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CHAPTER 1 INTRODUCTION

- 1.1 The Regional Spatial Strategy for the North West Submission Draft (January 2006) covers the period to 2021 and is intended to replace the existing Regional Spatial Strategy for the North West. Throughout this Report 'draft RSS' has been used to refer to the Submission Draft Regional Spatial Strategy for the North West (January 2006) and RSS to refer to the final Regional Spatial Strategy and its successors. The term RPG13 is used to refer to the Regional Planning Guidance for the North West to 2016, published in March 2003. This has subsequently become the approved Regional Spatial Strategy for the North West (RSS13).
- 1.2 The draft RSS was placed on deposit from 20 March to 12 June 2006. As a result, responses were received from individuals, organisations, interest groups and local authorities generating 738 separate responses and approximately 4000 representations.
- 1.3 We were appointed by the First Secretary of State to conduct an Examination in Public (EiP) of selected issues arising out of the draft RSS. Based on the objections and representations received, eleven matters for examination were selected by the Panel in consultation with the North West Regional Assembly (NWRA or the Assembly) and the Government Office for the North West (GONW). We selected the participants to be invited to appear at the EiP, also in consultation with NWRA and GONW. In total 106 individuals or organisations were initially invited, and all but a few accepted. Subsequent invitations were extended to additional participants, resulting in 131 separate organisations and individuals participating in the EiP.
- 1.4 The Timetable, Matters and Participants and the Panel Questions are reproduced as Appendix C to this Report. All participants were given the opportunity to submit statements prior to the commencement of the EiP and these were made available for public inspection before the EiP opened. Statements prepared by NWRA were likewise made available for inspection. A number of Briefing Notes were submitted by NWRA and GONW at the request of the Panel. Written statements put in by those who were invited but unable to attend, as well as those who were not invited, have also been taken into account in the preparation of this Report. A library was available both before and during the EiP where copies of core documents, submitted documents, participants' documents and other EiP documents were available for inspection. The core documents, submitted

documents and EiP documents lists are at Appendix D and we refer to some of the core documents in this Report. A list of abbreviations used in this Report is at Appendix E.

- 1.5. The independent EiP web site www.northwesteip.co.uk, was regularly updated to provide information on the progress of the EiP. This contained summaries of the representations received, and copies of the participants' written statements. The documents library contained many of the documents in electronic format for viewing over the internet.
- 1.6 A Preliminary Meeting took place at the Wigan Investment Centre on 27 July 2006. The purpose of the meeting was to explain the nature of the proceedings and to allow an opportunity for the Panel to address any questions on how the EiP would be run. The EiP was held between 31 October 2006 and 16 November 2006, 9–18 January 2007; 24-26 January 2007 and 15 February 2007.
- 1.7 We spent a number of days prior to the EiP touring the Region, including visiting locations relevant to the matters being examined.
- 1.8 A number of seminars were held to cover detailed issues relating to data and methodology, which enabled the Panel and others to understand the reasoning behind the policies. The seminars were held between 11-13 September 2006, and covered six topics;
 - 11 September - **Transport**
 - 12 September - **Employment**
 - 12 September - **Housing**
 - 13 September - **Waste**
 - 13 September - **Energy**
 - 13 September - **Sustainability Appraisal/
Strategic Environmental Assessment**
- 1.9 All of the sessions at the EiP were recorded on compact disc; copies can be made available, on request from GONW.

Structure and Content of the Report

- 1.10 The EiP discussions themselves are only part of the inputs to our conclusions and recommendations. We have also taken account of a great deal of written material, including the original responses to consultation on the draft RSS, the written submissions of participants, and many background documents submitted to the EiP. The EiP discussions and seminar sessions were held in public and are a matter of record – it is not the purpose of this Report to reproduce them in detail.
- 1.11 Our report concentrates on presenting our conclusions and recommendations for changes we consider the Secretary of State should make to the draft RSS. In doing so we have not sought to lay out the whole of the evidence and argument that led to each conclusion. To have done so would have made a report of immense length and complexity and would not in our view have aided clarity. Instead of this we have adduced only so much reasoning as is necessary to explain the basis for the view we have reached. The fact that a piece of argument or evidence is not mentioned does not mean it has been ignored. We believe those who participated in the EiP will recognise the background to the decisions we have reached.
- 1.12 Inevitably there were issues that arose at several points in the EiP, for example in both the general and the sub-regional Matters. These are reflected in this Report, although we have tried to avoid too much repetition. Where an issue is mentioned more than once we have generally included cross-references, and sought to keep the main discussion of that issue close to where any relevant Recommendations are made.
- 1.13 During the EiP and the process leading up to it, there were a number of announcements and publications which made for an ever changing strategic policy context and evidence base to the consideration of the draft RSS. Where these have occurred and have contributed to our deliberations, they are mentioned in the relevant chapter, and we do not recount them here.
- 1.14 Just as we were completing our Report, at the beginning of March, the NWRA submitted Briefing Paper 28 and EiP/NWRA/23, which deal with detailed wording errors and changes. For the most part these have been raised in earlier Briefing Papers (particularly BP20), or in evidence, or during the EiP. We therefore believe we have taken all of these points into account, but were unable, due to the lateness of their submission, to go through these documents in detail.

Panel

- 1.15 Chairman: Mr Chris Shepley CBE BA (Hons) DipTP MRTPI
Inspector: Mr Mike Hurley BA (Hons) DipTP MRTPI
Assisted by: Mr Chris White BSc (Hons) DipTP MRTPI
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Secretariat

- 1.16 Panel Secretary: Mrs Helen Wilson BA (Hons)
Panel Assistant: Ms Joanne Parr BSc (Hons)

Acknowledgements

To the participants

- 1.17 We are grateful to all those organisations and individuals who participated in the examination process, including NWRA for their help in responding to requests for information.

To the North West RSS Panel team

- 1.18 We thank those who have assisted us in the EiP process for their help and support. Helen Wilson (Panel Secretary), Joanne Parr (Panel Assistant) and Chris White and Mark Wilson (Higher Planning Officers from the Planning Inspectorate) all made an invaluable contribution to the work of the Panel in each of their roles.

Other persons and organisations

- 1.19 We thank the staff of GONW, in particular Ian Brooke and Sandra Moss, who helped to arrange and provided facilities for the Examination. We also thank the Wigan Investment Centre, where the EiP was principally held, the Lake District National Park Authority where several sessions of the EiP were held at their headquarters in Kendal, and everyone who assisted before and during the EiP.

CHAPTER 2 OVERVIEW

2.1 The purpose of this Chapter is to consider not the policies and content of the draft RSS but the general approach which was taken. Further Chapters amplify some of these points and, like the draft RSS itself, our report must be read as a whole. We consider here the overall adequacy of the draft RSS, some of the deficiencies which we perceive, the question of whether it is consistent with national and regional policies and strategies of various kinds (including cross-border issues), and the adequacy of the Sustainability Appraisal/Strategic Environmental Assessment and Appropriate Assessment. We then deal with the soundness tests set out in PPS11.

Context

2.2 We were told on numerous occasions that the draft RSS had been produced very rapidly. We were instructed that GONW had set NWRA a very tight deadline – which they had met – of eighteen months for its preparation. Several times during the EiP NWRA explained what seemed to us to be deficiencies in the Strategy by reference to this challenging timetable.

2.3 It is not for us to comment on the rights and wrongs of this process, or to assign blame, but we are clearly concerned with the outcome – which is that the Strategy is deficient in a number of respects. These include amongst other things the end date of the Strategy, the identification of Key Service Centres, failure to deal with gypsies and travellers, and gaps in respect of waste and energy.

2.4 There are a number of other weaknesses, which the Assembly could not entirely have avoided because Government guidance emerged too late to be fully incorporated in the draft RSS or the process of its preparation – notably in respect of the definition and application of Housing Market Areas, Appropriate Assessment, and the draft PPS advice on Climate Change, which was published during the EiP.

2.5 For all these reasons we advise that the draft RSS is not satisfactory as it stands, and will not be so even if it is altered according to our recommendations. We advise that it should proceed to publication (we deal with the soundness tests below), but we advise that an early and quite wide-ranging review of the Strategy is necessary. We feel bound to comment that, to the extent that these deficiencies are the result of the need to comply

with the very tight deadline set by GONW, the proverb which says "more haste, less speed" seems apposite.

RECOMMENDATION

R2.1

We recommend that a partial review of the RSS is carried out as soon as possible, with a view to publication of the revised RSS not later than 2009.

We recommend that this should cover:

- **Rolling the Strategy forward;**
- **Housing policy, including the identification of Housing Market Areas;**
- **The identification of Key Service Centres and the revision of the relevant policy;**
- **Waste Policies – especially the identification of broad areas for the location of facilities;**
- **Renewable Energy policies – again covering broad locations;**
- **Accommodation for Gypsies and Travellers.**

In each of these cases the reasoning is set out at the appropriate place in our Report.

We strongly recommend that publication of this review of the RSS is not delayed as a result of these deficiencies.

- 2.6 We appreciate that such an early review will have implications for LDDs but we believe that the review is necessary to deal with the deficiencies in the draft RSS. In the meantime local authorities should not delay work on the commencement of LDDs. It has always been the case, and always will be the case, that there will be interaction between ongoing regional and local plans. This should not be used as a reason for delay.

End Date

- 2.7 The end date of the draft RSS is 2021. PPS11 requires that RSS should look ahead 15-20 years (paragraph 1.3) – so that even if

it is published in 2007 it will fail to meet this target. LDDs produced by local authorities during the next few years will not be able to be measured, for example, against RSS housing figures which guide them for the 15 year period which PPS3 requires them to consider (we suggest a way of dealing with this later). The Assembly referred in justification to a lack of data and to the time constraints which had been set for them; they also indicated that this had been the end date set in the project plan which they had agreed with GONW. But whatever may have been discussed at that time the fact is that, as we write this Report, the Strategy fails to see far enough ahead; this needs to be rectified. We were invited by GONW to rectify it ourselves but we clearly do not have the information to do so.

- 2.8 If the roll forward which we have recommended were to 2026, and even if it were accomplished by 2009, it would still only look ahead for 17 years – within the target but still not at the upper end of the range. A longer period might be appropriate, aiming to look forward for 20 years.
- 2.9 The Assembly indicated that they had done some “visioning” work, looking beyond 2021, but there were few clues in the documentation as to the future of the region in the longer term. The Panel hope that ongoing work will provide a sound basis for rolling the RSS forward.

Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), and Appropriate Assessment (AA)

- 2.10 During the EiP we discussed the adequacy of the SA/SEA. In the evidence and statements which had been submitted to us there was very little comment on the adequacy of the process or the documentation. The work had been carried out (and would continue to be carried out through the next stages) by a respected and reputable firm of consultants, properly appointed and briefed.
- 2.11 There were some comments concerning the fact that only two alternatives had been considered. A wide range of options had been examined when RPG13 (now RSS13) was produced and the Assembly did not see value in repeating this process. The two options which were now examined were the “do-nothing” option, based on the existing (RPG13) strategy for development (essentially based on development in the Mersey Belt); and the “do-something” option based on three City Regions (Manchester, Liverpool and Central Lancashire).

- 2.12 We deal later with the implications of the choice which was made – the latter option – but in respect of the SA/SEA we do not believe this approach was unreasonable. We saw no evidence to suggest that there were other realistic options which should have been re-examined. We conclude that the SA/SEA was sound.
- 2.13 We note however that some of the parties suggested that some of the recommendations in the SA/SEA could be more effectively carried through into policy and this informs our consideration of the issues which follow throughout this report. We do not accept the Friends of the Earth’s argument that the proposed policy for airports fails to take sufficient account of the SA/SEA, and may be in breach of Article 8 of the EU Strategic Environmental Assessment Directive.
- 2.14 Appropriate Assessment is a different matter. It has not been completed. At the time of the EiP hearing on this matter stages 1a and 1b (screening and avoidance measures) had very recently been completed. This had shown that an AA was required of a significant number of policies in the draft RSS in relation to water resources and water quality issues (see letter from English Nature to NWRA of 28th September 2006 (Ref EIP/NE/2)). The assessment should address three European sites – River Derwent and Bassenthwaite Lake SAC, River Eden SAC, and Mersey Estuary SPA Ramsar - and possibly several further sites. We were told (in NWRA Briefing Paper 21a) that this work could not be completed by the time we submitted our report.
- 2.15 It was agreed by all parties at the EiP that the Panel had no option but to leave AA to be dealt with, alongside our report, by GONW, and this was acknowledged in a letter from GONW to NWRA dated 27 October 2006 (Ref EIP/GONW/4). Clearly this is not desirable, and we would have preferred to deal with it ourselves – but the evidence base was simply not available and not likely to become available.

RECOMMENDATION

R2.2

We recommend that Appropriate Assessment is considered by GONW, alongside their consideration of our report, and note that it will not be possible for the RSS to be published until this has been done.

Compliance with National Policy

- 2.16 We asked participants whether they believed that there were conflicts between the draft RSS and other policies at a national level.
- 2.17 There were of course disagreements as to the extent to which the draft RSS complied with such policies – for example on housing need or climate change – and we deal with these in the relevant sections of the report. They are matters of degree, and we have already referred to some deficiencies in the Strategy in respect of particular issues. Subject to these points there was no evidence to suggest that the draft RSS had failed substantively to comply with the requirements of PPS11 or with other national policies.
- 2.18 A number of parties raised the need for a National Spatial Planning Framework and this issue arose at various points during the EiP. It is not within the remit of the Panel to advocate such a strategy. We are aware that the Secretary of State has not accepted the comments of the Panel, which considered the East of England RSS (paragraphs 3.22-23 and recommendation 3.3), proposing consideration of some form of inter-regional review. In the North this is to some extent provided by the Northern Way, but we have little doubt that the issue raised by that Panel will re-emerge at a national level as this round of RSS reviews continues.

The Northern Way

- 2.19 There was considerable debate about the Northern Way Growth Strategy (NWGS) in evidence and at the EiP. A number of parties questioned the status of the NWGS and argued that the Panel should be considering not whether the draft RSS complied with it but whether the policies in the NWGS were the correct ones. It was not a statutory document and had not been the subject of adequate public debate or examination. It was an important contextual document but it was only one strategy amongst others. It largely ignored the needs of some parts of the Region.
- 2.20 Others, however, strongly supported the NWGS – not just the Northern Way themselves but for example Association of Greater Manchester Authorities (AGMA), Merseyside Policy Unit (MPU), North West Regional Development Agency (NWDA) and NWRA. They felt that it had helped them to look beyond boundaries, at the context within which the North West sits, and it had helped to promote schemes (the Port of Liverpool was given as an example) which fitted the Growth Strategy well.

- 2.21 There was some debate as to the difference the NWGS had actually made to the draft RSS. The Assembly argued that the central theme – the City Region idea - would almost certainly have formed the basis of the RSS even if the NWGS had not existed. It had not been selected in order slavishly to follow the NWGS, but because it was believed to be the right strategy anyway.
- 2.22 Assuming this is the case, we did not detect many other changes which had been made to the Strategy as a result of the NWGS – for example cross-Pennine links did not seem to have risen up the transport priority list. The question of links with Yorkshire, and particularly with Leeds (a theme of the NWGS) was raised on a number of occasions. Some thought they should be more strongly fostered but others thought that encouraging movement between the Cities was inconsistent with the intention to reduce the need to travel. The Panel were a little surprised that more was not made of this in the draft RSS, but we have no doubt that it is an issue which will assume greater importance in future reviews.
- 2.23 On the status of the NWGS, we are aware of the answer given by Lord Rooker in the House of Lords on 3 February 2005 (columns WA 61-62). “The RSS will be a primary delivery vehicle for the NWGS and it is important that the three Regional Assemblies take it into account. The Government expects the spatial implications of the Northern Way to be further developed, tested, and delivered through the statutory RSS process”.
- 2.24 We conclude that the draft RSS has taken full account of the NWGS, and indeed it is clear that the central theme of the draft RSS is identical to the basic concept of City Regions, which lies behind the NWGS. However, given that it is during the course of this EiP that the merits of the NWGS, as it affects the North West, fall to be publicly debated and examined, we discuss later the arguments surrounding this strategy.

Inter-regional issues

- 2.25 There were several other discussions during the EiP of issues crossing the boundary of the North West into other Regions. The most significant of these was in relation to the West Cheshire/North East Wales Sub-Regional Strategy. We deal with this later – but the production of this document, which had been called for in RPG13, is a significant step forward. There are very close functional links between the Chester area and parts of North Wales, which the Strategy deals with.

2.26 We were less clear about the other issues which were raised – notably those between South Cheshire and North Staffordshire and, to a lesser extent, links across the border into Scotland. We of course acknowledge that these links exist. But we asked at the EiP for advice as to whether the draft RSS might need to be amended to reflect them, and received no answer. It seems to us that discussions need to take place across the Cheshire/Staffordshire border – indeed this is proposed in Part 5 of the draft RSS (paragraph 17.16) – but we saw no reason to suggest any changes to the draft RSS. (Paragraph 17.16 also proposes a study – which we welcome – of another cross border issue which was briefly discussed during the EiP and which we mention later; this would cover the relationship between the Manchester City Region and High Peak).

Compliance with other North West Regional Strategies

2.27 There are many strategies which cover the North West Region. The most important – the ones which were substantially discussed at the EiP – are Action for Sustainability (AfS – the regional sustainability strategy), the Regional Economic Strategy (RES), the Regional Housing Strategy (RHS) and the Regional Funding Allocation (RFA). This is not to diminish the importance of other documents such as the Regional Freight Strategy, Regional Waste Strategy, Cultural Strategy or the Tourism Strategy.

2.28 The only one of these to raise any significant comment in relation to compliance was AfS. It was put to us that the draft RSS was not sufficiently rooted in sustainability and that paragraph 2.10 of PPS11 had not been complied with in this respect. The NWRA argued that, though it may not be explicit, AfS had been fully integrated into the Strategy. It is mentioned in paragraph 3.1. The Panel however believe that there is some force in this criticism. In the recommendations we make later, especially regarding the revision of Policy DP1, we take it into account.

2.29 There was general agreement that draft RSS accurately reflected the RES – indeed it was suggested that it might be too closely modelled upon it. There was a common evidence base. There had been much discussion and co-ordination during the preparation of the RSS and RES and indeed the RHS and RFA.

2.30 The Regional Transport Strategy is, of course, now included within the draft RSS itself and we deal with it later in this report.

Soundness tests

2.31 Some of the matters we have discussed above are included within the tests of soundness set out in paragraph 2.49 of PPS11. As previous Panels have pointed out, these tests go only part way to measuring the quality of the Strategy and our comments should again be seen in the context of what follows in the rest of this Report. Nonetheless it is incumbent upon the Panel to consider whether the draft RSS passes these tests.

- (i) *Whether it is a spatial plan, including in particular, does it properly take into account related policy initiatives and programmes relevant to meeting regional economic, environmental and social needs, where these directly impact on the development and use of land, and does it contain policies which sufficiently link with those related policy initiatives and programmes to deliver the desired spatial change.*

We believe that in general terms this test is met. While we think that there is room for improvement in the way the RSS relates to, and influences, the policies of other bodies such as those for health, education, the police and so on, we recognise that “spatial planning” is a relatively new art form. Much progress has been made, discussions are taking place, and we are encouraged to believe that this will continue. We particularly welcomed the contribution to the EiP from the health sector and the Police.

- (ii) *Whether it meets the objectives for an RSS as set out in paragraph 1.7 of PPS11.*

We believe that this test will be met if our recommendations are accepted. The RSS will set out a spatial vision for the end of the Plan period, and it will show how this will contribute to sustainable development objectives. It is reasonably concise. It will contain aims and objectives and a key diagram, and the policies are clearly set out. It will address cross boundary issues but avoid local issues, and as we have described it will generally conform with other regional frameworks and strategies. It will generally be region-specific though there are a few cases where we agree it is of value to re-state and reinforce national policy. It will not be site specific or go into unnecessary detail. It will deal reasonably with delivery mechanisms, will generally be capable of annual monitoring, and certainly adds value to the planning process. It will, with the changes we recommend, contribute towards achieving sustainable development.

(iii) Whether it is consistent with national planning policy and if not whether the case has been adequately made for departing from national policy.

As we have already indicated, we believe the Strategy is deficient in a number of respects and it is doubtful whether it meets this test in the following respects:

- The end date of 2021;
- The lack of broad locations in respect of waste treatment and renewable energy;
- Policy for Gypsy and Traveller sites;
- Definition of Housing Market areas.

The Strategy also needs to be reviewed to take further account of recent developments such as the draft PPS on Climate Change, and certain policies such as that on Key Service Centres are not yet in a satisfactory state.

Otherwise we find that the Strategy will be consistent with national policies if changed in accordance with our recommendations.

We strongly recommend that the publication of the RSS is not delayed because of these issues, significant though they are, because the Strategy contains much that is of value which will be important to local authorities preparing LDDs. But we do recommend an early review. (see recommendation 2.1)

(iv) Whether it is consistent with other relevant regional strategies for the region including the regional housing, economic and cultural strategies and with the RSSs for neighbouring regions where cross-boundary issues are relevant. Any major inconsistencies will need to be justified.

There are a number of spatial aspects to the Regional Economic Strategy. These include the identification of Chester as a location with significant economic potential that should be exploited. The draft RSS identifies Chester as a broad location for regionally significant economic development, proposing that it should continue to attract high value knowledge based industries. However we recommend against this, for reasons set out in Chapter 5 below. If this recommendation is accepted, there will be a difference of degree between the RSS and RES, rather than a major inconsistency. While there will be scope for limited

economic development at Chester, we do not consider that this should be on a regionally significant scale.

Otherwise, if our recommendations are accepted, the RSS will be consistent with other regional strategies, and deal adequately with cross-boundary issues.

(v) Whether the policies in it are consistent with one another.

The RSS will meet this test if the Strategy is changed in accordance with our recommendations, especially those in relation to the assumptions underlying the employment and housing policies.

(vi) Whether it is founded on a robust and credible evidence base.

In general we believe that the evidence base is robust. There is of course room for change and development, and further research is in progress or proposed on a number of issues (including some of those we mention in (iii) above) which will inform future reviews. It will be very helpful to bring consistency to the geographic units on the basis of which evidence is presented, but we accept that the limitations of the data are such that this has not been possible to date.

(vii) Whether community involvement and partnership working have been satisfactory, including whether the RPB has taken proper account of the views raised.

While there was some concern expressed at the EiP on this point – especially in relation to the very rapid timetable which had been set for the preparation of the draft RSS (which had led some groups to feel excluded at certain stages) - we consider that this test has been generally met.

(viii) Whether it is realistic, including about the availability of resources, and is able to be implemented without compromising its objectives.

In general we consider that this test is met. Though it is only in the area of transport that the draft RSS is explicit, we were satisfied that in respect of other key resource issues –housing, employment, water, sewerage, etc- the Strategy is realistic.

(ix) Whether it is robust and able to deal with changing circumstances.

We consider that this test is generally met.

(x) Whether it has been subject to a satisfactory SA and whether alternative options were correctly ruled out taking account of the SA findings.

As indicated earlier we find that the SA itself was satisfactorily completed and we are content with the work which was carried out on options.

(xi) Whether in all other respects it has been prepared following the proper procedures, as set out in the Act, Regulations, this PPS and related guidance.

This test will not be met until the work on Appropriate Assessment has been completed. Appropriate Assessment of the implications of the RSS for a number of European Sites is required, as described earlier, and must be carried out before publication.

Otherwise, so far as we are able to judge the requirements of the Act and Regulations have been met. As we have indicated the timescale of the Strategy does not comply with the requirement of PPS11 and we recommend that an urgent review is carried out, inter alia, to roll the Strategy forward.

(xii) Whether it has clear mechanisms for monitoring and implementation.

We consider that this test is generally met.

CHAPTER 3 STRUCTURE OF RSS, VISION, OBJECTIVES AND SPATIAL PRINCIPLES

3.1 In this Chapter we deal with comments which were made about the structure of the draft RSS. This leads us on to discuss the way in which the draft sets out its “vision”, objectives and development principles, to describe alternatives which were suggested, and to make recommendations. We deal in particular with the issue of climate change, which was the subject of much discussion at the EiP.

Structure of the Draft RSS

3.2 The draft RSS opens with an introduction (entitled “Our Vision for the North West by 2021...”) which includes some contextual material and a brief “vision”. Part 1 then contains some further and more complex contextual material, Part 2 the Regional Development Framework, Part 3 the Regional Policy Framework in a series of thematic chapters, and Part 4 the Sub-Regional Policy Frameworks, covering the five sub-regions. Part 5 deals briefly with implementation, monitoring and review.

3.3 There was criticism of this structure, most substantively from GONW in their Briefing Paper 2. This set out an alternative vision, objectives, a set of spatial principles, and a spatial framework and we deal with these below. It also proposed a restructuring of the draft RSS, in particular to re-assess the role of Part 4 (the sub-regions) and to decide whether to incorporate this material within the thematic chapters.

3.4 There was considerable discussion at the EiP of this proposition. There were some who supported it, but the majority were opposed, particularly to the omission of Part 4. Certainly when we looked at the statements and evidence which had been submitted regarding the issues in Part 4 it seemed that most parties wished to see more, rather than less, material there.

3.5 The EiP moved on to discuss where, if the sub-regional sections were to be retained, they should be placed within the report. There was a body of opinion in favour of placing them before the thematic chapters. We were advised that this is where they had been placed in an earlier draft, but they had subsequently been placed towards the end of the document in response to comments received. The NWRA alleged that parties who had previously argued for the present structure were now arguing for a reversion to the original.

- 3.6 Be that as it may, the Panel have considered this carefully. The issue seems to be finely balanced – as the above assessment implies. We conclude firstly that Part 4 does add value; it provides the kind of context for Local Development Frameworks which Structure Plans used to provide, though of course it is, and should be, much less detailed than Structure Plans. We do not think it would be easy to incorporate this into the thematic policies, it was generally popular, and we think it should remain.
- 3.7 We do however take the point made by GONW that there is a danger of introducing inconsistencies into the Strategy as a result of this separate section being included. We asked GONW to produce a note setting out what they considered to be inconsistencies within the draft RSS. This became GONW Briefing Paper 9. We asked the Assembly for their response to this paper, and in Appendix B we have set out our comments and recommendations on these points. Some of them are dealt with through other recommendations in our Report, and some are matters of very fine detail, but we hope our comments will be helpful.
- 3.8 Secondly, on the placing of Part 4, we conclude that there is no great benefit to be obtained from moving this section from its present place in the draft RSS. There are arguments for and against but we do not think that any benefits would outweigh the cost in terms of the effort required to re-structure the document and think it best to leave well alone.
- 3.9 It was also suggested during the EiP that the chapter on Transport should be moved to a position earlier in the document. This found only limited support and we reach the same view as we do on Part 4; the arguments are finely balanced and any benefits of moving the chapter do not seem to us to justify the effort and time involved.
- 3.10 There was little comment upon, or enthusiasm for, Part 1 of the draft RSS. There was, however, a quite widespread regret that there were not more maps and diagrams which could both explain the background to policy and also bring a bit of life to the document. The Yorkshire and Humber Strategy was mentioned as a model.
- 3.11 We think that the information in Part 1 is useful, though alongside their consideration of our substantive recommendations we think GONW might usefully shorten it, and combine it with the contextual material which found its way into the introduction. We agree that maps and diagrams would be helpful, throughout the

document. The document is not an attractive one; there is often little relief from dense areas of text. Illustrations would assist in this respect too. Among the topics which we think might be covered by this – as examples only – are constraints such as environment designations (such as National Parks, AONBs, European sites, etc), flood risk areas, better maps showing transport linkages and congestion, areas of deprivation/regeneration priority areas and agricultural land quality. Some of these might find a place in revised sub-regional diagrams and we discuss these later. We also deal with the Key Diagram later.

RECOMMENDATION

R3.1

We recommend that the structure of the RSS, as set out in five parts described above, should remain unchanged.

We recommend that the contextual material set out in the first part of the introduction (“Our Vision”) and in Part 1 should be combined and reduced.

We recommend that further maps and diagrams should be included at appropriate points in the report to aid understanding.

Vision, Objectives and Spatial Principles

- 3.12 Draft RSS, in the final two paragraphs of the introduction on page 2 contains a “vision” for the North West in 2021. In paragraph 4.2 it contains a set of objectives for the draft RSS as a whole, and a separate set for the RTS. In Policy DP1 it contains a set of “Regional Development Principles”.
- 3.13 The Government Office, in Briefing Paper 2, put forward an alternative vision, and a set of “spatial principles”. They proposed that objectives should appear at the start of each thematic chapter and not at the front of the Plan.
- 3.14 A number of other parties also put forward, sometimes in considerable detail, proposals which they variously described as “visions” or “objectives” – notably CPRE, AGMA and the Environment Agency (there were others too).

- 3.15 The Panel found this collection of proposals, and the debate which took place around this at the EiP, difficult. As one person commented, the aims, visions, objectives and principles seemed inter-changeable. Some of the visions looked much more like objectives, or even spatial principles, and there was little accord as to the best way forward – though there was a general feeling that the draft RSS as it stood was not clear. We share the view that the train of thought in the draft which leads from the vision, through the objectives to the development principles and beyond that to the Regional Development Framework, is not as clear as it might be. But the many and various alternatives seemed to confuse rather than clarify the situation.
- 3.16 We conclude that, in this situation, simplicity is the keynote. We were concerned that some of the suggestions were not North West specific – they could have been applied to any region. Others were “motherhood and apple pie” statements, often with a choice of cream or ice-cream. Others, such as that from CPRE, offered much of value – and received some support – but are probably best located elsewhere.
- 3.17 There was however, during the debate, some quite widespread support for a brief “North West in 2021” vision, along the lines of that included in the draft RSS, and we accept this view. It was generally felt that this should be separated out from the rather mundane description of the region, within which it was embedded.
- 3.18 The Panel felt that the GONW “Vision”, and some others, were not in this category; and should be placed elsewhere. We support the recommendation of GONW however, that there need not be a set of over-arching objectives at the start of the Strategy. This would simplify the opening parts of the Plan and enable a reasonably seamless transfer through the Vision to the Spatial Principles and on to the Regional Development Framework itself and the policies. We agree that specific objectives could instead be placed at the beginning of each thematic chapter. The Strategy would therefore move almost directly from the Vision to the Spatial Principles, and as suggested above there may well be scope for editing some of the background material which presently divides the two.
- 3.19 We believe that the key intentions of the RTS should be embraced within the overall spatial principles, with – as indicated above – a set of objectives at the start of the relevant thematic chapter.

- 3.20 As to the Vision itself, various comments were made. It was argued that it says insufficient about climate change and sustainability, and the Panel agree with this view. It was said that it is not measurable and monitorable; we agree with this too, but believe that this is not a necessity so long as the key policies which are designed to achieve it can be monitored.
- 3.21 The Panel conclude that the Vision as it is set out in the penultimate paragraph of page 2 of the draft RSS should be retained, but with an addition to reflect the importance of climate change and sustainability. This should come at the start of the Vision to reflect the requirements in PPS11 (paragraph 1.7) and of Section 39 of the Planning and Compulsory Purchase Act. We also agree with a suggestion from NWRA (in their statement on this matter) that an addition should be made to reflect the importance of improving Cumbria’s economic performance and the transformation of the local economy.
- 3.22 The Vision should be pulled out from the regional context material and given greater prominence.
- 3.23 We do not believe that there is much to be gained by further debate. Each participant at the EiP would be likely to produce a different version, and we could produce another which (whatever it said) might appeal to some people, but not to others. There are more important matters to follow.

RECOMMENDATION

R3.2

The Vision

We recommend, in respect of the two-paragraph Vision set out at the end of page 2 of the draft RSS, that the first paragraph should be retained with one addition – a reference to improving the economy of Cumbria.

The second paragraph should be deleted. A new paragraph should be inserted, before the retained paragraph.

The following suggested wording is based on part of CPRE’s proposal.

“By 2021 we will see a region that has built a coherent set of actions for delivery of sustainable development, leading

to a higher quality of life for all, and reduced social, economic and environmental disparities within the North West.

Development will be seen in a global context, and the region will attempt to 'live within its means' and contribute to the reduction of CO₂ and greenhouse gas emissions. "

We recommend that the Vision is given greater prominence.

We recommend the deletion of the set of over-arching objectives at the start of the draft RSS and their replacement by objectives at the start of each thematic chapter.

- 3.24 As we have said, we believe this should lead directly to a set of Spatial Principles. We are impressed by the GONW proposition, and it found considerable favour at the EiP. Our recommendation is therefore based on that list – supplemented by other suggestions which came forward in evidence or at the EiP.
- 3.25 There is an issue as to how climate change should be dealt with. As we have already suggested we support the view - widely held at the EiP and, in fact, little challenged – that the treatment of the subject is inadequate in the draft RSS. We do not accept the view which some supported that it should be the subject of a separate chapter; we think it should, to use a new-century jargon term, be "mainstreamed" through the draft RSS and we think a separate chapter would be likely to introduce duplication without adding value. We do not think it is necessary in order to add weight to these issues – it is the way in which they are incorporated (or not) into the Strategy and its policies which matters.
- 3.26 Policy DP1 of draft RSS ("Regional Development Principles"), which sought to bring together Policies DP1-4 of RPG13, was criticised on a number of grounds. It was felt that it tried to cover too much. It failed to distinguish accurately between those policies to be implemented through "plans and strategies" and those through "proposals and schemes." We are not convinced that the distinction is necessary. It was also argued that the first part of DP1 was hard to understand, and partly procedural.

There was debate about the sequential test, included in the policy, which we consider below.

- 3.27 The GONW alternative was widely supported, though there was criticism of it – notably that it was too long and detailed, and that it was not North West specific. It did not include an economic imperative – which GONW had included in their “Vision”, and was inadequate on climate change.
- 3.28 Nevertheless it seems to the Panel to offer the best way forward. In considering it however, a number of other issues which we discussed at the EiP are raised.

Sequential Test

- 3.29 Both DP1 in the draft RSS and the GONW alternative raise the question of the “sequential test.” There were two main concerns in relation to this.
- 3.30 Firstly, both alternatives separated buildings and land; the first test involves the use of existing buildings, the second the use of previously developed land (PDL). This, it was argued, was an unnecessary distinction, contrary to Government advice, and potentially acting as a constraint on the use of PDL. The Panel agree with this view. We do not think it likely or desirable that the release of PDL might be frustrated by the existence of an unused building elsewhere. (Though we do accept the point which was made by Friends of the Earth that there are significant energy efficiencies in re-using buildings, rather than demolishing and rebuilding).
- 3.31 The second concern was the rather familiar point that there may sometimes be greenfield sites which are more sustainably located (close to public transport for example) than PDL, which can be inaccessible or otherwise inappropriate for development. This is obviously so. But we do not accept the view that the sequential test should be either abandoned or altered to take account of it. This would weaken the RSS significantly. The point is already mentioned in paragraph 6.4 of draft RSS; this should be retained, and with it the opportunity to use undeveloped land ahead of PDL when it is demonstrably a more sustainable option.
- 3.32 We also consider that it would be valuable to include a further point, which is derived from the Yorkshire and Humber RSS (to which our attention was drawn). This places the use of infill sites ahead of the use of other land.

The Spatial Principles

- 3.33 The GONW alternative, which was largely created by importing sections from DP1 and from various other parts of the draft RSS, was acknowledged to be imperfect. The Panel have revised it in the light of the evidence and the debate, and we have also had regard to the recommendations of the Sustainability Appraisal. However we anticipate that, with the resources at our disposal, it has yet reached a state of perfection. The Panel have tried to produce a list which is comprehensive – covering all the main cross-cutting themes of the Strategy. It needs to provide a context for the thematic chapters and sub-regional chapters which follow – bearing in mind the often-forgotten point that the RSS must be read as a whole. And it needs to provide a useful and understandable context for plans, strategies, proposals and schemes. The Panel do not see value in separating out which principles apply to plans and which to proposals; they should be taken as a whole, and applied as appropriate to all planning activity at regional, sub-regional and local level.
- 3.34 We were concerned about the extent to which the proposed GONW policy was North West specific. GONW accepted at the EiP that this was an issue, but they argued that it was necessary to set out the important “cross-cutting” issues which needed to be taken into account in drawing up the very specific policies in ensuing chapters; the Panel accept this argument.
- 3.35 The length and complexity of the policy is also a concern and we have tried – as suggested at the EiP - to break it into a series of separate and reasonably consistent pieces. Over-arching Policy DP1 is followed by a set of seven policies which together comprise the Spatial Principles. There is a further policy dealing with aspects of implementation.

RECOMMENDATION

R3.3

Spatial Principles

Policy DP1 should be replaced by the following:

“DP1: The following principles underpin RSS and RTS.

Other regional, sub-regional and local plans and strategies (including documents such as the RES, RHS and RFA, non land-use strategies such as health and education, sub-regional plans such as the City Region Development Plans or the West Cheshire/North East Wales Strategy, LDDs, SPDs, and Local Transport Plans) and all individual proposals, schemes and investment decisions should adhere to these principles. All may be applicable to development control in particular circumstances:

- **Promote sustainable communities;**
- **Promote sustainable economic development;**
- **Make the best use of existing resources and infrastructure;**
- **Manage travel demand and reduce the need to travel, increase accessibility and seek to marry opportunity and need;**
- **Promote environmental quality;**
- **Safeguard rural areas;**
- **Reduce emissions and adapt to climate change.**

The seven Policies DP2-8 amplify these principles and should be taken together as the spatial principles underlying the Strategy.

They are not in order of priority.

The whole of the RSS should be read together and these principles should be applied alongside the other policies which follow.”

- 3.36 We deal first with sustainable communities, reflecting Action for Sustainability and the PPS11 requirement to root the RSS in the Regional Sustainability Strategy. It is based primarily on paragraph 9.1 of the draft RSS and on the GONW amendment to it (page 11 of Briefing Paper 2), with our own additions. We particularly stress the need for health and education facilities to be close to the people they serve – a point made by a number of parties in evidence.

RECOMMENDATION

R3.4

DP2: Promote Sustainable Communities;

“Building sustainable communities – places where people want to live and work - is a regional priority. It should be promoted by all service providers. Sustainable Communities should meet the diverse needs of existing and future residents, promote community cohesion and equality and diversity, be sensitive to the environment, and contribute to a high quality of life, particularly by:

- **Fostering sustainable relationships between homes, workplaces and other concentrations of regularly used services and facilities and the means of travel between them;**
- **Taking into account the economic, environmental, social and cultural implications of development and spatial investment decisions on communities;**
- **Improving the built and natural environment, and conserving the region’s heritage;**
- **Improving the health and educational attainment of the region’s population, reducing present inequalities;**
- **Promoting community safety and security;**
- **Encouraging leadership, joint working practices, community consultation and engagement;**
- **Reviving local economies, especially in the Housing Market Renewal Areas and other areas in need of regeneration such as West Cumbria;**
- **Integrating and phasing the provision of health and education services (including lifelong learning) and facilities to meet the current and future needs of the whole community, ensuring that those services are**

**conveniently located, close to the people they serve,
and genuinely accessible by public transport.**

The guiding principles of the UK Sustainable Development Strategy 2005 or its successors and the basic elements of sustainable communities as set out in 'Sustainable Communities: Homes for All' should be followed."

- 3.37 We next propose an explicit statement regarding economic growth – a keystone of the Strategy but essentially part of the sustainability agenda – which has been taken from the GONW "Vision" in Briefing Paper 2.

RECOMMENDATION

R3.5

DP3: Promote Sustainable Economic Development;

"It is a fundamental principle of the Strategy to seek to improve productivity, and to close the gap in economic performance between the North West and other parts of the UK. Sustainable economic growth should be supported and promoted. At the same time the reduction of economic, environmental, education, health and other social inequalities between different parts of the North West, within the sub-regions, and at local level should be a guiding principle."

- 3.38 We deal next with the best use of resources (including the sequential test), based on an amendment to the second part of Policy DP1.

RECOMMENDATION

R3.6

DP4: Make the Best Use of Existing Resources and Infrastructure;

“Priority should be given to developments in locations consistent with the Spatial Framework which:

- **Build upon existing concentrations of activities and existing infrastructure;**
- **Do not require major investment in new infrastructure, including transport, water supply and sewerage. Where this is unavoidable development should be appropriately phased to coincide with new infrastructure provision.**

Development should accord with the following sequential approach:

- **first, using existing buildings (including conversion) within settlements, and previously developed land within settlements;**
- **second, using other suitable infill opportunities within settlements, where compatible with other RSS policies;**
- **third, the development of other land where this is well-located in relation to housing, jobs, other services and infrastructure in settlements and complies with the other principles in Policy DP1.”**

- 3.39 We bring together next some principles regarding transport and accessibility taken from GONW Briefing Paper 2 and other contributions made during the EiP.

RECOMMENDATION

R3.7

DP5: Reduce the Need to Travel and Manage Travel Demand, Encourage Accessibility, and Seek to Marry Opportunity and Need;

“Development should be located so as to reduce the need to travel, especially by car, and to enable people as far as possible to meet their needs locally. A shift to more sustainable modes of transport for both people and freight should be secured, and an integrated approach to managing travel demand should be encouraged.

Safe and sustainable access for all, particularly by public transport, between homes and employment and a range of services and facilities (such as retail, health, education, and leisure) should be promoted, and should influence locational choices and investment decisions.

Major growth should, as far as possible, be located in urban areas where strategic networks connect and public transport is well provided.

All new development should be genuinely accessible by public transport, walking and cycling, and priority will be given to locations where such access is already available. In rural areas accessibility by public transport should also be a key consideration in providing services and locating new development, emphasising the role of centres identified in Policy RDF2.

Priority should be given, in locational choices and investment decisions, to linking areas of economic opportunity with areas in greatest need of economic, social and physical restructuring and regeneration. Proximity to, and access via public transport from, such areas will be important considerations in the choice of employment locations and sites.”

- 3.40 In the next two proposals we deal with environmental issues and rural areas, based on the GONW proposal together with some items from the CPRE suggestions. It also picks up the third part of Policy DP1 in the draft RSS.

RECOMMENDATION

R3.8

DP6: Promote Environmental Quality;

“The protection of environmental quality (including air and water), should be promoted, especially by:

- Understanding and respecting the character of areas and their distinctiveness;**
- Promoting good quality design in new development and ensuring that development respects its setting taking into account relevant design requirements, the NW Design Guide and other best practice;**
- Promoting sustainable construction and efficiency in resource use (including reuse and recycling of materials);**
- Reclaiming derelict land and remediating contaminated land for hard and soft end-uses to improve the image of the region and use land resources efficiently;**
- Maximising opportunities for the regeneration of derelict or dilapidated areas;**
- Promoting policies relating to green infrastructure;**
- Promoting physical exercise through opportunities for sport and formal/informal recreation, walking and cycling;**
- Improving road safety, managing traffic growth and mitigating the impacts of road traffic on air quality, noise and health.”**

RECOMMENDATION

R3.9

DP7: Safeguard Rural Areas;

“The rural areas of the North West, including those closely related with urban areas, should be considered in a way which is integrated with other decision making, and not seen as a separate topic.

The problems of rural communities (such as housing affordability, economic diversification, and access to jobs and services), especially in Cumbria, have particular causes and require particular solutions – different in sparsely populated areas from those closer to large settlements. The positive interaction between rural and urban areas should be promoted when appropriate.

The natural and built environment of rural areas should be promoted by;

- Maintaining and enhancing the character of landscapes and settlements;**
- Maintaining and enhancing the quantity and quality of biodiversity and habitat;**
- Maintaining and enhancing the tranquillity of open countryside and rural areas;**
- The efficient and prudent management of natural and man-made resources.”**

3.41 The Panel make the following points of detail. We have not set out, as GONW did, all of the basic elements of Sustainable Communities in “Sustainable Communities: Homes for All”, nor – as several parties suggested we should – have we reproduced the key guiding principles of the UK Sustainable Development Strategy (these are already mentioned in paragraph 3.1 of the supporting text). These are critically important documents, but they are widely available and we think that a reference to them rather than a repetition of them will suffice.

3.42 The first part of the original Policy DP1 has disappeared from this policy. The Panel feel that the first and second bullets in that policy are generally covered in what we have now proposed; that

the third is not necessary, being a statement of normal planning practice, and the fourth should be covered elsewhere (under implementation). GONW item (f), “recognise the role of markets” has been omitted; it seems to the Panel more appropriate as supporting text.

Climate Change

- 3.43 We begin by repeating that we agree with the criticism expressed by a number of parties, that the Strategy does not give sufficient emphasis to climate change. The Panel regard this as a serious flaw in the draft RSS under consideration. It is important to ensure that the whole of the Plan is suffused with the climate change imperative, but as indicated earlier, the Panel also believe that a specific policy statement would give prominence to the issue.
- 3.44 This was generally accepted at the EiP, and there was little, if any, dissent from the idea that this aspect of the Strategy should be strengthened. The Stern report had been published on the day before the EiP opened, and this may have underpinned these opinions. For most parties, this did not involve giving up their aspirations for growth, but involved “doing things differently”. There was much discussion at the EiP about the concept of “environmental capacity” or “environmental limits”, but it was generally accepted that there was not as yet sufficient data to support a policy based on such concepts. This may be an approach for future reviews. There was also discussion of the “one planet” concept and the notion of the region’s “ecological footprint” and these might also provide fertile ground for a more sophisticated policy in a future review. It is a problem, in devising a policy, that this is rapidly shifting territory.
- 3.45 During the course of the EiP, a consortium of several participants put forward a proposed climate change policy for the Region (Ref EiP/JOINT/1). The NWRA generally supported this policy, but proposed some alterations to it (Ref EiP/NWRA/4). This forms the basis of the Panel’s proposal, below.
- 3.46 We were not without concerns regarding the proffered policy however, and these were discussed at the EiP. Our attention had been drawn to Policy YH2 in the Yorkshire and Humber draft RSS, and its more practical approach appealed to some participants. We have imported some of that policy into our recommendation below.

- 3.47 We were also concerned about the intention to use the North West Integrated Appraisal Toolkit to assess plans and strategies, and the North West Sustainability Checklist for development in relation to individual schemes. We questioned two things. Firstly, relying on other documents, which might change, could be hazardous – but we received evidence that both documents were already in use (the latter in the South East as well as the North West) without problems. It was agreed – and we accept – that the use of these documents would create a “level playing field” across the region, and that they would provide a degree of predictability and consistency, which would simplify matters, for both local authorities and developers. This in part addressed our second concern, which concerned the addition of further layers to the already complex process of Development Management. This is a trap which needs to be avoided.
- 3.48 We were urged to allow for the use of other appraisal methodologies if they could be demonstrated to be sufficiently robust and rigorous. Cumbria, for example, has its own Sustainable Development Framework. Notwithstanding the attraction of a single document covering the whole of the Region, and the simplicity that would create, we think that flexibility might be applied in exceptional circumstances – the agreement of NWRA should be obtained for such departures, but we allow for them in our suggested wording.
- 3.49 The Panel were also concerned about the “North Westness” of the draft; it relies on national targets, and whilst we did not receive any evidence on which to base a variation of this policy, we do believe that in any review the question should be addressed. Is the North West starting from a different baseline from the country as a whole, and if so, should the policy be different? Nonetheless there was general support for the proposed policy.

Draft Planning Policy Statement – Planning and Climate Change

- 3.50 The draft PPS was issued half way through the EiP – after the debate which involved climate change had taken place. In paragraph 1.14 it indicates that consideration should be given as to whether emerging revisions of RSS are consistent with its objectives. The Panel wrote to all the participants in the debate which had taken place. We asked a simple question – if a policy were to be included in the RSS on climate change (bearing in mind the proposed draft policy mentioned above and the Assembly’s response to it) how should it be worded?

- 3.51 The consortium which had proposed the policy felt that it “...reasonably well anticipated the new PPS.” They did however suggest an addition to it regarding the need for carbon performance trajectories. GONW in their response suggested a similar addition. The Panel accept that – though such trajectories may or may not be in place in time to feed in to this round of RSS – at least a commitment to move in this direction should be incorporated into the policy and that it would help to ensure that RSS matches the objectives of the PPS.
- 3.52 Otherwise the response to the Panel’s question – while eliciting some general comments (which we had not sought) – indicated support for the proposed way forward, and in the light of the debate and consultation, and other comments made, we recommend as follows:

RECOMMENDATION

R3.10

DP8: Reduce Emissions and Adapt to Climate Change;

“As an urgent regional priority, plans, strategies, proposals, schemes and investment decisions should:

- **Contribute to the regional policy to reduce CO₂ emissions from all sources, including energy generation and supply, buildings and transport by 20% below 1990 levels by 2010 and 60% below 1990 levels by 2050; in particular, for residential and commercial development, by developing trajectories or other yardsticks for identifying trends in carbon performance;**
- **Take into account future changes to national targets for CO₂ and greenhouse gas emissions;**
- **Identify, assess and apply measures to ensure effective adaptation to likely environmental, social and economic impacts of climate change.**

Measures to reduce emissions might include as examples:

- **Increasing urban density;**
- **Encouraging better built homes and energy efficiency, eco-friendly and adaptable buildings, with good thermal insulation, sustainable urban drainage, green roofs and microgeneration;**

- **Reducing traffic growth, promoting walking, cycling and public transport;**
- **Facilitating effective waste management;**
- **Increasing renewable energy capacity.**

Adaptation measures might include, for example:

- **Minimising threats from, and the impact of, increased coastal erosion, increased storminess and flood risk, habitat disturbance and increased pressure on water supply and drainage systems;**
- **Protection of the most versatile agricultural land.**

Policy makers should use the North West Integrated Appraisal Toolkit to assess and strengthen the climate change mitigation and adaptation elements of their plans and strategies.

Exceptionally, other comparable and robust methodologies might be used.

Applicants and local planning authorities should ensure that all developments meet at least the minimum standards set out in the North West Sustainability Checklist for Developments, and should apply 'good' or 'best practice' standards wherever practicable."

- 3.53 In respect of the final point in the proposed policy, we do not recommend the idea - included in the draft policy - of a "Sustainability Audit" for "major" planning applications. We take the view, firstly that the creation of a formal requirement, adding another layer to the process, is undesirable (though we return to the general question of appraisal in DP9 below); second, that parts of the Checklist might apply to all schemes, not just "major" ones; and third that "major" schemes may be hard to define on an ongoing basis.
- 3.54 Many parties stressed the need for continued monitoring and review of this policy area; this seems obvious. It is a fast changing field, as we have said, and we would expect that in any review, of this or any other, RSS policy would evolve and change. We received some suggestions in this regard - for example the formation of a Climate Change Partnership. We do not make a

specific recommendation, however – we think the parties involved are quite capable of devising an effective approach.

- 3.55 Finally we turn to two matters of implementation which have been put to us, the first by the NWRA and the second by GONW, which we agree should find a place at this point in the Plan.
- 3.56 NWRA, in an amendment which they proposed to Policy DP1 (in their Briefing Paper 20), suggested an addition: “All Planning Applications over 10 dwellings, 1000 sq metres or 0.5ha should be accompanied by a sustainability statement.” This did not find much favour at the EiP. The threshold was seen by most parties as being very low, and there was concern – which we share – about introducing extra layers into the process.
- 3.57 On the other hand, if the policies on climate change and the other Spatial Principles are to have teeth, local authorities may from time to time need to request additional analysis of various sorts; the fourth bullet point in the first part of draft RSS DP1, which we mentioned earlier, also dealt with this. We include below a revision of that bullet point which allows for, but does not unduly encourage, additional analysis in appropriate cases. We appreciate the view expressed by the Assembly that unless this is a requirement, authorities will use it inconsistently or not at all, and that it is important to ensure that the provision is actually used where necessary; but we are loath to impose further formal requirements and prefer to provide local authorities with a “hook” to hang the appraisal on when it is needed. We hope it will not be neglected in cases which may have significant impacts. These would include for example any cases which have more than a local impact, or any which have likely environmental consequences in terms of increased emissions, pollution or transport impacts.
- 3.58 We also include here the proposal from GONW (in Briefing Paper 2) for a set of principles covering plan-monitor-manage, which we think is valuable.

RECOMMENDATION

R3.11

DP9: Implementation

“In addition to the statutory requirement for Environmental Impact Analysis, economic, health, transport and other impact assessments should be carried out in appropriate cases.

Plan-Monitor-Manage

Plans and policies should be sufficiently flexible to respond to robust monitoring information which will reveal whether:

- **They are having the desired impact/outcome;**
- **They are being implemented as intended;**
- **Circumstances have changed and there should be appropriate mechanisms to trigger a review of policy, if necessary.**

NWRA will work with local authorities and other partners to secure, as far as possible, a common evidence base, targets and indicators, avoid duplication and improve the efficiency of monitoring activity.

They will keep the RSS monitoring framework under constant review and annually prepare a Monitoring Manual and Monitoring Report”.

- 3.59 Various consequential amendments will need to be made to the supporting text as a result of all these changes. Among them, we agree with the suggested addition to paragraph 6.2 from NWRA (in Briefing Paper 20) which deals with the need for accessibility by public transport, walking and cycling.

RECOMMENDATION

R3.12

We recommend that the suggested addition to paragraph 6.2 in NWRA Briefing Paper 20 should be incorporated into the RSS.

CHAPTER 4 THE REGIONAL SPATIAL FRAMEWORK

- 4.1 The underlying Strategy is set out in Chapter 7 of the draft RSS, and particularly in Policy RDF1. This policy was described by GONW as “bland” – an assessment with which the Panel find it hard to disagree. GONW in their Briefing Paper 2 put forward an alternative, but this was widely criticised during the EiP as being much too long and detailed – an assessment which we also find compelling.
- 4.2 In this chapter we set out to describe the proposed RSS strategy, to discuss some of its implications (with particular reference to the City Region concept) and to make proposals for amendment.
- 4.3 There are three further issues which flow from the underlying strategy in Chapter 7 – Key Service Centres, rural policy and Green Belts – and we go on to deal with these. We also discuss the Key Diagram.

The Proposed Strategy in the Draft RSS

- 4.4 The strategy as we understand it starts from the need to maximise the growth opportunities of the three City Regions (Manchester – MCR, Liverpool – LCR, and Central Lancashire – CLCR), and particularly the two regional centres of Manchester and Liverpool themselves (however defined). The need to close the GVA gap between the North of England in general (and the North West in particular) and the South East was clearly a major imperative in selecting this starting point. It differs from the strategy in RPG13 through the addition of the CLCR – the earlier strategy concentrated on growth in the Mersey corridor and particularly the central parts of the MCR and LCR.
- 4.5 The draft RSS strategy goes on to stress growth in the other main towns and cities within the City Regions, and in the regional towns and cities outside the City Regions. The Assembly strongly stress however that this does not mean that the rural areas are excluded; they still care about Cumbria. They also argue that though the “Regeneration Priority Areas” which appeared in RPG13 are not specifically included in this Plan, they still have priority and require assistance just as they did in the earlier strategy.

