

**Statement on behalf of Prime Resorts Ltd and Persimmon Homes
Lancashire Ltd in respect of Matter 9**

By RPS Planning

Matter 9A

- (i) **Does the strategy communicate a clear sustainable and appropriate vision for the sub region? If not how should the strategy be modified? In particular:**
- **Do the proposals for employment, housing, transport and the environment amount collectively to a coherent and appropriate vision for the subregion**
 - **Are the proposals for employment land (of various kinds) appropriate and achievable**
 - **Are the transport proposals adequate and logical in relation to the strategy as a whole**
 - **Is adequate attention paid to issues of climate change and the protection of the environment**

We address the first bullet point last as it is the most comprehensive; the second and third lead into it.

In respect of employment land, the proposals for Regional Investment Sites (three, one a reserve site) are probably not enough if the CLCR is to be somehow elevated to the status of Liverpool or Manchester. Blackpool and Burnley miss out.

RSSs lack locationall specificity, but NWRSS does not go far enough in simply identifying “Central Preston” (or any similar area) as a “knowledge nuclei site” without a clear indication of the economic and other sectors involved, and the linkages between them. The work of the three authorities provides more detail (for example on the size and specialisms of the University of Central Lancashire) which should be at least summarised in the RSS to add substance to a point which currently lacks it.

Turning to transport, the schemes listed in Table 10.2 in CLCR are not numerous. All (even the very expensive Blackpool and Fleetwood Tramway Upgrade Phase 1) are of local significance and do little towards integrating the various parts of the CLCR. They are likely to assist movement within the four main subdivisions of the CLCR. This would be consistent with what we consider to be a more appropriate approach to CLCR – to treat the four principal towns and their hinterlands as separate entities. The transport proposals are in our opinion therefore neither adequate nor logical in relation to the strategy as a whole. On the other hand, they could be adequate, and certainly make more sense in principle, to a more disaggregated strategy for this part of Lancashire.

For these reasons relating to employment and transport we consider that the proposals do not amount to a coherent strategy for the region. The question covered by Matter 9A (ii) is in our view the prior question – does the putative CLCR actually constitute a region for which a coherent strategy could be devised? We think not, for reasons given below.

Climate change is not mentioned as an overriding concern. The coherence and effectiveness of the otherwise potentially useful environmental management policies may be reduced if climate change is not directly addressed.

We therefore consider that the strategy should be modified in the following ways:

- By abandoning, or reducing the significance of, the CLCR as a concept which attempts to yoke together disparate parts of large areas of Lancashire which do not possess the necessary unifying factors or the potential for such integration.
- By focusing instead on a SWOT analysis of the four major towns and their surrounding areas, in particular by developing the economic potential of the Greater Preston area as the most promising area for significant growth. Such an analysis already appears in the Central Lancashire City Sub Regional Strategy published by the three authorities.
- By ensuring that all parts have, or benefit from, a Regional Investment Site.

- By concentrating transport measures on improved sustainable movement within, rather than between, the component parts of CLCR.
- By ensuring that maximum use is made of PDL in accommodating housing requirements, and
- By including a policy specifically for climate change comparable to Policy CC2 in the South East Plan.

Matter 9A

(ii) Does the Central Lancashire City Region have any coherence in functional, social/cultural, geographic and economic terms?

Draft RSS presents little evidence to show that CLCR constitutes a coherent region. At the local level, one of the first LDF Core Strategies to be examined - Lichfield - was found to be “unsound” by an Inspector on two grounds, the second of which was “major deficiencies in the evidence base”. We believe that comparable rigour should be expected of RSS.

The evidence that we consider demonstrates a lack of coherence is summarised below. First, however, there is the question of nomenclature. We agree with Preston, South Ribble and Chorley Councils that Central Lancashire should refer to these three authorities. So much of what was traditionally Lancashire has long not formed part of the administrative County – Wigan, Bolton, Bury and Rochdale for example. So much of what remains of the County is defined by RSS as CLCR (12 districts) that there is little left – only West Lancashire and Lancaster districts. CLCR includes areas for example around Burnley which are perhaps more accurately referred to as East Lancashire.

Travel to Work Areas (TTWAs) are in our view the most useful single definition of functional (and economic) regions. The work of the three authorities also gives TTWAs due prominence (see CLC Sub Regional Strategy: Audit and Analysis Report paragraphs 2.21 to 2.29). CLCR has four main TTWAs based on each of the principal towns. Burnley TTWA is small, based on the Borough only, but Preston TTWA is much larger, taking in the City, plus the whole of South Ribble and Chorley

and parts of West Lancashire and Ribble Valley. But even this does not compare to the size of the TTWAs for Liverpool and Manchester. Population and other data are provided in Appendix 1.

