



Walsall Council

**Walsall Town Centre Area Action Plan
Schedule of Representations**

**Publication Stage Consultation
7th March – 3rd May 2016**

Formal Representations

UR 18 – UR 3556

Plus Late Responses UR 2274 and 2658

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Our ref: RF/Z0737

Date: 03 May 2016

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 Executive Director Economy and Environment
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Dear ██████████

Walsall Town Centre AAP Consultation

Columbia Threadneedle (CT) represent Zurich Assurance, owners of the Old Square Shopping Centre in Walsall; and I as the asset manager for the property write in response to the AAP consultation.

General Comments

CT welcome the emphasis on concentrating the retail within the heart of the town centre as per Policy AAPS1; and the consolidation of the area from the 2005 would reflect the reality of the changes to the retail core. There would be argument to further reduce this area to encourage consolidation and strengthening of the heart of the town.

The focus for gross additional floor space within the St. Matthews Quarter is welcome, as a further development of this part of the town centre is vital if it is to maintain its competitiveness against Crown Wharf.

Site Allocations

Considering the AAPS2 sites; CT are pleased to note the support for TC01 and TC02 and continue to look to bring forward development in this area. There is a proviso that development should not be 'above 3 storeys'; it should be noted that the existing car park within this area is greater than 3 storeys and should redevelopment be sought, building height would be a factor in viability. We would suggest that the wording be amended to remove the reference to a specific storey height to "...but any development should be of sensitive design to avoid dominating the surrounding character"

In respect of TC07, the wording should be strengthened to ensure any new development looks to better integrate the park into the town centre.

TC41, TC50 and TC55 CT are concerned that any development of scale within these areas could dilute any offer within the town centre by giving occupiers an alternate location. CT would prefer these were excluded from the retail opportunity areas unless a compelling sequential argument could be made.

Delivery

CT welcome the support to the delivery of further development in the St. Matthews Quarter as defined within section 3.2.3 Delivery.



The New Walsall Market

The New Walsall Market – Policy AAPS3, CT have long been advocates of a strong market as part of the town centre offer. CT are concerned that any development of the market is carried out in such a way that there is no impediment to the free flow of pedestrians between the St. Matthews Quarter and the remainder of the town centre; and that sight lines are in no way impeded to the Old Square and its anchor tenants from Park Street.

A place for Business

I have not commented upon section 4. A Place for Business, suffice that CT endorse any policy which will encourage additional visitors to the town centre, particularly an increase in the daytime captive population that have the potential to increase the vitality of the retail core.

I trust these comments will be factored into the evolution of the AAP; and would be happy to discuss them with you in more detail.

Kind regards.

Yours sincerely

██████████

For Zurich Assurance

Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
Area Action Plan: Policy AAPS1 'Primary Shopping Area'
Do you support or object to the plan?
Object
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Not positively prepared, not effective
Comments (continue on a separate sheet if necessary)
<p>As stated in our representations to the earlier 'Preferred Options' version of the document, we support a policy which seeks to concentrate new retail floorspace and investment within or immediately adjacent to the Primary Shopping Area (PSA). However, we considered it was misleading to say (in section 3.1.1) that the consolidation of the PSA had been to "remove areas where retail is unlikely to come forward". We note that these previous comments have been considered in this 'Publication Draft' and we support the revised wording to "remove areas where retail is <i>less likely</i> to come forward" (emphasis added).</p> <p>We previously commented that the former Shannon's Mill site (referred to as site TC26) is not an area where retail is less likely to come forward given its allocation within policy APPINV2 St Matthew's Quarter as a potential site for retail development. We recognised that in its current undeveloped form, the site does not act as part of the PSA but, with the realisation of the allocation, it will.</p> <p>In this context, we considered that the site (TC26) should be identified as a "PSA Expansion Area". In this way, any future retail development would be recognised as an extension to the PSA rather than being separate from it and hence accord with the sequential test. We note that the AAP Policies Map and associated policies have not been amended to reflect this as previously suggested.</p>

Document and reference(s) page / policy / paragraph
Area Action Plan: Policy AAPS2 'New Retail Development'
Do you support or object to the plan?
Object
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Not positively prepared, not effective, not consistent with National Policy
Comments (continue on a separate sheet if necessary)
<p>Part b) of the policy states that "Where retailing cannot be accommodated within or immediately adjacent to the Primary Shopping Area the Council will expect the following sites to be considered in order". The former Shannon's Mill site (TC26) is listed second in the order of sites to be considered, behind Jerome Retail Park (TC19).</p> <p>As stated in our representations to the earlier 'Preferred Options' version of the document, this wording implies that all of the sites listed are not immediately adjacent to the PSA. This is true for all but site TC26 which is immediately adjacent to the PSA – there is a shared boundary between the two.</p> <p>The separation between TC19 and the PSA is not extensive, but it is present. Moreover, TC26 falls within the St Matthew's Quarter boundary, an area prioritised for regeneration and as a shopping destination (AAPINV1). Therefore, we considered it was not clear why TC19 should be prioritised for retail development over TC26.</p> <p>We therefore suggested that, if the site was not identified as an extension site to the PSA, it should be prioritised in this policy and part b) reworded to read "Where retailing cannot firstly be accommodated within the Primary Shopping Area, or secondly immediately adjacent to it on the former Shannon's Mill site (TC26), the Council will expect the following sites to be considered in order". This suggestion has not been incorporated into the 'Publication Draft' AAP.</p> <p>We previously commented that part cii) of the policy was inconsistent with the NPPF as it required that edge of centre proposals should have "no adverse impact" on the town centre. We considered that this wording would impede proposals even where the impact is very slight. We note that these comments have been considered and the policy now reads "no <i>significant</i> adverse impact". We support the revised wording.</p> <p>We also commented in our earlier representations, we considered that part d) of the policy be reworded to read, "...planning conditions will be applied where necessary to limit the impacts of the development..." to reflect proposals would not have a significant adverse impact on the centre. We recognise that these comments have been considered and part d) have been reworded to read "planning conditions will be applied where necessary to minimise the impacts of the development". We support this amendment.</p>

Document and reference(s) page / policy / paragraph
Area Action Plan: Policy AAPINV2 'St Matthew's Quarter'
Do you support or object to the plan?
Object
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Not positively prepared, not effective
Comments (continue on a separate sheet if necessary)
<p>We previously commented that in part e) of the policy, the former Shannon's Mill site (TC26) should be allocated as a mixed use site to include retail and as an extension to the PSA, although other uses, including residential in particular, should be included as part of the mix. We considered that there was no reason to specify the type of retailing (i.e. convenience or bulky goods) on the former Shannon's Mill Site (TC26).</p> <p>We therefore suggested that part e) of the policy was amended to read "...is allocated as an expansion area for the Primary Shopping Area for retailing as part of a mixed use allocation, including residential". No such amended has been made in the 'Publication Draft'.</p>

Document and reference(s) page / policy / paragraph
Area Action Plan: Policy AAPB2 'Social Enterprise Zone'
Do you support or object to the plan?
Object
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Not positively prepared, not effective, not consistent with National Policy
Comments (continue on a separate sheet if necessary)
<p>Within this policy, the area around the Goldmine Centre (ref. TC25) as shown in the AAP Policies Map is designated as a Social Enterprise Zone. This policy states that the following uses will be acceptable as part of the social enterprise development:</p> <ul style="list-style-type: none"> • Community and cultural uses; • Education uses; • Small scale office developments; and • Live work units. <p>Such an allocation is unrealistic, and overly restrictive. Residential uses should be included within this list of acceptable uses within the designated Social Enterprise Zone for the reasons outlined below.</p> <p>Para 154 of the National Planning Policy Framework states that Local Plans should be aspirational but realistic. In addition to this, para 126 of the Framework states Local Plan strategies for the conservation of the historic environment should conserve heritage assets in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.</p> <p>Units 12-13 and 15-23 Lower Hall Lane are proposed as part of the Social Enterprise Zone (ref. TC25). These are Grade II Listed buildings, originally built as houses, which date back to the early 19th Century which have more recently been used for office accommodation. Despite continuous active marketing by the landlord for employment use since 2012, there has been no interest by potential occupiers and these units remain vacant.</p> <p>Given their listed status, these buildings need substantial work to bring them in to a lettable condition and these works are not viable on the basis of the office market, demand and rents achievable. Converting the buildings back to housing, i.e. their original use, would put them in a viable use which is consistent with their conservation, and with objectives to increase residential accommodation in and around the heart of the town centre.</p> <p>Moreover, there is a genuine developer interest to pursue residential use within these buildings. These representations have been submitted on behalf of the owner of these buildings who has recently sought pre-application advice on the change of use of these buildings to residential use.</p> <p>The clear intention of the owners of these buildings is to convert them to residential use. This is consistent with their original use, and the purpose for which they were constructed.</p>

Increasing the amount of residential accommodation within and around the heart of Walsall is consistent with promoting a mix of uses which will contribute positively to the vitality and viability of the place. It would also potentially offer the opportunity to provide houses in a central location, rather than apartments, which would increase the range of accommodation available.

A residential conversion would also represent a viable means of securing the future use of these listed buildings. Any allocation here needs to reflect market reality and the costs associated with restoring listed buildings. There has been no interest from office occupiers. Whilst other uses cannot be discounted entirely there has been no evidence to date that the acquisition and conversion of these buildings for the uses suggested by the draft allocation is viable.

Again, policy can be aspirational, but it must also be realistic, or it will have little worth. For the reasons expressed above, it is essential that residential use is supported as part of this allocation.

