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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 1E

Please find attached our Written Statement for Matter 1E.

Kind regards  
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**RESPONDENT NO. 530**  
**MATTER 1E**

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

**MATTER 1E - SUSTAINABILITY**

**1. ISSUE (i) Are the SA and SEA robust?**

1.1 We consider that overall the SA/SEA is reasonably robust. It has been prepared by experienced and respected authors. In particular, the SA has considered the key issues arising from the current situation in the Region (the baseline). These include:

- economic inclusion;
- population
- communities
- health and well being
- education
- the growing number of older adults and a high number of unfit or vacant homes;
- disparities between ethnic communities unemployment levels and high youth unemployment
- general poor health and poor life expectancy in parts of Greater Manchester, Merseyside and East Lancashire
- high level of unqualified people.

1.2 The SA has also considered two alternative scenarios for the RSS together with options at sub-regional level. The findings of these appraisals have informed the RSS process. This accords with national guidance (GEN20).

1.3 Having said that, we have fundamental concerns, which other stakeholders appear to share, that the SA findings should have been better incorporated into the RSS, with greater clarity and wider outcomes. In fact, we submit that there are a number of social issues which are not clearly reflected in the RSS, despite being identified in the SA.

1.4 The SA/SEA process is based on the aims set out at PPS11 para 2.37 (PP11) based on:

- social progress which recognises the needs of everyone;
- effective protection of the environment;
- the prudent use of natural resources; and
- maintenance of high and stable levels of economic growth and employment.

It is recognised that these aims are interdependent and sustainable development must be approached in a holistic manner. This message is reaffirmed in the UK SDS at page 17 (GEN10).

1.5 We were therefore concerned to learn from the response at the Sustainability Appraisal Technical Seminar that the SA process failed to effectively consider the needs of faith communities or the economic contribution of faith communities; despite two reports from NWDA:

- a. Faith in England's Northwest : NWDA : November 2003;
- b. Faith in England's Northwest : Economic Impact Assessment : NWDA : February 2005

Copies of both documents have been placed in the EIP library, together with a Summary leaflet.

1.6 For all these reasons, we conclude that although the SA/SEA is reasonably robust, there are omissions in the process and in the extent to which the SA/SEA has influenced the RSS especially in social matters, which are an important component in "truly sustainable communities". Paragraph 5.4.1 of the SA/SEA comments on the lack of community recognition throughout the RSS.

2. **ISSUE (ii) Does the draft RSS achieve the right balance between economic growth, social inclusion, including equality and diversity issues and environmental protection/enhancement?**

2.1 We submit that the draft RSS fails to achieve the right balance between economic, social and environmental matters. In particular, the draft RSS is weak in social inclusion, including equality and diversity issues.

2.2 This is considered to be a significant weakness of the draft RSS having due regard to the national aims for sustainable development which are restated in the UK SDS (GEN10), together with the diverse character of the region, including dense urban, rural and coastal communities with their own distinctive traditions. Moreover, serious deprivation is evident in both urban and rural areas, with social, health, employment and education indicators giving rise to real issues. The national importance of these issues is reflected in the terms of reference and structure of DCLG (see "Building the Department of Communication and Local Government").

2.3 We would draw attention to the comments made by the NWDA Chief Executive in his forward to the Faith EIA (February 2005), where he states:

**"There are strategic decision makers at regional and local level who have yet to take seriously the contribution made by faith communities to the economic life of the Northwest."**

We concur with that view and respectfully submit that faith communities provide an important contribution to social cohesion, social inclusion and to quality of life, including physical, mental and spiritual well being of people throughout the region.

2.4 For these reasons, we submit that the draft RSS should give all eight key components of Sustainable Communities equal and balanced emphasis. We also believe that the plan should give a clear lead in effective community engagement and address the specific needs of an ageing population. A greater emphasis on diversity and equality issues is also needed to provide a greater focus at LDD level.

2.5 We submit that faith communities and other voluntary and not for profit

community organisations need space to operate in the form of new places of worship and/or community halls. Growing communities and an ageing population will also place greater demands on Cemeteries, for which space is needed, within the community. A clear positive spatial policy framework is required to ensure that these issues are addressed at LDD level. Cemetery provision and associated management issues are currently under review at government level, partly in response to concerns about new forms of burial including 'Green Burials' which have been pioneered within the North West Region.

2.6 We therefore ask the Panel to make appropriate recommendations in respect of these matters, in the interest of the people of the region.

3. **ISSUE (iii) Do the proposals in the draft RSS sufficiently provide for tackling climate change and mitigating for its impact?**

3.1 Brethren's Gospel Trusts do not raise any issue regarding climate change and impact mitigation and do not have the expertise to contribute to this issue in detail. However, we acknowledge that sustained climatic trends will raise a number of challenges and concerns but also provide new opportunities.

3.2 At a strategic level, we would submit that greater emphasis on the principles for sustainable development and for sustainable communities as set out in UK SDS (GEN10) will improve the contribution of the draft RSS to tackling climate change.

3.3 Delivery of sustainable buildings and energy and water efficiencies form important components of national strategy and should be stressed in the draft RSS, together with the existing components of Policy DP1 in the draft plan.

4. **ISSUE (iv) Does the draft RSS provide a framework that can meet the aim of reducing the need to travel?**

4.1 The aim to reduce the need to travel is enshrined in national policy. Delivery of the aim is more elusive, especially given a tradition of a mobile population and especially in the Northwest region, the attractions of the coast or rural uplands, including the Lake District, as areas in which to live, whilst working in one of the three city regions.

4.2 The objective of Policy DP1 to ensure that all new development is genuinely accessible by public transport, walking and cycling will assist. However, we submit that delivery of adequate housing allocations in areas in which people wish to live, together with adequate allocations for employment sites will also provide a framework in which a reduction of the need to travel can be achieved. Real improvements in local public transport, an imaginative mix of land uses and improved local facilities for shopping, leisure and community uses, together with quality open space including "green infrastructure", will assist in the national aim.

4.3 However, we respectfully conclude that behavioural patterns will take time to change; possibly  $1\frac{1}{2}$  generations. Within this context we believe that the draft RSS is providing an adequate framework. Other stakeholders may seek more detailed measures, but the Panel will wish to consider this issue from a high-level perspective rather than in detail.