community facilities in the town Centre. It asks crucial questions about the location for a cinema and around the

future of the Gala Baths. There are also some questions around maximising canalside locations in the town centre, the evening economy and the overnight accommodation offer.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. L:Q19	Comments
L: Q6	<p>This part of the document is also supported by the CCG. In particular ideas around improving current leisure, cultural and community facilities in the town centre are to be welcomed. The suggestion of a local cinema which is within the town centre which appears to near to existing Walsall art gallery is supported as is the continued future of the Gala baths. In relation to strengthening the links between the Gala baths and the arboretum we will suggest increasing the prominence of cycle and pedestrian pathways together with more signage advertising these two local facilities.</p>
L: Q25	<p>The CCG welcomes the focus on developing the town centre as a place for leisure because of the clear evidence that such facilities improve the health and wellbeing of the local people.</p>

7. Walsall Town Centre – A Place for Living

This chapter looks at the current housing provision within the town centre, and education, community and health facilities. It asks questions around the future need for such uses in the town centre and their possible locations. There are also questions around enhancing the character of the centre and the quality of buildings. There are some key questions around public space and environmental infrastructure.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. LV:Q3	Comments
LV:Q 24	The plans for additional housing residential provision within the Walsall town centre area are noted. The growth in residential population numbers will impact on health service infrastructure within the town centre. There are a number of GP surgeries and number of new households will result increased foot fall at local GP surgeries. The CCG will need to consider with NHS England implications of such growth in demand for these types of facilities.

8. Transport, Movement and Accessibility

This chapter looks at all aspects of movement into and around the town centre, including pedestrian movement, cycling, public transport, taxis and car parking. There are key questions around what streets could be pedestrianised, the location of a larger transport hub in the centre and the possibility of creating 'super carparks'.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. T:Q11	Comments

<p>T: Q 7, Q10 and Q14</p>	<p>The comments and the proposals that are set out are supported. We support options designed to improve public transport links eg rail and coach transport and that are aimed at minimising and /or reducing traffic congestion in or around the town centre and for better car parking.</p>
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9. Walsall Town Centre – A Place for Investment

This chapter asks questions around the approach of promoting the Big Three (St. Matthew's Quarter, Gigaport, and Waterfront) and Park Street as the key areas for development in the centre and what uses should be located in these areas. This chapter also includes the 'Key Decisions' map where we have identified the sites where we think there are important choices to be made. These are the issues where we really want your views as we think they hold the key to the future of Walsall Town Centre.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

<p>Question Number(s) e.g. INV:Q4</p>	<p>Comments</p>

INV: Q1 and Q2	The approach towards promoting St Matthews's court, Gigaport and waterfront and Park Street as the key areas for development in the centre is welcomed. Walsall needs to attract investment in order to create opportunities for employment for younger people and also for the adult population. There are strong links between employment opportunities and good health and how this impacts on health inequalities in the Borough.
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10. Walsall Town Centre – The Sites

This chapter is all about the sites that make up the opportunities in Walsall Town Centre. It includes a summary of where the sites have come from including an overview of the 'Call for Sites' process. It asks questions about whether we have considered all relevant sites and asks if you have any more information on the sites that we should take into consideration. The section finishes by looking at the constraints we need to consider when assessing site suitability.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. SI:Q2	Comments
	The CCG has no comments on the sites allocated.

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11. Securing and Delivering the AAP

This chapter looks at how the AAP will be delivered and what mechanism(s) we should explore to bring forwards these development opportunities. It asks you questions about delivery and phasing, and whether you know of any infrastructure requirements in the town centre.

What do you think? (please state all question numbers when answering any of the questions)

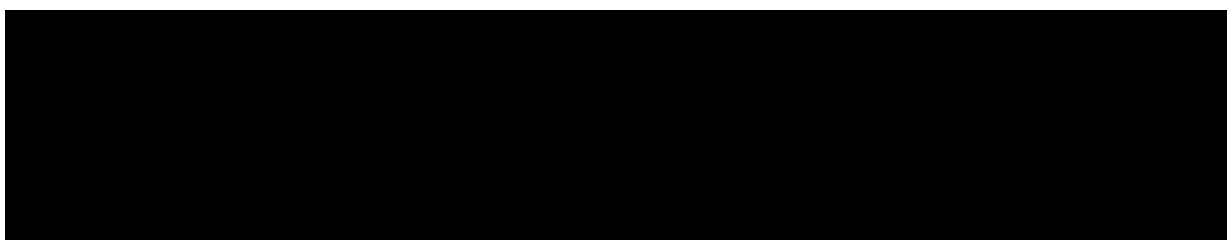
Question Number(s) e.g. D:Q3	Comments
	No Comments.

--	--

Any other comments...

Overall the CCG supports the Walsall town centre Area Action Plan a place for everyone to have your say. It is a visionary document containing a very good strategic direction in which to develop the town centre and provide a range of benefits, beneficial services and employment opportunities well into the future. This can only benefit the local population and as the part of the local Health and Wellbeing strategy will further improve opportunities for local people to have good health. It will also serve to reduce the variation in life expectancy that the Borough currently sees between east and west and also between men and women.

Residents & Individuals

Contact Details**First Name** Ben**Surname** Coleman**Organisation / Company Name** N/A**Email Address****Phone Number****Unique reference number**

(if you have received a letter or email about this consultation please state the unique reference number here)

Please place an X in the one box that best describes you / your role in completing this consultation:

Resident or Individual	X	Local Authority	
Business		Public service provider e.g. education establishment, health etc	
Developer or Investor		Public agency / organisation	
Landowner		Statutory Consultee	
Planning Agent or Consultant		Charity	
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation			

4. Walsall Town Centre – A Place for Shopping

This chapter asks you questions about the current shopping experience in Walsall and the existing retail offer. It also asks questions about the Primary Shopping Area and the locations for potential new retail development. Another key focus of this chapter is the future of Walsall Market and we ask for your view of the best location for a permanent home for the market.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. S:Q8	Comments
S:Q1	The shopping experience could be improved by linking Crown Wharf better with the shops on Park Street and up to where Primark will be, and improving the environment of this route.
S:Q2	I think Walsall would benefit from a greater range of shops including more shops selling products of higher value.

6. Walsall Town Centre – A Place for Leisure

This chapter looks at the current leisure, cultural and community facilities in the town Centre. It asks crucial questions about the location for a cinema and around the future of the Gala Baths. There are also some questions around maximising canalside locations in the town centre, the evening economy and the overnight accommodation offer.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. L:Q19	Comments
LQ:1	I agree with options 2, 3 or 4. I regularly use the Gala Baths and feel it would be a great loss to the town centre if it was closed down. However if continuing to run the Baths is too expensive I think the Council should look to invest in leisure facilities, including a swimming pool, elsewhere within the town centre.
LQ:2	I think the Council should provide a swimming pool, exercise classes and gym facilities in the town centre. Some of this is covered by private gyms but these are often expensive, and these gyms do not provide a swimming pool which I think is an important facility and very popular.
L:Q3	My decision is based primarily on location, as I live in Walsall town centre and would be highly unlikely to travel too far outside of the centre to use exercise and leisure facilities. My decision also depends on what facilities are on offer (as I prefer to swim or attend classes than use gym equipment) and whether the swimming/ exercise class timetable fits in around work.
L:Q12	More comedy and music acts, in pubs or other small venues, but also maybe we need a larger multi-purpose venue that could be used for theatre, music, comedy etc for attracting bigger acts.
LQ:16	Need more of a range of eating and drinking venues, and some nicer pubs/bars that don't just attract young people drinking excessively.
LQ:25	I think Walsall will benefit massively from having a cinema in the town centre, wherever it is located. However from the options given my preference would be around the canal as there is more space to create a really attractive environment. It would be great if the cinema could be joined by other leisure facilities eg, bowling, climbing wall, ice skating, restaurants etc.

7. Walsall Town Centre – A Place for Living

This chapter looks at the current housing provision within the town centre, and education, community and health facilities. It asks questions around the future need for such uses in the town centre and their possible locations. There are also questions around enhancing the character of the centre and the quality of buildings. There are some key questions around public space and environmental infrastructure.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. LV:Q3	Comments
LV:Q6	<p>In general I like living in the town centre but being so central we do get a lot of anti-social behaviour including young people loitering at the entrance to the building, making a lot of noise, smoking weed, and urinating. They leave mess and rubbish and can be intimidating. It seems to attract people who are looking for a place to hang out in the town centre, so I think more needs to be done to move them elsewhere or provide places for them to go.</p>
LV:Q18	<p>I think more should be done to protect and enhance the historic buildings in Walsall town centre, particularly protecting them from anti-social behaviour and arson, and encouraging their use rather than staying vacant.</p>

8. Transport, Movement and Accessibility

This chapter looks at all aspects of movement into and around the town centre, including pedestrian movement, cycling, public transport, taxis and car parking. There are key questions around what streets could be pedestrianised, the location of a larger transport hub in the centre and the possibility of creating 'super car parks'.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. T:Q11	Comments
T:Q7	<p>I think the railway station should be expanded to allow more trains per hour and routes to more locations within and outside of the region. I also think the station should be redesigned as this may be many people's first impression of Walsall and at the moment it is less than impressive.</p>

The idea of opening up the Walsall Town Centre Area Plan for public scrutiny and discussion is laudible. Where it falls down is that the documents which communicate the vision are pretty well incomprehensible to ordinary people. The maps don't even bother naming the town centre streets. Furthermore, it was only on picking up a library leaflet that I realised this was going on. I'm well educated but it's too detailed and difficult to understand. There will likely be minimal input but that doesn't people are uninterested.

Barry

TCB:Q1 Which of the above options do you agree with most, and why?

Option 1 - it more or less co-incides with my subjective view of the centre.

AV:Q2 Do you agree with the AAP objectives? If you disagree, why?

Agree.

S:Q1 What do you think of the current shopping experience in the town centre? What can be done to improve the experience?

It has come to lack the smaller specialist shops for which a journey to Birmingham or Wolverhampton is necessary. One supsects that rents and business rates play a part in this.

S:Q3 Should the AAP explore issues around the number of some uses in the town centre such as hot food take-away outlets or betting shops?

There comes a point where the drive to fill spaces leads to the dominance of low cost shops which then define the nature of the area.

