

CAPACITY OF DUDLEY CENTRES

Dudley MBC
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1. Executive Summary
2. Introduction
3. Current Position and Contextual Background
4. Opportunities within Centres - Dudley
5. The ability of Stourbridge and Halesowen Town Centres to meet the Borough's retail needs
6. Implementation of the Brierley Hill Vision, the Complementary Centres Strategy and the compatibility with National and Regional Policy.
7. Conclusions and Recommendations

WEST MIDLANDS REGIONAL ASSEMBLY – REGIONAL PLANNING BODY

This report has been prepared on behalf of the West Midlands Regional Assembly, the Regional Planning Body, as **technical advice** to **inform** the Regional Spatial Strategy Phase One Revision – Black Country Study. It is one of a suite of technical reports commissioned to inform development of spatial policy as part of Phase One Revision on West Midlands Regional Spatial Strategy.

ONE:

EXECUTIVE SUMMARY

The following document sets out that:

- Dudley Town Centre, along with the Borough's other centres, lacks the physical capacity to accommodate substantial strategic growth
- Dudley Town Centre along with the Borough's other existing town centres lack the necessary market attractiveness to enable strategic growth
- An attempt to expand the existing centres to a sufficient scale to warrant strategic status would prejudice the long established characteristics of the centres
- The Castle and Zoo in Dudley Town Centre could be utilised to enhance the attraction of the centre and to strengthen the town's established leisure and heritage role.
- Retail development of a scale to satisfy the strategic role is not required to achieve planned renaissance of Dudley Town Centre.
- The regeneration of key sites within the three centres of Dudley, Stourbridge and Halesowen are required to enable the centres to fulfil their retail-led regeneration in line with the Borough's UDP upto 2011. This will allow these centres to grow organically, in an appropriate scale and function.
- The Council is committed to the regeneration of the centres by undertaking planned regeneration of an appropriate scale, and through development initiatives (e.g. The Dudley Town Centre Master Plan, which seeks to focus regeneration and renaissance around residential development and the Borough's other centres).

TWO: INTRODUCTION

The purpose of this study is to ensure that the technical work underpinning the vision for the Black Country articulates the strategic role of Brierley Hill. It is essential that the strategy and vision is appropriately and robustly tested against the sentiments set out in national planning policy and demonstrates fully its compatibility with the objectives of the RSS and the overarching principles of sustainable development.

This paper builds on the work undertaken by GVA Grimley which identifies the broad range of retail provision needed in the Black Country. This part of the study now seeks to ensure that the network of centres within the Borough is adequately balanced taking on the sentiments of the paras 2.9 – 2.11 of PPS6. Similarly, it considers whether the recognised deficiency within the centres, as identified in the GVA study, could be addressed by strengthening existing centres, having regard to paragraphs 2.12 – 2.14 of PPS6.

The study demonstrates that the wider Brierley Hill area is best placed to perform the role of the Strategic Centres in the Borough and that this approach conforms with the objectives of the RSS and the underpinning objectives for town centres set out in PPS6. The study similarly demonstrates how the Brierley Hill Centre would function and compliment the existing network of centres.

EXISTING BOROUGH STRATEGY

The Borough's existing strategy for its town centres is set out in the recently adopted Dudley UDP, 2005 which covers the period up to 2011. The detailed policy history of Brierley Hill is complex and as a result, the Dudley UDP (2005) contains no policy references. It is not within the scope of this study to discuss the ramifications behind this reasoning, and it is suffice to say that the Council remains fully committed to the regeneration of Brierley Hill as a strategic centre for the attainment of retail-led regeneration.

Regarding the existing centres, the Council has well established strategies to deliver their planned regeneration, based upon town centre revitalisation. While being able to fulfil some enhanced retail role by the execution of the retail floorspace growth envisaged in the 2011 UDP, **Dudley town centre** will not provide the capacity or market attractiveness to play a strategic role. The regeneration of the town is articulated both by the UDP and the Dudley Town Centre Masterplan, which seeks to address the regeneration needs of the Town. The Masterplan sets out the key delivery mechanisms required to regenerate the town centre. This vision and strategy concentrates on residential-led regeneration and focusing on the town's role as a core for sub-regional tourism and leisure.