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
Area Action Plan: Policy AAPS1 'Primary Shopping Area' & Policies Map Suggested Modifications (continue on a separate sheet if necessary)
<p>That the former Shannon's Mill site (TC26) is identified as a "PSA Expansion Area" in the AAP Policies Map and associated AAP Policies.</p>

Document and reference(s) page / policy / paragraph
Area Action Plan: Policy AAPS2 'New Retail Development' & Policies Map
Suggested Modifications (continue on a separate sheet if necessary)
<p>For reasons set out in relation to Policy AAPS1, site TC26 should be regarded as an extension site to the PSA, and hence immediately in accordance with the sequential test. Policy should be amended to reflect this.</p> <p>If this approach is not agreed, then site TC26 should be prioritised in Policy AAPS2, which should be reworded to read, "<i>Where retailing cannot firstly be accommodated within the Primary Shopping Area, or secondly immediately adjacent to it on the former Shannon's Mill site (TC26), the Council will expect the following sites to be considered in order</i>". The current list would then be set out, excluding TC26, and renumbered accordingly.</p>

Document and reference(s) page / policy / paragraph
Area Action Plan: Policy AAPINV2 'St Matthew's Quarter'
Suggested Modifications (continue on a separate sheet if necessary)
<p>To provide greater clarity, the text in part e) of the policy should be amended to read, "<i>...is allocated as an expansion area for the Primary Shopping Area for retailing as part of a mixed use allocation, including residential.</i>"</p>

Document and reference(s) page / policy / paragraph
Area Action Plan: Policy AAPB2 'Social Enterprise Zone'
Suggested Modifications (continue on a separate sheet if necessary)
<p>This policy should be amended to allow residential use. If this approach is not accepted, than 12 & 13 along with 15 – 23 Lower Hall Lane should be omitted from the allocation TC25 on the AAP Policies Map.</p>



The Coal
Authority

Walsall Town Centre Area Action Plan (Publication Consultation)

Consultation Deadline – 3 May 2016

Contact Details

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The Coal Authority
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Person Making Comments

[REDACTED]
Consultant Planning Advisor to The Coal Authority

Date of Response

2 May 2016

Background on The Coal Authority

The Coal Authority is a Non-Departmental Public Body sponsored by the Department of Energy and Climate Change (DECC). The Coal Authority was established by Parliament in 1994 to: undertake specific statutory responsibilities associated with the licensing of coal mining operations in Britain; handle subsidence claims which are not the responsibility of licensed coalmine operators; deal with property and historic liability issues; and provide information on coal mining.

The main areas of planning interest to the Coal Authority in terms of policy making relate to:

- the safeguarding of coal in accordance with the advice contained in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales;
- the establishment of a suitable policy framework for energy minerals including hydrocarbons in accordance with the advice contained in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales; and
- ensuring that future development is undertaken safely and reduces the future liability on the tax payer for subsidence and other mining related hazards claims arising from the legacy of coal mining in accordance with the advice in The National Planning Policy Framework & Planning Practice Guidance in England, Scottish Planning Policy in Scotland, and Planning Policy Wales & MTAN2 in Wales.

As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required.

Background on Coal Mining Issues in Walsall Town Centre

Surface Coal Resources, Development and Prior Extraction

As you will be aware, the plan area contains coal resources which are capable of extraction by surface mining operations. These resources cover a small area of the south and west of the Town Centre.

The Coal Authority is keen to ensure that coal resources are not unnecessarily sterilised by new development. Where this may be the case, The Coal Authority would be seeking prior extraction of the coal. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process.

Coal Mining Legacy

As you will be aware, the plan area has been subjected to coal mining which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.

Problems can include collapses of mine entries and shallow coal mine workings, emissions of mine gases, incidents of spontaneous combustion, and the discharge of water from abandoned coal mines. These surface hazards can be found in any coal mining area, particularly where coal exists near to the surface, including existing residential areas.

Within the Plan area there are approximately 20 recorded mine entries, all but 1 in the western part of the Town Centre.

Mine entries may be located in built up areas, often under buildings where the owners and occupiers have no knowledge of their presence unless they have received a mining report during the property transaction. Mine entries can also be present in open space and areas of green infrastructure, potentially just under the surface of grassed areas. Mine entries and mining legacy matters should be considered by Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. No development should take place over mine entries even when treated.

Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not always a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable.

Specific Comments on The Walsall Town Centre Area Action Plan (Publication Consultation)

The specific comments and/or changes which The Coal Authority would like to make or see in relation to the above document are:

Representation No.1

Site/Policy/Paragraph/Proposal – Policy AAPI7: Addressing Potential Site Constraints: (d) Ground Contamination and Ground Conditions

Test of Soundness

Positively Prepared	Justified	Effective	Consistency to NPPF	Legal & Procedural Requirements Inc. Duty to Cooperate
✓	✓	✓	✓	✓

Support – The Coal Authority welcomes the inclusion of ground conditions within the list of potential constraints to development which may require further consideration by developers.

Representation No.2

Site/Policy/Paragraph/Proposal – Policy AAPI7: Addressing Potential Site Constraints: (f) Minerals Safeguarding Area (MSA)

Test of Soundness

Positively Prepared	Justified	Effective	Consistency to NPPF	Legal & Procedural Requirements Inc. Duty to Cooperate
✓	X	X	X	✓

Objection – The Coal Authority continues to consider that the statement made in the Policy regarding prior extraction being rarely feasible in Walsall is not justified.

This would in our view render the Plan out of general conformity to the Black Country Core Strategy and to the NPPF paragraphs 143 and 144. If this criterion is retained we consider the policy is unsound. We do however recognise that the surface coal resource only covers a small part of the overall plan area. The feasibility of prior extraction must be considered on a case-by-case basis.

Change Requested – The Policy should be amended as follows:

“Where non-mineral development is proposed in the MSA, which falls within the thresholds identified in BCCS Policy MIN1, applicants will be expected to consider the feasibility of extracting any minerals present in advance of the development (“prior extraction”). ~~It is recognised that in Walsall “prior extraction” of the above minerals will rarely be feasible.~~ The Council will therefore support non-mineral developments within the MSA where it can be demonstrated that “prior extraction” is not feasible, such as in the situations described in BCCS Policy MIN1.

Reason – In order to meet the requirements of paragraphs 143 and 144 of the NPPF

CONCLUSION

The Coal Authority welcomes the opportunity to make these comments. We are, of course, willing to discuss the comments made above in further detail if desired and would be happy to negotiate alternative suitable wording to address any of our concerns. The Coal Authority would be happy to enter into discussions ahead of any examination hearing process to try and reach a negotiated position if this were considered helpful.

Thank you for your attention.

For and on behalf of

Chief Planner / Principal Manager



Walsall Council
The Civic Centre
Darwall Street
Walsall
West Midlands
WS1 1TP

25th April 2016
Our Ref: 1615/5179

Dear Sirs,

WALSALL TOWN CENTRE AREA ACTION PLAN – PUBLICATION DRAFT PLAN

Brooke Smith Planning, Chartered Planning and Development Consultants, are instructed by AEW UK to make representations to the current consultation for the emerging Walsall Town Centre Action Plan (AAP).

As owner and manager of the Jerome Retail Park, AEW UK welcomes the opportunity to be involved in the development of the AAP and the future plans for Walsall Town Centre.

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, during the Preferred Options stage, AEW UK requested that the entire retail park be include within the Primary Shopping Area (PSA) designation. It was considered that this would enable the retail potential of the site to be maximised.

It is noted that the boundary of the PSA has not been altered in the current Publication version of the plan. As such AEW UK's consultation comments previously made on this point are still considered relevant.

Although AEW UK is keen to work with Walsall Council to deliver the AAP, there are key concerns relating to the proposed development of Bradford Place Bus Interchange. As set out in AEW UK's previous representations, the proposals will significantly encroach upon the Jerome Retail Park, hence reducing the current parking provision within the site. This will impact on the viability of the retail park and its ongoing operation. The boundary of the



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proposed bus interchange area has not altered from the previous draft version of the plan. As such AEW UK maintains an objection to this policy.

In light of the above, AEW UK requests a meeting with senior planning and regeneration officers to discuss how the Walsall Town Centre AAP can be best brought forward, while also safeguarding the future of the Jerome Retail Park. It is felt that such a meeting is crucial, particularly in relation to the policy justification for draft AAP Policy AAPT3, which states that:

'Improvements to Bradford Place Bus Interchange to create a new Town Centre Interchange will create a larger and more modern facility to allow for future increases in bus services and patronage. This would result in the loss of some of Jerome Retail Park in order to allow for the increased capacity. The Council will actively work with landowners to discuss the impact of this and to explore the relocation of affected businesses' (section 7.3.1).

It would be hugely beneficial to carry out these discussions prior to the AAP being considered by the Secretary of State's Inspector. The potential for a new bus interchange, including where and how it is delivered, is considered to be key to the AAP strategy, and as such it is not an issue which should be reserved for future consideration.

We look forward to hearing from you with regards to possible dates for a meeting with officers. Should you have any questions in the meantime please do not hesitate to contact me.

Yours faithfully,



Associate Director



Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
Please refer to letter of representation submitted on behalf of the Chief Constable of West Midlands Police.
Do you support or object to the plan?
Generally support the plan with some requests for consideration of amendments
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Comments (continue on a separate sheet if necessary)
Please refer to letter of representation submitted on behalf of the Chief Constable of West Midlands Police.

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
Suggested Modifications (continue on a separate sheet if necessary)
<p>Please refer to letter of representation submitted on behalf of the Chief Constable of West Midlands Police.</p>

▪
Planning and Architecture | advice | applications | drawings

Our ref. 8981 HRW

Planning Policy Team
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3rd May 2016

Dear Sir/Madam

Walsall Town Centre Area Action Plan Publication Draft: Formal Representations on behalf of the Chief Constable of West Midlands Police

We act for the Chief Constable of the West Midlands Police (CCWMP) and are instructed to make representations on local development documents in respect of securing policy reference in such documents to matters including:

- Recognising the community need for securing safe environments with crime reduction made a priority;
- Requiring developers to demonstrate how proposals address community safety and crime prevention in Design & Access Statements, or other relevant planning application documents;
- Promoting a safe and secure entertainment, leisure and evening economy;
- Ensuring 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;
- In appropriate cases, seeking financial contributions towards the additional expenditure burden placed on the PCCWM as a consequence of development proposals and growth;
- Ensuring the timely and effective engagement of the police and other

emergency services in the planning processes in relation to matters likely to affect crime and fear of crime; and

- Ensuring the timely and effective engagement of the police and other emergency services in relation to Counter-Terrorism matters. For example, Counter Terrorism Security Advisors can give appropriate advice concerning Vehicle-Borne Devices (VBD) mitigation and the Crowded Place agenda (particularly in relation to shopping areas and the night-time economy).