S:Q8 Which of the above options do you agree with most?

Option 2.

S:Q10 Which option for the location do you agree with and why?

Option 2. The Bridge and Bradford Street location is unsatisfactory. It was proposed as a temporary location and acceptable as such. As to its long term future, the existence of 'out of centre' alternatives may mean it will not survive.

B:Q3 Which of the above options do you agree with most, and why?

Option 1 - though it is assumed that this is not exclusive to smaller developments within the area.

B:Q6 Which of the above options do you agree with most, and why?

Option 3 - but undue pressure to relocate viable existing businesses is most undesirable.

L:Q1 What should happen to Gala Baths if a refurbishment is not possible?

???????

L:Q6 How do you think the physical links between Walsall town centre and the Arboretum could be improved?

The five way light controlled junction outside the clocktower is not friendly to pedestrians: 1) it requires too many separate crossings, 2) the refuges are too small if there is a significant number of people with push chairs, 3) the drainage creates puddles where pedestrians cross.

L:Q8 Should the Council explore the potential of combining the Museum, Leather Museum and Local History Centre?

Exploration is fine, but the Leather Museum and Local History Centre are both widely regarded as being of exceptional quality, any changes to them should be approached with caution. It is critical

that the LHC retains direct access to archives by the public rather than the 'order in advance' system that pertained before its move to Essex Street, and the Leather Museum needs to retain its current connection to the trade by being housed in a former factory building. As usual parking is an issue for some people.

L:Q15 Which of the above options do you agree with most, and why?

Cautiously support Option 1, but some existing businesses operating successfully in their existing locations might suffer if excluded from the zones.

L:Q23 Which of the above options do you agree with most, and why?

Options 1 or 2. Option 2 added to allow some flexibility, but only after the Waterfront fully exploited.

L:Q24 What kind of commercial leisure facilities would you pay to use in Walsall town centre?

Would support cinema, bar/restaurant, theatre though much would depend on the nature of the offer.

LV:Q1 Which of the above options do you agree with most, and why?

Option 3 - the more people living in the central areas, the more civilised it is likely to become.

LV:Q13 Is there any further need for education and health facilities in the town centre?

The need is not for more facilities so much as facilities which allow ready access to public transport and cars, at least for those who require it.

LV:Q17 Which of the above options do you agree with most, and why?

Option 1 - the losses of historic buildings so far have been so great that little more can be tolerated which rules out Option 2 and 3.

LV:Q23 Do we need a policy to protect views such as the church and the art gallery? If yes which views and how?

Yes - at least the views from the Art Gallery and Church Hill.

LV:Q26 What level of design guidance should the AAP provide for new buildings within the Town Centre?

The current SPD is fine in theory, however it does not deliver much in practice.

LV:Q27 Are there any areas in the Town Centre that should have higher design requirements?

Why not all of it ?

T:Q1 Which of the above options do you agree with most, and why?

Option 3 preferred. Option 2 should be ruled out because Walsall's enforcement of such regulations is so poor as to make it laughable, for instance: traffic through the St Paul's bus station. Option 1 seems pointless in view of the apparently steady flow of people between Park Street and the Crown Wharf.

T:Q5 Which of the above options do you agree with most, and why?

Probably Option 2, but this cannot surely be separated from consideration of enhancing and moving the railway station as mentioned in the SAD document?

T:Q7 Which of the above options do you agree with most, and why?

Option 1 - preferred. Option 2 achieves nothing.

T:Q16 Does car parking play an essential role in your decision to travel into Walsall town centre? What changes are needed to car parking in your view?

Very rarely drive.

INV:Q1 Which of the above options do you agree with, and why?

Option 5 - offers the best long term option for improving the quality of the town, although, in the end the commercial pressures will presumably win.

INV:Q17+Q18 Which of the above options do you agree with most, and why?

I cannot see these as mutually exclusive options. Although it seems generally accepted that smaller units should be replaced with larger ones, I personally do not favour this as a user.

INV:Q21 Which of the above options do you agree with most, and why?

Option 3 - the current derelict state of the Littleton Street frontage is a poor advert.

INV:Q26 Which of the above options do you agree with most, and why?

Option 1.

INV:Q27 Which of the above options do you agree with most, and why?

Option 1 - for consistency with Waterfront.

INV:Q30 Which of the above options do you agree with most, and why?

Option 1 cautiously supported with the proviso that the scale and nature of any development does not destroy the look and feel of Park Street which contains quite a lot of architectural and historical interest.

3/6/2013

J. French

[REDACTED]

[REDACTED]

[REDACTED]

Brereton Michael

From: Blythe Charis
Sent: 29 July 2013 09:29
To: Brereton Michael
Subject: FW: Buchanan Road Field

Charis Blythe

Senior Planning Policy Officer
Planning and Building Control
Regeneration Directorate
Walsall Council
Civic Centre, Darwall Street, Walsall WS1 1DG
Email: blythec@Walsall.gov.uk
Tel: 01922 658023
Website: www.walsall.gov.uk

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From: Lisa Read [mailto:]
Sent: 29 July 2013 09:25
To: LDF@walsall.gov.uk
Subject: Fw: Buchanan Road Field

Hello

Please see attached sent originally to ldf@walsall.gov.uk as shown on original flyer issued by residents association, which I now find was a printing error. Please register us on your system.

Kind Regards

Mr Mrs P.L Read

----- Forwarded Message -----

From: Lisa Read [mailto:]
To: "ldf@walsall.gov.uk" <ldf@walsall.gov.uk>


Sent: Saturday, 27 July 2013, 14:57
Subject: Fw: Buchanan Road Field

Please see attached email which I sent on 2nd June, our neighbours have received a reply to the email that they sent, but we have not received any response. Please can you check you have included us.

Kind Regards

Mrs L Read


----- Forwarded Message -----

From: Lisa Read 
To: "idf@walsall.gov.uk" <idf@walsall.gov.uk>
Sent: Sunday, 2 June 2013, 20:05
Subject: Buchanan Road Field

Dear Sirs

We have heard that the field at the end of Buchanan Road is earmarked for housing.

If this is so we wish to object to this proposal.

The issue has been raised before and each time it has been pointed out that the drainage in the area is not sufficient. Also, the volume of traffic that more houses would bring onto the already congested roads into Walsall town centre each day. There is also the loss of wild life to the area as its adjacent to the park where many birds and maybe bats have there homes.

Buchanan Road itself is busy, as people park in the road when they want to use the park from the Buchanan Road entrance. Indeed the many events held in the park that attract people to the area along with the children's play area adjacent to the Buchanan Road entrance, all mean that people who come to the park via this entrance park in Buchanan Road.

The exit at the start of Buchanan Road merges with Argyle Road and Buchanan Avenue, is also busy to traffic. Cameron Road onto Argyle Road is already used as "rat run" for traffic coming up the Aldridge Road, trying to avoid the volume of traffic in Mellish Road, as people travel to and from work each day. The Mellish Road Island is always congested as well as its the main road into Walsall from this area.

At the top of Buchanan Avenue on both sides of the road, it is always busy with parked cars during the day, (apparently I am told these are council workers who clog up the side streets since the new housing building has been opened in Hatherton Street/Teddesley Street area)

To have even more traffic (if houses were built on the field) driving down Buchanan Road into Buchanan Avenue and continuing up Buchanan Avenue to the top to reach the Mellish Road island, would cause chaos on roads already busy with heavy traffic.

Therefore we would object to any proposal to use the Buchanan Road field for housing.

Yours sincerely

Mrs P Read

Mr Mrs P Read



Contact Details**First Name** Colin**Surname** Tsang**Organisation / Company Name****Address** [REDACTED]**Postcode** [REDACTED]**Email Address** [REDACTED]**Phone Number****Unique reference number**

(if you have received a letter or email about this consultation please state the unique reference number here)

Please place an X in the one box that best describes you / your role in responding to this consultation.

Resident or Individual	X	Local Authority	
Business		Public service provider e.g. education establishment, health etc	
Developer or Investor		Public agency / organisation	
Landowner		Statutory Consultee	
Planning Agent or Consultant		Charity	
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation			

3. Housing

This chapter explains how many sites we need to find for new homes, what mixture of house types we think we need and where these sites might be located.

**What do you think? Which options do you agree with most and why?
(Please state all question numbers when answering any of the questions or discussing the options)**

Question Number(s) e.g. HO:Q4	Comments
HO Q1	<p style="text-align: center;">Housing</p> <p>All the new housing building in Walsall are of poor design and using the cheapest material available.</p> <p>The property at Avonmore Court, Walsall, WS2 8AL. There are six apartment they have been empty since they were built. They have never been occupied. The apartment don't have any storage rooms and the rent for these are £425 per calendar month. There is black mould on the ceiling of the corridors, it smells awful. The fire alarm and fire alarm system has not been properly installed. The cheap double glazing is falling apart.</p> <p>There are no fewer than ten empty properties at Avonmore Court, Walsall, WS2 8AL.</p> <p>There are many empty properties at Waterfront Way, Walsall, WS2. You got to ask why are these properties empty for many years and why nobody wants to occupy them. They have little or no storage rooms and the rent or mortgage is unaffordable.</p> <p>Houses should be built to lasts for many centuries using good quality materials and should contain storage rooms. Houses in Harden Road, Pattison St, Attlee Road, Churchill Road are built with good quality material and the interior are good.</p>

5. Shopping and Services

This chapter looks at the key issues facing Walsall's shopping and services. It focuses on how the SAD can support and strengthen Walsall's centres. The chapter covers all centre uses, including retail, services, offices and leisure. It covers the current policy requirements, the different hierarchy of centres with a particular focus on local centres and looks at the issues around out-of-centre developments.

Walsall Town Centre is being considered through an Area Action Plan (AAP) that will be produced in parallel with the SAD. The District Centres will be addressed later by other plans. This SAD therefore focuses on town centre uses outside of these centres and seeks to provide policies that compliment concentrating investment in centres.