Stourbridge is a long-established town centre which has an attractive atmosphere, complemented by small shopping arcades and independent shopping establishments. Stourbridge also provides numerous high quality restaurants which are an appealing feature of the centre. The Council recognises that a new supermarket is required to draw back the lost food

expenditure in retail terms for Stourbridge. It is felt that a foodstore in the scale of 7,000 square metres is required within the existing plan period. The Plan has also allocated 4,500 square metres of comparison retail to Stourbridge. The town's image as an attractive centre offering unique retail and dining experiences is a key asset which the Council intends to build upon. The Council's future vision for the centre will be expressed in the Area Action Plan (AAP) which is scheduled to begin in 2006 as detailed in the Council's Local Development Scheme.

Halesowen is an attractive town which has a close functional relationship with its residential hinterland and with Birmingham City Centre. The centre has an allocation of 4,500 square metres of comparison retail floorspace within the existing plan period. In addition, the town will benefit in retail terms from the recent granting of planning permission for an extension to the Cornbow Shopping Centre which includes an improved comparison and convenience offer. The centre also has an AAP planned to take forward the Council's core strategy objectives.

The Black Country Study, undertaken by the four Authorities which make up the sub-region, incorporates a detailed retail capacity study which provides the context for the retail growth figures (in floorspace terms) for the Black Country. It is thus necessary within this context, that the Borough has a defined and appropriate level of floorspace dedicated for retail use. The position up to 2011 is defined by the UDP, however the position post 2011 is provided mainly within the context of the Black Country Study. This paper does not seek to make assumptions, or forecast growth, which could be translated into floorspace figures, moreover its role is to consider an acceptable broad division of growth between the Borough's centres.

In line with the sentiment expressed in para 2.9 of Planning Policy Statement 6 (Town Centres), the strategy which the Local Planning Authority is seeking to adopt would need to ensure that the network is not dominated by the largest centre and that there is an even distribution between the town centres. Also, people's everyday needs should be met on a local level. It is therefore essential that the strategy adopted by the Borough ensures that there is adequate spread of retail development across the Borough at the right scale appropriate to the each centre's role and function. For this reason, it is necessary for the towns of Stourbridge and Halesowen to make allowance for an appropriate level of growth and the retail strategy set out in the Council's Core strategy should address this. A broad capacity assessment has been undertaken to consider the likely appropriateness of the retail expansion within the towns of Stourbridge and Halesowen.

The following Table presents figures for retail floorspace (in m.sq.) which are considered acceptable.

Total	Up to 2011	2011-21	21-31	
Brierley Hill	43,000	35,000	35,000	
Dudley	15,000	10,000	10,000	
Stourbridge	4,500	5,000	5,000	
Halesowen	4,500	5,000	5,000	

Out of Centre	0	0	0	
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1. *The floorspace deals only with comparison floorspace and not convenience goods.*
2. *Lower order centres have no specific allowance provided for, as they are intended to perform a particular local retail function. Retail development with the purpose of meeting the needs of local areas, are likely to require a foodstore development. Other retail development is likely to result in the recycling of space. No accommodation for out of centre retail has been accommodated.*
3. *The above figures assume unimplemented commitments and planning consents as at 2005 which to be completed before 2011. The figures presented above are over and above the existing commitments.*
4. *Due to the time constraints in the formulation of policy for the area, the 43,000 square metres allocation between 2006-11 can be rolled forward to the next phase of the timescale should this not be feasible in the current era.*

DUDLEY'S ROLE IN THE NETWORK OF CENTRES

Dudley's role within the network of centres in the Borough, Sub-region and Region, has changed over recent years. This is due, in part, to the presence of Merry Hill acting as a shopping destination for the Sub-region. However, this is not the only factor in the changing role of Dudley Town Centre. Over recent years, other development trends have emerged which have challenged the ability of Dudley Town Centre to perform a sub-regional shopping and leisure role within the Black Country. The growth in out-of-centre retail development incorporating large format stores, has resulted in the gradual and incremental change of use to retail warehouse parks of some industrial areas and units in peripheral town localities. The national growth in large format stores has challenged many traditional town centres (particularly those with important conservation areas) as these town centres have little flexibility in their physical form to provide for the increasing size of units now required by modern retailers. The combination of the presence of Merry Hill (which offers exactly what modern retailers demand) and the inability for Dudley to respond effectively to the changing face of retail, amongst other factors, have had an effect on the way that the centre has developed in recent times and more importantly how it can evolve in the future.

