

## **1C: Assumptions Underpinning the Draft RSS**

### **1C(i)**

1.9 The County Council does not have a view on this matter.

### **1C(ii)**

1.10 The Submitted Draft RSS uses the 1996-based household projections, which were the most recently available information during the preparation of RSS. These projections have since been superseded by 2003-based household projections published by ONS in March 2006. It would be appropriate to consider the impact of this new information during the EIP.

### **1C(iii)**

1.11 The Submitted Draft RSS appears to use a consistent evidence base for information, although different scenarios have been used for different sub-regions for employment land calculations. The County Council does not object to this approach in principle.

### **1C(iv)**

1.12 The Submitted Draft RSS does not contain a clear statement on where these constraints are or what the implications are in terms of their role in shaping future patterns of development. A map or maps showing the location and extent of strategic constraints and their various designations, including green belts, would be useful.

1.13 The Submitted Draft RSS recognises that there are constraints on the regional highway and public transport networks, particularly related to congestion and overcrowding, e.g. in paragraphs 10.1 and 10.9. This is also stated in the Technical Appendix such as in paragraph 5.15. It would, however, be helpful if the following issues were addressed:

- Key areas suffering from congestion on the Regional Highway and Public Transport networks were shown in map form;
- How transport constraints were addressed in Policy RT8/Table 10.2, i.e. is there a causal link between transport constraints and proposed improvements?

## **1D: Overall Approach**

### **1D(i)**

1.14 The County Council is aware that the NWRA has produced draft RSS in consultation with the NWDA, Regional Housing Board and GONW. This close working relationship is referred to in each of the other regional strategies. Further detail on the key priorities of RES and RHS would help to provide a clearer context for RSS. The document would be strengthened if the impact of the Regional Funding Allocations process on implementation of regional policy were more explicitly addressed. For example, no indication is given as to how the lower than desired

Housing Market Renewal funding (see paragraphs 4.2 and 4.3 of 'Regional Funding Allocations: the Advice of the North west Region (January 2006)) will impact on housing delivery through draft RSS.

1.15 The close alignment can be seen in a number of policies such as RDF1, W2, RT3, RT4, Table 10.2 of RT8, L2, L3 and L5. The detailed analysis of policies and actions in Table 3.1 of the Technical Appendix is welcomed. However, alignment would be more clearly demonstrated if some deficiencies were addressed:

- The employment and sub-regional policies in RSS fail to address the importance of linking employment allocations to the integrated economic plans for these areas (e.g. RES Action 47).
- The importance of employment creation near areas of need (Actions 52 and 83) is poorly articulated while the importance of sub-regionally important employment sites (Action 82) is not addressed, especially within the sub-regional elements of draft RSS.
- It would be valuable if the Draft Implementation Framework were amended to include a table demonstrating key synergies between policies in RSS and those in other Regional documents.

#### **1D(ii)**

1.16 Submitted Draft RSS reflects Northern Way as far as it can. It is mentioned in RSS paragraphs 3.8 and 3.9 as part of the context of RSS. Northern Way is seeking to reduce the 'productivity gap' between the north and south of England provides an important context for the economic emphasis of draft RSS. However, RSS should not over-rely on Northern Way to provide a strategic context. RSS is meant to set out a long-term and robust spatial strategy for the future development of the North West in the next 15/20 years. Northern Way's policy status has not been formally tested its longevity is unclear.

1.17 The main influence of Northern Way has been the introduction of the City Region concept to policy making. This has been taken up and developed in draft RSS. RSS Part 4 sits alongside Northern Way's City Region Development Programmes (CRDPs). It could be argued that this relationship is poorly articulated in draft RSS and that linkages to sub-regional programmes prepared by Economic Partnerships require further exploration. These linkages could, for example, be expressed more explicitly in the Implementation Framework. However, a distinction needs to be maintained between a long-term robust spatial strategy and short-term economic strategies, and the former also needs to set out the balance between economic, social and environmental considerations.

**1D(iii)**

- 1.18 Guidance in PPS11 (paragraph 10 Annex B) indicates that the development of a coherent set of strategic objectives is essential to the preparation of RTS policies. Latest DfT guidance on preparing RTS published in July 2006 indicates the importance of developing RTS objectives that relate to the broader spatial strategy. It is, however, unclear from this national guidance whether RTS objectives should be discrete or integrated within RSS.
- 1.19 As currently set out in Chapter 4 the broad objectives of RSS and the priorities of RTS read as two separate lists. RSS contains only one specific transport objective while the RTS list is much more detailed and, in part, presents solutions and implementation strategies rather than objectives. There would be value in producing one consolidated list that draws out spatial principles including the importance of accessibility. There should be an explicit mechanism that links objectives, policies and implementation.