What do you think? Which options do you agree with most and why?
(Please state all question numbers when answering any of the questions or discussing the options)

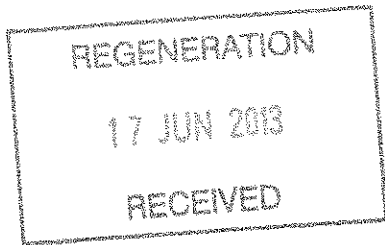
Question Number(s) e.g. SH:Q8	Comments
SH Q12	<p style="text-align: center;">The decline of Walsall is caused by the street parking charges on Ablewell St, Midland Rd, Stafford St, Bradford St, Newport St, Lower Hall Lane.</p> <p style="text-align: center;">Many small businesses are closing or losing a lot of trade due to this.</p> <p style="text-align: center;">There is a large number of vacant units in Walsall. Motorist are not prepared to pay for parking charges just to pop into a local shop. Parking charges are driving away customers and visitors to Walsall.</p>

6. Open Space, Leisure and Community Facilities

This chapter covers land and facilities that support the health, education and well-being of communities. It includes urban open space, sport and recreation centres, education, training and healthcare facilities, and other community facilities. Many of these uses, especially those that take place in buildings, will be located in the town, district and local centres, or other places with good public transport, cycle or pedestrian links to the communities they serve.

**What do you think? Which options do you agree with most and why?
(Please state all question numbers when answering any of the questions or discussing the options)**

Question Number(s) e.g. OS:Q2	Comments
CL Q2	<p>The leisure facilities at Walsall Gala Baths Tower St, Walsall, West Midlands WS1 1DH.</p> <p>This place has the worst changing rooms, showers facility I have ever experienced. The place is filthy. The changing rooms and showers needs to be modernised. The membership is expensive not worth the money you are paying for. The facilities at Walsall College, Wismore Campus, Littleton Street West, Walsall, WS2 8ES is miles better than the facilities at Walsall Gala Baths.</p> <p>The shower and changing rooms are hygienically clean and modern. The membership is value for money.</p>



Tel: [REDACTED]

15/6/13

MR J Williams ID:1874

Dear Mr. Smith,

Following our telephone conversation regarding the upgrade of Walsall Town Centre, my main concern is the Gala Baths. Myself & other neighbours use these facilities on a regular basis. I use the Gym and swimming pool on average twice a week. If this facility was moved from the town centre (i.e. closed down) we would have no easy access to other sites from this side of Walsall.

I would also add that we have no doctor or dentist in our area.

With regard to a cinema in Walsall, either site suggested would be good.

There is a large number of empty shops and offices just on the outskirts of Warsaw, could these not be converted into living accommodation, as I cannot see there being any future prospect of shop or office use.

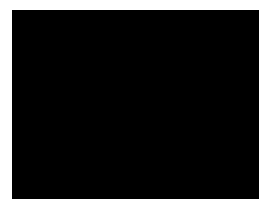
With regard to the position of the market, we see this as congestion in the town centre giving it a crowded and run-down appearance.

I would appreciate any response or information regarding these matters, by post as we have no access to the internet.

Yours faithfully



(MR)



Statutory Planning Consultees

Contact Details**First Name** Katherine**Surname** Burnett**Organisation / Company Name** Canal & River Trust**Address**

Peels Wharf
 Lichfield Street
 Fazeley
 Tamworth
 Staffs

Postcode

B78 3QZ

Email Address

Katherine.burnett@canalrivertrust.org.uk

Phone Number

07824 356538

Unique reference number

(if you have received a letter or email about this consultation please state the unique reference number here)

Please place an X in the one box that best describes you / your role in completing this consultation:

Resident or Individual	<input type="checkbox"/>	Local Authority	<input type="checkbox"/>
Business	<input type="checkbox"/>	Public service provider e.g. education establishment, health etc	<input type="checkbox"/>
Developer or Investor	<input type="checkbox"/>	Public agency / organisation	<input type="checkbox"/>

Landowner	X	Statutory Consultee	X
Planning Agent or Consultant		Charity	X
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation			

1. Introduction, 2. What is Walsall Town Centre? and

3. The Vision for Walsall Town Centre

The introduction sets out what the Area Action Plan is, the structure of the document and the planning context. It also explains about the Sustainability Appraisal of the plan, which you can also comment on. Chapter 2 gives an introduction to the context of Walsall town centre by looking at its location and role within the wider Borough. It also covers the key challenges which are facing the town centre. This chapter includes questions and options around the proposed boundary for the AAP for your consideration. The third chapter introduces the vision and objectives for the town centre before asking if this aligns with your aspirations for Walsall.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. TCB:Q1	Comments

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6. Walsall Town Centre – A Place for Leisure

This chapter looks at the current leisure, cultural and community facilities in the town Centre. It asks crucial questions about the location for a cinema and around the future of the Gala Baths. There are also some questions around maximising canalside locations in the town centre, the evening economy and the overnight accommodation offer.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. L:Q19	Comments
L: Q21 L: Q22	<p>The canal arm, towpaths and basin are identified as environmental assets. In the context of the Black Country Environmental Infrastructure Guidance, then the canals could be referred to as environmental infrastructure. However, it is important to highlight that the canal networks are multi-functional and should not be viewed purely as environmental infrastructure. Apart from their traditional role as a system of travel or transport they serve in a variety of roles, including: an agent of or catalyst for regeneration; a contributor to water supply and transfer, drainage and flood management; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape, open space and ecological resource; sustainable modes of transport; and routes for telecommunication.</p> <p>Promoting activity on the canal is welcomed and the developments which have already taken place at Walsall Waterfront are achieving that objective.</p> <p>L: Q21 Are any additional canal user facilities required to enhance the canal network? For example commercial and /or residential moorings.</p> <p>Focusing particularly on Walsall Basin, the site would be very suitable for a small number of static commercial vessels but not at the expense of visitor moorings. A small trip boat is always worth considering in any town centre where there is sufficient footfall. It is the sort of place where during the day the boat could offer both public and school trips and in the evening charter trips with food.</p>

	<p>L: Q22 How should canal-side developments be designed to enhance the canal network?</p> <p>The Canal & River Trust promotes key urban design principles that could underpin any area specific design policy for local environments within a waterway corridor. The urban design principles include ensuring where development is proposed adjacent to the waterway, development should be sited and orientated to face the waterway and should enhance the waterway's edge and define external waterside spaces. Create attractive mixed use waterfront development, integrate and utilise the waterspace and the towing path, create active edges to the waterspace. Respect the topography, relate to the waterspace and design to a human scale, improve access to and, where possible, the use of these waterways. Improve pedestrian and cycle access as well as public transport provision both within the development and from adjoining areas and improve the appearance of the site from the towing path and from the water at boat level and of the waterway corridor as a whole. Ensuring that development is attractive, sustainable, adaptable, sensitive, distinctive, innovative, connected, accessible and safe are applicable to the design of new development adjacent to the canal basin and canal arm within the AAP area.</p> <p>The Canal & River Trust welcome pre-application discussion on canalside development proposals and can provide specific advice on a range of issues including identifying whether there are aspects of the development proposal which could give rise to concerns; to identify whether there may be opportunities to enhance the sustainability of the proposal by use of the waterways, e.g. for heating and cooling utilising canal water, connectivity to the towing path as a sustainable transport route, the movement of building/demolition materials, to/from the site, by water during the construction phase; to highlight where applicants might require consent from Canal & River Trust as landowner to implement aspects of their development proposals, e.g. to discharge drainage to a waterway, to access the towing path, to oversail the waterway; to draw attention to the wide range of users of the waterways etc.</p>
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7. Walsall Town Centre – A Place for Living

This chapter looks at the current housing provision within the town centre, and education, community and health facilities. It asks questions around the future need for such uses in the town centre and their possible locations. There are also questions around enhancing the character of the centre and the quality of buildings. There are some key questions around public space and environmental infrastructure.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. LV:Q3	Comments
LV: Q37	<p>As previously discussed the canal networks are multi-functional and should not be viewed purely as environmental infrastructure.</p> <p>LV: Q37 What Environmental assets should be improved? How can such improvements be delivered?</p> <p>The canals can provide an attractive focus for development. The canals are attractive settings for development and are being utilised as vehicles in place making and place shaping.</p> <p>Canal & River Trust welcomes third party investment in the canal infrastructure. Where appropriate and in accordance with the tests, planning obligations secured from the development or regeneration of sites on the waterside or otherwise benefiting from it should be reinvested and framed positively to benefit the waterways infrastructure. For example for on-going maintenance costs for maintaining attractive 'waterway settings' use of the waterway and towing path as a form of open space, and the use of towing path as a sustainable transport route.</p>

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9. Walsall Town Centre – A Place for Investment

This chapter asks questions around the approach of promoting the Big Three (St. Matthew's Quarter, Gigaport, and Waterfront) and Park Street as the key areas for development in the centre and what uses should be located in these areas. This chapter also includes the 'Key Decisions' map where we have identified the sites where we think there are important choices to be made. These are the issues where we really want your views as we think they hold the key to the future of Walsall Town Centre.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. INV:Q4	Comments
INV: Q25 INV: Q26 INV: Q27	INV: Q25 Do you think that this area of public space should be a development opportunity, or retain its current use or even be protected as open space? Development opportunities adjacent to the canal will generate more usage of the towpaths and canal infrastructure contributing to sustainable communities.

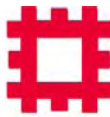
However, this will also lead to increased liabilities and maintenance issues such as increased wear and tear of the towpath and access points, litter and discharging of surface water into the network etc. In these instances the Council should look to prioritise securing contributions to improve the canal infrastructure and towpaths as part of development proposals and to mitigate any other issues that may arise from developments due to the extra liabilities and demands associated with waterside development. The Town Centre AAP promotes a number of sites adjacent to the canal for development. Therefore in these locations the canal infrastructure should be considered essential and prioritised in accordance with tests for planning obligations.

INV: Q26 Which of the above options do you agree with most and why?

Canal & River Trust would require any development at Waterfront North to; not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. The waterways can be used as tools in place making and place shaping, and contribute to the creation of sustainable communities. Canal & River Trust would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community.

INV: Q27 Which of the above options do you agree with most and why?

Canal & River Trust would require any development at Waterfront Lex to; not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential for being fully unlocked or discourage the use of the waterway network. The waterways can be used as tools in place making and place shaping, and contribute to the creation of sustainable communities. Canal & River Trust would seek for any development to relate appropriately to the waterway and optimise the benefits such a location can generate for all parts of the community.