The two key points from Appendix 1 are as follows.

First, the population of the putative CLCR approaches 1.2m. This is substantially less than the Manchester region, as defined by the districts which are wholly included in the Manchester TTWA (1.9m), spread over a much wider area and without the single dominant city centre and public transport infrastructure which enables Manchester to function as the centre of a city region.

Secondly, the three districts of Preston, South Ribble and Chorley have a significantly smaller total population (about 350,000). Preston however shares with Manchester the highest job density (1.2) of any of the 28 authorities for which data are presented, strengthening its claim to be a focus for development and economic activity - but this must be at an appropriate geographical scale.

The functional links which paragraph 14.8 of RSS acknowledges are between the main towns and smaller settlements, and not between the main towns themselves. The small travel to work flows between Blackpool and Preston, and Blackburn and Preston, are referred to in the Audit and Analysis report paragraph 2.22. TTWA boundaries are not impermeable, but the travel to work flows between the major towns are not so large as to bind the CLCR together in a single TTWA.

The Audit and Analysis report considers (paragraph 2.23) that evidence on migration reinforces that on travel to work.

Figure 6.3 of the report CLCR Sub Regional Strategy First Detailed Proposals shows shopping catchment areas. Preston's is even larger than the TTWA, taking in much of Wyre District in addition. This reinforces the separateness of the four component parts of the CLCR, and at the same time the three authorities claim to be regarded as a City Region in their own right.

Insofar as social and cultural issues are relevant and can easily be identified, the four main towns have separate identities and (for example) rival football teams.

In geographic terms we consider that the CLCR has little coherence as a region. There are significant differences in accessibility. Preston is the most accessible of the four principal towns, on both the M6 and WCML. It has the best access to Liverpool, Manchester and rest of the country. The other three towns (especially Burnley) are less accessible by road, despite being served either by the M65 or M58, and are significantly less accessible by rail, with few if any direct services from for example London. A change at Preston (or Manchester) is normally needed. On this basis we conclude that CLCR has little geographical unity.

The point is reinforced by the CLRC Diagram in RSS. Among others things, it shows how far apart the foci for growth are, that Elevate East Lancs covers a significant part of the Region, (the point is not so much that the names are confusing, but that separate treatment is needed) and only one Key Public Transport Interchange – at Preston.

We thus conclude that the CLCR lacks coherence in terms of any of these criteria.

Matter 9B: Housing Issues

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

We refer the Panel to our original representations, which dealt with this issue in some detail, and which need not be repeated here.

We note the substantially increased housing provision for the three districts and believe that it should be accommodated – there are no overriding planning constraints which should prevent this. The Green Belt could be rolled back if necessary. We are aware of instances in which land has been taken out of the Green Belt to accommodate development, for example on the edge of Nottingham, or where this has been recommended, for example in the Gloucester and Cheltenham Green Belt. However, any such approach in this part of Lancashire (or indeed anywhere) would have to satisfy the onerous requirements of PPG2, and could be avoided altogether if best use of PDL were made. RPS is also aware of situations in which a more sustainable approach is to allocate a greenfield site on the edge of an urban area rather than a remote previously developed site. However, we consider that this

does not apply here - the Preston/South Ribble/Chorley area is sufficiently compact for brownfield sites to always represent the better option in principle.

Achieving the overall figure for Greater Preston will probably be jeopardised if the distribution between the three districts remains as it is, with very large increases (over the previous levels of provision in the Structure Plan) for Preston and for South Ribble, and modest increase only for Chorley.

We consider that the PDL targets are not realistic; especially in relation to Preston itself. In the Lancashire SP, Preston alone among the districts required greenfield provision to meet the requirement; then standing at 4,200 dwellings; the brownfield contribution was 47%.

Now, the housing requirement has more than doubled (annual provision +81%), making it very difficult for Preston to contribute to an overall increase in the PDL target from 55% to 80%. We note that the three authorities themselves consider (in their joint submission to NWRA) that the PDL target of 80% is too high, and suggest 75% instead. As part of the Preston TTWA, Chorley has the potential to provide housing for the TTWA as a whole, and to support employment growth in the Borough itself, and incidentally to meet the target for PDL.

In the circumstances, we consider that maximum use should be made of PDL to minimise incursion into Green Belt, and also the use of any high-grade agricultural land.

