

**Respondent Nos.
506/568
Matters 2A - 2B**

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

Matter 2: Spatial Strategy

**Written Statement on Matters
2A-2B**

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

October 2006

Matter 2A: Overall Spatial Strategy

(i) Does the draft RSS sufficiently express a spatial strategy that addresses the region's priorities for growth, regeneration and investment? Does Policy RDF1 provide sufficient detail on the spatial priorities for main development locations?

1. Although generally supportive of the intention to maximise growth opportunities presented by the three City Regions, the particular focus on the two Regional Centres of Manchester /Salford and Liverpool gives cause for concern given their very narrow geographical definition (as outlined in footnotes to Policies MCR2 and LCR 2). There is no recognition of the importance or the economic potential and role of other places within and across the three city regions that also have a key contribution to make towards securing regional sustainable economic growth and/or regeneration.
2. For example, Policy RDF1 makes no reference to Preston that RES identifies as a key driver of city–regional growth, along with Manchester and Liverpool. Furthermore, it does not align with Policy MCR3 that gives particular prominence to promoting economic growth to the southern part of the Manchester City Region where a number of key growth drivers, including Manchester airport, create major opportunities.
3. From the perspective of the North West Development Consortium and Paycause Ltd, the objectives of RSS can only be achieved in full by all parts of the region pulling their weight and we believe this calls for a more balanced polycentric spatial development strategy. Related to this, we consider that development in Regional Towns and Cities in City Regions may well have an important role to play in securing urban regeneration and economic growth for the benefit of that particular locality. It should therefore be acceptable in its own right without needing to demonstrate that it is complementary to the Regional Centres, as Policy RDF 1 currently implies.
4. We consider that Policy RDF1 should make reference to the role of Key Service Centres. In rural areas, such as Cumbria, which have a fragmented and sparse settlement pattern, the Key Service Centres fulfil a crucial role in providing for a range of services and access to housing, education and employment opportunities for their own

populations and their surrounding rural hinterlands. They have a fundamental role to play in helping rural communities to thrive and in assisting wider rural regeneration. Within their own geographical context, they perform the role of main development locations and Policy RDF1 should acknowledge this.

(ii) Do the thematic policies and sub regional policies amount to a consistent and coherent regional strategy?

5. We regard the linkages between the thematic policies and sub regional policies as not always easy to follow and have drawn attention above to examples of inconsistency.

Is the Key Diagram fit for purpose and do the Sub-regional diagrams add value?

6. NWDC and Paycause Ltd consider that the Key Diagram is confusing, difficult to understand and does not convey the key spatial elements of the strategy in a visually compelling way. We note the light yellow shading that appears to extend into North Wales but has no obvious notation in the key and is not shown on the sub-regional diagram. In our statements to Matter 8, we highlight concerns that RSS does not sufficiently take account of the inter linkages between West Cheshire and North East Wales despite assertion at paragraph 13.12 of RSS that the policy framework for Chester and Ellesmere Port have been informed by the draft sub-regional strategy that has been prepared for this cross border area. We consider that both the Key Diagram and the sub regional diagram for the Liverpool City Region should clearly highlight this inter-relationship.
7. We believe that all the sub-regional diagrams add very little value as drawn and fail to show spatial inter-relationships between places. They should be redrawn in a more visually informative way.

Matter 2B: City Regions

(i) Does the City Region approach adequately address the different pressures and needs of the various parts of the region or are there alternative sub-regional approaches, which better reflect these needs and pressures?

1. NWDC and Paycause Ltd assume that the City Region approach draws from the Northern Way Strategy which identifies Manchester/Salford, Liverpool and Central Lancashire City Regions on the basis that they incorporate the majority of assets and growth potential in the North West. Whilst this is undoubtedly the case, we have concern that the focus given in RSS to City Regions effectively down plays the pressures and needs of other parts of the region that lie beyond. Terminology does not help. Cumbria, for example, is referred to as an 'area' in Chapter 15 within which there are 'sub-areas' – these terms reduce the significance of the County which functions as an important sub-regional entity in its own right and has its own unique pressures and challenges.
2. Within the context of the Liverpool City Region, we have concern that the policy direction for West Cheshire in Policy LCR1 is couched solely within the context of development needing to be complementary to Liverpool City Centre, the Inner Area and the northern part of the City Region despite acknowledgement of the close functional interrelationship between West Cheshire and North East Wales in text.
3. Over the last three years, a great deal of time and effort has been vested in the preparation of a Draft West Cheshire and North East Wales Sub Regional Spatial Strategy. As a cross-border, collaborative study, its key purpose has been to assess development requirements for the sub-region as a functional spatial entity to enable the sub-region to overcome policy tensions and move forward in a more co-ordinated and balanced way. Paragraph 13.12 of draft RSS indicates that the Sub Regional Strategy has informed the policy framework for Chester and Ellesmere Port and that further refinement of policy in RSS may be required when the Sub Regional strategy is agreed. However, the City Region approach seeks to assert linkages between West Cheshire and the City Region that in reality are very considerably weaker than the socio-economic connections that exist between West Cheshire and North East Wales. It therefore does

not address the particular pressures and needs that are apparent in this part of the region, especially in relation to Chester itself.

4. NWDC and Paycause Ltd consider that a cross border sub-regional strategy should be formally recognised in policy terms as a more appropriate approach to addressing needs and pressures than is achievable through the current Liverpool City Region approach and its stated priorities.
5. The geographical extent of the City Regions and their component areas require further clarification. There is considerable reliance upon the use of footnotes to give spatial definition but these are not consistently clear. We consider that there is a need for greater geographical transparency within policy and text in the main body of RSS, and also in City Region diagrams.
6. In terms of the question of whether there should be greater clarity about the broad scale of development that City Regions should accommodate, we are not convinced that any attempt to aggregate or re-assemble figures to City Region level would assist delivery, which is ultimately the main objective. There are also overlaps between City Regions as in the case of Warrington, whilst Chester, for example, should arguably not be a part of the Liverpool City Region at all.
7. The housing figures, for example, are currently presented by way of district clusters as a proxy for housing markets pending further work on housing market assessment in the future. Draft PPS3 emphasises the importance of Sub-Regional housing market and land availability assessments and that local planning authorities should work together where two or more authorities form one housing market area. We would anticipate that this work will form a key input to ongoing monitoring and assessment of RSS policy performance and implementation. We consider that it is through these exercises that a more detailed understanding of housing markets will emerge. In the meantime, the housing figures should preferably continue to be presented for each local authority area, as the primary delivery vehicle. There is no purpose served in a City Region wide aggregation.

(ii) Are the City Regions to be treated as being equal or is there a hierarchy?

8. It is clear that there is a hierarchy whereby Manchester/Salford and Liverpool are accorded greater weight than the Central Lancashire City Region. Whilst CLCR has a different spatial profile to the conurbations of Manchester and Liverpool, NWDC consider that the opportunities that the latter presents to contribute significantly to overall regional economic growth should not be down played.