

Respondent No.
506/568
Matters 2C – 2D

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

Matter 2: Spatial Strategy

Written Statement on Matters 2C – 2D

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

October 2006

Matter 2C: Locations for Development

(i.) Is the evidence base for Table 7.1 sound? Should the proposed settlement hierarchy be reassessed, and should a consistent approach be adopted towards the identification of Key Service Centres?

1. NWDC and Paycause Ltd have concerns about the soundness of the evidence base underpinning Table 7.1. The hierarchy, as shown, appears inconsistent, in part, with the thrust of other policies in draft RSS and does not include all the places within which Policy RDF1 says the main development locations are to be found. The rationale is unclear.
2. We consider that the settlement hierarchy should be re-assessed to reflect the following:
 - Manchester/Salford are shown as Regional Centres but it clear from the footnote to Policy MCR2 that the geographical area covered by this definition is very narrowly defined. In consequence, there are substantial parts of Manchester and Salford that fall outside the definition, including the Inner Areas (that also include part of Trafford) identified in Policy MCR2 and a part of the southern part of the Manchester City Region, as identified in Policy MCR3.
 - A new separate column entitled Regional Cities should be created to reflect the status of Preston, as a key driver of city regional economic growth, Chester as a driving force in the sub-regional economy with a national and international role and Carlisle, reflecting the City's significant potential to attract development into Cumbria.
 - Kendal should be redefined as a regional town rather than as a key service centre to reflect its location as the southern gateway to Cumbria and the economic driver (with scope for improvement and growth) for South and East Lakeland.
 - Sandbach should be included within the Manchester City Region category of Key Service Centres rather than in South Cheshire, where it is currently shown. Its present categorisation is inconsistent with Table 9.1 (Distribution of Housing Provision) which shows Congleton district as a part of the Southern Manchester/North East Cheshire cluster and with paragraph 9.19 (c) which

recognises that development within the district should take place within the context of the economic and social linkages with the rest of the Manchester City Region.

3. It is apparent from footnote 1 to Table 7.1 that the Key Service Centres within the three shire counties have been identified on the basis of differing criteria through the three County Structure Plans and range in size from a minimum population of 1,500 (within Cumbria and the Lake District) through to 70,000. We note that further research is intended on the role of these centres to allow general criteria to be established for their identification. However, whilst recognising the potential benefits from this approach, we consider that the role and function of Key Service Centres (KSCs) will inevitably differ in terms of whether they have a rural, suburban or metropolitan location. During the interim, Policy RDF2 defines a limited generic range of criteria for defining KSCs in the metropolitan areas outside the shires but also requests a review of KSCs in the shire counties against the same criteria. We do not support this approach.
 4. In particular, the criteria do not include reference to the key role that rural KSCs can fulfil in providing access to housing and employment opportunities for their own populations and their surrounding hinterlands or their potential to secure development that can help rural communities to thrive and /or assist in diversifying the rural economy. In a nutshell, we consider there are pitfalls in trying to impose a 'one size fits all' approach.
- (ii) When, and in what circumstances will there be a need for a review of the Green Belt?**
5. Policy RDF5 anticipates that there is no need for exceptional substantial strategic change to the Green Belt before 2011 and that the need for exceptional change should be investigated by strategic studies after 2011 with a view to informing future reviews of RSS and subsequent reviews at the local level. This timescale prompts concern. It could mean that the ability to effect strategic change at the local level could not be realised until 2015 or beyond, particularly if the timing and results of any strategic study do not coincide with the next review of RSS but the one after that.
 6. Given the time lapse between such work being undertaken and the ability to make change on the ground, NWDC and Paycause Ltd consider that a strategic review of green

belt boundaries should be instigated before 2011 in order to ensure that sufficient land is available to meet development requirements arising after 2011. Any further delay increases the prospect, in some areas, of insufficient land coming forward in adequate time to allow development targets to be realised and this could undermine the ability to optimise regional economic growth opportunities and secure sustainable patterns of development.