The Benefits of the Strategy

- 4.6 It is argued that there are three essential benefits of this strategy.
- 4.7 Firstly it is argued that this will maximise opportunities for economic growth. It is in the three City Regions that potential exists, and if the closing of the GVA gap is to be achieved it is essential to take full advantage of these opportunities. There are no other ways of achieving this growth, and if this potential is not realised growth will simply be lost to the region. But the benefits will spread beyond the City Regions themselves to the rest of the North West.
- 4.8 Secondly, this is a sustainable approach. The City Regions are compact (or at least two of them are), movement is easy, the infrastructure exists, housing and employment are in close proximity, there is brownfield land available for development. There are substantial wasted resources – human and capital – to be utilised.
- 4.9 Third, it is in the City Regions that the largest areas of deprivation and poverty exist; providing opportunities there will help the areas of greatest need.

Disadvantages of the Strategy

- 4.10 It was argued at the EiP and in evidence that this strategy could damage the rest of the region. There were no mechanisms to ensure that the supposed benefits would spread beyond the City Regions. By concentrating on the areas that are doing well, the issues surrounding the less fortunate areas can be lost. Cumbria in particular felt excluded and were “seeking equal status”.
- 4.11 Secondly the previous Regeneration Priority Areas having been dropped would mean that places like West Cumbria would find it even harder to achieve regeneration.
- 4.12 Third, the role of towns outside the City Regions such as Crewe, Lancaster and Carlisle – though they were mentioned in Policy RDF1 - was far from clear and they too could lose out.

Questions

4.13 The Panel asked a range of inter-related questions about the strategy, based largely on the above concerns, and there was a lively but ultimately unsatisfying debate at the EiP. We were not sure that all aspects of the strategy had been thought through. We deal with some of these points below; but our main concerns are these: is the strategy clear and decisive or does it seek to “spread the jam too thinly?” Does it really want to concentrate development in the City Regions or does it want to help everybody? If the latter, is this possible?

“Balance”

4.14 The Panel asked whether the strategy achieved the right “balance” between economic, social, and environmental goals. We appreciate that this is a disreputable question to ask. We were reminded that it is quite wrong to talk about “balance” in this way – the mantra is that we should be seeking to achieve all of these things together and in a co-ordinated way – not as a contest between the three considerations.

4.15 But nonetheless many parties in evidence had raised this – in particular arguing that the draft RSS was too much led by economic considerations at the expense of social and environmental ones. It was argued with some force that GVA was not a satisfactory measure of progress and that quality of life was more important. It was suggested that the North West had a high quality of life – this was one of its advantages as compared with the South – and that going for growth could damage this. The Strategy as a whole, in its determination to achieve economic growth, failed adequately to deal with social exclusion and environmental quality.

4.16 However, others stressed the Government’s PSA2¹ target to reduce regional disparities. It was argued that the very high levels of deprivation which still remain in the region, despite recent improvements in economic performance, meant that a higher rate of growth was all important. In the context of the Cities, where most people lived, this was not incompatible with improving the quality of life. The health of the population for example would benefit from job creation and the environment could be improved at the same time.

¹ Public Service Agreement Target 2.

- 4.17 It seems to us idle to pretend that this is not an economically led strategy. Given the history of economic decline in the North West over a very long period, and the problems this has created for people in many parts of the region, it is hardly surprising that – now that signs of an upturn have at last appeared – there is a wish to capitalise on it. This might as well be clear and explicit so that nobody is in doubt about it. And we recognise the importance of the PSA2 target.
- 4.18 The question, however, is whether this can be achieved sustainably. Whenever the Panel asked questions about this, in any context, we were assured that growth would indeed be very much sustainable; it would certainly not come at the expense of social or environmental considerations. And we can see evidence that there is a relationship between the ambition for, and proposed location of, growth and social imperatives. Most jobs will be created within the urban areas where the need is greatest. We also note the potential environmental benefits of that concentration.
- 4.19 But overall we are not entirely convinced that environmental considerations have been weighed equally. We think that there is a tendency in some quarters to see the environment as a barrier to, rather than a bulwark for, economic growth. When we deal with, for example, employment sites or transport we consider this further, and we have already proposed additions in relation to climate change.
- 4.20 So our conclusion on “balance” is this. We think those who argue that the Plan is economically led are right, and we see no reason why this should be denied. We think this is justified by analysis of the region’s history and current problems and we think economic growth can, if handled properly, assist in tackling some of the severe problems of deprivation and social exclusion which remain. But we think the Plan fails in some respects to tackle the environmental arm of sustainability and we make recommendations elsewhere to deal with this.

All Things to all People?

- 4.21 The Plan attempts not only to build on the potential of the three City Regions but also to deal with the problems of the former Regeneration Priority Areas, build up the main towns outside the City Regions, and assist the rural areas. We asked whether there was sufficient prioritisation – whether it was possible to do all these things at the same time.

- 4.22 We did not receive a satisfactory answer to these questions. We received contradictory messages. For example some said it was necessary to reduce sub-regional disparities whilst raising the performance of the North West as a whole; but others thought that we should avoid focussing on reducing sub-regional disparities, which may in fact increase the North-South wealth gap; other views were that it was only by concentrating on the MCR and LCR that growth could be achieved; that "prioritisation was not clear"; that the policy that "everyone should get a little bit" was unacceptable; that each part of the region should "play to its strengths."
- 4.23 We asked the question in a different way: was the strategy too ambitious? If there was an answer to this – and several people stressed the point - it was that the strategy was right to be ambitious. This was the way to achieve the growth and development which most (but not all) people craved. This is not of course without its dangers.
- 4.24 We think there was an understandable reluctance on the part of the Assembly to state that in fact the Plan as it stands – rightly or wrongly – DOES imply a concentration on certain areas (the City Regions and in particular the cores of the MCR and LCR). This inevitably meant less emphasis (though not none at all) on other areas. We think they wanted to have their cake, in the form of City Regional growth, and their halfpenny, in the form of helping the rest of the region at the same time. We understand of course that the choice between cakes and halfpennies is a difficult one. We return to this later. But we were left with the message, as GONW put it, that the spatial framework needs to express clear priorities.

How are the Benefits Spread?

- 4.25 Given for the moment that there is in fact a concentration on the City Regions, we asked what mechanisms were proposed to spread the ensuing growth benefits to the rest of the region; again we received no satisfactory answer. Several people commented that "trickle-down" does not work. Areas are improved, it was said, by investing in them directly over a period of time, not by investing in hotspots nearby and waiting for the benefits to spread. There were references to improving communications between the City Regions and the rest (and within the City Regions) but we did not discern a convincing strategy for spreading the benefits.

- 4.26 The evidence base for the assumption that growing the City Regions will benefit the rest of the region seems to us to be lacking. This partly explains the reservations which Cumbria CC, for example, have about the strategy. We believe that much more research and examination of this proposition is required as the Strategy moves forward to review.

"Managing Decline"

- 4.27 A rather brave participant at the EiP mentioned the phrase "managing decline". His argument was that, while some parts of the Region (such as Liverpool) have had the resources, capacity and intrinsic potential to be able to turn things around, there are some areas which simply do not have those advantages. They have been declining for generations. It is foolhardy, and not even in their interests, to assume that they might now start to grow – not that they should be neglected, but we should set about managing continued decline in the most sympathetic way possible.
- 4.28 There was little appetite for this view – only relentless optimism for the future. To take one example – the CLCR Development Programme indicates that the "...size of the manufacturing sector in Pennine Lancashire is to some extent at risk..."; but it goes on to list a string of "clear opportunities" to reverse this trend, with references to the ubiquitous "knowledge industries" scattered through the document (as they were throughout the whole of the EiP). Nobody is prepared to admit anything but the brightest of futures for this and other declining areas – so long, of course, as the necessary resources are provided.
- 4.29 The Panel not only have no evidence to gainsay this accepted truth, but earnestly hope that this optimism is not misplaced. But we think the question ought to be asked - what are the implications of assuming growth in an area, spending money to support it, and then finding that decline continues? Could those resources be used in a better way? Could people's quality of life be improved in different ways? Might environmental damage result – for example by allocating land for employment development which does not materialise, by providing new transport links, or by planning for a continued increase of housing development in an area where jobs may not follow and long distance commuting may increase as a result? We believe that in any future review of the Plan these questions should be explicitly examined.

Prioritisation in the City Regions

- 4.30 It was pointed out in evidence (by GONW and others) that the City Regions cover around half the region (and much more than half the population), and that giving priority to them was hardly giving priority at all. Do we really have/should we have a “City Region approach” or do/should we have a “Core City approach”, based on the main regional centres?
- 4.31 It does appear in Policy RDF1 that priority is to be given first to the regional centres in MCR and LCR (and this seems to be reinforced by the sub-regional policies later in the RSS). Development is then directed to the “regional towns and cities” (not just their centres we were told) in the rest of the City Regions. The sub-regional policies build (rather loosely) on this but make it clear that most parts of the City Regions are covered by this definition. We think greater clarity is needed here. The burden of the debate at the EiP and of the written evidence is that it is mostly in and around the CENTRES of the two main conurbations that the potential for growth uniquely lies.

The City Regions

- 4.32 We have been discussing the Strategy so far in terms of the City Regions – but there was considerable debate in evidence and at the EiP about the relevance, significance and appropriateness of this concept.
- 4.33 The Panel understand the concept of City Regions well. We have relevant experience. They are hardly a new concept and we have no trouble at all in seeing that they form a useful – perhaps necessary – functional basis for understanding the way this or any other region works and planning for the future. They have been rediscovered recently and elevated to a fundamental instrument of policy.
- 4.34 In the North West it seemed to many participants that the concept came from the Northern Way but this was not the view of the Assembly. They argued that the policies in the Plan would have been much the same without the Northern Way or indeed without the concept of City Regions. “If we had cut it in a different way the policy would still be the same” they said. To this extent there is much less to the City Regions than meets the eye.

- 4.35 Nonetheless they invited a lot of controversy. Similes ranged for the rather predictable “string of pearls” (applied especially to Central Lancashire) to the more unexpected “magic mushrooms” (an argument that they were likely to expand and engulf bigger and bigger parts of the region). It was suggested by one critic that Authorities thought “... we had better grab a bit of this – they are the only game in town...” To such people they were as much a fashion as a sound basis for a Plan; as much a gimmick, or branding exercise, as a solid strategic principle.
- 4.36 But others argued, as we have already accepted, that they reflect the way the region operates in reality, and that however you plan a region you should base your work on the way in which people live, work and move around in actuality. The three City Regions represent this actuality, they argue, and it is hard to disagree with this view – at least in two cases.
- 4.37 So far as the MCR and LCR are concerned there is little doubt that they operate as “City Regions”, in a classical sense, with a central city spreading its influence over a surrounding area. They are, as GONW described them, the “footprint of the City”. In these cases the main arguments were about the boundaries, and in particular how far to the south they should spread. It was argued by Cheshire CC and others, especially in relation to the LCR, that they currently spread too far. West Cheshire should be a sub-region of its own; its links were as much with North East Wales as with Liverpool. We probed the reasons why this was a problem, without receiving any real answer beyond the “psychological” feeling that the area was different from Merseyside. A contrary view was put, emphasising the close relationships between Liverpool and Chester. We accept this latter view, whilst recognising that there are close cross border links, which we deal with later.

Central Lancashire City Region

- 4.38 The CLCR was an altogether more difficult proposition. Only 12% of the area is urban, we were told. It is plainly different from the other two – it is very much a polycentric City Region, if it is a City Region at all. Many doubted this. One participant, not alone in his view, said that “...to suggest it has any of the characteristics of a City Region is a misuse of language”.
- 4.39 There was much reference to the SURF Report (Strengthening the Evidence Base of Key Economic and Spatial Strategies in the North West – Ref SDL/AGMA/13). This had also cast doubt on

the concept, on the basis of considerable and objective analysis. For example they say: "Our findings lead us to question...the extent to which the Central Lancashire City Region functions as an integrated whole rather than a series of urban centres and their respective hinterlands between which there is relatively little interaction and amongst which the most dynamic is the area focussed on Preston" (page 127).

- 4.40 The issue was further discussed under Matter 9 – the Central Lancashire City Region – and the evidence submitted by Prime Resorts Ltd and Persimmon Homes made similar points – "In geographic terms we consider that the CLCR has little coherence..."
- 4.41 It is clear, and acknowledged by its advocates (and they were many, including local authorities within the area), that the CLCR in fact consists of a collection of adjoining Travel to Work Areas/Housing Market Areas. It was suggested that these rather separate areas "...only figure on the radar if they are grouped..." – a formulation which makes the CLCR sound more like a marketing concept (perhaps a very useful one) than a planning tool. Some questioned why the polycentricity of the CLCR had not been stretched a little further to encompass Lancaster – but, in the absence of any apparent desire on the part of Lancaster to be embraced by it, this was not pursued.
- 4.42 The Panel asked themselves (and the EiP) whether there were any downsides to the designation. There do appear to be some, depending on how the concept is developed. Some of them raised further controversy.
- 4.43 The first concerns the extent to which Preston should be seen as the focal point of the City Region, and development concentrated in and around the City. There was a consistent view that it was the Preston area – at the focal point of north/south and east/west communication routes – which had the greatest potential for growth within the CLCR. This might hopefully spin off into the rest of the CLCR (rather in the way that growth in MCR and LCR might spin off into the rest of the region). Though this principle was not disputed, it did seem to be a matter of degree. When, for example, Preston argued that it should be placed at a higher level in the settlement hierarchy alongside Manchester and Liverpool, as a regional centre, there was dissent from elsewhere in the CLCR (and this arose again when Preston sought a higher ranking in the retail hierarchy – we discuss both these points later). And so it seemed to the Panel that while there was a view that advantage should be

taken of Preston's favourable position, there were limits to this, particularly if it began to have an effect on the role of Blackpool, Blackburn etc. Certainly this raised issues. If Preston were to become dominant, and commuting and shopping trips into Preston were to increase from elsewhere in the CLCR as a result, this would not chime well with the RSS aim to reduce the need to travel.

- 4.44 The second concerned the relationship between East Lancashire and the MCR. It was clear (for example from the plans in NWRA Briefing Paper 1) that the level of commuting from East Lancashire, and indeed to a degree from Central East Lancashire, into Greater Manchester was as great as that to other parts of the CLCR. GONW said that "...the evidence suggests greater connectivity between those two areas [East Lancashire and Greater Manchester] than that which exists between East Lancashire and Preston" (statement, Matter 9). Authorities in East Lancashire wished to see communications improved both westwards to CLCR and southwards to MCR. Given the shortage of resources for transport improvements – quite apart from any environmental issues – this seems an ambitious aspiration.
- 4.45 So the question for the Panel is whether the definition and adoption of the CLCR as a basic component of the Plan adds value. In the end we felt that it was worth pursuing. This was not just because GONW, Northern Way, the Assembly, and NWDA were all behind it. They could all be wrong. It was for three reasons. First, we were impressed by the way in which joint working and co-operation had begun to develop and we believe this needs to be encouraged. There is not an absence of dissent amongst those involved – as we have seen – but the preparation of the CLCR Development Programme is a very useful step forward and the more that the Authorities can work together the better the end product is likely to be for the people of the area. Second we accept that the "branding" of the area is, in fact, beneficial. And third we note that the RSS would – according to the Assembly – be much the same with or without the CLCR.
- 4.46 It will be obvious however that we share some of the reservations which were expressed at the EiP. We think that in practice the CLCR consists of four separate but linked and inter-dependent units, based on Blackpool, Preston, Blackburn and Burnley. We think that the Spatial Principles of the RSS are best served if each of these is developed, within a joint

framework certainly, but as relatively self-contained units where jobs and services are provided locally as far as possible.

- 4.47 We return to this point in our recommendations on the Central Lancashire City Region later in this Report.

Equal or a Hierarchy?

- 4.48 There was a debate at the EiP as to whether the three City Regions should be seen as equal or whether there was in reality a hierarchy, with the CLCR – plainly different from the others – coming into a separate category. Everyone denied that there was a hierarchy. We were not without pleas from MCR and LCR for a return to the bi-polar approach in RPG13, and AGMA commented that there should be “...no hierarchy but there were not three equal parts.” But they did not seek the formal definition of a hierarchy and we see no need to do so; in fact and practice there is a differentiation which is bound to inform both policy and potential but beyond noting that fact we see no need for change. The descriptions which are given in paragraphs 12.3, 13.2, and 14.2 of the draft RSS seem to us to give a good indication of the relative roles of the City Regions.

A Single City Region?

- 4.49 The MCR and LCR are themselves, of course, polycentric. It was one of the notable features of the EiP that we heard so little about the large towns which surround the regional centres in those conurbations, but the reality is that they are as polycentric as the CLCR. It is true that the centres of the conurbations are more dominant than Preston is in the CLCR; and that the towns are not separated by extensive rural areas. But they operate as an interconnected network.
- 4.50 Two participants at the EiP, taking this notion further, put to us the proposition that in fact there is a single polycentric City Region in the North West, covering the whole of the MCR, LCR and CLCR. There were some rather fanciful references to the Randstad in Holland, and the Ruhr, during the discussion of CLCR. These are hardly realistic comparisons – but they become more relevant when viewing the three together.
- 4.51 This is a concept that appealed to the Panel and one which we think a future review should address. We think it might lead to a different view being taken – for example of communication priorities. It chimes well with the NWGS, as we understand it,

and might be a more effective way of trying to close the gap with the larger polycentric City Region in the South East.

The Strategy

- 4.52 It will be very clear from what we have said that we are not entirely comfortable with the strategic thinking which lies behind the Plan. For this we do not hold the Assembly entirely accountable – partly because of the timescale issue mentioned earlier, but also because they were not alone, in our view, in providing only partial answers to these rather difficult strategic questions.
- 4.53 We think that these are questions for future reviews of the RSS. We do not as a Panel think it would be reasonable, on the basis of the limited information available to us, to substitute a radically different approach, which would not have been the subject of widespread consultation.

RECOMMENDATION

R4.1

We recommend that in future reviews the following questions need to be addressed very directly:

- **What is the plan for spreading the benefits of growth in the City Regions to the rest of the North West?**
- **Are there areas where a policy of “managing decline” would be more appropriate than relentless optimism that growth will be achieved?**
- **Does the concept of the CLCR obscure other more important linkages?**
- **Is the idea of a single polycentric City Region a useful one?**

Regeneration Priority Areas

- 4.54 In RPG13 a variety of “Regeneration Priority Areas” (RPAs) had been defined. These are not explicitly mentioned in the draft RSS and a number of parties in evidence argued that they should be re-instated.

- 4.55 In fact, however, at the EiP this view did not – mostly – find favour. It was generally felt that adding another layer of designation – which did not in itself bring any direct benefits – would be an unnecessary complication. Most of the former RPAs were now within the three City Regions in any event. The most substantial areas of deprivation were in Liverpool, Manchester, Knowsley, and Salford, and the strategy – as we have said – to concentrate investment and growth in the central parts of the conurbations would help those very areas. Activity is already under way, through the Pathfinder areas for example, to tackle these problems. We do not feel that the retention of the RPAs is of value – except in two cases.
- 4.56 The exceptions are West Cumbria and Barrow. The Panel are very aware of the problems of those areas, which are profound and difficult to solve. In reality the extent to which the RSS can assist in practical ways to solve those problems is limited. But we do believe that those problems should be recognised in policy; there was a very strong wish to retain the designation of those areas and this we accept. We return to this when we deal with the Cumbria and North Lancashire Sub-Region.

The Spatial Principles

- 4.57 One of the comments which was made about Policy RDF1 at the EiP was that there was no clear link between it and the regional development principles in Policy DP1. Since in the last chapter we put forward a proposal for a new set of spatial principles based on DP1 and the GONW alternative, it is reasonable that we should look back at those to see what implications they might have for any revision of RDF1. We do not do this in detail as it might take several pages – the reader should refer back to Chapter 3. But briefly, in this context:
- Proposed Policy DP2 implies self-containment of settlements, the linking of housing, jobs and services, and reviving local economies. Proposed Policy DP3 requires sustainable economic growth and seeking to close the wealth gap with the South.
 - Proposed Policy DP4 implies developing within existing major settlements where infrastructure is or can be made available, according to a sequential approach.
 - Proposed Policy DP5 involves locating development so as to reduce the need to travel, locating development in the urban areas “where strategic networks connect”, making

development genuinely accessible by public transport, and linking areas of need to areas of opportunity.

- Proposed Policies DP6 and DP7 involve protecting the natural and built environment, safeguarding rural areas and looking after the needs of rural communities.
- Proposed Policy DP8 requires the reduction of emissions to be taken into account, inter alia by increasing urban density and reducing traffic growth.

Policy RDF1

4.58 In the light of all this it falls to us to consider how Policy RDF1 might be recast. In doing this we seek to interpret what the Assembly really intended in the original – making the prioritisation clearer. We do this, obviously, in the light of the evidence and the debate, and in the light of the spatial principles set out above. We set out first the general principles on which we have worked, with some explanation. We then set out a proposed wording for the policy itself.

4.59 We think the key principles are as follows.

4.60 First it should be made quite clear that the first priority for growth and development is the core areas of the two main conurbations. We accept for the moment the definitions set out in Chapters 12 and 13 but these should be made more explicit.

4.61 We have considered whether greater parts of the surrounding inner areas should be included. We find this immensely difficult because we do not feel we have the local knowledge to be able to put forward an alternative. There may be areas of East Manchester and Trafford Park in the MCR, or parts of inner Liverpool or Wirral in LCR which should be added. Ultimately these areas will need to be defined in LDDs.

4.62 So far as employment-creating development is concerned, however, we agree with the Assembly that the definition should be tightly drawn. This places jobs close to the places “where strategic networks connect”, and takes advantage of the opportunities which we are assured exist in the regional centres – the “key economic drivers in the region” as Policy RDF1 currently describes them.

4.63 We therefore express a second priority, which is that residential development should take place in the surrounding inner areas,

together with employment development where accessibility is good, where residential and employment areas are closely related, and where brownfield land is available. Emphasis should be placed on areas in need of regeneration and Housing Market Renewal Areas in particular.

- 4.64 The third priority for growth is in and adjoining the centres of the other cities and towns which make up the three City Regions. We have chosen not to place Preston above the others, despite its particular potential, and we have more to say about it later. But we have already indicated that we feel the four main towns in the CLCR should as far as possible be developed in a self-contained way, with a full range of jobs and services, and the minimum need to travel elsewhere. We believe the same principle applies to the towns in MCR and LCR; it is consistent with the spatial principles that employment growth should take place in the centres of those towns, and housing primarily in the inner areas which surround them, so that the need to travel is minimised and the jobs are accessible by public transport.
- 4.65 Chester is a somewhat special case because it is said to have particular opportunities for growth – but it also has a historic environment which needs protecting. We return to it later but we do not think that major expansion there fits with the spatial principles.
- 4.66 Emphasis should again be placed in this part of the policy on the Housing Market Renewal Areas and other areas in need of regeneration.
- 4.67 Development in larger suburban centres within the City Regions would be compatible with this Policy provided that they are at points where transport networks connect and where public transport accessibility is good. We refer to “larger suburban centres” at this stage; we deal with the issue of Key Service Centres below and it will be seen from that discussion that in due course it will be possible to refer to “Key Service Centres” in the context of this Policy. This will bring greater clarity but it is not a description which would be meaningful in most of the City Region areas at present (see below).
- 4.68 We have not indicated the airports as particular centres for growth, though operational development will clearly take place there on a substantial scale. In general however their edge of town locations, and surrounding Green Belts, do not fit with our spatial principles for most forms of development.

- 4.69 The fourth priority – but of a lesser scale – is the need to build up the major service centres elsewhere in the Region – notably Carlisle, Crewe, and Lancaster. These should be the focal points for growth and development in those parts of the Region.
- 4.70 Fourth equal is the need to seek to tackle the problems of Barrow and West Cumbria and in particular to encourage appropriate investment in the centres of Barrow, Workington and Whitehaven to provide employment opportunities.
- 4.71 So far as the rural areas are concerned the spatial principles clearly mean that development should be limited. We come shortly to the issue of Key Service Centres. Any development which is required to serve the needs of rural areas, including residential development, should normally be located in those centres. Otherwise, if the spatial principles are to be followed, there should be no development, beyond the strictest definition of meeting local needs, in rural areas. But we say more about this in relation to Policy RDF3 later.

RECOMMENDATION

R4.2

We recommend that Policy RDF1 should be worded as follows:

“In making provision for development, plans and strategies should accord with the following priorities:

- **The first priority for growth and development should be in the Regional Centres of the two conurbations;**
- **The second priority should be the inner areas of the two conurbations. Residential development should be located in these areas together with employment development where accessibility is good, where residential and employment areas are closely related, and where brownfield land is available. Emphasis should be placed on areas in need of regeneration and Housing Market Renewal Areas in particular;**
- **The third priority for growth is in and adjoining the centres of the other cities and towns which make up the three City Regions. Emphasis should be placed on areas in need of regeneration and Housing Market Renewal Areas in particular. Development in larger**

suburban centres within the City Regions would be compatible with this priority provided they are at points where transport networks connect and where public transport accessibility is good;

- **The fourth priority is the need to build up the major service centres elsewhere in the Region – notably Carlisle, Crewe and Lancaster. These should be the focal points for development within those parts of the Region;**
- **The need to tackle the problems of Barrow and West Cumbria is such that investment should also be encouraged in the centres of Barrow, Workington and Whitehaven to provide employment opportunities;**
- **In the rural areas development which is required to meet the local needs, including residential development, should normally be located in the Key Service Centres.”**

The supporting text should be amended to reflect the reasoning set out in paragraphs 4.60 – 4.71 above

4.72 This proposal is not so very different from Policy RDF1 in the draft RSS. But it is much more direct and we believe it sets out much more clearly the real priorities which the Assembly and most others believe should be adopted. It is not particularly similar to the GONW alternative in their Briefing Paper 2. We think that proposition, which covered virtually every part of the North West without in our view expressing clear priorities, fell into the very trap which GONW perceived in relation to RDF1 – of being all things to all people. Our option seeks not to spread the jam thinly, but to express clearly where development should take place in accordance with the spatial principles. It will not therefore be universally popular but that is not the job of RSS.

4.73 The draft RSS Policy RDF1 contained two other components – one dealing with the need for environmental excellence, green infrastructure etc, and one with the need for local services and facilities to reduce crime, improve health etc. GONW omitted most of this material from their alternative, but added other points dealing with for example the ports and airports, educational institutions, main strategic transport corridors, coast, regional parks, and Green Belt.

- 4.74 All these are important but they duplicate both the Spatial Principles themselves (which in our formulation cover many of these issues) and policies or supporting text elsewhere. The draft RSS should be read as a whole. Our choice therefore would be to omit them, and to leave Policy RDF1 as a crystal clear expression of spatial priorities.

Boundary Issues

- 4.75 A number of detailed points about the definition of the City Regions arose. For many purposes the existence of “fuzzy boundaries”, which reflect reality, is not a problem but for certain things – such as data collection, and implementation – local authority boundaries are useful. These often do not reflect the real functional position on the ground.
- 4.76 In the case of Congleton, where there was ambiguity about the position of certain settlements, we think that the whole of the District should be defined as being within the MCR for policy purposes. In the case of West Lancashire it was argued that the northern part of the District should be detached from Merseyside and seen as part of the CLCR; we see no advantage in this and are reluctant to see Districts split because of the data problems this is likely to create. Vale Royal lies within the MCR, according to the diagrams in Chapters 12 and 13, but clearly – rather like Warrington – has equally close links with the LCR, at least at its western end. We see no need to alter the draft RSS. We have already indicated that we are content that Chester remains within the Liverpool City Region.

RECOMMENDATION

R4.3

We recommend that the whole of Congleton District should be defined as being within the Manchester City Region.

We recommend that the whole of West Lancashire remains within the Liverpool City Region.

We recommend no change in respect of other boundaries.

Key Service Centres (KSCs)

- 4.77 Policy RDF2 of the draft RSS refers to Key Service Centres (KSCs). These have been defined in the Structure Plans of Cheshire, Lancashire and Cumbria (though not on a consistent basis), and the policy requires these to be updated in plans and strategies according to a brief list of criteria. They have not however been defined in the two former Metropolitan County areas and Policy RDF2 requires them to be defined in plans and strategies according to the same criteria. A number of policies throughout the draft RSS refer to the KSCs as the preferred locations for development. One of these is Policy RDF3 on rural areas, which we consider shortly.
- 4.78 NWRA, in Briefing Paper 20a, recommended that an additional paragraph in Policy RDF2, dealing essentially with the transport issues in relation to KSCs, should be omitted on the basis that the same points were covered in Policies RT1 and RT2.

RECOMMENDATION

R4.4

We recommend that the final paragraph of Policy RDF2 should be omitted.

- 4.79 The accompanying Table, 7.1 sets out a settlement hierarchy – Regional Centres (Manchester/Salford and Liverpool), Regional Towns and Cities, and KSCs; this is based on the three County Structure Plans, as mentioned above, supplemented in the metropolitan areas by a list of Regional Towns and Cities but not by KSCs. Table 7.1 thus appears unbalanced and was widely criticised at the EiP. It is essentially a list of KSCs for rural areas only. Many very substantial settlements in the metropolitan areas do not get a mention at all.
- 4.80 The Assembly had commissioned Land Use Consultants (LUC) to look at this subject and their report “Key Service Centres – Role and Functions” (Ref SDL/NWRA/09) was published shortly before the EiP opened. It was summarised in Briefing Paper 14 from the Assembly. Using a consistent set of criteria LUC had produced a suggested list of Centres. This, importantly, was based on the way places function and interact with one another; previous studies had been based on an analysis of the characteristics they display and the facilities they offer. LUC

had placed settlements in a series of rather more sophisticated categories than the draft RSS – freestanding towns, towns in a local network, towns under a strong urban influence. Their study had been the subject of limited consultation.

- 4.81 Some, but not many, participants felt that the results of this study could be fed directly into the RSS at this stage. However, the Assembly believed that this work had not progressed far enough to be incorporated in this round of RSS preparation but it would form an input to a review. In paragraph 3.4 of Briefing Paper 14 they indicated that they would support the LUC approach being taken forward in this way. Most participants agreed, and the Panel also accept this view. We do not therefore consider the study in detail, though we pick up some of the recommendations later. It is deeply frustrating that this study should have been produced so late in the process. It will, when suitably considered and refined, provide a very much better approach to this rather important policy area than is presently contained in the draft RSS. We have no choice but to try to make something of the fundamentally flawed framework which is before us and we are not happy about being placed in this position. We made our views clear at the EiP. We can only produce a temporary solution, pending the adoption of a policy based on the LUC criteria, and we do so to the best of our ability but without enthusiasm. As we said in Chapter 2, this is one of the topics which needs to be the subject of a very early review.

The Need for Table 7.1

- 4.82 There was not an agreed view as to whether Table 7.1 was needed at all. GONW in particular felt that it should be deleted and replaced by a set of criteria which could be used by authorities in preparing LDDs to define KSCs in their areas.
- 4.83 The arguments against the table were firstly that it was not a matter of regional importance – it “should not form part of an over-arching spatial framework.” Secondly that such a list would inevitably disguise subtleties and differences between settlements. And thirdly that it might “freeze” the hierarchy and not enable some centres to grow and develop.
- 4.84 The arguments in favour were, firstly, that many policies in the draft RSS were based on the hierarchy. Among others these include RDF3, W5, RT2, and RT6, plus some of the sub-regional policies. There would be a policy deficit without them. And secondly that, if left to LDDs, it would be a long time before centres were defined in some places; and more particularly

there would – however the criteria were defined - be inconsistencies across the region. The Assembly indicated that in their experience an unduly large number of centres might be defined in some areas.

- 4.85 Despite the problems, the Panel accept the second line of argument and we believe quite strongly that in principle a list should be included in the RSS. We agree that it will need to be kept under review to ensure that it is not “frozen” in time; but we do not believe it is inappropriate for RSS to include such a list – though without over-sophistication. But – for the reasons we have explained – it is not possible to arrive at a consistent and useful list covering the whole region at present.

RECOMMENDATION

R4.5

We recommend that a settlement hierarchy should be included in RSS.

We recommend that further work should urgently be carried out to enable the results of the LUC work to be fed into an early review but in the meantime a list based on an amended version of Table 7.1 should be retained.

- 4.86 We should say in passing that we found it difficult to distinguish whether Table 7.1 should be a list of “settlements”, as its name indicates, or a list of “centres” – which seems to be what the dependent policies elsewhere in the draft RSS (such as W5 or RT6) mostly require. This needs to be clarified as work progresses on the review. Our understanding is that the reference, for example, to Wigan refers to a strict definition of Wigan itself and does not cover the other centres – Standish, Leigh, or wherever, within the District. We think that, at least in the urban areas, the policy is more understandable when based on the concept of “centres”.

Non-Metropolitan KSCs

- 4.87 A solution to the present problem is to consider the metropolitan and non-metropolitan areas separately – it being in the former Metropolitan County areas that KSCs have not been defined in Structure Plans. The Assembly in Briefing Paper 14 (paragraph 3.5) supported the view that the list of KSCs in

Table 7.1 is essentially a non-metropolitan (mostly rural) list and we proceed on this basis. For the time being it is necessary to work on the basis of the former County areas rather than on the basis of the City Regions. This is because of the way in which the centres have been defined in the former Structure Plans. This should be rectified in the proposed review.

- 4.88 The definition of KSCs in non-metropolitan areas is important. Their existence will ensure that people living in those areas have access to services and facilities. They will help to provide jobs in non-metropolitan areas, will focus investment (e.g. in tourism development or affordable housing) and enable the maximum advantage to be taken of it, and they will help to avoid development in the open countryside. Above all it is in line with the Spatial Principles of the RSS, and with the suggested list of priorities we have put forward in relation to Policy RDF1, to identify the places where development can be most sustainably located, with alternative forms of transport and with housing, jobs and services co-located as far as possible.
- 4.89 We deal later with the particular circumstances of the Lake District National Park (LDNP).

RECOMMENDATION

R4.6

We recommend that the list of KSCs identified in the last two columns of Table 7.1 should be retained, pending the adoption of the LUC approach, and renamed as “KSCs in non-metropolitan areas”, and expressed pro tem in terms of the former County areas.

The list of regional centres and regional towns and cities in Table 7.1, which is largely based on the list which appeared in RPG13, should be retained but also expressed on the basis of the former County areas to match the list of KSCs.

- 4.90 We have considered whether they should be “layered” in the way they were in, for example, the Lancashire Structure Plan. It is obviously the case that the centres differ considerably in scale and influence. But we do not feel either that we have the skill and information to do this or that it is necessary at this stage. Greater levels of sophistication might be introduced in

the review, though it should guard against going into too much detail at RSS level. We believe that in the meantime authorities can take into account these differences in preparing LDDs and can produce appropriate policies which should reflect the real position and potential of each settlement.

Metropolitan Areas

- 4.91 So what of the former Greater Manchester and Merseyside County areas? We do not have a basis for determining KSCs at present – only the list of “regional towns and cities” inherited, with the addition of Altrincham, from RPG13. These refer to one, but only one, of the settlements within each authority area.
- 4.92 LUC will rescue the position in due course, but for the moment we have a vacuum. We see very little alternative but to encourage the authorities in those areas to draw up lists of KSCs, based on the approach in the LUC report. Tables 8 and 9 of that report set out lists of: “towns in a local network”, “towns under strong urban influence”, and “sub-regional urban centres”, and these should form the basis for work in those areas. There may be reasons for departing from these lists in some cases but good reasons for doing so would have to be demonstrated. The lists should form the basis for the time being for the implementation of other policies in the RSS.

RECOMMENDATION

R4.7

We recommend that until the proposed review of this policy (RDF2), KSCs in the former Metropolitan County areas should be defined through LDDs using as a basis the criteria in the LUC report and in particular the lists of centres given in that report (Tables 8/9).

The Lake District National Park

- 4.93 The question of Service Centres in the National Park was considered in some detail by the Panel which examined the Cumbria and Lake District Joint Structure Plan (CLDJSP) in 2004 (see paragraphs 2.1.18 to 2.1.29; Ref CU1c). There is no point in repeating those arguments in detail but essentially they concerned the need, on the one hand, to identify KSCs (Keswick, Ambleside and Windermere/Bowness being the

obvious choices); but on the other hand the need to avoid a situation where – by apparently identifying them as focal points for development - high levels of growth were attracted to them. That Panel put forward a policy (now ST6 in the Plan) to deal with this situation.

- 4.94 We agree with that Panel and accept that in the very special circumstances of the Lake District the CLDJSP policy should be reflected in the RSS.

RECOMMENDATION

R4.8

We recommend that a rider is added to the revised Table 7.1 which indicates that in the case of the three centres in the LDNP “development will be permitted only if it provides a service for the local community and is in scale with the local service to be provided; helps sustain a range of services in the local centre or supports local businesses; or meets other identifiable needs of the locality. It should also be compatible with Policy CNL3.”

Local Centres

- 4.95 The Assembly suggested to us in Briefing Paper 20a that we should consider recommending an additional policy to deal with smaller scale local centres. This had been considered in the LUC report (their recommendation 6) and was supported by several participants in evidence and at the EiP. There is no suggestion that such centres should be named in the RSS; they should be identified through LDDs. In this part of the Policy the distinction to be drawn is not between metropolitan and non-metropolitan areas but between urban and rural.
- 4.96 The Assembly, while not going so far as to provide the Panel with a suggested policy, nonetheless suggested the ground it might cover. It should provide a strategic framework without repeating national guidance or being overly prescriptive; provide for small scale development to take place in local centres; ensure that the amount of development reflects local circumstances and needs; and in rural areas meet the criteria set out in Policy RDF3 (to which we come shortly). There was little dissent from this view at the EiP but little further assistance to the Panel in defining the policy. We are concerned

in doing so that the policy is not so widely drawn that large numbers of centres might be so defined, consequently attracting various forms of development; we suggest indicating that only centres which already provide services of some kind to the local community should qualify, as well as stressing that development should be small scale and designed to meet local needs.

- 4.97 Our attention was drawn to a policy in the CLDJSP (ST7), which seems to us to meet these requirements, with minor changes, so far as rural areas are concerned. It does not relate to urban areas, however, and a further addition needs to be made.

RECOMMENDATION

R4.9

We recommend that an addition is made to Policy RDF2 to cover local centres. Other amendments need to be made to this Policy to reflect what we have already recommended and it should now read:

"Policy RDF2 Key Service Centres

Plans and Strategies in the former Greater Manchester and Merseyside Metropolitan areas should identify Key Service Centres which:

- **act as service centres for surrounding areas, providing a range of services which should include retail, leisure, community, civic, health and education facilities and financial and professional services; and**
- **have good public transport links to surrounding towns and villages, or the potential for their development and enhancement.**

They should take into account the recommendations of the report by Land Use Consultants entitled 'The North West Key Service Centres – Roles and Functions' dated September 2006.

Within the County areas of Cheshire, Cumbria and Lancashire the final columns of Table 7.1 set out the list of Key Service Centres as currently defined. Plans and strategies which propose any review of this list should take into account the above criteria and also the recommendations of the report by Land Use Consultants.

Local Centres

In rural areas, small scale development to help sustain local services, meet local needs, or support local businesses will be permitted in towns and villages defined as Local Service Centres in Local Development Documents which already provide a range of services to the local community. It will be the exception for new development to be located in the open countryside.

In urban areas small scale retail and employment development, and other facilities which serve local needs, should be located in local centres which are readily accessible by public transport, walking and cycling and which are close to the population they serve. They should be defined in LDDs. It will be the exception for such development to be located outside these centres."

- 4.98 It will be noted that we have suggested removing the words "the potential to..." before "...act as Service Centres..." in the first of the two criteria at the start of this Policy. We do so as recommended by the Assembly in Briefing Paper 14 (paragraph 3.6). As we have indicated however, the list of centres will need to be kept under review so as not to preclude the addition of new centres where growth is taking place, or is proposed for reasons which can be justified in relation to the principles and strategy of the RSS.

Extra Tiers and Other Changes

- 4.99 Representations were made to us to alter the lists in Table 7.1, either to move centres from one category to another or to insert an extra level between the Regional Centres and the Regional Towns and Cities.
- 4.100 An argument was put to us that Preston, as the centre of the CLCR, should be elevated to the level of "Regional Centre", alongside Manchester and Liverpool. It received some support but also some opposition, particularly from surrounding towns. We do not feel that this is a reasonable proposition. Preston is indeed the primary centre within the polycentric CLCR, but it is not dominant in the way that Manchester and Liverpool are within their City Regions. It falls a long way behind them in terms of its size, status, influence, range of facilities and its

importance within the context of the North West and the UK as a whole. We do not feel that there is a case for this change.

- 4.101 A case was also put to us for a new tier of settlements, below the Regional Centres, to include Preston, Chester and Carlisle. We were not convinced by this either. These are important centres. Each serves a particular and important function in its own way. But we see them as part of a continuum. While, as we have said (and the draft RSS proposes) Manchester and Liverpool are clearly in a league of their own, we do not think that these three stand so far out from the crowd as to justify the additional sophistication proposed.
- 4.102 We return to the question of Preston, Chester and Carlisle when we deal with retail policy.
- 4.103 A number of other changes to the hierarchy were put to us, but, because of the interim nature of the policy we propose, we do not suggest significant further alterations at this point – these matters can be dealt with as part of the development of the LUC ideas. There is however one exception to this rule. It was generally agreed during the debate on the Cumbria and North Lancashire Sub-Region that Workington and Whitehaven should be jointly treated as a “regional town” and we accept this view.
- 4.104 Paragraph 8.20 in Chapter 8 of the draft RSS refers to the KSCs but because of the problems we have described it makes little sense, especially in the urban areas. The Assembly at the EiP recommended the omission of part of 8.20 and we agree.

RECOMMENDATION

R4.10

We recommend that the words “...identified in the settlement hierarchy (Table 7.1), particularly where this will assist in the regeneration of the centre and the wider area” should be omitted from the penultimate sentence of paragraph 8.20 of the draft RSS.

We recommend that Workington and Whitehaven should be jointly shown in Table 7.1 under the heading “Regional Towns and Cities”.

Rural Areas

- 4.105 Policy RDF3 sets out a policy for rural areas. GONW in Briefing Paper 2 set out an alternative approach to this policy, based largely on the Regional Rural Delivery Framework (RRDF). The Assembly in Briefing Paper 20a suggested altering the Policy to take account of the LUC report.
- 4.106 The importance of the countryside, which we were told covers 81% of the area of the North West, contains 22% of the population, 25% of the GVA and 40% of the businesses, is not lost on the Panel.
- 4.107 The Panel have already made a number of recommendations which affect this discussion. Firstly, under the spatial principles in Chapter 3, we have proposed as part of our suggested Policy DP7 a section on "safeguarding rural areas". We see this as a response to those who believed that rural issues should be given greater prominence in the RSS. That proposal specifically suggested, however, that rural issues should be considered in an integrated way throughout the RSS and not treated separately. This arose during our discussion at the EiP on rural issues; our proposed course of action found the support of most participants.
- 4.108 Secondly, in the last part of our proposals regarding Policy RDF1, we have indicated that we believe that the Spatial Principles, if carried logically through into policy, mean that the quantum of development in the countryside should be limited. However we did indicate that we would return to it and we do so below.
- 4.109 Thirdly we have dealt in the previous section with the question of Key Service Centres, and added a proposed section to Policy RDF2 which would deal with local centres. A good deal of the debate on rural issues at the EiP was concerned with this question but there is no need to repeat that discussion here. We note that paragraph 7.4 of the draft RSS deals with this question and that it might need minor amendment, especially because of the removal of the last section of Policy RDF2 (as recommended by the Assembly).
- 4.110 As we have indicated, the GONW alternative policy was largely based on the RRDF, and it proposed that the six principles in that document should be repeated in this Policy. There was some support for this, but the Assembly felt that it was not helpful merely to re-state these principles – though it was

important to reflect the spirit of the RRDF in the RSS. Others felt that there were dangers in repeating the six principles, which on their own were somewhat simplistic; they needed to be viewed in the context of the annex to the RRDF which set out their implications in detail. For example the first principle "maximise the economic potential of the rural areas" needed further explanation and qualification.

- 4.111 We agree that repeating the six principles in policy is neither necessary nor helpful. We think the RRDF is important, but attention is drawn to it in the supporting text (it is mentioned in paragraph 7.7) and we think this will suffice; it may need to be updated as the Strategy is further developed.
- 4.112 Otherwise the GONW alternative omitted much of what is in draft Policy RDF3; but in fact at the EiP there was a good deal of support for sections of it. We prefer to revert to Policy RDF3 and to consider the points which it raises. The key issue which arose in evidence and at the EiP concerned the extent to which development in the open countryside was necessary or desirable for certain purposes.
- 4.113 As we have said, we think that the inevitable logic of the Spatial Principles is that development in rural areas, where accessibility (especially by public transport) is relatively poor and the placing of housing, jobs and services in close proximity is difficult, should be limited. The policies on KSCs and Local Centres are designed to make sure that services and facilities are available to people in rural areas in the most sustainable way possible.
- 4.114 But it is also clear for a variety of reasons that a policy which precludes development outside centres entirely is not reasonable and we heard and read a good deal of evidence to that effect. Rural businesses outside settlements need to be nurtured and encouraged (and we heard a good deal about our old friends the knowledge-based industries) and diversification sometimes needs to be promoted. But there were those who were concerned about the possible environmental effects of this and were rightly worried that any policy which facilitated the movement of employment from the towns and cities to the rural areas would be contrary to the spirit and intent of the RSS.
- 4.115 Paragraph 7.8 of the supporting text does deal with this issue. There was some debate about the wording of this paragraph at the EiP and the suggestion that the word "development" in the

second line should be replaced by “diversification” found much favour.

RECOMMENDATION

R4.11

We recommend that in paragraph 7.8 of the draft RSS the word “development” is replaced by “diversification”.

Minor alterations may also be needed to paragraph 7.4 to reflect the proposed changes to Policy RDF2.

- 4.116 But there was a desire for a clearer steer than this and our attention was drawn once again to the Cumbria and Lake District Joint Structure Plan (CLDJSP), paragraph 2.25. In our view this formulation, which has been recently approved by another Panel, provides a satisfactory way forward for the RSS, balancing the need to allow for very limited development in particular circumstances with the need to protect the countryside and ensure that development is in general properly located. We have considered whether or not this should form an extension to Policy RDF3 (or a separate policy), or simply appear (as in the CLDJSP) in the supporting text. This is finely balanced; but we conclude that it is in effect a statement of policy and should form part of Policy RDF3.

RECOMMENDATION

R4.12

We recommend the following addition to Policy RDF3:

“Exceptionally, new development will be permitted in the open countryside where it:

- **has an essential requirement for a rural location, which cannot be accommodated elsewhere (such as mineral extraction);**
- **is needed to sustain existing businesses;**
- **provides for exceptional needs for affordable housing;**
- **is an extension of an existing building; or**

- **involves the appropriate change of use of an existing building to business/employment use.”**

- 4.117 It was put to us that in order to provide for affordable housing it would be necessary to provide for open market housing too, in order to support it. However, this is seldom likely to be acceptable on rural exception sites.
- 4.118 We have considered another point which was raised at the EiP, concerning the ways in which policy for the countryside might affect different parts of the region. It was pointed out to us that there are areas of countryside in the City Regions, especially in the CLCR, and that policy needed to take this into account. There could be perverse effects if a policy designed for areas of open countryside were to be applied to rural areas close to the major towns and cities.
- 4.119 We do not think that either our proposal above or (with one exception) draft Policy RDF3 carry this danger. An addition could be made to the supporting text to make this even clearer. But this does raise the point which the Assembly in Briefing Note 20a wished us to consider. This suggested an alteration to the part of RDF3 which deals with rural areas adjacent to regional centres and sought to ensure that it did “...not undermine any KSCs within those areas, whilst acknowledging that the regional level settlements may have a role.” The Panel found this intervention difficult to follow and requested clarification, which came in paper EIP/NWRA/19. Here the Assembly suggested the following wording: “In rural areas adjacent to regional centres, towns and cities, advantage should be taken of the proximity to access services, employment and a more diverse economic base, while ensuring the viability of functioning rural communities, protecting the special qualities of rural areas, and reducing the need to travel.” The Panel, on consideration, felt that – while there is a case for making this change – the proposal was over-complex, internally inconsistent, and difficult to interpret. We consider that the original wording should remain.
- 4.120 It was also suggested to us that the definition of “sparse” rural areas (to which reference is made in the draft policy) was not clear. We have worked on the basis that the definitions of “sparse” and “less sparse” rural areas are those defined by the Government and set out, inter alia, in diagram 2 on page 7 of

the RRDF. The section on sparse rural areas in draft Policy RDF3 was welcomed and should be retained.

Green Belt

4.121 Policy RDF5 of the draft RSS and its supporting text sets out the Green Belt policy for the Region. Three main issues were identified, which were debated in the EiP session: the timing of possible future reviews of the Green Belt; the wording of Policy RDF5 in relation to “exceptional substantial strategic change” and “exceptional small scale detailed boundary changes”; and the appropriateness of specific Green Belt changes being identified in paragraph 7.21.

Timing of Future Reviews

4.122 Policy RDF5 states that there is no need for any exceptional substantial strategic change to the Green Belt and its boundaries in the North West before 2011 within Cheshire, Greater Manchester, Lancashire or Merseyside, and before 2021 within Warrington. It then sets out the process by which any future need for change should be carried forward. NWRA helpfully went through the process outlined in RDF5, clarifying that an initial study to ascertain whether a strategic change to the Green Belt was required would be the first stage in the process, post 2011 (or 2021 in Warrington). If it was determined that a change may be required this should be dealt with through future reviews of RSS. The timescales set out in the policy, and the process that needed to be carried out were discussed thoroughly during the EiP session.

4.123 NWRA explained that the timings and processes detailed in RDF5 have evolved from RPG13, Policy SD5. Various cases were put forward by participants suggesting changes to the timescales, and questions were raised as to the robustness of the evidence base.

4.124 In particular a number of parties – notably those representing the development industry – pointed out that these were long timescales. It might take up to ten years from the time a study was instituted to the time a boundary change was implemented. This was too long; needs would emerge in some parts of the Region before that (for example in Merseyside, especially for employment land). Work should commence immediately. Others, however, put the opposite view – that 2011 was too early even to consider changes.

- 4.125 Cheshire CC, Lancashire CC, MPU, AGMA and Warrington BC all supported the timescales set out in the policy and considered that it provided sufficient flexibility for their development needs. Warrington BC noted that their Green Belt boundaries were established in the Warrington UDP adopted as recently as January 2006; this had been drawn up on the basis of detailed evidence, the Policy was providing support for urban regeneration in the inner areas of the town, as well as preventing further expansion of the town into open countryside, and there was no need for a review of the Warrington Green Belt before 2021.
- 4.126 In the case of Merseyside, Policy SD5 of RPG13 had called for a strategic study of Green Belt, and this had been carried out. The conclusion from this study was that there was no need for a review and though this was disputed by some participants we did not see sufficient evidence to bring us to a different conclusion.
- 4.127 PPG2 states that the essential characteristic of Green Belts is their permanence; the emphasis should therefore be on keeping the Green Belt unaltered unless there is a strong evidence base to suggest the need for a change and we recommend that the wording of the policy is changed accordingly. But we did not hear strong evidence to suggest that the timescales in the policy were inappropriate and therefore recommend that these remain unaltered.
- 4.128 RPG13 Policy SD5 contained guidance on the content of the Green Belt studies, and it was suggested that this text might usefully be included in the RSS. We consider this unnecessary and are satisfied that paragraph 7.20 of the supporting text contains sufficient guidance on the review process.
- 4.129 North West Environmental Link (NWEL) were concerned that the presumption against review of the Green Belt was not clear in Policy RDF5. We note that paragraph 7.20 states that it is anticipated that future development in the North West, as set out in the RSS, can generally be accommodated without the need for strategic reviews of the Green Belts in the North West. We agree that the policy could be strengthened in this regard and recommend accordingly.
- 4.130 GONW (in paper 395/2C, submitted after the relevant debate) suggested changes to the part of the policy dealing with timescales. We think these would alter the meaning of the policy

in a way which was not considered at the EiP. We prefer the NWRA approach.

Exceptional Substantial Strategic Change and Exceptional Small Scale Detailed Boundary Change

- 4.131 Policy RDF5 refers to “exceptional substantial strategic change” and, later, to “exceptional small scale detailed boundary changes” which should be dealt with through LDFs. This led to a number of representations and a considerable debate, which seems to us to stem from confusion over the RSS’s role with regard to Green Belt issues. This may have arisen following the abolition of Structure Plans, and a certain lack of clarity over the respective roles of their successors.
- 4.132 In our view the role of the RSS is to set the general extent of the Green Belt. Any strategic changes to the Green Belt which would impact on its underlying principles and functioning should be dealt with through the RSS. Smaller scale boundary changes that would not impact on the general extent of the Green Belt should be dealt with at the LDF level. However it is not always easy to draw this distinction.
- 4.133 Several participants considered that “substantial” should be removed from the policy where it appears, as it is unnecessary and misleading, while others considered that the phrase needed further definition. Just what type of change is of size and scale that would constitute a regional, or alternatively local level review will vary greatly with location and impact on the Green Belt’s function and principles. This will need to be a decision made by NWRA and local authorities in consultation. There was a suggestion that a threshold could be defined which would separate the substantial from the small scale. But it was argued – and we agree – that there is more to this decision than mere size; sometimes small changes will be important, at other times bigger changes may be less significant.
- 4.134 We feel that by removing the word “substantial” there will be even less clarity over how a certain type, size and scale of Green Belt change will be dealt with. We therefore recommend that in this respect Policy RDF5 remains unaltered.

Paragraph 7.21

- 4.135 The debate about substantial/small scale changes was further developed in relation to the inclusion of specific development proposals in paragraph 7.21. This referred to the need for

possible “small scale localised changes” to accommodate “operational aviation-related requirements” at the two main airports, or an employment site at Chester (which we consider elsewhere). The issues surrounding the airports and any related changes to Green Belt boundaries are dealt with in Chapter 7 of this report. Paragraph 7.21, perhaps oddly, did not mention another proposal in the RSS which might involve a change to Green Belt boundaries – at Newton-le-Willows - which we also consider elsewhere. As we have mentioned, the issue of whether it is appropriate to examine a change to the Green Belt boundary at the regional or local level can be a grey area in some situations, highlighted for example by these possible changes.

- 4.136 No clear solution to this dilemma was forthcoming during the EiP debate, but CPRE did put forward a proposal (EIP/CPRE/4) which posited that where a proposal was put forward which was not small scale it might nonetheless be dealt with through LDFs so long as NWRA were first consulted and if they so decided, conducted a study into the proposal. NWRA considered this to be a useful contribution but had concerns about the need for a study to be carried out.
- 4.137 On consideration we feel that the distinction between “small scale” and “not so small scale” proposals is inappropriate. We feel that it is complex and confusing; but more importantly that it is impossible to draw a distinction which would enable Authorities accurately to determine which scheme falls into which category. We are attracted by the CPRE formulation (though we agree that the reference to a study is unnecessary – NWRA can of course decide to carry one out if they feel it is needed but there is no need to enshrine this in policy). But we feel that the reference to NWRA should take place in relation to *all* schemes, except those referred to in paragraph 4.138 below. After all, NWRA will have a view to express when such proposals find their way into draft LDDs; they will need to indicate whether in their view they comply with RSS. So they may as well be consulted at the outset. This removes all room for doubt and should streamline the process. We so recommend; and we think this should form part of the policy and not merely the supporting text. But we think it should be made clear that agreement will not be unreasonably withheld.
- 4.138 In the light of this we believe that paragraph 7.21 should be deleted and replaced with text which includes an explanation of the three (subject to our later recommendations) situations which may require site specific boundary changes (Manchester

and Liverpool John Lennon Airports and the possible inter-modal freight terminal at Newton-le-Willows), and also state that other future changes should be assessed by NWRA on a case by case basis to ascertain whether they can be examined through the LDF process.