Currently, Dudley as a Borough is not able to fully engage in town centre regeneration due to the lack of clarity in policy. The Borough is therefore operating its planning functions and regeneration initiatives within a vacuum of conflicting policy positions which do not fit the role of each centre. The Black Country Centre Strategy should address this issue. A complementary Centres Strategy should seek to overcome this policy vacuum through the revision of the Regional Spatial Strategy and inform the Black Country Core Strategy accordingly.

THREE: CURRENT POSITION AND CONTEXTUAL BACKGROUND

Without doubt, the main comparison retail destination (both in terms of spend and total floorspace) within the Borough is Merry Hill. Whilst in reality the presence of Merry Hill is a significant determining factor in the fortunes for all of the existing traditional centres, Dudley's position within the network and its ability to perform as a strategic centre, is affected by a number of other factors. Firstly, the physical capacity of Dudley town centre limits its ability to accommodate major redevelopment schemes which would deliver the type of development that is now required by the retail industry. The aim of this report is to explore in more detail the physical ability of Dudley Town Centre to provide major redevelopment opportunities in the future.

The boundary of Dudley Town Centre is identified within the Adopted Dudley UDP. The Plan also identifies a retail core and a protected frontage which are used for sequential test purposes. The UDP identifies Development Blocks within the Town Centre which largely reflect the medieval street patterns of the Town. Dudley shares the intrinsic architectural and urban form qualities of many fine English Market Towns. Its architectural and historical town centre core is a particular asset and a feature that the Borough Council is seeking to protect and emphasise in regeneration initiatives.

Dudley's focal point of activity is centred on Market Square and the Churchill Parade, with some peripheral activity around the Upper High Street and the Trident Centre. The market area provides a busy frontage to the High Street and in recent months new life has been injected into the town centre with the introduction of French Markets and Farmers Markets. This is a role that Dudley and the other centres are able to deliver much more appropriately than more modern shopping centres such as Merry Hill which focus on accommodating high street national retailers and chain stores. Dudley's role and the role of the other centres, has therefore become differentiated from the wider Brierley Hill area. The Brierley Hill area is made up of the traditional Brierley Hill High Street area, the Merry Hill shopping centre and the Waterfront Office area.

This paper seeks to demonstrate the contribution that existing centres can make to achieving the regeneration aims of the Black Country Study, whilst having regard to the identified need for growth, the principles of sustainable development and the objectives of promoting viability and vitality of centres. These objectives are set against the regeneration of the wider Brierley Hill area as a Strategic new town centre. Overall the paper demonstrates the appropriateness of the Complementary Centres Strategy approach.

THE EVOLUTION OF BRIERLEY HILL

Brierley Hill, as previously explained, is the one centre in the Borough which performs the most strategic role for comparison retailing. Furthermore it has been demonstrated that the centre has the physical capacity to expand and to perform as a strategic centre over the next thirty years.

Should Brierley Hill not be confirmed as a strategic centre, it is felt that Dudley Council would need to adopt a radical approach to identify redevelopment opportunities within Dudley Town Centre which would meet the floorspace requirements of modern retail developments. This, in the Council's view, would have a significant impact on the historic nature and settlement patterns of the Town. In order to understand the likely impact in more detail, this study seeks to systematically review the urban fabric within and on the edge of Dudley Town Centre. Only by undertaking a comprehensive review of the opportunities available, can the impact of major redevelopment be quantified. In addition, this review will also identify the scale of the challenge ahead if Dudley is to evolve as a key sub-regional destination in the shadow of the existing Merry Hill Centre.

