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**From:** John Shephard [jrs@jjdesign.org.uk]  
**Sent:** Monday 2 October 2006  
**To:** statement@northwesteip.co.uk  
**Subject:** Brethren's Gospel Trusts/RESP530/Matter 1C

Please find attached our Written Statement for Matter 1C.

Kind regards  
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RESPONDENT NO. 530  
MATTER 1C

DRAFT REGIONAL SPATIAL STRATEGY FOR THE NORTH WEST  
EXAMINATION IN PUBLIC - PARTICIPANTS WRITTEN STATEMENT

MATTER 1C - ASSUMPTIONS UNDERPINNING THE DRAFT RSS

1. ISSUE (i) Are the economic assumptions (including growth and activity rates) in draft RSS appropriate and achievable?
  - 1.1 Brethren's Gospel Trusts do not have the technical expertise to contribute helpfully to this issue. However, we recognise the over-riding importance of rigorous examination of the economic assumptions in the draft RSS.
  - 1.2 In particular, we recognise the important linkages between economic growth and activity and a healthy population and robust environment, as highlighted in the SA (paragraph 5.4.3).
  - 1.3 Conversely, we would be concerned if over pessimistic assumptions on environmental limits of the Region were to suppress economic assumptions and hence threaten effective renaissance, addressing social inclusion and deprivation.
2. ISSUE (ii) Are the assumptions about population change in draft RSS appropriate?
  - 2.1 Again, Brethren's Gospel Trusts do not have the technical expertise to contribute helpfully to this issue. No objections have been raised by Brethren's Gospel Trusts regarding the overall population change assumptions.
  - 2.2 Nonetheless, we recognise the importance of a robust examination of this issue and would be concerned if challenges result in an overall reduction in housing provision which would be counter-productive to building truly sustainable communities and a strong, healthy and just society.
3. ISSUE (iii) Are the economic, population and other assumptions consistent between the regional and sub-regional policies in the draft RSS?
  - 3.1 Brethren's Gospel trusts have not challenged the consistency of RSS policies in these terms.
  - 3.2 Nonetheless, we do understand and share the concerns expressed by various respondents regarding the impact of the RSS policies at the regional and sub-regional level and we consider that the complexity of the RSS and potential inconsistencies at the sub-regional level may well prove to be unhelpful at LDD stage in a number of key locations.
  - 3.3 In particular, we note and share concerns regarding the economic,

population and other assumptions for non city region centres including Crewe, Chester, Preston, Lancaster and Carlisle for instance. We urge the Panel to ensure that greater clarity on the future role of these centres is provided in the RSS.

4. ISSUE (iv) Are the national and regional constraints on development clearly articulated? Are the development proposals consistent with Green Belt, flood risk policies and other constraints such as transport, water supply and sewerage infrastructure?
  - 4.1 PPS11 paragraph 1.7 (CD:PP11) indicates that RSS must have regard to national policies but not simply repeat them. It should also be locationally but not site specific, while not going into detail more appropriate to an LDD. There is therefore a higher level at which the RSS should articulate the national and regional constraints.
  - 4.2 Having re-examined the draft RSS and in comparison with RPG13, we conclude that the national and regional development constraints are not clearly articulated. This is likely to be of concern to a variety of stakeholders and cause difficulties at LDD level. We suggest a series of maps to supplement the Key Diagram, with appropriate textual support. Diagram 11.1 is noted but is limited to Biodiversity Resources and fails to identify important constraints such as Ramsar sites and SPA(s).
  - 4.3 We have no issue with the consistency of development proposals with Green Belt, flood risk policies and other constraints. However, we acknowledge the importance of the sub-issue and recognise that the Panel will need to resolve the viewpoints of a wide variety of stakeholders. We concur with the view of GONW that a strategic flood risk assessment and identification of principal flood risk areas of regional significance would be helpful. Carlisle is a case in point. Similarly, the Plan should indicate any Green Belt reviews which may be necessary at LDD level.