4.139 In the light of these comments we recommend as follows:

RECOMMENDATION

R4.13

Policy RDF5 – Green Belt

Amend the third paragraph by replacing existing paragraph with:

“After 2011 the presumption will be against exceptional substantial strategic change to the Green Belt in Cheshire, Greater Manchester, Lancashire or Merseyside. If potential changes are identified they should be investigated by strategic studies, undertaken by NWRA, together with the relevant local stakeholders. The findings will inform future reviews of RSS and subsequent reviews of plans and strategies.”

Add the following paragraph:

“Local Development Frameworks may provide for detailed changes in Green Belt boundaries to accommodate the expansion of Manchester Airport and Liverpool John Lennon Airport; and to provide for an inter-modal freight terminal at Newton-Le-Willows. Subject to the agreement of NWRA, any other local detailed boundary changes should be examined through the LDF process.”

Paragraph 7.21

Delete paragraph 7.21 and replace as follows:

“Three proposals that may necessitate detailed boundary changes are currently contemplated (though not yet agreed). These are for the expansion of Manchester and Liverpool John Lennon Airports (in accordance with the relevant Airport Master Plans); and for a possible inter-modal freight terminal at Newton-le-Willows. Other

proposals of a similar nature may come forward during the lifetime of the RSS.

Authorities considering the inclusion of such further changes in LDDs should consult NWRA who will determine whether they are matters which can be dealt with at local level. Such agreement will not be unreasonably withheld.”

The Key Diagram

- 4.140 Little enthusiasm was expressed for the Key Diagram as it stands, in evidence or during the EiP. However, a bewildering range of suggestions was put forward for additional items to be included, items which could be excluded, suggestions for other diagrams, and suggestions regarding the size of the diagram.
- 4.141 We have already indicated that we believe the RSS would benefit from the inclusion of a number of maps setting out some of the considerations and constraints which lie behind the RSS, rather in the way the Yorkshire and Humber Plan does. This would satisfy many of the comments which were made during the discussion of the Key Diagram.
- 4.142 We believe the Key Diagram should aim to convey the strategy itself. From the items on the present diagram and selecting from those put forward by participants we suggest showing, as clearly as possible, the City Regions, Green Belts, main areas for growth, main transport interchanges and corridors, ports and airports, and the shopping hierarchy in Policy W5. This is to some degree a matter of cartography and it may be that some of these items – such as Green Belts – should be shown on the separate plans which we recommended in Chapter 3. We do not think it need include all the KSCs. Presentationally we think the North East Plan does this well. We would, as Cheshire CC and others suggested, recommend also showing the main areas of linkage beyond the region (Yorkshire & Humber offers a model for doing this).

RECOMMENDATION

R4.14

We recommend that the Key Diagram is revised as described in paragraph 4.142 above.

4.143 We deal with the sub-regional diagrams later in this Report.

4.144 The Key Diagram is important – for many parties, as was pointed out during the debate, it is seen as a potential way of understanding the main thrust of the strategy. No doubt, once again, the lack of time for preparation has made this difficult in this case but we hope that a clearer and more user-friendly version can be produced following our report.

CHAPTER 5 WORKING IN THE NORTH WEST

Objectives

- 5.1 Chapter 8 of the draft RSS sets out spatial policies for the region's economic development, dealing particularly with employment, retailing and tourism (including casinos). As indicated in Chapter 3 above, we consider that it should open with a clear statement of thematic objectives, which should reflect the overarching spatial principles.
- 5.2 Specific objectives were suggested to us by GONW. These were derived mainly from paragraph 5.3 of the draft RSS, condensed to avoid duplication and in the interests of brevity. They were not seriously disputed at the EiP, and we consider them to be broadly appropriate.
- 5.3 We agree that the RSS should aim to strengthen the regional economy (in line with the Government's objectives and the Northern Way Growth Strategy), and should provide a spatial framework for the programme set out in the Regional Economic Strategy (RES). However, as the RSS is not site specific, it would not be appropriate for it to identify (or endorse) the 25 Strategic Regional Sites listed in the RES. Nevertheless, the RSS should make provision for a supply of land to ensure that the sustainable development of the regional economy is not constrained. As explained below, rather than identify significant development opportunities, we consider that the RSS should establish the criteria that will be applied in the identification of such opportunities in local development frameworks, and in the exercise of planning control over development proposals.

RECOMMENDATION

R5.1

Economic Objectives

The following text should be inserted after paragraph 8.1 of the draft RSS:

"The RSS supports the economic programme put forward in the Regional Economic Strategy. It seeks generally to strengthen and regenerate the regional economy, address problems of worklessness, and reduce the need to travel, in line with the overarching

spatial principles set out in Policy DP1. Specifically, it will:

- **Support the business sectors identified in the RES;**
- **Make provision for a supply of employment land to ensure that sustainable economic development is not constrained;**
- **Establish criteria for the location of regionally significant economic development;**
- **Promote strong and viable centres, as locations for the concentration of retail, office and recreational development;**
- **Support the sustainable diversification of the rural economy; and**
- **Harness the economic development potential of tourism in preferred locations.”**

5.4 The general approach to strengthening the regional economy is set out in Policy W1 of the draft RSS. This accords broadly with the RES. The Assembly suggested that the sixth bullet point in this policy should be modified by the inclusion of a reference to the opportunities for economic growth generated by Barrow and Carlisle. We consider that such a reference would be misplaced in a point that deals primarily with the rural economy; but in our view, a separate reference should be made to the opportunities for economic development in the regional cities of Carlisle and Lancaster, and for regeneration in Barrow and the coastal towns of West Cumbria. We have reservations about the reference to Chester in the fifth bullet point of Policy W1, but deal with this in detail in paragraphs 5.36-5.39 below.

RECOMMENDATION

R5.2

Policy W1

A further bullet point should be inserted after the fifth bullet point in Policy W1 to read as follows:

“Realise the opportunities for sustainable development to increase the prosperity of Carlisle and Lancaster, and to regenerate the economies of Barrow and the coastal towns of West Cumbria.”

Employment Land

Present Position

- 5.5 There is no immediate shortage in the aggregate amount of employment land¹ identified for development in the North West. Paragraph 8.8 of the draft RSS records that the region currently has some 5,795ha of land committed to employment development, through development plan allocations and outstanding planning permissions. At the present average regional take-up rate of approximately 313ha a year, this amounts to about a 19 year supply. In Cheshire, where the average take-up rate is little more than 40ha a year, it could take up to 28 years to exhaust the present supply of committed employment land. In Cumbria, the supply would last for more than 30 years at the current average take-up rate of about 16ha a year.
- 5.6 The provision of so great a supply of employment land is understandable. Planning authorities have been keen to encourage new sources of employment to compensate for the decline in the region’s traditional economic activities in the second half of the twentieth century. However, an over-supply of employment land does not necessarily result in economic development or the creation of new jobs. In our view, it may give rise to problems.

¹ Employment land is defined as being for business, industrial or storage/distribution uses, within Use Classes B1, B2 or B8.

- 5.7 First, it may sterilise land that could be used for other desirable purposes. Employment allocations which cannot realistically be taken up in the quantities envisaged during the lifetime of the development plan may amount to a wasted resource, and should be reviewed. In this connection, paragraph 44 of PPS3 enjoins local authorities to consider whether sites that are currently allocated for industrial or commercial use could be more appropriately re-allocated for residential development.
- 5.8 Second, in order to plan the provision of new housing and infrastructure (including transport facilities, water supply and sewage treatment capacity) it is necessary to make assumptions about the likely quantity and location of employment development during the plan period. This becomes especially difficult if an excessive amount of employment land is identified. It could result in a wasteful and poorly coordinated investment of public and private resources.
- 5.9 Third, in assessing the environmental impact of the development plan, it is reasonable to assume that its development proposals will come to fruition. The Assembly have concluded that an Appropriate Assessment of the draft RSS will be necessary, in accordance with the requirements of the Habitats Directive. This is partly because the proposed employment development policies are likely to have a significant effect on certain European sites. It is at least arguable that an overprovision of employment land could unnecessarily affect the result of the Appropriate Assessment, and thereby prejudice the proposed review of the RSS.

Proposed Provision

- 5.10 Table 8.2 of the draft RSS quantifies the proposed provision of employment land, but currently applies only at the sub-regional and local level. We concur with the view (expressed by CPRE and others) that Table 8.2 should refer to all employment land, so as to provide a measure of the total provision that is likely to be needed across the region.
- 5.11 We note that in Row A of Table 8.2, the current supply of committed employment land excludes strategic regional sites. However in Row B, the current average annual take-up rate (which forms the basis for the projected requirement to 2021) includes development on strategic regional sites.

We consider this approach to be inconsistent and flawed. It should be rectified by including all committed employment land in Row A. In our recommended revision to Table 8.2 below, we have used the totals for all committed employment land (as at 2005) as set out in the Assembly's Briefing Paper 15a, with one modification.

- 5.12 It was put to us that the current land supply figures are unrealistic, as they include allocated sites that are unlikely to be brought forward for employment development, for instance because of high land values, access problems or inadequate infrastructure. However, we were provided with no quantitative evidence on this point, except in relation to sites at Stanlow and Ince Marshes, which have a combined area of about 320ha. It was argued that these large sites are unlikely to be developed for general employment use, being suitable only for petrochemicals and associated development. In view of this, they distort the supply of committed employment land in Cheshire. We understand that part of the area in question is now proposed for development as a waste management facility. In recognition of these circumstances, we have decided to reduce the committed employment land figure given for Cheshire in Briefing Paper 15a by 320ha. If other existing employment land allocations are unrealistic, it will be for local planning authorities to remove the relevant allocations when they prepare their Local Development Frameworks.

Modelling Future Requirements

- 5.13 The Association of Greater Manchester Authorities (AGMA) and others argued that current take-up rates provide an unsatisfactory basis on which to assess future employment land requirements. In particular this approach fails to reflect the step change in economic activity that will result from the Northern Way Growth Strategy and the transformational actions proposed in the RES. AGMA promoted use of their Greater Manchester Forecasting Model (GMFM), which predicts employment growth on the basis of an assumed increase in GVA.
- 5.14 The GMFM provides an integrated approach to the assessment of future development requirements, and could provide a useful tool in the preparation of future reviews of the RSS. However, we have seen no output from it that would enable us to assess the amount of additional land that will be needed to support economic development in the

whole of the North West up to 2021. We accept that there is no wholly satisfactory model for forecasting future employment land requirements; and that the simple extrapolation of current take-up rates would merely reflect (and perpetuate) today's economic circumstances.

- 5.15 However, in Row C of Table 8.2 of the draft RSS, the present take-up rates are adjusted to simulate the effect of increased economic activity. The adjustments are on the basis of economic growth scenarios prepared by Regeneris Consulting for the review of the RES. For each sub-region, the scenario used is that which indicates the highest level of employment (the "recent success" scenario in Cumbria and Merseyside; the "transformational" scenario elsewhere). This "pick and mix" approach was criticised by AGMA, and we share their concern that it entails a degree of inconsistency.
- 5.16 But we attach even greater importance to the fact that the housing requirements in the draft RSS are based on a compromise between the "long term" and the "recent success" scenarios, implying a lower level of employment than has been used in the assessment of employment land requirements. We think it wholly wrong that economic and housing policies should rest on contradictory assumptions about employment growth. For reasons explained elsewhere in this report, we consider the assumptions on which the housing policies are based to be reasonable. We therefore consider that the adjustment of take-up rates in Row C of Table 8.2 should be no greater than is implied by the "recent success" scenario.
- 5.17 In this connection, we note that the scenarios are not forecasts, but describe a range of plausible outcomes. There is no reason to believe that the "transformational" scenario is any more likely to be realised than either of its less ambitious counterparts. However, if monitoring shows a "transformational" increase in the rate at which employment land is being taken-up, there will be an opportunity to revise the employment land requirement at a future review of the RSS.

Future Take-Up Rates

- 5.18 The adjustment of take-up rates in Row C of Table 8.2 assumes that every 2% increase in GVA will result in a 1% increase in the rate at which employment land is taken up. We asked whether this assumption was supported by any

empirical evidence, but none was disclosed to us. CPRE felt that a ratio of 4:1 might be more appropriate, and we have some sympathy with their argument on this point. Land is but one factor of production. With the development of knowledge-based industry and services, it seems to us that increases in GVA are likely to owe much to increased capital investment (in information technology, telecommunications, automation and so on) and to improved labour skills and productivity. It is not clear that an increase in GVA will require a substantial growth in the take-up of employment land. In fact, the evidence in Table 8.3 of the draft RSS suggests that there is likely to be a continuing reduction in the amount of land used by the region's manufacturing industries, which will far exceed the amount of land required for new employment development.

- 5.19 Nevertheless, in the absence of reliable quantitative evidence about the relationship between the growth of GVA and the take-up of employment land, we are reluctant to propose any modification to the assumption made in Table 8.2. In our recommended revision to Table 8.2 below, we have adopted the projected increase in take-up rates appropriate to the "recent success" scenario, as shown in the Assembly's Briefing Paper 26.

Flexibility

- 5.20 Row E of Table 8.2 sets out a "flexibility factor" which has the effect of adding between 20% and 33% to the employment land requirement for each sub-region. This was not seriously challenged at the EiP, and seems to us to be broadly acceptable. We are not persuaded that there is a need to phase the release of employment land, as currently indicated in Table 8.2, since the bulk of the land likely to be required for development up to 2021 is already committed. We recognise that, exceptionally, there may be a need to provide additional land to take account of special circumstances, such as the expansion requirements of a particular business or the realisation of significant inward investment potential. These might be material to the consideration of particular planning applications, but cannot easily be accommodated in regional spatial policy.
- 5.21 GONW expressed concern about the inflexibility of specifying precise figures for the amounts of employment land required. We agree that long term forecasting is fraught with uncertainties, and the projections can be no more than

approximations. However, we consider that the expression of requirements in the form of a range for each sub-region would cause uncertainty. A “plan, monitor and manage” approach should be adopted, in which the RSS would be subject to regular review and adjustment in the light of monitoring.

RECOMMENDATION

R5.3

Table 8.2

Table 8.2 of the draft RSS should be modified as follows:

Table 8.2: Regional Provision of Employment Land 2005-2021 (hectares)

	Greater Manchester	Merseyside and Halton	Lancashire	Cumbria	Cheshire & Warrington	North West
2005 supply	1,368	1,234	1,069	633	1171	5,476
Current take-up p.a.	112	76	68	16	41	313
Projected increase in take-up	6%	18.5%	4.25%	17.5%	6%	9.22%
Projected take-up p.a.	119	90	71	19	43	342
Flexibility factor	20%	20%	20%	33%	27%	-
Supply req'd (yrs)	18	18	18	20	19	18.24
2021 need	2,142	1,620	1,278	380	817	6,237
Extra allocation required	774	386	209	-253	-354	761

Disaggregation of Future Requirements

5.22 A number of participants were critical of the fact that the sub-regions in Table 8.2 are not aligned with the proposed city regions. Others felt that employment land requirements should be disaggregated to the level of individual local planning authorities. We share these concerns. We are particularly concerned that the allocation of appropriate sites for employment development (and the reduction of existing commitments where there is currently a surplus of

employment land at the sub-regional level) will depend upon a considerable degree of joint working and cooperation between local planning authorities, as indicated in paragraph 8.12 of the draft RSS. If this fails to transpire (as may well happen in certain areas) there could be a serious over- or under-provision, particularly if LDDs covering different parts of a sub-region come forward in isolation from one another.

- 5.23 At our request, the Assembly suggested alternative methods for apportioning RSS employment land requirements between local planning authorities (see NWRA Briefing Paper 7). Their first suggested method was to allocate employment land between districts in accordance with distribution factors derived from the North West Household Growth Estimates Study. This seems to us to be a rather mechanistic approach, which would tend to reinforce the existing concentrations of development. The Assembly's second suggested method was to carry forward the pattern of distribution proposed in existing Structure Plans. However, this method could not be applied consistently across the region, since the Cheshire Structure Plan makes no apportionment of employment land between districts, and the remaining Structure Plans cover only Lancashire and Cumbria.
- 5.24 The third approach suggested by NWRA would rely on a policy-led apportionment of land for employment development between districts. In our view, such land should be distributed in accordance with the spatial principles summarised in Policy DP1, as proposed above. In particular, regard should be had to the need to foster sustainable relationships between homes and workplaces; the need to marry opportunity and need; the need to make best use of existing infrastructure; and the need to reduce the requirement to travel.
- 5.25 Of course, much will depend on the distribution of existing commitments, the extent to which committed sites accord with the spatial development principles, and the extent to which there may be scope to change existing commitments. In the absence of the necessary data, we are unable to recommend a figure for each local planning authority area. However, we consider that this problem should be addressed now or, if necessary, in an early review of the RSS.

RECOMMENDATION

R5.4

Disaggregation of Employment Land Requirement

The RSS should contain employment land requirements disaggregated between local planning authority areas on the basis of the spatial development principles set out in Policies DP1 and RDF1 above.

- 5.26 Table 8.3 of the draft RSS contains an assessment of future changes in employment land by Use Class. However, it gives no guidance on the amount of land that should be allocated for employment development. We consider that it serves little purpose in policy terms, and could be a source of confusion. A number of participants sought its deletion, and the Assembly did not strenuously resist this. We agree that it should be deleted.

RECOMMENDATION

R5.5

Table 8.3

Table 8.3 should be deleted from the RSS. The second bullet point in Policy W3 (which refers to Table 8.3) should be deleted, as should the bracketed reference to Table 8.3 in paragraph 8.10.

- 5.27 In the light of the above considerations, Policy W3 should be further modified to apply generally to the supply of land for employment development. Among other things, this will make it clear that new office development should be concentrated in established centres, in accordance with PPS6. At present, the draft RSS appears to imply that this requirement applies only to schemes of sub-regional or local importance.

RECOMMENDATION

R5.6

Policy W3

Policy W3 should be entitled Supply of Employment Land.

The introduction to this policy should be modified to read:

“Provision should be made for a supply of employment land as outlined in Table 8.2. Local planning authorities should undertake a comprehensive review of commitments, to secure a portfolio of sites that complies with the spatial development principles outlined in Policies DP1 and RDF1, and ensures ...”

Quality of Employment Sites

- 5.28 Although there is no immediate quantitative shortage of employment land in the North West, it was put to us that there are currently serious shortcomings in the quality and location of supply. Furthermore some committed sites may not be (and may not become) genuinely available for development, for instance as a result of land ownership problems, access difficulties, or deficiencies in the provision of infrastructure. We note particularly that, despite the numerical over-provision of committed employment land in Cumbria and Cheshire, opportunities for employment development are scarce in some parts of these counties. However, we do not accept the view of some participants that a negative requirement for additional employment land in the RSS would send out the wrong message.
- 5.29 It seems to us that the solution is for local planning authorities to review committed employment sites that are of poor quality, poorly located, or unlikely to become available for development within the foreseeable future. Neither the continued allocation of such sites in development plan documents, nor the renewal of expiring permissions for their development, is likely to be justified. Policies W3 and W4 of the draft RSS refer to a comprehensive review of employment sites, and we strongly support this. Without it,

there is a danger that a legacy of unsatisfactory committed sites will frustrate attempts to secure a more sustainable pattern of employment development. A substantial reduction in the quantity of committed employment land in Cumbria and Cheshire would provide scope for the allocation of new sites that are capable of delivery, in sustainable locations.

RECOMMENDATION

R 5.7

Release of Allocated Employment Land

The following should be inserted after the first sentence of paragraph 8.14 of the draft RSS:

“Where allocated employment sites are of a poor quality, poorly located, or unlikely to become available for development within the foreseeable future, local planning authorities should remove the allocations in question in the relevant local development documents.”

Location of Employment Land

- 5.30 Policy W2 of the draft RSS encourages regionally significant economic development in the 26 broad locations set out in Table 8.1 and shown on the Proposals Map. Most of these broad locations contain one (or more) of the Strategic Regional Sites identified in the Regional Economic Strategy.
- 5.31 NWDA supported the approach adopted in the draft RSS. They told us that a number of the Strategic Regional Sites are committed by development plan allocations and planning permissions. Some are under construction. Daresbury has been identified by the Government as one of two sites in the UK for science and innovation, and this should be recognised in the RSS. A number of the broad locations shown in the draft RSS are close to deprived areas.
- 5.32 There was concern that a criteria based policy for site selection would fail to establish regional priorities and could lead to over-provision, with numerous potential sites coming forward. Such an outcome might result in a high volume of unstructured applications for funding, through the NWDA and

the Regional Funding Allocation, which could give rise to difficulties. It was also pointed out that some committed sites within the broad locations shown in the draft RSS were being developed in phases. If these locations were now removed from the development plan, investment to complete these developments might not be forthcoming.

- 5.33 Nevertheless, the justification for the choice of the broad locations shown in Table 8.1 is not altogether clear to us. Although these are broad locations, it was made clear to us that, in most cases, sites have already been identified and are included in the RES. In many cases they already have planning permission or are allocated in development plans. While it is not for us to comment on individual sites, it is nevertheless apparent that some of them would not comply with the spatial development principles and the regional development framework which we recommend in Chapters 3 and 4 above.
- 5.34 Furthermore, it is not clear why some areas have been chosen as broad locations for regionally significant economic development, while others have been passed over. For instance, NWRA indicated that there are potential economic development sites in the northern part of Greater Manchester which, taken together, are of equivalent importance to those in South Manchester. If that is so, it is difficult to see why no locations in, say, Bury, Bolton or Wigan have been included in Table 8.1.
- 5.35 Similar inconsistencies arise elsewhere. For instance, it is not clear to us why the Samlesbury area or North Liverpool have not been identified as locations for regionally significant economic development. BAe Systems told us of their plans for a substantial expansion of their business at Samlesbury. The Merseyside Policy Unit drew our attention to the potential that exists in the Atlantic Gateway and Approach 580 Strategic Investment Areas in North Liverpool and Knowsley. These were identified (in the Merseyside Objective 1 Programme) to provide major opportunities for employment development close to areas of great social need. The same applies to the St Helens Strategic Investment Area, which is also excluded from the broad locations for regionally significant economic development shown in the draft RSS.

Chester

- 5.36 By contrast, the draft RSS identifies Chester as a location for an unspecified amount of regionally significant economic development. However, the evidence is that there is already an excessive supply of land committed for employment development in Cheshire. Chester has a relatively tight labour market, with a local unemployment rate of only about 1.7%. The city attracts substantial numbers of commuters. The Highways Agency reported that, in the Chester area, the M53 and A55 are already subject to more than 100% stress during the morning and evening peak periods. They expect conditions to worsen in future.
- 5.37 Housing in Chester is relatively expensive. Much of the city is worthy of conservation. A Green Belt, which serves to protect its setting, restricts its outward growth. The expansion of the built-up area is also constrained by the flood plain of the River Dee. In view of these considerations, opportunities to provide additional housing in Chester must be limited.
- 5.38 We therefore consider that the location of further regionally significant economic development at Chester would be likely to result in additional commuting and traffic congestion, contrary to the objectives of reducing the need to travel and reducing carbon emissions. Unlike economic development in, say, North Liverpool, it would fail to match opportunity to need. It would be likely to give rise to additional pressure for inappropriate development in the Green Belt, and might well detract from the conservation of Chester's historic fabric. In this connection we note that, in an analysis prepared by the Assembly's consultants, the extension of the Chester Business Park (which is proposed as a Strategic Regional Site in the RES) scored only 24% for sustainability. By comparison the proposed extension of the Wavertree Technology Park in Liverpool scored 95%.
- 5.39 We were told by NWDA that Chester is especially attractive to certain types of business, which might not be prepared to locate elsewhere in the North West. In support of this argument, they referred to the fact that Chester provides an environment that is much sought after by "executives and their wives", and offers the additional advantage of proximity to Manchester Airport. We consider the importance of these points to be overstated, and do not accept that they should shape planning policy. In our view, it is most desirable that

regionally significant economic development should assist in the regeneration of inner city areas, reduce the need for long journeys to work, and provide jobs in areas of high unemployment. Regionally significant development at Chester would contribute to none of these objectives. For these reasons, we do not consider that Chester provides a suitable location for additional regionally significant economic development.

RECOMMENDATION

R5.8

Policy W1

The words “particularly focussed around Chester” should be deleted from the 5th bullet point in Policy W1.

A Criteria-Based Policy

- 5.40 We do not consider that regionally significant economic development in the broad locations listed in Table 8.1 of the draft RSS would necessarily provide the optimum outcome in terms of the overarching spatial principles set out in Policy DP1. For this reason, we consider that the broad geographical locations shown should be abandoned. Instead, Policy W2 should establish criteria to guide the allocation of land for economic development in local development frameworks.

RECOMMENDATION

R5.9

Table 8.1

Table 8.1 should be deleted.

- 5.41 Criteria-based replacements for Policy W2 were suggested by AGMA² and CPRE. We consider that each of these contains much of merit. The spatial framework set out in Policy RDF1 dictates that it is no longer appropriate to plan for a dispersed pattern of development, in which new employment uses are provided on extensive greenfield sites, remote from labour supplies, and dependent largely on access by car. Rather, employment development should contribute to the regeneration of urban areas, help ease problems of deprivation and worklessness, and make full use of existing and proposed public transport facilities. This would make best use of existing assets, ease congestion, help limit carbon dioxide emissions and improve public health.
- 5.42 AGMA and MPU both argued that economic development should be concentrated in inner city areas. We concur. In addition, it should exploit opportunities associated with higher education and research facilities, and major transport interchanges (including ports). In our view, in accordance with the spatial principles that underpin the RSS, the focus for future regionally significant employment development should be close to transport nodes within the urban areas of the Manchester City Region (including Warrington); Merseyside (including Ellesmere Port and Halton); the Central Lancashire City Region; Crewe; Lancaster; Carlisle; and the Priority Regeneration Areas of Barrow-in-Furness and West Cumbria.
- 5.43 Allocated sites should be capable of development within the RSS plan period, having regard to environmental capacity, the condition of the land, its availability, its attractiveness to the market, and the need for additional infrastructure. Their development should not have a serious adverse effect on the amenity of adjacent land uses, for instance in terms of access, traffic generation, noise or pollution. They should be capable of supporting good quality, environmentally sensitive development.
- 5.44 Office development should be focussed in or adjacent to city and town centres. Knowledge-based services should ideally be clustered close to universities, major hospitals or other significant research establishments. Knowledge sector manufacturing (characterised by low-volume, high-value output) should also be well connected to these facilities. Regionally significant manufacturing and logistics sites

² See SDL/AGMA/27

should have good access to the primary freight transport networks.

- 5.45 We consider that a separate policy should make provision for development of inter-modal freight terminals. They have very specific locational requirements, which depend largely on the alignment and operation of freight transport networks. Decisions about their distribution should not necessarily be subject to the policy criteria that are applicable to other forms of economic development.

RECOMMENDATION

R5.10

Policy W2

Policy W2 should be recast as follows:

“Locations for Regionally Significant Economic Development

Regionally significant economic development (other than inter-modal freight terminals) will be located close to transport nodes within the urban areas of:

- **The Manchester City Region (including Warrington);**
- **Merseyside (including Ellesmere Port and Halton);**
- **The Central Lancashire City Region;**
- **Crewe, Lancaster and Carlisle; and**
- **The Priority Regeneration Areas of Barrow-in-Furness and West Cumbria.**

Sites will be identified in local development documents, having regard to the spatial principles in Policies DP1-8 and the priorities in Policy RDF1. They should be:

- **Capable of development within the plan period, having regard to the condition and availability of the land, infrastructure capacity, market considerations and environmental capacity;**
- **Highly accessible, especially by adequate public transport services, walking and cycling;**

- **Well-related to areas with high levels of worklessness;
and/or areas in need of regeneration;**
- **Well related to neighbouring uses, particularly in terms of access, traffic generation, noise and pollution.**

Sites for regionally significant office development should be focussed in or adjacent to city and town centres.

Sites for regionally significant knowledge-based services may also be clustered close to universities, major hospitals or other research establishments.

Sites for regionally significant knowledge-based manufacturing should be well connected to these facilities by transport and ICT links.

Sites for regionally significant logistics and high-volume manufacturing should be well connected to the primary freight transport networks.”

Reserve Sites

- 5.46 Policy W2 and Table 8.1 of the draft RSS refer to broad locations for “reserve sites”. These would be held back to accommodate “investment that would otherwise be lost to the region.” However, the basis on which such a judgement would be made is not clear. The implication is that some forms of economic activity would be turned away. We were told that the mechanism for restricting the development of a “reserve site” until a suitable investment was identified might be by means of a Section 106 agreement.
- 5.47 The intention that the “reserve sites” should be fully serviced and actively marketed, implies that their prospective developers would incur costs. However, the return on this investment would be deferred indefinitely, pending the identification of a suitable use. In the interim, the fully serviced land (which would be suitable for development and might otherwise provide much needed jobs) would presumably stand idle.

- 5.48 At present RPG13 makes no provision for “reserve sites”. At paragraph 4.22 it states that “... there is no need to identify additional sites for large single users. It should be possible to accommodate such future investment opportunities within the region’s existing employment portfolio ...” We agree with this, and are aware of no relevant change of circumstances that has arisen since RPG13 was adopted. There are already a number of large sites in the North West, committed for employment use, but awaiting development. We can see no reason to restrict the development of suitable sites in the interest of the hypothetical and ill-defined investment opportunities which “reserve sites” are intended to accommodate. Accordingly we conclude that no provision should be made for “reserve sites” in Policy W2.
- 5.49 Where reserve sites are allocated but not the subject of an outstanding planning permission, it will be for the local planning authority to review the allocation against the RSS criteria. If the site complies with the criteria, it could be allocated as a general employment site, subject to the quantitative employment land provisions in Table 8.2. Otherwise it should be de-allocated in the Local Development Framework, as indicated in our recommended amendment to paragraph 8.14 of the draft RSS.

Inter-Modal Freight Terminals

- 5.50 The draft RSS identifies four broad locations for the development of inter-modal freight terminals. We accept that development of this sort will be necessary in order to transfer the movement of freight from the highway network to rail or water. This would potentially yield substantial benefits in reducing carbon emissions, and easing road congestion. The freight terminals would have to be readily accessible from the strategic road network, and by rail and/or water. They would also have to be close to the major origins and destinations of freight movement in the North West (effectively in the three city regions).
- 5.51 There appears to be scope for the provision of inter-modal freight terminals on sites that are already allocated for development in south-west Greater Manchester (Barton), in Widnes (Ditton), and at Birkenhead (Twelve Quays). Those proposals were not the subject of controversy at the EiP.

- 5.52 The fourth location identified in the draft RSS is at Newton-le-Willows. In this connection, we understand that a planning application has now been submitted for the development of an inter-modal distribution and storage facility on land within the Green Belt at Parkside Colliery. Although we heard representations from both the prospective developers and the Parkside Action Group (who oppose this scheme) it would not be appropriate for us to comment on the detail of the present proposal. However, we note the Action Group's evidence about the capacity of the rail network, the potential cumulative environmental impact of major development proposals in the vicinity of Newton-le-Willows, and the vulnerability of the Green Belt in this area.
- 5.53 On the other hand, NWDA drew our attention to the fact that deep-sea container traffic into the UK is growing at about 5% a year, whilst the existing rail freight terminals in the North West are nearing their capacity.
- 5.54 CPRE argued that only the most sustainable sites for inter-modal freight terminals should be permitted to come forward; and that these should be assessed against the criteria set out in Appendix RT5.1 of the draft RSS. They considered that Basford (Crewe) and Seaforth (Liverpool) would be superior to Newton-le-Willows as potential locations.
- 5.55 However, on balance, we are persuaded that the Newton-le-Willows area would have considerable advantages as a location for an inter-modal freight interchange. It lies at the intersection of the region's primary road and rail corridors (the M6 and the West Coast Main Line, which run north-south, providing links with Scotland, the Midlands, London and the South of England; and the M62 and Trans-Pennine rail route, which run east-west, linking Liverpool and Manchester with Yorkshire, Humberside and the North East of England). A freight interchange at Newton-le-Willows would lie between the major centres of production and consumption on Merseyside and in Greater Manchester. We have no doubt that it could secure a substantial reduction in the mileage covered by heavy goods vehicles moving freight to or from these centres by road.
- 5.56 It is not for us to come to a decision about the allocation of land for an inter-modal freight terminal at Newton-le-Willows, or about the present planning application in respect of Parkside Colliery. Those are essentially matters for the

local planning authority, who will take account of detailed operational considerations and environmental impacts. However, we consider that if a site is to be identified for such a purpose in a local development document, this would almost certainly necessitate a local review of the Green Belt boundary. We consider that such a review would be justified in order to accommodate the development of an inter-modal freight terminal, but not for other forms of development, including large scale storage and distribution uses that are not directly required to facilitate the interchange of freight between road and rail.

- 5.57 We see no reason why the criteria in Appendix RT5.1 should not apply generally to proposals for the development of inter-modal freight terminals. In the absence of support for this form of development at Crewe or Seaforth from either the Assembly, the relevant planning authorities or commercial interests, we do not think that these locations should be identified in the RSS.

RECOMMENDATION

R5.11³

Inter-Modal Freight Terminals

A new policy should be introduced after Policy W2, to read as follows:

“Policy W2A – Inter-Modal Freight Terminals

Plans and strategies should consider the allocation of land for inter-modal freight terminals (where goods could be transferred from road to rail and/or water transport) in the following broad locations, as shown on the Key Diagram:

- **South West Greater Manchester (with access to rail and the Manchester Ship Canal);**
- **Widnes (with access to the West Coast Main Line (Liverpool Branch));**
- **Newton-le-Willows (with access to the West Coast Main Line and Trans-Pennine rail route);**

³ See Appendix F, Addendum Report to clarify this recommendation

- **Birkenhead Waterfront and Eastham Docks (Wirral Waterfront SIA).**

Proposals for inter-modal freight terminals should satisfy the criteria set out in Appendix RT5.1. Sites should be allocated and planning permission granted only where the local planning authority is satisfied that interchange between transport modes is the primary purpose of the development. A review of the Green Belt boundary in the local development framework would be justified in order to accommodate an inter-modal freight terminal in accordance with this policy. If land is removed from a Green Belt in accordance with this policy, the relevant development plan document should include a presumption against its development for purposes other than an inter-modal freight terminal.”

Consequential Modifications

- 5.58 The deletion of Table 8.1 will necessitate consequential amendments to paragraphs 8.6 and 8.7 of the draft RSS and the Key Diagram. It is essential that there should be alignment between the RSS and the RES. However, the identification of strategic regional sites in the latter document should not pre-empt decisions about the spatial distribution of development. Many of these strategic regional sites have already been allocated for employment development in the relevant statutory development plans. Some are also the subject of planning permissions, and some are under construction. Where planning permission has been granted, the land is effectively committed for development. Otherwise, it will be for local planning authorities to consider the regional strategic sites in the light of the criteria based policy set out above, and allocate land accordingly, subject to the limitations imposed by Policy W3 and Table 8.2. The redrafting of the text supporting Policy W2 should make this clear.

Retail Development

- 5.59 Policy W5 of the draft RSS proposes a 3-level hierarchy of centres in which comparison retail development is to be encouraged. Manchester and Liverpool City Centres constitute the top tier. The central shopping areas of these

cities are not co-extensive with the regional centres as described in the draft RSS. To avoid confusion, we consider that they should be referred to as the “North West’s primary retail centres”, rather than as “regional centres”, in Policy W5. A network of 24 listed centres forms the second tier. And unidentified subordinate centres constitute the third tier.

- 5.60 The Assembly suggested some minor changes to this policy. These are first, that the reference to Manchester City Centre should be amended to Manchester/Salford City Centre; second, that the reference to “investment” in unlisted centres should be amended to read “investment of an appropriate scale”; and third, that the reference to the sequential approach should be qualified by the words “established in PPS6”, so as to avoid confusion with the sequential approach proposed in Policy DP1. We support these proposed changes, which appear uncontroversial.
- 5.61 Cumbria CC considered that the hierarchy should be based on retail activity in general, rather than just on comparison goods shopping. However, it seems to us that convenience shopping is (and should be) a highly localised activity. Unlike comparison goods shopping, it is not concentrated in regionally significant centres. Nevertheless, we note that paragraph 8.20 of the draft RSS indicates that the pattern of convenience retailing may be considered in a future review.
- 5.62 GONW argued that the hierarchy of town and city centres should be based on a consideration of the way in which they function as a whole, rather than simply on their retail importance. We agree that town and city centres have multiple roles in addition to their retail function – for instance as transport nodes; as places of employment; and as focal points for cultural and leisure activities, and public administration. However, paragraph 8.25 indicates that a future review of the RSS will address regional issues for the wider range of town centre uses identified in PPS6. We are unable to take this further at present.
- 5.63 The proposed retail hierarchy differs from the settlement hierarchy in Table 7.1 of the draft RSS, and serves a separate purpose. GONW argued that it would send a signal to prospective developers and investors about the types of scheme that would be appropriate in a particular centre. Centres that are excluded from the list in Policy W5 might be overlooked. Similarly, funding decisions by public sector institutions might be influenced by the hierarchy, and could

help a particular centre maintain its position or advance. Tesco Stores Ltd were concerned that the hierarchy amounted to a “snapshot” of the existing position, whereas it should be more aspirational in promoting change.

- 5.64 However, Policy W5 encourages retail investment in centres at all levels of the hierarchy, so long as this is consistent with the scale and function of the centre, and does not undermine the vitality or viability of any other centre, or result in an unsustainable shopping pattern. We consider these criteria to be appropriate, and we are not convinced of the need for any change in the established regional hierarchy of comparison goods retailing.

Unlisted Centres

- 5.65 A number of participants objected to the exclusion of particular centres from the list that makes up the second tier of the hierarchy. MPU argued for the inclusion of Widnes town centre. At the time of White Young Green’s Town Centre Assessment Study, which informed the preparation of Policy W5, part of Widnes’s shopping area was in the course of redevelopment. Furthermore, a significant part of the town centre’s trade in comparison goods is carried out in superstores, which were not counted in White Young Green’s assessment. As a result, the figures given in the assessment for the centre’s existing comparison retail floor space were unrepresentatively low.
- 5.66 However, it is not uncommon for comparison goods to be sold in superstores, and we have seen nothing to suggest that White Young Green’s assessment was inconsistent in dealing with this practice. Widnes may have a slightly larger comparison retail floor area than some of the second tier centres listed in Policy W5, such as Northwich. But size is not the only criterion for the selection of the listed centres, and Widnes appears to play a significantly different retail role to Northwich. In particular, Widnes is relatively close to the regional centre of Liverpool, which offers higher order comparison shopping provision. On balance, we are not persuaded that the amendment of Policy W5 by the inclusion of Widnes in the list of centres would be justified.
- 5.67 Cheshire County Council sought the inclusion of Ellesmere Port in the list of second tier centres. However, in 2004, Ellesmere Port had a comparison retail floor area of less than

20,000 sq m⁴, and was appreciably smaller than any of the listed centres. We note that the Panel who conducted the Cheshire Structure Plan Examination in Public considered that Ellesmere Port should be recognised as a primary centre; and we accept that it would benefit from further investment. However, we consider that it is of limited regional significance as a shopping place.

- 5.68 Policy W5 refers to only 3 centres in Cumbria – Barrow, Carlisle and Kendal. These are the county’s largest comparison retail centres, but they serve an extensive area, and the distances between them are considerable. Cumbria CC argued for the addition of Penrith, Workington and Whitehaven to the list of second tier centres.
- 5.69 When the assessment work on which the draft RSS is based was undertaken, Penrith had a comparison retail floor area of less than 20,000 sq m. Although the evidence is that it now exceeds this figure as a result of recent development, it remains relatively small in relation to most of the centres specified in Policy W5. We are not convinced that its elevation to the list of second tier centres is justified.
- 5.70 Workington and Whitehaven are also relatively small centres, although together they play a regionally significant role in providing for the comparison shopping needs of West Cumbria. We note that the Assembly would have no objection to their inclusion in the list of centres in Policy W5. We consider that their inclusion would send a signal that would help in the regeneration of West Cumbria, and we recommend accordingly.
- 5.71 We were asked to consider whether other centres should be included in the second tier of the proposed shopping hierarchy. The list of potential candidates includes Runcorn (Halton Lea), Wilmslow, Nantwich, Knutsford, Hale, Didsbury, Stretford, Sale, Walkden, Kirby, Skelmersdale, Ormskirk, Clitheroe, St Anne’s, Fleetwood, Morecambe and several others. Again, we note that these are relatively small centres in terms of comparison retail floorspace. If any of them were to be included in the second tier of the hierarchy, there would be numerous centres of similar size that might be equally qualified. The hierarchy would become both cumbersome and relatively meaningless. In the

⁴ Retail floor areas in this section of the report are derived from the North West Regional Assembly’s Briefing Paper 16.

circumstances, we are not persuaded that any further additions should be made.

Chester, Preston and Carlisle

- 5.72 The City Councils of Carlisle, Chester and Preston presented a joint case in support of their proposal that these three city centres should be promoted to a separate tier in the retail hierarchy, at an intermediate level between the regional centres (of Manchester and Liverpool) and the other listed centres. The three councils considered that, in its present form, Policy W5 was contrary to the advice in PPS6, which sought to avoid the dominance of the largest centres. They argued that, at present, comparison goods expenditure from an extensive part of the North West was being drawn to the regional centres of Manchester and Liverpool. This entailed significant and unnecessary travel, which was unsustainable.
- 5.73 The three Councils argued that in promoting an undifferentiated network of 24 second tier centres, Policy W5 failed to identify comparison shopping facilities of particular sub-regional significance. The policy established no priorities for growth or regeneration. And it failed to show how retail development should respond to changes in the distribution of population and planned strategic growth. Carlisle, Preston and Chester were already sub-regional shopping centres by virtue of their retail floor areas and catchments. This was recognised in the relevant Structure Plans, in which Carlisle and Chester were identified as being of sub-regional importance, and Preston was included in the top tier of centres in Lancashire. It was inappropriate that these city centres should now be subject to the policies that applied to relatively minor shopping places.
- 5.74 Grosvenor Ltd agreed, arguing that Policy W5 would restrict retail growth in Chester, Preston and Carlisle, whilst focussing further development in central Manchester and Liverpool. Investors needed a high level of confidence before committing themselves to retail development schemes. The promotion of the three city centres in the retail hierarchy would help provide this. NWDA considered that Preston should be identified as the sub-regional centre for the Central Lancashire City Region, in which it was a key driver of growth.
- 5.75 On the other hand, Blackpool Council, Blackburn with Darwen BC and Lancashire CC, all opposed the elevation of

Preston to a new tier in the retail hierarchy. They argued that Manchester and Liverpool were not unduly dominant, and that relatively little retail expenditure leaked from Lancashire to those centres. However, there was already significant leakage from Blackpool's natural catchment area to Preston. This would probably be exacerbated if Preston were elevated in the retail hierarchy.

- 5.76 Our starting point in considering this matter is that Manchester and Liverpool are in a different class to other retail centres in the North West. The undifferentiated network of second tier centres should permit a reasonably even spread of retail facilities outside the two regional centres, with no individual centre becoming unduly dominant. Policy W5 clearly aims to avoid disproportionate retail growth in any one centre, which might harm its neighbours and give rise to increased numbers of long distance shopping trips. We consider this approach to be consistent with the overarching spatial principles which should underpin the RSS.
- 5.77 However, Policy W5 does not preclude proportionate retail development in any centre. Carlisle is some distance from its nearest competitors and will plainly continue to serve as the major focus for retail development in Cumbria, in line with the present policy in the Cumbria Structure Plan. Chester is a well established shopping centre. Although it serves a sub-regional function, as recognised in the Cheshire Structure Plan, its continued growth should not be at the expense of neighbouring centres. Preston is one of four centres in the Central Lancashire City Region that are listed in Policy W5. The polycentric character of this city region was drawn to our attention on a number of occasions. This character would be disturbed if Preston were significantly to increase its retail role in comparison to that of Blackpool or Blackburn. This is not to say that there should be no further retail development in Preston, but that the principles set out in Policy W5 should be observed. On balance, we are not persuaded of the need for an additional tier in the retail hierarchy shown in Policy W5.

RECOMMENDATION

R5.12

Policy W5

Policy W5 should be modified by:

- **the substitution of "Manchester/Salford" for "Manchester" in the second paragraph;**
- **the substitution of the words "primary retail centres" for "regional centres" in the second paragraph;**
- **the addition of Workington/Whitehaven to the listed centres;**
- **the insertion of the words "of an appropriate scale" after the word "investment" in the fourth paragraph;**
- **the insertion of the words "established in PPS6" at the end of the penultimate sentence of the final paragraph.**

Retail Floorspace

- 5.78 Table 8.4 of the draft RSS sets out indicative town centre comparison floorspace requirements to 2021. A number of participants considered that these figures should be treated with great caution, or removed from the RSS altogether. North West Environment Link questioned whether the scale of retail growth indicated would be needed.
- 5.79 The Assembly suggested some detailed amendments to reinforce the message that Table 8.4 was no more than an assessment of potential need. However, they agreed that it could be relocated in the Technical Appendix to the RSS.
- 5.80 Paragraph 8.22 of the draft RSS says that Table 8.4 is intended to provide a benchmark for the retail need assessments that local planning authorities will have to prepare in accordance with PPS6. However, it does not provide figures for individual planning authorities; and the sub-regions on which it is based do not correspond with those used for other planning purposes. We are not

convinced that it will be particularly helpful to the local planning authorities.

- 5.81 Table 8.4 is based on work undertaken by White Young Green in 2005. It is plainly difficult to forecast regional retail floorspace requirements for a 16-year period. We note that regional expenditure on comparison goods is expected to increase by 83% over the study period, and that some of this growth is likely to be absorbed by increased efficiency in the use of floorspace, and by special forms of trading such as mail order and internet sales. Against this, Table 8.4 indicates a potential requirement for 2.2 million sq m of additional comparison retail floorspace, an increase of about 140% over the floor area of the centres specified in Policy W5. We consider that this may be unduly high. Since the Table does not inform RSS policy, we consider that it should be deleted.

RECOMMENDATION

R5.13

Table 8.4

Table 8.4 should be deleted from the RSS.

The words "as shown in Table 8.4" should be deleted from paragraph 8.20.

Paragraph 8.22 of the RSS should be replaced with the following:

"Local planning authorities will have to prepare retail need assessments for their local development frameworks, in line with the advice in PPS6. Specific retail development schemes will also require the preparation of detailed need assessments."

Regional Casinos

- 5.82 Policy W8 of draft RSS, and supporting paragraphs 8.33-8.38, deal with the question of Regional Casinos. The Policy indicates that Blackpool is to be the priority location for regional casino development and that other proposals or schemes should not be promoted in the region pending the

implementation of a regional casino there. The regional centres of Manchester and Liverpool were identified as the broad locations for subsequent developments. The detail is to be found on pages 27/28 of draft RSS.

Criteria Based Policy

- 5.83 At the EiP Manchester City Council put forward an alternative approach – a criteria based policy (EiP/MCC/1), with supporting text. We, and other parties, expressed dismay that this was produced so late in the day but – having given other parties an opportunity to respond – we agreed to consider it and we have done so.
- 5.84 The proposal did not find much favour at the EiP. It was supported, with one reservation, by AGMA but not by any other party. It was opposed, strongly, by the Assembly and by GONW, NWDA, Blackpool and ReBlackpool.
- 5.85 Manchester CC argued that their proposal would not close options and would enable both current and future proposals to be measured against a set of reasoned and reasonable criteria.
- 5.86 Others, reacting immediately to the late submission, argued that this would be a backward step. The process of measuring proposals against criteria had already been carried out. The criteria proposed by Manchester CC had all been taken into account.
- 5.87 Moreover, these criteria were not specific – they could lead to a choice of sites in very many parts of the Region. There was nothing in them which was disagreeable but it was doubtful whether they, as GONW put it “... lead down sufficiently specific decision paths.”
- 5.88 The Assembly went further and suggested that Manchester CC’s policy was not “fit for purpose”. The criteria were hard to assess, very many sites would match the criteria, and it provided too much scope for argument and debate. It was “less spatial” than Policy W8 and did not provide a sound basis for LDFs.
- 5.89 NWDA felt that RSS should set priorities, and identify broad locations. The criteria based policy would sever the alignment with the RES. ReBlackpool argued that, whilst criteria based policies were useful when there was not a clear

intention, here there was a clear way forward and a criteria-based policy would be a step back from that.

5.90 We agree with these criticisms and reject the proposal for a criteria-based policy. The criteria themselves, though (had they been submitted earlier) they might have benefited from debate and refinement, are not unreasonable. But we agree that they are open to wide interpretation. A lengthy process has been followed which has led to a specific proposal (which we consider below). The time for reverting to a list of criteria against which to consider proposals is, in this instance, past in our view. We therefore move on to consider the arguments which were raised in relation to Policy W8, and the supporting text. These, essentially are:

- whether a preference should be expressed;
- whether it should be Blackpool;
- whether the way in which it is expressed in the draft RSS unreasonably prejudices or precludes development at other locations.

A Preference at All?

5.91 It seems to us, on the basis of evidence from GONW and others, not only that there is no reason why RSS should not express a preference, but that there are reasons why it should. A regional casino would be an important element in the development of the regional economy. It would provide employment, easing problems of worklessness, and it would give impetus to the regeneration of a run down area. We consider it appropriate that RSS should indicate the location at which it would provide the greatest benefit. We think that, so long as they can be justified, plans should make clear and positive proposals (a point which applies not just in relation to casinos but in general). We are aware that in the North West there has been very lengthy debate and discussion on the issue, over several years, and we think therefore that it is right to identify a priority location.

Should it be Blackpool?

5.92 We used the phrase "so long as they can be justified" in the previous paragraph. There was of course a considerable division of opinion on this point at the EiP. Manchester CC, New East Manchester and AGMA all argued strongly against the Blackpool priority and preferred the Manchester site.

Blackpool Council, ReBlackpool, and the Lancashire Economic Partnership argued equally strongly in favour of Blackpool. Other participants – NWDA, Culture Northwest and GONW – as well as the Assembly themselves supported Blackpool.

- 5.93 The decision to favour Blackpool was based, in part, on a report by Pion Economics. This report was questioned, especially by Manchester CC and New East Manchester in their statements. They argued for example that it was not transparent and the evidence did not justify its conclusions. The statements set this out in more detail.
- 5.94 The Pion work set out to consider a range of scenarios, rather than a single site, and it suggested that the North West could accommodate a number of large and regional casinos. It was in section 6.4.5 (on page 46) that it came down in favour of Blackpool and it was this section that had caused particular concern in the Manchester area.
- 5.95 This conclusion – essentially that either location would be suitable, but that Manchester had a variety of other drivers for economic revival, whilst Blackpool had none – was supported by the Assembly and others and influenced Policy W8. The Panel has sympathy with this view. We do not underestimate the extent of deprivation in Manchester, and the continuing need for regeneration. Very serious problems remain. But we heard throughout the EiP of the potential for growth in Manchester, and the numerous ways in which its economy has been, or is being, transformed. We note that the casino proposal was not mentioned in evidence on Matter 7 (the Manchester City Region); it did not feature in the Manchester City Region Spatial Strategy (SDL/AGMA/17), which set out on page 8 a list of economic priorities (“growth accelerators”) which did not include casinos. Nor did it appear in the City Council’s evidence on that Matter, which dealt extensively with the “key assets driving growth within the City Region” and in paragraph 13 forecast the creation of over 100,000 jobs in the next ten years, apparently without the benefit of the casino. There are few such signs of revival in Blackpool, and footloose tourism development (of which the casino is an example) does seem to us to offer the best and most appropriate opportunities for it.
- 5.96 It was stated at the EiP that, notwithstanding any deficiencies in the Pion report (and not all parties accepted these deficiencies) there were other reasons for the choice of Blackpool. We were referred back, for example, to a report

by Locum Destination Consulting on “A New Vision for North West Coastal Resorts” (ENV8) and to Blackpool’s bid for an Urban Regeneration Company about five years ago. It was also pointed out to us that Blackpool was supported in the RES (Action 48), and in the North West Tourism Strategy and the Regional Cultural Strategy. When the NWDA Board had considered it there had been overwhelming support for Blackpool.

- 5.97 In view of all these factors we are persuaded that the draft RSS is right to give priority to Blackpool.

Prejudicial?

- 5.98 However, as indicated earlier, this is not the end of the matter. There were a number of representations opposing the way in which the policy was expressed, and the way in which paragraph 8.33 in particular sought to preclude other regional casinos until that at Blackpool is “... completed and operating at a viable level.”
- 5.99 There were various objections to this. It was pointed out that the end-date of the RSS was 2021, that further casino developments were likely during that period, and that RSS should take a long term view. It was felt that Policy W8 and paragraphs 8.33/34 as worded would stifle competition and place undue restrictions on possible further developments. Parties questioned who was to decide whether a Blackpool casino was viable and how that decision could be made. And there was general agreement that, should the Government select Manchester as its preferred site, RSS should not be capable of being used to frustrate such a development.
- 5.100 We agree with these criticisms and, whilst we think the Blackpool priority should be retained, we think that changes should be made, as GONW put it, to: “remove the insistence on development in Blackpool as a pre-condition to the promotion of proposals in other parts of the Region.” GONW, on page 2 of their statement, put forward suggested changes and we agree with them.

RECOMMENDATION

R5.14

We recommend:

- **That Blackpool continues to be identified as the priority location for regional casino development.**
- **That the following changes are made to Policy W8 and paragraphs 8.33/34.**

Policy W8 – Regional Casinos

First sentence: delete “and should not promote other regional casino proposals or schemes in other parts of the North West, pending the implementation of a regional casino in Blackpool.”

Second sentence: delete “subsequent”, add “alternative”, to read:

“To maximise regeneration and other relevant benefits, the regional centres of Manchester and Liverpool are identified as alternative broad locations for regional casino development.”

Paragraph 8.33: be deleted.

Paragraph 8.34: add new final sentence “Blackpool is therefore identified as the priority location for regional casino development.”

Other Points

- 5.101 In their evidence MPU argued that the area of search for a casino site should be widened from Liverpool to the wider City Region. However, this was not pursued in subsequent stages, and we do not accept the point. As with other forms of development attracting significant numbers of people, regional and town centres seem to us, in the absence of evidence to the contrary, to be the correct location.

