

Respondent No.
506/568
Matters 1A-1B

**Draft Regional Spatial Strategy
for the North West
Examination in Public**

**Matter 1: Vision, Objectives and
Overall Approach**

**Written Statement on Matters
1A-1B**

**On behalf of
The North West Development
Consortium and Paycause Ltd**

October 2006

Matter 1A: Vision and Objectives

(i) Are the overall vision and objectives in the draft RSS appropriate and do they adequately cover the characteristics and issues of the whole region?

1. The North West Development Consortium (NWDC) and Paycause Ltd consider the Vision for the North West is confusing and would benefit from greater elucidation. The first four paragraphs contain information that would be better incorporated within Section 2. The actual aspirations for the North West are outlined only in the last two paragraphs but we consider that insufficient attention is given to the different contributions that different parts of the region will make and the outcomes that are envisaged. For example:

- the second to last paragraph does not say enough about the sub regions and rural areas outside the three City Regions, the importance of securing economic growth and diversification in these locations and the contribution they too can make to overall regional growth.
- the same paragraph refers specifically to Manchester and Liverpool but does not mention other parts of their respective City Regions and conversely refers to the Central Lancashire City Region without mentioning Preston's role as a key driver of city regional growth.

2. The objectives listed under paragraph 4.2 of draft RSS do not adequately cover all the issues that need to be addressed to secure regional aspirations for growth. In particular, there should be a much more explicit reference to housing and the importance attached to ensuring that sufficient homes are provided to meet housing market requirements, to support economic growth and secure more sustainable communities. This would give added weight to the statement in Paragraph 5.5 (under the heading 'Living in the North West') that *'the fundamental premise of the Plan is that meeting the region's expectations for economic growth will entail a significant increase in the amount of additional housing required'*.

3. In terms of the objectives of policies and priorities in the Regional Transport Strategy it is considered that sub-section 2) could be improved by reference to the need to improve linkages to neighbouring regions and administrative areas, including particularly North East Wales.
4. More generally, the stated emphasis in the Plan (paragraph 5.1) to steering development to the most sustainable locations **within** the region's cities, towns and other settlements is too narrow in its approach to how sustainable development can be achieved. There may well be circumstances, for example, adjoining certain rural settlements, where the development of a directly adjoining site could help to sustain and support the local community in both social and economic terms. Similarly, it is clear that sustainable Greenfield land releases will be necessary to meet housing requirements in some areas and to support economic growth objectives. Paragraph 5.1 should acknowledge that there will be circumstances where land adjoining existing settlement boundaries may also deliver a sustainable outcome, by adding the words '*or adjoining*' after '*within*'.
5. Whilst supporting a housing market approach to housing and the delivery of the right housing mix, we are concerned that paragraph 5.7 specifically identifies stock management and renewal and provision for local needs and affordable housing as key elements of this objective but makes no reference to the importance of providing good quality market housing as well. The need for a high quality and diverse housing stock is fundamental to securing the region's expectations for economic growth and should provide for all elements of the market.

Matter 1B: Spatial Principles

- (i) Does the draft RSS set out the right underlying principles for spatial planning in the region?**
- (ii) Are the different elements of DP1 clearly stated and how will they be monitored?**

1. NWDC and Paycause Ltd consider that Policy DP1 lacks a spatial dimension that links the regional development principles to the vision and objectives of RSS. The principles, as defined, do not provide the flexibility to deal with the different characteristics of different parts of the region. This could prevent the delivery of sustainable and pragmatic planning solutions that would enable all parts of the region to contribute towards sustainable economic growth and sustainable communities to be secured in both urban and rural areas. We consider that Policy DP1 should be augmented by reference to improved and sustainable economic growth and the development of sustainable communities that lie at the heart of the overall vision of draft RSS and also reflect the key aims of the Northern Way and the Regional Economic Strategy. This would assist in creating better linkages between the application of the principles and the outcomes that RSS seeks to achieve.
2. It is unclear as to what is meant by the term 'environmental social and economic capital' (first bullet point) or by the statement that 'development...should not result in a net loss of any of the key benefits and services' (second bullet point) and how these principles will be implemented in plans and strategies. Further clarification is needed within RSS about intended application.

(iii) Is the sequential approach to DP1 appropriate?

3. The sequential approach in DP1 is inappropriate, for the following reasons:
 - it does not accord with either PPG3 or draft PPS3 which do not make a distinction between previously developed land and existing buildings;
 - the retention and re-use of existing buildings will not always represent the most efficient development solution; in circumstances where buildings are no longer fit for purpose, obsolescent or of low value, redevelopment may be the most appropriate option and make better and more efficient use of a site. For

example, this could assist in contributing to housing land supply where other options are very limited or assist in releasing value to enable an existing employment user to relocate to a more suitable site or more modern and efficient premises;

- greater flexibility is needed to achieve the optimum solution for each site and to deliver the sustainable development objectives that RSS seeks;
- the sequential approach in PPG3 is not carried through into draft PPS3; the latter gives greater emphasis to the consideration of developable sites that are suitable, available and viable with a focus on deliverability to ensure requirements are met. A more integrated approach is called for that allows for sustainable Greenfield sites to be incorporated into LDFs, if necessary to meet housing targets.

4. The requirement that plans and strategies should ensure that all new development is genuinely accessible by public transport, walking and cycling creates difficulties in many rural areas where a fragmented settlement pattern means that there may be difficulties in meeting this criteria. However, this should not rule out development on the basis that it is not sustainable enough.
5. Appropriate development within or adjoining both Key Service Centres and smaller local centres can fulfil an important role in maintaining thriving and sustainable rural communities. The recently published Affordable Rural Housing Commission report observes that the interpretation of sustainable development within the planning system has often worked against the interests of smaller rural communities. It recommends that sustainable development should be sought in rural communities as well as urban ones and recommends a review of the sustainable development criteria used to appraise emerging Regional Spatial Strategies.
6. NWDC considers that the third bullet point in the sequential sequence should define 'other land' as being within or adjoining settlement boundaries where development would be sustainable, able to contribute to the wider objectives of supporting economic growth, regeneration and the creation of thriving communities and compliant with other policy requirements.