

## 2A: Overall Spatial Strategy

### 2A(i)

- 2.1 There is no clear description of the spatial strategy in draft RSS. Chapter 5 almost does this but unfortunately some elements of the strategy are omitted while the Chapter also contains material that belongs elsewhere.
- 2.2 Elements of Chapter 5 are objectives and some of them are quantified (paragraphs 5.6 and 5.15). These could be transferred to Chapter 4. Other parts of Chapter 5 serve only to act as introductions to subsequent chapters. These would be better transferred to those chapters to give the Plan a more logical flow and avoid the impression of overlap and repetition.
- 2.3 The remainder of Chapter 5 could then be reordered to give a succinct description of the spatial strategy. In particular, paragraph 5.2 needs to be expanded and combined with paragraph 5.11 and parts of paragraph 5.3 need to more clearly set out the roles of the Region's towns and cities with regard to economic growth, regeneration and accessibility to services.
- 2.4 Some parts of the description of strategy need to be expanded, in particular:
- what is going to happen, in terms of when and where, in the Housing Market Renewal Pathfinder Areas;
  - descriptions of the locations, role and purpose of the Region's green belts and the various designations and locations of environmental protection areas. These need to be included in the Key Diagram;
  - role and future growth of airports and ports and how access to them will be improved to the benefit of the whole Region;
  - role and priorities for each city region and connectivity between and within city regions.
- 2.5 Policy RDF1 is an important policy but is trying to do too much. It introduces the City region concept and other sub-regions in a policy titled "Main Development Locations" and then goes on to cross refer to Table 7.1 (Settlement Hierarchy) through part of that hierarchy is dealt with in RDF2. A better approach might be a suite of shorter policies, each dealing with a particular aspect:
- City regions and sub-regions: definition, purpose and the priorities for each, with a cross-reference to more detailed policies set out in Part 4.
  - Regional Centres
  - Regional Towns and Cities
  - Key Service Centres
- } Each policy should set out the role, including transport and accessibility, of the settlements included in that level of the hierarchy.

- 2.6 There is a particular issue with regard to the definition of settlements in Table 7.1. It is unclear whether 'Blackburn', 'Blackpool', 'Burnley', 'Preston' and 'Lancaster' refer to local government units, or the built-up urban area within each unit or the full extent of the urban area which sometimes extends beyond the District Council boundary. The County Council suggests that the latter option is preferable. A map showing District boundaries and settlement boundaries in Lancashire is attached to this statement.
- 2.7 Table 7.1 omits some significant settlements in Lancashire. It is assumed that Fleetwood and Thornton Cleveleys are included in 'Blackpool' and Morecambe and Heysham in 'Lancaster'; otherwise they will need to be listed as Key Service Centres. This level of extra detail could possibly be handled in the Sub-Regional Policy frameworks. District Councils will be able to offer advice on the settlement hierarchy and definition of settlements during the debate on Matter 9 (and Matters 8 and 10 for those parts of Lancashire outside the Central Lancashire City Region).

#### **2A(ii)**

- 2.8 Consistency and coherence of the regional strategy could be improved. There are a number of concerns:
- Chapters 8-11 contain a mixture of "place-specific" policies and generic or thematic topic-based policies that apply everywhere. As a result, although Chapter 7 is titled 'Regional Spatial Framework', key geographic elements of the strategy lie elsewhere, e.g. Policy W1, Table 8.1, Policy W5, Policy EM4. There is a case for moving these into Chapter 7, for example, the priorities in Policy W1 could be included in a city region/sub-region policy in Chapter 7.
  - The purpose of the sub-regional strategies is unclear. The reasons for including sub-regional policies are set out in PPS11 paragraph 1.13. Yet draft RSS contains more detail on places in its general policies than in the sub-regional policies. Much of the Sub-Regional Policy Framework lies elsewhere in RSS outside Part 4 and a lot of the detail that is only relevant to particular areas could be transferred to the sub-regional strategies (e.g. Key Service Centres' list in Table 7.1).
  - The 'spatial building blocks' vary from policy to policy and topic to topic. The city regions and sub-regions used in Part 4 are not used elsewhere in the Strategy, e.g. Tables 8.1, 8.2, 8.3, 8.4, 9.1, 10.2, 11.7a, 11.7b. Whilst the policy advice in paragraph 1.14 of PPS11 is recognised, the interchanging between the two is considered to reduce the coherence of the strategy. A more consistent approach is recommended.
  - There needs to be a consistent relationship between Table 7.1, Policy W5 and Policy LCR3. Skelmersdale is included as a Regional Town in Table 7.1 and Policy LCR3 but is not included in Policy W5. Runcorn, Widnes and Bootle are included in LCR3, none are listed in W5, and two out of three are in Table 7.1.

