

Response of Hagley Parish Council to West Midlands Regional Spatial Strategy Revision for the Black Country.

Introduction

Hagley Parish Council is an adjacent local authority to the Black Country, lying in Bromsgrove District, Worcestershire, and having a common boundary with Stourbridge in Dudley District. As such, Hagley Parish Council has little direct interest in the plan, but is concerned that policies adopted in it should not have effects that spill over the boundary into Worcestershire. Hagley Parish Council is not an invited participant for the Examination in Public. However, it is submitting this response, in the hope that its views will be taken into account.

Matter 1

1.3 Do the policies clearly link with other RPG11 policies, and with other Regional strategies? To what extent are the policies dependent on each other for their success (i.e. operating as an integrated policy package)? Are timescales compatible and consistent?

It was a fundamental objective of RPG11 that the flow of population out of MUAs should be slowed and eventually be halted. Hagley Parish Council supports that objective. The Revision appears to conform to that fundamental objective, but care needs to be taken to ensure that sufficient land is in fact provided (and density is high enough) to ensure that the Revised Plan does result in the Black Country MUA in effect overflowing into the adjoining areas, because not enough land has been found both for housing and employment.

1.7 Does the Draft Revision pay sufficient attention to the links and relationships with adjoining areas surrounding the Black Country?

It is already the situation (due to policies adopted in the 1980s and 1990s) that considerable numbers of people commute into the Black Country for their work. This is unlikely to change. It is therefore important that there should be adequate transport links with adjacent areas. This applies to public transport as well as to highways for cars.

- The proposed Metro line 2 should improve transport links in the comparatively disadvantaged heart of the Black Country, but it is also important that this should link with its prosperous periphery, and with the area beyond. Accordingly, it is important that the Metro line 2 should eventually link with the national rail network at Stourbridge and Walsall, enabling commuters (and other travelers) coming by rail to reach the heart of the Black Country by changing from heavy to light rail.
- The Black Country is inadequately linked to the primary highway network leading to the northeast – Derby, Yorkshire and the Northeast. A major highway is needed from the northern end of M5 to link to A38 near Lichfield, avoiding many miles of slow and congested roads through Walsall.

Matter 2 Housing Provision

Hagley Parish Council is not qualified to comment in detail on these matters. It supports the strategy of the existing RPG11. Suggestions have been made that hitherto, the metropolitan boroughs have failed to complete as many new dwellings as required by RPG11. This is contrary to the fundamental objective of slowing and ultimately halting the outward migration of population. One consequence of this failure is that the housing allocation for Bromsgrove District to 2011 was largely exhausted by July 2003, when a moratorium on almost all new housing consents had to be imposed. It is therefore important the Revised Plan should ensure that the housing numbers (which are supposed to be a minimum in MUAs) should at least be met.

Matter 3 Employment land

S/3/3.1/Hagley Parish Council

3.1 Having regard to the existing guidance in RPG11, does the Draft Phase One Revision provide sufficient and necessary guidance on the location of employment land (including Employment Land Investment Corridors) in the Black Country, for example, having regard to accessibility (particularly by public transport), sustainability, Green Belt, and environmental impact?

Hagley Parish Council believes that employment land for the Black Country should be provided solely within the boundaries of its current developed area, and without encroaching on the adjacent Green Belt. A few years ago, there was pressure from a business lobby group for a road around the west of the Black Country to improve highway access to it. That proposal was ill-conceived and would (at most) benefit the prosperous periphery, rather than the deprived inner areas. There may well be a need to upgrade some existing highways, so as to remove traffic bottlenecks, and improve access to employment areas for goods traffic, but that is all.

S/3/3.2/Hagley Parish Council

3.2 Does the Draft Phase One Revision provide sufficient and necessary guidance to support and deliver the strategic objectives for employment land, and allow for a balance in the resulting mix of type and scale of sites likely to come forward within the Black Country? Is its relationship with existing guidance in RPG11 clear?

S/3/3.3/Hagley Parish Council

3.3 Is sufficient and necessary guidance provided for the transfer of surplus employment land to housing?

Hagley Parish Council has no particular view on these two matters.

- It sees no objection to small employment sites with poor transport links being converted to housing land, provided that there are sufficient larger sites.
- In view of the shift from manufacturing to service sectors, it is likely that many new employment developments will (in practice) be for offices. Planning policies should accordingly encourage the best use of land, by having high density, (meaning multi-storey) office blocks. These should only be in suitable locations, where higher buildings will not have an adverse impact on the quality of life in residential areas.