- 5.102 Blackpool Council in their statement (paragraphs 3.9/3.10) put forward some proposals to strengthen the need for impact assessments of casino proposals and schemes. There was no opposition to this suggestion, but it was supported by GONW and we agree that it would be helpful to make this addition.

RECOMMENDATION

R5.15

We recommend that paragraphs 8.37 and 8.38 of draft RSS are replaced by the following:

“It is important that casino proposals and schemes are subject to the full range of impact assessments. These assessments should include economic, social, transport and environmental assessments, taking into account any cumulative impact of casino development. Where there is evidence that casino development may have an adverse impact, mitigation measures which can satisfactorily resolve the impact need to be included in any proposed development.”

The Casino Advisory Panel

- 5.103 At the time of the relevant session of the EiP the Casino Advisory Panel (CAP) had not produced its report. We have proceeded purely on the basis of the evidence before us, and in fact we drafted the preceding paragraphs and recommendations before the CAP’s report became available. The CAP of course has recommended Manchester as the preferred site for a Regional Casino.
- 5.104 Our position is that on the basis of the evidence which was brought before us we do not believe we saw reason to recommend overturning the preference for Blackpool in draft RSS (though we recommend changing the policy and text as shown above). This must remain our position despite the CAP conclusion. We did not have the same remit as the CAP, nor was the evidence which we considered necessarily the same as the evidence that was before them. Their “primary consideration” – that locations “provided the best possible test of social impact” - was not a matter which we considered or upon which evidence was presented to us. We

are not bound by their conclusions and our professional judgement has to remain that Blackpool should be the preferred location for regional casino development in the North West. We are content to allow GONW to resolve this question, but we would repeat a point we made earlier; there was a consensus at the EiP that should Manchester eventually be selected via the CAP route, nothing in RSS should be allowed to frustrate its development. Assuming the CAP recommendation is accepted by Government, it seems clear that the best interests of the Region as a whole are served by allowing it to proceed.

CHAPTER 6 LIVING IN THE NORTH WEST

Objectives

- 6.1 Chapter 9 of the draft RSS sets out policies for housing, and for the provision of supporting services such as health care and education. We consider that it should begin with a clear statement of thematic objectives, which should reflect the overarching spatial principles of the RSS. However, as presently drafted, paragraph 9.1 ranges over issues that are dealt with elsewhere in the draft RSS, including the restructuring of the regional economy, the delivery of public transport, the promotion of viable town centres, and the improvement of the natural environment. We consider a more sharply focussed approach to be necessary.
- 6.2 Specific objectives were suggested to us by GONW. These were not seriously disputed during the EiP, and we think that they are broadly appropriate. However, we consider that the proposed reference to economic progress would duplicate material in that part of the draft RSS which deals with employment. We also consider that the thematic objectives introducing Chapter 9 should make reference to matters (such as the provision of health care, education and security) that underpin residential communities and are not dealt with elsewhere in the draft RSS.

RECOMMENDATION

R6.1

Social Objectives

The following text should be substituted for paragraphs 9.1 and 9.2 of the draft RSS:

“The RSS seeks to promote cohesive, mixed and thriving communities, where people will want to live, now and in the future. It aims to deliver the objective of ensuring that everyone can have a decent home, which they can afford, in a secure environment, with reasonable access to health care, educational provision and recreational facilities.

It specifically seeks to:

- **Build further on current knowledge of housing markets in the region, so as to deliver a better balance between housing demand and supply;**
- **Provide for additional housing, so as to meet changing needs, support economic development, address the requirement for affordable accommodation, and ensure a choice in dwelling types;**
- **Improve the quality of the housing stock and its environment.**

Sustainable Communities

- 6.3 Policy L1 of the draft RSS deals with the provision of health and education services. The Assembly suggested that it should be amended to embrace sport, recreational and cultural provision. They further suggested that specific reference should be made to the provision of childcare. We agree. In our view adequate provision in these fields is essential to the development and maintenance of sustainable communities. We also agree with the Assembly's suggestion that reference should be made to the particular requirements of disabled people; and to the need to ensure that communities enjoy good access by modes of transport other than the car.
- 6.4 A number of participants considered that Policy L1 should be deleted. We do not share that view. It is important that the RSS should provide a policy framework for the various agencies that make provision for social needs. In addition to health care and education providers, these include the recreational and social services departments of local authorities, the police, and various other public, private and voluntary bodies. The police submitted a substantial amount of evidence relating to their particular areas of interest and we suggested that NWRA should meet them to consider how these matters might best be taken forward.
- 6.5 We accept that the provision of specific facilities to serve residential neighbourhoods is not the whole story. The Directors of Public Health for Greater Manchester told us that public health is likely to benefit from an attractive living environment, designed in such a way as to provide access to green space; encourage residents to make short journeys on

foot or by bicycle; control through-traffic; and engender a high degree of community spirit and social support. They referred particularly to the special housing requirements of an ageing population (including the need for better wheelchair access within residential accommodation) a view that was also canvassed by Shelter.

- 6.6 Other participants drew our attention to the importance of green infrastructure, air quality, community space, local shops and adequate policing; to the needs of young people, particularly in black and minority ethnic communities; and to the imperative of transforming unpopular residential areas, so that people would choose to live in them. We accept the validity of these points; and we share the view of the Assembly that worklessness and low incomes can have a considerable influence on the health and well-being of communities. We also consider that homelessness, and poor and overcrowded housing, are likely to have serious adverse effects on both public health and educational attainment. The draft RSS rightly seeks to address many of these problems.
- 6.7 However, we consider it important that the RSS should take a strategic view and should not be unduly prescriptive. It should not become immersed in details of neighbourhood design and layout, which are more appropriate to local development frameworks. Nor should it establish standards for the internal arrangements of dwellings, where these are more properly the province of the Building Regulations.

RECOMMENDATION

R6.2

Policy L1

Policy L1 should be amended as shown in the North West Regional Assembly's Briefing Paper 20.

Housing Market Areas (HMA)

- 6.8 Policy L2 of the draft RSS indicates that local authorities should develop an understanding of local and sub-regional housing markets, by undertaking housing market assessments. PPS3 indicates that Regional Spatial Strategies should define sub-regional HMAs; identify which local planning authorities these

areas include; and specify the proposed housing provision for each of them. However, this guidance was issued too late to be reflected in the draft RSS.

6.9 GONW commissioned Ecotec Research and Consulting to undertake a study of HMAs in the North West, with a view to informing the RSS. We have been provided with a copy of Ecotec's report (SDL/GONW/3). GONW asked whether it would be possible to recast the draft RSS housing requirements in a way that would better correspond to the HMAs identified in that report. To this end, they suggested a re-grouping of local authorities in Table 9.1 of the draft RSS. However, representatives of major house-builders considered that the Ecotec report should not be regarded as definitive, as it was somewhat simplistic and was based on evidence that is now becoming out of date.

6.10 GONW's suggestion causes us some concern. HMAs are unlikely to have precise boundaries, and are likely to overlap one another. The Ecotec research, which was based on travel to work patterns, suggests that different levels of the market operate in different geographical areas. It says:

... around Liverpool and Manchester, it may be appropriate to consider a hierarchical categorisation of housing market areas, with top tier housing market areas attracting long distance commuting by those in more specialist or better paid occupations, overlaying a lower tier of less extensive housing market areas.

6.11 Neither the higher tier nor the lower tier areas are necessarily co-extensive with local authority areas. Some local authority areas are split between HMAs, while some market areas consist of parts of a number of different local authority areas. For instance, the Ecotec report shows the Ribble Valley district to be split between 4 HMAs (Preston, Clitheroe, Blackburn and Burnley). By comparison, the GONW suggestion is that the whole of Ribble Valley district should be included in a Central Lancashire HMA, together with the whole of the administrative areas of Hyndburn and Blackburn with Darwen. Similarly, the Ecotec report identifies the Kendal HMA as extending across a substantial part of South Lakeland district and including part of Eden district, but wholly excluding Furness. On the other hand, the GONW suggestion identifies a South Cumbria HMA, which consists of the whole of the Barrow in Furness and South Lakeland districts. There are a number of similar disparities between the HMAs as identified by Ecotec and GONW.

- 6.12 The housing data available to us cannot readily be disaggregated to areas that approximate to the housing market area boundaries shown in the Ecotec report. We consider that the HMAs themselves may well be controversial. At a Housing Seminar held prior to the EiP, we learned that local authorities in Cumbria have also produced a map of HMAs in their county, which bears little resemblance to the corresponding map produced by Ecotec or to the GONW's suggested HMAs. This suggests that the definition of HMAs is likely to require an exercise of judgement, rather than the simple analysis of factual material. We are aware that AGMA and MPU are also undertaking research on this matter, and we have no reason to believe that they will necessarily endorse the housing market boundaries identified by Ecotec or GONW.
- 6.13 The definition of HMA boundaries could well be a sensitive issue. We consider that it would be inappropriate to introduce such areas into the RSS without a thorough assessment, on which the public would have an opportunity to comment.
- 6.14 The proposal that sub-regional housing market assessments will be undertaken by groups of local authorities, working in partnership with the Assembly, the house-building industry and other interested parties, provides a potential solution. It would help define agreed HMAs, which could then form the basis of a review of the RSS's housing provisions, as we have indicated in Chapter 2.

The Existing Housing Stock

- 6.15 Policy L3 of the draft RSS deals with the existing housing stock. The Northern Way Sustainable Communities Team stressed the importance of the quality of the housing stock in achieving economic expansion. They considered that the existing "offer" constrained economic growth. There was a particular need for good quality accommodation, at the right price, for family-builders, for graduates, and for workers in knowledge-based activities.
- 6.16 Representatives of the volume house-builders agreed that there were not enough good family-sized homes, and too many small terraced houses, in parts of the North West. This imbalance could be solved only by new house building. New housing provision in suburban areas would be unlikely to have a significant adverse effect on the Housing Market Renewal Pathfinders, whose work focussed on inner urban areas.

- 6.17 NWDA were also concerned about the quality of the existing housing stock. The Pathfinder initiatives were making an impact, but there was a need to identify further areas that were at risk of market failure, and to take action to forestall their decline.
- 6.18 Other participants argued that the rehabilitation of existing dwellings was more sustainable than their demolition and replacement, in terms of the consumption of materials and energy. Greater effort should be made to improve existing residential areas and make use of vacant dwellings. The Directors of Public Health for Greater Manchester stressed the health benefits of improving existing residential areas, particularly by improving poor housing, increasing access to green space, and controlling through traffic.
- 6.19 We do not disagree with any of these points. However, Policy L3 provides for the comprehensive regeneration of existing residential areas where this is necessary. It indicates that the approach to be adopted might include clearance, renewal or refurbishment, or a mix of these, depending upon local circumstances. We consider this to be a reasonable approach, and make no recommendation to amend the policy. The work of the Pathfinders in securing improvements in failing housing areas is encouraging. We accept that there may be other areas that would benefit from similar treatment.

The Proposed Region-wide Housing Provision

- 6.20 Policy L4 deals with future housing provision. The Assembly have suggested two minor changes to this policy. The first is the introduction of a reference to energy efficiency standards in new dwellings in the policy's second bullet point. We have some reservations about this on the grounds that, like the other matters covered in this bullet point, the need for energy efficiency in housing is not specific to the North West, and might more appropriately be dealt with nationally through the Building Regulations. However, we support the intention of the proposed change.
- 6.21 The second change suggested by the Assembly would clarify that the term "transport networks" (in the seventh bullet point) includes public transport, pedestrian and cycle networks. We do not dissent from this.
- 6.22 The third bullet point in Policy L4 of the draft RSS refers to the cumulative impact of residential development on the existing

housing stock in four specified areas. GONW have pointed to a potential inconsistency in the way that this matter is addressed in different parts of the draft RSS. In order to deal with this, we consider that the specified areas should be deleted from Policy L4.

- 6.23 In order to address points raised by the Environment Agency and United Utilities, we consider that Policy L4 should refer to the need to ensure that new dwellings will be served by adequate water supply and sewage management facilities.

RECOMMENDATION

R6.3

Policy L4

Policy L4 should be amended as shown on page 10 of the North West Regional Assembly's Briefing Paper 20, subject to the following:

The third bullet point should be abbreviated to read:

- **"Ensure that new housing development does not have an adverse cumulative impact on the existing housing stock and market;"**

An additional bullet point should be inserted as follows:

- **"Ensure that new dwellings will be served by adequate water supply and sewage management facilities."**

- 6.24 Policy L4 and Table 9.1 of the draft RSS make provision for a maximum increase of 411,160 dwellings across the region between 2003 and 2021, net of clearance replacement. This amounts to an average net increase of 22,844 dwellings a year. The corresponding figure in RPG13 is 12,790 dwellings a year. The draft RSS therefore proposes a considerable relaxation of the restraint policies that currently apply in the North West.
- 6.25 The proposed housing provision has been determined on the basis of a balance of information, including an assessment of housing need contained in the North West Household Growth Estimates Study. This study made use of three economic growth scenarios prepared for NWDA. The scenarios include

estimates of future employment changes, based respectively on long term economic trends, recent economic success, and a future transformation in economic activity. The household growth estimates assessed the number of additional households that would need to be present to support the levels of employment indicated by each scenario, on the basis of various assumed economic activity rates. In effect, at any given activity rate, an increase in the number of jobs available would be likely to affect migration into the area, thereby adding to the housing requirement.

- 6.26 AGMA argued that the future employment levels derived from each of the three growth scenarios appeared already to be based on assumptions about future economic activity rates. They considered that it was unsatisfactory to apply a different set of assumed economic activity rates to these future employment levels, in order to derive household projections. That may be so, although we are not convinced that it invalidates the estimates.
- 6.27 In determining the requisite scale of housing provision, the Assembly have assumed that the employment rate across the North West will approximate to the present UK average of 74.2%. On this basis, the "long term economic trend" scenario would imply a region-wide increase of about 17,700 households a year; the "recent success" scenario would imply an increase of about 25,000 households a year; and the "transformational scenario" would imply an increase of about 29,000 a year.
- 6.28 The Assembly considered that housing provision based on the "long term economic trend" scenario would result in negative (or very low levels) of population growth in Merseyside, which would be contrary to the emerging policy for the Liverpool City Region. It would also result in very low levels of housing provision in Cumbria, which would be contrary to the objective of increasing the supply of affordable accommodation there.
- 6.29 Conversely, provision in accordance with the "recent success" scenario would result in severe pressures for house building in parts of the Manchester City Region, and might have negative effects on the Pathfinder Areas, by increasing housing supply where markets are already weak. As a result, the figure for regional housing provision in the draft RSS was based on a compromise between the "long term" and "recent success" scenarios.

- 6.30 The CLG's 2003-based household projections were published after the draft RSS had been submitted to the Secretary of State. These indicate an increase of 416,000 households in the North West between 2003 and 2021, an average annual increase of about 23,100.

Response to the Amount of Housing Proposed Region-wide

- 6.31 There is an inconsistency between the economic policies in the draft RSS (which are based on the highest future levels of employment derived from the "recent success" and "transformational" scenarios) and the housing policies, which are more conservative. NWDA argued that the proposed housing provision would be too low to support the transformational change sought in the region's economy by the Government's PSA2 target, by the Northern Way Growth Strategy, and by the RES. They considered that the additional residential development should be within the range 25,000 to 29,000 dwellings a year, as implied by the "recent success" and "transformational" scenarios respectively. They pointed out that the CLG's 2003-based household projections took no account of the recent improvement in the economic performance of the region.
- 6.32 Some house-building firms shared this view, arguing for a minimum of 25,000 dwellings a year. The Northern Way Sustainable Communities Team and AGMA were also concerned that the proposed regional housing provision might be insufficient to support planned economic growth. AGMA were particularly concerned about the lack of a feedback loop between the economic and demographic components of the draft RSS, and considered that the Assembly had taken insufficient account of immigration.
- 6.33 On the other hand, GONW were broadly content with the amount of housing provision proposed for the region in the draft RSS. They considered that the annual increase in households forecast in the CLG's 2003-based projection was reasonably similar to the proposed average annual housing requirement in the draft RSS; and that the draft RSS housing policy would provide a sufficient basis for economic growth. They feared that a significantly greater level of housing provision might lead to further weakening of market demand in certain vulnerable areas, hampering regeneration initiatives. This point was endorsed by Elevate East Lancashire; and by Lancashire CC, who pointed out that the average annual housing requirement set out in the draft RSS was well in excess of the average

annual performance that had been achieved across the region since 1990.

- 6.34 The Home Builders' Federation (HBF) were also broadly content with the proposed regional housing total. They noted that it was not dissimilar to the CLG 2003-based household projection. It was substantially higher than the provision made in RPG13, which was less than 13,000 a year; and it was broadly in line with the current annual level of completions. The building industry would be able to deliver the requisite number of dwellings.
- 6.35 The Directors of Public Health for Greater Manchester questioned whether future housing requirements should be determined solely by economic growth. Greater weight should be given to considerations such as the age structure of the population, the increasing longevity of men, and the quality of residential environments.
- 6.36 Others queried whether the proposal to increase housing provision had taken sufficient account of environmental impacts, including water supply and sewage treatment capacity. It was argued that, on a precautionary basis, there should be no increase in the rate of house building until these environmental issues had been resolved.
- 6.37 North West Environment Link (NWEL) pointed out that the target in Appendix B of the draft RSS Implementation Framework was to achieve a regional employment rate of 80% by 2020. This was substantially higher than the assumed employment rate of 74.2% on which the regional housing requirement was based. Table 4.11 of the Technical Appendix demonstrated that if the 80% target were met, the annual household growth through inward migration would be unlikely to justify the level of housing provision proposed in the draft RSS. The total requirement would probably be for between 7,000 and 15,000 dwellings a year over the RSS period. The environmental effect of building more than 22,000 dwellings a year as proposed was not clear. Urgent consideration should be given to the region's environmental capacity. There was no evidence to demonstrate that a lack of housing provision was constraining the region's economy. The proposed regional housing provision should be reduced to no more than 15,000 a year.

Conclusions on the Amount of Housing Proposed Region-wide

- 6.38 We consider that it would be unwise to plan for the level of housing provision implied by the “transformational” economic growth scenario. A net increase of between 25,000 and 29,000 dwellings a year would result in an aggregate increase of between 450,000 and 522,000 dwellings in the North West during the period 2003 to 2021. The environmental capacity of the region to sustain this amount of development has not been tested. There is no evidence before us to show that water supply and sewage treatment capacity could be made available to support such a level of development; or that so great a number of dwellings could be accommodated without having an adverse effect on the integrity of nature conservation sites of international importance.
- 6.39 If the supply of jobs envisaged in the “transformational” scenario fails to materialise, the result might be an over-provision of residential accommodation and a renewed weakening of demand in vulnerable areas that are already characterised by failing housing markets and are in need of regeneration. The “transformational” scenario is not a forecast, but a description of one possible course of events. It is no more likely to ensue than either of the other scenarios considered by the Assembly. If, as a result of monitoring, it becomes clear that the economy is growing at the rate envisaged in the “transformational” scenario, it may be necessary to adjust the proposed housing provision in a future review of the RSS. But we do not consider that the evidence justifies such an adjustment at present.
- 6.40 In reaching this conclusion, we attach weight to the relationship between the proposed housing provision and the forecast of household growth in the CLG’s 2003-based projection. Given the uncertainty inherent in any long-term prediction of this sort, we consider that these figures match very well. We recognise that the CLG forecast takes no account of economic growth. But the clear implication is that there will be sufficient households (and population) to sustain a level of economic growth that exceeds the long term trend. If the activity rate in the North West were to increase above the present UK average, towards the 80% target indicated in the draft RSS Implementation Framework, the resident population would be sufficient to sustain a level of economic growth exceeding that implied in the “recent success” scenario, without increasing the housing requirement above that proposed in Policy L4.

- 6.41 We do not consider that the proposed housing provision should be reduced for precautionary reasons, as suggested to us by NWEL. We have seen no clear evidence that there would be insurmountable difficulties in providing adequate water supplies and sewage treatment capacity to serve the amount of housing proposed in the draft RSS, or that this level of development would cause unacceptable environmental damage. We deal with this matter further in our consideration of Policy EM5 in Chapter 8 below. A reduction in the proposed level of house-building would imply that the provision of new housing would fail to keep pace with the increase in the number of households projected in the CLG 2003-based forecast. It seems to us that this could lead to an imbalance between demand and supply, which might result in increased overcrowding and homelessness, and would hamper the provision of affordable accommodation.
- 6.42 We are not persuaded that these problems could be solved by bringing unoccupied dwellings into use, as argued by NWEL. Policy L4 of the draft RSS already proposes that vacancy rates should be reduced to 3% of the existing housing stock. This will contribute to meeting housing need. However, we note that an element of vacant housing is necessary to facilitate the exchange of properties in the housing market, whilst a number of existing vacant dwellings await redevelopment or refurbishment, and cannot immediately be made available for reoccupation.

Period Covered by Housing Policy

- 6.43 GONW asked us to consider the possibility of the RSS specifying the amount of new housing to be provided up to 2026, in line with PPS3. We recognise that by the time the RSS is adopted, it will provide housing figures for less than 15 years into the future, and that this will provide an unsatisfactory basis for the production of local development frameworks. However, we have insufficient evidence on which to roll the strategic housing provision policy forward to 2026. In our view the appropriate solution would lie in the early review of the RSS. In the interim, and in the absence of other evidence, it seems to us that local planning authorities should assume that the average annual requirement set out in Table 9.1 of the RSS will continue for a limited period beyond 2021, for the purpose of preparing their local development frameworks. These could subsequently be reviewed to reflect any change in the required provision arising from an early review of the RSS.

RECOMMENDATION

R6.4

Policy L4 - Housing Provision After 2021

The following should be added to Policy L4:

“For the purpose of producing local development frameworks, local planning authorities should assume that the average annual requirement set out in Table 9.1 will continue for a limited period beyond 2021.”

- 6.44 A number of participants drew our attention to the fact that the housing requirements in the draft RSS are for the period 2003 to 2021. By the time the RSS becomes effective, some 4 years of this period would be gone. There is likely to be an immediate shortfall in the average annual provision of new housing as measured against the new requirements; and an even higher annual average rate of provision will be needed to make up the deficit. There was widespread support for the proposition that the housing requirements should run from 2007. CPRE noted that no start date was specified in Policy UR7 of RPG13. They proposed the deletion of the 2003 start date from the draft RSS.
- 6.45 We do not accept that this would be appropriate. The average annual provision is governed by the requirement to achieve a net increase of slightly more than 411,000 dwellings in the region as a whole over the period between 2003 and 2021. That figure reflects the requirements of a growing economy, and is broadly in line with the increase in resident households shown in the CLG’s most recent projection. We have previously explained why we consider that it would be inappropriate to plan for a lesser provision. If the provision of new housing has fallen below the required level during the early years of the RSS period, a commensurate increase in average annual output will be required in the remainder of that period.

Maximum Provision

- 6.46 Policy L4 of the draft RSS indicates that the housing provision set out in Table 9.1 is to be the maximum to be achieved by 2021 in each local authority area, net of clearance replacement. HBF, GONW and others queried the definition of the term “net of clearance replacement.” We understand this to mean that the figures in Table 9.1 represent the required increase in housing

stock, over and above the replacement of any dwellings demolished. For the avoidance of doubt, we consider that a definition should be included in the RSS.

RECOMMENDATION

R6.5

Table 9.1 – Footnote

A footnote should be added to Table 9.1 as follows:

“The term ‘net of clearance replacement’ signifies that the figures represent the required increase in the number of dwellings, over and above the replacement of any dwellings demolished (in other words the net dwelling gain).”

- 6.47 Representatives of volume house-builders considered the use of maximum figures for housing provision to be inappropriate. They feared that it might result in a significant under-supply, as it implied that the maximum need not be provided in every area. They questioned whether any harm would be done if the maxima were to be exceeded.
- 6.48 Representatives of a number of local authorities were also opposed to the imposition of a rigid limit to future housing provision, some proposing that reference to a “maximum” should be replaced by reference to a “requirement” or a “provision”. Blackpool Council and AGMA thought that the maxima should apply to groupings of adjacent authorities, but that there should be freedom for individual authorities within these groups to exceed the provision for their areas.
- 6.49 On the other hand, the NWEL favoured the retention of maximum levels of housing provision, to avoid the breach of environmental limits that might result from the proposed levels being exceeded.
- 6.50 Paragraph 9.20 of the draft RSS makes it clear that the housing provision figures specified in Table 9.1 are to be regarded as the maxima for the whole of the period between 2003 and 2021. The annualised figures are averages, which may be exceeded or undershot in any particular year, provided that the maximum for the RSS period is not exceeded. In view of this, the

maximum figures cited will not impose a rigid constraint on provision in the immediate future. We would expect the RSS to be reviewed long before 2021. If there is a danger that the retention of the maximum figures would unnecessarily constrain the provision of housing to meet identified requirements, that matter can be considered at the review.

- 6.51 Since Policy L4 requires local authorities to achieve the total provision set out in Table 9.1, it would not permit a particular local authority to undershoot that requirement deliberately. In the circumstances, we see no reason to recommend any amendment to the word “maximum” in Table 9.1.
- 6.52 The proposition that the maxima should apply to groups of authorities, who would then be free to negotiate the distribution of provision between themselves, is worthy of further consideration. Paragraph 9.22 of the draft RSS envisages such an arrangement. However, we consider that it would be practicable only where the authorities in question were committed to the production of a joint development plan document on housing provision.

Phasing

- 6.53 A number of participants argued that the RSS should include provision for the phasing of residential development. However, Policy L4 indicates that local planning authorities should introduce phasing policies for the release of housing land. We consider this to be appropriate. We are conscious that some authorities would have great difficulty in meeting the average annual provision indicated in Table 9.1 during the early part of the RSS period, but will be able to increase the rate of housing provision later. For instance, in Oldham, significant house-building during the early years of the RSS period would be likely to weaken the market for existing housing and adversely affect the progress of the Pathfinder initiative there. However, there is likely to be scope for increased provision towards the end of the RSS period.
- 6.54 On the other hand, in some local authority areas (such as Bury) there are immediate opportunities for residential development, such that a large part of the RSS requirement could be met relatively early. There may be no good reason to hold this development back to comply with an arbitrary phasing programme. A lower average annual output toward the end of the RSS period would ensure that the maximum figure would not be exceeded. South Lakeland DC indicated that they intend

to take up a large part of their housing allocation relatively early in the RSS plan period, in order to meet the immediate need for affordable accommodation. Although PPS3 indicates that RSS should include a housing trajectory, we do not have sufficient evidence to support a regional phasing programme. In our view, phasing should remain a matter for determination by local planning authorities in the light of local circumstances.

Residential Density

- 6.55 No density targets are specified in the draft RSS, although PPS3 now indicates that these should be included. The Assembly concluded that they had no particular reason for departing from the range of densities set out in Table 1 of Annex C to the consultation draft of PPS3; and that no purpose would be served by repeating this material in the RSS. However, we note that the table in question has been omitted from the final version of PPS3, which has now been published. In the circumstances, we consider that minimum density provisions should be included as policy in the RSS.

RECOMMENDATION

R6.6

Residential Density Policy

A new residential density policy should be included in the RSS as follows:

“The density of new residential development should not normally be less than 30 dwellings per hectare (dpha) net. In urban areas it should be at least 40 dpha net, with higher densities in locations that are within walking distance of good public transport services.”

Previously Developed Land (PDL)

- 6.56 Paragraph 42 of PPS3 indicates that Regional Spatial Strategies should set a target for the proportion of housing development that will be on PDL. The draft RSS sets an indicative regional target of 80%. The corresponding target in RPG13 is 70%. We accept that the target should be challenging, but have seen no convincing evidence to justify the higher value now proposed, particularly in view of the fact that the draft RSS also proposes

a substantial increase in the amount of new housing to be provided each year. We conclude that the target should remain at 70%.

- 6.57 Table 9.1 of the draft RSS contains separate indicative targets for development on PDL for groups of local authority areas. A number of participants argued that such targets should be set in local development documents in accordance with paragraph 43 of PPS3. However, we consider that targets for groups of districts are appropriately provided in the RSS. As in RPG13, these should be regarded as the minimum that local planning authorities should aim to achieve through co-operative working. Targets in local development documents should be consistent with that aim, but might be more demanding according to local circumstances.

The Distribution of Residential Development

- 6.58 Table 9.1 of the draft RSS provides for new housing provision to be concentrated within the regional centres and inner areas of Greater Manchester and Merseyside. We support this approach, which accords with the spatial principles that underpin the RSS, and with the priorities that we propose in Policy RDF1 above. Concentrating new housing in inner-city areas, close to job opportunities, services and high quality public transport, should have the effect of reducing the need to travel (particularly by car). This will have obvious benefits in terms of easing traffic congestion and restraining carbon emissions. It should also help make best use of existing assets and infrastructure. The effect will be to reverse the population decline that characterised these areas during the second half of the twentieth century, and help restore their vitality.
- 6.59 The amount of new housing proposed in Manchester, Salford and Liverpool substantially exceeds that implied by either the CLG's 2003-based household projections or the "recent trend" economic growth scenario. However, it reflects a clear policy decision, which we wholeheartedly support.

Manchester and Salford

- 6.60 The draft RSS proposes that the stock of dwellings in the cities of Manchester and Salford should increase by 91,800 between 2003 and 2021, net of clearance replacement. We have no reason to doubt that the scale of development proposed can be achieved. Taking Manchester and Salford together, the evidence is that there are over 40,000 dwellings now in the

pipeline (either under construction or the subject of outstanding planning permissions). Studies undertaken by the local planning authorities point to a capacity for a further 78,000 dwellings. Although the demolition of outworn housing is an important part of the renewal strategy, the number of dwellings to be cleared in the two cities up to 2021 is unlikely significantly to exceed 7,500.

- 6.61 Although the proposals for Manchester and Salford imply a relatively high density of residential development, we were told that a good mix of housing types could be provided, including family-size dwellings with gardens. In the circumstances, we see no grounds to reduce the proposed provision.

Pennine and Northern Manchester

- 6.62 The draft RSS provides for a net increase of 7,200 dwellings in Oldham, which implies an average increase of 400 dwelling per year between 2003 and 2021. However, we were told that the clearance of high density terraced housing in the Pathfinder Area would make this difficult to achieve. The scope for increasing the housing stock would be extremely limited until the latter part of the RSS plan period. We accept the local authority's view that an average gain of about 290 dwellings a year over the RSS period would be more realistic, implying a total net increase of 5,200 dwellings. We accept that the bulk of this increase would be achieved in the latter part of the RSS period, but consider that the local planning authority should establish detailed phasing arrangements in a development plan document. We see no need to recommend any change to the proposed housing provision for Rochdale or Tameside.
- 6.63 The draft RSS provides for a net increase of 10,800 dwellings in Bury. Bury Council told us that 600 net additional dwellings a year could be achieved in their district during the initial part of the RSS period, particularly through mill conversions and other "windfall" redevelopment schemes. However, they would not be able to allocate significant additional housing land without encroaching into the Green Belt. They feared that the supply of "windfall" opportunities would diminish in the latter part of the RSS period, and proposed that their overall annual average should be reduced by 100 dwellings. We agree that this would be appropriate, noting that the CLG's 2003-based household projection indicates an average annual increase of little more than 500 households a year in Bury during the RSS period. Accordingly, we consider that the net requirement for additional housing in Bury should be reduced to 9,000 dwellings.

- 6.64 Conversely, Bolton Council argued that their housing allocation should be increased. They explained that this would help meet the pressing need for affordable housing in their area. They saw no difficulty in achieving an average annual net gain of 650 dwellings a year, whilst ensuring that at least 80% of the proposed housing would be on PDL. There would be no reason to encroach onto Green Belt land. A number of house-builders also sought increased provision in Bolton. The 2003-based household projection and the "recent success" economic scenario suggest that the number of resident households in Bolton could increase substantially during the RSS plan period. Additional residential development in central Bolton would accord with the growth priorities set out in Policy RDF1 above. In view of these factors we consider that the RSS requirement for net additional housing in Bolton should be increased from 9,200 to 10,400 dwellings.
- 6.65 Wigan Council also pressed for their housing allocation to be increased above the net addition of 16,200 dwellings proposed in the draft RSS. In addition to helping with the provision of affordable accommodation, they argued that this would provide an opportunity to improve the quality of the housing stock in their Borough. Once again, we consider that an increase would be reasonable, and would accord with the spatial principles set out above. Both the 2003-based household projections and the "recent success" scenario point to a substantial increase in the number of resident households in Wigan during the RSS period. We conclude that the RSS should provide for a net increase of 17,600 dwellings in Wigan by 2021.

Southern Manchester/North East Cheshire

- 6.66 Trafford Council considered that the proposal for a net increase of 7,740 dwellings in their area would be inadequate to address the need for affordable housing. They pointed particularly to the potential for residential redevelopment in the northern parts of their area (including Trafford Park), which lie within the regional centre. A recent urban capacity study suggested that an average net increase of 675 dwellings a year might be achievable in Trafford over the RSS period. We have no reason to doubt that additional housing provision could be accommodated in the northern part of Trafford. We consider that the RSS should provide for a net increase of 10,400 dwellings in this Borough. This would be consistent with the spatial principles that should underlie the RSS. We further consider that paragraph 9.19(c) of the draft RSS should be amended to make it clear that the policy of restraint does not

apply in that part of Trafford which lies within or adjacent to the regional centre.

RECOMMENDATION

R6.7

Paragraph 9.19(c) – Southern Manchester/North East Cheshire

Paragraph 9.19(c) should begin with the words “except in that part of Trafford lying within or adjacent to the Regional Centre, continued restraint will be necessary ...”

- 6.67 Macclesfield Council were concerned that the proposed requirement for a net increase of 7,200 dwellings in their district would result in pressure for development in the Green Belt. They sought a lower figure. However, we note that there is an acute shortage of affordable housing in Macclesfield, and that there is net inward commuting to this area. These factors argue against a reduction in the amount of planned housing provision. We are not convinced that the provision of the quantity of housing proposed in the draft RSS would necessitate development in the Green Belt, particularly in view of the potential to increase the density of development within the boundaries of established settlements.
- 6.68 The draft RSS proposes a net increase of 5,400 dwellings in Congleton. Congleton Council argued that this would be insufficient, in view of the requirement for affordable housing in their district. They sought a net increase of 9,000 dwellings during the RSS period. However, it seems to us that this would result in a more diffuse pattern of development, and would entail more building on “greenfield” sites. In this connection, we note that Congleton Council also sought a relaxation of the target for new housing to be on previously developed land from 80% to 55%. The 2003-based household projection indicates that the number of households in Congleton is expected to increase by substantially less than 400 a year. Congleton is not identified as a regional town. It has long been subject to a policy of restraint, which is proposed to continue. A substantial increase in the amount of housing proposed here would not be consistent with the priorities for growth proposed in Policy RDF1 above. In view of this, we are not persuaded that any change

should be made to the draft RSS in respect of residential development in Congleton.

- 6.69 Similarly, we have no reason to consider that any changes should be made to the proposed amount of residential development in Stockport or Vale Royal. The relevant local planning authorities raised no objection to the draft RSS housing provisions for those districts.

South Cheshire

- 6.70 The draft RSS proposes a net increase of 8,100 dwellings in Crewe and Nantwich Borough. Although house-builders sought a higher figure, the local planning authority supported the draft RSS provision. However, they conceded that an average provision of 500 dwellings a year could possibly be achieved. We note that mean annual housing completions in Crewe and Nantwich have exceeded 500 during the past 5 years; and that the 2003-based projections indicate an average increase of more than 500 households a year in this Borough. Nevertheless, we accept the Assembly's view that a degree of caution is necessary, particularly as the Borough is likely to be part of a HMA that extends outside the North West Region, into Staffordshire. Increased housing provision here could affect regeneration prospects in North Staffordshire, where there is a Housing Market Renewal Pathfinder scheme. On balance, we consider that the quantity of housing proposed in Crewe and Nantwich should remain unchanged.
- 6.71 Cheshire CC argued that the target for new housing to be provided on previously developed land in Crewe and Nantwich should be increased from 55% to 80%. The Borough Council thought this too ambitious, but indicated that a figure of 60% could be achieved. We are inclined to rely on the Borough Council's local knowledge on this point, and propose that the target should be increased to 60%.

West Cheshire and the Wirral

- 6.72 Paragraph 9.19(f) of the draft RSS indicates that sufficient housing should be provided in the eastern part of the Wirral to support the economic growth and regeneration of the inner area of the Merseyside conurbation. On the other hand, a policy of restraint is to apply in the western part of the Wirral. The proposal for a net increase of 4,500 dwellings in the Wirral during the RSS period is the lowest for any of the former metropolitan districts, and seems to us to be somewhat modest.

The 2003-based projection indicates an average annual increase of 1,000 households in the Wirral throughout the RSS period.

- 6.73 Peel Holdings told us of the potential of redundant dockland in Birkenhead to accommodate a substantial amount of new housing. In view of this, they considered that the proposed housing provision for the Wirral should be increased to 600 a year. We understand that the potential of the former dockland area has only recently been recognised, and was not taken into account when the draft RSS was prepared. Wirral Council told us that the dockland estate in question was at the centre of the Housing Market Renewal Area, and that its redevelopment would support the efforts of the New Heartlands Pathfinder. The Council suggested that the housing allocation for the Wirral should be increased to 500 pa to take account of this.
- 6.74 Birkenhead forms part of the inner city area of the Merseyside conurbation. More intensive residential development there would be consistent with the spatial development priorities outlined in Policy RDF1 above. We consider that the RSS should make provision for a net increase of 9,000 dwellings in the Wirral.
- 6.75 We see no reason to propose any change to the housing provision for Ellesmere Port and Neston as shown in the draft RSS. Some house-builders pressed for an increased housing allocation in Chester, above the 7,500 net additional dwellings for which the draft RSS makes provision. However, we are not persuaded that this would be desirable, having regard to the importance of conserving the city's special character and preserving its Green Belt setting. We note that the 2003-based projection indicates an average increase of less than 300 households a year in Chester during the RSS period. We consider that the proposed annual average provision of more than 400 dwellings there should be ample. We consider that the reference to the "economic growth of Chester" in paragraph 9.19(l) of the draft RSS should be replaced by a reference to the "economy of Chester."

RECOMMENDATION

R6.8

Paragraph 9.19(I)

In paragraph 9.19(I) of the draft RSS, the reference to “the economic growth of Chester” should be replaced by a reference to “the economy of Chester”.

Mid Mersey

- 6.76 The draft RSS proposes a net increase of 6,840 dwellings in Warrington between 2003 and 2021. A number of private sector interests argued that the provision should be increased, as did GONW. They pointed out that the RES identifies opportunities for development at Warrington. We note that the CLG’s 2003-based projection indicates an annual increase of more than 700 households a year in Warrington throughout the RSS period. The “recent success” economic scenario points to an even higher level of growth.
- 6.77 Warrington BC provided us with new data, which corrected erroneous figures that they had originally supplied for inclusion in Table 4.13 of the RSS Technical Appendix. The new data showed that, in November 2003, there were outstanding planning permissions for over 3,700 new dwellings in the Borough. Furthermore, an urban capacity study indicated a supply of land sufficient for over 7,000 additional dwellings.
- 6.78 Nevertheless, we recognise that Warrington has witnessed considerable and rapid expansion in recent years. A substantial part of the land now identified as having potential for future development is a legacy from the period when Warrington was a New Town, and different policy priorities applied. We are conscious that the early development of this land could affect the Council’s efforts to regenerate the older parts of the town. It could also have an impact on planned development and regeneration schemes in neighbouring settlements in St Helens and Halton. We note that the Green Belt boundary around Warrington has only recently been agreed. Since the Green Belt is to be regarded as a permanent feature, there may be merit in conserving land with development potential for use in the longer term.

- 6.79 On balance, we are not persuaded that there are sufficient grounds to recommend an increase in the housing provision for Warrington proposed in the draft RSS. Neither do we see any reason for changes to be made to the quantity of housing proposed in Halton or St Helens. We note that the relevant local authorities do not object to the draft RSS housing provisions. However, Halton Council indicated that they would find the proposed 80% target for residential development on PDL challenging. We have seen no evidence to support a higher target for Halton or St Helens than the 65% set in RPG13.

Liverpool and Knowsley

- 6.80 The draft RSS proposes a net increase of 35,100 dwellings in Liverpool. We were told that there is currently a house-building boom in the city, with record increases of about 3,000 dwellings being achieved in each of the last 2 years. In April 2006, there were 6,000 dwellings under construction and outstanding planning permissions for the erection of a further 17,700 dwellings. The City Council supported the proposed RSS provision, which would help regenerate and repopulate the city, and improve the quality of its housing stock. In making their assessment, they had taken account of the clearance programme, which is likely to be scaled down in future years. The concentration of new housing in the regional centre and the inner area of the Merseyside conurbation would be consistent with the spatial strategy that underpins the RSS. We support the proposed allocation.
- 6.81 Knowsley Council supported the proposed increase in housing provision in their district. It would help achieve a better range and choice of housing and permit redevelopment in some unsatisfactory overspill estates. However, they questioned the proposed target that 90% of the new housing should be on PDL, pointing out that there was scope for residential development in some poor quality open areas. We note that the target for Knowsley in RPG13 is for 65% of new dwellings to be on PDL. We have seen no evidence to persuade us that a higher figure is justified.

South West Lancashire

- 6.82 The same applies in Sefton and West Lancashire, where the draft RSS proposes that 80% of new residential development should be on PDL. West Lancashire Council indicated that they were content with the quantity of new residential development proposed for their area in the draft RSS, the greater part of

which would be located in the regional town of Skelmersdale. However, there are few "brownfield" sites available there. The Council thought it unlikely that more than 45% of the proposed housing could be provided on PDL. However, a target of 65% might be achieved in South West Lancashire if West Lancashire and Sefton were taken together.

- 6.83 Sefton Council also supported the quantity of residential development proposed for their area, but shared the view that it might not be possible to achieve the 80% target for PDL across the two districts. We note that the target in RPG13 is for 65% of the new housing in these two districts to be on PDL. We have seen no evidence to persuade us that a higher figure is justified. We have no reason to recommend any change to the quantity of residential development proposed in Sefton or West Lancashire.

The Fylde Peninsula

- 6.84 The local planning authorities on the Fylde Peninsula (Blackpool, Wyre and Fylde) were generally supportive of the proposed requirement for additional housing. However, they expressed concern that the proposed target to provide 80% of new housing on PDL was unrealistically high. We note that the corresponding target in RPG13 is 65% and have seen no evidence to justify an increase. Whilst we note that there is some private sector pressure for a greater increase in the proposed housing provision on the Fylde peninsula, we can see no reason to change the housing requirement proposed in the draft RSS.

Greater Preston

- 6.85 Although there was general agreement about the aggregate housing provision proposed in Greater Preston, various views were expressed about how this should be distributed between the three local authorities (Preston, South Ribble and Chorley). Some private developers thought the proposed provision in Preston was too large, while others thought it too small. Preston is a regional city, with good public transport services, employment opportunities, shops and other facilities. The concentration of new residential development here would be consistent with the spatial priorities set out in Policy RDF1 above. We conclude that the proposed provision in Preston should remain at 9,120 net additional dwellings.

- 6.86 However, in line with the views expressed by the local authorities, we accept that there should be some redistribution of the proposed housing provision between South Ribble and Chorley, to reflect the availability of sustainable development opportunities. We propose that provision should be made for a net increase of 7,550 dwellings in each of these districts. We accept the view that the previously developed land target for Greater Preston should be reduced from the 80% proposed in the draft RSS to 70%.

East Lancashire

- 6.87 The proposed net increase in housing provision in Blackburn with Darwen, Hyndburn, Ribble Valley, Burnley and Rossendale was supported by the relevant local authorities. We see no reason to recommend any change.
- 6.88 Pendle BC considered that the proposal to limit net additional house-building in their area to 3,420 dwellings would stifle regeneration. They sought an increase to 5,500 net additional dwellings. However, we are concerned that so great an increase in the supply of residential accommodation could adversely affect the recovery of the market for existing housing. We note that the CLG's 2003-based household projection indicates an average increase of only about 220 households a year in Pendle during the RSS period. This suggests that there may not be a demand for 5,500 additional dwellings. None of the settlements in Pendle has the status of a regional town, and the further concentration of residential development there would be inconsistent with the spatial development priorities proposed in Policy RDF1 above.
- 6.89 The Elevate Pathfinder, who support the housing provisions in the draft RSS, told us that the market in East Lancashire (including Pendle) remains sensitive. However, they hoped that there would be scope for additional house-building in Pendle and Burnley in the latter part of the RSS period. On balance, we do not consider that that any change should be made to the provision in Pendle proposed in the draft RSS.
- 6.90 The draft RSS proposes a PDL target of 80% for the whole of East Lancashire. This was not universally supported by the relevant local authorities, although some considered the target to be both desirable and achievable within their own areas. Nevertheless, on the evidence available, we are not persuaded that a case has been made for the target to be raised above the level of 65% contained in RPG13. It will be open to local

planning authorities to propose a higher figure in their local development frameworks if this can be supported by evidence.

Lakes and Morecambe Bay

- 6.91 Lancaster CC were content with the housing provision in the draft RSS, but considered that the target for PDL should be raised from 50% to 70%, in order to assist the process of urban regeneration, particularly in Morecambe. We agree that this would be desirable, but otherwise see no need to change the city's proposed housing provision.
- 6.92 The draft RSS makes provision for a net increase of 2,100 dwellings in the Lake District National Park. However, having undertaken a capacity study, the National Park Authority sought a minimum provision of 60 dwellings a year to meet local needs. This would equate to the provision of 1,080 dwellings during the RSS period. We accept the Authority's opinion that it would be difficult to make provision for 2,100 additional dwellings, particularly in view of the priority that should be given to the protection of the landscape in the National Park. We share the National Trust's view that the amount of new housing to be provided in the National Park should be governed by considerations of environmental capacity.
- 6.93 However, a modest amount of residential development should be permitted in the National Park to meet local needs. We share the Assembly's view that the housing requirement should be expressed as a maximum. To do otherwise would be likely to generate considerable pressure for development and would be inconsistent with the approach adopted elsewhere. In the circumstances, we consider that the housing requirement for the National Park should be reduced to a maximum increase of 1,080 dwellings during the RSS plan period.
- 6.94 The draft RSS proposes an aggregate increase of 11,500 dwellings in those parts of South Lakeland and Eden that lie outside the National Park. We note that there are particular problems concerning the provision of affordable housing in south-east Cumbria, and we are conscious of the representations that have been made in favour of a higher figure. However, neither of the relevant local authorities objected to the proposed housing provision, which we consider to be about right. The draft RSS target that 50% of new dwellings should be on PDL is carried forward unchanged from RPG13. The evidence of each of the relevant local authorities is

that this will be difficult to meet. However, we do not consider that a less challenging target should be introduced.

West Cumbria, Furness and North Cumbria

- 6.95 The draft RSS provides for an aggregate net increase of 8,940 dwellings in those parts of Allerdale and Copeland that lie outside the National Park. However, we understand that the West Cumbria Masterplan proposes a net increase of 14,000 dwellings in these two districts between 2003 and 2021, a figure which reflects the substantial growth in employment that is envisaged. Cumbria Vision and the relevant local planning authorities were concerned that the RSS should not impede development on this scale, and thereby hamper the regeneration of West Cumbria.
- 6.96 However, we note that the West Cumbria Masterplan was still subject to consultation at the close of the EiP. As far as we are aware, it has not been the subject of a sustainability appraisal. The CLG's 2003-based projections suggest an increase of less than 9,000 household in Allerdale and Copeland combined during the RSS period. There is a clear danger that, without substantial inward migration to West Cumbria, the provision of 14,000 additional dwellings might cause the housing market there to weaken, with adverse consequences for regeneration. In the light of these considerations, we take the view that the housing requirement proposed in the draft RSS should remain unchanged. However, if the West Cumbria Masterplan is successful in attracting new sources of employment to West Cumbria, it may be necessary to reconsider this requirement when the RSS is next reviewed.
- 6.97 Both Allerdale and Copeland Councils objected to the target that 80% of new housing in their areas should be on PDL. On the evidence available, we can see no justification for increasing this target above the level of 50% contained in RPG13. We see no reason to change the draft RSS housing provision for either Barrow in Furness or Carlisle.

RECOMMENDATION

R6.9

Table 9.1

Table 9.1 should be amended as follows:

Table 9.1 – Distribution of Regional Housing Provision 2003-2021			
	Maximum Housing Increase 2003-2021 (Net)	Mean Annual Increase	Indicative Target on Previously Developed Land
NORTH WEST	416,000	23,111	70%
Manchester/Salford			
Manchester	63,000	3,500	90%
Salford	28,800	1,600	
Pennine Manchester			
Oldham	5,200	289	80%
Rochdale	7,200	400	
Tameside	13,500	750	
North Manchester			
Bolton	10,400	578	80%
Bury	9,000	500	
Wigan	17,600	978	
S Manchester/ NE Cheshire			
Stockport	8,100	450	80%
Trafford	10,400	578	
Congleton	5,400	300	
Macclesfield	7,200	400	
Vale Royal	9,000	500	
South Cheshire			
Crewe and Nantwich	8,100	450	60%

	Maximum Housing Increase 2003-2021 (Net)	Mean Annual Increase	Indicative Target on Previously Developed Land
W Cheshire and Wirral			
Chester	7,500	417	80%
Ellesmere Port & Neston	7,200	400	
Wirral	9,000	500	
Liverpool/Knowsley			
Liverpool	35,100	1,950	90%
Knowsley	8,100	450	65%
Mid Mersey			
Halton	9,000	500	65%
St Helens	10,260	570	
Warrington	6,840	380	80%
SW Lancashire			
Sefton	9,000	500	65%
West Lancashire	5,400	300	
Fylde Peninsula			
Wyre	3,700	206	65%
Blackpool	8,000	444	
Fylde	5,500	306	
Greater Preston			
Chorley	7,500	417	70%
Preston	9,120	507	
South Ribble	7,500	417	
Central East Lancashire			
Blackburn w Darwen	8,800	489	65%
Hyndburn	3,400	189	
Ribble Valley	2,900	161	

	Maximum Housing Increase 2003-2021 (Net)	Mean Annual Increase	Indicative Target on Previously Developed Land
East Lancashire			
Burnley	2,340	130	65%
Pendle	3,420	190	
Rossendale	4,000	222	
Lakes and Morecambe Bay			
Lancaster	7,200	400	70%
Eden (outside LDNP)	4,300	239	50%
S Lakeland (outside LDNP)	7,200	400	
Lake District National Park	1,080	60	
West Cumbria and Furness			
Allerdale (outside LDNP)	4,800	267	50%
Copeland (outside LDNP)	4,140	230	
Barrow in Furness	2,700	150	80%
North Cumbria			
Carlisle	8,100	450	50%

Amended Housing Provision

6.98 The proposed housing provision in each district suggested above would have the effect of increasing the number of dwellings to be provided in the North West Region between 2003 and 2021 above the level proposed in the draft RSS. Whereas the draft RSS proposes that a maximum of 411,160 additional dwellings (net of clearance replacement) should be provided during this period, our recommendation is that this figure should be raised to 416,000, an increase of less than 1.2%.

- 6.99 The figure of 416,000 would match the increase shown in the CLG's 2003-based household projections. We consider that with a significantly lower figure, there would be a risk that the supply of additional housing would fail to meet the need. The consequences might include increased house prices; more homelessness; and increased sharing and overcrowding of residential accommodation. This would be likely to have adverse implications for public health and would scarcely help improve educational attainment.
- 6.100 On the other hand, the environmental consequences of a significantly higher figure have not been tested. These might include difficulties in providing adequate water supply and sewage management facilities; and an adverse effect on the integrity of European nature conservation sites. We consider that the net increase of 416,000 dwellings should be regarded as both a target and a ceiling.

Affordable Housing

- 6.101 Policy L5 of the draft RSS deals with affordable housing. It contains no numerical targets, but indicates that local development frameworks should set out requirements on the basis of sub-regional housing market assessments, establishing appropriate quotas and thresholds for provision.
- 6.102 Shelter argued that the RSS should provide a regional target for affordable housing provision. In London, a target of 50% of all new dwellings had been adopted; in the South West the target was a minimum of 30%, rising to 60% in areas of the highest demand. The RSS should adopt a similar approach. There was acute need in the North West, where there were now about 23,500 homeless households, and about 60,000 households living in overcrowded conditions. There was a particular need for more social housing for rent. Some 200,000 council houses had been sold under "Right to Buy" legislation. In order to address the resulting shortage, 20% of all dwellings built in the immediate future should provide social rented accommodation.
- 6.103 NWEL favoured the inclusion of district-level affordable housing targets and thresholds in the RSS. They considered that the minimum target should be 30%. However, they objected to the promotion of development on rural exception sites in Policy L5, since this should be regarded as a last resort.
- 6.104 CPRE recognised the serious problem associated with the lack of affordable housing. The draft RSS SA had noted that in some

areas of the North West, 80% of households fell below the affordability threshold. The RSS should include a minimum requirement that 30% of new housing should be in the form of affordable accommodation, rising to 60% in areas of acute need.

- 6.105 On the other hand, GONW supported Policy L5. Given the available evidence, they thought it would be difficult to establish a regional affordable housing target. A number of local authority representatives also felt that a regional affordable housing target would be inappropriate.
- 6.106 Representatives of the volume house-builders considered that the quantity of affordable housing to be provided should be determined at a local rather than a regional level. They stressed the need to take account of the commercial effect of setting targets too high. They were concerned that if a 50% target were adopted, land would not be brought forward for residential development. The amount of affordable accommodation that could be provided would also be affected by high site preparation costs, resulting for example from decontamination and the provision of infrastructure. Some house-builders also objected to the proposed use of planning conditions and obligations to secure the local occupancy of new market housing, as seemed to be envisaged in Policy L5 and paragraph 15.9 of the draft RSS.
- 6.107 MPU questioned the references to particular areas of need in Policy L5. It was now evident that the need for affordable housing applied across the region. Elevate East Lancashire confirmed that the need for affordable housing was not confined to areas of high demand, and applied within their Pathfinder area.
- 6.108 Although PPS3 indicates that the RSS should include an affordable housing target for the region (and for each HMA) the evidence available does not permit us to recommend specific figures. However, in our view, such targets should be included when the RSS is next reviewed. In the interim, local planning authorities will be best placed to assess the need for affordable accommodation in their areas, on the basis of local knowledge derived from their studies of local housing markets.
- 6.109 The increase in housing provision proposed in the draft RSS will undoubtedly help augment the supply of affordable accommodation. However, we are concerned at the potential scale of the problem; and we note, particularly, the need for

additional social housing for rent. Table 4.8 of the RSS Technical Appendix amply demonstrates the meagre quantity of new social housing that is currently being built in the North West. The evidence of the massive depletion in the stock of social rented accommodation is clear. We are not confident that this problem will be solved by land use planning policies and planning control, although they can undoubtedly play a part in increasing the stock of affordable accommodation.

