

Sub-Matter 5C

Statement on behalf of West Midlands Planning & Transportation Sub-Committee

- 1 The Sub-Committee supports the statements submitted by the Regional Assembly on Matter 5 and wishes to make only limited additions to its own December 2008 submission on this matter.

(i) **Network of Town and City Centre**

What is the rationale for and significance of the tiered network of centres set out in Policy PA11?

How does the classification of centres relate to other policies of the RSS, such as Settlements of Significant Development? Should the classification of any centres be changed?

- 2 The Sub-Committee supports Policy PA11 but seeks clarification of the hierarchy's role and purpose(s).
- 3 The addition of Brierley Hill in place of Dudley (established through the Phase 1 Revision) is strongly supported.

(ii) **Retail**

Are the floor space allocations in Policy PA12A realistic and achievable and appropriate to the RSS?

Is the guidance for non-strategic centres clear and consistent with other RSS policies and national guidance? Are the 10,000 sq. m. threshold and accompanying requirements reasonable?

Does Policy PA13 on out-of-town retail add anything to national policy in PPS6?

- 4 The Sub-Committee supports the comparison retail floorspace requirements in Policy PA12A for the defined strategic centres and the underpinning approach. It requests support that any deviation from these requirements needs to be thoroughly justified (paragraph 7.68). It is considered that this crucial point should be included within the Policy itself, as this is more appropriate than its current status as just part of the supporting text.
- 5 Attention is drawn to the fact that the figures will need to change in the event that material changes are made to the population within the catchment areas.

- 6 In the light of the above, attention is drawn to the fact that there could be pressure for out of centre retail development if growth takes place within the catchment area of a centre which has development capacity constraints, and that this would be contrary to Policy PA11.

(iii) **Offices**

Are the office floorspace allocations in Policy PA13A realistic and soundly based?

Is the requirement to plan for construction of this floorspace within or on the edge of town centres reasonable, or does the policy need more flexibility to deal with local circumstances?

- 7 The Sub-Committee supports the focus on strategic centres as primary locations, but seeks clarification of the hierarchy's role and purpose.
- 8 Attention is drawn to the fact that redistribution of population could lead to over or undersupply of office floorspace in certain locations. In the former case, this could lead to additional pressures for out of centre development.
- 9 The Sub-Committee seeks clarification as to how the 65%:35% in centre/out of centre split will be implemented and monitored.
- 10 Delivery of speculative office development, especially in the short and medium terms, may be an issue in the light of changed economic circumstances.
- 11 In order to support Urban Renaissance objectives, overprovision should not be made outside the MUAs. Provision should be minima within the MUAs and maxima outside, to reflect this. Any deviation from this must be justified, and this should be reflected in the policy itself, rather than in the supporting text.

Does Policy PA13B take an appropriate approach to office development outside strategic centres?

- 12 The Sub-Committee supports the additional guidance provided by the Policy and supports the provision within the Policy that limits B1a office development within general employment land allocations.
- 13 Further clarification is sought to distinguish between provision for offices in non strategic centres and out of centre locations, and also clarification of the position regarding office uses within RIS.

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