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16 April 2009

Jenny Hough
Programme Office
Floor 3 Civic Centre
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ST4-1RF

Dear Ms Hough

NEWCASTLE-UNDER-LYME AND STOKE-ON-TRENT CORE SPATIAL STRATEGY

Further to your e-mail to my colleague Alastair Thornton dated 6 April 2009, I set out below comments on behalf of our clients in respect of the hearing statement submitted by Nathaniel Lichfield and Partners on behalf of Capital Shopping Centres.

In respect of NLP's comments we refer to their individual paragraph numbers as appropriate.

In respect of NLP Paragraph 2.5 we endorse their comments in respect of the WMRSS Phase 2 Revision referring to requirements rather than targets as referred to in the Core Strategy. Again we endorse NLP's highly relevant comment that requirement equates to a need that should be met rather, whereas a target may merely be an aspiration or an aim which the Council seek to meet.

In respect of NLP Paragraph 2.6, again we endorse the comments that the floor space requirements set out in the Core Strategy relate solely to Stoke City Centre and Newcastle Town Centre whereas the requirement set out in the WMRSS Phase 2 Revision set requirements for all strategic centres. Policy PA12b refers to non-strategic centres and Policy PA13 recognises the role of out-of-centre retail development albeit the proposals need to take account of government guidance in respect of out-of-centre retail proposals.

However, as pointed out in our written representations, the floorspace provision for the strategic centres in PA12 only equates to around 80% of the total RSS identified capacity with the remaining being identified for other centres.

In respect of NLP's Paragraph 2.14, again we concur with their views and their suggested policy change such that of the floorspace identified in Paragraph 5.53 as being required in Stoke-on-Trent City Centre and Newcastle-under-Lyme Town Centre this should be provided in accordance with the sequential approach.

In respect of NLP's comments with regard to the Inspectors question H, we generally concur with the views that this does not preclude development in other locations provided this is consistent with National Policy where a sequential approach is followed.

In respect of NLP's Paragraph 2.33 we do take issue with the suggestion that policy should specifically restrict growth in existing retail parks and the development of any new retail parks. Out-of-centre retail development is a recognised form of retail development both in National Policy and in the RSS Revision, subject to the appropriate tests. Where the requirement for additional floorspace cannot be met either in or on the edge of centres the sequential approach does allow that requirement to be met elsewhere.

Yours sincerely



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