ENGLISH HERITAGE

ID: 812

WEST MIDLANDS REGION

Mr D Elsworthy
Planning and Building Control
Regeneration Directorate
Walsall Council
Civic Centre
Darwall Street
Walsall WS1 1DG

Our ref: HD/P LDF
Your ref:
Telephone 0121 625 6851
Fax 0121 625 6820

3 June 2013

Dear Mr Elsworthy

re: WALSALL TOWN CENTRE AREA ACTION PLAN ISSUES AND OPTIONS REPORT

Thank you for your email inviting comments on the Town Centre Area Action Plan (AAP) Issues and Options Report.

In the view of the priority to submit comments to feed into the Council's internal reporting procedures, this response is given in outline to highlight any issues that may require further discussion and development through the plan-making process. The outline response is set out in the attached schedule.

At this stage our response focuses on those policy areas likely to be of most relevance to the conservation and enhancement of the town centre's historic environment and heritage assets. However, there may be additional matters and site specific issues that become relevant as the plan-making process proceeds.

In this context, and in support of our Duty to Cooperate, I would be happy to coordinate a meeting with the Council to follow-up our comments and recommendations in more detail.

Yours sincerely

Amanda Smith
Historic Environment Planning Adviser
E-mail: amanda.smith@english-heritage.org.uk



8TH FLOOR, THE AXIS, 10 HOLLIDAY STREET, BIRMINGHAM B1 1TG

Telephone 0121 625 6820 Facsimile 0121 625 6821

www.english-heritage.org.uk

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Correspondence or information which you send us may therefore become publicly available

Walsall Town Centre Area Action Plan Issues and Options Report: Schedule of Outline Comments – English Heritage

Matter / Question/ Policy	Comment	Recommendation
<p>Evidence Base INT Q2</p>	<p>English Heritage welcomes the preparation of the AAP and the opportunity it provides to develop an integrated strategy to guide its development and regeneration.</p> <p>English Heritage believes that the conservation and enhancement of the town centre’s historic environment and heritage assets should be a central part of the strategy for the town centre as well as inform decision-making on the options for development, including its likely level, scale, location and design.</p> <p>The NPPF is clear that the protection and enhancement of the historic environment is a key dimension of sustainable development (NPPF 7). It is further emphasised that to achieve sustainable development economic, social and environmental gains should be sought jointly and simultaneously (NPPF 8). The NPPF also requires that local plans should include a clear and positive strategy for the conservation and enjoyment of the historic environment in their area, including heritage assets most at risk through neglect, decay or other threats, (NPPF 126). Furthermore local plans are required to contain a strategy for the enhancement of the historic environment as well as seeking positive improvements in its quality as an integral part of sustainable development (NPPF 9 and 157).</p> <p>In this context the AAP should be informed by an adequate, up-to-</p>	<p>It should be clearly demonstrated that an adequate, up-to-date and relevant evidence base on the historic environment and heritage assets has been used to inform the AAP in accordance with the requirements of the NPPF (158, 169,170).</p> <p>English Heritage believes a historic characterisation study should be undertaken which builds on the Black Country Historic Landscape Characterisation. We would be happy to advise further on this and its scope as informed by practice elsewhere in the Black Country.</p>

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Matter / Question/ Policy	Comment	Recommendation
	<p>date and relevant evidence base on the area's historic environment and heritage assets in accordance with the requirements of the NPPF (158, 169,170). For the AAP English Heritage believes an effective approach for this would be to undertake a historic characterisation study of the plan area. Similar studies carried out in neighbouring boroughs such as Dudley and Wolverhampton have been successfully completed and used to inform the strategy, policy and site allocations of other AAPs. The studies also provide a valuable framework for identifying and targeting regeneration and investment priorities and hence can inform the implementation and delivery of the plan. Examples of how historic characterisation can inform local planning are described in Understanding Place: Character and Context in Local Planning:</p> <p>http://www.english-heritage.org.uk/publications/understanding-place-character-context-local-planning/</p> <p>In the absence of an appropriate level of historic characterisation, we do feel in a position to be able to answer in detail many of the site specific consultation questions. However, we believe that a historic characterisation study could positively inform a number of the outlined options, including:</p> <ul style="list-style-type: none"> i) The town centre boundary (TBC Q1-2) ii) The extent of the primary shopping area (S Q4-5) iii) the location of new retail development (S Q8-9) iv) locations for the Walsall Market or factory outlet (S Q10; Q14) 	

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Matter / Question/ Policy	Comment	Recommendation
	v) the location of new office development (B Q3-5) vi) the options for the future uses of industrial areas (B Q 6-7) vii) identifying improved linkages between places (e.g. Walsall Arboretum L Q6) and the cultural and leisure offer of the town centre viii) the design of canal-side development ix) the location of new housing (LV Q3) x) the approach to the development opportunities within the existing areas of St Matthew's Quarter, Gigaport, Waterfront (Chapter 9) xi) targeting public realm improvements (LV Q29, Q30, Q33) xii) identifying and targeting investment for environmental infrastructure/networks (LV Q36-38) xiii) design criteria for new development (LV Q25, 26)	
Vision	English Heritage welcomes the reference to the town centre's heritage as part of the vision.	
Objectives AV Q2-3	English Heritage disagrees with the scope of Objective 8 and its coverage of both heritage and design matters. Two separate objectives should be developed. In particular we believe a specific objective should be included on the conservation and enhancement of the town centre's historic environment and heritage assets in conjunction with its contribution to local character and distinctive.	Include separate objectives on the historic environment and design matters.
Cultural and Community Facilities	English Heritage needs to further consider the potential	

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Correspondence or information which you send us may therefore become publicly available

Matter / Question/ Policy	Comment	Recommendation
L Q8	implications of the options before providing a response. We are keen to ensure that the cultural offer of the town centre is sustained and where possible enhanced.	
The Canal Arm L Q20	The canal network is part of the heritage resource of the Borough and a heritage asset and delivers wider benefits for leisure, recreation and sustainable transport objectives. Conserving and enhancing its significance, including its historic character should hence be a key consideration. To this end option 1 is preferable.	
Residential Environments LV Q1	English Heritage is supportive of option 3 in the context of supporting the use of flats over shops since this can help support the maintenance and secure the sustainable use of a historic building.	
The Character of Walsall Town Centre LV Q17 and LV Q18 and LV Q19	<p>English Heritage believes that the conservation and enhancement of the town centre's historic environment and heritage assets should be a central part of the strategy for the town centre as well as inform decision-making on the options for development, including its likely level, scale, location and design.</p> <p>In our response to INT Q2 English Heritage we outline the need for the AAP to be informed by an adequate, up-to-date and relevant evidence base on the area's historic environment and heritage assets in accordance with the requirements of the NPPF (158, 169,170). For the AAP English Heritage believes an effective approach for this would be to undertake a historic characterisation study of the plan area. Similar studies carried out in neighbouring boroughs such as Dudley and Wolverhampton have been successfully completed and used to inform the strategy, policy and</p>	<p>English Heritage believes a historic characterisation study should be undertaken which builds on the Black Country Historic Landscape Characterisation. This would help inform how the historic character and assets of the town centre can be conserved and enhanced whilst also contributing to wider economic regeneration objectives.</p> <p>We would be happy to advise further on this and its scope as informed by practice elsewhere in the Black Country.</p>

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Matter / Question/ Policy	Comment	Recommendation
	<p>site allocations of other AAPs. The studies also provide a valuable framework for identifying and targeting regeneration and investment priorities and hence can inform the implementation and delivery of the plan. We also highlight how the results of a study could positively inform other policy and development options set out in the document.</p> <p>As currently presented and explained we do not fully agree with any of the proposed options. We consider the supporting statements on the potential implications of the options are somewhat negative in their analysis. We firmly believe an appropriate level of characterisation of the town centre would help inform decisions to secure sustainable development, this including the conservation and enhancement of the area's heritage assets including its historic character.</p>	
<p>Conservation Areas and Listed Buildings LV 20</p>	<p>English Heritage is supportive of Option 2 and the opportunity for policies to address local issues as well as opportunities for enhancing the significance of the town centre's conservation areas, including the contribute made by their setting (NPPF 137).</p> <p>We are also supportive of Option 4, indeed a detailed historic characterisation can help to engage local communities improving their awareness and understanding of the historic environment as well as providing a framework for better understanding what is valued by local people and why.</p>	

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	<p>With regard to Option 1 English Heritage endorses the importance of an up-to-date evidence base, this including conservation area appraisals and management plans. Local authorities also have a statutory duty to determine whether they should designate new conservation areas or extend existing ones. Hence any proposed review should be undertaken in support of a positive strategy for the conservation and enjoyment of the Borough's historic environment and heritage assets.</p> <p>We are concerned at the potential implications of Option 3 with regard to the conservation and enhancement of the town centre's local list heritage assets.</p>	
<p>Conservation Areas and Listed Buildings LV Q 21 and LV Q22</p>	<p>A historic characterisation study would provide an effective and robust basis for helping to identify buildings which positively contribute to the character of the town centre and which may warrant national designation.</p>	
<p>Protected Views LV Q23 and LV Q 24</p>	<p>A historic characterisation study would provide an effective and robust basis for identifying and protecting important views which positively contribute to the character, quality and experience of the town centre.</p>	
<p>Sites SI Q3 and SI Q6</p>	<p>The overview in Chapter 10 on the town centre sites does not include any reference to taking into account potential implications for heritage assets, including their setting. This fails to conform to the NPPF (e.g. 169, 157 and 7th point).</p> <p>English Heritage requires clarification on the evidence base on the</p>	<p>It should be clearly demonstrated that an adequate, up-to-date and relevant evidence base on the historic environment and heritage assets has been used to inform the initial assessments and the selection of sites in accordance with the</p>

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Matter / Question/ Policy	Comment	Recommendation
	historic environment and heritage used to inform the site selection process. This includes the potential for archaeological interest (NPPF 169,128).	requirements of the NPPF. English Heritage recommends the undertaking of a historic characterisation study as part of the evidence base.

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Mr David Elsworthy
 Walsall Metropolitan Borough Council
 Regeneration Strategy
 The Civic Centre Darwall Street
 Walsall
 West Midlands
 WS1 1DG

Our ref: UT/2006/000279/SL-
 01/IS1-L01
Your ref: 1261
Date: 03 June 2013

Dear Mr Elsworthy

WALSALL TOWN CENTRE AREA ACTION PLAN

ISSUES AND OPTIONS REPORT

Thank you for consulting the Environment Agency regarding the Walsall Town Centre Area Action Plan which we received on 19 April 2013.