After considering whether Dudley, as the most strategic centre, is able to accommodate the growth anticipated in the Sub-region up to 2031, it is necessary to consider whether the Borough's other non strategic centres would be able to accommodate that role. For this reason, Halesowen and Stourbridge have been considered as part of this study. It is not deemed appropriate to consider the capacity of the other lower order centres to meet the anticipated demand up to 2031 as they will continue to perform local roles which are not described as strategic.

The study also considers the network and hierarchy of centres within the Borough and whether there is a need to rebalance the network by adopting a balanced and phased approach. This proactive interventionist approach must be complemented by a balanced and phased approach to the real needs of in the Borough. For example, Stourbridge and Halesowen require particular intervention geared towards the targeted needs of their shoppers and based upon an assessment of the town centre vitality (for example the need for a food store or other features which may be missing from the town centre).

The study also considers the deficiencies within the network and how to strengthen the existing centres in a proactive plan led approach. The proactive encouragement of retail growth appropriate to the scale of the centre does not necessarily mean that the centres considered should have strategic centre status. Moreover, they should have specific packages of improvements planned to ensure that they meet the needs of their residents and businesses commensurate with their complimentary role in the network of centres. The study also seeks to consider the overall fit of the strategy for Brierley Hill against the objectives in the Regional Spatial Strategy.

FOUR: OPPORTUNITIES WITHIN CENTRES

DUDLEY

Dudley's main retail core is centred on Market Place, a pedestrianised area which hosts a daily market and the Churchill centre. The Flood Street/King Street site is identified as being as an area of opportunity which allows for the creation of some 15,000 square meters of comparison retail space and 7,000 square meters of convenience shopping space. Apart from this site, there are relatively few opportunities identified to reconfigure space within the central area without large scale clearance and redevelopment which would be incongruent with Dudley Town Centre's unique character and appeal. This makes it difficult for Dudley (aside from the allocation at Flood Street/King Street) to attract modern format stores which are likely to be attracted to strategic shopping centres.

An assessment of the Town Centre development Blocks has been undertaken considering their appropriateness for redevelopment, the potential for large scale clearance, the effect on the historic environment, ability to link into high street based retail regeneration and the ability to contribute to the general regeneration of the centre.

WIDER CONTEXT

It is reasonable to consider how appropriate it would be to connect the areas and blocks so as to consider whether, cumulatively, the identified blocks could accommodate the redevelopment opportunities required to meet the Borough's shopping needs. The issue arises, however, that the blocks would require redevelopment and clearance to create a format which would be attractive to retail operators. This would be out of character with Dudley Town Centre and the role that it is pursuing as a sub-regional focus for leisure and tourism based on its historical and architectural merits. Furthermore, it is essential that any development which takes place, can deliver effective linkages into the high street to support the future vitality and viability of the retail core.

Even when considering the blocks together, it is evident that, apart from the planned scheme at the Flood Street site, retail development is only likely to be achieved as part of small-scale redevelopments in keeping with the nature of the area. Whilst such developments have been accounted for in recent studies exploring the future capacity of Dudley Town Centre, it is evident that opportunities for further major retail development besides Flood Street, are limited. As highlighted above, the historic fabric of Dudley Town Centre is identified as a key asset in seeking to deliver robust urban renaissance in the future. Given that any future major retail development could significantly impact upon this asset, it is not considered appropriate to adopt a radical approach to future redevelopment within or adjoining the central core.

In addition to examining redevelopment opportunities within the existing Town Centre, it is important to consider sites/opportunities that may lie beyond current boundaries identified in the UDP.

Summary of Dudley Town Centre opportunity

Having considered the areas in a wide context it is considered that the full sequential approach has been undertaken following advice in PPS6 and in the Dudley UDP looking at the retail core, edge of the retail core and edge of centre. From this assessment it is clear that there is little opportunity over and above existing UDP commitments for retail and other town centre development. Rather, the Town will be able to adopt a sub regional role for leisure and tourism and build on its residential quality of life offer, by creating residential opportunities in the centre.

