

WRITTEN STATEMENT TO NORTH WEST REGIONAL SPATIAL STRATEGY  
EXAMINATION IN PUBLIC  
ON BEHALF OF PENSYCOR LIMITED

---

**MATTER 2C: LOCATIONS FOR DEVELOPMENT**

- 1) **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?**

The list of Key Service Centres contained in Table 7.1 of the draft RSS is derived from a collaboration of settlements identified in County Structure Plans to be superseded by the draft RSS (see footnote 1 to Table 7.1). As a result, the selection of Service Centres is based on different functions depending on their location. In Cheshire it is based on a distinct retail or leisure function, in Lancashire transport, employment and services.

In order to apply draft Policy RDF2 in a consistent manner, the definition of Key Service Centres should be applied uniformly across the region. This requires a comprehensive review of all Key Service Centres identified through the Structure Plans and other settlements within the region which could now be considered for Key Service Centre status, to ensure an up-to-date list of settlements is identified to meet the development objectives of the RSS.

The wording of the draft Policy RDF2 suggests Plans and strategies within the Cheshire, Cumbria and Lancashire areas should review the list of Key Service Centres against the criteria of the policy. This approach runs contrary to the terms of PPS11 "Regional Spatial Strategies" which require Local Development Documents to be prepared in general conformity with the RSS as the strategic component of the Development Plan. Local Development Frameworks should be led by the principles of the RSS and therefore these should be firmly established at the outset and subject to change only through revisions to the RSS. The identification of additional Key Service Centres through the LDF process could place LDFs out of conformity with the RSS, raising questions of policy soundness. It is therefore critical that Policy RDF2

WRITTEN STATEMENT TO NORTH WEST REGIONAL SPATIAL STRATEGY  
EXAMINATION IN PUBLIC  
ON BEHALF OF PENSYCOR LIMITED

---

and Table 7.1 present an up-to-date list of Key Service Centres in accordance with a regional definition.

A comprehensive review of Key Service Centres should be undertaken as part of the RSS to provide:

- a) a regional definition of Key Service Centres; and
- b) a definitive list of Key Service Centres in Table 7.1.

2) **When, and in what circumstances will there be a need for a review of the Green Belt?**

The draft RSS acknowledges the need for a strategic review of the Green Belt within Cheshire, Greater Manchester, Lancashire and Merseyside before 2011 to ensure adequate land is available to meet long term development needs in these parts of the region. However, Policy RDF5 makes no provision for a review of the Green Belt to be undertaken through this version of the RSS. Indeed, the policy states, ***“the findings will inform future reviews of RSS and subsequent reviews of plans and strategies”*** (RPS emphasis).

PPG2 advocates adopting a longer term vision to Green Belt boundaries, extending beyond current Plan periods. Up-to-date boundaries are essential to provide certainty for future development options. Boundaries should be drawn to endure and offer a degree of permanence for the protection of land.

The Regional Assembly should be satisfied that the Green Belt boundaries are capable of accommodating the development needs of the region throughout the Plan period of the draft RSS and beyond, ie post 2021. However, the draft policy does not intend to revise the Green Belt boundaries, with reliance placed on timely review of the RSS. The draft RSS is unlikely to be finalised until late 2007, following a 2½ year preparation process. To

WRITTEN STATEMENT TO NORTH WEST REGIONAL SPATIAL STRATEGY  
EXAMINATION IN PUBLIC  
ON BEHALF OF PENSYCOR LIMITED

---

ensure review of the RSS by 2011, work would need to commence almost immediately following its adoption. Any delay in the preparation of the RSS review would have serious implications for a review of the Green Belt and the delivery of new housing and employment required to meet the objectives of the current draft RSS. Strategic Review of Green Belt boundaries involve extensive studies of the role and function of land within the Green Belt and adequate time must be allowed for such work to be undertaken.

In addition, it is unclear how the objectives of the RSS will be shown to be deliverable throughout the Plan period without adequate land available. A strategic review of the Green Belt is critical to ensure adequate land is available to deliver new development in a sustainable manner, in accordance with other policies of the RSS.

The Regional Assembly should be satisfied that the Green Belt boundaries are capable of accommodating the development needs of the region beyond the Plan period. However, in this case, the Regional Assembly acknowledges the boundaries of the Green Belt would not even accommodate the full needs of the region within the Plan period to 2021. Policy RDF5 acknowledges insufficient land will be available within the latter phase of the RSS (2011–2021) to accommodate development in Cheshire, Greater Manchester, Lancashire and Merseyside without strategic land releases from the Green Belt. It is therefore essential to include provision within Policy RDF5 for a comprehensive strategic review of the Green Belt now in order to identify adequate land to meet the needs of the region through the Plan period and beyond.

The RSS and specifically Policy RDF5 should be modified to require a full review of the Green Belt by the Regional Assembly through this version of the

**WRITTEN STATEMENT TO NORTH WEST REGIONAL SPATIAL STRATEGY  
EXAMINATION IN PUBLIC  
ON BEHALF OF PENSYCOR LIMITED**

---

RSS to provide for the longer term development requirements of the region extending beyond 2021.