We have the following comments to make in relation to the Environment Agency remit within the planning system.

Environmental Infrastructure

AV: Q2 Do you agree with the AAP objectives? If you disagree, why?

We strongly support the inclusion of AAP objective 9 *'promote the sustainability of the centre by delivering environmental infrastructure and improvements that will deliver a range of benefits,'*

The town centre is vulnerable to surface water flooding, fluvial flooding from the largely culverted Ford Brook and the urban heat island effect due to the lack of existing green infrastructure provision.

The adopted Black Country Core Strategy Policy ENV5 does include measures to help to mitigate some of these problems; however it may be helpful to consider the inclusion of specific guidance to support Developers in delivering this policy within new town centre developments.

There have been some excellent examples of sustainable development and the incorporation of green infrastructure including the Jessop's housing development at Walsall Waterfront which incorporates a range of sustainable technologies and SuDS including green roofs on dwellings and even garden sheds.

Not only has this provided significant benefits to new residents of the development, but it has created green stepping stones from biodiversity and helped to reduce the urban heat island effect, and contributed towards the reduction of flood risk.

We would strongly support new development that include some of these features within the Town centre to help to increase stepping stone habitats to provide an ecological link / wildlife corridor from the Arboretum and the canal arm to the wider area.

LV: Q25 which of the above options do you agree with and why?

We prefer design option 3, 'The AAP seeks exemplar design standards for new buildings in predominant locations to set precedence for the town centre'.

We believe that promoting high quality design that supports sustainable development in line with BCCS policies including ENV5 would help to enhance the character, environment, and image of the town centre. New developments that include green infrastructure such as green roofs and rainwater harvesting provide a range of benefits including reducing the urban heat island effect and reduced running costs for the occupants.

The UK's Climate Projections (UKCP09) shows that this region is likely to experience hotter drier summers, warmer wetter winters and rising sea levels. This is likely to have a significant effect on environmental conditions and will increase the impact of human activity on the water environment. It is essential that the actions in this plan take account of the likely effects of climate change. What is done now must not make it harder to deal with problems in the future, even if this does require some planning applications that would fail to meet sustainability objectives to be refused planning permission.

LV: Q36 Which of the above options do you agree with most, and why?

We prefer Environmental Option 1 'The AAP highlights existing environmental assets where improvements will be sought' We support the creation of wildlife corridors and offering opportunities for climate change mitigation and adaptation.

Establishing a coherent and resilient ecological network will help wildlife cope with challenges faced now and in the future. A larger, more effective ecological network can also help society cope with climate change e.g. by restoring hydrological processes or providing green spaces in urban areas to reduce the heat-island effect.

In order to halt wildlife decline and to sustain robust populations within the borough, sites need to be connected and allow for the movement of individuals between areas. The only way to achieve sufficient ecological connections is through a more strategic approach. This will allow the targeting of resources which should lead to more conducive environmental gains.

The approach should look to follow the recommendations in the 2010 'Making Space for Nature' by:

- Improving the quality of current sites by better habitat management
- Increasing the size of current wildlife sites
- Enhancing connections between, or joining up, sites either through physical corridors or 'stepping stones'
- Creating new sites
- Reducing the pressures on wildlife by improving the wider environment including through buffering wildlife sites.

We actively encourage the use of SuDS at new developments; however where land

may be previous contaminated, proposals for the drainage of surface or roof water into the ground will need to take into account the findings of the Preliminary Risk Assessment and any subsequent site investigation. If contamination is present and surface water is to be drained to ground then the contamination risk assessment will need to consider the additional infiltration from the surface and roof water system(s).

Flood Risk

SI: Q5 Which of the above options do you agree with most and why?

We prefer FRM option 1 'The AAP takes a strategic approach to integrating water management infrastructure, such as Sustainable Drainage Systems, into the design of the public realm in the Town Centre.

Some areas of the Town centre are located within Flood Zone 2 in line with our flood risk model for the Ford Brook. We have more recently published a map for surface water flooding which indicates where surface water flooding may occur and it identifies potential overland surface water flow routes. We welcome the review of this information and the updating of the strategic flood risk assessment to allow a detailed understanding of flood risk to be determined and for a number of recommendations for Developers to consider when designing new buildings.

From our previous involvement with planning applications for sites located within Flood Zone 2, there have been complications in designing building that are both flood resilient but also offer street level easy access for pedestrians. Developers seek to avoid the creation of a step or ramp as it may pose difficulties when people with disabilities wish to access a store. This is contrary to our flood risk standing advice that recommends the raising of finished floor levels to protect properties from shallow flood water inundating new buildings.

By working closely with Developers we have been able to make site specific recommendations such as the creation of a flood warning system and the use of demountable defenses such as flood boards to prevent the ingress of water into buildings.

Once the updated SFRA is close to completion we would welcome the opportunity to work with your Lead Local Flood Authority to develop some helpful guidance to Developers to ensure that new developments are flood resilient. This may have additional benefits to occupiers of these building by reducing insurance premiums and ensuring that shop fixtures and fittings and that stock or equipment is not damaged.

We hope that you find our comments helpful in the preparation of the preferred choices document.

We are keen to work in co-operation with your Authority to support your development of strategic documents, and assist with the development of documents including the revised Strategic Flood Risk Assessment and Developer guidance to ensure the delivery of sustainable development.

Yours sincerely

Mrs Becky Clarke
Sustainable Places Technical Advisor

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Contact Details**First Name** Gerald**Surname** Kells**Organisation / Company Name** Walsall Friends of the Earth**Address** 55 Follyhouse Lane, Walsall**Postcode** WS1 3EL**Email Address** gerald.kells@talk21.com**Phone Number** 01922 636601**Unique reference number**

(if you have received a letter or email about this consultation please state the unique reference number here)

Please place an X in the one box that best describes you / your role in completing this consultation:

Resident or Individual		Local Authority	
Business		Public service provider e.g. education establishment, health etc	
Developer or Investor		Public agency / organisation	
Landowner		Statutory Consultee	
Planning Agent or Consultant		Charity	
Land & Property Agent or Surveyor		Other (please specify in space below)	
Community or other Organisation	X		

1. Introduction, 2. What is Walsall Town Centre? and 3. The Vision for Walsall Town Centre

The introduction sets out what the Area Action Plan is, the structure of the document and the planning context. It also explains about the Sustainability Appraisal of the plan, which you can also comment on. Chapter 2 gives an introduction to the context of Walsall town centre by looking at its location and role within the wider Borough. It also covers the key challenges which are facing the town centre. This chapter includes questions and options around the proposed boundary for the AAP for your consideration. The third chapter introduces the vision and objectives for the town centre before asking if this aligns with your aspirations for Walsall.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. TCB:Q1	Comments
	<p>TCB Q1: We believe the boundary is about right. The current boundary allows reasonable development to come forward without creating a dispersed town centre which could lead to increased use of the car. However, we are concerned about the potential for hollowing out of the central retail area and believe it is important that development within the town centre is appropriately zoned to ensure that does not happen.</p> <p>AV Q2: We agree with the objectives with the caveat in response to AV Q3.</p> <p>AV Q3: We would like to see specific emphasis placed on enhancing the links along the canal network and out to the Arboretum, as part of the overall walking and cycling strategy. We remain concerned about the impact of major road barriers, particularly the new ring road and the arboretum island, on walking patterns.</p>

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4. Walsall Town Centre – A Place for Shopping

This chapter asks you questions about the current shopping experience in Walsall and the existing retail offer. It also asks questions about the Primary Shopping Area and the locations for potential new retail development. Another key focus of this chapter is the future of Walsall Market and we ask for your view of the best location for a permanent home for the market.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. S:Q8	Comments
	<p>S Q1: We are concerned about the vacant shops in the town centre, particularly among smaller independent retailers. The council and other leaseholders should consider how this might be addressed, but it is also important that approvals on the edge of the centre take account of their impact on the core.</p> <p>S Q2: We would like to see a good variety of shops. There also need to be higher end shops. This will best be achieved if other complimentary policies, such as building new aspirational housing in the town centre, are used to improve the social mix.</p> <p>S Q3: We are concerned about the proliferation of some uses, such as fast food takeaways.</p>

S Q4/Q5: We do not think the primary shopping area should be changed given the current amount of vacancies. There are already large units round the edge, such as Crown Wharf, which provide a variety of retail experiences. We do want to see key anchor sites such as the old Tesco's redeveloped.

S Q6: Releasing sites for retail beyond the primary shopping area should not be considered. None of the additions being suggested appear well linked to the PSA so are likely to increase car use and undermine the centre itself.

S Q7: We cannot at this stage suggest specific reasons to restrict other uses in the primary shopping area. We would welcome more conversion of upper stories for other use such as office or domestic.

S Q8: We would support an appropriate mix of Options 1 and 2 but not Option 3.

S Q13: If the Market is located on the Bridge it is important that the Bridge's character is retained, including the public art and trees. Consideration should be given to increased public space if there is redevelopment of the current market square but this should not be at the expense of the focal point of the Bridge.

S Q14: A factory outlet centre was considered on the Shannon Mill site. This would seem to us an appropriate use provided it could be shown to support other retail in the core of the town centre not undermine it.

