

**Respondent Nos.
506/568
Matters 8A - 8B**

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

Matter 8: Liverpool City Region

Written Statement on Matter 8A-8B

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

October 2006

Matter 8A: Sub-regional Strategy

(i) Does the strategy communicate a clear, sustainable and appropriate vision for the sub-region? If not how should the strategy be modified?

- Do the proposals for employment, housing, transport and the environment amount collectively to a coherent and appropriate vision for the sub-region?**

1. NWDC and Paycause Ltd consider that there are aspects of the strategy for the Liverpool City Region (LCR) that are contradictory in certain key regards. We refer in particular to the policy approach in respect of Chester and Warrington.
2. Chester is the key centre within West Cheshire and a Regional City with a national and international reputation. Policy LCR4 and supporting text emphasise the importance of supporting sustainable economic growth in Chester and refer to its role as a driving force in the sub-regional economy with a strong national and international role as a financial and business centre. The West Cheshire and North East Wales Sub Regional Spatial Strategy, which paragraph 13.12 of draft RSS says has informed the development of the strategy, refers to Chester's unique market role and its 'gilt-edged' profile. It is therefore of concern that Policy LCR1, the main scene setting policy that sets priorities for plans and strategies within the City Region, completely omits this key message.
3. West Cheshire (with Warrington) is categorised along with other more rural parts of the LCR as an area within which sustainable growth and development will complement programmes and development in the Liverpool City Centre, Inner Areas and the remaining northern part of the City Region. This would appear to imply that development opportunities in Chester should be somehow subordinate or subsidiary to these areas when in fact economic growth in the City is likely to have a much broader reach; its role in assisting improved competitiveness in the regional and UK markets should be encouraged for the significant advantages it can bring, in its own right, to securing the wider vision and objectives for the Region as a whole.
4. Paragraph 13.5 confuses the issue further by suggesting that, with the main focus of

development being in the northern part of the LCR, there may have to be a degree of restraint elsewhere within the City Region in order to support areas most in need. In view of the geographical definitions (in footnotes to Policy LCR1) of the areas that constitute the 'northern part' of LCR, this statement appears to imply, by process of elimination, that the focus of restraint must encompass the Chester area.

5. Furthermore, it is completely bewildering that the policy direction for West Cheshire in Policy LDF1 is couched solely within the context of its relationship with the other parts of the Liverpool City Region despite the acknowledged close functional relationship between West Cheshire and North East Wales and the long-standing recognition of the need for a sub-regional, cross boundary, spatial development framework that formed the *raison d'être* for the cross –border Sub-Regional Spatial Strategy. We say more about this in a later section.
6. The manner in which Policy LCR1 refers to Warrington, which draft RSS also locates within the Manchester City Region, is inconsistent with Policy MCR5 which recognises the very significant economic role that the town already fulfils at both sub-regional and regional level, its strategically important location and the intended focus of major regionally significant investment to the north west of the town. The implication that all development should be complementary to prioritised development elsewhere within the City Region is unacceptable; the region must be allowed to play to its strengths to achieve RSS, RES and Northern Way objectives and Warrington is an important element of the armoury needed to secure improved regional economic performance.
7. In a nutshell, the LCR strategy presents mixed messages; its intended implementation in development control terms is unclear and so too is the method by which it will be monitored.
8. It is therefore recommended that Policy LCR1 is amended:
 - A new bullet point should be added that relates specifically to the need for plans and strategies to promote the opportunities in West Cheshire for establishing more sustainable patterns of cross border development and movement with North East Wales;
 - A further new bullet point is added which promotes and supports the sustainable growth and investment opportunities that Chester provides as a driving force in the regional economy and at national/international level;

- A further new bullet point should recognise the economic status of Warrington in sub-regional and regional terms.
9. Elsewhere within the LCR, NWDC and Paycause Ltd support the acknowledgement in paragraph 13.8 that the roles of other regional towns and local centres within the northern part of the Liverpool City Region should be enhanced in terms of their regeneration needs and opportunities in terms of service provision and jobs. However, we remain concerned by the intended complementary function of development to Liverpool City Centre and the Inner Areas. We consider that the policy should also recognise that these settlements are centres of population, generating significant requirements for housing, jobs and services in their own right, for which sufficient provision should be made in sustainable locations.
10. The towns listed in Policy LCR3 are acknowledged. However, there are other centres such as Maghull /Lydiate in Sefton, which fulfils a similar role and should also be included.
11. In terms of housing, we are concerned that the emphasis given to a development focus upon Liverpool City Centre and the Housing Renewal Pathfinder areas (Policies LCR1 and LCR2 refer) may restrict the ability to respond elsewhere to the findings of sub-regional housing market assessments when these are completed. Other towns clearly do have a role to play in contributing to economic growth within the City Region and making it a more attractive place to live in and to invest. Policy LCR3 should acknowledge this by the addition of the words 'and housing' to the end of the opening sentence of the fourth bullet point.

(ii) Does LCR4 adequately reflect the policies and strategy emerging from the West Cheshire/North East Wales Sub-Regional Strategy?