## **2A(iii)**

- 2.9 The County Council recognises the five key barriers to accessing services set out in the Social Exclusion Unit report “Making the Connections: Final Report on Transport and Social Exclusion”. The Department for Transport encourages Transport Authorities to develop proposals to break down these barriers with their Accessibility Strategies submitted with Local Transport Plans. The RSS does not go far enough in aiming to reinforce this approach at a wider regional level.
- 2.10 The Institute of Transport Studies at University of Leeds did research on Accessibility in draft RSS for NWRA (Final Report May 2006). This concluded that further work should be undertaken on developing regional criteria for measuring accessibility of new development and for application of parking standards. Lancashire County Council concurs with this finding and suggests draft RSS for Yorkshire and Humber Policy T3 as providing a possible model for such an approach.
- 2.11 The spatial strategy provides a number of references to accessibility, for example in Policies DP1, L1 and RT7. What it fails to do is to provide a consistent regional framework for defining what accessibility is and how it will be measured and to provide guidance on this for LDFs. Also, RSS does not demonstrate that it meets the requirements of PPS11 Annex B paragraph 18 in that there is no clear evidence that accessibility has been taken into account in key elements of the Spatial Strategy. This could be remedied by redrafting RSS to contain:
- A specific policy, or an adjustment to Policy DP1, giving sufficient priority to Accessibility and Social Inclusion issues to ensure that considerations of accessibility to development are safeguarded across the Region;
  - A clear statement of the role of towns and cities in each level of the settlement hierarchy as public transport nodes on the Region’s transport networks;
  - A remodelled town centre policy covering land uses and development beyond retailing and leisure;
  - Making more explicit the criteria used for the selection of new employment sites to demonstrate the importance of accessibility by non-car modes by the potential workforce.

## **2A(iv)**

- 2.12 The County Council has no objection to the omission of Regeneration Priority Areas, as they are no longer a component of the Regional Economic Strategy.

## **2A(v)**

- 2.13 The Key Diagram is considered to be deficient with respect to areas requiring particular environmental protection.

- 2.14 It is considered that the use of sub-regional diagrams is potentially useful. However, the CLCR Diagram is inadequate and adds little value in its current state. Proposed improvements are outlined in the County Council's Statement for Matter 9.
- 2.15 It is also a matter of concern that the Key Diagram does not clarify whether Tarleton/Hesketh Bank is part of the Liverpool City Region or the Central Lancashire City Region. This issue is referred to under Matter 8A(i).

## **2B: City Regions**

### **2B(i)**

- 2.16 The City Region approach reflects 'Northern Way' and it is difficult to see RSS using a different geography. However, other approaches are available, such as using the five county areas as sub-regions. The City Region approach allows the concept of these areas being the engines for growth in the Region to be articulated in spatial terms and the County Council supports this. However, there are problems. Not all parts of the North West lie within a City Region. RSS does not clearly identify a different role for the "non-city region areas".
- 2.17 In the City Regions, there are issues beyond urban economic growth that are not fully addressed: the environmental dimension and the needs of rural areas. These pressures and needs are not fully addressed in either the regional or sub-regional policy frameworks.
- 2.18 There should be greater clarity about the geographic extent of the three City Regions. The situation for West Lancashire is particularly confusing. It is not clear whether the whole District is included in Liverpool City Region or whether the northern part of the District is regarded as part of CLCR. Boundaries need to be shown on the sub-regional diagrams. Clarity is also hindered by the use of other sub-regional boundaries throughout the document (see paragraph 2.8, third bullet, of this statement).
- 2.19 As a result, there are no clear statements about the broad scale of development to be accommodated in each City Region. There are no city region figures in many of the tables (see paragraph 2.8 of this Statement).
- 2.20 An inconsistent approach is applied to Cumbria and North Lancashire with employment land allocations in Policy W3 sub-dividing this region into North Lancashire and Cumbria, thus adding an additional sub-region to that identified in the spatial framework.
- 2.21 The strategy fails to address the relationship between the City Regions and other areas and the interdependence between them. Many strategically important assets in Lancashire lie outside the CLCR: Lancaster University, the Lancaster/Heysham/Morecambe urban area, Heysham port. Important environmental areas such as the Bowland AONB lie on both sides of the boundary. Lancaster District has strong links with South Lakeland in Cumbria yet, although outside the CLCR boundary, continues to have important functional links with CLCR.

**2B(ii)**

- 2.22 Table 7.1 sets out a settlement hierarchy, not a city region hierarchy. The City Regions do, however, have different strengths and characteristics and may serve different functions. RSS needs to set out (either at paragraph 5.15 or in Chapter 7, with an appropriate policy) the functions of each city region and the priorities for each but without establishing a hierarchy.
- 2.23 It is clear that the Manchester City Region (or, more likely, the city centre/South Manchester/Manchester Airport area) has an important and particular role to play in the future economic development of the North West. If the remainder of the Region is to benefit from this growth, then the key will be improved connectivity to Manchester from elsewhere. Considerations such as these could be used to outline a regional-specific spatial strategy for the North West.