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5. Walsall Town Centre – A Place for Business

This chapter looks at the town centre's current economy and the existing office market, before considering new opportunities for office development and asking questions about the type and location of new office development. It also considers the current industrial premises in the centre and what should happen to these in the future.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. B:Q3	Comments
	<p>B Q1: We would like to see a mix of high quality new office development and also small units available for local businesses, including above shops.</p> <p>B Q2: Provide high quality locations and link to rail links to Birmingham.</p> <p>B Q3: The gigaport is a good selling point, especially linked to the college, but we also believe sites close to the railway should be prioritised. The locations near the Arboretum Island should be less of a priority.</p> <p>B Q6: The current industrial sites are not necessarily well located. We would support a mix of Options 2 and 3, allowing new uses when that is appropriate but also attracting research and development. Some sites have value for their industrial heritage. Walsall has lost several important heritage buildings in recent years so the value of remaining buildings has increased and this should be taken into account in redeveloping industrial areas so the best examples can be protected.</p> <p>B Q12: We agree that social enterprise should be encouraged. Consideration of special rates for rent would be one way.</p>

	<p>B Q13: Live-work units can reduce commuting and would help to diversify the social mix of the town centre. Developers should be encouraged to incorporate them in new developments.</p>
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6. Walsall Town Centre – A Place for Leisure

This chapter looks at the current leisure, cultural and community facilities in the town Centre. It asks crucial questions about the location for a cinema and around the future of the Gala Baths. There are also some questions around maximising canalside locations in the town centre, the evening economy and the overnight accommodation offer.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. L:Q19	Comments
	<p>L Q1: We are not in a position to comment on the viability of the Gala Baths. However we believe it is important to provide such a leisure facility in the town centre where it is accessible by public transport and would like to see this achieved.</p> <p>L Q6: The Arboretum links could be improved by investment in the pavements and pedestrian realm as well as consideration of whether road space can be reallocated. The Arboretum junction is a major barrier. Reducing the number of pedestrian crossings required to get over it would help but that is difficult without returning it to the previous roundabout.</p> <p>L Q7: Improving the quality of the retail offer between the Arboretum and the town would help. Providing good quality restaurants on that road would also encourage joint use.</p> <p>L Q8: We would support using the leather centre as a joint heritage and museum centre.</p> <p>L Q11: There is clearly an opportunity for a performance venue in Walsall. Wolverhampton benefits significantly from its venues, including the theatre attached to the University. Previous attempts in Walsall, notably the Garage, foundered so there would need to be serious consideration of how such a venue would work in practice, perhaps linking it to the college.</p> <p>L Q15: The night time economy of Walsall is currently dominated by pubs and nightclubs catering for young drinkers. More variety of restaurants and a higher quality would help but this needs to be allied with other attractions such as Cinema, Theatre and Music spaces.</p> <p>L Q18: Additional hotel accommodation near the railway would be welcome.</p> <p>L Q22: Canalside developments need to enhance the attractiveness of the canal as well as preserving historic elements. Additional moorings may help if they can be achieved. All development on the canal should be in keeping with the canal's setting. Opportunities to enhance the towpaths and make them feel safe should also be pursued so the towpaths are seen as natural routes, for example to the hospital.</p> <p>L Q23: The canalside is the obvious location for leisure developments and should be prioritised.</p>

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7. Walsall Town Centre – A Place for Living

This chapter looks at the current housing provision within the town centre, and education, community and health facilities. It asks questions around the future need for such uses in the town centre and their possible locations. There are also questions around enhancing the character of the centre and the quality of buildings. There are some key questions around public space and environmental infrastructure.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. LV:Q3	Comments
	<p>LV Q1: We would support a mixture of Options 2 and 3, creating more homes above shops and more mixed used development. Development solely for housing may be appropriate on some locations but needs to be weighed against other town centre uses. There should be particular emphasis on providing town centre housing which increases the social mix, particularly aspirational housing close to the railway station.</p> <p>LVQ5/Q6: We support Option 1. If we are to attract people to live in the town centre we need to create safe and attractive environments. Any extra cost is justified.</p> <p>LVQ7: Car parking for residents in the town centre should not necessarily be as high as elsewhere. Some residents will choose not to have a car. Communal parking may be more appropriate than</p>

<p>individual garages which may be under-utilised.</p> <p>LV Q8: Greater links to housing around the town centre by cycle and walking should be encouraged. It is important that this is taken into consideration in new developments. For example, the layout of Crown Wharf was changed to ensure pedestrian access was maintained. This approach should be taken on future sites. This will include looking at crossings and desire lines and may need to include improving signing.</p> <p>LV Q11: Links to the hospital from the town could be improved by better signing and improvements along the canal path as well as improvements where the canal path joins the road network.</p> <p>LV Q17: We support Options 1 and 3, but not 2. The town has lost a lot of historic buildings recently and in the sixties and seventies. The remaining heritage buildings play a key role in keeping Walsall attractive. There are large development opportunities, such as the old Shannon Mill site, so we do not see why further heritage buildings need to be lost. However, we also think it is important that the four quarters are strengthened and their character enhanced.</p> <p>LV Q18: The heritage of Walsall is vital and it is essential that we ensure it is protected.</p> <p>LV Q19: There is little architectural merit in most of the post war development of Walsall.</p> <p>LV Q20: We support Options 2 and 4. Option 1 seems to only consider reducing the conservation areas. This would be a retrograde step given the importance of heritage to make Walsall an attractive centre. There may be a case for reviewing whether the conservation areas should be widened, for example to include Station Street and Stafford Street as far as the Ring Road. In terms of grading this implies protection will be reduced for some buildings. We would not oppose strengthening protection for specific buildings which are not currently listed, but do not see any basis for reducing protection.</p> <p>LV Q22: In terms of listing, the Arboretum Clock Tower should certainly be considered because of its iconic location and relation to the newly renovated park.</p> <p>LV Q23: The AAP should include protected views. Given the history of the Overstrand and its impact on the town it is clearly not desirable to repeat that mistake.</p> <p>LV Q25: We support Options 2, 3, 5 and 6. High design standards will ensure an attractive town centre and should mean current developments will still be attractive in years to come. This should include high standards of renewable energy and also insulation. Large retail units have a particularly poor record in terms of energy</p>
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consumption so this is a key area to tackle. We would support renewable energy projects. Combined heat and power, in particular, can drastically reduce energy use and we would welcome such a proposal in the town centre if a site can be found. The AAP would also need to consider how it ensured developers linked their sites to the CHP unit and give guidance in terms of the infrastructure needed to support a CHP unit, such as piping, and how that would be delivered across the town centre. There may be opportunities to take advantage of development through S106 agreements or CIL. There is an obvious benefit in linking work to routine highway maintenance. New developments should also be required to consider linking to any CHP network as a first option.

LV Q29: We support Option 1. The AAP should identify public realm for improvement. A clear candidate would be the current Market Square. We have no specifically identified areas of public realm we would like to see added.

LV Q31: We agree that a Business Improvement District to support Public Realm improvement would be desirable. However, the charge would need to take account of the current economic situation.

LV Q32: The pedestrian links within the town are better than those on the edge. More effort should be made to improve and prioritise access routes into the town centre. Ensuring surfaces are safe and wheelchair friendly should also be prioritised.

LV Q33: Decluttering Park Street has made it easier to use. However, it is important that adequate planting, seating and public art are maintained.

LV Q34: Demolition of the Poundland Store could improve the town centre and provide a public realm site, perhaps with some art work to maintain the historic link to the old theatre. We do not agree that the other historic buildings in that area should be removed. Removing traffic from the road between Park Street and Crown Wharf would be more effective. If that is not possible the Council could pursue a scheme where the road is changed to dual use and traffic is given less priority. This has been successfully (and safely) achieved in other centres, notably parts of Coventry.

LV Q36/Q37: We support Option 1 which highlights environmental assets and seeks to protect and enhance them. We would like to see an increase in appropriate trees which have steadily declined in the centre.

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8. Transport, Movement and Accessibility

This chapter looks at all aspects of movement into and around the town centre, including pedestrian movement, cycling, public transport, taxis and car parking. There are key questions around what streets could be pedestrianised, the location of a larger transport hub in the centre and the possibility of creating 'super car parks'.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. T:Q11	Comments
	T Q1: We support Option 1 (see LV Q34) which involves pedestrianisation between Park Street and Crown Wharf but not the loss of historic buildings in that area. We do not support Option 2 which would bring buses onto the Bridge and Park Street. We do not support Option 3.

T Q2: Improved signage is important and improved footways which are wheelchair friendly. As well as at Crown Wharf (see LV Q34) there may be other opportunities to deprioritise traffic on streets and replace tarmac with joint use surfaces. There may also be a case for further restricting vehicular access into the central area, including in the evening. If the Market Square and the area around Asda is to be improved consideration needs to be given to removal of cars.

T Q5: We support Options 3 and 4. The current arrangement for Public Transport serves the town well. We understand the aspiration for a single Public Transport hub but that is not practicable. The idea that buses would use the Bridge would be a retrograde step. It would also, almost certainly, open the route up to cars as bus lanes are routinely misused in the town centre as it is with little policing. Expanding the St Paul's bus station would have implications for the surrounding area as well as losing an iconic structure. The Bradford Place arrangement is less than perfect and expansion into the Jerome Retail Park is an option that should be considered.

T Q6: The poor policing of bus lanes is an issue and consideration needs to be given as to how they can be practically enforced.

T Q7: The expansion of the railway station should be supported in the AAP. There remain aspirations for services to Wolverhampton, Lichfield, Aldridge and Dudley/Stourbridge. These would help improve Walsall's position as well as the wider Black Country. Providing additional platform space at Walsall could help deliver this. There is also a desperate need for improvements to the car-park and other elements between the station and Station Street.

T Q12: We support Option 1 and Option 2. The Council should encourage bus companies to use cleaner vehicles and increasing air quality standards is one way to achieve that.

T Q14: We support Option 2. The council should set a consistent approach to car parking charges and should ensure the regime at any new car parking is consistent with that. In particular it is important that people using car parks visit the whole centre not just the adjacent retail unit and that people don't use more than one car park for each trip.

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9. Walsall Town Centre – A Place for Investment

This chapter asks questions around the approach of promoting the Big Three (St. Matthew's Quarter, Gigaport, and Waterfront) and Park Street as the key areas for development in the centre and what uses should be located in these areas. This chapter also includes the 'Key Decisions' map where we have identified the sites where we think there are important choices to be made. These are the issues where we really want your views as we think they hold the key to the future of Walsall Town Centre.

What do you think? Which options do you agree with most and why? (please state all question numbers when answering any of the questions or discussing the options)

Question Number(s) e.g. INV:Q4	Comments
	INV Q1: We support Options 4 and 5. High quality design and environmental standards are needed at key sites.

Date: 3rd June 2013
Our ref: 84683

ID: 1781



By e-mail: LDF@walsall.gov.uk

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Consultation Service
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CREWE
CW1 6GJ

T: 0300 060 4276

Dear Mr Elsworthy

Consultation on Walsall Town Centre Area Action Plan and Site Allocation Document (Issues and Options)

Thank you for consulting us on the above which was received by Natural England on 22 April 2013.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Vision

We suggest the proposed Vision includes reference to the natural environment, particularly protection and enhancement of biodiversity and the requirement for development which responds robustly to climate change, includes sustainable transport and improves access for everyone to services including local open space and green infrastructure (GI).