The CCWMP 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. Crime and the fear of crime are material considerations throughout the development process and Section 17 of the Crime and Disorder Act 1998 should be paramount.

To this end, we confirm we have already made representations on behalf of CCWMP in respect of the Walsall Town Centre Area Action Plan (AAP) Preferred Options. The CCWMP fully **SUPPORTS** the amendments proposed in the Draft Plan in so far as they relate to issues of crime, safety and security. The CCWMP is grateful that the Council has been able to incorporate the majority of the amendments requested in our submission made to the Preferred Options version of the AAP.

In particular, the CCWMP welcomes the new references to:

- crime prevention measures in support of an expanded evening economy and protection of amenities in Policies AAPLE1 and AAPLV1;
- Secured by Design principles and creation of safe learning environments in Policy AAPLV6;
- creating public realm routes that are direct, convenient, safe, well lit and of a safe and secure design in Policy APPLV7;
- ensuring cycle parking facilities meet Secured by Design standards ideally in a lockable room or container or externally with natural surveillance in Policy AAPT2;
- consulting with the Police and Crime Commissioner for West Midlands on public transport routes, to ensure that crime and fear of crime is minimised in Policy AAPT3 justification;
- consulting with the Police and Crime Commissioner for West Midlands on any major schemes that impact on road networks and ensuring any highway works, including temporary road closures while development is carried out and new road construction, are planned to maintain emergency service access and minimise opportunities for plant machinery theft. Policy AAPT4 justification; and
- requiring all car parking to provide a safe and secure environment to ensure both crime and the fear of crime are reduced. This will include meeting the current standards and advice given by the Association of Chief Police Officers (ACPO) such as the 'Park Mark' award/accreditation. Policy AAPT5 justification.

The CCWMP continues to welcome the policies and proposals retained from the Preferred Options version of the AAP which assist in meeting crime prevention and community safety objective. These include:

- creating a 'safe' town centre environment;
- the recognition that it is important to make the town centre feel safer when expanding the evening economy;
- the need for design to consider safety and security and 'Secured by Design' principles;
- ensuring safe movement of people, including the potential for creating safe, attractive links between open space and environmental assets; and
- creating safe cycle routes and for additional cycle parking to meet 'Secured by Design' principles.

The CCWMP notes that no additional crime reduction policies or justification are proposed which will address the escalating problem of Heritage Crime, ATM crime, and crime resulting from poorly maintained developments; all areas highlighted in the Preferred Options submission. Whilst, the CCWMP recognises that these areas could be controlled by, for example, appropriate planning conditions attached to development consents, and their exclusion will not make the AAP unsound, he still requests that further consideration be given to the introduction of enabling development management policy justification within the AAP. This could, for example:

- recognise that it may be preferable, in certain instances, to use 'replica' valueless materials on Listed Buildings or within Conservation Areas to deter crime and reduce the fear of crime;
- highlight the need for greater control over the siting and surveillance of ATM's to minimise crime and the fear of crime; and
- ensure development and redevelopment proposals consider the need for continued maintenance, such as in respect of landscaping, to reduce the risk of creating an environment in the future which might be more prone to vandalism and disorder.

In summary, the CCWMP supports the Publication Draft AAP and is grateful for the Council's positive response to requests for modifications made in the Preferred Options AAP consultation submission. The CCWMP has asked that further consideration be given to addressing the issues of Heritage Crime, ATM crime, and crime resulting from poorly maintained developments through the introduction of appropriately worded policies or policy justification. However, given that these areas could potentially be addressed in Supplementary Planning Documents or through development management controls and planning conditions, the CCWMP will not be raising objection to these omissions from the AAP.

We should be grateful if you would acknowledge receipt of this letter and ensure that it is submitted to the Examination Inspector.

Yours sincerely

[REDACTED]
Senior Planning Consultant
[REDACTED]

Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
AAPPLE2 – a (pages 40 – 41)
Do you support or object to the plan?
Support
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Comments (continue on a separate sheet if necessary)
<p>Sport England supports the inclusion of the Gala Baths in Policy AAPPLE2. Sport England has in the past invested in the Gala Baths through its former <i>Active England Fund</i> in the mid 2000s.</p> <p>The issues correctly identified on page 41 with the Gala Baths is that they do need serious investment. Part of this investment should come from CIL generated by the new dwellings from sites identified within this AAP.</p> <p>The new residents will increase the usage of the facility which is currently under pressure. The residents will also add pressure to the existing playing pitch stock and sports halls, so there will be a need to invest in new facilities locally.</p>

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
Suggested Modifications (continue on a separate sheet if necessary)

Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
AAPLV2 Education a)
Do you support or object to the plan?
Support
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Comments (continue on a separate sheet if necessary)
<p>Sport England has been in talks with Walsall College over a potential Artificial Grass Pitch which may be either within the AAP boundary or just outside it. It would be acceptable to use CIL towards its creation.</p> <p>This would be of benefit to both students and new residents as well as existing users of the town centre.</p>

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
Suggested Modifications (continue on a separate sheet if necessary)

Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
Walsall Town Centre Action Plan (page 53 & 111)
Do you support or object to the plan?
Support (see comments below)
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
n/a
Comments (continue on a separate sheet if necessary)
<p>The site designated TC47 is considered suitable for education purposes, particularly as the availability of the adjacent playing field could be developed into a sports pitch. This still remains the aspiration for Walsall College. Therefore, I would ask that you review the allocation of TC47 to be education/offices.</p> <p>I agree with the designation of TC48 and TC46 as this would, in the long run, create the learning quarter envisaged in the Gigaport planning and the original Walsall College Wisemore Campus development project.</p>

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
Suggested Modifications (continue on a separate sheet if necessary)

From: [REDACTED]
Sent: 21 April 2016 22:58
To: planningpolicy
Subject: planning 2026

I had the opportunity to look at your plans when you brought them to Aldridge shopping centre last week. The current plans seem to be well thought out and I am delighted that so much of the development sites are in brownfield areas. It is really important to protect the green belt.

Initially I intended to respond using your website but I found the questions in the consultation too technical, so I decided to use email instead.

10th April, 2016

Executive Director,
Economy and Environment,
Planning Policy,
Civic Centre,
Darwall Street,
Walsall.
WS1 1DG

Dear Mr. Neilson,

Re : Planning 2026 : Have Your Say.

Thank you for contacting us requesting comments on the third stage of consultation - called ' Publication '.

While we are not qualified to comment on such an impressive and comprehensive document, we have looked through it and should like to make a few observations.

We note that the Day Street car park is ear-marked for development (T.C. 50). We would assume that the proposed , much needed multi-storey car park (T.C. 41) would be built first to alleviate the problem of car parking in the town before removing the Day Street facility.

Cheap car parking is absolutely essential to encourage people into Walsall.

2.2. 1,2,3,4,5,7,9,10. It is vital that improvements are made because nobody will wish to visit unless the town is made more inviting.

3.3. The market is absolutely vital in encouraging more people into the town. It is a shadow of the marvellous facility which used to dominate the shopping experience in Walsall with an enormous variety of stalls.

4. We should like to congratulate all involved in regenerating Littleton Street with the development of Walsall College, Walsall Housing Group, Jhoots etc.

The re- development of the Town Wharf area is excellent with the cinema, restaurants and superb housing around the canal being most impressive.

You are to be praised for the residential developments throughout the borough.

The Saddler's Centre is also a credit to you all especially the establishment of the new Healthcare facility and T.J.Hughes store.

We are also pleased to note that you intend to Protect and Enhance the Historic Character and Local Distictiveness of the area. The re- location of the local history centre has been under review for many years and we note that this is not included in the plan. It should be. We realise that these are stringent economic times but we feel that the re- location nearer the town centre could become a valuable source of income to the town. T.C. 32/33. The whole of Bridge Street to Lichfield Street, including the boarded up

public house on the corner of Freer Street desperately need attention, especially as it is so near the town centre and town hall as well as a major bus route into the town.

We know that you have tried to clean up the town but the litter problem is still manifesting itself.

The area around the bus station and Butler's Passage is still a disgrace.

There are strict laws regarding litter and they need to be policed and fines issued.

The traffic through this area is also supposed to be restricted but vehicles disregard signs and are allowed to get away with the offence.

We are aware of the enormous task that lies ahead in trying to regenerate Walsall and we wish you well in the urgent exercise.

Thank you again for keeping us informed.

