

WEST MIDLANDS RSS – PHASE 1 – BRIERLEY HILL / MERRY HILL AND DUDLEY, RETAIL POLICY

STATEMENT BY THE CAMPAIGN TO PROTECT RURAL ENGLAND (WEST MIDLANDS)

[Please note this response covers both Matters 6 and 7.]

6.1 Brierley Hill / Merry Hill as a Strategic Centre

CPRE accepts the logic for identifying Merry Hill/Brierley Hill as a strategic centre provided the criteria are met to ensure its future characteristics conform more closely to those of a town centre. We recognize that the centre has a part to play in the regeneration of the Black Country and that this may require some expansion. We are concerned about some of the potential implications of expansion, but believe that these can be largely addressed by this review and by a rigorous monitoring regime as long as it can effectively influence the level of expansion.

6.2 Guidance on Growth Beyond 2016

The review sets out how monitoring will control growth at Merry Hill and how that will ensure development at Merry Hill does not undermine other strategic centres. This is an important issue. Previous proposed expansions of the centre were aimed at increasing its acceptable drive time to include places like Walsall which were previously only partly affected by the centre. There is also a risk that improving transport (even public transport) from other retail catchment areas to Merry Hill will divert trade from them.

We, therefore, believe monitoring is vital and would like to see the expansion of Merry Hill / Brierley Hill linked to the expansion of other centres. In particular, growth beyond 2016 should be restricted if monitoring shows that the viability and vitality of other centres in and around the sub-region is suffering as a result of the growth of Merry Hill / Brierley Hill.

6.3 Meeting PPS6 Tests

As it stands Merry Hill performs as an out of centre retail park with some offices and other facilities nearby. Brierley Hill acts as a local centre. The two are poorly linked and public transport is far from adequate. The Masterplan seeks to merge the two and to diversify the range of activities at the location, as well as improving public transport, while introducing car park charges. This certainly would change the function of Merry Hill, however, its history is very different from that of a typical town centre in the region and we believe it will struggle to fully integrate functions. However, we believe that is the way forward and would like to see it function as a

town centre rather than an out of centre car-based retail park and we believe the current proposals offer the best way to achieve that, subject to our caveats elsewhere.

6.4 Effects on Other Centres

We are concerned about the two most vulnerable centres in the sub-region, Walsall and West Bromwich, but would also be particularly concerned about towns such as Bromsgrove and Kidderminster, Bridgnorth and Redditch. The impact on these should be included in the monitoring. This should not be seen as an introverted Black Country issue. Again there needs to be clear implications if the monitoring shows a detrimental effect.

There is also a potential for adverse impact on smaller Black Country centres such as Stourbridge and Halesowen.

6.6 Improvements to Public Transport

No, we don't think the review defines public transport improvements adequately. Previously the Metro was identified as the key element, although on its own we believe this is only one part of the solution. The new wording talks about equivalent provision, although it is unclear what this is. In our view this is too woolly and there need to be clear goals, either in terms of services or usage to ensure the stipulation on public transport has teeth and works in concert with the parking charges to reduce car use to the centre.

7.3 Retail Floorspace Growth

The retail assumptions for the Black Country need to be seen in the wider regional context. The success of the Black Country centres will be most affected by what retail growth happens in Birmingham and this is not dealt with until Phase 2. However, Phase 1 may need to comment on the relationship between the Black Country and other centres such as Birmingham if its conclusions are to be robust.

There is also a need to ensure smaller centres around the sub-region are adequately protected if expansion takes place in the sub-region.

7.5 Further Convenience Retail Investment

We do not comment on the principle of this. However, if further convenience provision guidance is given it needs to take account of the impact of any new large convenience stores on centres outside the sub-region as well as inside.