- 6.110 We recognise that the application of local targets for affordable housing will have to be sensitive to considerations of commercial viability, and that unusually high development costs might affect the amount of affordable accommodation that can be delivered in some cases. However, these are site specific matters, which cannot reasonably be governed by regional policy.
- 6.111 The identification of particular areas that are in need of affordable housing in Policy L5 seems to serve little purpose. It pre-empts the results of the forthcoming sub-regional assessments. We have no reason to doubt the evidence that the need is widespread, and affects areas (for instance in East Lancashire and parts of Merseyside) that are not currently mentioned in Policy L5. Accordingly, we consider that the second paragraph of Policy L5 should be deleted.
- 6.112 As Policy L5 of the draft RSS is concerned with the provision of affordable housing, we consider that its reference to local occupancy criteria must apply in that context, rather than to general market housing.
- 6.113 We do not consider any change to be necessary in respect of that part of Policy L5 of the draft RSS which advocates the active promotion of rural exception sites as a mechanism for delivering affordable housing. This is broadly in line with paragraph 30 of PPS3, which encourages local planning authorities to consider such an approach.

RECOMMENDATION

R6.10

Policy L5

Policy L5 should be modified by the deletion of the second paragraph.

Rural Housing

6.114 Paragraph 38 of PPS3 refers to the need to provide housing in rural areas, in a way that assists people to live near their work and benefit from key services. We consider that, if amended in line with our recommendations, Policies RDF2, RDF3 and L5 will make adequate provision for housing in local centres and elsewhere in the countryside, consistent with these criteria.

Gypsies and Travellers

6.115 Paragraph 21 of PPS3 indicates that regard should be had to the need to accommodate gypsies and travellers. However, the draft RSS makes no specific provision for this. We understand that the Assembly have commissioned a study of this matter, but the results were not available in time for the EiP. In our view the study should inform an early review of the RSS.

CHAPTER 7 TRANSPORT IN THE NORTH WEST

Suggested Amendments of the Regional Transport Strategy (RTS)

- 7.1 The RTS forms an integral part of the draft RSS. It includes a discrete statement of objectives (in Chapter 4 of the draft RSS) and a series of RTS policies that are distinguished by a “bus” symbol. These include a number of policies governing the distribution of future development, which appear at various places in the draft RSS. However, specific policies for the provision and management of transport systems are grouped together in Chapter 10.
- 7.2 Prior to the EiP, Assembly Officers suggested substantial amendments to Chapter 10, which included new policies and supporting text, and the re-ordering and renumbering of policies from the draft RSS (NWRA Briefing Paper 20). The suggested amendments addressed a number of the points that had been raised in the representations, and were welcomed by a number of participants. The main changes were to introduce an integrated multi-modal approach to the examination of transport issues, and to introduce a regional framework for managing travel demand.
- 7.3 Generally we welcome the suggested revisions, which we consider improve the clarity of the transport strategy. We consider that an integrated approach to transport problems, cutting across different transport modes, will be beneficial. We also consider that the introduction of a regional approach to demand management will be essential in dealing with the growing problems of traffic congestion and air pollution, including greenhouse gas emissions.

RECOMMENDATION

R7.1

Transport in the North West

Subject to the modifications recommended below, Chapter 10 of the draft RSS should be replaced by the amended text in NWRA Briefing Paper 20.

- 7.4 Discussion at the EiP focussed largely upon the amended draft of Chapter 10. We shall do likewise in this Report. To do otherwise would be likely to give rise to confusion, not least because of changes in the numbering of policies and paragraphs. So further references to policy and paragraph numbers in Chapter 10 relate to the NWRA officers' suggested revision, rather than the draft RSS.
- 7.5 A number of participants queried the selection of the RSS policies that constitute the RTS. As indicated in paragraph 2.16 of PPS11, the RSS should be "an integrated planning *and* transport strategy." Policies that influence the location, scale, density and design of development can affect the need to travel, the length of journeys, the transport mode used, and the accessibility of jobs, schools, shops, leisure facilities and other services. In view of this, it seems to us that the distinction between RTS policies and other RSS policies has little, if any, value. We consider that it should be abandoned.

RECOMMENDATION

R7.2

Distinguishing RTS Policy

The distinction between RTS policies and other RSS policies should be abandoned.

Objectives

- 7.6 We consider that Chapter 10 of the RSS should open with a clear statement of thematic transport objectives, which should reflect the overarching spatial principles of the RSS. The overarching principles include:
- promoting sustainable communities;
 - promoting sustainable economic development;
 - making the best use of existing resources and infrastructure;
 - managing travel demand and reducing the need to travel;
 - increasing accessibility, and marrying opportunity and need;
 - promoting environmental quality; and
 - reducing emissions.

- 7.7 These principles run through the RSS. It is not necessary to repeat them in each thematic Chapter; but it is important that they should be seen to underpin the RTS.
- 7.8 Proposed objectives for the RTS are included in paragraph 4.2 of the draft RSS. Further thematic transport objectives were suggested to us by the Assembly, GONW and AGMA. To a large degree these overlap one another, but adopt different wording, and have slightly different nuances. Our views are as follows.
- 7.9 First, making the best use of existing assets and infrastructure requires that transport facilities should be well maintained. Public safety and journey time reliability require that the transport system should be in good order. This is unexciting, but essential.
- 7.10 Second, we think that it should be an objective of the RTS to tackle congestion and overcrowding. These are major sources of inconvenience and discomfort to the public. Congestion is an impediment to economic success, adding to the cost of freight movement and detracting from journey time reliability. It has considerable environmental costs, particularly in terms of emissions to air, which detract from public health and contribute to global warming. Overcrowded trains and buses will deter a switch from car use to public transport. The evidence is that there is already acute congestion on highways and overcrowding on public transport services in parts of the North West, particularly in peak periods.
- 7.11 Third, it should be an objective of the RTS to secure a modal shift towards the use of more sustainable modes of transport. Walking and cycling should be promoted for short trips. People travelling along well-used routes should be encouraged to take public transport rather than private cars, wherever practicable. The use of more sustainable modes would help ease congestion, reduce emissions, and improve public health. For similar reasons, where practicable, the movement of freight by water or rail should be encouraged. Achievement of a significant modal shift implies a corresponding change in the pattern of transport investment, and the concerted management of travel demand.
- 7.12 Fourth, it should be an objective of the RTS to secure safe and efficient access by sustainable modes between residential areas and key destinations, including schools, workplaces, shops and other services. The objectives of reducing congestion and securing modal shift depend upon the availability of adequate access by sustainable means.

- 7.13 Fifth, the RTS should aim to improve surface access for both passengers and goods, by sustainable modes, to the region's key transport gateways. The objective should also be to improve interchange facilities at these gateways.
- 7.14 Sixth, the RTS should seek to reduce the adverse impacts of transport, particularly in terms of personal safety, environmental degradation, residential amenity and social exclusion. This applies particularly at accident "black spots"; in areas that suffer poor air quality, excessive noise or severance due to transport operations; and in towns and rural areas that are particularly worthy of conservation.
- 7.15 Seventh, we think it essential that it should be the objective of public policy to integrate the management and planning of transport systems. Success in achieving the foregoing objectives is unlikely to be achieved if transport operations are considered in isolation from one another, with planning and investment decisions being taken in a fragmented fashion by a number of ill-coordinated bodies.

RECOMMENDATION

R7.3

Objectives of the Regional Transport Strategy

The following text should be inserted after paragraph 10.1:

"The Regional Transport Strategy embraces the spatial principles and the regional development framework set out above. In particular it seeks to:

- **maintain existing transport infrastructure in good order;**
- **tackle congestion and overcrowding in the region's main movement corridors (particularly the routes into the main centres in the Manchester, Liverpool and Central Lancashire City Regions; on the strategic north-south corridor south of Preston; and on east-west routes between the Liverpool, Manchester and Leeds City Regions).**
- **secure a shift towards the use of more sustainable modes of transport;**

- **secure safe and efficient access between residential areas and key destinations, including centres of employment, schools, shops and other services;**
- **improve surface access and interchange arrangements at the key national and regional gateways (as defined in Appendix RT3.1);**
- **reduce the adverse impacts of transport, in terms of safety hazards, environmental degradation, residential amenity and social exclusion;**
- **integrate the management and planning of transport systems, so as to achieve these outcomes."**

Integrated Transport Networks

7.16 Policy RT1 of the amended draft RSS deals with integrated transport networks. It emphasises the need to make best use of existing infrastructure, improve journey time reliability in the main transport corridors, and improve accessibility to key international gateways. In our view, accessibility to the nationally important rail stations and terminals is at least as important as accessibility to the region's airports. We therefore propose that the word "international" should be deleted from the last sentence of this policy. We further propose that the region's key gateways should be specified. Otherwise, we see no reason to recommend changes to the policy or the supporting text.

RECOMMENDATION

R7.4

Policy RT1 – Integrated Transport Networks

The word "international" should be deleted from the final sentence of Policy RT1, and the following words should be added to that sentence– "as listed in Appendix RT3.1".

Managing Travel Demand

- 7.17 Policy RT2 of the amended draft RSS introduces a regional framework for managing travel demand. We consider this to be essential. Demand management can be used to change travel behaviour generally, securing an overall reduction in car use with concomitant environmental benefits. It can also be used to change the time, mode and route of travel, thereby easing congestion and making best use of existing resources. In either case, the use of demand management would be consistent with the objectives outlined above.
- 7.18 Policy RT2 focuses particularly on the need to reduce car use for commuting and education trips, during peak periods, in regional towns and cities; and to reduce car use by visitors to major rural tourist attractions, where this has an adverse impact on amenity and on the environment. We accept that these are legitimate matters of immediate concern.
- 7.19 Stress maps produced by the Highways Agency show that there is existing peak period congestion on parts of the M6 around Preston and south of Wigan; on the M53, A55 and M56 around Chester; on the A556/M56 between Manchester and the M6; on the A5036/M58 access to the Port of Liverpool; on the M60 Manchester orbital route; on the M62/M602 between Manchester and Liverpool; on the M65 at Preston and Blackburn; on the A56/M66 between Burnley and Manchester; on the A585 between Fleetwood and the M55; and on the A595 south of Whitehaven. The list is not exhaustive and excludes the congested radial routes into central Manchester and Liverpool. There is every indication that, in the absence of appropriate action, conditions will deteriorate and the problems will spread. We consider that the RSS should include a map of those locations where the need for demand management is most pressing.
- 7.20 Policy RT2 stresses the need for a coordinated approach to managing travel demand. We agree with this. Uncoordinated restraint on car use in one area could have unacceptable effects in adjacent areas. We consider that the Assembly should have a role in supervising the introduction of management measures, where these are likely to have implications that extend across local authority boundaries. Furthermore, we accept the argument that the demand management policy should apply to all highway and transport authorities with responsibilities in the North West, not merely local authorities.

- 7.21 Improvements to public transport may often be necessary to support measures to discourage car use, but it may be possible to make headway without these. For instance, the adoption of green travel plans by workplaces and schools could promote car sharing, walking, and cycling along dedicated routes. We consider that the final sentence in the first paragraph of Policy RT2 should be modified to avoid the impression that public transport improvements are a prerequisite of demand management measures.
- 7.22 Policy RT2 contains five bullet points that list potential demand management measures. We support the first two bullet points, which deal respectively with the location of development in such a way as to minimise the need for car use, and the introduction of “smarter choices”. Examples of “smarter choices” are given in paragraph 10.6 of the revised draft RSS and a cross reference to this would be helpful.
- 7.23 The third bullet point deals with the reallocation of road space, and fiscal measures such as parking fees and road user charging. We do not consider it necessary that local authorities should have to define pre-conditions for road user charging. Evidence of the need for restraint in car use is already available. Road user charging is one of a suite of measures that can help secure restraint. Whether it should be employed in any particular case will depend on the alternatives available; the likely social, economic and transport consequences; and the public and political acceptability of such a measure. We consider that the final sentence of the third bullet point should be deleted.
- 7.24 The fourth bullet point deals with on-street parking controls. These may be used, where appropriate, to deter car commuting and secure modal shift. They are not necessarily confined to circumstances in which specified users are to be given priority in the use of road space. We consider that the bullet point should simply say “make greater use of on-street parking controls and enforcement.”
- 7.25 The final bullet point in Policy RT2 refers to Table 10.1, which sets out maximum parking standards for certain forms of new development. The table contains one set of “regional” standards, and a second (more stringent) set of “urban” standards. The sub-headings in this table should be amended to reflect the current Use Classes Order. A footnote indicates that the “urban” standards are to apply in Regional Centres,

Regional Towns and Cities, and KSCs. In our view this could give rise to anomalies.

- 7.26 For instance, development in a rural KSC, such as Aspatria, Milnthorpe or Wigton, would be subject to the same restrictive car parking standard as a development in central Manchester. It would be subject to a more restrictive standard than might apply in those parts of Manchester that are not defined as KSCs. But rural centres in Cumbria are unlikely to be as well served by public transport as the outer parts of Manchester. Residents of the sparsely populated areas that they serve may have no option but to drive to their local centre for their everyday needs. We consider the more relaxed “regional” parking standard to be appropriate to KSCs in rural areas. This approach would be consistent with the supporting text in paragraph 10.7 of the amended draft RSS. We support AGMA’s view that the “urban” standard should apply throughout the administrative areas of Greater Manchester, Merseyside, Halton and Warrington. We also consider that the maximum parking standard for storage and distribution uses should be amended to 1 space per 100 sq m, in line with PPG13.
- 7.27 Neither Policy RT2 nor its supporting text refer to “park and ride” schemes, which can be effective in reducing the length of car journeys and easing congestion in town and city centres. We recognise that such schemes can have perverse consequences and must be introduced with care. Nevertheless, we consider that reference to them should be included among the examples of “smarter choices” in paragraph 10.6 of the amended draft RSS.

RECOMMENDATION

R7.5

Policy RT2 - Managing Travel Demand

A map should be included in the RSS, showing those general locations in which the need for travel demand management is most pressing.

Policy RT2 should begin with the words “The Regional Assembly, local authorities, and other highway and transport authorities should develop a coordinated approach to managing travel demand ...”.

The final sentence of the first paragraph of Policy RT2 should be amended to read “Public transport improvements may accompany measures to discourage car use, which should be introduced through the development of a comprehensive approach to travel planning”.

The reference to “smarter choices” in Policy RT2 should be cross-referenced to the examples in paragraph 10.6.

The final sentence should be deleted from the third bullet point in Policy RT2.

The fourth bullet point in Policy RT2 should read “make greater use of on-street parking controls and enforcement”.

In Table 10.1, the words “Food and Drink” should be replaced by “Restaurants and Cafes”; a new sub heading “A5: Hot Food Takeaways” should be inserted above the entry for “Fast Food & Drive Through”; the references to “hostels” should be deleted; and the “regional” and “urban” standard for Storage and Distribution should be amended to 1 space per 100 sq m in each case.

Table 10.1 should indicate that “urban” standards will apply throughout the administrative areas of Greater Manchester, Merseyside, Halton and Warrington and in Regional Towns and Cities; and that the “regional” standards will apply elsewhere, including in Key Service Centres in non-metropolitan areas.

The words “park and ride schemes,” should be inserted after the words “car clubs” in paragraph 10.6. The final sentence of paragraph 10.6 should be deleted.

Public Transport Framework

- 7.28 Policy RT3 of the amended draft RSS defines regional public transport corridors, by reference to Appendix RT3.1. Appendix RT3.1 contains a much simplified variant of the regional public transport framework described in Appendix RT1.1 of the draft RSS as originally submitted. It focuses on those corridors that link the North West and the rest of the UK; that link the three City Regions and the other Regional Towns and Cities in the

North West; and that serve the region's airports. It also defines a hierarchy of public transport interchanges. The framework is represented in a generalised way in a schematic diagram. This also shows the public transport commuter networks that serve the three City Regions; and public transport networks outside the City Regions.

- 7.29 A number of participants considered the amended framework to be unduly simplistic, missing out a number of important public transport corridors and interchanges. There were requests that a number of specific routes or services should be shown. These included the bus connections between Manchester and East Lancashire; and between Penrith, Keswick and West Cumbria. They also included the rail routes between Wigan and Liverpool via Kirkby; between Wigan and Southport; between Preston and Liverpool via Ormskirk; and between Carlisle and Leeds. However, it is important to recognise that the framework does not describe specific public transport routes or services. For instance the public transport corridor between the Manchester and Central Lancashire City Regions embraces separate links from Manchester to Burnley, Blackburn and Preston.
- 7.30 In the absence of quantitative evidence to the contrary, we are not persuaded that additional corridors should be shown as being of regional importance. We take the view that the RSS should focus on regionally important patterns of movement. Locally important public transport arrangements will doubtless be covered in local plans. In general we support the amended Appendix. However, we consider that more detail should be provided in the sub-regional diagrams in Part 4 of the RSS, which should show the regional highway network, railways, and regional interchanges.
- 7.31 The proposed hierarchy of public transport interchanges is confusing. Interchanges in Manchester and Liverpool are distinguished from interchanges elsewhere in the region, but it is not clear why this distinction is made. Crewe and Carlisle are listed as being among "other key regional interchanges for the City Regions" when neither is in a City Region. A number of participants argued that Preston should be included in the top level of the hierarchy. However, the evidence of Lancashire CC was that "very few people from the regional towns of Blackburn or Burnley travel via Preston, and would use either the Blackburn-Manchester rail corridor or the X43 bus corridor". In view of its limited role in serving the Central Lancashire City Region, we consider that Preston should properly be included in the second tier of the hierarchy. We have considered suggested

revisions proposed by AGMA and others, and conclude that this section of the Appendix should be clarified.

RECOMMENDATION

R7.6

Appendix: Regional Public Transport Framework

Appendix RT1 of the draft RSS should be replaced by Appendix RT3.1 as set out in the NWRA's Briefing Paper 20.

The section of Appendix RT3.1 entitled "Public Transport Framework Hierarchy of Interchanges" should be amended as follows:

"National Gateways

These are the most significant gateways, in terms of the amount of passenger and/or freight traffic. They provide access to international and UK markets. They comprise:

- **Manchester Airport**
- **The Mersey Ports**
- **The Manchester Ship Canal**
- **Liverpool John Lennon Airport**
- **Manchester Piccadilly Railway Station**
- **Liverpool Lime Street Railway Station**

Regional Gateways and Interchanges

These are interchanges and gateways which have more than sub-regional significance. They comprise:

- **Other Central Manchester Railway and Bus Stations**
- **Other Central Liverpool Railway and Bus Stations**
- **Preston Railway and Bus Stations**
- **Crewe Railway Station**
- **Chester Railway Station**
- **Warrington Railway and Bus Stations**
- **Wigan Railway and Bus Stations**
- **Carlisle Railway Station**
- **Blackpool Airport**
- **The Port of Heysham**
- **The Port of Fleetwood"**

- 7.32 Policy RT3 states that plans and strategies should seek to reduce overcrowding on rail routes in the regional public transport corridors. We consider that it would be helpful if the RSS defined more precisely where overcrowding on public transport services occurs, and whether there are significant gaps in provision.
- 7.33 For instance, Cumbria CC told us that there is congestion on the rail network in their area, although the draft RSS makes no reference to this, and we have seen no quantitative evidence. Paragraph 10.9 of the suggested amended draft RSS indicates that overcrowding is already an issue on a number of rail and bus routes into the regional centres of Manchester and Liverpool. Among other things, the proposed concentration of future development and the introduction of demand management measures to constrain car use are likely to result in a significant increase in demand on these routes. In our view, this warrants urgent action.
- 7.34 However, paragraph 10.9 indicates that opportunities for the physical expansion of the rail network are restricted by the high cost of providing new infrastructure. It also implies that issues relating to regulation and revenue support may hamper the achievement of requisite improvements to the public transport provision. It concludes that it will be necessary to make best use of existing facilities.
- 7.35 It seems that the Assembly and the local authorities have only limited influence over investment in (or the operation of) public transport services. We consider that, in order to relieve congestion and overcrowding, a very high priority should be given to improvements to the Manchester rail hub, to the development of light rapid transit solutions in major urban centres, and to the provision of additional capacity on heavily used bus routes. We hope that these measures will be given a higher priority in future investment programmes and in the next review of the RSS.
- 7.36 Policy RT3 proposes that consideration should be given to providing car parks at regional public transport interchanges. We are keen to promote the use of public transport, and we recognise that "park and ride" has a role to play in this. However, a number of the regional public transport interchanges are located at the heart of congested urban areas. We have serious misgivings about the prospect of more car traffic being attracted into city and town centres. In our view, it would be more sensible to provide "park and ride" facilities

where they can intercept motorists at the earliest practicable points on their journeys, enabling them to proceed to the appropriate regional interchange by public transport.

- 7.37 Policy RT3 proposes that local authorities should introduce measures to enhance the accessibility of the regional towns and cities identified in the settlement hierarchy (Table 7.1). However, no reference is made to improving the accessibility of the regional centres. We consider this to be an anomaly that should be rectified.
- 7.38 Policy RT3 requires that in partnership projects, public and private sector elements should be commensurate with one another. We share AGMA's view that this would be difficult to enforce in practice, and are not persuaded that it is justified.

RECOMMENDATION

R7.7

Policy RT3 – Public Transport Framework

The following should replace the final two sentences in the second paragraph of Policy RT3:

“Local authorities and station operators should consider making additional provision for car parking at railway stations, so as to promote maximum use of the rail network.”

The first sentence of the third paragraph of Policy RT3 should be amended to read:

“Local authorities should introduce measures to enhance the accessibility of the regional centres and regional towns and cities identified in the settlement hierarchy (Table 7.1).”

The second sentence (beginning “Local authorities and operators...”) should be deleted from the fourth paragraph of Policy RT3.

Managing and Maintaining the Highway Network

- 7.39 Policy RT4 of the amended draft RSS defines the regional highway network by reference to Appendix RT2 in the submitted draft RSS (re-numbered Appendix 4.1 in the NWRA officers' suggested amendment). It consists of existing trunk roads, plus some non-trunk roads of regional importance. We consider it to be reasonably comprehensive and suggest no change.
- 7.40 The policy properly indicates that the best use should be made of existing infrastructure, and that proposals for major highway improvements should be made only after an examination of the practical alternative solutions. We accept that the alternatives should include the introduction of demand management measures. However, as demand management is now dealt with in Policy RT2, we consider that the reference to particular demand management measurements in the Manchester City Region in Policy RT4 is inappropriate, and should be deleted.
- 7.41 The suggested amended policy emphasises improving highway safety; reducing traffic growth; and mitigating the adverse environmental and health impacts of road transport, particularly in terms of air pollution, noise and loss of rural tranquillity. It enjoins highway authorities to adopt a consistent approach to traffic management. And it makes provision for the identification of strategic parking areas and rest sites for the drivers of commercial vehicles. We welcome these suggested changes, which address points made in a number of representations.
- 7.42 Paragraph 10.14 of the amended draft RSS indicates that route management plans should be prepared in accordance with NWRA guidance; and that maximum use should be made of recycled aggregates in road construction and maintenance schemes. We consider that these are statements of policy, and should be treated accordingly by inclusion in Policy RT4.

RECOMMENDATION

R7.8

Policy RT4 – Management of the Highway Network

The final sentence of the second paragraph of Policy RT4 should be deleted.

The first sentence of the fourth paragraph of Policy RT4 should be replaced with the following:

“Highway authorities should prepare Route Management Plans in accordance with NWRA guidance. Where a route is the responsibility of more than one highway authority, the relevant authorities should adopt a consistent approach to maintenance and management, including the adoption of appropriate speed limits by reference to the road’s function, standard and environmental context.”

The following should be added at the end of the fourth paragraph of Policy RT4:

“Maximum use should be made of secondary and recycled aggregates in road construction and maintenance schemes.”

Airports

- 7.43 Policy RT5 of the amended draft RSS deals with Airports. A number of representations expressed reservations about proposals to expand the capacity of the region’s airports, particularly in view of the propensity of aircraft to emit gases that affect climate change. However, our starting point was Government policy, as set out in the White Paper “The Future of Air Transport”. This concludes that, by 2030, Manchester Airport should be able to grow to accommodate up to 50 million passengers per annum (mppa); and Liverpool John Lennon Airport should be able to grow to accommodate up to 12 mppa. The White Paper also concludes that Blackpool Airport should be capable of developing the capacity to handle the level of traffic that it may attract; and that proposals should be brought forward for the development of Carlisle Airport to handle commercial flights. It was not within the remit of the EIP to examine these conclusions.

- 7.44 GONW and others considered that the RSS should define the roles of the region's airports, arguing that at present there was a degree of inconsistency in the way that they are treated in different parts of the document. It seems to us that the airports are necessarily gateways to and from the region, both for passengers and freight, and that they provide important interchange points in the transport system.
- 7.45 Policy RT5 refers to Manchester Airport and Liverpool John Lennon Airports as being "key economic drivers" for the North of England and the Liverpool City Region respectively. We consider the distinction between them to be justified, in view of the relative size of the two facilities and the amount of business they handle. We also consider that Manchester Airport plays an important national role in relieving pressure on the congested airports in the South East. The role of Blackpool Airport is very limited in comparison, although it is clearly an important feature in the local economy.
- 7.46 What is less clear is whether the North West's airports should provide locations for economic development. Plainly their expansion, as envisaged in the White Paper, will entail economic growth in its own right. Increased throughput of passengers and goods will create additional employment and value added, not only directly in aviation, but also in related sectors such as hotels, catering, retail, car hire and freight forwarding. We recognise that the development of Manchester Airport is likely to provide much needed employment and assist with the regeneration of Wythenshawe.
- 7.47 But in addition, the presence of an international airport is likely to attract investment by globally mobile businesses that are not functionally related to air transport. For instance, we were told that a number of major financial institutions have located in the Manchester and Liverpool City Regions, partly because of proximity to the airports. Policy MCR1 of the submitted draft RSS refers to improving the economic performance of the Manchester City Region, and encourages investment at various locations "including Manchester Airport, where the potential for growth is most favourable."
- 7.48 However, Manchester Airport is in a Green Belt area where a policy of restraint applies. We consider that the economic development that it generates, for purposes that are unrelated to aviation, should be subject to the locational criteria recommended in our proposed revision to Policy W2. The same applies in respect of the region's other airports. They should

not be identified as nodes for major economic growth in the RSS. We consider that the first part of paragraph 10.18 of the amended draft RSS should make this clear.

Development Control

- 7.49 Policy RT5 refers to proposals for the physical expansion of Manchester, Liverpool John Lennon and Blackpool Airports beyond their existing boundaries, for aviation related needs. For the avoidance of doubt, we consider that the boundaries of these airports (either as existing or as proposed) should be defined in local development documents. The policy lists certain criteria that should be taken into account. Although Policy RT5 states that these criteria should be considered “in turn”, it is not a sequential policy, and we understand these words to have been included in error.
- 7.50 One of the criteria refers to the scope for relocating operational activities and facilities off-site. We were provided with a schedule of operational aviation-related activities, which had been agreed between the Assembly, AGMA, Manchester CC, and the proprietors of Manchester and Liverpool John Lennon Airports. However, Macclesfield BC dissented from parts of the content of this list.
- 7.51 We share some of their concerns about the definition of operational development. For instance, hotels are included in the agreed schedule, but are explicitly excluded from the definition of an operational building for the purposes of Part 18 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1985 (the GPDO). Nevertheless, we consider it important that there should be hotel accommodation at major airports, especially to provide for passengers and aircrew in transit. The alternative of them having to travel elsewhere to find accommodation would not be consistent with the objective of reducing the need to travel. In any event, we consider that the criteria in Policy RT5 could and should be simplified, to avoid potential confusion. We propose their amendment.

Green Belt

- 7.52 The erection of structures for the purposes of an airport is not appropriate development within a Green Belt. So, unless such development is authorised by the GPDO, an applicant will have to demonstrate that there are very special reasons for granting planning permission. The Airport Master Plans (AMPs) produced

by the proprietors of the region's major airports suggest that growth along the lines envisaged in the Air Transport White Paper will entail airport expansion onto non-operational land within the Green Belt. The intention is that the AMPs should inform the preparation of development plan documents.

- 7.53 In preparing these, local planning authorities will have to consider whether such expansion is necessary, having regard to the criteria set out in Policy RT5 and any alternative form of development that may be possible. If they conclude that the proposed expansion is necessary, they will be in a difficult position. They will be unable to allocate the land in question as being suitable for airport development, since paragraph 3.3 of PPG2 states that policies in development plans should ensure that any planning applications for inappropriate development in the Green Belt would not accord with the plan. Conversely, if they failed to make provision for the airport expansion, they would be frustrating the clear intention of national air transport policy. Whatever course they followed, the matter would probably have to be resolved by an Inspector following a public inquiry, who would be confronted by the same dilemma.
- 7.54 Two possible solutions occurred to us. One would be to introduce a policy into the RSS to the effect that, in the North West, airport development would be regarded as appropriate development in the Green Belt, notwithstanding national policy as set out in PPG2. But we see little merit in this. While a departure from national policy may be justified in order to deal with some peculiar local circumstance, the problem that we have identified is unlikely to be unique to the North West. The other solution would be to make it explicit in the RSS that local planning authorities would be able to exclude land from the Green Belt, if they were satisfied that it would be needed for airport development as described in the White Paper. We asked GONW for guidance on this matter.
- 7.55 They suggested an amendment to Policy RDF5 of the draft RSS, which would provide for immediate (but limited) studies to assess the implications of proposed airport development for the Green Belt. The studies would be led by NWRA, working with relevant stakeholders. The outcome of the studies would be reflected in a future review of the RSS. If detailed Green Belt boundary changes were found to be necessary, these would then be put into effect through local development documents.

- 7.56 It would plainly take some time to undertake these studies, and subsequently review the RSS and adopt the relevant local development documents. We do not consider such a protracted process to be either necessary or entirely satisfactory. We cannot see why the relevant local planning authority should not be able to come to a view on whether local adjustments to a Green Belt boundary should be made to facilitate proposals in an AMP, that are made pursuant to the objectives of the Air Transport White Paper. Whatever the local planning authority decided, the matter would then be taken forward in a development plan document, which could be tested at a public inquiry as part of the normal process of scrutiny. We consider that the RSS should provide for such a solution, and have recommended that Policy RDF5 be amended accordingly. See Recommendation R4.13.

Surface Access

- 7.57 NWRA suggested an amendment to Policy RT5, to the effect that airport operators should implement surface access initiatives, which would make passengers and staff travelling to and from their airport less car dependent, and would ensure that local environmental standards are met. We support this.
- 7.58 Table 5.4 of the Technical Appendix to the draft RSS indicates that, in the long term, between 25% and 40% of passengers using Manchester Airport could travel to or from the airport by public transport. On a throughput of 50 mppa, this would equate to between 12.5 and 20 million public transport journeys per annum. Staff movements would add to the need for public transport capacity.
- 7.59 The proposed provision of a third platform at Manchester Airport Station would provide additional rail capacity there. But we understand that general improvements to bottlenecks in the Manchester Rail Hub will be needed in order to secure the maximum potential use of public transport for movements to and from the airport. We return to this later. The extension of the Metrolink to Manchester Airport would also contribute to this objective. We strongly support the priority given to this project in the draft RSS.
- 7.60 The capacity of road access to Manchester Airport would be substantially increased by the South East Manchester Multi-Modal Study (SEMMS) Relief Roads, which include bypasses to Stockport and Poynton, and a new Eastern Approach Road to the Airport. However, these schemes have yet to progress

through the relevant statutory procedures and are likely to be controversial.

- 7.61 At Liverpool John Lennon Airport, between 15% and 25% of passengers could travel to or from the terminal by public transport (equating to between 1.8 and 3.0 million public transport journeys per annum, to which staff movements should be added). Liverpool Parkway Station is linked to the airport by a shuttle bus service (which may be replaced by a light rapid transit in due course). We understand this arrangement to be successful. Together with bus services, it may be sufficient to meet the airport's immediate needs.
- 7.62 However, Table 5.4 of the Technical Appendix to the draft RSS indicates that a light rapid transit route between the airport and the city centre may also be necessary. We note that one of the proposed Merseytram lines was to have served this purpose, but has not been supported by the Government. An improved bus connection is being considered as an alternative. We consider this to be a disappointing outcome.
- 7.63 The proposal to re-open the Halton Curve would facilitate the introduction of a new rail service between West Cheshire/North East Wales and Liverpool Parkway and Lime Street Stations. This would improve access to Liverpool John Lennon Airport by public transport. Road access to the airport would be improved by the proposed Eastern Access Link Road.
- 7.64 Blackpool Airport is served by bus and rail. However, rail access is limited by single track working at Squire's Gate, and improvements would be needed to maximise the potential of public transport access.
- 7.65 We consider that parking policy should make a contribution to maximising the use of public transport for surface access to airports. Restrictions in the supply of parking space (both on- and off-airport) could help secure modal shift.
- 7.66 Paragraph 10.19 of the amended draft RSS states that airport operators should set themselves challenging targets for the proportion of journeys made to airports by sustainable modes (as well as environmental targets to reduce noise and atmospheric pollution). We consider that airport development should be contingent upon adherence to such targets, and that this principle should be incorporated in development plan policy.

RECOMMENDATION

R7.9

Policy RT5 – Airports

The following should be inserted after the first paragraph of Policy RT5:

“Airport operators should implement surface transport initiatives which ensure that access by public transport for both passengers and staff is continually enhanced to reduce car dependency and ensure that all local environmental standards are met.”

The third paragraph of Policy RT5 should be amended as follows:

“Airport boundaries, as existing or as proposed, should be shown in local development documents. In determining requirements for the expansion of an airport beyond its existing boundary, account should be taken of:

- **the scope for intensification and rationalisation of activities and facilities within the existing boundary;**
- **the scope for relocating existing activities or facilities off-site;**
- **the scope for developing proposed activities or facilities off-site.**

Plans and strategies for airports and adjacent areas should include measures to regulate the availability of car parking space for passengers and staff.

In considering applications for development at airports, account will be taken of:

- **the extent to which surface access and car parking arrangements encourage the use of public transport;**
- **the effect of the proposed development on noise and atmospheric pollution, and the extent to which this can be mitigated.”**

The first two sentences in paragraph 10.18 should read as follows:

“Airports generate employment, attract businesses to the area, open up markets and encourage tourism. However, regionally significant business development that is not required for the operation of an airport should be located in accordance with the criteria set out in Policy W2 above.”

Ports

- 7.67 Policy RT6 of the amended draft RSS deals with Ports. This topic did not give rise to much controversy in the representations, and we did not select it as a matter for detailed examination at the EiP. However, problems of surface access to ports were referred to by a number of participants at the EiP, and warrant consideration here.
- 7.68 We were told of traffic congestion on the approaches to the Port of Liverpool, particularly on the A5036T. We consider that proposed improvements to this route would help tackle congestion, improve access to a gateway of national importance, and reduce adverse environmental impacts. A scheme is within the Regional Funding Allocation (RFA) Programme, with a likely start date of 2015/16. It should be given a high priority.
- 7.69 We are keen that the maximum amount of freight should switch from road to rail. At present rail freight movements to and from the Port of Liverpool are hampered by loading gauge restrictions on the Bootle Branch Line. We consider that priority should be given to gauge enhancements to achieve W10 standard between Seaforth and the West Coast Main Line. We also consider that priority should be given to the re-instatement of the Olive Mount Chord, at the junction between the Bootle Branch and Chat Moss Lines. This would obviate the need for reversing movements, and facilitate the passage of freight trains serving the port.
- 7.70 Road access to the Port of Heysham is by means of an unsatisfactory route that passes through the urban area of Lancaster to provide a link to the M6, with adverse effects on congestion and amenity. The completion of a new link road is

included in the RFA Programme, but this has yet to pass through the requisite statutory procedures.

- 7.71 Road access between the Port of Fleetwood and the M55 is via the A585, which suffers significant congestion. However, proposed improvements to this route were not in the top quartile of schemes in the prioritisation carried out by either Atkins for the RFA bid, or by JMP Consulting during preparation of the RTS. We understand that there is little likelihood of progress during the RSS period. While we note the forceful representations that were made about this matter, on the evidence available to us we have no reason to question this prioritisation.

Freight Transport

- 7.72 Policy RT7 of the amended draft RSS deals with the management of freight transport. This topic was not the source of significant controversy, and we did not focus on it as a selected matter for discussion at the EiP. Nevertheless, one or two points were made during the course of the EiP which warrant comment.
- 7.73 First, NWRA suggested the insertion of a new clause into Policy RT7 to deal with the growth of air freight at the region's airports. We understand that this was omitted in error and agree that it should now be included.
- 7.74 Second, Policy RT7 begins by saying that plans and strategies should take account of the aims and objectives of the Regional Freight Strategy. It was put to us that the Regional Freight Strategy is a non-statutory document, which has not been subject to any process of public examination. Nevertheless, it is a significant piece of work produced by the Regional Freight Group, which includes GONW, the Assembly and NWDA. The draft RSS merely indicates that it should be taken into account in plans and strategies, not that it should be incorporated into the development plan. We consider this to be acceptable.

RECOMMENDATION

R7.10

Policy RT7 – Freight Transport

The following should be added at the end of Policy RT7:

“Local authorities should work with airport operators to facilitate the development of air freight at the region’s airports, in line with the White Paper ‘The Future of Air Transport’, particularly having regard to the need to minimise and mitigate environmental impacts (including night noise).”

Walking and Cycling

7.75 Policy RT8 of the amended draft RSS concerns walking and cycling. This topic did not give rise to significant controversy in the representations, and we did not select it as a matter for discussion at the EiP.

Priorities for Transport Investment and Management

7.76 Policy RT9 of the amended draft RSS deals with priorities for transport investment and management. In our view, these should reflect the general objectives of the RSS/RTS as set out above. We consider that the introduction of a more selective set of priorities as proposed in Policy RT9 would sow the seeds of confusion. For instance, the priorities listed in Policy RT9 make no reference to securing a shift toward more sustainable modes of transport; or reducing the adverse environmental impacts of transport; or improving access; or easing congestion. We consider these to be important factors, which should guide future investment decisions.

7.77 We have studied the alternative priorities suggested to us by AGMA. These are more detailed than those in the draft RSS; and they align more closely with our view of what the objectives of the RSS/RTS should be. However, on balance we consider that Policy RT9 should refer directly to the RSS/RTS objectives as a basis for prioritising investment decisions.

- 7.78 Policy RT9 also refers to the targeted investment priorities that are set out in Table 10.2 of the draft RSS. This consists of a list of transport schemes. It has five sections. Section (a) consists of committed schemes that are already in progress or are likely to start within the next year or so. It consists of national schemes, and schemes that are being financed through the Regional Funding Allocation (RFA).
- 7.79 Section (b) consists of 25 schemes which have been recommended for funding through the RFA during the 10 years up to 2015/16. Section (c) contains a further four contingency schemes that were identified in the RFA programme, but are unlikely to be funded before 2016 unless higher priority schemes drop out. The RFA allocation was informed by a prioritisation of transport schemes undertaken by the Atkins consultancy.
- 7.80 Section (d) of Table 10.2 reflects work undertaken by JMP Consulting to inform the RTS. These consultants prioritised a list of candidate transport schemes. Those falling in the top quartile of their prioritisation, and which do not appear in sections (a) to (c) of Table 10.2, are listed in section (d) as “first priority interventions.” A number of these are rail schemes, which are generally governed by separate funding arrangements outside the RFA. Section (e) consists of schemes in the second quartile of JMP Consulting’s priority list. These are described as “second priority interventions.”
- 7.81 A number of representations were made about the manner in which these priorities were determined, about the relative merits of the listed schemes, and about the omission of some schemes from the lists. However, it would not be appropriate for us to reassess the work of the consultants and the Assembly, or review the RFA. We do not have the evidence on which to evaluate the relative merits of a multitude of transport schemes; and we have no reason to believe that the consultants’ assessments were defective. We have understood and noted the arguments relating, for example, to the omission of the Ormskirk Bypass; to the relatively low priority given to the improvement of road access to Fleetwood; and to the lack of proposals that would result in significantly better connectivity for West Cumbria. However, we do not propose to recommend any change to the order of priorities shown, or to introduce new proposals.

- 7.82 We note that the criteria upon which the prioritisations were based were weighted in favour of economic (rather than social or environmental) factors. We were told that this had little effect on the outcome. Nevertheless, we consider that it ran counter to the principles of sustainable development. We consider it to be highly questionable that an economic criterion, such as “will the scheme improve the perceived image of the locality?” should have been given twice the weight of an environmental criterion, such as “will the scheme limit CO₂ emissions and support efforts to combat global warming?”
- 7.83 It was put to us that too many schemes are listed in Table 10.2. Most of those in section (e) are shown as being unlikely to start before 2021. We accept that some of these might not rely on the RFA for funding, and could be brought forward earlier. Possible alternative sources of funding may include the Transport Innovation Fund, private finance initiatives, and developer contributions. An example is the Middlewich Eastern Bypass, which is shown as being unlikely to start before 2021 if reliant on RFA finance, but which (we understand) will probably be completed much earlier than that, on the basis of developers’ financial contributions. We have some reservations about schemes that are unlikely to come to fruition within the period covered by the RSS/RTS being included in Table 10.2. But, on balance, we have decided against recommending changes on this ground.
- 7.84 The committed schemes and the schemes included in the RFA programme appear to have a bias towards highway proposals. However, we note that this apparent imbalance may be due to the absence of rail schemes from sections (a) to (c) of Table 10.2. Rail investment decisions fall outside the RFA. It is not clear how they will be influenced by the RSS/RTS. We consider that the RTS objectives should imply an increasing shift away from schemes that increase highway capacity, toward schemes that will secure increased use of the more sustainable modes of transport.
- 7.85 The distribution of development proposed in the draft RSS suggests that a high priority should be given to transport improvements in the Manchester and Liverpool City Regions. It is in these densely populated areas that we would expect demand management to be most effective in restraining car use, and the benefits of investment in public transport to be greatest. We note the limited priority afforded to improving the Manchester rail hub. We have already commented on the importance of easing congestion on the rail network in central

Manchester, so as to improve access to Manchester Airport. Even more importantly, it would improve rail performance generally in the City Region. We consider that it should be afforded priority.

- 7.86 The list of proposed rail interventions also includes the improvement of the Trans-Pennine Links between the Manchester City Region and Yorkshire, which is proposed for investigation; and the provision of a new high speed rail line to the South, which is currently being investigated. These would undoubtedly boost the regional economy.
- 7.87 We strongly support the proposals to extend Manchester's Metrolink system. Phase 3 will provide links from the city centre to the proposed employment site at Davenport Green and to Manchester Airport; to the proposed Kingsway Business Park and Rochdale; and to Ashton-under-Lyne via Sportcity.
- 7.88 We welcome the proposed introduction of quality bus corridors, for instance between Bolton, Bury and Rochdale; and between Leigh and Manchester. We also support the proposed improvements to public transport interchange facilities, for instance in Rochdale.
- 7.89 As to the Liverpool City Region, we have already commented on proposed rail access improvements to the port area at Seaforth, and to Liverpool Parkway and Lime Street Stations. We welcome the proposal to investigate improvements to Liverpool Lime Street and Central Stations.
- 7.90 The new Merseytram system is listed in Table 10.2(d) as a "first priority intervention." Two lines are being investigated. Line 1 would link the Liverpool Waterfront and City Centre to Kirkby. Line 2 would link the City Centre with Prescott and Whiston Hospital. We note that, for the time being, the Government have withdrawn funding for Merseytram. It is not for us to comment on that decision. However we consider that investment should be made to secure significant improvement to public transport provision in Liverpool, and that this should be an urgent priority. This will be imperative in view of the proposed concentration of new development in the city; and the need to reduce car use, so as to ease traffic congestion and combat global warming. The Government may wish to reconsider the potential role of a light rapid transit system in Liverpool.

- 7.91 We note that the proposed Merseytram line linking the City Centre and Liverpool John Lennon Airport appears to have been abandoned in the light of the Government's unfavourable decision on funding. Instead, consideration is now being given to an improved bus service.
- 7.92 Outside the Manchester and Liverpool conurbations, development is more diffuse and the scope for public transport improvement is less marked. In the Central Lancashire City Region, there are proposals to upgrade the tramway in Blackpool and Fleetwood. The extension of this system to serve Lytham St Annes, Poulton-Le-Fylde and Thornton are under investigation. There are also proposals for a new rapid transit public transport system in East Lancashire, to be introduced shortly.
- 7.93 We particularly welcome the proposal to investigate improved rail access between East Lancashire and the Manchester City Region. We note the potential for capacity to be increased by upgrading the single track sections on the Blackburn to Bolton line; and the possibility of reinstating the Todmorden curve, so as to provide for a rail service between Burnley and Manchester, via Rochdale. We were told that the demand for movement from, say, Burnley to the Manchester City Region, exceeds that between Burnley and Preston. This leads us to question the argument, advanced by some participants, that priority should be given to improving east-west connectivity through the Central Lancashire City Region. However, we support the proposal to investigate the potential for improving the rail link between the Central Lancashire and Leeds City Regions (listed as a "second priority intervention").
- 7.94 With the exception of proposed interchange facilities at Crewe, proposed transport investment outside the three City Regions is confined to highway schemes. We note that the West Cumbria Spatial Masterplan proposes improvements to track, stations and rolling stock on the Cumbrian Coastal Railway, but we have seen no details. This may be an appropriate matter to consider in a future review of the RSS.
- 7.95 Finally, we consider that the RSS would benefit from including a map or maps showing the locations of the proposed transport interventions listed in Table 10.2. We consider that this information would best be included on the sub-regional diagrams in Part 4 of the RSS.

RECOMMENDATION

R7.11

Policy RT9 – Priorities for Transport Management and Investment

Policy RT9 should be revised as follows:

“The general priorities for transport investment and management will be determined in accordance with the RSS/RTS objectives. Schemes for which funding has been allocated, and those that are under investigation or proposed for investigation, are listed in Table 10.2 and shown on the sub-regional diagrams in Part 4 of the RSS.”

CHAPTER 8 ENJOYING AND MANAGING THE NORTH WEST

Objectives

8.1 We have previously indicated that objectives should be incorporated at the beginning of each of the thematic chapters, rather than at the beginning of the RSS itself (see Chapter 2). In this case GONW put forward a set of proposed objectives in their Briefing Paper 2 (page 25) and we invited comments on these during the sessions on this part of the draft RSS. In fact virtually no comments were received. It was however suggested that a reference to the historic and built environment should be included as part of the first objective and we accept this point. We also suggest reversing the order of the opening section because of the importance which the use of resources assumed during the EiP. In point 4 we have omitted GONW's reference to "broad locations" because – as described later – these have not been identified. In the final bullet point we suggest the word "supplied" rather than "generated"; this is debated later in this chapter.

RECOMMENDATION

R8.1

We recommend that the following objectives should be adopted as the objectives for this part of the RSS and inserted after paragraph 11.1:

"The RSS is committed to using our natural and man-made resources actively, prudently and efficiently, as well as enhancing the Region's historic, built and natural environmental assets, and unique culture and heritage.

It seeks to:

- **Promote a more integrated approach to delivering a better environment through land and water management, including better relationship of new development to water resources, flood risk and adaptation to the impacts of climate change;**
- **Create multi-functional networks of green spaces;**

- **Produce a concise waste strategy that:**
 - **breaks the link between economic growth and the environmental impact of waste;**
 - **increases recycling rates in the Region;**
 - **provides a framework in which communities take responsibility for their own waste;**
 - **delivers a pattern of facilities of national regional and sub-regional importance including supporting policies.**
- **reduce energy demand and break the link between energy demand and economic growth;**
- **promote and exploit low carbon and renewable energy technologies and increase the amount of electricity from renewable sources supplied and consumed within the Region."**

Environment and Landscape

- 8.2 Policy EM1 of the draft RSS contained a suite of proposals under the heading of "Integrated Land Management". Sub-headings covered "biodiversity", "landscape and heritage" and "woodlands". Policy EM3 dealt with the related matter of Green Infrastructure.
- 8.3 Before dealing with the detail of these policies, there were two related general points raised in evidence and debate.
- 8.4 The first was that these were important policies; Policy EM1 replaced a number of policies in RPG13 with a single policy and some thought this might imply a lesser significance. It had already been argued during the EiP that the draft RSS as a whole under-played environmental issues, but it was important to the Region that they received priority; the North West's environmental assets were substantial and important.
- 8.5 We agree with the general point that environmental assets are important and must have their proper place in the RSS. This is hardly a difficult principle to support. There were no participants in the EiP who disagreed with it. We think – as some argued in the debate – that this should be reflected not just in Policies EM1 and EM3 but more widely in the RSS, and in our recommendations earlier in Policy DP1 we have already

suggested ways of strengthening this point at the very outset of the RSS.

- 8.6 The second point concerns the structure of Policies EM1 and EM3. Some suggested – reflecting the point above – that Policy EM1 should be split into a number of separate policies. This was not widely supported and we are not persuaded by it. We do not think that it adds to the strength of the policy. When we come to the detail below however we accept the proposal that Policy EM1 should be sub-divided into EM1A – EM1D. It was also suggested, but only by one participant (AGMA), that Policies EM1 and EM3 should be combined into a single policy. This was opposed by the Assembly and others. It is clear that the two are closely related but while we think that in practice the formulation does not make a great deal of difference, we do not recommend this change; if anything we think it more likely to cloud than to clarify the issues.

Policy EM1

- 8.7 We were the recipients of several attempts to re-write Policy EM1. A number of parties, in their representations and statements had suggested revisions to some or all of it. The Panel asked the Assembly, in advance of the debate on this issue, to consider all these proposals and to put forward a revised policy to the EiP. This they very helpfully did (EIP/NWRA/7).
- 8.8 This, however, prompted a further revision, which was proposed by a large group of parties (Cheshire CC, CPRE, Cumbria CC, Cumbria Wildlife Trust, English Heritage, Environment Agency (introduction and natural environment sections), Lancashire CC, National Trust, Natural England, North West Association of Civic Trust Societies, North West Environment Link, Wildlife Trust for Lancashire, Manchester and North Merseyside, and the Woodland Trust. (EIP/CCC/1)).
- 8.9 English Heritage (EH) and the National Trust (NT) put forward a separate paper (EIP/EH/1) dealing only with the historic environment; it contained the same policy proposed in EIP/CCC/1, but added a lengthy supporting text.
- 8.10 The debate at the EiP concentrated on EIP/CCC/1. There was widespread support for it – many participants had signed up to it, and others generally agreed with it. The Assembly indicated that, because there was a wide consensus in favour of it, they were prepared to support most of it.

- 8.11 We accept that, subject to the points below, this offers an improvement on the draft RSS. It provides a more comprehensive and user-friendly formulation, which is likely to give clearer guidance to the preparation of LDFs. We agree with the Assembly that policy needs to be concise, and we recognise that the proposal is somewhat longer than the original, but we think it is not excessive. The Assembly were also concerned that the RSS should not simply repeat national policy; for the most part we think that the revision avoids this trap.
- 8.12 There had also been some questions as to whether the original Policy EM1 was entirely compliant with paragraph 3 of PPS9. The Assembly argued that all the points were covered, if not in EM1 then elsewhere in the RSS. However, it was generally felt that the revision enhanced that compatibility.
- 8.13 The revised policy, as a result of its various alterations, now includes reference to a number of important new issues – including geodiversity, marine spatial planning, community forests and ancient woodlands which, in fact, add value.
- 8.14 We therefore support the revision in principle, but there are a number of further points to consider, the most important of which concerns part (C) of the policy on the historic environment. The EH/NT revision, found in EIP/EH/1 and incorporated into EIP/CCC/1, was a complete and very different re-write of this section of the policy and the Assembly were unable to support this proposed change.
- 8.15 The original policy included a list of what were seen as the main assets of the North West, and some policy to be applied to those assets, and more generally. The proposed revision, in contrast, consisted essentially of a list of processes and procedures which local authorities and others should follow.
- 8.16 Although there was a lot of support for the EH/NT alterations, the Panel have sympathy with the Assembly's view. The list in the revision is an excellent list; we accept the importance, for example, of the use of characterisation. But it is not North West specific. It is in our view closer to being a statement of good practice, than an RSS policy. We prefer the original NWRA's approach to this particular topic, with some amendments which the Assembly themselves suggested in EIP/NWRA/7 and two further additions.

- 8.17 The first arises from a proposal from the Lake District National Park Authority (LDNPA) which was raised at the EiP, and later set out in EIP/LDNP/1. We are happy to add "The Lake District cultural landscape" to the Assembly's list. The second arises from debate at various points during the EiP and refers to the importance of the historic Cities of Carlisle, Chester and Lancaster, which a number of parties wished the RSS to stress.
- 8.18 The EIP/CCC/1 revision included a reference to the Yorkshire Dales and Peak District National Parks, which are outside the North West RSS (though small parts of the Parks fall within the Region). We questioned this, but it was argued that there were areas inside the area covered by the RSS, which affected the setting of these National Parks, and that they should be included. We accept this view.
- 8.19 We also accept some other minor changes from LDNPA and MPU, and have made some minor alterations of our own, which we think add clarity, but do not change the sense of the policy. In particular we have modified the proposed wording of the penultimate point in Policy EM1 which we think could have placed unreasonable demands on local authorities as worded. We have added a reference to World Heritage sites, as suggested by LDNPA, but not to "realising their economic potential", which we think inappropriate in this policy. We do not think the reference to Tranquil Areas is appropriate because their definition is contentious and the policy open to wide interpretation; we have however referred to tranquillity in our suggested Policy DP7. In (D) we have suggested pruning the reference to veteran trees; this seems inappropriate at the regional level, important though the issue is. In some cases we have reverted to the wording in EIP/NWRA/7, and we have reinstated the word "should" rather than "will" in each section of the policy. This was a matter of debate at various stages of the process – to such an extent that NWRA had sought a legal opinion on the point (EIP/NWRA/11). This suggested inter alia, that:

where policy is directed towards the form of, or preparation of, future policy by local planning authorities and seeks to give guidance as to their preparation it seems appropriate to me that the word "should" is used. Where policy is directed towards development then it may be appropriate to use "will" or "must".

We think the policy falls into the first category.

8.20 In the light of all this:

RECOMMENDATION

R8.2

We recommend that Policy EM1 should be revised as follows:

“Policy EM1 –Integrated Enhancement and Protection of the Region’s Environmental Assets

The Region’s environmental assets should be identified, protected, enhanced and managed.

Plans, strategies, proposals and schemes should deliver an integrated approach to conserving and enhancing the landscape, natural environment, historic environment and woodlands of the region.

Plans and strategies should define spatial objectives and priorities for conservation, restoration and enhancement as appropriate, and provide area-based guidelines to direct decisions and target resources. These will be founded on a sound understanding of the diversity, distinctiveness, significance and sensitivity of the region’s environmental assets, and informed by sub-regional environmental frameworks. Special consideration will be given to the impacts of climate change and adaptation measures.

Priority should be given to conserving and enhancing areas, sites, features and species of international, national, regional and local landscape, natural environment and historic environment importance.

Where proposals and schemes affect the region’s landscape, natural or historic environment or woodland assets, prospective developers and/or local authorities should first seek to avoid loss of or damage to the assets, then seek to mitigate any unavoidable damage and where appropriate compensate for loss or damage through offsetting actions.