Overall, Natural England considers that the Walsall Issues and Options Paper lacks detail on the natural environment and would like to see the following key environmental areas covered: the natural environment, the urban environment, environmental protection and climate change with a variety of development management policies proposed. Protecting and enhancing natural resources is a key challenge of delivering the growth required to meet the needs of communities, business and infrastructure.

Site Allocations

We have no specific comments to make on individual sites, nor is it appropriate for us to suggest sites for future development. We would, however, request full consideration of the natural environment in the process of selecting and assessing sites for allocation through the Local Plan.

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Foundry House
3 Millsands
Riverside Exchange
Sheffield S3 8NH

www.naturalengland.org.uk

Aspects of the natural environment to consider include biodiversity; geodiversity; landscape character and quality; green infrastructure; access to the countryside and other open space and the protection and enhancement of soils.

Natural England considers that there are a number of environmental designations and issues which may affect the size, scale, form and delivery of housing sites and should be taken into account. Although the list below is not exhaustive, key environmental considerations include:

- International and national nature conservation sites, including Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites, SSSIs, National Nature Reserves.
- Designated landscapes (National Parks, Areas of Outstanding Natural Beauty and Heritage Coasts).
- Locally and regionally designated sites for geodiversity and biodiversity.
- UK BAP habitats and significant proportions of BAP or protected species.
- Ancient woodland.
- Landscape character

Further detailed comments on key themes to assist the Local Authority in site selection are provided below. This information may also be of assistance in the development of policies and options to be delivered through the Local Plan:

Landscape

The Local Authority should take landscape character into account when allocating sites for development. Particular consideration should be given to impacts on designated landscapes (National Parks, Areas of Outstanding Natural Beauty (AONB), Heritage Coasts) and NPPF policies should be adhered to. Impacts on National Trails should also be considered.

A landscape character approach should be used to underpin and guide decisions on all development and set out criteria based policies for different landscape character areas in order to maintain and enhance local character and distinctiveness. New development should build-in landscape features and reflect the landscape context of the development. Landscape assessments should be undertaken for all proposed site allocations.

Biodiversity

Biodiversity is a core component of sustainable development, underpinning economic development, and has an important role to play in developing locally distinctive and sustainable communities.

The Local Authority may find the Nature on the Map website useful to source information on conservation sites and important habitats.

We advise that any development proposals should avoid designated sites, avoid damage to existing biodiversity features, and create opportunities for enhancing biodiversity through the delivery of Local Biodiversity Action Plan (LBAP) targets.

LBAPs identify the action required at a local level to deliver UK and regional targets for habitats, species, public awareness and involvement. They also identify targets for other habitats and species of importance in the more local context of their geographical area. Further information about Biodiversity in the

UK is available on the JNCC website, including details relating to UK BAP priority species and habitats.

Natural England does not hold protected species records and therefore cannot advise as to the likelihood of their presence on allocation sites. Information on non-statutory sites and species records may be obtained from your local Wildlife Trust and/or local Environmental Records Centre and such information should be considered when assessing sites for housing development.

Geodiversity

Planning policies should take a strategic approach to the conservation, enhancement and restoration of geodiversity, and promote opportunities for the incorporation of geodiversity interest as part of development.

Local authorities should ensure that appropriate weight is attached to the geodiversity interest of designated sites as well as geodiversity interests within the wider environment, and maximise opportunities to include geodiversity in and around developments as part of the design process. Further information on geodiversity is available on Natural England's website.

Soils

Early consideration should be given to the quality of soil resource affected by potential housing sites and therefore the SHLAA process provides a useful opportunity to consider soils and to ensure their protection during the plan making process.

Local authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local authorities should seek to use areas of poorer quality land in preference to that of a higher quality (NPPF, paragraph 112).

Land quality varies from place to place. The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future use within the planning system. It helps underpin the principles of sustainable development. Further information is provided on Natural England's website.

Green Infrastructure

Green Infrastructure (GI) should be an integral part of the creation of sustainable communities and the allocation process can provide a useful starting point to consider GI provision of new sites and policy development through the Local Plan.

One important function of GI is the provision of new opportunities for access to open space. Natural England's 'standards for accessible natural greenspace' (ANGSt) should be used to ensure new and existing housing has appropriate access to nature. More information can be found on Natural England's publication, '*Nature Nearby, Accessible Greenspace Guidance*' (March 2010), available on our website, publication reference NE265.

The CABE Space Guidance '*Start with the Park*' (2005) outlines the importance of planning around green spaces, with consideration being given to the context of local landscape character and contribution to the wider GI network. The provision

of new GI should be considered at an early stage to ensure it is deliverable at plan stage.

The importance of Green Infrastructure (GI) should be clearly recognised in the plan and although touched upon in the Issues and Options report needs to be considered throughout particularly through the environmental policies, but there are also opportunities for GI links to be made through all the key areas: balanced development, education, housing and health. A clear focus in relation to GI provision and where possible such provision should be incorporated into new development and this need to be reflected in the Issues and Options paper.

[The Natural Environment White Paper](#) highlights the importance of GI in planning; 'We need urban green infrastructure to complete the links in our national ecological network. Urban green space allows species to move around within, and between, towns and the countryside.

Even small patches of habitat can benefit movement. Urban green infrastructure is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heatwaves. It is part of the answer to the challenges posed by a changing climate.' (para 2.78, White Paper), 'We want urban green spaces to be recognised as an essential asset and factored into the development of all our communities. They will be managed to provide diverse functions for the benefit of people and wildlife. They will cool urban areas and reduce flood risk, helping communities to adapt to a changing climate. They will continue to play a key role in regeneration projects throughout England, supporting local economic growth. Greener neighbourhoods and improved access to nature will improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystem services and will contribute to coherent and resilient ecological networks' (Para 2.80, White Paper)

Natural England has developed a GI signposting document, which may be of assistance, it includes detail in relation to GI provision and provides some best practice example of LDF policies relating to GI.

http://www.naturalengland.org.uk/Images/GI-signposting_tcm6-11961.pdf

The provision of a sustainable network of green infrastructure - parks, green spaces and other types of multi functional green space - is an integral component of the infrastructure necessary to support sustainable growth. We expect green infrastructure requirements to feature strongly in all the environmental sections of the paper and link closely with the core strategy.

Sustainability Appraisal Revised Scoping Report

We believe the methodology, assessment and recommendations in the report generally meet the requirements of the SEA Regulations in assessing the effects of the Plan on environmental, social and economic objectives. The SA objectives being considered seem appropriate.

Habitats Regulations Assessment

We note the HRA Screening Report will be published following the Issues and Options Consultation. As a reminder the plan must be screened with respect to The Conservation of Habitats and Species Regulations 2010 to determine whether an Appropriate Assessment is required. In addition, the screening needs to consider not just the potential impacts of this plan but also any cumulative or in-combination effects when taking account of other plans and projects, including those in relevant authorities beyond the boundary. We suggest that the process of HRA runs in parallel to the development of the plan (i.e. the three stages of issues & options, preferred options, publication). If the HRA process is initiated from the outset, its findings from earlier stages can be used to inform subsequent stages, e.g. preferred options. We look forward to being consulted on this in the near future.

If I can provide any further advice relating to this consultation, please do not hesitate to contact me. For all other correspondence, please contact the address above.

Yours sincerely

Kate Wheeler
Lead Adviser
Land Use Operations

Kate.wheeler@naturalengland.org.uk

The Public Health and Regulatory Services Departments of Walsall Council have undertaken a brief joint review of the Walsall Council SAD Consultation documentation and Walsall Town Centre Area Action Plan. It is anticipated that this initial response will be the start of an ongoing dialogue and the development of closer links between the Public Health, Regulatory Services and Planning sides of Walsall Council, not just in relation to this strategy, but also to wider planning issues of common interest. This will ensure that impacts on health and wellbeing can be assessed and wherever possible managed to maximise the positive influence that proposed developments have on the health and wellbeing of local residents. This approach will support Walsall Council in delivering against its new Statutory duty to improve the health of its local population.

General response

Given the level of diversity within and across our communities, we consider that it will not always be appropriate to have blanket policies on potential site allocations, or indeed wider strategic planning application. For example, the health and economic priorities identified for one area or community may not feature as priorities for another. Therefore, in some instances, it will be more appropriate to consider the merit of potential development sites on a case by case basis.

Decisions should take into account the recommendations of the Walsall Joint Strategic Needs Assessment (JSNA) and Health and Wellbeing Strategy.

There is a need to make more effective use of Health Impact Assessment (HIA) methodology and we see this as a key area where the Public Health and Regulatory Services Departments can work together with Planning colleagues.

In coming to decisions about site allocations and developments, accessibility issues should be taken into consideration and active and sustainable travel modes promoted. Public Health can support the decision making process by mapping residents' access to sites and facilities for a variety of transport modes including walking, cycling and use of public transport.

There is a need to review how we, together with NHS and other partners, make full use of statutory provisions such as Section 106, to ensure that local health and education services are not placed under increased pressure as a result of future developments.

Walsall Town Centre Area Action Plan

- We applaud and support the emphasis on economic regeneration and sustainability within the plan; these are key drivers of health improvement.
- Wherever possible and pertinent, the health impact of each proposal should be considered.
- Regulatory services work closely with new and existing business to support growth and expansion, as well as promoting local health priorities and public health initiatives. There is a strong track record of Regulatory Services and Public Health working closely together to tackle health inequalities in Walsall and we would seek to extend this partnership working to include Planning colleagues, to ensure that these proposals take full account of the health and wellbeing needs of the Borough's residents.