12. Policy LCR4 fails to acknowledge the close functional inter- relationship between West Cheshire and North East Wales that the cross-border Sub-Regional Spatial Strategy seeks to address. The raison d'être for the preparation of the Sub-Regional Strategy stemmed from existing RSS13 that stresses the importance of close collaboration among relevant authorities and agencies on both sides of the border to assess development requirements for the sub-region as a whole. Paragraph 3.32 comments that:

'The assessment should inform the adoption of policies and actions which would establish a more stable and sustainable relationship between the component local planning authorities of the sub-region. This will need to be a significant feature of existing and future joint cross-border working on a sub-regional, cross-boundary, spatial development framework for the Chester/Wrexham/Flint sub -region.'

13. Although paragraph 13.12 of draft RSS says that the policy framework for Chester and Ellesmere Port has been informed by the strategy, Policy LCR4 refers only to transport links with North East Wales and says nothing about the socio-economic relationship that is actually much stronger than the linkage existing between West Cheshire and the rest of the Liverpool City Region. NWDC and Paycause Ltd consider that the Policy should be re-titled the West Cheshire/North East Wales Sub-Region and that the Liverpool City Region Sub-Regional Diagram should be amended to acknowledge this relationship.
14. Paragraph 13.12 states that further refinement of policy in RSS may be required when the Sub -Regional strategy is agreed but this raises procedural questions about how and when it is intended that this will take place and the level of scrutiny and consultation to which the process will be subjected. Unless LCR4 provides the appropriate policy framework and reference, it is unclear as to how the policies and principles of the 'agreed' sub-regional strategy will feed down into the LDF process in the relevant districts of West Cheshire.
15. In our earlier representations to draft RSS, we refer to our response to the Sub-Regional Strategy during consultation in February this year. We have supported the proposed reinforcement and promotion of Chester's role as a key centre in terms of financial and business services, and as a location for prestigious employment sites, including national headquarters. To enhance this role, the strategy recognises that a new premier business park is needed in the Chester area that must be of comparable quality, size and location to the existing and highly successful Chester Business Park that is almost fully developed. (Policies ECON 2 and 3). It recognises that the south west of the city offers the best prospects for meeting these credentials and that green belt options should be reviewed because choices of site are limited. It considers that:

'In limited instances there may be a case for Greenfield development where other gains outweigh the loss of greenfield land. The attraction and development of knowledge-based industry by providing nationally and internationally competitive sites is considered to be such an instance. The role of Chester is crucial to this ambition.'

16. Although supporting text to Policy RDF5 in draft RSS touches upon this, Policy LCR4 is silent on the matter. This should be rectified.
17. The Sub-Regional Strategy indicates that new employment sites should be complemented by upgrading existing ones and that in West Cheshire this could be supported further by the construction of the proposed Chester Western Relief Road to the south and west of Chester which would significantly improve access to employment sites and help to link Chester to a number of regeneration areas. The last bullet point of LCR4 alludes to this but should be clearer about how this can be achieved.
18. The Sub-Regional Strategy recognises that the linkages between housing and employment are relatively poor and that this relationship is becoming increasingly crucial. We have supported the principle that it outlines of strategic mixed- use locations, or housing close to strategic employment sites, that can help achieve more sustainable patterns of development. We believe there are opportunities in the south west of Chester to do so.
19. However, we have indicated, in representations, that the Sub-Regional Strategy gives insufficient emphasis to the crucial link between housing provision and the ability to achieve economic aspirations for the sub-region. The ability to make the most of Chester's economic strengths is unlikely to succeed without sufficient housing provision in sustainable locations. Policy LCR4 of draft RSS makes no reference to the importance of strategic mixed use locations and whilst acknowledging the need to support the role of Chester and Ellesmere Port in developing sustainable economic growth, it says nothing about the fundamental role that housing must play to secure these objectives.
20. NWDC and Paycause Ltd consider that Policy should be revised to take into account all the above points.

Matter 8B: Housing Issues

(i) Is the sub-region's housing provision and distribution appropriate and achievable? Are the PDL targets in Table 9.1 realistic, deliverable and based on robust evidence?

1. In response to Matter 4A/4B NWDC have outlined reasons why we consider that the proposed scale of provision for the region as a whole is insufficient to support forecast household growth and increased economic success. This has clear manifestations for the sub-region as well. We have also drawn attention to particular examples of anomalies in LCR, particularly in terms of Warrington, Skelmersdale and Sefton. We have stressed the importance of ensuring that sufficient housing is made available to support economic growth in Chester. We do not support the proposed housing provision for Wirral. Draft RSS proposes an annual average rate of just 250 in draft RSS contrasting with the 2003-based household projections that show an average annual growth of 1000 households per annum between 2003 and 2021. Wirral comprises major centres of population in its own right and presents major regeneration challenges and opportunities. We believe these aspirations are unachievable if growth is pegged at this level.

2. Outside Liverpool, which remains at 90%, the PDL targets for the rest of LCR impose significantly increased expectations compared with existing RSS. The proportional increase in targets is even more exacting as the proposed scale of housing provision is higher for virtually all districts. It is essential that the evidence base is constantly updated and that site suitability, availability and viability are taken into account, as draft PPS3 requires. The identification of brownfield site potential does not mean that development for housing will automatically follow or that the timing of release for development can be predicted with any certainty. There are a great variety of reasons why sites do not come forward in accordance with expectation. In consequence, Greenfield sites may need to be brought forward, in sustainable locations to ensure a sufficient land supply.