Yours sincerely,



Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
Do you support or object to the plan?
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Comments (continue on a separate sheet if necessary)
<p>2-3 - WALSALL TOWN CENTRE — AFTER A BRIEF LOOK AT THE PLANS AT WALSALL WOOD LIBRARY, (I HAVE NOT GOT A COMPUTER + DON'T WANT ONE) I THINK THAT THE CRESCENT SHAPE OF THE BRIDGE SHOULD BE KEPT AS OPEN AS POSSIBLE — THE MARKET STALLS HAVE RUINED THE CENTRE OF WALSALL + PARK STREET + THEY SHOULD NOT BE THERE!!</p> <p>6.5 - PROTECTING THE CHARACTER OF WALSALL TOWN CENTRE.. WE HAVE SOME LOVELY ARCHITECTURE IN THE CENTRE OF WALSALL — YOU HAVE ONLY GOT TO LOOK AT</p>

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
<p>Suggested Modifications (continue on a separate sheet if necessary)</p> <p>THE BEAUTIFUL BRICKWORK OF BANKS & BUILDINGS AROUND THE CENTRE — THE OLD TAYLORS MUSIC SHOP, THE CORNER OF BRIDGE STREET (THE OLD WALSAH MUTUAL BUILDING) WHAT IS TO BE DONE WITH THE OLD STORK HOTEL — IT SPOILS THE OLD SQUARE AREA OF THE TOWN. — THE OBSERVER OFFICE BUILDING IS ANOTHER BEAUTIFUL BUILDING — THESE OUGHT TO BE PRESERVED, NOTHING WILL REPLACE THEM.</p> <p>THE MARKET AT THE BOTTOM OF PARK STREET HAS RUINED THE WHOLE OF ^{THE} CENTRE OF WALSAH — I HAS MADE IT IMPOSSIBLE FOR PEDESTRIANS AND THE ACCUMULATION OF RUBBISH HAS MADE THE AREA DIRTY — I DO NOT GO INTO WALSAH VERY OFTEN NOW — IT PUTS ME OFF !!</p> <p>THE MARKET WOULD BE MUCH BETTER IN THE ORIGINAL SQUARE AREA AT THE DEBENHAMS END OF THE SQUARE — IT IS LESS OBTRUSIVE TO THE CENTRE BRIDGE AREA, WHICH COULD BE MADE A PLACE WITH BENCHES & PERHAPS A RECREATION AREA.</p> <p>I ALSO AGREE THAT ALL THE OFFICE & BUSINESS AREA WOULD BE BEST KEPT AT THE STAFFORD STREET END OF THE TOWN, WHICH IS ALSO IN A DERELICT STATE.</p> <p>THE WHARF AREA HAS IMPROVED THE TON STREET END OF THE TOWN & THE WATERFRONT IS A LOVELY ADDITION, BUT IT WOULD HAVE BEEN NICE TO HAVE A THEATRE WITH RESTAURANT IN THAT AREA — IT WOULD HAVE BEEN THE IDEAL PLACE.</p>



WEST MIDLANDS OFFICE

[REDACTED]
Walsall Council
The Civic Centre
Darwall Street
Walsall
WS1 1DG

[REDACTED]
Our ref: PL00017275

3 May 2016

Dear [REDACTED]

[REDACTED]
RE: Walsall Town Centre Area Action Plan

Thank you for the email consultation of 8 March 2016 in relation to the above. Historic England welcomes the wording revisions and amendments that have been made in respect of the historic environment and has no further comments to make on the AAP document at this publication stage.

I hope that this information is of use to you at this time.

Yours sincerely,

[REDACTED]
[REDACTED]
Historic Environment Planning Adviser
[REDACTED]



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk



From: [REDACTED]
Sent: 22 March 2016 10:54
To: planningpolicy
Subject: Re: Planning 2026: Have Your Say - Event Invitation

No comment xx

Sent from my iPhone

On 22 Mar 2016, at 10:51, planningpolicy <planningpolicy@walsall.gov.uk> wrote:
<mime-attachment.jpg>

Dear Sir / Madam,

Planning 2026: Have Your Say

You should have already received an email from Walsall Planning Policy notifying you of the third stage of consultation on Walsall Site Allocation Document, Walsall Town Centre Area Action Plan and Draft Charging Schedule' for the Community Infrastructure Levy. This consultation runs for 8 weeks, starting on Monday 7th March 2016 and ending on Tuesday 3rd May 2016. This is the 'publication stage' of consultation and the Council is publishing the plans in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. If you did not receive this initial email please let us know and we can resend you a copy.

We would like to invite you to our main consultation event on Thursday 7th April 2016 at the Council House where you can come and discuss the plans with us. There is no need to book on to this event, please just come along at a time that suits you between 1pm and 7pm. Details of other consultation events are available on our website www.walsall.gov.uk/planning_2026.

Previously we have arranged evening meetings locally around the borough in places like Blakenall, Bentley and Darlaston to address area-specific concerns and we would be happy to arrange further local meetings if people would like us to do this. If you have any ideas for consultation events in your area please contact the Planning Policy to discuss.

All consultation documents are available to view and download online at www.walsall.gov.uk/planning_2026 and paper copies of the main documents will be available to view in your local library and at the First Stop Shop in Walsall Civic Centre, Darwall Street. In order for the Council to formally take into account your views they must be submitted in writing and forms are available on our website to help you to give us your comments. Responses can be sent to planningpolicy@walsall.gov.uk or by post to Planning Policy, Regeneration and Development, Economy & Environment Directorate, Walsall Council, Civic Centre, Darwall Street, Walsall, WS1 1DG.

Contact Walsall Council's Planning Policy Team

Please contact us if you have any queries or require the documents to be



Planning Policy Team
 Regeneration and Development
 Economy and Environment Directorate
 Walsall Council
 Darwall Street
 Walsall
 WS1 1DG

Our Ref: HD/WTCAAP/PUBSTAGE
 Telephone: [REDACTED]
 E-mail: [REDACTED]
 Date: 3 May 2016

Re: Walsall Town Centre Area Action Plan (Publication Stage)

Dear Sir/Madam

Thank you for inviting comments on the Walsall Town Centre Area Action Plan (AAP) Publication Stage. The comments in this letter represent the views of the West Midlands Integrated Transport Authority (ITA) and Centro who act as the Passenger Transport Executive (PTE) for the West Midlands.

We welcome the opportunity to respond to this publication consultation, given the strategic importance of Walsall and the key role it plays in delivering the growth agenda, meeting future economic and housing demand and in attracting and retaining investment. It is vital therefore that Walsall is able to provide the necessary infrastructure and high quality transport links across Walsall and beyond.

Overall, the Walsall Town Centre AAP is supported, setting out an approach for growth and development underpinned by a sustainable transport system in accord with the ITA's Strategic Transport Plan "Movement for Growth". The ITA also welcome the positive partnership working with Walsall MBC to develop further, the sustainable transport approach of the plan, necessary for Walsall to successfully accommodate the scale of new development planned.

Coordination with other Plans and Policies

Reference to the approved Strategic Transport Plan for the West Midlands Metropolitan Area "Movement for Growth" covering a twenty year time period (<http://wmita.org.uk/strategy-and-publications.aspx>) is welcomed by the ITA. This sets out the overarching transport strategy for the West Midlands Metropolitan area covering a metropolitan tier with a metropolitan rail and rapid transit network, a key route network and metropolitan strategic cycle network.

Policy AATP1 Pedestrian Movement Access and Linkages & Policy AATP2 Cycling

The ITA would however welcome reference to the development of the Metropolitan Strategic Cycle Network, as set out in Strategic Transport Plan "Movement for Growth", the emerging Black Country Walking and Cycling Strategy and how town centre routes should be connected to the wider Metropolitan Cycle Network. Also the provision of good quality cycle parking should be accompanied with consistent regional branding, signage and mapping etc.

Alongside the Metropolitan Cycle Network, reference to the ITA's approved Cycle Charter should also be mentioned and the importance of integrating the cycle network with the public transport network. This document sets out principles for transforming cycling in the region and provides a shared vision in terms of developing a coordinated cycle network.

Policy AATP3 Public Transport

The ITA welcomes the policy on public transport but further development under Policy AATP3, Point C, regarding SPRINT is suggested. Consideration should be paid to future SPRINT Bus Rapid Transit lines and stops in the town centre and all routes should adhere to the Approved ITA SPRINT Standard's.

The town centres road network also needs to consider the operation of longer Bus Rapid Transit vehicles in terms of manoeuvring and consideration should be paid to how public transport, including SPRINT, will serve existing and new developments. .

7.3.1 Policy Justification

In terms of the policy justification for public transport within the AAP , the ITA request that recognition of the Key Route Network and how it will provide more efficient use of road space, taking into account all modes of travel (including walking, cycling, bus and car use).

Furthermore, Centro and the ITA are currently developing 'Bus Network Development Plans' encompassing how the bus network will evolve over the next 20 years. Walsall's Bus Network Plan will be based upon high level land use changes and major infrastructure projects and referencing this plan, will be vital to ensure that the bus network fully supports any proposed developments.

7.3.2 Evidence

Under this section, we request that reference is made to the following:

- Black Country Rapid Transit review (2015) which sets out the public transport links for connecting the strategic centres of the Black Country with each other and with Birmingham city centre
- The Bus Network Development Plan can be included in the delivery and evidence base sections of this policy when it is ready.

7.3.3 Delivery

Walsall MBC will also work with the new Combined Authority to deliver solutions as part of this new authority and will deliver such schemes and programmes within the Devolution Deal.

Policy AAPT4: Road Improvements

We welcome the aspiration to maintain and improve access in and around the Town Centre. Within this, the importance of bus and ensuring sufficient capacity for buses stopping should be recognised.

As previously mentioned, reference to the Key Route Network should be noted which serve the main strategic demand flows of people and freight, and provide connections to the national strategic road network. The Key Route Network covers Littleton Street West and Blue Lane West and is within the Strategic Transport Plan for utilising of the highway capacity more effectively (to cater for movement of all modes including rapid transit and core bus routes, the Metropolitan Cycle Network, lorries, vans and private cars). The allocation of road space should cater for all modes including public transport and cycling and should therefore be noted under the Key Route Network and referenced under policy AAPT4.

7.5 Improving Town Centre Car Parking

Parking provision and pricing in Walsall Town Centre needs to promote economic growth, clean air and improved health and quality of life for people and reflect the approach of the ITA's Strategic Transport Plan "Movement for Growth".