We are sceptical about any approach to strategic planning which relies heavily on smaller brownfield sites, which if identified are usually too small to make a significant contribution to a successful strategy, or if unidentified, whose location cannot be anticipated at all. We consider that the NWRSS should provide firmer advice than is currently contained in Policy DP1, to encourage LPAs to identify previously developed sites on a sufficient scale to provide for a coherent settlement pattern, where positive impacts can be maximised and any adverse impacts mitigated more effectively. For example RPS is dealing elsewhere in England with a situation in which the rate of grant of small windfall permissions is undermining the LPA's objectives for the provision of affordable housing – most of the sites coming forward are below the relevant threshold. The use of larger sites also creates a situation in which it is easier for all parties to deal with appropriate contributions under other

RPS Planning

headings for which they are sought – for example open space, public transport and education.

In conclusion therefore we strongly recommend a significant redistribution in favour of Chorley, to (a) ensure that the total requirement can be achieved and (b) the target for provision on PDL, if not actually achieved, is at least approached.

Appendix 1

Data for selected local authorities

Grouped by travel to work area - whole districts

District	Population	Economically Active	NVQ4 and above	Jobs	Job Density
Liverpool	447,500	184,500	20.0%	240,000	0.8
Knowsley	149,400	64,500	14.0%	59,000	0.6
Sefton	280,900	123,100	24.9%	115,000	0.7
<i>Total</i>	<i>877,800</i>	<i>372,100</i>		<i>414,000</i>	
West Lancashire	109,500	52,700	31.7%	48,000	0.7
Manchester	441,200	165,600	26.7%	341,000	1.2
Salford	216,400	96,300	18.1%	126,000	0.9
Trafford	213,200	102,700	32.5%	145,000	1.1
Macclesfield	150,500	73,000	39.8%	90,000	1.0
Stockport	281,600	146,200	29.9%	138,000	0.8
Tameside	214,100	103,000	18.7%	85,000	0.6
Oldham	219,200	103,300	18.3%	95,000	0.7
Bury	183,500	91,900	26.8%	73,000	0.6
<i>Total</i>	<i>1,919,700</i>	<i>882,000</i>		<i>1,093,000</i>	
Bolton	265,400	122,600	19.7%	119,000	0.7
Rochdale	206,400	96,200	18.3%	86,000	0.7
Preston	131,300	59,400	23.5%	99,000	1.2
Chorley	103,700	51,400	26.4%	47,000	0.7
South Ribble	105,800	53,500	20.6%	50,000	0.8
<i>Total</i>	<i>340,800</i>	<i>164,300</i>		<i>196,000</i>	
Wigan	306,700	146,700	19.9%	117,000	0.6
St Helens	176,300	81,100	21.7%	66,000	0.6
<i>Total</i>	<i>483,000</i>	<i>227,800</i>		<i>183,000</i>	
Blackburn	140,200	60,600	20.2%	72,000	0.8
Hyndburn	81,600	35,500	21.0%	32,000	0.7
Rossendale	66,000	31,500	28.3%	26,000	0.6
Ribble Valley	56,900	26,800	34.3%	30,000	0.9
<i>Total</i>	<i>344,700</i>	<i>154,400</i>		<i>160,000</i>	
Burnley	87,700	40,100	20.4%	41,000	0.8
Pendle	89,300	40,200	22.8%	35,000	0.7
Blackpool	142,900	62,800	15.6%	68,000	0.8
Fylde	76,400	34,200	34.2%	46,000	1.0
Wyre	109,900	97,000	26.2%	41,000	0.7
<i>Total</i>	<i>329,200</i>	<i>194,000</i>		<i>155,000</i>	

Putative CLCR

District	Population	Economically Active	NVQ4 and above	Jobs	Job Density
Preston	131,300	59,400	23.5%	99,000	1.2
Chorley	103,700	51,400	26.4%	47,000	0.7
South Ribble	105,800	53,500	20.6%	50,000	0.8
Blackburn	140,200	60,600	20.2%	72,000	0.8
Hyndburn	81,600	35,500	21.0%	32,000	0.7
Rosendale	66,000	31,500	28.3%	26,000	0.6
Ribble Valley	56,900	26,800	34.3%	30,000	0.9
Burnley	87,700	40,100	20.4%	41,000	0.8
Pendle	89,300	40,200	22.8%	35,000	0.7
Blackpool	142,900	62,800	15.6%	68,000	0.8
Fylde	76,400	34,200	34.2%	46,000	1
Wyre	109,900	97,000	26.2%	41,000	0.7
<i>Total</i>	1,191,700	593,000		587,000	