With regard to specific elements of this integrated approach, the following should be taken into account:

EM1 (A) Landscape

Plans, strategies, proposals and schemes should identify, protect, maintain and enhance natural, historic and other distinctive features that contribute to the character of landscapes and places within the North West.

They should be informed by and recognise the importance of:

- **Detailed landscape character assessments and strategies, which local authorities should produce, set in the context of the North West Joint Character Area Map. These will be used to identify priority areas for the maintenance, enhancement and/or restoration of that character and will under-pin and act as key components of criteria-based policies in LDFs;**
- **The special qualities of the environment associated with the nationally designated areas of the Lake District National Park, the Yorkshire Dales National Park, the Peak District National Park, the Forest of Bowland AONB, the Arnside and Silverdale AONB, the North Pennines AONB and Solway Coast AONB and their settings;**
- **The characteristics and setting of World Heritage Sites.**

EM1 (B) Natural Environment

Plans, strategies, proposals and schemes should seek to deliver a 'step-change' increase in the region's biodiversity resources by contributing to the delivery of national, regional and local biodiversity objectives and targets for maintaining, restoring and expanding habitats and species populations. This should be done through protecting, enhancing, expanding and linking areas for wildlife within and between the locations of highest biodiversity resources, including statutory and local wildlife sites, and encouraging the conservation and expansion of the ecological fabric elsewhere.

Broad locations where there are greatest opportunities for delivering the biodiversity targets are shown on the Indicative Biodiversity Resource and Opportunity Diagram (see Diagram 11.1). More specific locations will

be informed by sub-regional biodiversity maps and frameworks of statutory and local wildlife sites.

Local authorities should:

- **Develop a more detailed representation of this spatial information for use in their Local Development Frameworks; and**
- **Develop functional ecological frameworks that will address habitat fragmentation and species isolation, identifying and targeting opportunities for habitat expansion and re-connection. Active arrangements will be needed to address ecological cross-boundary issues within the region; and within areas such as the Pennines, Solway Firth, the River Dee Estuary and the Cheshire Meres and Mosses, as well as including biodiversity policies in any developing Marine Spatial Planning System in the Irish Sea.**

Plans, strategies, proposals and schemes should protect and enhance the region's geological and geomorphological resources including statutory and local sites by contributing to the delivery of national, regional and local geodiversity objectives and targets.

EM1 (C) Historic Environment

Plans, strategies, proposals and schemes should protect, conserve and enhance the historic environment supporting conservation-led regeneration in areas rich in historic interest, and in particular exploiting the regeneration potential of:

- **The maritime heritage of the North West coast including docks and waterspaces, and coastal resorts and piers;**
- **The Pennine textile mill-town heritage that exists in East Lancashire and Greater Manchester; and the textile mill-town heritage of East Cheshire;**
- **Victorian and Edwardian commercial developments in Liverpool and Manchester city centres;**
- **The traditional architecture of rural villages and market towns of Cumbria, Cheshire and Lancashire;**

- **The historic Cities of Carlisle, Chester and Lancaster; and**
- **The Lake District Cultural Landscape.**

EM1 (D) Trees, woodlands and forests

Plans, strategies, proposals and schemes should:

- **Support the aims and priorities of the North West Regional Forestry Framework and sub-regional forestry strategies;**
- **Encourage a steady targeted expansion of tree and woodland cover and promote sustainable management of existing woodland resources to enable the delivery of multiple benefits to society;**
- **Support the continued role of community forestry;**
- **Identify and protect ancient semi-natural woodland.”**

Supporting Text

8.21 Paragraph 11.3 of the draft RSS provided supporting text for the previous Policy EM1. It is commendably brief and we do not think it needs significant change.

8.22 In the previously mentioned EIP/EH/1 EH and the NT put forward a lengthy (two pages, seven paragraphs) draft supporting text for their proposed revision to that section of Policy EM1. We do not think it necessary or desirable to add this substantial text. Much of it is more suited to a Technical Appendix in our view; it lists the region's assets and discusses buildings at risk. It contains at paragraph 11.3 some useful thoughts on characterisation – if there were to be an addition to supporting text it might be this passage - but we feel that this can and should be promulgated elsewhere. We therefore recommend no change to the supporting text.

Policy EM3

8.23 Policy EM3 deals with Green Infrastructure. During the EIP the Panel were placed in some difficulty in dealing with this issue. A number of participants had combined to produce a lengthy proposed revision to the policy and supporting text.

Unfortunately this was not circulated in advance, and though it was raised in the debate, neither the Panel nor some of the other participants had seen it. It seemed to be a complex document and we indicated that we were not happy that the proposal had been produced so very late in the day; nearly twelve months had passed since the publication of the draft RSS and it seemed to us that producing a substantially revised policy on the day of the hearing was not an acceptable way to proceed.

- 8.24 The Panel were subsequently provided with a copy of the proposed policy (Ref EIP/NE/1), and we asked the participants in the debate to let us have their written comments on it following the EIP debate. This brought forward a somewhat mixed response. The National Trust, Lancashire CC, Cumbria CC, Cheshire CC and MPU all broadly supported the policy, though with varying degrees of enthusiasm (not much, in some cases – especially Cheshire CC and Lancashire CC). Each of them suggested detailed wording changes to it, along different lines. FoE and CPRE supported it (though CPRE, like many participants, felt that the proposed supporting text was far too long and detailed). EA broadly supported it but NWDA offered only qualified support. They particularly supported the final paragraph, which set out priorities around the City Regions, but opposed the middle section, which they felt was about delivery. GONW on the other hand – in a lukewarm response – particularly opposed the final section, which they felt was too vague in the absence of a more fully thought out approach at the regional level. AGMA opposed the whole of the proposed revised policy for a variety of reasons, essentially to do with what they saw as a lack of clarity and precision.
- 8.25 The Assembly were content to accept the policy but put forward a number of amendments to it.
- 8.26 The problem which the Panel faced is that we were in the middle of an evolving situation in the North West. Natural England said in their statement, “Green Infrastructure is a relatively new concept for which there is currently no national policy context...” Cheshire CC said “GI is very much a new concept that is still emerging; it is untested and for the large part has yet to be fully debated in the North West” Many others made very similar points.
- 8.27 This is not to dispute the importance of Green Infrastructure. It has great potential to act as part of an over-arching policy framework and to shape the pattern of development in a

significant way. But its development is at an early stage. The Panel had seen a draft Green Infrastructure Guide (SDL/NE/1), and in the statements this had been the subject of a great deal of support but also of much criticism. We understand that a second draft was produced just before the EiP debate, but we did not see it. However this illustrates that this is a developing situation and that as things stand, it is difficult to produce a definitive policy. It may be that, during GONW's consideration of our Report, more certainty will have developed.

- 8.28 We have considered whether to recommend the adoption of the revised policy. We think there is wide agreement about one point. The very lengthy supporting text which was proposed seems to us to be quite inappropriate as an insertion to RSS. We think it is premature until the Green Infrastructure Guide is finalised. Natural England themselves suggested it was "offered as a starting point", though we saw the EiP debate as being more in the nature of a culmination of a process rather than the beginning of one.
- 8.29 However, it was suggested by GONW that the definition of Green Infrastructure which is included in the Technical Appendix should be brought forward and included in to the supporting text. We agree with this.
- 8.30 Turning to the policy itself – we think the key to progress is the completion and agreement of the Green Infrastructure Guide. We think that will have a greater impact than any change to the wording of Policy EM3. Given that the proposed policy does not have unanimous support, and that we were unable to discuss it as fully as we would have liked at the EiP, we do not recommend that EM3 is altered. But if progress is made in the next few months, GONW may find it possible to revise the policy to take it into account. It is possible that EM3 could be made clearer at that stage, indicating more precisely how Green Infrastructure should be taken forward. In order to assist we include at Appendix A the Assembly's version of the proposed revision, which we think covers the GONW reservations and some of the other detailed points, and therefore represents the best option at the present time. We suggest one brief addition proposed by MPU about the need to put in place implementation plans. It is likely in a future review that this will be thought through much further and will achieve greater prominence as part of the over-arching framework (it is already mentioned in our proposed Policy DP6). The points made by AGMA in their response to the proposed policy will be useful in this context.

- 8.31 There was much debate about implementation, and the importance of partnership working. If the revised policy were adopted it would go some way to dealing with this issue. Several parties raised this in evidence and in debate, and the Assembly in paragraph 2.4 of their statement suggested that an informal partnership should be created either regionally or sub-regionally to champion the cause of green infrastructure. This is an important matter, and a clearer reference within the supporting text would be helpful in our view. CPRE (in EIP/CPRE/8) put forward a form of words which seemed to attract a good deal of support, including from GONW, and we recommend its inclusion (with some abbreviation – we do not think it necessary to refer to planning obligations, nor to Area Action Plans – which are part of the LDF in any event).

RECOMMENDATION

R8.3

We recommend:

- **That a short definition of Green Infrastructure, taken from the Technical Appendix, should be included in supporting text, as recommended by GONW (page 3 of their statement on Matter 6A).**
- **That in paragraph 11.5 of draft RSS an addition should be made to refer to the importance of partnership working. After the first sentence (“...biodiversity targets”) add:**

“local authorities should adopt a cross disciplinary approach to the identification of green infrastructure. There is a need for the planning system to work in tandem with bodies responsible for leisure, countryside and environmental management in order to deliver wider benefits. LDF policy should identify and protect existing green infrastructure and seek to deliver improvements where possible.”

Flood Risk

- 8.32 Policy EM5 of draft RSS is headed "Integrated Water Management". It deals in part with water supply and sewerage, and we consider this in the next section of the Report. The policy also deals with flood risk, which we discuss here. (There are also references to coastal flooding in Policy EM6, but we did not consider this at the EiP).
- 8.33 Once again we are in a policy area of rapid change. Two particularly important things had happened since the draft RSS was proposed.
- 8.34 Firstly, draft PPS25 was produced shortly before the draft RSS was published, and too late to be fully incorporated. The final version of PPS25 was published during the EiP (though the Companion Guide was not available at that time).
- 8.35 Secondly, the EA had published a "Flood Risk Ranking for the North West" (SDL/EA/02). This was generally seen as a valuable first step towards the production of the Regional Flood Risk Appraisal (RFRA), which is required by PPS25. However the EA document covers only tidal and fluvial flooding and does not deal, for example, with ground water and sewerage flooding. It was not sufficiently advanced to form the basis of a revision to RSS policies. The fact is that an RFRA has not been produced, in the absence both of full guidance and of data on all forms of flooding.
- 8.36 During the EiP the Assembly indicated that they expected to be able to complete the RFRA process by the time RSS is published. GONW expressed the hope that it – or at least an equivalent document which covered most of the same ground – could be produced more quickly than that.
- 8.37 Obviously this is a key step and, of course, it is desirable for the RFRA to be in place as soon as possible. The Panel are content with the assurance that it will be in place by the time the RSS is published; as will be seen later the policy revision which we recommend rests on that assumption. Should NWRA fail to complete this work GONW will have to alter the policy accordingly.
- 8.38 A key question which the Panel raised was whether or not there was anything in the evidence on flood risk which might pose a threat to any of the proposals in the draft RSS – such as the currently proposed broad locations for housing or employment,

or for transport infrastructure. The answer to the question was that there was no such evidence, and no need to alter RSS proposals to take account of flooding. Of course, RSS is not site specific and at LDF level conflicts may arise in relation to particular allocations and proposals. It was stressed that it was important for local authorities to consider flood risk at an early stage.

- 8.39 We were reassured by this clear statement. We heard of examples of cooperative working at a site-specific level, for example in Salford, which were encouraging. Now that PPS25 is in place, and the RFRA in prospect we believe the North West is on the right track to deal with this increasingly important issue.
- 8.40 The EA, at the request of the Panel, produced a Briefing Paper (EIP/EA/1) which, while dealing primarily with the water and sewerage infrastructure, also touched on flood risk. Importantly, Annex 1 of that paper suggested a complete revision of Policy EM5 which covered all these issues.
- 8.41 The flood risk part of this revision found general favour. One amendment was proposed, which most parties accepted and we support. This was to replace the words "... which steer development away from areas at risk of flooding" to "... which comply with the sequential test in PPS 25." We think this is a more precise wording, less open to interpretation and more clearly in tune with national policy.
- 8.42 We recommend that, with this revision, the EA's revisions to Policy EM5, as they affect flood risk, should be accepted. We set out the full revised policy at the end of the next section on water and sewerage.
- 8.43 There is one other point to make. The Assembly had produced a short briefing note (Briefing Paper 4) on Development and Flood Risk, and this included a very useful map showing the relationship between the main proposed development locations in draft RSS and EA information on Flood Zones 3 and 2. There were calls for this to be included in RSS and we agree that this would be valuable, though it may need some amendment in the light of recommendations earlier in our Report.

RECOMMENDATION

R8.4

We recommend that the map attached to NWRA Briefing Paper 4, amended as necessary, should be included in the final version of RSS.

- 8.44 We think that only minor changes are needed to the supporting text; but paragraph 11.10 might be briefly expanded to refer to the key elements of PPS25.

Water and Sewerage

- 8.45 Policy EM5 of the draft RSS deals with water and sewerage (as well as flood risk) and this proved to be an important issue during the EiP, though one which we believe was satisfactorily resolved thanks to some valuable work by the EA and others in advance of the debate on the topic. The paper which we mentioned earlier (EIP/EA/1) is crucial in this respect.
- 8.46 The water company which covers almost the whole of the North West is United Utilities. We heard earlier in the EiP that their plans had been based on the housing figures in RPG13 and that there were questions as to whether the increased needs which would ensue if the Panel and the Secretary of State endorsed the higher figures in the draft RSS could be met. Their assumptions were explored during the EiP – including such issues as increasing efficiency, decreasing leakage, new sources of supply etc; it was clear that these factors had been taken into account.
- 8.47 This question – whether the need could be met - was clearly a critical point and it led the Panel to ask for the paper which became EIP/EA/1. The basic conclusion was reassuring. We quote from paragraph 2.3:

...our position is that it should be possible to accommodate the proposed growth, provided there are strong policies in RSS to provide an effective and co-ordinated strategic framework. This must facilitate increased building standards and ensure growth is planned where infrastructure capacity exists or can be delivered in time to serve the development.

- 8.48 As already indicated, EA proposed a policy formulation – a completely revised Policy EM5 - which covered the need for consultation with the water company and EA when planning development (which we completely accept). It also covered the need to put in place economy measures (which we discuss further below). And it covered the need to plan growth “within areas of greatest headroom first”.
- 8.49 This last point proved controversial. Firstly it was argued by a number of parties that – while the importance of the issue was not in doubt – such a policy could have perverse effects. It may lead to sites which were less sustainable, according to other planning criteria, being developed first. It might inhibit the development of brownfield land. Development should not be led just by the existence of spare capacity – there were wider strategic issues to consider.
- 8.50 It was also argued that it was often possible for developers to provide mitigation measures where necessary and that provision should be made in the policy or text for this to occur.
- 8.51 There was some suggestion during the debate (from GONW in particular) that what was being proposed was a form of “sequential test” where areas of spare capacity were preferred before other areas. We reject this notion. This is not a sequential test. It is a very important issue which must be taken into account in planning development but not more than that. It will of course be at the local level that it bites – RSS once again lacking site specificity – and good consultation arrangements are vital, as we have said. But it would be wrong for the provision of water and sewerage to become the primary consideration, above all others; the EA policy did not quite say that, but it could be implied from their wording and we suggest a revised formulation below.
- 8.52 The EiP also debated the question of the Code for Sustainable Homes, to which reference had been made in the EA draft. During the EiP the Government’s new Code for Sustainable Homes, and “Building a Greener Future”, were issued, and to some extent these overtake the proposed policy. It was also noted that there were likely to be references to the Code elsewhere and there was no need to repeat them here; but the issue in any event went wider than residential development and measures were needed to deal with commercial development too. We suggest below some wording to deal with this point, and propose to omit the reference to the Code at this point.

- 8.53 In the light of these discussions, and with some minor wording changes which arose from the debate or which we believe are necessary to clarify the policy, we have re-worked the EA proposal. It also takes account of the changes on flood risk which we discussed earlier.

RECOMMENDATION

R8.5

We recommend that Policy EM5 is amended as follows:

“In achieving integrated water management and delivery of the EU Water Framework Directive, plans and strategies should have regard to River Basin Management Plans, Water Company Asset Management Plans, Catchment Flood Management Plans, and the Regional Flood Risk Appraisal. Local planning authorities and developers should protect the quantity and quality of surface, ground and coastal waters, and manage flood risk, by:

- **Working with the Water Companies and the Environment Agency when planning the location and phasing of development. Development should be located where there is spare capacity in the existing water supply and waste water treatment, sewer and strategic surface water mains capacity, insofar as this would be consistent with other planning objectives. Where this is not possible development must be phased so that new infrastructure capacity can be provided without environmental harm;**
- **Producing sub-regional or district level strategic flood risk assessments, guided by the Regional Flood Risk Appraisal. Allocations of land for development should comply with the sequential test in PPS25. Departures from this should only be proposed in exceptional cases where suitable land at lower risk of flooding is not available and the benefits of development outweigh the risks from flooding;**
- **Designing appropriate mitigation measures into the scheme, for any development which, exceptionally, must take place in current or future flood risk areas, to ensure it is protected to appropriate standards, provides suitable emergency access under flood**

conditions, and does not increase the risk of flooding elsewhere;

- **Requiring new development, including residential, commercial and transport development, to incorporate sustainable drainage systems and water conservation and efficiency measures to the highest contemporary standard;**
- **Encouraging retrofitting of sustainable drainage systems and water efficiency within existing developments;**
- **Raising people’s awareness of flood risks and the impacts of their behaviours and lifestyles on water consumption.”**

8.54 United Utilities argued for the inclusion of a policy on the treatment, recycling and disposal of wastewater sludge (see page 4 of their statement) but this did not find support. The Assembly argued that further work was needed on this topic and that it was an issue which should be covered in a future review. The Panel are content to accept this argument. The matter – which overlaps of course with our discussion on waste – is nonetheless an important one and should be pursued vigorously.

Supporting text

8.55 The supporting text to Policy EM5 is again commendably brief and we do not think major change is needed.

MINERAL EXTRACTION

Peat

8.56 Policy EM7 of the draft RSS indicates that plans and strategies should make provision for a supply of minerals to meet the requirements of national planning guidance. The Policy refers to the need to take account of the national significance of the Region’s reserves of various resources, including peat. In view of the substantial number of objections that were made to this, we selected peat extraction as a matter for consideration at the EiP.

- 8.57 The Royal Society for the Protection of Birds argued that the reference to peat should be deleted from Policy EM7. They indicated that peat bogs are a priority habitat because of the biodiversity they support. They are also an important carbon sink, the disturbance of which would contribute to climate change. Consequently, it would be necessary to find alternatives to peat as a growing medium. The target in MPG13, that 40% of the materials in growing media and soil improvers should be non-peat, has now been met. The UK Biodiversity Action Plan for Lowland Raised Bogs has introduced a new target that 90% of these materials should be peat free by 2010. The RSS should champion the conservation of the Region's peatlands, and encourage the development of alternatives to peat.
- 8.58 The Growing Media Association explained that it would be difficult to meet the 90% target set in the Biodiversity Action Plan. An embargo on peat extraction would put UK producers at a disadvantage against foreign competitors. Extant planning permissions for peat working in the North West would not expire until 2042. These would be sufficient to meet the expected needs of the industry up to that time.
- 8.59 We note that MPG13 indicates that "future peat extraction should be limited to areas which have already been significantly damaged by recent human activity." In view of this, and the availability of permitted reserves, we do not think it likely that there will be significant pressure to obtain planning permission to exploit additional peat resources during the currency of the RSS. There is clearly time in which to develop substitute materials.
- 8.60 We consider that, in so far as it refers to peat, Policy EM7 is consistent with national policy. We are aware of no circumstances that would justify a departure from national policy in respect of this issue. Accordingly, we do not support the deletion of the reference to peat from Policy EM7.
- 8.61 Otherwise, there were few representations relating to that part of the draft RSS that deals with minerals. We did not select any other topics in this area as matters for discussion at the EiP.

WASTE

Regional Approach

- 8.62 Policy EM10 of the draft RSS sets out a regional approach to waste management. This requires that plans and strategies should include provisions “to deliver the ... targets of the Regional Waste Strategy” (RWS). However, a footnote indicates that some local authorities have already set targets that exceed those given in the RWS, “...whilst others may set lower targets to reflect their local situation.”
- 8.63 Some participants thought that the RWS targets should be made explicit in the RSS. Some thought them insufficiently ambitious. Others questioned whether they should be referred to at all, particularly as they are more challenging than the corresponding national targets. However, we consider that the region should aspire to meet the targets that it has already set itself, and that these should be set out in the RSS. Nevertheless, as the footnote indicates, the regional targets are just that. The objective should be to achieve them across the region as a whole, though it may not be possible to deliver them in every waste planning authority area. We consider that this should be reflected in the wording of Policy EM10. The footnote is not very obvious. We consider that its text should replace the final sentence of paragraph 11.19 of the RSS, which confusingly refers to the targets as being “mandatory”.

RECOMMENDATION

R8.6

Policy EM10 – Approach to Waste Management

The second paragraph of Policy EM10 should be amended as follows:

“Plans and strategies should reflect the principles set out in the National Waste Strategy and PPS10. Where practicable, they should seek to achieve the following Regional Waste Strategy targets:

- **growth in municipal waste to be reduced to zero by 2014;**
- **35% of household waste to be recycled or composted by 2010; 45% by 2015; and 55% by 2020;**

- **value to be recovered from 45% of municipal solid waste by 2010 (including recycling/composting); and 67% by 2015;**
- **zero future growth in commercial and industrial wastes;**
- **recycle 35% of all commercial and industrial wastes by 2020;**
- **value to be recovered from at least 70% of commercial and industrial wastes by 2020 (including recycling/composting)."**

The final sentence of paragraph 11.19 of the draft RSS should be replaced by footnote 158 of the draft RSS.

Waste Management Principles

8.64 Policy EM11 refers to the waste management hierarchy. A number of participants argued that it should be more explicit in promoting waste minimisation, and in seeking to secure the management of waste at the highest possible level in the hierarchy. In order to do this, we consider that it should incorporate material contained in paragraph 11.21 of the supporting text, along the lines suggested by GONW and others.

RECOMMENDATION

R8.7

Policy EM11 should be amended to read as follows:

"Every effort should be made to minimise waste, maximise re-use, and maximise opportunities for the use of recycled material. Such residual waste as does arise should be managed at the highest practicable level in the Government's waste hierarchy. The following sequence of initiatives should be followed, and appropriate facilities provided:

- **first, waste minimisation and re-use; then**
- **composting or recycling (for instance through streamed "kerbside" collections, "bring" banks, civic amenity sites, and centralised recycling facilities); then**

- **intermediate treatment of wastes that cannot readily be composted or recycled (through anaerobic digestion or mechanical biological treatment (MBT)); or**
- **treatment to deal with hazardous materials; then**
- **production of refuse derived fuels from waste; then**
- **recovery of energy from residual waste and refuse derived fuels (by a range of thermal treatments); and finally**
- **disposal of residual wastes by land-filling (or land-raising), including the recovery of energy from landfill gas where practicable.”**

Paragraph 11.21 of the draft RSS should be deleted.

- 8.65 Although GONW argued that paragraph 11.22 of the draft RSS should also be deleted, it seems to us to provide guidance on how the waste management principles might be applied to development and regeneration schemes, through planning control. We consider that it should be retained.
- 8.66 Policy EM12 of the draft RSS applies two additional principles to the management of waste in the North West. These are the “self sufficiency principle”, which argues that the region (and each sub-region) should rely on its own waste management capacity, rather than export waste elsewhere; and the “proximity principle”, which requires that facilities for the treatment and disposal of waste should be sited as close to the source of the waste as possible.
- 8.67 However, a number of participants pointed out that these principles have been omitted from PPS10. Instead, this says that planning strategies should “provide a framework in which communities take more responsibility for their own waste”; and “enable waste to be disposed of in one of the nearest installations”. We consider that the wording of RSS policy should be consistent with this guidance. We also consider that sustainable transport modes should be used for unavoidable waste movements wherever practicable. We have adopted, with modification, wording suggested to us by Peel Holdings.

RECOMMENDATION

R8.8

Policy EM12 should be headed “Locational Principles” and should read as follows:

“Waste planning and disposal authorities should provide for communities to take more responsibility for their own waste. Municipal, commercial and industrial waste should be treated, and any final residue disposed of, in one of the nearest installations to its source. Local authorities should ensure that waste management facilities are sited in such a way as to avoid the unnecessary carriage of waste over long distances. In considering the location of new waste management facilities, they should take account of the availability of transport infrastructure that will support the sustainable movement of waste, seeking when practicable to use rail or water transport. They should also take account of the environmental impact of the proposed development.”

Provision of Waste Management Facilities

- 8.68 Policy EM13 of the draft RSS is concerned with the provision of waste management facilities. It proceeds by reference to three tables, which are incorrectly numbered in the policy. Table 11.3 deals with commercial and industrial waste; Table 11.4 deals with hazardous waste; and Table 11.5 deals with municipal waste.
- 8.69 Although paragraph 6 of PPS10 indicates that the RSS should look forward for a 15 to 20 year period, Policy EM13 and the supporting Tables cover only the period to 2020. By the time the RSS is finalised, they may have little more than 12 years to run. We consider that an early review would provide the best means of rectifying this.
- 8.70 The final paragraph of Policy EM13 provides that, where appropriate, “waste planning, disposal and collection authorities should work together to produce joint local development documents and waste management strategies in partnership with the Environment Agency, the waste management industry, NWRA and other stakeholders.” This seems to misunderstand that legal responsibility for the production of local development

documents rests solely with planning authorities. While the co-operation of other agencies should be encouraged, they cannot be partners in the production of development plan documents. We consider that the reference to Local Development Documents in the final paragraph of Policy EM13 should be deleted.

Apportionment

- 8.71 Paragraph 9 of PPS10 indicates that “the tonnages of waste requiring management should be apportioned by waste planning authority area, or to sub-regions comprising more than one waste planning authority where waste planning authorities have indicated through their local development schemes that they intend to work jointly on development plan documents.” Tables 11.3 and 11.5 of the draft RSS show waste arisings for six sub-regions (i.e. Cheshire; Cumbria; Lancashire (including Blackpool, and Blackburn with Darwen); Greater Manchester; Merseyside; and Warrington and Halton). With the exception of Warrington and Halton, the waste planning authorities in each of these areas intend to produce joint waste development plan documents. We understand that Halton will now be co-operating with the five Merseyside authorities for this purpose, and that Warrington will proceed alone. We consider that the distribution of waste arisings in the RSS should be adjusted accordingly, by adding Halton’s share to the Merseyside totals and separating Warrington.
- 8.72 The distribution between sub-regions shown in Tables 11.3 and 11.5 of the draft RSS does not take account of the movement of waste between regions or sub-regions to exploit the availability of waste management facilities. We consider this to be a weakness that should be rectified at the earliest opportunity. Although net self-sufficiency in waste management is desirable, it may not always be readily attainable. Urban areas with few opportunities for landfill may necessarily have to rely on neighbouring areas for the final disposal of their residual waste. We understand that this problem is likely to be particularly acute in Merseyside, where the constraint on landfilling resulting from urban development is compounded by the presence of an extensive aquifer.
- 8.73 Paragraph 11.33 of the draft RSS provides that if urban authorities are unlikely to meet the requirement for the development of landfill facilities, they will need to accommodate more treatment capacity than would otherwise be planned for. That seems reasonable. However, notwithstanding the

requirement that communities should take more responsibility for their own waste, it might be wise to plan for a continuing net movement of waste from Merseyside, (and possibly Greater Manchester) into the surrounding areas. Lancashire County Council argued that where facilities were to be provided to meet sub-regional or regional needs, this should be done only with the agreement of the recipient authority. However, our view is that NWRA should plan for any development required to meet needs of this sort. While local interests should be taken into account, they should not be determinative. This aspect of apportionment should be considered in an early review of the RSS.

- 8.74 The Assembly suggested that the heading “Future Capacity Requirements for Waste Management Facilities”, which appears above paragraph 11.36 in the draft RSS, should be replaced by the word “Apportionments”. However, we do not consider that this would be helpful, since the subsequent text does not deal specifically with apportionment.

Commercial and Industrial Waste

- 8.75 The Assembly suggested that the title of Table 11.3 should be amended to refer to the indicative capacity of “non-hazardous” commercial and industrial arisings. We agree with this.
- 8.76 The Assembly accepted that the evidence base for this table was unsatisfactory. They have commissioned a fresh survey of commercial and industrial waste, which will improve the position. However, the results of this were not available during the EiP. Table 11.3 is based on the existing situation. We accept that the precise size and mix of facilities needed to deal with future commercial and industrial waste arisings is uncertain. It may be largely determined by economic factors, such as the landfill tax escalator, which should provide firms with an incentive to reduce waste, and to adopt waste management measures at higher levels in the waste hierarchy.
- 8.77 Although there are shortcomings in the data on commercial and industrial waste in the draft RSS, we do not consider that this should delay the issue of the final document. In reaching this conclusion, we have taken account of the fact that the data in the draft RSS are the best currently available; that information about existing waste streams is unlikely ever to be 100% accurate; and that there must inevitably be wide margins of error in estimating future waste arisings. Doubtless better data will inform waste policy in an early review of the RSS.

- 8.78 Table 11.3 gives the indicative capacities of various forms of treatment of commercial and industrial waste that will be required up to 2020. A number of participants questioned the zero value given for composting. Some pointed out that a proportion of the North West's commercial and industrial waste is already composted, and that this should be expected to grow as waste treatment moves up the hierarchy. We agree. For instance, a significant proportion of the waste generated by catering, food-processing or convenience retail businesses must be suitable for composting, if it cannot be used as animal feed. This should be encouraged.
- 8.79 Lancashire CC suggested that Table 11.3 should be reduced to two columns, respectively showing the required capacity for the treatment of commercial and industrial wastes (including composting, recycling and energy recovery) and the required capacity for final disposal by landfilling. This would enable waste planning and disposal authorities to decide upon the most appropriate mix of treatment facilities in their areas (including composting); and would give them the freedom to push waste treatment as far up the hierarchy as possible, without setting any specific figure for thermal treatment. The landfill figure should be set as low as possible, to reflect the financial pressure on commerce and industry to reduce the amount of waste sent to landfill. We support this proposal.
- 8.80 The Assembly suggested that paragraph 11.36 of the draft RSS should be amended, to refer to the quantities of commercial, industrial, construction and demolition waste that are currently produced in the region. The amendment would also explain that the practice of sending much of this material to landfill could be changed, through increased re-use, recycling, composting or energy recovery; that this would be driven by legislative requirements, and by the increasing costs of landfill disposal; and that there would be a need to provide additional treatment capacity across the region. We consider the proposed amendment to have merit.

RECOMMENDATION

R8.9

Table 11.3 – Commercial and Industrial Waste

The title should be amended to “Indicative Annual Capacity of Non-Hazardous Commercial and Industrial Waste Arisings to 2020.”

Figures for Halton should be added to those for Merseyside, and separate figures should be shown for Warrington.

The table should be reduced to two columns, showing respectively the indicative total waste treatment capacity and the landfill requirement for each sub-region.

Paragraph 11.36 of the draft RSS should be amended as shown in NWRA’s Briefing Paper 20.

Hazardous Waste

- 8.81 The Assembly recognised that significant uncertainties beset planning for the future management of hazardous waste. Key issues include changes to the classification of hazardous wastes, and the prohibition of the co-disposal of hazardous and non-hazardous waste streams. Table 11.4 is based on the old definition of special waste, and is likely to underestimate the required capacity. The Assembly suggested that the data in this table should be amended to show the quantity managed in 2004. As this appears to be the most up-to-date information available, we agree. The reclassification of hazardous waste should be reflected in a future review of RSS.

RECOMMENDATION

R8.10

Table 11.4 – Hazardous Waste

Table 11.4 should be amended as shown in NWRA’s Briefing Paper 20.

Municipal Waste

- 8.82 Table 11.5 of the draft RSS gives the indicative requirements for municipal waste arisings between 2005 and 2020, for the same sub-regions as are used in Table 11.3. Separate data are given for the required annual capacity of composting facilities; material recovery facilities; residual waste treatment facilities (including mechanical/biological treatment, the production of refuse derived fuels, and the delivery of energy from waste); and landfill for the disposal of residual wastes. This information is presented in three 5-year time bands. A particular difficulty in the presentation of the data arises from the fact that some waste may be subject to a number of different treatment processes.
- 8.83 The Assembly suggested that Table 11.5 should be amended to provide the most up-to-date information available. A number of errors in the amendment originally proposed in their Briefing Paper 20 were subsequently corrected, in document EIP/NWRA/9. The amended table includes additional data on the current total capacity for each treatment method.
- 8.84 A number of participants were concerned at the complexity of this table, and considered that the derivation of the data was inadequately explained. Waste disposal authorities stressed that their Municipal Waste Management Strategies set out the manner in which they intended to deal with municipal waste, and that it might prove difficult for them to provide the indicative mix of treatment capacities proposed by the Assembly. They were already working towards the critical dates set out in the Landfill Allowance Trading Scheme, which would significantly reduce their ability to dispose of municipal waste to landfill. The first threshold would be in 2010. An even more rigorous regime would begin in 2013. Unless alternative waste management capacity was in place by these dates, the authorities would incur considerable financial penalties. They could not afford to change programmes that were already in an advanced state of development.
- 8.85 Conversely, there was support for Table 11.5 from representatives of the waste management industry. They considered it desirable that the RSS should quantify the need for various waste management facilities, so that the capacity gap could be identified. This would provide some certainty in planning investment in new waste treatment plant.

- 8.86 We recognise this. But we are also sympathetic to the position of the local authorities. Ultimately, it will be for them to decide on the appropriate capacity and mix of treatment facilities that can be accommodated in their areas, having regard to the scale of the requirement; the need to push waste management up the hierarchy; the opportunities available; and environmental impacts.
- 8.87 We do not consider that indicative figures for the various methods of treating municipal waste should be retained in the RSS. The objective should be to move waste management up the hierarchy as far as possible. As with commercial and industrial waste, we consider that the table should be reduced to show the predicted municipal waste arisings to be dealt with in each sub-region, and the likely landfill capacity required to deal with residual wastes. Once again, the figures for Halton and Warrington should be broken down, with Halton's added to the Merseyside totals, and Warrington's presented separately.
- 8.88 The Assembly suggested the addition of a new table to the RSS (Table 5a). This purports to show the current capacity for municipal waste management by sub-region. While it contains some data for composting, the remainder of the table consists mostly of zeros. The proposed supporting text explains that no data is available for purpose built recycling facilities. We do not consider the table to be particularly helpful; and we do not recommend its inclusion in the RSS.
- 8.89 The Assembly also suggested that text should be added to paragraph 11.38 of the draft RSS. In addition to referring to anaerobic digestion and related processes, an additional sentence would indicate that new primary treatment capacity for municipal waste should be located in the waste planning authority area in which the waste arises. We consider this to be reasonable. However, we can see no reason for the deletion of the first two sentences of paragraph 11.38 in the draft RSS, as appears to be implied in the Assembly's suggestion.

RECOMMENDATION

R8.11

Table 11.5 should be amended as shown in document EIP/NWRA/9, and should be simplified to show only total predicted municipal waste arisings, and residual landfill capacity requirements for each sub-region.

Figures for Halton should be added to those for Merseyside, and separate figures should be shown for Warrington.

Additional text should be added to paragraph 11.38 of the draft RSS as shown in NWRA's Briefing Paper 20.

Construction and Demolition Waste

- 8.90 The Environment Agency and others considered that construction and demolition waste should be identified as a separate waste stream in the RSS. On the other hand, representatives of the waste planning authorities argued that the management of this waste was not a strategic regional issue, but was a matter to be dealt with in local development documents.
- 8.91 It seems to us that PPS10 is unclear on this point. At paragraph 7 it indicates that RSS should take account of management needs arising from the recycling of construction and demolition waste. However, in paragraph 8, it indicates that RSS should identify the tonnage of commercial, industrial and municipal waste requiring management, but makes no reference to construction and demolition waste. We recognise that a substantial proportion of construction and demolition waste is likely to be re-used in building or engineering works. Nevertheless, a significant amount may require treatment or disposal. Ideally, the RSS should provide details of the expected tonnage of waste from all sources requiring management.
- 8.92 As far as we know, there are no reliable data available on likely future construction and demolition waste arisings. In view of the significant increase in the amount of development, redevelopment and regeneration proposed in the RSS, these could be considerable. We do not think it necessary to delay

progress with the RSS whilst the necessary information is acquired; but we do consider that this matter should be taken into account in the next review.

Pattern of Facilities

- 8.93 The Assembly suggested that the sub-title "Pattern of Facilities" should be inserted immediately before paragraph 11.27 of the draft RSS; and that the second sentence in paragraphs 11.27 should be amended to make it clear that almost all the primary treatment capacity needed to deal with municipal waste would be new, showing the scale of the capacity gap. We agree with their suggestion. However, we can see no case for the deletion of the third and fourth sentences in paragraph 11.27, as is implied in NWRA's Briefing Paper 20.
- 8.94 The Assembly also proposed the replacement of paragraph 11.28 of the draft RSS with new text. Again, we can see no case for the deletion of the existing text in this paragraph as is implied in NWRA's Briefing Paper 20. The new text would indicate that, in the southern part of the region (including Greater Manchester and Merseyside) strategic waste management facilities could be located in a number of locations. It is plain that the nearest installation to deal with waste originating in the conurbations might be located in any one of the five sub-regions to be identified in Tables 11.3 and 11.5 (i.e. Cheshire, Greater Manchester, Warrington, Merseyside (including Halton) or Lancashire). There are no clear criteria for identifying the broad locations for waste treatment facilities within these sub-regions. Much would presumably depend on the distribution of waste sources, transport routes, the availability of sites, and the environmental impact of the proposed facility. We consider that this should be covered by Policy EM13. We have largely adopted wording suggested to us by Peel Holdings.
- 8.95 Paragraph 12 of PPS10 indicates that the RSS should identify the broad locations where the pattern of waste management facilities should be accommodated. In doing so, it should take account of waste management requirements arising from multiple waste planning authority areas, where only a limited number of facilities would be required. A facility for the thermal treatment or final disposal of residual waste might be an example. The RSS should also provide for any requirement for waste management facilities identified nationally, for instance for handling especially hazardous waste.

- 8.96 The draft RSS fails fully to meet these requirements. We were told that the Assembly had commissioned a study which would help identify the broad locations in which waste facilities of sub-regional, regional or national significance should be accommodated. However, the results of that study are not yet available, and will have to inform an early review of the RSS.
- 8.97 The Assembly's suggested amendment to paragraph 11.28 of the draft RSS goes on to say that the identification of a specific site may be required before its sustainability can be evaluated. We do not consider that it is within the remit of the RSS to evaluate the sustainability of development on particular sites, and do not consider that this material should be included. Neither do we see any particular merit in the Assembly's proposed amendment to paragraph 11.34 of the draft RSS, which would encourage further research into the development of an integrated waste reprocessing park.

RECOMMENDATION

R8.12

In Policy EM13, the reference to "Tables 9.3, 9.4 and 9.5" should be replaced by a reference to "Tables 11.3, 11.4 and 11.5". The final paragraph of this Policy should be replaced as follows:

"For both the municipal, and the commercial and industrial waste streams, primary reception, treatment and transfer facilities should be located near to the sources of arisings. Secondary treatment and disposal facilities may be located on a sub-regional strategic basis, to serve a wider catchment area. Regionally significant facilities may be needed to serve the Mersey Belt, which includes the Manchester and Liverpool conurbations. The provision of nationally significant waste management facilities may be appropriate where the region offers a particular waste management advantage on a national scale.

Where it is appropriate at the sub-regional level, waste planning, disposal and collection authorities should work together to produce joint waste management strategies in partnership with the Environment Agency, the waste management industry, NWRA and other stakeholders. "

A new sub-heading “Pattern of Facilities” should be inserted before paragraph 11.27 of the draft RSS.

The second sentence of paragraph 11.27 should be amended to read “The capacity gap is clear, as almost all of the treatment capacity will be new.”

A new paragraph should be inserted after paragraph 11.28, to read as follows:

“The southern part of the region includes the conurbations of Merseyside and Greater Manchester. Strategic waste management facilities to serve this area could potentially be sited within a broad location that encompasses the following areas:

- **Cheshire**
- **Merseyside (including Halton)**
- **Warrington**
- **Greater Manchester**
- **Lancashire.”**

Radioactive Waste

8.98 Policy EM14 of the draft RSS deals with radioactive waste, which is an issue of particular importance in the North West. We note the concern expressed by Cumbria CC about the amount of radioactive waste that will result from the decommissioning of nuclear installations in the Region; and the inadequacy of existing facilities to deal with this. However, Policy EM14 indicates that “national and regional partners should work together to promote an agreed solution to the safe long-term management of radioactive waste.” The form of that solution appears to be largely a matter for national policy.

8.99 The supporting text at paragraph 11.42 of the draft RSS refers to “the Drigg shallow surface disposal site”. Copeland BC pointed out that this would be more accurately described as a storage site near Drigg. As this is clearly a matter of some sensitivity, we recommend that the wording in question should be amended.

RECOMMENDATION

R8.13

Radioactive Waste

In paragraph 11.42 of the draft RSS, the words “the Drigg shallow surface disposal site” should be replaced by the words “the shallow surface storage site near Drigg.”

Monitoring

8.100 The Assembly propose that a new paragraph should be added to that part of the RSS dealing with waste management, to describe the proposed monitoring arrangements. We agree with this.

RECOMMENDATION

R8.14

Monitoring Waste Management

A paragraph should be added at the end of that part of the RSS dealing with waste management, to cover arrangements for monitoring and updating baseline data, as shown in NWRA’s Briefing Paper 20.

RENEWABLE ENERGY

8.101 Policies EM15-17 in the draft RSS deal respectively with “A Framework for Sustainable Energy in the North West”, “Energy Conservation and Efficiency”, and “Renewable Energy”. In Briefing Paper 20 NWRA provided revisions of all three of these policies, plus parts of the supporting text. At the EiP they produced a further set of revisions (Ref EIP/NWRA/21) to Policies EM16 and EM17. Subsequently they produced a further proposed revision to the first part of Policy EM17 (Ref EIP/NWRA/22). EIP/NWRA/21 in particular was in large part directed towards reflecting the Draft Planning Policy Statement (Supplement to PPS1) on Planning and Climate Change. This had been published during the EiP, but before the relevant

session and the Panel asked all participants to take it into account in their contributions to the debate.

- 8.102 In our report we deal with each of the three policies in turn. It was Policy EM17 which was the most complex and covered the most ground; there were relatively few comments on the revised versions of Policies EM15 and EM16 though a number of significant points were raised. But before coming to the policies there is another matter which we should discuss.

Map of Broad Locations

- 8.103 Paragraph 7 of PPS22 (Renewable Energy) says that criteria based policies should be set out in RSS (as indeed they have been in Policy EM17, which we discuss later). These should be used "...to identify broad areas at the regional/sub-regional level where development of particular types of renewable energy may be considered appropriate." The Companion Guide to PPS22 refers (at page 31) to the Indicative Diagram in the North East RSS as an example and elaborates on the requirement in the third part of the box on page 33.
- 8.104 Such broad locations had not been identified in the North West. GONW were among those who criticised this ("...a significant omission") and they indicated that Policy EM17 "... should contain a map showing broad locations for renewable energy, in line with PPS22."
- 8.105 We discussed this at the EiP and though some parties, such as CPRE, doubted the value of the maps others, such as Npower Renewables Ltd (NRL) said that they had been of practical benefit in the North East. Be that as it may, the fact is that such maps are a requirement and we asked NWRA to explain the position. Their answer was that this was a matter of the short timescale in which the draft RSS had been prepared (though we noted that in the North East this work had taken place over a period of time, before work on the RSS itself commenced), and of resources. They indicated that even now they could not give a commitment to carry out this work – which would be expensive and time consuming. This was a point they made several times during the EiP – they were unsure of the financial resources which would be available to them in the future and there were a lot of demands on their budget. We do not think this is a matter for us. The fact is that this work needs to be done and without it the RSS is deficient. We mentioned this in Chapter 2 of our report when we were discussing the need for an early review.

- 8.106 This becomes more important because, later in the EiP debate, a number of parties argued strongly that there was a need for consistent information across the region. In particular there needs to be a region-wide assessment of landscape quality, and this might form part of the production of the map of broad locations. It is clearly something that needs to be provided at a strategic level. Cumbria CC have carried out work (the AXIS study), which is acknowledged to be inadequate; others have not carried out similar work. Amongst those who made this point, in various ways, were Cumbria CC, AGMA, Cheshire CC, CPRE and NRL.
- 8.107 Our inevitable conclusion is that maps of broad locations need to be prepared, not only to comply with PPS22 but because there is a demand from many parties for a consistent approach across the region. We think that this needs to be done as a matter of urgency.

RECOMMENDATION

R8.15

We recommend that maps of broad areas where the development of particular types of renewable energy may be considered appropriate should be produced as a matter of urgency and incorporated into an early review of RSS.

Policy EM15

- 8.108 Policy EM15 provides a framework for sustainable energy which is related to the principles of the energy hierarchy set out in figure 11.2 and the Regional Sustainable Energy Strategy. The second part of the policy deals with the role of Public Authorities in leading by example.
- 8.109 In Briefing Paper 20, NWRA proposed changes to introduce a reference to combined heat and power (CHP). There were those (such as MPU) who questioned the reference to CHP and pointed out that there were other solutions which might also be mentioned. The Assembly indicated that this was a response to Government exhortations to increase the use of CHP and provide a more favourable environment for its development.
- 8.110 The policy was based on a doubling of installed CHP by 2010 and CPRE proposed that a further doubling by 2020 should be added as an aspirational target. The Assembly indicated that the figures went forward only to 2010 because of a lack of

information beyond that date – further research was being carried out to feed in to a future review. We do not propose to recommend this change – not because we do not have sympathy with it but because we do not feel that there is a sufficient evidential base. However we have recommended an early review of RSS to take account of the “broad locations” issue and we would expect that a significant increase in the target would be included at that point.

- 8.111 The Assembly indicated to us that the figures in the proposed revised policy had been overtaken by the publication in November 2006 of “Rising to the Challenge” – the Climate Change Action Plan for the North West (Indicator M3 on page 8) and needed to be updated.
- 8.112 Though there were those who questioned the use of the energy hierarchy, those who supported it were in the majority and we think it should remain as a useful indication of priorities.
- 8.113 The Assembly in Briefing Paper 20 also proposed a minor change to a footnote and a more substantive change to paragraph 11.43 of the supporting text referring to the Energy Review. We support these proposals, neither of which is controversial.

RECOMMENDATION

R8.16

We recommend that Policy EM15 should be revised as proposed by NWRA in Briefing Paper 20.

We recommend that, reflecting the Climate Change Action Plan, the figures relating to Combined Heat and Power should be altered from “750 MWe to 1500 MWe” to “866 MWe to 1.5 GW.”

We recommend that footnote 175 and paragraph 11.43 of the supporting text should be amended as proposed by NWRA in Briefing Paper 20.

Policy EM16

- 8.114 Policy EM16 deals with Energy Conservation and Efficiency. NWRA proposed amendments to the second part of this policy in Briefing Paper 20 and they proposed further amendments at the EiP (Ref EIP/NWRA/21); it is on the basis of this version that we discuss the issue. We had requested comments from the Assembly and GONW on the implications of the Code for Sustainable Homes and "Building a Greener Future", which had been published during the EiP. The second set of amendments deals with this issue.
- 8.115 There were in fact relatively few comments in written evidence about this issue, and the proposed amendments to a large degree meet the points which were made. Most people wanted to see more specific requirements and the revision goes some way towards this.
- 8.116 There were, however, calls for more specific targets for energy reduction - for example from Lancashire CC, Lake District National Park Authority and others in their statements and from CPRE during the debate. They argued that the target for the reduction in greenhouse gas emissions which would be available by the summer as part of the Climate Change Action Plan (Indicator M1) should be included in the RSS. This will be a matter for GONW to consider at the time but we think this might well be a useful inclusion.
- 8.117 There was some discussion of the details of the wording of the proposed policy. GONW requested the inclusion of "it is anticipated that" before "it will be a mandatory requirement to meet the Code [for Sustainable Homes] ratings" - this has not yet been formally decided. We agree with this, as a matter of accuracy.
- 8.118 FoE and CPRE wished to see "promote" changed to "require" (that various actions are taken). HBF, who otherwise supported the proposed policy, did not agree and the Assembly felt that - since the Code was as yet voluntary - it would not be possible to "require" compliance with it. We accept this view.
- 8.119 GONW were disappointed that there was not greater reference to transport and locational decisions, and their effect on energy use and carbon emissions. This is mentioned in the supporting text, paragraph 11.44, which refers back to policies in the Transport Chapter (which, incidentally, need to be re-numbered). We think that the proposals we have made

elsewhere, particularly in relation to the spatial principles, are sufficient to deal with this and see no need to repeat the point – important though it is – here. GONW also sought a reference to the promotion of energy efficiency measures in existing buildings. This, it seems to us, can be little more than an exhortation at this stage but nonetheless it is an important issue and we accept the point. They also sought a reference to the elimination of fuel poverty, which we think could be added to paragraph 11.44.

- 8.120 FoE felt that the reference to “very good” BREEAM ratings should be changed to “excellent” in urban areas. We think – especially if the word “promote” is preferred to “require” that a reference could be added to refer to this point.
- 8.121 One point was made, by Scottish Power, on the first part of the Policy. (We use “Scottish Power” as shorthand for Scottish Power, Manweb and United Utilities). They expressed concern about the way in which local authorities responded to applications for network improvements, and suggested to us that there was an unacceptable degree of opposition. As a general point, this is something which needs to be dealt with in another part of the planning forest. But Scottish Power suggested ways in which the important role of local authorities in ensuring that provision was made for energy upgrades in terms of distribution connections and substations – the subject of this policy – could be drawn out. They suggested – and nobody opposed – the insertion of the words “and LPAs” after “Operators” in the first paragraph of Policy EM16; we agree that this is an important issue. While passing no judgement (because we do not have sufficient information) on whether or not local planning authorities are being unduly obstructive as Scottish Power allege, we do believe this would be a useful addition to the policy. Otherwise there was general support for the proposed revised policy.

RECOMMENDATION

R8.17

We recommend that in the first part of Policy EM16 the words “and Local Planning Authorities” should be added after “Distribution Network Operators”.

We recommend that the second part of Policy EM16 should be revised as follows:

“Plans and Strategies should actively facilitate reductions in energy requirements and improvements in energy efficiency by incorporating robust policies which promote:

- Minimum energy efficiency standards for new homes equivalent to Level 3 of the Code for Sustainable Homes by 2010, Level 4 by 2013, and Level 6 ‘zero carbon’ by 2016 (up until the date - currently expected to be April 2008 - when it is anticipated that it will become a mandatory requirement to meet the Code ratings);**
- Minimum energy efficiency standards for all other buildings to ‘very good’ (or where possible, in urban areas, ‘excellent’) of the Building Research Establishment’s Environmental Assessment Method (BREEAM);**
- Implementation of energy conservation measures and efficiency of design, layout, location and use of materials and natural resources in new buildings and refurbishment schemes;**
- The wider adoption of energy efficiency measures in existing buildings.”**

We recommend that GONW consider bringing in the target from the Climate Change Action Plan (Indicator M1) when work is complete.

We recommend the addition at the end of paragraph 11.44 of the following:

“...and will help to achieve the Energy White Paper objective of eliminating fuel poverty.”

Paragraph 11.45

8.122 The Assembly suggested, in Briefing Paper 20, an addition to paragraph 11.45 to deal with the Climate Change Action Plan, and this was further updated in the paper (Ref EIP/NWRA/21) submitted at the EiP. There were no comments on this other than the wish to bring in the M1 target, which we have considered above.

RECOMMENDATION**R8.18**

We recommend that the alteration to paragraph 11.45 proposed by NWRA in EIP/NWRA/21 should be accepted.

Monitoring and Review, and Other Changes to Supporting Text

8.123 The Assembly proposed in Briefing Paper 20 a change to paragraph 11.46 to refer to the need for bi-annual review of the targets. This was generally welcomed. We return to it later, when we discuss targets.

8.124 They also proposed a minor uncontroversial change involving footnote 183, which we accept. They further proposed the insertion of a new paragraph between 11.46 and 11.47 discussing heat generation targets. While some would have liked to go further on this topic we accept the Assembly's view that this would be premature in view of the lack of an evidence base and the ongoing development of the EU Renewable Heating and Cooling Directive.

RECOMMENDATION**R8.19**

We recommend that the change to paragraph 11.46, the change to footnote 183, and the new paragraph between 11.46 and 11.47 proposed by NWRA in Briefing Paper 20 should be accepted.

Policy EM17 – Renewable Energy

8.125 Most of the debate at the EiP, and most of the written evidence, concerned the long and complex Policy EM17 and the tables (11.6 and 11.7a-c) which support it. The policy had been the subject of a small but important revision in Briefing Paper 20, to which we return. Further amendments were proposed in EIP/NWRA/21 and 22.

8.126 In practice there is a series of issues here:

- The targets for the proportion of energy supplied from renewable source;
- The table which supports this at the regional level (11.6);
- The sub regional targets (table 11.7a-c) and studies;
- A number of specific points about particular technologies;
- The criteria;
- The final paragraph which deals with on-site renewables.

We deal with each in turn.

The Main Targets

8.127 EM17 aims for at least 10% by 2010 (rising to 15% in 2015 and 20% by 2020) of electricity supplied in the North West to be provided from renewable sources. This of course is in line with the Government's objective set out on page 6 of PPS22 and elsewhere.

8.128 There was some opposition to this proposition. Cumbria CC, for example, objected because "...these are aspirational only, and not related to what might be constructed during the period up to 2020, and what might be capable in terms of the capacity of the area to absorb that level of development" (statement). They said that there was no point in setting a target unless there was evidence to show that it could be met. AGMA generally supported this view and said that – especially in the period up to 2010 - the targets could not be achieved. MPU considered them to be "extremely demanding." Lancashire CC said that it "...will be difficult to achieve the targets" Cheshire CC generally supported the targets but were concerned that insufficient schemes were coming forward on the ground to enable them to be met.