Matter 4 Transport and Accessibility

S/4/4.1/Hagley Parish Council

4.1 Does the Draft Phase One Revision provide sufficient and necessary guidance

NO. A general problem exists with the transport proposals incorporated in RPG11, that they appear only to deal with issues that ought to be resolved in the next decade or so, whereas the plan is supposed to run until 2031. RPG11 ought to have contained and revisions to it should now contain some 'blue sky' thinking, providing ideas to be implemented (or at least considered in detail) in the final decade of the plan. The difficulty of obtaining funding may mean that they can only be a long-term objectives, but as RSS is supposed to run until 2031, that should be no reason for not setting out long-term strategic targets, even if there is little prospect (for have financial reasons) of their being achievable in the near future. Since major transport infrastructure proposals frequently take over a decade to realise, the Plan should include some very long-term proposals. However, perhaps that is a matter more apposite to the phase 2 revision of the whole plan.

On:

- a. Public transport services provision and improvements (including an integrated public transport system) and linking the four strategic centres;*

The present proposal does not adequately provide for the public transport network to be integrated adequately with that beyond the Black Country. In particular, the Plan should provide for Midland Metro line 2 to be extended, to run from an interchange with heavy rail at Walsall to another at Stourbridge.

- b. The balance between modes;*

No particular view

- c. The potential for increasing freight travel by rail and waterways;*

Though the Black Country has an unrivalled canal network, it is considered that any hope of diverting goods on to it is a mere pious hope. The plan should welcome any proposal brought forward for their commercial use, but devoting resources to this would be a waste of money. Similarly with railways, the use of trains to move large quantities of bulk commodities to be welcomed, but any hope of diverting goods in smaller quantities than several hundred tons in a consignment (meaning a whole train load) is unlikely to be achievable. The possibility should be considered of providing a railhead somewhere, with a direct link to the Channel Tunnel and so to the European rail network is to be welcomed. This might enable smaller quantities of goods to be moved over much more considerable distances. However, this would require action at a more strategic level than the scope of the present proposals.

- d. The Regional context of improvements to the motorway network in the Black Country;*

There is a need for a link road from the northern end of M5 to A38 near Lichfield. This would make good the deficit in the linage between the Black Country and the area to the northeast, including Derby, Sheffield, industrial South and West Yorkshire and the Northeast generally. The present course of A38, between Birmingham and

Lichfield, is designed only to serve east and central Birmingham and does not even do that not very well; it is quite useless to the Black Country, or at least the southern part of it. The most direct route is through inner Walsall, but this is slow and congested. Another alternative is a rat-run that has to be prohibited to heavy goods traffic. A third possibility is to the west of Walsall, using M6 and A5 (or the parallel M6 Toll), but this is a long sinuous route.

e. Reducing congestion and facilitating easy accessibility in relation to transport development proposals;

There is certainly a need to undertake highway improvements to relieve the traffic congestion at bottlenecks. For example, there are often long queues on Wolverhampton New Road at its roundabout near M5 junction 2, which could be relieved by the provision of a flyover or underpass. Similarly, action is required to alleviate rush hour congestion at the Grange roundabout on A458 south of Halesowen, so that there is a couple of miles traffic travelling at a crawl up to the roundabout ceases to be a daily occurrence.

f. The role of walking and cycling as sustainable transport options?

These are certainly to be encouraged. Paths should be retained and the erection of high fences adjacent to them should be discouraged, so that they do not feel like a canyon to users. Care also needs to be taken to avoid the creation of hiding places from which robbers can jump out on passers by. The creation of long-distance through routes should be encouraged, but it is doubtful whether this warrants application of substantial resources.

Matter 5

No view is expressed.

Matter 6 Brierley Hill / Merry Hill and Dudley

S/6/6.1/Hagley Parish Council

6.1 Does the Draft Phase One Revision [having regard to the Black Country Study and the whole evidence base] sufficiently and necessarily justify the designation of Brierley Hill / Merry Hill as part of the network of strategic town and city centres in the Region?

It is (or should be) very difficult to argue that the Merry Hill Centre is not a strategic regional shopping centre, on a par with the city centres of Birmingham and Wolverhampton. On the other hand, Brierley Hill High Street is a secondary or tertiary suburban shopping area, and incapable of transformation into anything else in the short term. The idea of joining the two seems all very well in theory, but is probably impracticable because they are too far apart.