FIVE:
The ability of Stourbridge and Halesowen Town Centres to meet the Borough's retail needs

It is essential to consider the centre network and the spatial distribution across the Borough before we can be confident that Brierley Hill is the most sustainable and appropriate location for future retail provision. The potential to divide the total amount of retail usage for the Borough three ways between the three towns must be considered. One alternative would be to deliver equal retail growth across the three towns. This would, by and large, require some 200,000 square metres division of retail development between the three centres, over and above that provided by the Adopted UDP, 2005, (GVA Report, 2005)

To do this would require large scale clearance to provide space to meet the needs of the modern day retailer. With regard to Halesowen and Stourbridge this would not be appropriate and could lead to the confusion of hierarchies in the centres, leading to a potential lack of clarity on the centres strategy within the Borough. This would be out of character with the town's traditional focus. Furthermore, this is unlikely to be appropriate in providing a sustainable hierarchy and polycentric network of centres across the Black Country. It is essential to look at a holistic, proactive spatial approach to development of centres within the Borough recognising that a sophisticated complementary centres strategy must be achieved.

The towns of Stourbridge and Halesowen offer opportunity for regeneration and renewal centred around their physical characteristics and spatial position within the hierarchy. Opportunity exists in certain areas within the towns for some small scale retail development and indeed an allocation exists within each town designated by the UDP for 4,500 Sqm of comparison retail development up to 2011. In the long term, small-scale clearance and redevelopment of sites may well be appropriate and this would indeed be welcomed by the Council. However, their historical fabric would prohibit large expansion of a scale appropriate to meet the needs of the Borough's shopping needs up to 2031 akin to that of a strategic centre. However, development of a scale appropriate to meet the needs of the centres themselves will be appropriate and an allowance post 2011 must be made to ensure the longevity and long term sustainability of the centres as detailed in previous section.

The development of the centres will be catalysed by the Borough's master-planning process, which are scheduled in the Borough's Local Development Scheme. Halesowen Area Action Plan (AAP) has a completion date of 2011, and Stourbridge AAP a completion date of 2008. These are being pursued as Area Action Plans so they can effect land designation changes and can be guided by the core strategy for the Borough post completion of the BCS.

**SIX:
IMPLEMENTATION OF THE BRIERLEY HILL VISION, THE
COMPLEMENTARY CENTRES STRATEGY AND COMPATABILITY WITH
NATIONAL AND REGIONAL POLICY.**

The Masterplan for Brierley Hill is an expression of the Council's ambition for the area. The planning aspirations for the wider area are based upon the potential for new build development to support a more diverse and intense pattern of land use and to provide new and improved connections across the area to facilitate access, movement and integration, new public spaces, intensification of car parking and environmental improvements.

The Masterplan assumes comprehensive redevelopment of a significant scale. The long term aspiration is to reconfigure and integrate Merry Hill into surrounding areas by the reconfiguration of land used for car parking and the redevelopment of surrounding land adjoining the traditional high street of Brierley Hill linking the Merry Hill centre within the Waterfront and the traditional high street. There exist significant areas of land that are developable for town centre uses (leisure, offices, food and drink along side retail and residential) can contribute to regeneration of the wider area.

The development of the centre as a whole is dependant on retail growth. This is required to fund the required significant environmental and public transport infrastructure improvements. There is a need for a comprehensive plan to achieve good quality design/fabric to create an integrated and regenerated centre. The present layout and use of land is inefficient and fails to meet the needs of the community. Retail development is the primary feature in enabling the regeneration of the centres. There exists within the context of Brierley Hill, a realistic implementation package capable of delivering planned improvements to manage the centre alongside private commitment to ensure delivery.

It is essential that the overall Borough strategy is set within the context of the Government's wider policy objectives for retail strategies for centres. The strategy for the Borough focusses on the Government's objectives to promote social inclusion, ensuring that communities have access to a range of main town centre uses and remedying deficiencies within networks.

Furthermore, by focusing retail development (and other town centre uses which can have commercial benefit and thus become a driver for economic and regenerative benefits) within Brierley Hill area, ensures that the retail development is strictly controlled and ensures that the retail development creates additional benefits. This development will encourage investment in areas of deprivation in need of regeneration, and will create additional employment opportunities and an improved physical environment. The comprehensive development of the Brierley Hill area includes a substantial amount of development (in excess of 1,000 new homes and some 40,000 of retail development). These objectives underpin the strategy for the Brierley Hill area and a planned and managed approach to development in the centre will ensure that this takes place in an equitable manner, not at the expense of the Borough's other towns or at the expense of the Towns elsewhere in the Black country.