- 8.129 There was some debate at the EiP flowing from these assertions. Industry representatives felt that it was essential to set stretching targets otherwise progress would be very slow. They referred to the propensity of Councils to reject schemes, especially for wind turbines, and indeed we were told that one had been turned down in the Region that very day, against the recommendation of officers. Industry representatives were critical of Cumbria CC's emerging Wind Energy Supplementary Planning Document, which they felt gave "an absolute blanket refusal" (Renewables North West) – a point with which Cumbria CC did not agree. We noted that nearly all the Council representatives were saying that the targets could not be met in their areas. CPRE supported the view that the targets could not be met – or at least that the evidence did not exist for such targets to be set.
- 8.130 We asked about the draft PPS Supplement on Climate Change. We asked whether parties felt that it – especially paragraph 22 - changed the situation. The penultimate point in that paragraph seemed especially relevant to us since parties had been expressing concern about landscape issues. Most felt that it did change the context – GONW for example said that it would "lower the hurdle." FoE felt that the Draft PPS represented "...more of a presumption in favour."
- 8.131 In the end we feel that it is clear that these targets must be retained – not just because they are national targets but also because, despite the views summarised above, there was a lot of support for them at the EiP. Cheshire CC, FoE, industry representatives and GONW supported them. NRL said that there should be no ambiguity; they and FoE said that the targets should be retained even if there were doubts about meeting the 2010 figure. FoE felt that the 2020 target should be 25%. Renewables Northwest said that the fact is that the Government has set targets – the endeavour must be to meet them. GONW said that though they were challenging, they *are* the targets we have to aim for. It was essential to have a regional steer – this could not be left to the local level.
- 8.132 We agree with this. We think it is absolutely essential to set targets if progress is to be achieved. We are concerned at the slow rate of progress so far; and we think the draft Climate Change PPS requires a sense of urgency to be injected into the proceedings. We think that – even if it were in compliance with Government policy – reducing or omitting the targets from RSS at this point would send all the wrong messages. We support

them. We note also that the targets are expressed as minima, and we hope that they might be exceeded.

- 8.133 There is an important point of detail – the point raised initially in Briefing Paper 20 – to be considered. The original policy referred to x% of the energy *supplied* in the North West; Briefing Paper 20 proposed changing this to energy *generated*. PPS22 refers to electricity “consumed or supplied.”
- 8.134 This was debated, with views being expressed on both sides but a majority in favour of “supplied”. It is a finely balanced issue. On the one hand electricity might be supplied from outside the North West and the region would then have little control over whether it was renewable. On the other hand if a single large plant such as Heysham were to close, that alone would lead to a dramatic but unreal increase in the proportion generated from renewables. It was argued that Government guidance required the use of “supplied” and PPS22 certainly points in that direction; the Assembly suggested that if the word was retained the policy should be altered to read “...which is supplied within the region” rather than “supplied in the North West.” We prefer to stick with “supplied” but are happy to recommend that change. We recommend a revised form of words later.

Table 11.6

- 8.135 Table 11.6, which sets out “Indicative Regional Renewable Energy Generation Targets”, caused some controversy. The issues fell into three categories. First, was there sufficient information to support the table? Secondly, should it be included in RSS, or relegated to an Appendix or omitted? Thirdly, what was its status, in relation to the wording of the policy?
- 8.136 The table sets out targets for different technology types, for 2010, 2015 and 2020. At the EiP the Assembly and their consultants elaborated on the purpose of the table (the way in which it was derived is summarised in the Technical Appendix Chapter 8 and (particularly) Annex 8.1). They explained that the figures it contains were seen as a way of achieving the overall targets for the region. They show one way in which this could be done, and they “have a pedigree” – are based on thorough research and examination. However they are flexible; they can respond to changing technology. Their main value is illustrative – they demonstrate to the Industry and others that the figures are achievable (though the Assembly accepted that meeting the 2010 target was going to be difficult). In all these

respects the table meets the advice set out in paragraph 5 of PPS22.

- 8.137 Parties questioned the evidence base for the table, though mostly in a rather general way. CPRE were particularly critical. They said that the evidence simply did not exist for them, that they should be deleted – or at least moved into an Appendix. Local authorities should set their own targets. The tables would become out of date rapidly as new technologies developed; for example new wind turbines might be twice as efficient as older models. If they were retained in some form they should be simplified – grouped for example into wind, solar, biomass, tidal/wave energy, and energy from waste. Cheshire CC said that without a comprehensive energy study for the region it was not possible for the targets in the tables to be justified. Lancashire CC had “concerns about the adequacy of the research”. AGMA and others made similar points.
- 8.138 Renewables Northwest on the other hand felt that the tables “...offer a balanced view of the make up of the renewables capacity.” They wholeheartedly supported the inclusion of specific and clear targets. GONW thought it was useful to have an indication of technology types as a steer, though they wished the fact that they were for guidance only to be clearer. FoE supported the table.
- 8.139 Our conclusion is firstly that the table does add value. Without this indication of the likely means of achieving the targets we think the 10/15/20% figures would be left floating rather meaninglessly - they need the back-up of the technology information to make them relevant and to point the way to achievement. We think the strength of the evidence base is underestimated – annex 8.1 of the Technical Appendix demonstrates that a reasonable process has been carried out. But we do agree - as we have already said – that much more work needs to be done on the capacity of the North West to accommodate technologies, especially wind power, as part of the preparation of the maps of broad locations.
- 8.140 We think therefore that the table should be retained, but we have considered whether it should remain as part of the RSS itself or be relegated to an Appendix. On balance we think it best retained within the RSS, where it will have prominence and status. We have also considered whether the simplification suggested by CPRE would assist. It would remove detail and make the table easier to understand; but at this stage we think the detail matters and should not be excluded. However this is

an evolving situation and as the tables are reviewed such simplification might be considered.

- 8.141 This does however lead us to refer back to the monitoring question which we discussed earlier in relation to paragraph 11.46; there is to be a bi-annual review and the figures will become out of date quite rapidly. This will, we assume, be reflected in the annual monitoring report. The early review of the RSS itself, which we have already recommended will provide an opportunity to update the table itself. We think that this needs to be explained.
- 8.142 Our main concern about the table is that we do not think the draft RSS as it stands adequately explains the status of the table or its relationship with Policy EM17. We indicated at the EiP that we felt the phrase (in EM17) that "...capacity should be developed in order to meet as a minimum the indicative capacity targets set out in tables 11.6 and 11.7..." was unclear. It is agreed that these are indicative figures, in which case meeting them as a minimum seems inappropriate. In response NWRA produced a proposed revision (Ref EIP/NWRA/22) which read "...capacity should be developed which will contribute towards the delivery of the indicative capacity targets set out in tables 11.6 and 11.7...." We think this is a more logical formulation and we recommend its inclusion in the policy (see below). But we feel that a better explanation is required in the supporting text. We do not feel that the sentence towards the end of paragraph 11.46 which deals with this is either adequate or accurate; we make a recommendation below.

Table 11.7 Sub-Regional Tables and Sub-Regional Studies

- 8.143 Many of the arguments about the sub-regional tables were the same as those for the regional table – that there is an inadequate evidence base and that their status is not clear. We come to the same conclusion – that they should be retained as a valuable way of indicating how the targets might be achieved, that they are flexible, and that their status needs to be more clearly explained.
- 8.144 There were however some further issues. In particular parties from the local authority side felt that they were hard done by – Cumbria CC in particular felt "...an unreasonably high burden" was being placed upon them – they were "...second only to Lancashire" in terms of their regional contribution. Others felt that meeting the targets for their areas was difficult or impossible. AGMA were concerned that the targets would be

used by applicants in relation to particular cases. MPU, though they agreed that insufficient progress was being made so far, felt that 11.7 was a "...step too far" and that these decisions should be made at local level.

- 8.145 We reject all of these points. A reading of PPS22 and of the Climate Change draft PPS makes it clear that the Government wants to see a positive approach to the provision of renewable energy. Authorities should be looking for opportunities not obstacles. We think that the tables are imperfect and will change; but we think that they help to provide an incentive to the industry and to local authorities to take a more positive approach. We recommend that they are retained – though of course they are subject to the clarification which we mentioned in relation to Table 11.6, and to bi-annual monitoring.
- 8.146 AGMA were concerned that some projects cross the boundaries of sub-regions. Clearly this is so, but we think it is not a good reason for omitting the tables; these are matters which can be dealt with as part of the monitoring.
- 8.147 Blackburn with Darwen BC were concerned at the separate category in Table 11.7 which included only themselves and Blackpool. The authorities are widely different in character and more than 30km apart. We agree with this, and the Assembly were unable to give a good reason why this situation should remain. We recommend that they are combined with Lancashire (as they already are for some categories) throughout the table.
- 8.148 Policy EM17 recommends that sub-regional studies are carried out of renewable energy resources so as to gain a thorough understanding of renewable energy resources. We think this is a sensible idea but we think it is important that these are carried out on a consistent basis. Some parties at the EIP questioned how these studies were to be organised and financed. NWRA indicated that they were willing to project-manage this work, but they could put only limited resources into it; they hoped that others would contribute to it. There is little more that the Panel can do other than to express strong support for the studies; resources are not within our remit.
- 8.149 Scottish Power requested a revision to the second paragraph of Policy EM17 to make the point that authorities needed to understand not just the supplies available but also issues relating to the network. There was no dissent from this proposal and we agree with it.

Particular Technologies

- 8.150 Parties raised points about two particular technologies within the tables.
- 8.151 Firstly there were considerable reservations about the inclusion of energy from waste, and much discussion as to which types of energy from waste might be legitimate. CPRE and FoE were particularly concerned about this. MPU on the other hand were very keen for it to be included - it is one of the waste treatment technologies which is needed, it is difficult to deliver, and policy backing would be helpful. While the Panel share the reservations which were expressed we do not feel we have the expertise to distinguish between the different forms of waste to energy or to suggest ways in which the figures might be altered. It already features at a low level in the waste hierarchy, though there is concern that it may prevent the movement of waste up the hierarchy. Nonetheless we recommend no change.
- 8.152 NRL were concerned that there was no allowance for growth in on- shore wind farms, single large wind turbines and small stand alone wind turbines between 2015 and 2020. Growth was likely both through new schemes coming forward and replacement of older projects by new and more efficient schemes. We agree with this point, but think it can be dealt with through the monitoring process.
- 8.153 In the light of all this we have a number of recommendations to make about the first two paragraphs (including the two bullet points after the second paragraph), the tables, and the supporting text.

RECOMMENDATION**R8.20**

We recommend that the first paragraph of Policy EM17 should read as follows:

"In line with the North West Sustainable Energy Strategy, by 2010 at least 10% (rising to at least 15% by 2015 and at least 20% by 2020) of the electricity which is supplied within the Region should be provided from renewable energy sources. To achieve this new renewable energy capacity should be developed which will contribute towards the delivery of the indicative capacity targets set out in Tables 11.6 and 11.7 a-c. In accordance with

PPS22, meeting these targets is not a reason to refuse otherwise acceptable development proposals.”

In the second paragraph we recommend the addition of the words “and network improvements” after “understanding the supplies available.”

In Table 11.7 we recommend the combination of the figures for Blackburn with Darwen and Blackpool with those for Lancashire.

In paragraph 11.46 we recommend the deletion of the last part of the penultimate sentence, and its replacement with the following:

“...for generating electricity. Tables 11.6 and 11.7 a-c provide indicative regional and sub regional targets. These are flexible and will change. However they provide an important indication of the way in which regional and sub regional targets might be met and new renewable energy capacity should be developed with the aim of meeting or exceeding these targets.”

Criteria

- 8.154 The next part of Policy EM17 deals with the criteria which PPS22 requires to be set out in RSS. PPS22 paragraph 1 (ii) requires RSS to contain policies “designed to promote and encourage, rather than restrict, the development of renewable energy....” The Companion Guide to PPS22 says that “criteria should be positively worded, rather than a list of negative constraints....” It adds that “criteria should not be so restrictive as to prevent the region from meeting its target” (page 28). The draft Climate Change PPS says that RSS should “ensure opportunities for renewable and low carbon sources of energy supply and supporting infrastructure are maximised” (paragraph 10).
- 8.155 The debate at the EiP largely surrounded the question of whether the eleven criteria set out in Policy EM17 were sufficiently positive. NWRA set out in the paper which they submitted to the EiP (Ref EIP/NWRA/21) a proposed revision, essentially to the introduction to the criteria rather than to the list itself, which was designed to make the policy more positive.

- 8.156 A number of parties remained concerned. Lancashire felt that the Region was unlikely to meet its targets unless the criteria were made more positive; they supported the changes in EIP/NWRA/21. Furness Enterprise Ltd wanted to see references to economic benefits and tourism included in the list (though others questioned the tourism implications). Renewables Northwest felt that the criteria needed to be more positive and GONW agreed – “we must be certain that we are in the business of promoting renewable energy.” They felt that most of the criteria read as constraints. They agreed that adding the economic benefits would be appropriate.
- 8.157 There were dissenting voices. CPRE did not like the more positive approach of EIP/NWRA/21. Cumbria CC, who saw the criteria not as a limitation but merely as factors that have to be considered, wished to see the second point tightened up: they suggested “no significant adverse impact on landscape character or visual amenity”, based on a policy in the Cumbria and Lake District Joint Structure Plan (op cit). Others (e.g. FoE and industry representatives) objected to this and we think it is a good illustration of the nature of the debate. In our opinion this is a negative approach. We do not think it is in line with the Climate Change draft PPS which says in paragraph 22 that plans should “avoid policies that set stringent requirements for minimising impact on the landscape ... other than in the most exceptional circumstances such as within nationally designated areas, avoid such restrictive policies.” The Cumbria CC formulation is of course open to interpretation; the word “significant” is not exactly precise. But we think it carries the danger of being used to oppose schemes in a way which is not in accord with Government thinking as expressed in PPS22 and the new Climate Change draft PPS.
- 8.158 This we feel applies to the list as a whole. We think that since it was drafted over a year ago the goalposts have been moved, and we think the criteria need to be re-cast. We are mindful of the slow progress in the provision of facilities in the region and the point which many parties made that there is a danger of the targets not being met. In order to avoid this eventuality we think the criteria need to be more positive.
- 8.159 In producing the following suggested list we have incorporated the NWRA formulation in EIP/NWRA/21 and also taken into account various detailed points which were made in evidence and during the EiP. (We have included various explanatory notes which, of course, should not form part of the policy).

RECOMMENDATION

R8.21

We recommend that the part of Policy EM17 dealing with criteria (from “Proposals and schemes for renewable...” to “...major woodlands and forests”) should be re-drafted as follows:

“Plans and Strategies should seek to promote and encourage, rather than restrict, the use of renewable energy resources. Local Planning Authorities should give significant weight to (note – wording from PPS 22 paragraph 1 (iv)) the wider environmental, community and economic benefits of proposals for renewable energy schemes to:

- **Contribute towards the capacities set out in tables 11.6 and 11.7 a-c; and**
- **Mitigate the causes of climate change and minimise the need to consume finite natural resources.**

Opportunities should be sought to identify proposals and schemes for renewable energy. The following criteria should be taken into account but should not be used to rule out or place constraints on the development of all, or specific types of, renewable energy technologies (note – wording from PPS22 paragraph 1 (iii)):

- **Anticipated effects on local amenity resulting from development, construction and operation of schemes (e.g. air quality, atmospheric emissions, noise, odour, water pollution and disposal of waste). Measures to mitigate these impacts should be employed where possible and necessary to make them acceptable;**
- **Acceptability of the location/scale of the proposal and its visual impact in relation to the character and sensitivity of the surrounding landscape, including cumulative impact. Stringent requirements for minimising impact on landscape and townscape would not be appropriate if these effectively preclude the supply of certain types of renewable energy, other than in the most exceptional circumstances such as within nationally recognised designations as set out in PPS22 paragraph 11. (Note – wording adapted from Draft Climate Change PPS);**

- **Effect on the region's World Heritage Sites and other national and internationally designated sites or areas, and their settings but avoiding the creation of buffer zones and noting that small scale developments may be permitted in such areas provided there is no significant environmental detriment (note – latter wording from PPS22 paragraph 12);**
- **Effect of development on nature conservation features, biodiversity and geodiversity, including sites, habitats and species;**
- **Maintenance of the openness of the Region's Green Belt;**
- **Potential benefits of development to the local economy and the local community;**
- **Accessibility (where necessary) by the local transport network;**
- **Effect on agriculture and other land based industries;**
- **Ability to make connections to the electricity distribution network which takes account of visual impact (as qualified above) (note – reference to 'ability to make...' proposed by Scottish Power);**
- **Integration of the proposal with existing or new development where appropriate;**
- **Proximity to the renewable fuel source where relevant – e.g. wood-fuel biomass processing plants within or in close proximity to the region's major woodlands and forests."**

We recommend no change to the next bullet point (about CHP) or the following short paragraph about engagement with local communities.

On Site Generation

8.160 We turn now to the last paragraph of Policy EM17 which deals with on site generation. It was suggested at the EiP – and the Assembly did not demur – that this should be separated out as a free standing policy. EM17 is very long and complex, this is a self contained topic which does not deserve to be lost in a larger policy; it is important enough to merit its own separate policy. There was no opposition to this, and we agree.

RECOMMENDATION

R8.22

We recommend that the last paragraph of Policy EM17 should be separated to become Policy EM18: On Site Generation.

- 8.161 The issues here related to the thresholds. The policy proposed firstly that it should apply to non-residential developments over 1000 sq metres and residential developments of over 10 homes. And secondly that in these cases renewable energy production of at least 10% of the development's predicted energy requirement should be provided on site. There were many who felt that one or both of these thresholds should be tightened and in EIP/NWRA/21 NWRA proposed a revision. This provided for the figure of 10% to rise to 15% by 2015 and 20% by 2020; it also encouraged local authorities to use lower development thresholds where they considered it practical and justified.
- 8.162 Though there was a lot of support for the first proposed change (the 10/15/20%), there was disagreement at the EiP, about the second. Renewables Northwest felt that the development threshold should be lowered to 2 dwellings; they pointed out that Bolton and Chorley were already applying 3, and Manchester were proposing to apply the target to all developments. Cheshire, supported by AGMA, felt that in practice a threshold of 2 would "panic people"; the debate had only just begun and there was a long way to go before acceptance of the policy. Renewables Northwest felt that the knowledge gap was not a good reason for holding back but Cumbria felt that a lower figure would cause problems in their particular circumstances because many sites were marginal or unviable for the market to deliver (the Draft Climate Change PPS provides for this in paragraph 23). HBF were opposed to a threshold as low as 2/3, though they were also concerned that a limit of 10 would lead to a large number of applications for 9 dwellings.
- 8.163 We conclude firstly that if it is possible to tighten the thresholds then this should be done. This is a changing field; new technologies are appearing, there is increasing public acceptance of the imperative, and since Merton introduced the idea, against some opposition, it has been embraced and promoted by the Government. We are conscious that, if the

early review which we have advocated takes place, that will provide an opportunity to make changes.

- 8.164 As to the figure of 10% on site renewables rising to 15% in 2015 and 20% by 2020, there seemed to be general acceptance at the EiP that this was both possible and desirable – though some (such as CPRE) thought that higher figures were possible. We are content to accept those figures for the time being, noting that – should it be possible to raise them at the time of the review – higher figures would of course be desirable.
- 8.165 The question of the development thresholds is more difficult. Should the NWRA formulation encouraging local authorities to be more ambitious be accepted? Or should some lower set of figures be adopted – and if so, what? The NWRA option seems conservative; those authorities which are committed will adopt more ambitious policies but it may be those which are not committed who most need the incentive/direction of a policy. On the other hand, we do accept the Cheshire view that an immediate reduction to 2 or 3 dwellings would be brave. The pragmatic solution is to halve the figures in the policy as it stands – to 5 dwellings and 500 sq metres of commercial development. There is no point in pretending that this is based on any scientific analysis; it is an attempt to find a middle way between the two sets of views expressed at the EiP and to find a formulation which nudges authorities and developers in the right direction fairly hard but without scaring the horses. Authorities should still be encouraged to do better and the policy should be revisited on review.

RECOMMENDATION

R8.23

We recommend that Policy EM18 should be worded as in EIP/NWRA/21 with the following exceptions:

Amend “1000 sq metres” to “500 sq metres”.
Amend “10 or more units” to “5 or more units”.

Other Points

- 8.166 A number of other points were made in evidence and at the EiP which we feel we should mention.
- 8.167 Firstly it was pointed out that there are other forms of renewable energy which policies do not address. NWRA indicated that they did intend to look at other technologies in the future. We accept this and anticipate that as the policies develop these will be brought into the picture; but we do not have any evidence on which to base possible changes at this stage.
- 8.168 Secondly, the EiP briefly discussed non-renewable forms of energy. Though views were expressed about nuclear energy, we think that is a matter not for us but for the Energy Review. However paragraph 11.50 does mention nuclear and other forms of generation, and Furness Enterprise Ltd suggested that a reference to gas and gas supplies should be added to it. This does seem a surprising omission and NWRA agreed that it should be added. But otherwise NWRA pointed out that, while PPS22 provides a policy background for renewables, there is no equivalent advice for other forms of energy.

RECOMMENDATION

R8.24

We recommend that a reference to gas should be added to paragraph 11.50.

- 8.169 Thirdly, GONW in their statement, made the point – which we have also made – that this is a fast changing field and that policy will need to evolve and change. They particularly wished to see a commitment to review RSS in line with the then anticipated Climate Change PPS. We agree completely with this – though of course we have been able to incorporate some aspects of the draft PPS. We do not feel it necessary however to recommend a specific addition to cover this point; we have already recommended an early review and clearly this will need to take into account the PPS and any other evolution of Government policy in this area.

CHAPTER 9 INTRODUCTION TO SUB-REGIONS

- 9.1 Part 4 of the draft RSS (Chapters 12-16) deals with the five sub-regions, and we go on to consider each in turn. Each contains a series of policies and a relatively brief supporting text. But there are some general points to make which apply to all five Chapters.
- 9.2 NWRA stressed the need to read these policies in the context of the Plan as a whole – a comment we strongly endorse. We have already referred to some of the concerns which were expressed about the very existence of the sub-regional policies, especially by GONW, and concluded that they should remain in the RSS. But we believe there are dangers in extending them too far – particularly of duplication but possibly of inconsistency with other parts of the RSS.
- 9.3 In this respect a particular point was made by some participants that the sub-regional policies did not adequately reflect the importance of environmental issues. Arguably this is the case. But in the light of the changes we have recommended earlier – such as the inclusion of a policy on climate change and other extensions to environmental policies in the spatial principles and the “EM” policies - we do not think it necessary to repeat or expand further on these points. The sub-regional policies stand only in the context of the other policies in the draft RSS and have no currency as a set of stand alone policies.

Sub-Regional Diagrams

- 9.4 Each of the sub-regional chapters includes a diagram showing the main features of the sub-region. Most parties thought that these were worth retaining but they were not regarded with much affection. We were unimpressed with them – especially that for South Cheshire, which we think is amongst the least informative in the entire history of regional planning in the UK.
- 9.5 In their statement on the Central Lancashire City Region, Lancashire CC submitted a suggested alternative. We think that this has considerable merit and should be adopted as a model for all the sub regions. However, since the RSS is not site specific (and in view of our recommendations in respect of Policy W2 and Table 8.1) we do not consider that the diagram should show “regional investment sites” or “sub-regional business sites.” Nor should it show proposals which are not in RSS, or other initiatives such as “Preston Vision” etc, which are not part of RSS. However we think that the general extent of

the Green Belt, AONBs and Universities might usefully be added. This is however to some degree a matter of cartography and it may be that some of these items, such as Green Belts or Regional Parks, need to be shown on the separate plans which we recommended in Chapter 3.

RECOMMENDATION

R9.1

Sub-Regional Diagrams

The Central Lancashire City Region Diagram produced by Lancashire County Council as part of their statement on Matter 9 should be used as the model for all the Sub-Regions.

The diagrams should, so far as possible cartographically, show the main extent of the urban areas, main transport infrastructure as shown on the LCC Central Lancashire diagram (including transport interchanges, main existing road and rail network and transport schemes proposed in the RSS, airports and ports), links to surrounding Regions and Sub-Regions, Key Service Centres, Universities, Pathfinder Areas, National Parks and AONBs, general extent of Green Belts, and Regional Parks.

CHAPTER 10 MANCHESTER CITY REGION

- 10.1 In Chapter 12 of the draft RSS, Policies MCR1-5 deal with the Manchester City Region. At the EiP we had a forensic discussion about the five policies. The most important relevant papers, apart from the draft RSS itself, are:
- NWRA Briefing Paper 20, which contains proposed revisions to a number of the MCR policies;
 - The Manchester City Region Spatial Strategy (MCRSS) (SDL/AGMA/17), which includes a proposed revision to all the MCR policies. (We were told that this is a document produced by the Greater Manchester Authorities with only limited involvement from the Cheshire Authorities which are part of the MCR);
 - NWRA's comments on the MCRSS policies (EIP/NWRA/16).
- 10.2 But before we deal with the detail of the policies there were two other issues which caused some debate at the EiP and which we should deal with. These are, firstly, the question of the "north-south balance" within the Manchester City Region and secondly the relationship with the High Peak District.

The North-South Balance

- 10.3 A number of parties in evidence commented on the balance of development within the Manchester City Region. The issue is a complex one, but essentially the argument of some parties was that, while the draft RSS reflected a concentration of economic development in the southern part of the MCR, the development of housing was proposed mainly to be in the centre and north. This, it was argued, was illogical and would lead to greater movement and commuting across the sub-region. AGMA and others argued that this was not the reality of the proposals, but at the very least it was suggested that the draft RSS was unclear about these relationships. GONW were particularly concerned about what they saw as a lack of clarity in this respect.
- 10.4 Some clarity is brought to this dilemma in the MCRSS, which in section 4 deals with what it calls the "dual approach". The City Region "...needs both to exploit its existing assets and to achieve the regeneration of its deprived communities, thus reducing the social and economic disparities which exist." Therefore the intention is that "... continued growth must be

supported in parts of the City Region that are already performing strongly whilst it is also important to generate additional growth in those parts which are lagging.”

- 10.5 This is a clearer formulation than exists in the draft RSS and it seems to us to encapsulate what both NWRA and AGMA are seeking to achieve. Not all parties thought this was reasonable or achievable however, and we have considered the issue carefully. It is certainly possible that it represents a triumph of hope over expectation; that seeking to achieve both of these aims is unrealistic; that it is another example of a policy which is “all things to all people”. We think that NWRA and AGMA need to be conscious of these dangers.
- 10.6 But we have asked ourselves about the alternatives, of which there are (over simplifying somewhat) two. The first is to restrain the economy of the south further, in order to help the more deprived areas further north. As some of the parties said at the EiP this seems a dangerous option, because there is no reason to suppose that any economic development deterred from locating in the south might go elsewhere in the MCR – it might go elsewhere in the North West or to another region. The fact is that to a degree the MCR has what the SURF Report (SDL/AGMA/13, page 126) described as a “south facing economy” and we can understand why there is an aspiration to take advantage of it, in the interests of both the MCR and the North West.
- 10.7 The second alternative is to locate less development in the centre and north and to “go with the flow” by allowing more housing and other growth in the south. There were parties, especially in the housing development field, who supported this option. But again it seems to us to be unsatisfactory, for several reasons. Most importantly, the aspiration to help the more deprived areas must be right, and it fits with our strategic principles. Secondly, the southern part of the region has for some decades been the subject of restraint, because of its environmental value and because of the danger of suburban sprawl extending out into Cheshire. Few think this should change now. Thirdly, there are significant opportunities for brownfield development, in the inner areas of Manchester/Salford and all the towns in the north of the sub-region.
- 10.8 If neither of these alternatives makes much sense we must accept that the “dual approach” is the right one, and at the EiP it was supported by all the Districts in Greater Manchester

(though not all of the rest of the MCR, and especially not Macclesfield, who were among the leading sceptics and described it as “unrealistic”).

- 10.9 Bolton, Wigan, Oldham and Tameside were among those who said that the northern towns were not “basket cases”. They had plenty of potential and their economies were showing signs of significant growth. They offered an excellent environment, whose potential was now being recognised by the development industry, good communications (though with room for improvement in certain respects), quality employment sites, and cheaper land. The Directors of Public Health for Greater Manchester supported this, noting that Greater Manchester had some of the worst health inequalities in the country. They saw the northern part of the conurbation as being attractive, but called for a more imaginative approach to transport improvements and in particular the development of orbital public transport routes running between the northern towns – which we think is worth investigating in future rounds of RSS. Manchester and Salford stressed both the quantity and potential of the extensive land available in their areas, and also the opportunities for economic development in the centre of the conurbation, based on various key economic drivers which are spelt out in the MCRSS. All the northern authorities accepted that restricting growth in the south would be self-defeating but anticipated that there would be spin-off from development in the south and centre of the conurbation which would increasingly assist them.
- 10.10 We therefore support the “dual approach”, whilst recognising its dangers. These are similar, on a smaller scale, to those we discussed in Chapter 4. There we questioned the extent to which, at the regional level, growth in the City Regions would in practice spread to assist the rest of the region and called for more research and investigation of ways in which this aim could be achieved. But we accepted that there was not another strategy which offered a better alternative. The same applies here. It is particularly important – as GONW indicated in their statement – that this is carefully monitored “...to ensure that delivery in the regional centre and the inner areas is at the level anticipated and also to monitor the effect of the policy on affordability in southern Manchester.” We think this should be specifically mentioned in the supporting text.
- 10.11 It is also important to ensure, so far as possible, that the jobs which are created in the south or the centre of the conurbation are accessible to those who are in need of them. Some parties

suggested that the kind of highly skilled jobs, in the media, Universities, knowledge industries etc, which were envisaged in the MCRSS would not be attractive to inner city residents and would increase commuting from other areas. Measures which mostly lie outside the scope of the RSS will need to be taken to match jobs to people, to implement training programmes as appropriate, and to tackle worklessness directly. The benefits of economic growth will be limited if this is not successfully achieved.

- 10.12 Paragraph 12.4 of the draft RSS does set out the “dual approach” but it was clear from the responses at the EiP that this had not been clearly understood.

RECOMMENDATION

R10.1

We recommend that Paragraph 12.4 is clarified to refer specifically to the “dual approach”, as set out in the MCRSS section 4, and that the importance of monitoring is stressed, by adding the following:

“Policies are based on a ‘dual approach’, which is to support growth in those parts of the City Region that are already performing strongly while generating additional growth in those parts which are lagging. It will be essential to monitor development to ensure that delivery in the regional centre and inner areas is at the level anticipated, and that it benefits those ‘who are most in need’.”

We also recommend that a statement made in relation to the Liverpool City Region – the third bullet point in paragraph 13.4 – should be incorporated into paragraph 12.4. This deals with the need to connect areas of economic opportunity to areas of greatest need; we cannot see why this is relevant in the LCR but not in the MCR.

Relationship to High Peak

- 10.13 We can deal with this matter quite briefly. There was some concern, from Friends of the Peak District in particular, about the references in Chapter 12 to High Peak. They were also

concerned about references in the NWGS and the Manchester City Region Development Programme – their statement sets out reasons and points out that High Peak is in fact within the East Midlands Region (as RSS acknowledges in footnote 197).

- 10.14 High Peak Council themselves, however, recognised that functionally High Peak is part of the MCR, and that draft RSS reflected the realities in its references to the area; they indicated that they were broadly content with draft RSS as it stood.
- 10.15 We accept that High Peak is functionally part of the MCR. This is clear for example from travel to work statistics (see e.g. NWRA Briefing Paper 1). We note that in paragraph 17.16 of the draft RSS it is proposed to carry out a cross-border study between the MCR and East Midlands-High Peak. We see no need to recommend altering the references in Chapter 12, but we urge that the proposed cross border study is completed as soon as possible in order to ensure that the two RSSs for the North West and East Midlands are compatible in respect of this area. GONW wished to see the objectives for such a policy set out in RSS but because they obviously need to be agreed with East Midlands Regional Assembly and other parties outside the North West we would be content for the objectives to be set at the outset of the study.

The Policies

- 10.16 What follows is our attempt to make sense of the rival versions of the MCR policies. There was a lot of support for the SDL/AGMA/17 version, and the MCRSS provided a sound and sensible set of arguments which in some respects appeared as a more imaginative and comprehensive sub-regional policy statement. But, we stress once again the need to view these policies in the context of the RSS as a whole; they are not a set of stand-alone policies. We find that in many cases the AGMA alternative creates a danger of repetition of earlier policies, or even inconsistency, and that the original NWRA version often provides a more consistent, concise and user friendly basis for policy. We propose amendments to it in the light of the AGMA version however, and offer some brief comments after each policy as to our reasons. We have also taken into account detailed changes proposed by a number of other parties in their evidence and statements. For the avoidance of doubt, where Briefing Paper 20 proposes changes to the draft RSS policies, it is to those that we refer when discussing the Assembly's

proposals; where it does not suggest a change, of course, we refer to the original draft RSS policies.

RECOMMENDATION

R10.2

We recommend that Policy MCR1 should read as follows:

Policy MCR1 Manchester City Region Priorities

“Plans and Strategies in the Manchester City Region should:

- **Support interventions necessary to achieve a significant improvement in the sub-region’s economic performance by encouraging investment and sustainable development in the Regional Centre, in or on the edge of the centres of the surrounding towns, and at other key locations which accord with Policies DP1-8, in order to contribute to the growth opportunities identified in Policy W1;**
- **Secure improvements, including the enhancement of public transport links, which will enable the inner areas and the northern part of the City Region to capture growing levels of investment and reduce sub-regional disparities. Particular attention should be given to assisting with programmes to address worklessness;**
- **Accommodate housing development in locations that are accessible by public transport to areas with strong economic prospects. A high level of residential development will be encouraged in the inner areas to secure a significant increase in the population of these areas;**
- **Provide high quality housing to replace obsolete stock and where appropriate refurbish existing properties, to meet the needs of existing residents, and attract and retain new population in order to support economic growth;**
- **Improve the City Region’s internal and external transport links in line with the priorities for transport investment and management set out in Policy RT9;**

- **Maintain the role of Manchester Airport as the North of England’s key international gateway in line with Policy RT5 and paragraph 10.18;**
- **Develop the role of Manchester as a key public transport interchange and gateway to the region in line with Policy RT3 and enhance the accessibility of the Regional Centre by public transport to support economic growth and to ensure that the rest of the City Region can fully share the benefits of the wide range of economic, cultural and other opportunities it provides. Investment should support Policies MCR2 and MCR4 in particular;**
- **Develop the roles of Wigan and Warrington as key public transport interchanges in line with Policy RT3;**
- **Environmental resources should be focussed where they are most needed and will have the greatest benefit, to facilitate the sustainable development of the Regional Centre and Inner Areas. This includes integrated flood management works, the remediation of contaminated land, and provision of high quality green infrastructure as part of comprehensive regeneration schemes.**

Proposals and schemes will be directed primarily towards locations where they can contribute to these priorities.”

10.17 We have for the most part used the NWRA Briefing Paper 20 formulation for this Policy. In respect of the AGMA version, we felt that the first bullet point was more general than the draft RSS version and we particularly felt that the reference to Green Belts duplicated (and may conflict with) Policy RDF5. We felt, as NWRA did, that their second point was a question of implementation rather than policy. Their third repeated a list of economic drivers which is essentially already covered in Policy W1; and we did not think it right to refer to the City Region Development Plan, which is a non-statutory document and may change during the life of the RSS. AGMA also included Manchester Airport as a “growth accelerator” in this bullet point, and there was some debate about this during the EiP. There were suggestions that it should be added to Policy W1. Others wished to see no reference to growth around the Airport. We have chosen not to include any reference to this point (though we deal with the Airport’s gateway role below). We do not see

the area around the Airport as a focus for development – other than for essential operational development – and we would not wish this policy to convey the impression that further allocations beyond those which already exist for general employment uses would be acceptable.

- 10.18 We have incorporated part of AGMA's fourth point into our first. We preferred on balance the NWRA formulations on housing, which we felt were more comprehensive, though we do not feel strongly about this choice. We also preferred the NWRA approach to transport, which relates back to the RT policies.
- 10.19 We have retained the reference to the Airport as a gateway which NWRA included in their Policy MCR1. AGMA proposed in their paper to include a separate policy on the Airport (MCR6). We do not think this is necessary or desirable, and we think that with the changes we have recommended to Policy RT5 and the subsequent paragraph, all the points which AGMA wish to see in the RSS are covered. Our recommendations indicate the need for public transport improvement and the need to ensure that non-operational development is located on suitable sites in accordance with the criteria in Policies DP1-8. We also deal with the Green Belt issue elsewhere. We have added a reference to worklessness taken from the LCR policies, as suggested by GONW in their Briefing Paper 9. We have added the reference to proposals and schemes which appeared at the end of Policy CLCR1 in the draft RSS; we could not see why it was relevant in one sub-region and not another.
- 10.20 We have imported the final point, about environmental issues, from AGMA's comments on MCR2; even though the Assembly described it as "somewhat generic", it seemed to us to fit here because it does in fact express a priority for investment which matches the overall aim to support the regional centre and inner areas. AGMA had suggested a much more general reference to Green Infrastructure as an addition to MCR1 but we did not feel that this added to what appeared in Policies EM1 and EM3.
- 10.21 So far as the supporting text is concerned, SDL/AGMA/17 provides a lengthy "reasoned justification" which would replace paragraphs 12.1-12.4 of the draft RSS. The Panel find it difficult to advise here; the AMGA text is perfectly sensible; it covers broadly the same ground as the draft RSS itself but at rather greater length and it adds a number of points – for example on transport – which were not in Chapter 12. On balance we feel that the more succinct version provided in the draft RSS is preferable, essentially because of its brevity and

because we feel that the AGMA version tends to repeat points which are covered elsewhere. There is benefit in retaining the original text where possible because it adds to the consistency of approach as between the various sub-regional chapters.

10.22 GONW in their statement suggested that there was insufficient information about the character, distinctiveness and role of the MCR, including its actual contribution to GVA (though this is briefly mentioned already in paragraph 12.2), and suggested that this should be spelt out. However we appreciate the brevity of the current supporting text and we do not see a real need for elaboration.

10.23 GONW also felt that there was a need to say more about transport in this chapter:

...to address the need to encourage sustainable transport use. The location of development should either minimise the need to travel or maximise use of existing and approved sustainable transport infrastructure.

We were surprised by this, given GONW's unhappiness about the sub-regional sections, and we repeat our point that the RSS must be seen as a whole. There are dangers of repetition. We agree with the importance of these points but we think that the spatial principles and the transport policies clearly spell them out – and we do not recommend any further addition.

RECOMMENDATION

R10.3

We recommend that Policy MCR2 should read as follows:

"Policy MCR2 Regional Centre and Inner Areas of Manchester City Region

- **Plans and Strategies should ensure that the Regional Centre of the Manchester City Region continues to develop as the primary economic driver, providing the main focus for business, retail, leisure, cultural and tourism development in the City Region. The expansion of the knowledge economy throughout the Regional Centre, and particularly related to the Universities, will be a particular priority;**

- **Proposals and schemes for residential development in the Regional Centre will be acceptable where they are part of mixed use employment schemes that comprise a good range of housing sizes, types, tenures and affordability and where they contribute to the vitality and viability of the Regional Centre;**
- **Residential development should be focussed in the inner areas adjacent to the Regional Centre in order to secure a significant increase in their population, to support major regeneration activity including the Manchester-Salford Housing Market Renewal Pathfinder, and to secure the improvement of community facilities and the creation of sustainable communities. The emphasis will be on providing a good range of quality housing, in terms of size, type, tenure and affordability, with a high quality environment and accessible local facilities and employment opportunities;**
- **Plans and strategies should provide for employment within the inner areas in accordance with Policies W2 and W3.”**

10.24 In the case of the first two bullet points we have largely preferred the NWRA formulation (from the original draft RSS – there was no amended version in Briefing Paper 20) to that of AGMA, though we have made some amendments. As NWRA indicated, AGMA’s version essentially covers the same ground but while it is unobjectionable we do not think it preferable. However we do think that the AGMA wording on inner area housing (our third bullet point) brought greater clarity and we have adopted it. We do not think the AGMA addition about the importance of Trafford Park adds value, and agree with NWRA that there is little logic in singling out this particular employment area – important though it obviously is – for a mention. AGMA suggested two insertions – their third and sixth – about transport but we believe that they are already covered elsewhere – in the case of the sixth point, Policy MCR1 deals with the issue and in the case of the schemes mentioned in the third point we believe that they are covered in the Transport chapter. We have moved the AGMA seventh point about the environment to Policy MCR1 as indicated above.

10.25 We referred earlier to the question of the definition of the Regional Centre and Inner Areas. Footnotes 202 and 203 provide definitions which we are content to accept – but as we

indicated earlier our lack of local knowledge leads us to do so with some caution. We note that SDL/AGMA/17 (page 22) includes a very similar definition though it adds a reference to Sportcity – we do not feel able to comment on this suggestion. RSS is not site specific and it will be at the local level that precise definitions and plans are produced.

- 10.26 In respect of the supporting text we have the same situation as we had in relation to Policy MCR1, with a slightly lengthier and perfectly reasonable text proposed by AGMA to replace paragraphs 12.6-12.8 of draft RSS. On balance we find once again no compelling reason to recommend a change to the original supporting text.

RECOMMENDATION

R10.4

We recommend that Policy MCR3 should read as follows:

“Policy MCR3 Southern Part of the Manchester City Region

Plans and Strategies in the southern part of the City Region should sustain and promote economic prosperity consistent with the environmental character of the area and the creation of attractive and sustainable communities by:

- **Focussing employment development in or on the edge of town centres in the southern towns, or at brownfield sites which accord with the criteria in Policies W2 and W3, to support the overall economic growth of the City Region and to meet local needs and regeneration requirements. Sites should be of an appropriate scale, and accessible by public transport, walking and cycling;**
- **Residential development will be allowed, in accordance with Policy L4, where it meets local and affordable housing needs, plus a limited amount of additional general market housing, in sustainable locations which are well served by public transport, to support local regeneration strategies.”**

We recommend that in paragraph 12.9 of the supporting text the words: “...continuing the approach established in the adopted RSS” should be added after “...sufficient affordable housing”, as proposed in NWRA Briefing Paper 20.

- 10.27 In this case both NWRA (Briefing Paper 20) and AGMA put forward policies which distinguished between the forms of economic development identified as growth drivers in Policy W1 and other forms of economic development. We felt that this was an artificial distinction. We do not consider that a proposed food processing plant (for example) could or should be denied permission to locate in the southern part of the City Region on the grounds that it would not contribute to the “growth opportunities” listed in Policy W1. We have therefore combined the first two bullet points from the draft RSS, and emphasised the need for employment development to comply with the criteria in our recommended Policies W2 and W3.
- 10.28 The second bullet point, on housing, was the subject of some controversy at the EiP, and there was a view that the AGMA alternative would have been too permissive. The term “to meet expected needs” was seen as being imprecise. So we recommend the NWRA wording, but we have tied it back to Policy L4. We suggest omitting the third AGMA point on transport, which we think repeats points made elsewhere (including MCR1). AGMA also suggested a fourth point about environmental and rural issues. Though this is perfectly sound, we do not believe this adds usefully to the policies in the “EM” chapter or to the earlier Policy (RDF3) on rural areas.
- 10.29 There is another important issue in relation to the southern part of the MCR which caused considerable debate at the EiP – the question of whether there should be a specific policy relating to North Cheshire – or at least a sub-policy within MCR3. A number of parties referred to Policy SD4 in RPG13, which had contained such a policy, referring essentially to the need for restraint in that area. CPRE (in RESP/584/CPRE/Policy MCR3) suggested a form of words which would cover this (in their penultimate paragraph). Others – notably Macclesfield – supported the inclusion of such a policy but Vale Royal were concerned about its effects on their aspirations for Northwich.

- 10.30 We asked NWRA for advice as to why they had not retained Policy SD4 (or a similar policy) and their response is in EIP/NWRA/8. They indicated that in their view it had served its purpose and that it was superseded by other policies in draft RSS. They did not support the inclusion of an extra policy statement but in Briefing Paper 20 they did suggest an addition to the supporting text (paragraph 12.9): "...continuing the approach established in the adopted RSS" which indicated, specifically in relation to housing, that there was to be no change. GONW felt that Policy SD4 had been difficult to implement but expressed some support for the CPRE version (though not their definition of North Cheshire, based on various major road corridors, which was also taken from RPG13). AGMA however felt that the CPRE proposition was confusing.
- 10.31 It is a fine balance as to whether such an addition to policy is necessary. Given that Policy RDF5 indicates no need to alter Green Belt boundaries for some time, that the housing proposals in Policy L4 indicate relatively limited amounts of development in North Cheshire, that the spatial principles, regional spatial framework and a whole range of other policies all point to a concentration of development in the urban areas, and that the employment site criteria also point to locations close to the main population concentrations, it does seem to the Panel that the position is clear. The RSS, taken as a whole does require a continuation of the policy of restraint in North Cheshire. The only question is whether it needs to be made more explicit in Policy MCR3. On balance we think not, but it is a fine judgement. We are not especially attracted by the CPRE formulation. For example its reference to "...preventing expansion of existing settlement boundaries into the Green Belt" is nugatory given the content of Policy RDF5. We support the additional wording proposed by NWRA for insertion into paragraph 12.9 (in Briefing Paper 20) and we think this provides reassurance, if it is needed, that there is no appreciable change of direction so far as North Cheshire is concerned.
- 10.32 As to the rest of the supporting text, we again have an alternative from AGMA. We are unhappy about one particular part of it – on housing – where it seems to us to imply a more permissive approach than the policy actually states. In general we again prefer the much more succinct formulation of NWRA. We note the reference here to High Peak, which we discussed earlier, and to the need to work with the East Midlands Regional Assembly. One further point which arose during the EIP was the question of development at Northwich, which was of concern to

Vale Royal. We note the reference in paragraph 12.9 which we believe is adequate to deal with the point.

RECOMMENDATION

R10.5

We recommend that Policy MCR4 should read as follows:

“Policy MCR4 Northern Part of the Manchester City Region

Plans and strategies for the northern part of the City Region should support the transformation of the local economy, regenerate communities, and enhance the environment. They should:

- **Secure improvements which enable the area to compete more effectively for economic investment now and in the future, helping to achieve significant improvements in productivity and creating the conditions for sustainable growth. This will require significant interventions to improve skill levels within the labour market, to deliver appropriate development sites, and to secure necessary infrastructure improvements. Employment development should be focussed in or on the edge of the town centres of the northern towns, or at brownfield sites and other sites which accord with the criteria in Policies W2 and W3, in order to support the overall economic growth of the sub region and to encourage the ‘spin-off’ of functions linked to the Regional Centre;**
- **Expand the quality and choice of housing (in terms of size, type, tenure and affordability) in line with the approach set out in Policy L4;**
- **Use the HMR Pathfinder in Oldham and Rochdale as an opportunity for wide ranging change in the economic and housing role of these areas, the renewal of communities and investment in new infrastructure.”**

10.33 Here we have adopted a mixture of the AGMA and NWRA (draft RSS) formulations for the first point. We have retained the RSS formula, with some expansion, for the second and third points. We have omitted references to transport (even though in this

case NWRA themselves included a clause) in order to be consistent with our previous recommendations; we accept the importance of improving transport connectivity between the northern part of the conurbation and the centre and south, but believe this is covered elsewhere (e.g. in Policy MCR1). As in Policy MCR3, we think the proposed AGMA insertion on green infrastructure and rural issues adds little to policies elsewhere in RSS.

- 10.34 As to the supporting text we again prefer the original draft RSS version on grounds primarily of brevity and consistency. We particularly support the reference in paragraph 12.13 to links with the Central Lancashire City Region; we made a number of points about this relationship earlier in our report and support the need for further research and understanding.

RECOMMENDATION

R10.6

We recommend that Policy MCR5 should read as follows:

“Policy MCR5 Strategic Framework for the Regional Town of Warrington

In Warrington plans and strategies should:

- **Support its role as a source of employment for an area including Warrington, Knowsley, Halton, St Helens and Wigan;**
- **Focus development in or on the edge of the town centre, on brownfield sites that are accessible by public transport, walking or cycling, and are in accordance with the criteria in Policies W2 or W3;**
- **Support regeneration and restructuring of the older urban areas;**
- **Not allow further significant outward expansion of the town on to open land.”**

- 10.35 In this case we have largely employed the draft RSS policy as amended in Briefing Paper 20. Warrington themselves clearly indicated support for it during the EiP – they described it as “clear and crisp”. The second bullet point referred to a particular broad location for a major investment site in Policy

W2. Because we have recommended changing W2, and introducing criteria rather than referring to broad locations, this would be inappropriate. We have proposed replacing it with the AGMA formulation. As before we do not think the proposed AGMA additions on transport and the environment are useful. We have relocated the reference to the key public transport interchange to Policy MCR1 alongside Wigan.

10.36 As in all the policies we propose replacing the word “will” with “should” in line with the legal opinion to which we referred earlier in our Report.

10.37 Again we prefer the original single paragraph supporting text to the lengthier AGMA version.

10.38 As we have already indicated we do not support AGMA’s proposal for a new Policy MCR6 dealing with the Airport – for the reasons we have given.

CHAPTER 11 SOUTH CHESHIRE SUB-REGION

- 11.1 Chapter 16 of the draft RSS contains a single policy for the South Cheshire sub-region, and three supporting paragraphs. NWRA Briefing Paper 20 contains a suggested revision of the Policy.
- 11.2 We believe that the location of this Chapter, after the sections on Central Lancashire and Cumbria and North Lancashire, is illogical. South Cheshire clearly has links with Merseyside and, particularly, the Manchester sub-region, but not with the others; we think it would be more logical to move it to an earlier position in the RSS.

RECOMMENDATION

R11.1

We recommend that Chapter 16 on South Cheshire should be moved forward and follow on from the Manchester City Region as Chapter 13.

- 11.3 We referred earlier to some confusion about the definition of the South Cheshire sub-region – in particular the question of whether it includes part of Congleton District. Chapter 16 defines the sub-region as consisting just of Crewe and Nantwich, and this accords with our earlier conclusion. Though in places Alsager and Sandbach are shown as being in South Cheshire (e.g. in Table 7.1), we agree with Congleton’s view that the whole of that district should fall within the MCR. We have taken into account the view of Crewe and Nantwich that in practice the Housing Market Area (HMA) embraces the southern part of Congleton and we discussed earlier the need for a review of RSS to take account of HMAs – but we do not believe there is sufficient research or consensus available on the subject for it to form an input to this round.
- 11.4 We have also referred earlier to the proposal in paragraph 17.16 of the draft RSS for a “Cheshire cross-border study with West Midlands Region” – covering Crewe and North Staffordshire. We agree that this is an important step that needs to be taken and incorporated in a future review of RSS. We believe that Congleton should be involved in this

study because of the obvious links between parts of that district and North Staffordshire.

- 11.5 We have considered comments made by NWDA, Jennings and others regarding Policy CH1.

RECOMMENDATION

R11.2

We recommend that Policy CH1 should read as follows:

“Policy CH1 Overall Spatial Policy for South Cheshire

Plans and Strategies should:

- **Promote the role of Crewe as a key regional town, transport interchange and gateway to the region;**
- **Provide for regeneration to improve the environment, economy and image of Crewe;**
- **Continue the protection and enhancement of the historic environment of Nantwich and its contribution to the sub-region’s economy, tourism, quality of life and regeneration.”**

- 11.6 This is the wording as in Briefing Paper 20. We feel either that it embraces the comments of others (e.g. Jennings) or that other comments (e.g. the NWDA’s about the need to strengthen references to regional investment sites) are covered elsewhere.
- 11.7 Crewe and Nantwich in their statement referred back to a reference in paragraph 9.19(k) to the context in which the housing market operates, and felt that this needed to be reflected in the South Cheshire Chapter; however we see no need to repeat this point. They also referred to both the regeneration needs of the town and its prospects for economic growth; we take these points, but believe that the policies both in this chapter and elsewhere provide for these issues to be addressed.
- 11.8 Cheshire CC, in their statement (which superseded their original evidence) suggested a change to the first part of paragraph 16.2 of the supporting text (which apart from

anything else suffered from a typographical error). We think this offers a clearer and more comprehensive view, though we do not recommend its precise adoption and retain the last few words of the draft RSS version.

RECOMMENDATION

R11.3

We recommend that the first part of paragraph 16.2 should read as follows:

“The priority for South Cheshire is to build upon the economic, educational, social, cultural and transport links with neighbouring areas and at the same time ensure sufficient development is delivered to meet local regeneration needs....”

CHAPTER 12 LIVERPOOL CITY REGION

12.1 In Chapter 13 of the draft RSS, Policies LCR1-4 deal with the Liverpool City Region. At the EiP we had a forensic discussion about these four policies. The most important relevant papers are:

- NWRA Briefing Paper 20, which contained a set of proposed changes to Policies LCR 1-3;
- NWRA Briefing Paper 27 which contained a proposed revision of Policy LCR4 in the light of the West Cheshire/North East Wales sub-regional study;
- A letter and attachment from MPU dated 21 December (Ref EIP/MPU/1) which contained a suggested revision of all the four policies, though their revision of Policy LCR4 was effectively overtaken by Briefing Paper 27;
- NWRA's comments on the MPU document (Ref NWRA/EIP/7).

What follows is our attempt to make sense of these rival versions.

12.2 While there was some support for the MPU version, it was our general conclusion in the light of the debate that in fact the original NWRA set of policies offered the more consistent, concise and user-friendly basis for policy. We propose amendments to it in the light of the MPU suggestions however, and offer some brief comments after each policy as to our reasons. We have also taken into account detailed changes proposed by a number of other parties in their evidence and statements. Policy LCR4 falls into a slightly different category from the others because of the West Cheshire/North East Wales sub-regional study. In all cases we have based our conclusions, in respect of the Assembly's policies, on the proposals in Briefing Papers 20 and 27.

RECOMMENDATION

R12.1

We recommend that Policy LCR1 should read as follows:

“Policy LCR1 Liverpool City Region Priorities

Plans and strategies in the Liverpool City Region should:

- **Focus sustained and co-ordinated programmes to maximise economic potential and promote urban renaissance and social inclusion within the Liverpool City Centre and its surrounding Inner Area (the New Heartlands Housing Market Renewal Area);**
- **Focus a sufficient proportion of new housing development and renewal (and related social and environmental infrastructure) within the inner areas to meet the objectives of the Housing Market Renewal Initiative and, consistent with this, make provision for an increase in the supply of affordable and market housing required to address demographic needs and to support economic growth and regeneration;**
- **Promote economic development, urban renaissance and social inclusion, complementary to the programmes within Liverpool City Centre and the Inner Areas, in the remaining northern part of the Liverpool City Region;**
- **Maximise the employment potential of the Strategic Investment Areas (SIAs) and Economic Development Zones (EDZs);**
- **Promote sustainable growth and development in Ellesmere Port and Neston and Warrington that is complementary to programmes and development in Liverpool City Centre and the Inner Areas;**
- **Promote the sustainable growth and development of the West Cheshire/North East Wales sub-region so as to maintain its role as an important component of the LCR economy and promote joint working between Authorities and Agencies for its strategic planning and management;**
- **Support interventions necessary to achieve a significant improvement in the sub-region’s economic performance by encouraging investment and sustainable development in Liverpool City Centre, to maintain and**

enhance its role as a regional centre, and in the surrounding towns in order to contribute to the growth opportunities identified in the Regional Spatial Framework and in Policy W1;

- **Improve the City Region’s internal and external transport links in line with the priorities for transport investment and management set out in Policy RT9;**
- **Support and develop the roles of Liverpool John Lennon Airport and the Merseyside Ports, in line with Policies RT5 and RT6, especially the Port of Liverpool as the only Port of national significance for deep-sea trade in the North of England;**
- **Develop the role of Liverpool as a key public transport interchange and gateway to the Region in line with Policy RT3 and enhance the accessibility of the Regional Centre, particularly by public transport walking and cycling to support its role as the main economic focus for the City Region;**
- **Enhance the accessibility by public transport of the New Heartlands Housing Market Renewal Pathfinder Area and transport links between this and other disadvantaged areas and key employment, education and healthcare locations. Particular attention should be given to assisting with programmes to address worklessness.**

Proposals and schemes should be directed primarily towards locations where they can contribute to these priorities.”