S/6/6.2/Hagley Parish Council

6.2 Is there sufficient guidance for the level of growth to be provided beyond 2016? Is it appropriate to rely on monitoring?

No view is expressed.

S/6/6.3/Hagley Parish Council

6.3 If designated a strategic town centre, will Brierley Hill / Merry Hill sufficiently fulfil the role in accordance with PPS6 tests relating to the defining / characteristic features of town centres?

Brierley Hill is merely a district shopping centre, and should therefore not be considered as part of the Town Centre. Merry Hill itself fulfils the retail role of a town centre, but not the leisure, entertainment, office, arts and other functions of town centres defined in paragraph 1.8 of PPS6. There is an element of leisure provision in the adjacent Waterfront development, but the best solution is probably for the main non-retail functions of town centres to continue to be provided by the traditional market towns (all formerly municipal boroughs) in the rest of Dudley District, namely Stourbridge, Dudley and Halesowen. To try to do otherwise would be to impose a centrally formulated structure on the area, rather than to allow the area to develop organically. This is essentially a consequence of the poly-focal nature of urban development in the Black Country. These three centres should be accorded similar status to each other. It should be noted that leisure facilities in Stourbridge have recently been doing so well that it has been necessary to prohibit the establishment of further licensed premises.

S/6/6.4/Hagley Parish Council

6.4 What would be the impact of the new designation on other centres within the sub-region and outside?

The existence of the Merry Hill Centre has inevitably attracted custom away from the centres of historic market towns such as Dudley, Stourbridge and Halesowen. This has happened already, but will be difficult (if not impossible) to reverse. Such steps

should be taken as are reasonably feasible to attempt to maintain their viability, but it is almost certain that they will continue to decline for the foreseeable future. Nevertheless, Dudley MBC's Unitary LDF should make provision for the conversion of redundant retail space to other uses. This is a process that mainly only concerns that District. It is therefore not necessary for RSS to set out any particular proposals as to what should happen to the older town centres. RSS should merely provide that the conversion of redundant retail space to other uses should be permitted.

S/6/6.5/Hagley Parish Council

6.5 Should additional guidance be provided on the greater range of facilities and retailing required to perform the function of strategic town centre and to promote regeneration?

As indicated above, Merry Hill should be regarded primarily as a retail centre, with Dudley, Halesowen and Stourbridge continuing to fulfil the other town centre functions as defined in PPS6 paragraph 1.8.

S/6/6.6/Hagley Parish Council

6.6 Does the Draft Phase One Revision adequately define the improvements to public transport, which would be necessary to satisfy national planning requirements?

No. It fails to provide for a long enough line for Midland Metro line two. See 6.1 above. Furthermore, the proposed bus corridor from Stourbridge should be expressed to be a temporary measure pending the construction of the Metro line to Stourbridge.

S/6/6.7/Hagley Parish Council

6.7 Does the Draft Phase One Revision give appropriate guidance about thresholds and conditions for further development at Brierley Hill / Merry Hill, including the proposed Area Action Plan for Brierley Hill, and how they will operate?

At present, Merry Hill is isolated from Brierley Hill by the presence of the Dudley Canal, and a considerable difference in level. If it is desired to promote development in the area between the two, a linkage in terms of communication between them will be needed.

S/6/6.8/Hagley Parish Council

6.8 What will be the effects of the removal of Dudley town centre from PA11 and its subsequent inclusion in PA10 in respect of its role in heritage and tourism?

S/6/6.9/Hagley Parish Council

6.9 Does the Draft Phase One Revision sufficiently justify and provide necessary guidance for Dudley's future role and growth?

S/6/6.10/Hagley Parish Council

6.10 Has sufficient account been taken of the full range of functions provided now and in the future by Dudley town centre and therefore does the Draft Phase One Revision

adequately recognise the necessity for complementary roles for Dudley and Brierley Hill / Merry Hill?

We are far from convinced of the merits of designating Dudley town centre as a tourist and heritage centre. It would be far better for it to be treated as a secondary town centre on a par with Stourbridge and Halesowen. This probably means that its role as a retail centre will tend to decline; that decline must be managed by allowing other land uses. This may include residential uses on the periphery of it and the other town centres, as well as promoting leisure and other town centre functions (as defined in PPS6). These functions are unlikely adequately to be provided by the major retail centre at Merry Hill.

Other Matters

Hagley Parish Council does not have the expertise to express views on these matters.