The regenerative benefits accrued by confirming Brierley Hill as a Town centre will aid in the promotion of the economic growth of regional, Sub regional and local economies. It will ensure, via mechanisms of phasing, and preconditions, that more sustainable patterns of development are delivered and ensuring that locations are fully exploited through high density, mixed use development. The promotion of a number of sustainable transport choices including (but not exclusively) the planned Metro line extension, and other public transport (initiatives including reducing the need to travel and providing alternatives to car use the patterns of travel) within, across and into the Black Country will be proactively managed in a way that will ensure that the Black Country offers real choice and opportunity.

The Borough's strategy for promoting strategic and planned growth of all centres of a scale appropriate to themselves and in a balanced manner, will ensure a compatible centre strategy. It will also ensure that the centre can deliver the strategy at a local level appropriate to meet each town's needs so to reduce unnecessary transport impacts. This also allows a balanced approach to regeneration and renewal and provides opportunities to attract funding.

Promotion of high quality and inclusive design will aid to improving the quality of the public realm and open spaces, protect and enhance the architectural and historic heritage of centres, provide a sense of place and a focus for the community and for civic activity and ensure that town centres provide an attractive accessible and safe environment for business, shoppers and residents.

The Regional Spatial Strategy (RSS) and National Planning Guidance

The overall strategy for promoting Brierley Hill as a Strategic Centre, Dudley as a principal town centre with a sub-regional focus for leisure and tourism and Stourbridge and Halesowen as Town Centres, must be assessed against the principles of the Regional Spatial Strategy.

The RSS vision encompasses a strategy where there are complementary opportunities for all to progress and improve their quality of life; where there are diverse and distinctive towns; where communities are recognised for their distinctive high quality natural and built environment; and, where there are integrated transport facilities which meet the needs of communities. The RSS seeks to create positive measures to address the relative decline of the Regional Economy. The Black Country Centres Strategy should seek to deliver this by ensuring that a vision is achieved by targeted policy mechanisms. The Complementary Centres Strategy fulfils this objective. It is a proactive mechanism which places an emphasis on proactive town centre development and will create opportunities to allow positive measures in addressing the decline of centres. The RSS vision and guiding principles seek to ensure that the strategies adopted are sensitive to local requirements and to promote development which enables new economic activity where it can deliver environmental benefits in areas of need.

The strategy of confirming Brierley Hill in a planned fashion which can deliver regenerative benefits both within the confines of the immediate area, and also

within the other centres in the region, meets this objective. Furthermore, the RSS states that the RPB will identify demonstration projects which will illustrate the development of high quality environments and illustrating that clearance and redevelopment in some areas may be required to achieve that vision. In allowing Brierley Hill to fulfil its potential it will allow the Black Country to demonstrate a new and thriving identity based on prosperity and opportunity meeting regeneration objectives and needs.

The strategy promoted for Dudley Town Centre is supported directly by *Policy CF1: Housing within the Major Urban Areas* of the RSS. Dudley's role in attracting and focusing on high quality residential development can demonstrate a clear link with the fourth objective of this policy which seeks to attract action for renewal and redevelopment in the neighbourhoods including Dudley. There are specific and measurable policy linkages which are supportive of the Borough Council's policy emphasis on creating Dudley as a sub regional focus for leisure and tourism activity. *Policy PA10: Tourism and Culture*, recognises that the Black Country heritage attractions are assets of the Region which must be supported. Similarly the RSS recognises that the Black Country was formed by the merging of towns and that people strongly identify with their local town. The sense of identity and belonging needs to be celebrated within the Black Country. The complementary Centres Strategy fulfils this identity issue. There is also an emerging identity for the new town centre. This is based on fostering opportunity and renewal and seizing opportunities offered by the private sector to encourage the creation of urban renewal and physical improvement that spreads the benefit across the wider Black Country.