It is important that any increased parking should NOT have a detrimental effect on the flow of buses and respect the below policy within the Strategic Transport Plan:

- Ensuring town centre access for core bus routes facilitates their minimum commercial speed of 16 km per hour am peak journey times;
- Ensuring city centre access for SPRINT Bus Rapid Transit lines facilitates a minimum commercial speed of 20 km per hour am peak for proposed SPRINT routes in Walsall;

The provision of high quality, secure parking for motorbikes, scooters and cycles is welcomed but the provision of CCTV at such locations is also recommended. Provision of safe cycle parking is essential for supporting the development of cycling as a practical transport choice. A lack of appropriate safe cycle parking facilities is often cited as a barrier to cycling and cycle ownership and use, and could be a constraint on the future growth of cycling.

Summary

The WMITA and Centro support the vision for Walsall as contained within the AAP and broadly support its aims and policies. Key areas of interest are:

- Referencing the ITA's Strategic Transport Plan "Movement for Growth" is requested, under the appropriate sections;
- Under AATP1 and 2, reference to the emerging Black Country Walking and Cycling Strategy, the wider Metropolitan Strategic Cycle Network and the ITA's Cycle Charter should all be noted;

- Under AATP3, reference to adhering to ITA approved SPRINT Standards in terms of developing future SPRINT lines and stops in the town centre is important, together with recognition to how SPRINT connects with existing public transport interchanges;
- Under AATP4, reference to the Key Route Network should be made in terms of ensuring highway capacity is used more effectively to cater for all modes; and
- Walsall's Town Centre Car Parking should align to that of the ITA's Strategic Transport Plan parking policy objective and there should be no detrimental effect on the flow of bus speeds and /or other modes.

Delivering the AAP

We like to further reiterate our support for the partnership approach that has been taken to addressing the strategic transport needs of the plan and the wider area and would welcome further dialogue as this plan develops.

We would also offer any support required in developing a comprehensive infrastructure plan that enables the successful delivery of the AAP. The early development of this infrastructure plan will give potential investors confidence and allow funding and financing packages to be developed and is therefore a crucial piece of supporting evidence.

Yours Faithfully,



SENIOR POLICY OFFICER – ECONOMIC DEVELOPMENT AND SOCIAL COHESION



Our ref: Walsall Planning 2026
Your ref Walsall Planning 2026:

Planning, Monitoring and Delivery Officer
Walsall Council
Via Email: PlanningPolicy@walsall.gov.uk

██████████
Asset Manager
Network Delivery and Development
The Cube
199 Wharfside Street
Birmingham
B1 1RN
www.highways.gov.uk

12 April 2015

Dear Sir / Madam,

RE: PLANNING 2026: Main Modifications for Walsall Site Allocation Document (SAD), Town Centre Area Action Plan (AAP) and Community Infrastructure Levy Charging Schedule (CIL)

Thank you for forwarding me details of the consultation dated 7 March 2016 on the above referenced Walsall Planning 2026 documents, which comprise the Site Allocation Document (SAD), Town Centre Area Action Plan (AAP) and Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule.

HIGHWAYS ENGLAND (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provision of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN near to Walsall comprises the M6 Motorway and the A5 Trunk Road.

The SRN is a critical national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. Highways England welcomes the opportunity to provide the following comments on the Walsall ‘Planning 2026’ documents.

Where applicable, agreements made in response to comments on the draft consultation documents at a meeting between representatives of Walsall Council and Highways England meeting on 14 January 2016, have been incorporated in to the Main Modifications.

We continue to support an improvement scheme at M6 Junction 10 but recognise the current funding gap, which is considered within the CIL Charging Schedule. We believe this scheme is imperative in facilitating the future delivery of development within Walsall. Whilst we understand an improvement scheme at Junction 9 is currently an aspiration, and understand why it is not included within these documents, we believe that it may be required to facilitate future development which may, or may not, include the overspill of housing from Birmingham.

We welcome that the SAD recognises an aspiration to maintain a 25 metre buffer between development and the SRN to allow for future maintenance and any potential improvements. We also welcome that the SAD sets out the requirement for development to adhere to DfT Circular 02/2013 and the Design Manual for Roads and Bridges (DMRB) guidance and standards, where applicable.

If you have any questions regarding our response please do not hesitate to contact me.

Yours sincerely,



NDD Midlands

Email: [Redacted]

CC [Redacted]
[Redacted]
[Redacted]

Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

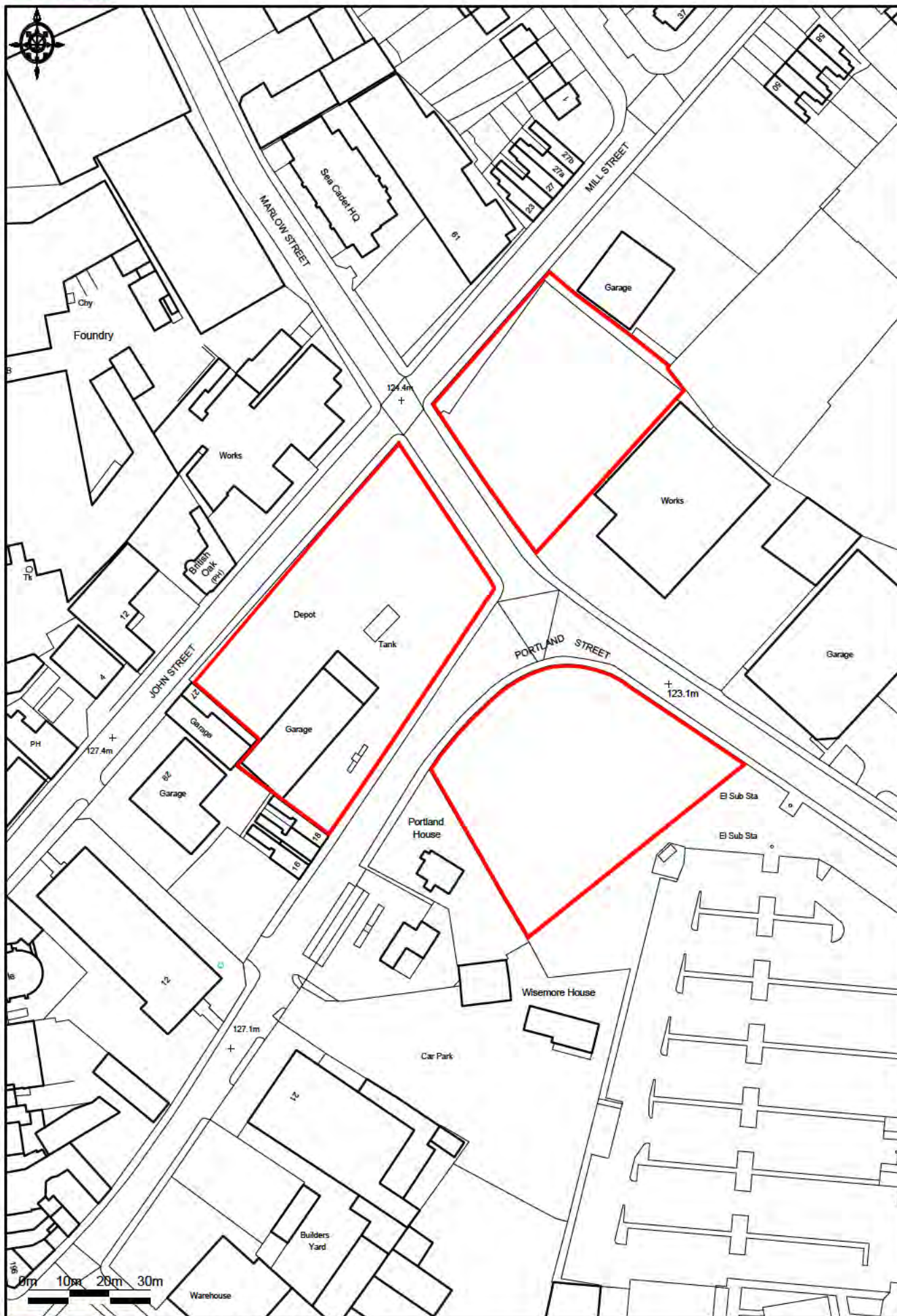
Document and reference(s) page / policy / paragraph
Policy AAPB3: Town Centre Employment Land: Site Reference TC47: North of Portland Street (John Street)/North of Portland Street area and Policies Map
Do you support or object to the plan?
Support
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
N/A
Comments (continue on a separate sheet if necessary)
<p>These representations are made on behalf of J Hayward & Sons of Walsall Ltd who own three parcels of land at Portland Street, Walsall as edged red on the attached drawing 4530/99. The company is long established; they were established in 1919. The company, from its location in Walsall, undertake container haulage, general haulage, low loader/plant movement, tipper haulage, as well as providing trailer hire and a CPC driving school. Their clients include TK Max, Sainsburys and Goodyear.</p> <p>At the site in Portland Street, Walsall, the company employs some 100 staff (who are employed in the office and administrative function, within the yard and as drivers). The company presently have an Operators Licence from the site for some 46 vehicles.</p> <p>J Hayward & Sons of Walsall Ltd have been in consultation with Walsall Council about the potential for relocating to a new site sufficiently close to their existing site to maintain staff but on a single, rather than a split site (as the company operates from three different but adjacent sites at present) so as to improve the efficiency of the business.</p> <p>The identification of the land to the north of Portland Street (site reference TC47) for a “release employment site” is supported.</p> <p>It is noted within the supporting Policy justification (paragraph 4.3.1) that the Planning Authority generally supports a movement of industry out of the town centre and that appropriate town centre uses are considered suitable for existing employment sites.</p> <p>The relocation of the existing company to a new site also offers significant environmental benefits to Walsall town centre by removing the amount of traffic (particularly by large goods vehicles) associated with the lawful use which has an Operators Licence for some 46 vehicles.</p> <p>Support is therefore given to Policy AAPB3 and in particular the allocation of site TC47 as a “consider for release” employment site. In supporting the application, it is imperative for J Hayward & Sons of Walsall Ltd that if they are to realise their ambition to relocate to more suitable premises in the locality, that they should realise the best value for their site. In order</p>

to do this, the widest possible range of alternative uses for the site must be possible. In this respect, the redevelopment of “**consider for release**” employment sites for alternative town centre uses (excluding A1 Retail) is supported since a flexible range of uses is imperative in order to enhance the prospects of redeveloping such town centre employment sites.

