

## **Proposed Changes to Policies CEN1-8 suggested by Peel Holdings [91] submitted for Matter 11 Hearing, Thursday 15<sup>th</sup> July, 2010**

Peel Holdings [91] have submitted a track-changed document making comments and suggesting changes to Policies CEN1-8 which supersede the proposed changes contained in Appendix 8 of their original written submissions, which were submitted by 15<sup>th</sup> June 2010. These changes relate to the Joint Core Strategy track-changed document which was requested by the Inspectors at the Pre-Hearing Meeting on 25<sup>th</sup> May 2010, was submitted to the Programme Officer by the Black Country Authorities on 4<sup>th</sup> June 2010, and was placed on the Joint Core Strategy website by 7<sup>th</sup> June 2010.

During the Matter 11 Hearing on Thursday 15<sup>th</sup> July the Black Country Authorities agreed to consider these changes, provide a response, and discuss them with the Inspector during the hearings on Wednesday 21<sup>st</sup> July.

### **Specific Changes**

Having considered the track-changed document submitted by Peel, the Black Country Authorities suggest the following changes:

- Policy CEN3, second sentence below Table 15:

~~“The vast majority of convenience floorspace will~~ is expected to be delivered by existing commitments”

- Policy CEN7, suggested changes from eighth paragraph onwards regarding repetition of PPS4:

We do not feel that any changes are necessary, but are happy for the Inspector to decide whether these changes unnecessarily repeat national policy and should be removed. If text is removed, we suggest that a short explanatory paragraph is inserted which says, for example:

“The supporting information, determination and conditions of planning applications in out-of-centre locations will need to comply with the requirements of relevant national planning policies.”

- Para 4.58, propose deletion of the paragraph.

~~It is not considered that there is any quantitative or qualitative requirement for out-of-centre development, except to meet particular specific small scale local day to day needs within walking distance as outlined in Policy CEN6.~~

We disagree with the reasoning suggested by Peel for the change, but agree to the proposed deletion as the paragraph is considered to repeat para 4.57.

The Black Country Authorities do not feel that any other changes suggested by Peel are necessary or would be sound, for the reasons set out in the Matter 11 Hearing, and are happy to discuss these in more detail on Wednesday 21<sup>st</sup> July.