The strategy of promoting the Complementary Centres Approach ensures that the centres in the Borough fulfil the Government objectives as set out in PPS6 of promoting the vitality and viability of all the centres and creating positive and planned improvements. Furthermore, the complementary centres approach aids in enhancing consumer choice by ensuring that all centres have roles to play so there is a spatial spread of centre activity across the Borough, focused on Brierley Hill, Dudley, Stourbridge and Halesowen all playing different roles within the complex and interdependent network. The strategy similarly ensures that sustainable patterns of development exist by focusing development of a scale appropriate to each centre. Thus, by increasing the residential opportunity within the centres, this allows for sustainable patterns of development and ensures that the Borough's towns are exploited through high density development in appropriate locations to aid in their regeneration. The Complementary Centres Strategy depends on an appropriate package to deliver public transport initiatives and improving accessibility.

SEVEN: CONCLUSION AND RECOMMENDATIONS

The strategy of promoting and encouraging growth appropriate to the scale of each centre is essential. This meets the government's objectives in terms of strengthening the existing centres as set out in Planning Policy Statement 6. The balancing of the network that will be achieved by ensuring that Brierley Hill performs as the Borough's Strategic Centre, the promotion of Dudley as the Principal centre with a sub-regional foci role for leisure and tourism along with promoting the enhancement and celebration of the diversity of the other two centres in the Borough, will allow each centre to perform at an appropriate level to meet their deficiencies in terms of needs. This strategy performs well with the regional objectives of seizing opportunity for all to progress and improve the renaissance of distinctive cities and towns where high quality centres can deliver benefits in areas of need.

A proactive and managed approach to development in each centre is essential not only in delivering the improvements in the lower order centres, but also in ensuring that there is a joint commitment to progressing plans for the benefit the wider Black Country, by ensuring that the centres with opportunity are able to progress and demonstrate the success of the Black Country centres. This Complementary Centres Strategy approach adopted by the Council, will also aid in the minimisation of detrimental impact on the other centres within the Borough and the Sub-region..

By confirming Brierley Hill as a Strategic Centre, it will enhance consumer choice making provision for a range of shopping and leisure provision in a centre where there is real physical capacity and market reality of it being achieved. Similarly allowing the proper and appropriate scale of growth at Dudley, Halesowen and Stourbridge will allow genuine choice to meet the needs of the entire community and for the centres to maintain their market share.

The confirmation of the centre as a Strategic Centre will allow real opportunity for the Metro extension to be provided, allow an incentive for the existing Merry Hill Centre to have strict parking controls and improve choice of transport within the hinterland of the centre.

Indeed, by the confirmation of Brierley Hill as a Strategic Centre, it will allow the comprehensive development strategy to be fully exploited by the execution of a high-density, mixed use development.

In confirmation with paragraph 2.53 in Planning Policy Statement 6, it is clear that the need for the centre has been established both in floorspace terms and in spatial distribution terms. Similarly, the centre would be created in an area of significant growth as defined by paragraph 2.53 of PPS6. The Black Country Study is a visionary implementation strategy which helps to deliver the fundamental principles embodied in the 2004 Regional Spatial Strategy. Clearly, there is a deficiency in the existing network of centres demonstrated by the clear need of shopping floorspace in the GVA Black Country Retail Centres Report. In addition to this, the centre is clearly an area of deprivation demonstrated by a domination of excluded groups. Similarly, the continuation

of the centre as a Strategic Centre would provide transport infrastructure to broaden the Black Country's choice of travel modes. Indeed, PPS6 specifically advocates the creation of new centres where the need for them has been demonstrated, Para 2.53 of the Statement states "*New Centres should be designated through the planning making process where the need for them has been established*".

It is apparent that the confirmation of the centre would clearly meet the criteria set out in PPS6. It is therefore fully reasonable to assume that the above considerations, coupled with the knowledge that the confirmation of the centre will have little impact on the Borough's other centres, demonstrates the ample expenditure, capacity and planned improvement of centres in the Black Country. This work demonstrates clearly that Dudley is not able to perform a strategic role. Complementing this work, are a number of other key pieces of work that present a comprehensive technical background.