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
Suggested Modifications (continue on a separate sheet if necessary)



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Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
Policy AAPLV2: Education Site TC46: East of Portland Street and AAP Policies Map
Do you support or object to the plan?
Object
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
On the basis that the plan is not positively prepared, justified effective and/or consistent with National Policy.
Comments (continue on a separate sheet if necessary)
<p>These representations are made on behalf of J Hayward & Sons of Walsall Ltd who own three parcels of land at Portland Street, Walsall as edged red on the attached drawing 4530/99. The company is long established; they were established in 1919. The company, from its location in Walsall, undertake container haulage, general haulage, low loader/plant movement, tipper haulage, as well as providing trailer hire and a CPC driving school. Their clients include TK Max, Sainsburys and Goodyear.</p> <p>At the site in Portland Street, Walsall, the company employs some 100 staff (who are employed in the office and administrative function, within the yard and as drivers). The company presently have an Operators Licence from the site for some 46 vehicles.</p> <p>J Hayward & Sons of Walsall Ltd have been in consultation with Walsall Council about the potential for relocating to a new site sufficiently close to their existing site to maintain staff but on a single, rather than a split site (as the company operates from three different but adjacent sites at present) so as to improve the efficiency of the business.</p> <p>It is noted that the Walsall Town Centre AAP generally supports (see paragraph 4.3.1) the movement of industry out of the town centre. In this respect, representations have been made on behalf of J Hayward & Sons of Walsall Ltd to Policy AAPB3, in particular Site Reference TC47 that identifies the company's land to the north of Portland Street as a "consider for release" employment use.</p> <p>In the context of building a strong and competitive economy, the Government is committed to securing economic growth in order to create jobs and prosperity. The National Planning Policy Framework (the Framework) states (paragraphs 18-19) that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth, and that planning should operate to encourage and not as an impediment to sustainable growth.</p> <p>Objection is raised to site reference TC46: East of Portland Street on the basis that the allocation of the site for education purposes under Policy AAPLV2 is too restrictive.</p>

The Planning Authority evidently accept the principle of releasing town centre employment uses for appropriate town centre uses. It is submitted that the allocation of site TC46: East of Portland Street for educational purposes is too restrictive.

There is no evidence to demonstrate that Walsall College need site TC46: East of Portland Street to meet its development aspirations, or indeed have the resources to deliver the proposed development in the plan period. There is a real risk that the proposed land use allocation will blight rather than ensure development.

It is respectfully submitted that site TC46: East of Portland Street should be treated in exactly the same way as sites TC47 to the west; that is, it should simply be identified as a “**consider for release**” employment use that is suitable for a range of town centre uses (excluding A1 Retail). Such an allocation would not preclude site TC46: East of Portland Street being used for educational purposes if it was genuinely required by Walsall College for its future expansion since educational use would fall within the definition of “**town centre uses**”.

The issue that J Hayward & Sons of Walsall Ltd have with the allocation of the site for education under Policy AAPLV2: Education, is that such an allocation is too restrictive and will limit the potential future use of the site. Whilst economic circumstances are not normally a planning consideration, they are if this existing business that employs some 100 people are to be successfully relocated in the locality. If the relocation is to be secured, then the maximum value for the existing sites must be achieved, otherwise the company will not be able to move; this could fetter the ability of the company to trade in the future. The public interest of the residents of Walsall would not be served by retaining the allocation of this site for education since it will neither enable an existing company to relocate, enabling it to secure the existing employment it supports and potentially increase local employment; it would also ensure that the problems associated with town centre or employment in terms of the environment of Walsall Town Centre are not addressed.

If the Planning Authority is to fulfil its requirement to support sustainable economic growth and encourage sustainable growth of the economy, it is respectfully submitted that the allocation of Policy TC46 should be changed to a “**consider for release**” employment site under the terms of Policy AAPB3: Town Centre Employment Land. The continued allocation of site TC46 for educational purposes under the provisions of Policy AAPLV2: Education would represent an impediment to sustainable economic growth contrary to the advice contained in the Framework (paragraphs 18-19).

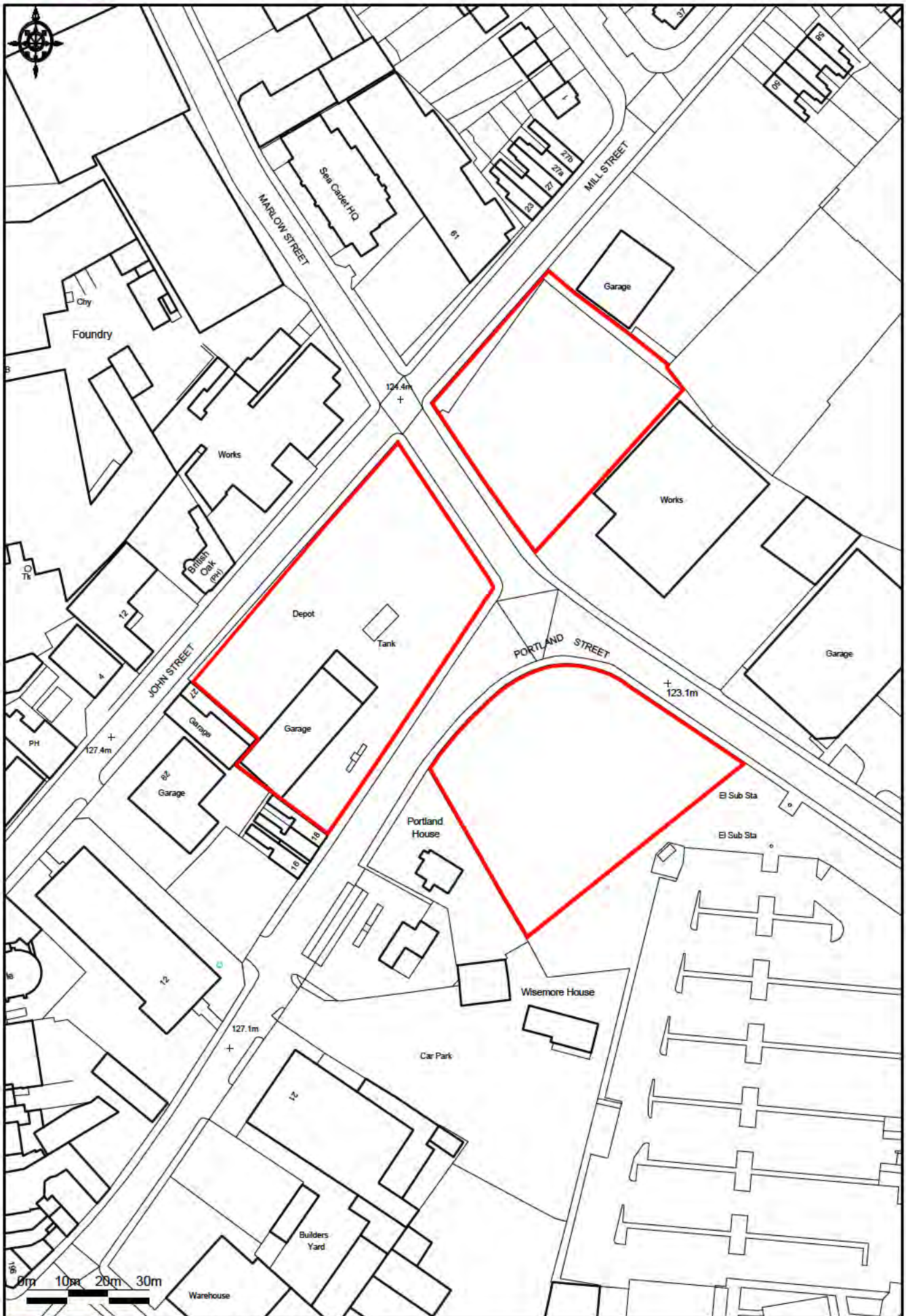
The site allocation TC46: East of Portland Street, Should be excluded from Policy AAPLV2: Education. The site should, however, be reallocated as a “**consider for release**” employment site under the terms of Policy AAPB3: Town Centre Employment Land,

The objectors would be more than willing to attend meetings with the Planning Authority to discuss the basis of this objection.

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
Suggested Modifications (continue on a separate sheet if necessary)



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Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
Policy AAPS2: New Retail Development
Do you support or object to the plan?
Object
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Please refer to enclosed cover letter
Comments (continue on a separate sheet if necessary)
Please refer to enclosed cover letter



our ref: TR/050222
 your ref: [REDACTED]
 email: [REDACTED]
 date: 3 May 2016

Planning Policy
 Regeneration and Development
 Economy & Environment Directorate
 Walsall Council
 Civic Centre
 Darwall Street
 Walsall
 WS1 1DG

By Email

Dear Sirs,

WALSALL TOWN CENTRE AREA ACTION PLAN
CONSULTATION RESPONSE
REPRESENTATIONS ON BEHALF OF WALSALL BESCOT PRADERA LIMITED

We are instructed by our client and owner of Bescot Retail Park, Walsall Bescot Pradera Limited, to submit representations to the Walsall Town Centre AAP: Publication Draft Plan, the consultation on which runs until 3rd May 2016. On the basis that these representations are made within the prescribed timescales, we trust they will be taken in account.

Paragraph 23 of the NPPF states that local planning authorities should allocate a range of suitable sites to meet the scale and type of retail and other uses needed in town centres.

