

## **1A: Vision and Objectives**

### **1A(i)**

- 1.1 The vision is supported but its presentation could be improved. It would be better if the vision:
- were combined with Chapter 4 and placed after the considerations that have shaped the vision (Chapters 2 and 3);
  - avoided its description of the Region in 2006 and instead concentrated on setting out what kind of place the North West should be in 2021 (as in the latter part of the text in draft RSS page 2, "By 2021 ...");
  - had a better geographic balance and articulated more fully a vision for the areas beyond the two metropolitan areas. The characteristics of the Region and issues that need to be addressed are described in Chapter 2 but many of these do not seem to have influenced the vision or objectives;
  - had a greater emphasis on the Region's natural and historic environment and its contribution to defining the uniqueness of the North West and quality of life. There needs to be a balance in the vision between development and managing environmental assets.
- 1.2 The vision should be supported by a set of measurable headline outcomes, each with a quantified target.

### **1A(ii)**

- 1.3 The Strategy has a strong economic bias. This may be understandable given the wealth-creation gap that exists between the Northern Regions and the South East. While this approach provides a common thread and a strong theme through much of RSS it does create problems. In particular:
- it could be regarded as a high-risk strategy. Tables 9.1 (Housing), 8.4 (Retailing) and 8.2 (Employment Land) are predicated on faster growth and it is unclear how patterns of development will be controlled if economic growth fails to materialise and the quantified amounts of development are not required;
  - in this high growth strategy the interrelationships between development and accessibility are unclear. Paragraph 5.1 of RSS appears to accept future increases in journey-to-work, pollution and congestion. This is not clear in the objectives (paragraph 4.2) and is at variance with Policy DP1;
  - the Strategy pays insufficient regard to the protection of the Region's environmental assets, and to the social and economic needs of rural areas. Chapters 7 and 11 do not directly address the future protection of statutorily designated areas and sites.

## **1B: Spatial Principles**

### **1B(i)**

- 1.4 In general terms Policy DP1 is considered to set out the right underlying principles for spatial planning in the Region, though various suggestions for improvements are set out below in paragraphs 1.5-1.7.

### **1B(ii)**

- 1.5 The first bullet of Policy DP1 needs redrafting to clarify what the phrase ‘there is a presumption against any harm arising from development’ means.
- 1.6 It is not immediately clear how Policy DP1 will be implemented. It may be helpful to include key targets within the policy, such as the proportion of new development on previously developed land, reducing CO<sup>2</sup> emissions etc. It is noted that Appendix B of the Implementation Plan links many targets to Policy DP1, however, these do not appear to adequately cover the regional development principles of ensuring quality development (also refer to the County Council’s statement for Matter 11B regarding monitoring).

### **1B(iii)**

- 1.7 The sequential approach needs to be amended to a ‘sustainable locations first’ rather than a ‘brownfield locations first’ approach. This revised approach is needed for Central Lancashire City Region (CLCR) (and may be appropriate elsewhere) because:
- not all brownfield sites are in sustainable locations; some greenfield sites may be better located;
  - it allows development to be located where it can take maximum advantage of its proximity to services and infrastructure. This is of key importance in achieving a “critical mass” for the major centres in terms of transport and service provision, and also offers significant benefits in reducing the need to travel; and
  - it emphasises the scope of brownfield sites within the urban area to be put to the best possible use (which may not always be ‘hard’ development) in support of wider objectives including the “transformational agendas” of the Market Renewal Pathfinders.
- 1.8 The Sustainability Appraisal carried out for the First Detailed Proposals for CLCR supports this view and demonstrates that the overall balance of economic, social and environmental effects of this strategy is the most sustainable for the City Region.