

20 July 2010

**Delivered by Post**

Mr N Payne (EIP Inspector)  
Programme Officer  
c/o Melanie Owen-Roberts  
Black Country Core Strategy  
14 Little Parks  
Holt  
Wiltshire, BA14 6QR

Dear Mr Payne

**BLACK COUNTRY CORE STRATEGY, ISSUE 11, CENTRES/RETAIL (GENERAL)  
SUGGESTED CHANGES BY PEEL INVESTMENTS**

Thank you for the opportunity to comments on suggested changes put forward by NJL Consulting on behalf of Peel Investments in respect of Issue 11 'Centres/Retail' (General).

We note NLP Consulting's grave concerns regarding the soundness of the strategy in respect of planning for and accommodating retail growth, in particular food retail.

Our client LCP has hitherto raised no objections in respect of the quantum of floorspace proposed either in respect of comparison goods as defined in the Regional Spatial Strategy or convenience goods as set out within the Core Strategy (itself supported by the GVA Black Country Centres Study, November 2009). Its fundamental concern has largely related to the phasing of any growth and its connectivity with the established retail core – as evidence by its representations to the New Summer Row Compulsory Purchase Order Inquiry.

Notwithstanding the above, we would support a number of the observations made by NJL Consulting (many of which are uncontroversial). We would comment specifically on the following:

- **Policy CEN3:** Comparison Shopping Provision – We would support the suggestion that the policy is too prescriptive. The figures themselves are lifted from the RSS, which also states that *“the floor space requirements set out in this policy should be treated as specific to each centre and should not normally be exceeded”* (para 7.68, our underlining). The subsequent panel report commented on the relative merits of identified increments and the fact that the figures are not broken down beyond 2006-2021 and 2021-2026. We would concur that the actual provision in strategic centres inevitable occurs in substantial increments over significant time periods (given complex site assembly issues and market considerations) and therefore the Core Strategy should not be so prescriptive as to preclude applications prior to 2016. New Summer Row is testament to this.

- **Policy CEN7:** The suggestion is that any proposal for a town centre use that cannot be accommodated within the town centre should be directed in the first instance to the regeneration corridors. The basic premise of this alteration is sound i.e. ensuring that the regeneration zones are the focus for investment. However it assumes that accessibility is equal across the regeneration zone. We would expect to see some consideration in the policy of the accessibility of the individual site within the relevant regeneration zone.

We trust these brief comments are useful.

Yours sincerely



**David Smith**

cc: Steve Carlin

London and Cambridge Properties