Despite the Council's September 2015 evidence base identifying a need for just 6,000 square metres of comparison floorspace and 1,500 square meters of convenience floorspace over the plan period, Policy AAPS2: New Retail Development allocates a large number of sites for retail opportunities without any reference to the scale of need that the site is capable of meeting. Moreover, the key evidence base supporting the policy (Walsall Town Centre Demand Study & Development Sites Assessment, September 2015) does not identify retail as an appropriate land use on a number of these sites. Those sites are listed below along with the relevant commentary in the Council's evidence base.

Site	Proposed Allocation	Evidence Base
TC41: Challenge Block	Retail opportunity for convenience/ bulky goods and an allocation for a multi storey car park and Community Hub as part of a mixed use scheme.	WMBC have an ownership interest and have committed resources to undertake a Site Investigation (SI) and clear their part of the site in order to facilitate its delivery. We consider this site to be appropriate primarily for the following uses: Super Car Park, Offices (including civic office and 3rd sector uses); alternatively, Residential.





Site	Proposed Allocation	Evidence Base
TC26: Former Shannon's Mill	Retail opportunity for convenience/ bulky goods along with mixed use opportunity including housing and live/work ²	Residential Roadside Services Potential alternative use: Convenience Retail (if not delivered at Jerome Retail Park and/or potentially Cordwell Site) ²
TC07: Crown Wharf	Retail opportunity for convenience/ bulky goods ²	Long term 'Development Management Site' opportunity <i>No Additional Retail including variation of conditions controlling, for example, the sale of particular retail goods or the amount of permitted retail floorspace</i>
TC50: Day Street Car Park	Retail opportunity for convenience/ bulky goods ²	Residential (potentially in the form of Live/Work accommodation) Offices including civic office and related community uses Alternatively: Super Car Park (if not delivered at Challenge Block) ²
TC55: Wisemore (Cordwell Site)	Retail opportunity for convenience/ bulky goods ²	WMBC expect a (revised) planning application to be submitted later in 2015. We consider this site to be appropriate primarily for the following uses: Residential, Offices; alternatively, Convenience Retail. ²

Multiple references to retail opportunities for convenience/ bulky goods is not justified when viewed against the Council's own evidence base. The lack of identified capacity indicates that this scale and number of allocations could never be delivered over the plan period, not least because more central allocations (sites TC01 to TC05) are likely to accommodate the scale of need identified.

Jerome Retail Park for example, which is already fully let to a range of food and non-food retailers on long leases, is also identified as a location for some element of convenience retailing, but with just 1,500 square metres of identified need over the Plan period, an allocation for 'Retail opportunity for convenience/ bulky goods' which anticipates 'comprehensive redevelopment' is completely unrealistic and undeliverable.

Reference to bulky goods retailing in all of the above site allocations is also unjustified and is not supported by the Council's evidence base. No express capacity is identified (beyond comparison goods capacity) and a single enquiry from a DIY operator should not result in such a broad brush approach, which could frustrate retail development which is more appropriately located. DIY and bulky goods retailing in general does not sit comfortably within a town centre context because of the space and operational requirements. Existing retail parks are far better equipped to deal with any intensification to accommodate this demand, subject to the application of the relevant tests.



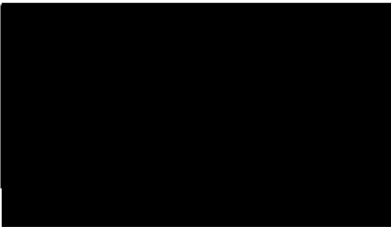
Page 3

Finally, Figure 3.1 of the APP refers to 'sequential sites for convenience/bulky goods retail development' suggesting that the allocations are only being advanced as a mechanism to defend against edge of centre or out of centre proposals. This is not in the interests of good plan making and the retail tests at paragraphs 24 and 26 of the NPPF are already in place to control this type of development.

In conclusion, Policy AAPS2: New Retail Development is not justified, effective or consistent with national policy. It is therefore not sound.

We trust these representations will be taken into account and notified of the AAP's progress moving forward.

Yours faithfully,



Director

Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
Policy AAPLV8: Environmental Infrastructure
Do you support or object to the plan?
Support
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Comments (continue on a separate sheet if necessary)
<p>We support the references to street trees and particularly Policy AAPLV8 which calls for: "Existing trees within the town centre will be protected and maintained where feasible and additional trees and planting will be encouraged".</p> <p>This fits with national policy under - woodland creation forms a significant element of the Government Forestry Policy Statement (Defra Jan 2013): <i>'We believe that there is scope for increasing England's woodland cover significantly to deliver economic, social and environmental benefits. We want to see significantly more woodland in England. We believe that in many, although not all, landscapes more trees will deliver increased environmental, social and economic benefits. We particularly want to see more trees and woodlands in and around our towns and cities and where they can safeguard clean water, help manage flood risk or improve biodiversity'</i>.</p> <p>The Natural Capital Committee, in its 3rd Report to Government, calls for for significant additional investment in major woodland creation programmes. Their research shows that large scale woodland creation projects, adding up to 250,000 additional hectares, located near towns and cities, could generate net societal benefits of £500 million per annum. This kind of large scale planting could be a mix of native and non-native planting schemes, delivering a wide range of environmental and economic benefits for numerous communities.</p> <p>We would also like to see this policy cross reference to the forthcoming Walsall Urban Tree Strategy.</p>

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
Suggested Modifications (continue on a separate sheet if necessary)

From: [REDACTED]
Sent: 18 April 2016 11:47
To: planningpolicy
Subject: Regeneration of old lex rover site

Dear sir/madam my name is [REDACTED], I recently responded to a email from the chamber of commerce asking for opinions for regeneration of the old lex rover site, stating that we don't need anymore tasteless apartments /retail outlets etc but turn the site into a marina helping to encourage what businesses we already have to grow, it's sad to think that the black Country was built on our canal networks, but our local canals are so run down its heart breaking, If a residential or over night marina was built it could encourage boat shows exebitions, and many of the local businesses would benifit including my own family business that my late father established in Walsall back in the mid fifties and is still family run in [REDACTED] [REDACTED]. In conclusion and been a narrow boater myself a marina has a beauty all of its own & also add a touch of class to walsall, anyway off soap box kind regards [REDACTED]

08/03/2016

Planning Policy
Regeneration and Development
Economy & Environment Directorate
Walsall Council
Civic Centre
Darwall Street
Walsall
WS1 1DG

Dear Sir or Madam,

Walsall Planning 2026: Have Your Say - Publication Stage Consultation

Thank you for your recent consultation on the above. We have considered the proposal relevant to the mobile network operators Vodafone and Telefonica(O2) and would offer the following comment on their behalf.

We would take this opportunity to comment that we consider it important that there is a specific telecommunications policy within the emerging Local Plan. We consider that the vital role that telecommunications play in both the economic and social fabric of communities merit the inclusion of a policy which refers specifically to telecommunications developments.

National guidance recognises this through Section 5: "Supporting high quality communications infrastructure" of National Planning Policy Framework (March 2012) which provides clear guidance as to the main issues surrounding telecommunications development.

The National Planning Policy Framework (NPPF) at paragraph 42 confirms that;

"advanced, high quality communications infrastructure is essential for sustainable economic growth and play a vital role in enhancing the provision of local community facilities and services."

Paragraph 43 of NPPF confirms that;

"in preparing local plans, local planning authorities should support the expansion of telecommunications networks",

but should also;

"aim to keep the numbers of radio telecommunications masts and sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified."

As indicated above, the formulation of policy does not exist in isolation and there are numerous documents which will affect the formulation of any telecommunications policy, the most important of these being NPPF. On this basis we would suggest that a concise and flexible telecommunications policy should be included within the emerging Local Plan. Such a policy should give all stakeholders a clear indication of the issues that telecommunications development will be assessed against.

We would suggest a policy which reads;

"Proposals for telecommunications development will be permitted provided that the following criteria are met:

- (i) the siting and appearance of the proposed apparatus and associated structures should seek to minimise impact on the visual amenity, character or appearance of the surrounding area;***

- (ii) ***if on a building, apparatus and associated structures should be sited and designed in order to seek to minimise impact to the external appearance of the host building;***
- (iii) ***if proposing a new mast, it should be demonstrated that the applicant has explored the possibility of erecting apparatus on existing buildings, masts or other structures. Such evidence should accompany any application made to the (local) planning authority.***
- (iv) ***If proposing development in a sensitive area, the development should not have an unacceptable effect on areas of ecological interest, areas of landscape importance, archaeological sites, conservation areas or buildings of architectural or historic interest.***


When considering applications for telecommunications development, the (local) planning authority will have regard to the operational requirements of telecommunications networks and the technical limitations of the technology.”

We would consider it appropriate to introduce the policy and we would suggest the following;

“Mobile communications are now considered an integral part of the success of most business operations and individual lifestyles. With the growth of services such as mobile internet access, demand for new telecommunications infrastructure is continuing to grow. The authority is keen to facilitate this expansion whilst at the same time minimising any environmental impacts. It is our policy to reduce the proliferation of new masts by encouraging mast sharing and siting equipment on existing tall structures and buildings.”

We trust you find the above comments of assistance. Please do not hesitate to contact me should you have any queries relating to the above matters.

Regards,


CTIL (Vodafone and O2) Regional Community and Planning Specialist – North West

Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
Do you support or object to the plan?
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Comments (continue on a separate sheet if necessary)
<p>We are pleased to note that representations submitted by the Trust in response to the 2013 & 2015 consultations on the AAP have been duly considered.</p> <p>The Trust have no further comments to make in relation to the Publication Draft.</p>

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
Suggested Modifications (continue on a separate sheet if necessary)

Request to be notified

As part of the publication consultation you can a request to be notified of the next stages in the process. If you would like to be kept informed please select the relevant stages below:

Comments

Please state clearly the document you are commenting on and include policy reference, site references and chapter titles where relevant.