Walsall Council

From: Holliday Chris
Sent: 24 May 2013 13:31
To: Smith Mike (Strategic Planning)
Subject: Planning 2026 comments

Hi Mike

Further to our conversation on 3 May, please find below my comments as promised:-

Leisure:-

- L:Q1 The facility would probably survive for a further 10 years with next to no investment. To protect town centre leisure it would be a "least worse" option than closure.
- L:Q2 One option may be indoor bowling and / or ice skating could be considered in a joint venture with the private sector. A suggestion might be that the Gala Pool hall could be converted into one, the other (or both if a mezzanine were used); this may then permit the retention of the Brine Pool next door.
- L:Q3 The old LEX / Wharf location would be the obvious alternative but the Gala location would keep "leisure" in the Civic Quarter.
- L:Q4 Good quality, attractive, well designed, warm, clean, polite staff, reasonable pricing ...
- L:Q5 Yes; to support the general public's access to sport, leisure and recreation, to support the ethos of "more people, more active, more often", increase levels of physical activity and thereby have a positive impact (through non-medical, preventative and diversionary activities) on the overall health & well-being of Walsall's residents
- L:Q6 Dedicated "This way to Walsall's Arboretum" signage from the town centre and station? Maybe the outline of animals, birds, leaves or trees on the footpath as a trail leading to the Arboretum
- L:Q7 Once the Visitor Centre is built this will become more of a destination. Bit difficult now the Marketing team's gone ...
- L:Q8 Yes, but only if it's affordable in capital and revenue terms.
- L:Q9 Yes
- L:Q10 Probably the Leather Museum
- L:Q11 N/a.
- L:Q12 One for the Town Centre Partnership / Manager I would suggest. The Council does not seem to have any resource (now) to do this sort of thing.
- L:Q13 N/a.
- L:Q14 N/a.

- L:Q15 Option 1. Better to focus things together to get a better critical mass rather than separate “live” and “dead” areas
- L:Q16 Good quality, nice restaurants. Brewers Fayre and some of the Indians are good but ...
- L:Q17 Lichfield Street would be good as it would then link the Civic Quarter and town up to the Arboretum; very attractive mature tree lined “avenue”
- L:Q18 N/a.
- L:Q19 No. Possibly at the Wharf ~ but does need parking too
- L:Q20 N/a.
- L:Q21 Possibly some development which caters for their leisure / repairs needs etc ~ maybe in the “Urban Splash” canal basin “leisure” use building (always liked the idea of that building for my Leisure Trust
- L:Q22 See L:Q21 above ...
- L:Q23 Option 1. Feel it would be a natural progression of the high street, retail up to Next, Brewers Fayre, NAG, the Urban Splash building and (maybe) the cinema
- L:Q24 I don’t live here or nearby so wouldn’t. Ten pin bowling, cinema etc may work well though
- L:Q25 Between Brewers Fayre and the old LEX site

Community & Leisure:-

- CL:Q1 Under statement 5, it may be useful / necessary to add “It may also be necessary to consider alternative models of delivery.”
- CL:Q2 Just checking the map 6.2, the Council owned Indoor Leisure (yellow square box) does not show Bloxwich Leisure Centre, Gala Baths “looks” like its moved to the SW of the town centre (but is this another site?). Also, to the SW of the Borough there are three Council owned Indoor Leisure (yellow square boxes): one will be Darlaston Swimming Pool, what are the other two? Plus, Darlaston Town Hall doesn’t look like it’s there.
- CL:Q3 Option 2. The approach where the “overall common good” is better; in that those most in need, or those who would benefit most, are indeed those who do not speak up ...
- CL:Q4 No, not at this stage. What is required is the replacement of Oak Park and Bloxwich Leisure Centres and improvements to Darlaston Swimming Pool.
- CL:Q5 Not at this stage.
- CL:Q6 Yes, as with CL:Q6. To support the general public’s access to sport, leisure and recreation, to support the ethos of “more people, more active, more often”, increase levels of physical activity and thereby have a positive impact (through non-medical, preventative and diversionary activities) on the overall health & well-being of Walsall’s residents

CL:Q7 As previously; new, attractive, well designed leisure centres at Oak Park and Bloxwich.
Various evidence including overlaid areas of deprivation that show Darlaston and Bloxwich being in the highest centres of combined deprivation (see attached slides).

Also (various):-

HO:Q1 How about the Hawbush (Forest Arts and WACC) site? Already within housing estate, access from three roads, WACC want to move elsewhere, Forest Arts “could” be elsewhere; if it survives future budget cuts

EH:Qs Just a thought; “ ... that the strategic contribution that the new Active Living Centres (Leisure Centres) can make to the health of Walsall residents does need to be recognised.” Or something along those lines

Any queries, please let me know

Chris

Mr C G Holliday
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Tel: 01922 650339

Walsall Site Allocation Document *Consultation*
Walsall Town Centre Area Action Plan *Consultation*
Consultation Response – Pollution Control, Engineering & Transportation Services

Response on behalf of Pollution Control, Engineering & Transportation Services
Re. Air Quality & Noise

Key Issues

1. Air Quality - Strategic

It is well established that the, along with other metropolitan areas, the borough experiences poor air quality along strategic road networks. The issue of concern rests with nitrogen dioxide emissions associated with light duty and heavy duty vehicles (LDVs & HDVs) and a failure to achieve the national air quality objective for nitrogen dioxide (NO₂) as set out in The Air Quality Strategy for England, Scotland, Wales and Northern Ireland (NAQS). The NAQS mirrors EU Air Quality Limit Values which member states are required to achieve; failure to do so may result in infraction proceeding against member states, and in the UK central government has indicated for which the European Commission it may pass on fines *pro rata* to Local Authorities who fail to undertake reasonable measures to address air quality issues in their area.

The Town Centre Area Action Plan and Walsall Site Allocation Document should in principle ensure:

- ▶ Sensitive development is not introduced to areas of failing air quality.
- ▶ Permitted development schemes do not give rise to any breaches of air quality objectives
- ▶ Where there is an existing breach of a national air quality objective, development is managed such that that no further degradation in air quality arises.
- ▶ Promotion of the West Midlands Low Emissions Towns & Cities Programme and adoption of the policies, principles and practices set out in the i) Low Emissions Strategy; ii) Good Practice Planning Guidance; and iii) Good Practice Procurement Guidance.
- ▶ Consistency with the Council's Air Quality Action Plan.

In line with the National Planning Policy Framework, planning policies and plans should sustain compliance with and contribute towards EU limit values

or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMAs) and the cumulative impacts on air quality from individual sites in local areas. In recognition of this, the whole of Walsall's borough is declared an AQMA for the purpose of elevated levels of nitrogen dioxide stemming from road traffic.

2. Air Quality – Local Impacts

In addition to strategic air quality concerns there exists potential for localised impacts to arise from industrial, commercial and minerals developments, for example, malodours and airborne dusts. Such localised concerns can exist on an individual or cumulative basis and should not denigrate local amenity.

3. Noise – Strategic

West Midlands Noise Action Plan is designed to address the management of noise issues and effects under the terms of the Environmental Noise (England) regulations 2006 as amended, thus covering noise from major roads, railways, airports and industrial sources.

Roads and railways that are subject to the Action Plan have been strategically noise mapped. Through this process Important Areas to be investigated for potential action have been identified using the road noise prediction method (Calculation of Road Traffic Noise – CRTN). Important Areas with respect to road traffic noise in the West Midlands are where the 1% of the population that are affected by the highest noise levels from roads subject to noise mapping is located. This approach is taken as populations at such locations are likely to be at the greatest risk of experiencing a significant adverse impact to health and quality of life due to traffic noise; in addition to this, locations have also been identified within this as First Priority Locations on account of excessively high noise levels for priority investigation in the context of noise action planning.

For each Important Area the relevant highway authority is to consider what, if any, action might be taken. Proposed actions are to be identified with reference to Government policy and ideally integrated with other environmental and related initiatives. In determining possible actions highway authorities should also take account of any benefit that might also be achieved for any other noise sensitive premises in the vicinity of Important Areas.

The Noise Policy Statement England sets out the long term Government noise policy which includes a Noise Policy Vision to 'promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development'. Noise Policy Aims are threefold. Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development:

- i) avoid significant adverse impacts on health and quality of life;

- ii) mitigate and minimise adverse impacts on health and quality of life; and
- iii) where possible, contribute to the improvement of health and quality of life.

Regulations require the protection of formally identified Quiet Areas. For the protection of quiet areas relevant local planning authorities and authorities that are responsible for sources of noise covered by the Noise Action Plan, can all have responsibilities

The Town Centre Area Action Plan and Walsall Site Allocation Document should in principle ensure:

- ▶ The aims of the Noise Policy Statement England are secured.
- ▶ Wherever practicable, new development contributes towards a reduction in noise levels.
- ▶ New development does not give rise to exceedances of criteria that would trigger qualification for designation of an Important Area in the context of the West Midlands Noise Action Plan.
- ▶ Development does not adversely impact on any designated Quiet Areas

4. Noise – Localised

Within the remit of the National Planning Policy Framework, policies and plans should aim to:

- i) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;
- ii) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;
- iii) recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and
- iv) identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason

New retail, office, leisure, transport systems, commercial, industrial and minerals development has the potential to adversely effect amenity.

The Town Centre Area Action Plan and Walsall Site Allocation Document should in principle ensure:

- ▶ Significant noise impacts do not arise at occupied noise sensitive premises and other noise sensitive locations.

- ▶ Where adopted, either regionally or locally, planning guidance in respect of noise is adhered to.
- ▶ Development does not adversely impact on any designated Quiet Areas.

4. New Sensitive Developments

By definition this includes residential premises, schools and any other developments likely to be adversely affected by elevated levels of noise and poor air quality.

The Town Centre Area Action Plan and Walsall Site Allocation Document should wherever practicable ensure that such developments are not introduced where:

- ▶ Air quality does not achieve, or is unlikely to achieve, any binding national air quality standard, objective or limit where there is no probability that either i) compliance can be achieved within 12 months of the development coming into use; or ii) mitigation can be applied to ensure occupiers and/or users are not exposed to poor air quality.
- ▶ Areas proposed for new residential and other noise sensitive development are not subject to significant impacts on account of noise, and other impacts are mitigated and reduced to a minimum.

Informative

For the purposes of guiding the consultation process reference should be made to the following:

- A. Walsall air quality map – modelled exceedances of the NO₂ national air quality objective. (Existing GIS layer updated periodically)
- B. Defra Noise Action Planning Important Areas (Tiles 74 and 75). (Draft new GIS layer prepared).
- C. West Midlands Low Emissions Town & Cities Programme Consultations: Draft Low Emissions Strategy; Good Practice Planning Guidance; and Good Practice Procurement Guidance

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