7. We consider that a study of the need for review of the green belt should form a part of the evidence base of every review of RSS. The circumstances in which we consider a review is necessary are where existing commitments and opportunities within settlements are unlikely to be of sufficient quantity or quality to deliver the scale of development required or to attract the level and type of investment needed to achieve improved regional economic performance.
8. Within the Liverpool City Region, for example, the earlier 2004 Merseyside study was based upon development requirements in current RSS13 which the latest 2003-based household projections and the economic transformational agenda for the sub-region now show to be significantly underestimated. The tightness of the green belt restricts the ability to secure sustainable development patterns and essential economic growth opportunities
9. For example, we consider that there is a particular need for a review of the green belt around Chester in order to secure the necessary opportunities for more housing and employment development in sustainable locations that will allow Chester to optimise its role as a driving force within its sub regional economy. Whilst development opportunities on brownfield sites within the inner areas of Chester may be expected to continue during the short term, it is now apparent that land will certainly be needed in the medium term in order to ensure that requirements are met.
10. For this reason, we are fully supportive of the acknowledged need for change to green belt boundaries to the south west of Chester in supporting text to Policy RDF5 at paragraph 7.21. The potential boundary changes are linked to the need to continue to attract high value knowledge based industries to the City and to develop the linkages with North East Wales. This derives from the West Cheshire North East Wales Sub Regional Spatial Strategy that identifies the need for a new premier business park in

Chester and defines the south west part of the City as offering the best prospects for meeting the appropriate credentials.

11. NWDC and Paycause Ltd believe that there are opportunities in the south west of Chester to provide for sustainable mixed- use development, including housing, which would support economic growth in a location that would not prejudice the setting of the city.
12. Elsewhere, we consider that the policy stance in respect of Warrington is unrealistic. Existing green belt boundaries should be reviewed before 2021 having regard to the important economic role that the town fulfils, its pivotal locational advantages and the need to secure a sustainable development pattern.

Matter 2D: Rural Issues

(i) Are rural issues, including the development needs of small towns, adequately addressed in the draft RSS?

1. We consider that draft RSS, and in particular Policy RDF3, takes too narrow a view of the challenges and opportunities that the Region's rural areas present.
2. In rural areas such as Cumbria, where the settlement pattern is very fragmented, Key Service Centres should not be the only places where development should be focussed. The policy should also acknowledge the role that Local Service Centres can fulfil in sustaining small rural communities and should refer to the need to locate smaller scale development in these settlements to help sustain local services, provide access to housing and support local businesses.
3. The policy should recognise the ability to secure sustainable development within both categories of settlement. As written, Policy RDF3 uses the term 'sustainable' only in relation to 'supporting sustainable agriculture'. 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 on the grounds that because they have already lost some of their services, they are intrinsically unsustainable. 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. For these reasons, we consider that Policy RDF3 should be more up front in acknowledging the contribution that both Key Service Centres and smaller local centres can make in achieving sustainable development in the interests of securing thriving and vibrant rural communities.
4. More generally, the policy suggests a preference for the 'status quo'. The initial bullet points setting out what plans and strategies should achieve, do not articulate any commitment to growth that may be needed to secure thriving and vibrant communities and do not make reference to housing. The ability to foster a healthy rural economy and to sustain local services is dependent upon retaining and potentially increasing the local population by ensuring that sufficient homes are provided to enable people of all

backgrounds to live there. An additional bullet point should therefore be added that requires plans and strategies to take account of the role of housing in securing economic regeneration and providing support for wider service provision within rural areas.

5. As an added but related point, NWDC consider that the policy should acknowledge the possibility that land adjoining Key Service Centres or smaller local centres may be required to meet the development needs of the local community where this can contribute to a sustainable pattern of development. The adopted Cumbria and Lake District Joint Structure Plan indicates (paragraph 2.7) that 'some Greenfield development within, or as an extension of service centres may be necessary and boundaries should be drawn to include such areas within the settlement'. We consider that RSS should retain this policy provision.