Document and reference(s) page / policy / paragraph
Policy AAPS2
Do you support or object to the plan?
Object
If you object, on which test(s) of soundness do you base your objections? (positively prepared, justified, effective and/or consistent with national policy)
Positively prepared, justified and consistency with national policy.
Comments (continue on a separate sheet if necessary)
Please see attached letter.

Suggested Modifications

Please state clearly which policy you are proposing modifications to and the changes you would like to see.

Document and reference(s) page / policy / paragraph
Policy AAPS2
Suggested Modifications (continue on a separate sheet if necessary)
Please see attached letter.

our ref: **SR/Q70182**
 your ref:
 email: stephen.rose@quod.com
 date: 03 May 2016



Planning Policy,
 Regeneration and Development,
 Economy & Environment Directorate,
 Walsall Council,
 Civic Centre,
 Darwall Street,
 Walsall,
 WS1 1DG

VIA EMAIL

Dear Sir/Madam,

Walsall Town Centre Area Action Plan Consultation Response Representations on behalf of Ropemaker Properties Limited

These representations are submitted on behalf of our client, Ropemaker Properties Limited, in response to the Walsall Town Centre Area Action Plan (AAP) consultation. Ropemaker Properties is the owner of Reedswood Retail Park and the adjacent Sainsbury's superstore in Walsall.

The representations seek to ensure that the AAP does not allocate sites for retail development where that use is not justified. Were it to do so, the requirements of the sequential and impact tests would demand consideration of these sites, adding unnecessarily to the burden upon businesses looking to invest in retail development outside of town centres. The representations refer to Policy AAPS2: New Retail Development which appears not to have been positively prepared or justified with evidence.

a) Assessment of the Suitability of Proposed Shopping Allocations

The emerging Walsall AAP Policy AAPS2: New Retail Development identifies six edge-of-centre locations suitable for retail development: TC07, TC19, TC26, TC41, TC50 and TC55. It is accepted that TC07 (Crown Wharf) and TC19 (Jerome Retail Park) are existing retail destinations, justifying their inclusion as edge-of-centre locations for retail development.

The remaining four sites TC26 (Former Shannon's Mill), TC41 (Challenge Block), TC50 (Day Street Car Park) and TC55 (Wisemore) are all identified in Figure 3.1 *A Place for Shopping Allocations* as "Sequential sites for convenience/bulky goods retail development", whilst also being identified on the AAP Draft Policies Map and within the draft Walsall AAP for other uses.

There is no justification for allocating these sites for bulky goods retail development. There are three main reasons for this:

1. There is insufficient need to justify allocating so many town centre sites to retail use;
2. There are other priorities identified by the draft AAP and its evidence base for these sites;



3. The evidence base underpinning the draft AAP is out of date.

1. Insufficient need

The DTZ 2015 study, which provides the evidence base for the draft AAP, identifies only a small need for further retail floorspace in Walsall town centre:

Table 1: Retail capacity forecasts for Walsall Town Centre

		2016	2021	2026
Comparison Goods	sq m net	-5,900	-1,350	2,250
	sq m gross	-6,800	-1,550	2,600
Convenience Goods	sq m net	-700	50	650
	sq m gross	-900	50	800

Source: Table 2.5, Walsall Town Centre Demand Study & Development Sites Assessment (DTZ Sept 2015)

As the table above shows, there is no need for further floorspace until later in the plan period. Even then, the scale of the need is very modest. It certainly does not justify the identification of six sites to meet it. This scale of need could be accommodated within existing vacancies or as modest extensions to existing stores.

2. Other priorities

The DTZ study does not recommend any of the four sites not currently in retail use (TC26, TC41, TC50 and TC55) for bulky goods retail development. The report's recommendations for each are summarised in the table below:

Table 3: Summary of DTZ's recommended uses for AAP sites

Site	Recommended use
Shannon's Mill	Residential, roadside services, convenience retail
Challenge Block	Offices, super car park, leisure. third sector/community
Day Street	Super car park, offices, budget supermarket, residential
Wisemore (Cordwell Site)	Offices, residential

Source: Section 9, Walsall Town Centre Demand Study & Development Sites Assessment (DTZ Sept 2015)

It is hard to understand why these four sites, having been recommended for these purposes by the council's consultants, are stated in the AAP as potential sites for bulky goods retailing. Even where convenience retail is considered appropriate, the DTZ report makes clear that other uses may be preferable. Given the limited scale of need identified, it must be the case that these other uses should take priority. In short, the evidence does not support the approach adopted in the draft AAP.

3. Out of date evidence base

Although the DTZ study of 2015 is the evidence base for the draft AAP, it is based on a household survey of shopping patterns undertaken in 2009. There have been considerable changes in the retail market since then

Page 3

and local shopping patterns are likely to have changed. It is not a robust basis for allocating sites for retail use.

b) Conflict with national policy

National planning policy seeks to proactively drive and support economic development. The identification of sites as potential opportunities for retail investment, without any clear evidence, would be contrary to the National Planning Policy Framework (NPPF) which states that:

"Investment in business should not be over-burdened by the combined requirements of planning policy expectations." (Paragraph 21).

Requiring sequential assessment of sites that should not be allocated for retail development would be to unnecessarily over-burden potential investors. The only purpose of the allocations appears to be to place barriers in the way of further out of centre retailing. This is not the proper use of an Area Action Plan – which is to plan positively for a specific area – and is not supported by the NPPF.

The NPPF also requires Local Plans to be justified:

"...the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence." (Paragraph 182).

In this case, the draft AAP's own evidence base supports other uses for the identified sites. This suggests that there is a reasonable alternative strategy for the town centre than allocating so many sites for convenience or bulky goods retail development.

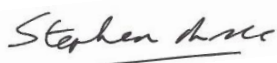
c) Recommendation

The identification of sites TC29, TC41, TC50 and TC55 as sites for convenience and bulky goods retailing under Policy AAPS2 is not justified. We therefore suggest that these sites are removed from Policy AAPS2.

d) Notification

We trust that this letter and the enclosed form is sufficient for you to register the above submission representation. We should be grateful to be kept informed of any further consultations, progress on the Local Plan and any other related planning documents.

Yours faithfully,



Stephen Rose
Associate

Enc. As noted

Cc: Ropemaker Properties Limited

Late Responses

Walsall Council as a Duty-to-Cooperate body is required to take into account the representations made by other Duty-to-Cooperate bodies within and outside of the formal consultation period. Consequently the following representations have been included within the schedule of representations despite having been received after the closing date of the consultation.

Date: 04 May 2016
Our ref: 180799 SM 040516 TCAAP
Your ref: [Click here to enter text.](#)



Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

[REDACTED]
[REDACTED]

BY EMAIL ONLY

Dear [REDACTED]

Planning consultation: Walsall Town Centre Area Action Plan (AAP) Publication Draft

Thank you for your consultation on the above. You will recall Natural England (NE) responded to the Draft Plan on 210 October 2015 and we echo the sentiment of comments previously made.

I am aware from my recent communication with Pete that the deadline for the consultation period has been extended and understand that these comments are, therefore, admissible.

NE has reviewed the above document and, in generic terms, welcome the minor amendments made to the Plan as a result of previous consultation. We find the Publication Draft reflects the needs and opportunities for people and wildlife more positively providing opportunity for policy to help maximise the delivery of an enhanced environment / public realm for the town centre area. Specific support is provided for the related amendments made to Objective 9 and Policy AAPLV8 (Environmental Infrastructure).

With regard to Policy AAPLE4: Walsall Canal, however, we advise you that implementation of the proposed policy criterion (a) may potentially impact upon the Cannock Extension Canal SAC to the north. We have had sight of the associated (joint) Habitat Regulations Assessment (HRA) February 2016, however, this does not make reference to the TCPAA in respect of the SAC. Criterion (a) and its support of increased moorings may potentially result in increased boat traffic along the network. We believe this may fall outside initiatives assessed as part of Policy ENV4 of the Black Country Joint Core Strategy HRA. Is your authority satisfied that the SAC will not be adversely affected by this Policy? We should perhaps have a discussion on this once I have reviewed further documentation which has come to me in respect of the Hatherden Canal Project.

I understand that my colleague [REDACTED] will be responding to the Cannock Chase SAC elements of this document under separate cover.

We will also provide our formal response in respect of the CIL and SAD consultations under separate cover within the next week or so. However, should you wish to discuss in the meantime please do not hesitate to give me a call. Happy to discuss informally.

Kind regards

Yours sincerely

[REDACTED]
Lead Adviser – Sustainable Development
[REDACTED]
[REDACTED]



Walsall Metropolitan Borough Council
Regeneration Strategy
The Civic Centre
Darwall Street
Walsall
West Midlands
WS1 1DG

Our ref: UT/2006/000279/AP-
04/SB1-L01
Your ref: Walsall AAP Publication
Date: 04 May 2016

Dear Sir,

WALSALL TOWN CENTRE AREA ACTION PLAN PUBLICATION DRAFT PLAN

Thank you for consulting us on this document.

Culverts

Following our previous comments in relation to opening up culverts within the Town Centre, and subsequent conversations and emails with the council, we acknowledge that there would be great difficulty in achieving this within the centre given the depth of the watercourses unless there was a coordinated Masterplan to redevelop large areas of the Town Centre at the same time.

Walsall Canal and Walsall Waterfront

We would suggest that there is inclusion of further wording to improve the canal corridor through sensitive design and landscaping and to function more effectively as a Green Corridor as part of the Green Network (Policy AAPLE4) . This could then feed through to the Walsall Waterfront comments where we were suggesting canalside improvements through that policy aswell, (Policy AAP14). We would be happy to provide some specific wording if required for the policy.

However, we are happy that the majority of our suggested changes have been made within the policies or the accompanying justification.

Yours faithfully


Planning Specialist

Environment Agency
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

[REDACTED]