12.3 In producing this draft we have taken the following into account. We have included a general reference to SIAs and EDZs (whilst removing them from other policies) even though NWRA believe that some of them are of sub-regional rather than regional importance. The development of Atlantic Gateway, Approach 580, Widnes Waterfront and similar areas seems likely to fit well with the overall strategic principles of the RSS.

12.4 We feel that the references to West Wirral and West Lancashire in this Policy conflict with references to the same locations in Policy LCR3 and prefer the latter formulation. We have omitted the site specific references to transport schemes which MPU proposed (Mersey Gateway, light rapid transit); the Transport chapter of

the draft RSS deals with lists of proposed schemes and priorities, and we agree with NWRA that to pick out particular examples in the sub-regional sections is not helpful.

- 12.5 In line with our recommendations elsewhere in respect of the Chester area we have, in the sixth bullet point, suggested removing the phrase “key economic driver” (as proposed by NWRA in Briefing Paper 27) and replacing it with a revised wording which retains the emphasis on joint working.
- 12.6 We have again imported the reference to “proposals and schemes”, as we did in the MCR policies, from the Central Lancashire Chapter; we feel it applies to all the City Regions.
- 12.7 MPU put forward a “reasoned justification” for their version of Policy LCR1. As we understand it, this would replace paragraphs 13.1-13.5 of the draft RSS. It says much the same thing, and is unobjectionable. On the whole we think the NWRA version is sharper and more pointed (for example in paragraph 13.5 where it talks about the need for restraint in certain areas – a point which is missing from the MPU version). As we said in relation to the MCR Chapter there is advantage in sticking with the original version in terms of the consistency of the RSS. We recommend no change.

RECOMMENDATION

R12.2

We recommend that Policy LCR2 should read as follows:

“Policy LCR2 The Regional Centre and the Inner Areas of the Liverpool City Region

The Regional Centre is the primary economic driver of the Liverpool City Region and plans and strategies should support and enhance this role by:

- **Focusing appropriate commercial, retail, leisure, cultural and tourism development within the regional centre further to develop its role as the regional shopping centre, main employment location and primary economic driver of the City Region;**
- **Providing for proposals and schemes for residential development in the Regional Centre where they are part of mixed use employment schemes that comprise a good range of housing sizes, types tenures and**

affordability and where they contribute to the vitality and viability of the Regional Centre;

- **Expanding the knowledge economy within the regional centre particularly by maximising the research and development roles of the Universities and delivering knowledge nuclei sites and the expansion of professional services.**

They should focus residential development in the Inner Areas adjacent to the Regional Centre in order to secure a significant increase in population and to support major regeneration activity. This will entail:

- **Maintaining and enhancing the roles of Birkenhead and Bootle to provide community facilities, services and employment;**
- **The development of the New Heartlands Housing Market Renewal Pathfinder to revitalise housing in Liverpool, Sefton, and Wirral through comprehensive area based regeneration schemes;**
- **Supporting the development of the Mersey Ports and the maritime economy; and**
- **Sustaining investment in the Mersey Waterfront Regional Park.**

The emphasis will be on providing a good range of quality housing in the inner areas in terms of size, type, tenure and affordability with a high quality environment and accessible local facilities and employment opportunities.”

- 12.8 We have changed the title of this policy to accord with that used in MCR2, in response to a comment by GONW. Not only does this bring consistency, but we think it is more appropriate in this context to refer to the Regional Centre than to the City Centre. We have utilised rather more of the MPU text in this proposition but again left out some of the detailed references to sub-regional sites (we have not retained the reference to the Wirral Waterfront, which the Assembly had also proposed, but referred to the SIAs generically in Policy LCR1 – we were not clear why one site was referred to, and we were concerned that it might imply greater priority for that site as compared with others) and omitted some repetition in the transport field. We have, at the

suggestion of GONW (in Briefing Paper 9) imported some words on housing in the Regional Centre from the MCR policies.

12.9 We are again conscious of confusion as to the definitions of the “Regional Centre” and the “City Centre”. These terms were used interchangeably by most parties during the EiP. There will be different definitions for different purposes; the definition of the shopping centre is, for example, likely to be significantly more restrictive than that which relates to the location of knowledge nuclei sites. We use the term “Regional Centre” cautiously, acutely conscious of our lack of local knowledge, but note that MPU give a definition in a footnote on page 6 of their submission which NWRA found acceptable: “The whole of the area within the City Centre Strategic Investment Area and the Liverpool Vision URC Area, including the University Edge Knowledge Nuclei Site.” MPU give what appears to be a slightly different definition in paragraph 3.2.1 which makes clear that the retail area covers only part of the regional centre. We offer these to GONW to consider, noting that if MPU themselves are unable to bring clarity it is hardly reasonable to expect the Panel to do so, and that as MPU also point out the detailed definition needs to follow as part of the LDF.

12.10 Once again the MPU have supplied a reasoned justification, which is very much longer than the single paragraph in the draft RSS. Whilst it reads well and is unobjectionable we think it adds unnecessary detail and once again prefer to stick with the Assembly’s version on the grounds of brevity.

RECOMMENDATION

R12.3

We recommend that Policy LCR3 should read as follows:

“Policy LCR3 Northern Part of the City Region

In the remaining northern part of the City Region Plans and strategies should:

- **Focus economic development in locations which accord with the criteria set out in Policies W2 and W3;**
- **Support significant intervention in areas of low demand housing in line with the approach set out in Policies L3 and L4;**

- **Expand the quality and choice of housing in line with the approach set out in Policy L4;**
- **Maintain and enhance the roles of the regional towns, key service centres and local centres identified in accordance with Policy RDF2;**
- **Ensure that development in settlements in West Wirral (that part of the Borough to the west of the M53) and within West Lancashire District is linked to rural regeneration and local needs, is appropriate to the scale and function of each settlement, and is consistent with other regeneration programmes and policies.”**

12.11 With the exception of the final point (where the Assembly agreed that the MPU version was an improvement) we have generally employed the Assembly’s approach to this Policy. Once again we have omitted references to specific sub-regional employment sites and to specific transport schemes; and we have also left out the specific reference to economic development around the airport. This was the subject of some debate at the EiP, and there is already a major employment site near the airport, though it is largely committed. We would not support further employment development in that area, unless it is directly related to operational purposes, or otherwise meets our suggested criteria in Policies W2 and W3 in respect of the locations for future employment development.

12.12 We have endeavoured to bring the policy in line with the housing policies. We think that the MPU version carried the danger, in particular, of conflict with – or at least duplication of – paragraph 9.19. On the question of Key Service Centres we have referred back to our recommendation in Chapter 4 on Policy RDF2. The MPU in EIP/MPU/1 put forward, in an appendix, a proposed settlement hierarchy. This did not pass without comment – for example it was suggested that it should include Maghull and Crosby (but exclude Frodsham, which is within the Manchester City Region). We think this list might form a useful basis for the identification of KSCs through LDFs, and in the review of RSS where we have proposed that a review of KSCs based on the Land Use Consultants’ work should be undertaken.

12.13 Ellesmere Port is covered in both Policies LCR3 and LCR4, and this caused some debate at the EiP. In general Ellesmere Port and Cheshire seemed more than satisfied with this state of affairs, and indicated that the town had close links with both the

northern part of the City Region and with West Cheshire. We are content to accept this; the two references do not conflict and we recommend that they are retained.

- 12.14 In respect of the supporting text we come to the same conclusion as previously. We have no problem with either version, and in this case there is not much to choose in terms of length. On balance we recommend that the NWRA version, being more consistent in style and content with the rest of the draft RSS, should be preferred.

West Cheshire/North East Wales

- 12.15 In respect of Policy LCR4 the circumstances are somewhat different. During the course of the period since the draft RSS was published a non-statutory plan for the West Cheshire/North East Wales sub-region had been produced by a consortium of English and Welsh organisations and local authorities. RPG13 had recommended that such a study was carried out. The final version, which became available in October 2006, had been the subject of a public consultation exercise.
- 12.16 The Panel asked the Assembly to get together with the other organisations primarily involved and to produce a paper, agreed as far as possible, proposing changes to the draft RSS which would take on board the results of this important work. The result was NWRA Briefing Paper 27, which was produced by the Assembly with the Welsh Assembly Government, Wrexham County Borough, Flintshire County Council, Ellesmere Port and Neston Borough Council, Chester City Council, Cheshire County Council and Denbighshire County Council. Most of the recommendations were agreed by all parties but in some cases not all of the organisations supported the proposed changes and this was set out in Briefing Paper 27.
- 12.17 The Panel have already considered the role of Chester – see Chapter 5 - and we have concluded that further regionally significant economic development would be inappropriate there. We heard many arguments on this point during the debate on the Liverpool City Region – for example from CPRE calling for more restrictive policies and from NWDA, Paycause and others calling for higher levels of development, but heard nothing which led us to change our view. We have therefore modified the proposed Policy LCR4 in Briefing Paper 27 accordingly, and largely adopted the wording put forward by Cheshire CC in the first bullet point. Otherwise the proposed policy clearly has wide support.

RECOMMENDATION

R12.4

We recommend that Policy LCR4 should read as follows:

"Policy LCR4 West Cheshire – North East Wales

Plans and Strategies within the English areas of the West Cheshire – North East Wales sub-region should:

- **Support the role of Chester as a key sub-regional centre for employment, shopping, leisure, culture and tourism, whilst ensuring that any development is compatible with the conservation and enhancement of the historic City and its setting;**
- **Support the sustainable economic growth of Ellesmere Port through sustained and co-ordinated programmes for development and investment, with emphasis on developing its reputation for 'high tech' manufacturing, promoting diversification of the economy and improving the image and perception of Ellesmere Port;**
- **Support the regeneration and enhancement of the quality of life in Ellesmere Port and West Chester;**
- **Improve the internal and external transport links, in particular with North East Wales, in line with the priorities for transport investment set out in Policy RT9;**
- **Develop the role of Chester as a regional public transport interchange and gateway in line with Policy RT3;**
- **Enhance links between areas of opportunity and areas of need, including those regeneration areas served by the following transport corridors:**
 - **Wrexham – Bidston – Liverpool rail corridor;**
 - **Wrexham - Chester;**
 - **Route leading to the Flintshire Coastal Corridor and;**
 - **Other corridors radiating out from Chester, in particular the M56 and M53/A55, and links to Ellesmere Port and Broughton. The enhancement of road links does not imply the provision of additional capacity;**

- **Ensure the strategic planning and management of the sub-region's economy, housing market, transport network and environmental and cultural assets through joint working with Authorities and Agencies across the sub-region;**
- **Ensure the provision of housing to meet local needs and address barriers to affordability;**
- **Further develop the skills base of the labour force and promote access to employment; and**
- **Support and diversify the rural economy and improve access to services in the rural areas."**

12.18 The Assembly in Briefing Paper 27 propose two additions to the supporting text. We support these.

RECOMMENDATION

R12.5

We recommend that at the end of paragraph 13.11 the following should be inserted:

"Policy LCR4 only applies to Authorities and Agencies operating in the English areas of the sub-region but joint working across boundaries for the strategic planning and management of the whole sub-region are encouraged."

We recommend that the opening sentence of paragraph 13.12 should read as follows:

"The policy framework developed for Chester and Ellesmere Port has been informed by the development of a non-statutory sub-regional spatial strategy covering West Cheshire and North East Wales."

The second sentence should be deleted and a footnote should refer to the details of the study.

Other Matters Relating to Liverpool City Region

12.19 In their statement on this matter Peel Holdings pointed out some technical inaccuracies in the sub-regional diagram which should be taken into account in the revisions we have already proposed.

RECOMMENDATION

R12.6

In altering the sub-regional diagram as proposed in Recommendation 9.1 account should be taken of the technical inaccuracies pointed out by Peel Holdings in their statement on Matter 8.

CHAPTER 13 CENTRAL LANCASHIRE CITY REGION

- 13.1 In Chapter 14 of the draft RSS Policies CLCR1 to CLCR3 deal with the Central Lancashire City Region. We have already set out the general arguments about the validity and utility of the city region concept as applied to Central Lancashire, in Chapter 4 of our Report. It is not necessary to go over this ground again. Our conclusion, expressed there, is that the Central Lancashire City Region should be one of the basic components of the RSS; that it consists of four main units, based on Blackpool, Preston, Blackburn and Burnley; and that these should be developed as relatively self-contained entities, where jobs and services are provided locally.
- 13.2 Specific modifications to Chapter 14 of the draft RSS were suggested in NWRA's Briefing Paper 20, and in written statements submitted by the Lancashire CC; by Blackpool Council; by Blackburn with Darwen BC; by North West Environmental Link (NWEL); and jointly, by local authorities for the "Central Lancashire City" of Preston, South Ribble and Chorley.

Priorities

- 13.3 Policy CLCR1 of the draft RSS brings together the priorities for the Central Lancashire City Region. The Assembly have suggested a number of minor alterations to this policy, most of which are concerned with the accuracy of cross-references, or the deletion of material that duplicates policy contained elsewhere in the Plan. These are uncontroversial.
- 13.4 The first main bullet point in Policy CLCR1 indicates that plans and strategies should raise economic performance, for instance through "implementation of the Preston City Vision." This causes us concern. The RSS will be part of the statutory development plan, and Local Development Frameworks (LDFs) will have to comply with it. The implication of Policy CLCR1 is therefore that the relevant LDFs must implement the Preston City Vision. The content of the Preston City Vision is not specified in the draft RSS. Furthermore, it is not subject to the statutory requirements for strategic environmental assessment, sustainability appraisal, or public scrutiny that apply to the development plan.
- 13.5 It is possible that objections might be made to the relevant LDFs, and particularly to policies that would have the effect of implementing the Preston City Vision. An Inspector would have

to consider such objections, and might conclude that the policies in question should be deleted from a LDF. But, unless Policy CLCR1 is amended, deletion of this material might affect the LDF's conformity with the RSS, and therefore its soundness.

- 13.6 We do not consider it appropriate that the RSS should include an open-ended commitment that the unspecified and unknown content of a non-statutory document should be incorporated into the statutory development plan. The same considerations apply to other non-statutory documents cited in the draft RSS, such as the Blackpool Masterplan.
- 13.7 Blackburn with Darwen BC referred to evidence suggesting that improved skills would be an important factor in raising the sub-region's economic performance. They considered that Policy CLCR1 should refer to an expansion of higher education facilities, which would contribute to the acquisition of these skills. We accept their argument.
- 13.8 The second and third bullet points in Policy CLCR1 refer to the broad locations for regionally significant economic development identified in Table 8.1 (Policy W2) of the draft RSS; and to the sub-regional employment opportunities described in Policy W3. We consider that these bullet points should be merged and modified, in accordance with our recommendations in respect of Policies W2 and W3, and Table 8.1. We consider that efforts should be made to address localised problems of worklessness, particularly in the Fylde Peninsula and East Lancashire.
- 13.9 The fourth bullet point in Policy CLCR1 concerns transport improvements. A number of participants thought it insufficiently detailed, and suggested the introduction of a new City Region Transport Strategy, as an additional policy. We do not consider that it would be appropriate to propose additional transport interventions in Chapter 14 of the RSS, which are not already listed in Table 10.2. Nor do we think it necessary that the interventions specified in Table 10.2 should be repeated in Part 4 of the RSS, which deals with the sub-regions.
- 13.10 We have considered the amendment to the fourth bullet point proposed by the Lancashire CC. This would prioritise enhanced connectivity within the Central Lancashire City Region. Blackpool, Preston, Blackburn and Burnley are already linked by rail and by motorway, although there is evidence of peak period congestion on parts of the M6 and the M65, and on rail services in Central Lancashire. However, the evidence is that movement from parts of East Lancashire to the Manchester City Region is

greater than movement westwards through the Central Lancashire City Region.

- 13.11 We understand that consultants have been appointed to examine the feasibility of improving the train service between Blackpool and Yorkshire. However, this is listed as a second priority intervention in Table 10.2 of the draft RSS. The transport priority assessments made by Atkins (in connection with the RFA) and JMP Consulting (for the RSS) give a higher priority to more localised public transport improvements within the Central Lancashire City Region, and we have no reason to disagree. Examples are the East Lancashire Rapid Transit, based on Blackburn (which is within the RFA, with a likely start date of 2008/9); the investigation of improved rail access between East Lancashire and Manchester (listed as a first priority intervention in Table 10.2 of the draft RSS); and the improvement and extension of the Blackpool and Fleetwood Tramway (also listed as a first priority intervention in Table 10.2).
- 13.12 The fourth bullet point in Policy CLCR1 includes a cross-reference to these priorities for transport investment. In our view, the introduction of a separate transport strategy for the Central Lancashire City Region would be confusing, and would either repeat, or be inconsistent with, the priorities established elsewhere in the RSS. For these reasons, we do not support it.
- 13.13 The final bullet point in Policy CLCR1 concerns improvements to the accessibility of employment locations. We accept the point made by NWEL that this should refer to accessibility “by sustainable transport modes.”
- 13.14 We consider that the priorities for the Central Lancashire City Region should include the provision of a range of good quality housing (in terms of the type, size, tenure and affordability of dwellings). New building and the refurbishment of the existing housing stock will both contribute this. We are encouraged by the progress that is being made in East Lancashire under the Elevate Housing Market Renewal Initiative, but recognise the need for action elsewhere in the City Region.

RECOMMENDATION

R13.1

Policy CLCR1 – Central Lancashire City Region Priorities

Policy CLCR1 should read as follows:

“Plans and strategies for the Central Lancashire City region should:

- **raise economic performance, particularly through:**
 - **tourism-based regeneration in Blackpool;**
 - **knowledge-based development (including advanced manufacturing and aerospace) in Preston and Blackburn;**
 - **regeneration and restructuring of the East Lancashire economy (including actions taken under the Elevate Transformational Agenda);**
 - **enhanced educational opportunities which will improve the skill-base of the resident population;**
 - **develop new employment opportunities in accordance with Policies W1 to W3, and address localised problems of worklessness;**
- **provide for a range of good quality housing, accessible to local facilities;**
- **improve the City Region’s internal and external transport links, in line with the transport investment and management priorities set out in Policy RT9;**
- **develop the role of Blackpool Airport, in line with Policy RT5;**
- **develop the role of Preston as a regional transport gateway and interchange in line with Policy RT3;**
- **improve the accessibility of employment locations by sustainable transport modes, with priority given to the Elevate Housing Renewal Pathfinder area.**

Proposals and schemes will be directed primarily towards locations where they can contribute to these priorities.”

The Role of Greater Preston

- 13.15 Much of the discussion in the session of the EiP that concentrated on the Central Lancashire City Region focussed on the role of the urban area of Preston, South Ribble and Chorley. This was described by some participants as the “Central Lancashire City”. However, we prefer the term “Greater Preston” to describe this area. This is because the term “Central Lancashire City” suggests that the area in question dominates (and lends its name to) the Central Lancashire City Region. This runs counter to the argument (which we accept) that the Central Lancashire City Region has an essentially polycentric structure, based on its four main settlements (Blackpool, Preston, Blackburn and Burnley). Each of these has a distinctive character and role, but we consider them to be of broadly equivalent status.
- 13.16 In this connection, we understand that each of these four settlements has relatively self-contained travel to work and shopping catchment areas. The Ecotec study, commissioned by GONW, identified a separate Housing Market Area around each of the settlements. There is no suggestion that there is a higher level housing market area, radiating out across the Central Lancashire City Region from Preston, corresponding to the higher level housing market areas identified in the Manchester and Liverpool City Regions.
- 13.17 In terms of travel, we were given evidence that the main desire for movement from parts of East Lancashire is toward Manchester, rather than toward Preston. We also understand that a considerable proportion of the movement to and from Preston is along the M6/West Coast Mainline Corridor, linking with the Manchester and Liverpool City Regions, rather than with other parts of the Central Lancashire City Region.
- 13.18 It is against this background that we have considered the arguments, raised by a number of participants, to the effect that Preston should be designated as a regional centre. We acknowledge Preston’s role as a focus for industry and commerce; as a centre of public administration and higher education; as a thriving shopping area, with good leisure and cultural facilities; and as a regionally important public transport interchange. Nevertheless, we do not consider it to be a regional centre of equivalent stature to Manchester or Liverpool, either in terms of the scale and the range of facilities it offers, or in terms of its dominance over (or interaction with) the remainder of the City Region of which it forms part. As

indicated in Chapter 4 above, we do not consider that there is a case for changing Preston's position in the settlement hierarchy proposed in the draft RSS. Nor do we accept the need for a new policy for "the Regional Centre" along the lines suggested jointly by Preston, South Ribble and Chorley Councils.

Focus for Growth

- 13.19 Policy CLCR2 of the draft RSS provides that development in the Central Lancashire City Region should be located primarily in Blackpool, Preston, Blackburn, and Burnley. Within these urban areas development should be concentrated in accordance with the priorities set out in Policy RDF1 (that is within the city and town centres, and at other points where there is good accessibility by public transport).
- 13.20 We accept that there will be a need to define the extent of the four growth areas. For this purpose, paragraph 14.8 indicates that Blackpool is part of an urban area that includes Fleetwood, Thornton, Cleveleys and Lytham St Annes; that Preston has strong linkages with suburban areas south of the Ribble; that the urban area of Blackburn includes Wilpshire and Whitebirk; and that the urban area centred on Burnley extends from Padiham, through Brierfield to Nelson and Colne. We do not consider that this need be spelt out in Policy CLCR2. In our view, the precise boundaries of these urban areas should be defined in LDFs.
- 13.21 However, we do consider that the RSS should spell out the distinctive character and potential of each of the four main urban areas. We have used the material suggested to us by various local authorities to recommend an additional paragraph in the supporting text.

RECOMMENDATION

R13.2

Policy CLCR2 – Focus for Growth in the Central Lancashire City Region

The following paragraph should be inserted after paragraph 14.8 of the draft RSS:

“Policy CLCR2 builds on the identified strengths and opportunities of each centre, which are as follows:

BLACKPOOL

- **Major tourist centre with potential for casino and conference development;**
- **Need for economic growth to underpin urban restructuring;**
- **Focal point for coastal housing market renewal;**
- **Specialist medical services centred on Blackpool Victoria Hospital;**
- **Centre for retailing, services, public administration and further education;**
- **Public transport hub for the Fylde Peninsula;**
- **Airport with potential for increased use.**

PRESTON

- **Focal point at the intersection of north-south and east-west transport corridors;**
- **Centre for culture, leisure and quality city living;**
- **Established advanced engineering and aerospace industries;**
- **Centre of public administration, justice and financial services;**
- **University of Central Lancashire, with links to knowledge-based business;**
- **Specialist medical services centred on Royal Preston Hospital;**
- **Regional public transport gateway and interchange;**
- **Higher order retailing and services.**

BLACKBURN

- **Focal point for economic growth and restructuring in East Lancashire;**
- **Established advanced engineering and aerospace industries;**

- **Focal point for Elevate Housing Market Renewal Initiative;**
- **Specialist medical services centred on Queen’s Park Hospital;**
- **Centre of higher and further education, public administration and justice;**
- **Transport hub;**
- **Retail and service centre.**

BURNLEY

- **Focal point for economic restructuring;**
- **High value manufacturing;**
- **Focal point for Elevate Housing Market Renewal Initiative;**
- **Heritage-based regeneration along canal corridor and in Weaver’s Triangle;**
- **Specialist medical services centred on Burnley General Hospital;**
- **Further education centre;**
- **Public transport hub;**
- **Retail and service centre for Pennine Lancashire;**
- **Centre of public administration.”**

Other Parts of the Central Lancashire City Region

13.22 Policy CLCR3 of the draft RSS deals with development in other parts of the Central Lancashire City Region outside the Regional Towns and City. It indicates that development in settlements should be appropriate to their scale and function; and that the role of these settlements will be defined in LDFs, having regard to Policy RDF2. We consider that development outside the Regional Towns and City should be concentrated in KSCs and Local Service Centres, as indicated in our recommended revision to Policy RDF2. For the avoidance of doubt, Policy CLCR3 should make this clear. We note that some of the settlements in question are substantial towns. For instance, they include Accrington, Chorley, Leyland and Rawtenstall, each of which is designated as a KSC, and each or which could accommodate a moderate amount of development.

RECOMMENDATION

R13.3

Policy CLCR3 – Development Other Parts of the Central Lancashire City Region

The first sentence of Policy CLCR3 should be replaced as follows:

“Outside the Regional Towns and City identified in Policy CLCR2, development in the Central Lancashire City Region will be largely confined to Key Service Centres and Local Service Centres, and will be appropriate to the scale and function of each settlement. Elsewhere, development will be limited in accordance with Policy RDF3. ”

- 13.23 However, we do think that the RSS should emphasise the potential of the attractive rural areas that surround many of the settlements in Central Lancashire, and that these areas should be protected and enhanced. The proximity of high quality countryside is one of the City Region’s greatest assets, and one of its defining features. In addition to Green Belt land, the City Region includes part of the Forest of Bowland Area of Outstanding Natural Beauty. A Regional Park has been designated in East Lancashire, which extends into the Pennines. Others are planned for the Ribble Estuary and Morecambe Bay (the latter extending outside the City Region into North Lancashire). NWEL drew our attention to the recreational and amenity potential of corridors of open land alongside waterways, such as the Leeds-Liverpool Canal. Burnley Council also mentioned this, and drew our attention to the area’s historic parks.
- 13.24 A number of participants, including NWRA, considered that an additional policy should be included in Chapter 14 of the RSS, to highlight the “Green City” concept, and the contribution made to the quality of life by the City Region’s extensive rural areas and urban spaces. We agree. We have considered the proposals put forward for the supporting text for such a policy. As the topics of Green Belt, Regional Parks and Green Infrastructure are covered in some depth in earlier chapters of the draft RSS, we consider that a brief explanation will suffice here, and avoid undue repetition.

RECOMMENDATION

R13.4

Additional Policy CLCR4 – Green City

An additional policy (Policy CLCR4 – Green City) should be added to Chapter 14 of the RSS, as follows:

“The unique ‘green’ character of the Central Lancashire City Region, and the advantages it offers for recreation and for attracting people and investment, will be protected and further enhanced by:

- a) maintaining the extent of the Green Belt in accordance with Policy RDF5;**
- b) protecting the Forest of Bowland AONB, in accordance with Policy EM1;**
- c) the further development of the City Region’s three Regional Parks (East Lancashire, Ribble Estuary and Morecambe Bay) in accordance with Policy EM4, through:**
 - improving access to open space networks, enhancing the urban fringe, reclaiming derelict land, enhancing recreational and educational facilities, and providing public art;**
 - promoting the conservation, protection and enhancement of the physical and natural environment, and supporting biodiversity; and**
 - the inclusion of appropriate policies and projects, and the delineation of Regional Park boundaries in Local Development Frameworks;**
- d) the greening of urban areas, through measures including the renovation of existing parks; the reclamation of derelict land for ‘soft’ end uses; the utilisation of open space adjacent to waterways, such as the Leeds-Liverpool Canal; and the creation of green wedges extending into the countryside.”**

The following supporting text should follow Policy CLCR4:

“One of the strengths of Central Lancashire’s polycentric growth is the potential to maximise the benefits offered by the close proximity of high quality countryside and environmental assets to a large proportion of the population – the ‘Green City’ concept. The Green Belt, the Forest of Bowland AONB and the Regional Parks will form important elements in the City Region’s green infrastructure, together with improved green spaces in urban areas.”

Business Sites

- 13.25 A number of participants sought the inclusion of an additional policy in Chapter 14 of the RSS, which would identify certain sub-regional business sites. Specific proposals included the expansion of the BAe Site at Samlesbury; the proposed Blackpool/Fylde Employment Hub at Junction 4 on the M55; and the Hillhouse Site at Fleetwood. However, the RSS is not site specific. In our view, it should be for LDDs to identify sites for business development, in accordance with the policy framework provided by the RSS.

CHAPTER 14 CUMBRIA AND NORTH LANCASHIRE

14.1 Chapter 15 of the draft RSS deals with Cumbria and North Lancashire. There was some dispute as to whether this should be treated as a single sub-region. It is a diverse and extensive area. Cumbria alone accounts for almost half the land area of the North West, though it has only about 7% of the region's population. North Lancashire, which consists of the administrative area of the Lancaster City Council, includes a large area of sparsely populated countryside. Nevertheless, there are clearly strong functional ties between Cumbria and North Lancashire; and these different administrative units share a number of characteristics, problems and opportunities in common. We consider it appropriate they should be treated as a single sub-region. Having said that, Chapter 15 of the draft RSS consists of separate policies for Cumbria, the Lake District, and North Lancashire.

The West Cumbria Masterplan

- 14.2 A day or two before the Cumbria and North Lancashire Sub-Region was discussed at the EiP, we received late representations arising from the West Cumbria Masterplan, which had just been completed for publication. The Masterplan has been prepared by the West Cumbria Strategic Forum at the request of the Secretary of State for Trade and Industry, and is to be submitted to the Prime Minister. Its purpose is to identify transformational initiatives that will underpin the economic, social and environmental well-being of West Cumbria, particularly in the light of the decommissioning of the nuclear installation at Sellafield and the consequent reduction in employment.
- 14.3 The Masterplan is not part of the statutory Development Plan. At the time of the EiP, it was about to be the subject of public consultation. It had not been the subject of a SA or SEA. Nor had it been submitted to Ministers. The weight that we attach to it reflects these considerations.
- 14.4 The representations arising from the Masterplan contained some general comments, and proposed a series of detailed amendments to the draft RSS. The first general comment was that West Cumbria should be designated as a Regeneration Priority Area (RPA). Both West Cumbria and the Furness Peninsula are shown as RPAs in RPG13. We note the view of NWRA that this designation could have negative connotations. It is not included in the draft RSS, having in some cases been

superseded by the Housing Market Renewal Pathfinders. But we recognise the serious economic problems that continue to beset these two relatively isolated areas of Cumbria. On balance, we consider that they should continue to be recognised as RPAs.

- 14.5 The second general comment was that the RSS should be the subject of “West Cumbria proofing”. We understand this to mean that a conscious effort should be made to consider the implications of RSS policy for West Cumbria. We agree with that approach.

Spatial Policy for Cumbria

- 14.6 Policy CNL1 is an overall spatial policy for Cumbria. For the avoidance of doubt, NWRA explained that it contains nine bullet points. As the result of a typographical error, the last five of these were excluded from the highlighting that differentiates policies from other text in the draft RSS.
- 14.7 The first bullet point makes provision to focus major development in Barrow, Carlisle and West Cumbria (where it specifies Whitehaven, Workington, Cleator Moor and Maryport). We consider that reference should be made here to the Furness and West Cumbria RPAs. However, we do not support the view, advocated by the authors of the West Cumbria Masterplan, that major development should be concentrated in relatively small KSCs, such as Aspatria, Millom and Egremont. The second bullet point of Policy CNL1 explicitly provides for only moderate development in those centres, while the third bullet point provides for small scale development in Local Service Centres.
- 14.8 We have considered the argument that Policy CNL1 should also make provision for major development in Kendal and Penrith. In our view, these are properly shown as KSCS, in which moderate development to meet local needs would be appropriate.
- 14.9 We consider that the fourth bullet point in Policy CNL1 should be amended to reflect our conclusions in respect of Policy W2 and Table 8.1 of the draft RSS. We propose no change to the fifth bullet point, which concerns the restructuring of housing markets in West Cumbria and Furness.
- 14.10 There was considerable discussion of the sixth bullet point in Policy CNL1, which relates to improvements to Cumbria’s transport links in line with the investment priorities set out in Table 10.2 of the draft RSS. Paragraph 15.7 of the draft RSS

acknowledges the need for additional transport investment in West Cumbria, but the view was expressed that this was not adequately translated into firm proposals. The West Cumbria Masterplan seeks the upgrading of the A66 west of the M6; the upgrading of the A595 between Carlisle and Barrow; and the improvement of the Cumbrian Coastal Railway. With the exception of the partial upgrading of part of the A595 between Parton and Lillyhall (which is scheduled to have begun) no schemes for these routes are included in the transport investment priorities listed in Table 10.2. For the reasons set out in Chapter 7 above, we do not propose any change in the priorities shown in that Table. However, the question of improved access to West Cumbria should be a subject for consideration at a future review of the RSS.

- 14.11 Since the A595 upgrading entails the creation of a dual carriageway, which would cater for motor traffic, we do not consider that it would be appropriate to insert a reference to “sustainable modes” in the sixth bullet point of Policy CNL1, as sought by CPRE. We do not propose any change to this bullet point, other than to update a cross-reference.
- 14.12 We note that the eighth bullet point in Policy CNL1 proposes network management measures to improve road safety and journey time reliability, and gives priority to improving the operation of routes linking Furness and West Cumbria with the M6. We support this.
- 14.13 The final bullet point in Policy CNL1 concerns improved access by sustainable transport modes to employment, educational facilities and other services, especially in Carlisle and Barrow-in-Furness (which it incorrectly describes as “Key Service Centres”) and Kendal. We consider that the reference should be to the Regional Towns and Cities (which we recommend should include Workington/Whitehaven) and KSCs.
- 14.14 CPRE argued that further bullet points should be added to Policy CNL1, to deal with environmental and rural issues. However, we consider the points they raised to be of general application, rather than specific to Cumbria. They are dealt with in our recommended Policy DP7 and do not require repetition.
- 14.15 The Cumbria Tourist Board felt that Policy CNL1 should make specific reference to tourism in Cumbria. We agree. This is already an important source of employment, which makes a significant contribution to Cumbria’s GVA. There is plainly potential to increase its role.

RECOMMENDATION

R14.1

Policy CNL1 – Overall Spatial Policy for Cumbria

The whole of Policy CNL1 (including its 9 bullet points) should be distinguished from the supporting text.

The first bullet point should be amended to read:

“Focus major developments within the Regeneration Priority Areas of Barrow-in-Furness and West Cumbria (Whitehaven, Workington, Cleator Moor and Maryport); and in the Regional City of Carlisle.”

The fourth bullet point should be amended to read:

“Provide a portfolio of employment sites in accordance with the criteria in Policies W2 and W3.”

In the fifth bullet point, “RT8” should read “RT9”.

The ninth bullet point should be amended to read:

“Give priority to improving access to employment, services and education/training facilities on foot, by cycle and by public transport, in the Regional Towns and Cities of Carlisle, West Cumbria and Barrow-in-Furness, and in Key Service Centres, especially Kendal.”

An additional bullet point should be inserted, to read:

“Support the development of tourism in Cumbria.”

The following sentence should be added at the end of the policy:

“Proposals and schemes will be directed primarily towards locations where they can contribute to these priorities.”

Development Priorities for Cumbria

- 14.16 Policy CNL2 deals with development priorities in sub-areas of Cumbria. The first bullet point deals with Carlisle, identifying its role as a sub-regional centre. However, we understand that its influence extends into Scotland and North East England, and we consider that this should be acknowledged. Although reference is made to Carlisle as a centre of higher education, we consider that the establishment of the new University of Cumbria will give rise to the potential for knowledge-based economic activity in the City, and that this should be emphasised.
- 14.17 The second bullet point deals with West Cumbria. We consider that this should refer to the RPA, and the potential offered by local expertise in the field of nuclear research and development, including the presence of the National Nuclear Laboratory. The location of part of the University of Cumbria in this area could also increase its potential for the development of a knowledge-based economy. There may well be potential for tourism development in West Cumbria. For instance, centres such as Cockermouth lie immediately adjacent to the Lake District National Park. It is clear that investment will be needed to offset the expected decline of employment at Sellafield, as the decommissioning of the nuclear installation there proceeds.
- 14.18 The third bullet point in Policy CNL2 provides for the economic diversification of Barrow and the Furness Peninsula. We were told of the specialist marine engineering skills among Barrow's workforce; and of plans for redevelopment in Barrow Docks, that could support a marina and a cruise terminal. There was also a suggestion that Barrow has potential for the development of knowledge-based industry, but it is not immediately obvious that it would be better able than other places to attract the necessary investment. We accept that there may be scope for tourist development in this part of Cumbria, for instance in Ulverston, which lies close to the edge of the Lake District. We consider that the policy should refer to the RPA.
- 14.19 The fourth bullet point in Policy CNL2 concerns South and East Cumbria. It provides for Kendal and Penrith to act as centres for inward investment. We see no inconsistency between this and the identification of the two towns as KSCs where moderate development would be appropriate. It will be for LDDs to define the potential scale of the inward investment with more precision, within the context of the various RSS policies that apply. The inward investment might well include the development of tourist facilities. There was a suggestion that

Kendal has potential for the development of knowledge-based industry. In this connection we note its good position in relation to the transport network and its attractive environment. However, we would not expect the scope for knowledge-based development there to be as great as in the Regional Cities of Carlisle and Lancaster, where there are substantial and developing higher educational facilities.

- 14.20 The bullet point also highlights the need for affordable housing in South and East Cumbria. It was suggested that it should also refer to general market housing, but we do not consider such an amendment necessary. The quantity of housing to be provided in South Lakeland and Eden is set out in Table 9.1 of the draft RSS, which we deal with in Chapter 6 of this report. We do not consider that any change should be made to the fourth bullet point in Policy CNL2.

RECOMMENDATION

R14.2

Policy CNL2 – Sub-area Development Priorities for Cumbria

The second sentence in the first bullet point in Policy CNL2 should be replaced by the following:

“The city will enhance its role as a sub-regional centre for business, shopping, leisure, culture and tourism, serving Cumbria and the adjoining parts of Scotland and North East England. It will also develop its higher education function through the establishment of the new University of Cumbria, which should help attract investment in the knowledge-based economy. Due regard should be paid to the conservation of the historic city centre.”

The second bullet point in Policy CNL2 should be replaced with the following:

“Enhancing the Regeneration Priority Area of West Cumbria, through developing the roles of the existing centres of Whitehaven, Workington, Cleator Moor and Maryport in a complementary manner. Efforts should be made to exploit the potential offered by a local workforce with expertise in the field of nuclear research, development and decommissioning; and the presence of the National Nuclear Laboratory. The location of part of

the University of Cumbria in this area could increase its potential for the development of a knowledge-based economy. The potential of the area for tourism-based development should also be explored.”

The third bullet point in Policy CNL2 should be replaced by the following:

“Concentrating development within the Furness Regeneration Priority Area in Barrow, to facilitate diversification of the local economy, and enable opportunities for development and regeneration to be brought forward in the wider Furness Peninsula. Efforts should be made to exploit specialist marine engineering skills and opportunities, and to develop the area’s potential for tourism. ”

Spatial Policy for the Lake District

- 14.21 Policy CNL3 of the draft RSS deals separately with the Lake District. GONW were opposed to a separate policy for the National Park. They told us that such policies had not been included in other regions where there were National Parks. However, it seems to us that the Lake District National Park has statutory purposes, which do not apply generally in the North West, and to which regard must be had in the development of strategic planning policies. We consider it appropriate that it should be subject of a specific policy in the RSS.
- 14.22 Alternative formulations of Policy CNL3 were submitted by NWDA and by the Lake District National Park Authority. NWDA considered the National Park to be an administrative rather than a functional area. They argued that the policy should apply across a wider area. Among other things, their proposed policy would encourage knowledge-based industry in Kendal, and tourism and recreational development around Penrith, Ulverston and Cockermouth. However, each of these towns is outside the National Park. They fall respectively in the South and East Cumbria, Furness, and West Cumbria areas that are explicitly dealt with in Policy CNL2. We see no need to go over this ground again.
- 14.23 NWDA’s proposed policy would include provision for a supply of employment land in the National Park, to encourage economic diversification, including the growth of knowledge-based

businesses. We recognise the need to foster the economic and social well-being of people who live within the park. But it seems to us that the provision of employment land to meet their needs is a matter best dealt with locally by the National Park Authority. It is unlikely to be on a scale that is of regional significance, particularly if the purpose of conserving the natural beauty and cultural heritage of the Lake District is to be met.

- 14.24 NWDA's proposed policy also referred to the provision of general market housing across the wider Lake District. However, the proposed housing provision for the National Park and each of the adjoining districts is set out elsewhere in the RSS. We have seen nothing to suggest that the "wider Lake District" constitutes an identifiable housing market area, either in the Ecotec Study or in the work undertaken by the Cumbrian authorities. In our view the introduction of a reference to such an area is likely to confuse the delivery of housing policy.
- 14.25 Both NWDA and the National Park Authority considered that Policy CNL3 should encourage investment in KSCs within the National Park (Windermere/Bowness, Ambleside and Keswick), either to support their tourist roles, or to secure economic regeneration. We have concluded in Chapter 4 of this Report that development should be permitted in these centres only if certain criteria are satisfied. While limited investment may well be beneficial, we do not consider that unrestricted encouragement should be given to development in these settlements as a matter of policy.
- 14.26 Both NWDA and the National Park Authority proposed that Policy CNL3 should encourage high quality design, which promotes local distinctiveness and is sensitive to its context. We agree, but consider this to be a general principle which should apply throughout the North West. The matter is covered in our proposed Policy DP6. Repetition is unnecessary.
- 14.27 Both NWDA and the National Park Authority propose that Policy CNL3 should provide for the management of recreational and tourist activities in suitable locations in the National Park. We consider that this would be consistent with the purpose of promoting opportunities for the understanding and enjoyment of the National Park by the public, and agree that the policy should be amended accordingly.
- 14.28 The National Park Authority proposed that Policy CNL3 should include provision to address the relationship between the National Park and the surrounding area, so as to provide a

framework whereby some of the locally generated needs that arise within the Park can be met by outside. This seems to us to be reasonable.

14.29 The National Park Authority also proposed that Policy CNL3 should promote the National Park as an exemplar of sustainable development. We consider that the principles of sustainable development should apply generally as a matter of policy. Whether the Lake District is to be an exemplar depends upon the extent to which those principles are followed in practice.

14.30 CPRE considered that protection of the Lake District's unique landscape and cultural heritage should set the context for Policy CNL3. This reflects one of the statutory purposes of the National Park. We agree that it should be given priority.

RECOMMENDATION

R14.3

Policy CNL3 – Spatial Policy for the Lake District

Policy CNL 3 should read:

“Plans and strategies should give priority to the protection of the landscape and cultural heritage of the Lake District National Park.

In addition they should:

- **Promote further diversification of its economic base;**
- **Redress housing imbalances through the provision of affordable and local needs housing in accordance with Policies L4 and L5;**
- **Develop programmes for improvements to the public realm and effective traffic management in Windermere, Ambleside and Keswick, to enhance the urban fabric and support their recreational and tourism roles;**
- **Manage recreational and tourist activities, in suitable locations;**
- **Ensure that public transport services are improved and better integrated, and that the proportion of travel to and within the National Park by sustainable modes is increased; and**

- **Address the relationship of the National Park with its wider area, and develop a suitable framework for meeting locally generated needs.”**

North Lancashire

- 14.31 Policy CNL4 of the draft RSS deals with North Lancashire. It contains a reference to “the broad location for knowledge nuclei employment identified in Table 8.1 (Policy W2).” We consider that this should be deleted, in accordance with our recommendations to delete Table 8.1 and modify Policy W2. In the fifth bullet point of this policy, the reference to “Policy RT4” should be changed to “Policy RT6”, to reflect the renumbering of policies in line with the Assembly’s suggested amendments.
- 14.32 Lancashire County Council considered that Policy CNL4 should be expanded “to ensure that rural communities are viable and vibrant, with improved access to affordable housing, employment opportunities and public transport.” We have concluded elsewhere that development in rural areas (including affordable housing and employment) should be largely confined to defined service centres. While our attention was drawn to the enterprising spirit of rural people in parts of this sub-region, it is not sustainable to plan for significant new housing or employment opportunities in remote and relatively inaccessible villages and hamlets. To do so would plainly increase the need to travel, particularly by car. Improved access to public transport would clearly be of benefit in many rural areas. However, resources for investment in improved public transport services are limited, and such investment is likely to be most cost effective in more densely developed areas. We consider that Lancashire County Council’s proposed addition to Policy CNL4 would be unrealistic, and would be contrary to the spatial development principles that should underpin the RSS.
- 14.33 GONW considered that more emphasis should be given to the growth opportunities offered by Lancaster. However, the second and third bullet points in Policy CNL4 already deal with this, referring additionally to the historic character of the City and the opportunities provided by its University. We consider this to be sufficient.
- 14.34 We consider that the fourth bullet point in Policy CNL4 should provide for a general increase in the supply of affordable housing, rather than concentrating exclusively on the rural area.

RECOMMENDATION

R14.4

Policy CNL4 - Spatial Policy for North Lancashire

The words “and the broad location for knowledge nuclei employment identified in Table 8.1 (Policy W2)” should be deleted from the third bullet point of Policy CNL4.

The fourth bullet point of Policy CNL4 should read:

“Ensure an increase in the supply of affordable housing.”

In the fifth bullet point of Policy CNL4, “RT6” should be substituted for “RT4.”

CHAPTER 15 DELIVERY, MONITORING, IMPLEMENTATION AND REVIEW

Background

- 15.1 Chapter 17 of the draft RSS contains supporting text outlining the RSS implementation, monitoring and review process. Further information and guidance on the implementation and monitoring of the RSS is contained in the draft Implementation Framework, which was produced alongside the draft RSS.
- 15.2 National guidance on implementation, monitoring and review of RSS is contained in Chapter 3 of PPS11, RSS Monitoring: a good practice guide (ODPM 2005), and Core Output Indicators for Regional Planning (ODPM March 2005).

Issues

- 15.3 Many of the issues that were raised during this session of the EiP (Matter 11) covered topics that were debated in earlier sessions. We have covered those issues in the appropriate sections of our Report, concentrating in this chapter on any outstanding and overarching issues we have not yet covered. The main issues that arose from the statements received, and the EiP session were:
- whether the draft RSS could be improved in terms of its clarity;
 - whether Chapter 19 adequately provides for the transition from Structure Plans to the LDF system;
 - whether the delivery and implementation mechanisms are appropriate;
 - whether the framework is in place to ensure effective monitoring; and
 - whether there is a need for an early review of the RSS.

Clarity of the RSS

- 15.4 Chapter 3 of our Report deals with issues that were raised regarding the structure of the draft RSS; how the vision is set out; where the sub-regional sections should be positioned in the RSS; and where the spatial principles and thematic objectives should be placed. We do not repeat these issues here, and focus instead on the “readability” of the draft RSS.

- 15.5 Having now used the draft RSS over the course of our involvement in this EiP (having it by our side constantly), we still struggle with locating various policies, topics, and tables when called upon to find something quickly. This indicates to us that improvements could be made to make the document more “user friendly” and easier to navigate. Various points were raised during the EiP in this respect; the need for an Executive Summary; the overall layout of the draft RSS; and the thematic chapters and their content.

Executive Summary

- 15.6 GONW suggested that one way to improve the clarity of the RSS might be to include an Executive Summary. NWRA considered that Chapter 5 of the draft RSS acts to some extent as an Executive Summary already, and the text in this could be taken out and used if required. We do not consider this necessary, and suggest that this text remains in its current position – though it might be highlighted more clearly. The draft RSS at present is not unduly long, and the addition of an Executive Summary might create undue confusion and inconsistencies.

Overall Layout

- 15.7 Cheshire CC and others called for improvements to be made to the draft RSS in terms of its layout and appearance, and like us, considered it difficult to navigate around. We agree with their suggestion that colour coding the various sections of the report would help with navigation around the document, as would an improved table of contents at the start of the document, indicating where the individual policies can be found and their page number. Including the appropriate chapter title within the heading of each page would also help with the navigation.
- 15.8 We also recommend that the South Cheshire sub-regional section of the RSS be moved so it follows on from the Manchester City Region chapter. This would seem to be the appropriate order for the sub-regional policy frameworks, given the geographical links between the two sub-regions.
- 15.9 We have recommended elsewhere that more maps and plans be included within the RSS, which we consider will help break up the text and improve the document’s readability.
- 15.10 One further change that we suggest concerns Chapter 11- Enjoying and Managing the North West. This chapter contains a wide variety of topics, including issues relating to the landscape,

water, minerals and waste, and energy. We feel that at present the title of this chapter does not convey its content clearly, although we understand NWRA's problems of trying to put together such wide ranging issues under one heading. We considered separating out the issues into separate chapters, but the result would be three or four small chapters, some of which would contain only a couple of policies. We therefore conclude that the chapter should stay as it is at present, although consideration should be given to renaming it to better relay its content. In this instance a more descriptive title may help with understanding the content of the chapter. We recommend accordingly.

Cross Referencing

15.11 There were a few requests throughout the EiP sessions that the cross-referencing within the RSS policies should be improved, with more references linking relevant policies. Paragraph 1.3 of the draft RSS notes that "cross-referencing ... has been kept to instances where explicit linkages need to be highlighted." In this respect we consider that the draft RSS is sufficient at present. Too many cross-references would make the RSS confusing to the reader, and as is noted in paragraph 1.3 of the draft RSS "RSS must be read as a whole."

RECOMMENDATION

R15.1

Improve the clarity of the document by:

- **Colour coding the various sections of the RSS;**
- **Inserting within the table of contents details of the policies within each chapter and their page number;**
- **Inserting the chapter title within the page heading;**
- **Moving the South Cheshire sub-regional policy framework so it directly follows the Manchester City Region chapter;**
- **Rename draft RSS Chapter 11 "Environment, Minerals, Waste and Energy" to clarify its content.**

Transition from Structure Plans to LDF

- 15.12 Several participants, at both the EiP, and in the original representations, raised concerns over the transition from old style Structure Plans to the new LDF system. There was concern that the adoption of the RSS in its current form would leave a policy vacuum until LDDs were adopted by the relevant local authorities. There were several objections to Chapter 19 of the draft RSS. This contains a list of the existing Structure Plan policies in the region, indicating those that would be replaced by draft RSS policies when adopted.
- 15.13 We did not feel the EiP sessions were the appropriate place to look in detail at this table, as not only would this be a time consuming process, but we did not have the appropriate information available to come to an informed opinion. It was also felt that given the likely changes in the RSS from our recommendations and GONW proposed changes, the table would require review and updating before the final RSS was published.
- 15.14 At the EiP GONW explained the protocol for requesting extension of saved policies beyond the three year period. We noted that the Government Office for East of England intended to consult on the draft list of which RSS policies should replace which saved Structure Plan policies at the Proposed Changes Stage. This seemed to us to be the most sensible stage to conduct this task, and would give the local authorities and other relevant consultees further opportunities to consider the appropriateness of this list. GONW agreed to carry out this process as part of their review of the RSS. We therefore recommend no change to this chapter, but that its review is carried out by GONW in consultation with NWRA and appropriate consultees.

RECOMMENDATION

R15.2

We therefore recommend no change to Chapter 19 at this stage, but we recommend that a review is carried out by GONW in consultation with NWRA and appropriate consultees.

Delivery and Implementation

15.15 Chapter 3 of PPS11 provides guidance on the implementation, monitoring and review of RSS. It states that:

appropriate implementation mechanisms should be identified along with the organisations responsible for delivering policies.

NWRA have set out the guidance on the implementation of the RSS in the draft Implementation Framework which was produced alongside the draft RSS.

The Implementation Framework

15.16 Questions were raised through the consultation as to whether producing the Implementation Framework as a separate document was appropriate. PPS11 paragraph 3.2 allows for the production of the implementation plan as a separate document, and indicates that if it is it should be cross-referenced in the draft revision to the RSS and submitted with that revision to the Secretary of State.

15.17 There was general agreement that the approach taken by NWRA was acceptable, and we would support that view. Keeping the implementation plan separate allows for constant review and for amendments to be made to the document, without having to review the RSS itself in full. This will be useful for example if the monitoring process identifies changes that are required to the targets, or if implementation mechanisms (funding streams, organisations) change over the RSS period.

15.18 To illustrate the changing circumstances, NWRA Briefing Paper 19 identified proposed further development of the Implementation Framework. The Briefing Paper clearly shows that there is much work still to be carried out on the targets and indicators, and this work will evolve over time. We welcome NWRA's comments that the further development of the Framework will draw on the ERN Best Practice Guide on RSS Implementation which is nearing completion.

15.19 GONW considered that the Implementation Framework could look at how the delivery of the outcomes in the RSS links to other plans and organisations' outcomes. We agree that this will be important in the successful delivery of a spatial strategy, and note that further work that NWRA intends to carry out includes developing further links with other monitoring programmes.

15.20 We also have some concerns over the issue of who will take the lead in some of the situations that will arise that require joint working - both between local authorities and public/private organisations. There will be a need to ensure that cross-boundary working is carried out effectively and efficiently, and NWRA will have to play a strong role in ensuring that any joint working is consistent across the region where required, to successfully deliver the RSS outcomes.

Appendix A- Further Explanation of Implementation of Selected Policies

15.21 Concerns were raised by GONW that some of the content of the Implementation Framework seemed to be explaining policies, and that the appropriate place for this guidance would be in the RSS itself rather than the Implementation Framework. GONW indicated their concern by using the example of the guidance in the Implementation Framework in paragraph A2.8 which sets out the criteria LDFs should use to define and classify coastal zones. NWRA considered that the Implementation Framework was the appropriate place for this advice, and keeping it in this document would allow them to keep the RSS as clear and concise as possible. We agree that this type of advice is acceptably placed within the Implementation Framework, as long as the RSS contains clear links to this advice.

Monitoring

Outcomes and Headline Targets

15.22 Table B1 of the Implementation Framework includes a set of headline targets which are used to measure the key outcomes of the RSS. It was suggested during the EiP session that it might be appropriate to include these headline targets within the RSS itself, to tie the spatial framework into the implementation framework. We share the concerns of NWRA that putting such targets in the RSS would become "Tablets of Stone", and if they were to be found to be inappropriate, a review of the RSS would be required. Having the targets within the implementation plan allows for easier review if the targets are found to be inappropriate over the RSS period.

15.23 As we indicate below when looking at the policy targets in Table B2, we do not consider it appropriate to recommend new or re-worded headline indicators in this report, but would suggest that NWRA work in close consultation with interested parties to review the headline targets to ensure they are the appropriate measure of the outcome. We agree that with the present

format it would be difficult to know whether the outcomes have been reached just by meeting the headline target.

Targets and Indicators

- 15.24 GONW have reservations over the appropriateness of the targets and indicators in the Implementation Framework, considering that in some cases it is difficult to identify the link between the policy measured and the indicator identified, and how the indicator will monitor whether the policy is being implemented and having the desired effect. Their concern over the lack of contextual and qualitative indicators, which could provide a context for the policy and an indication as to whether it needed adjusting, was shared by several participants. An example was given of how new qualitative indicators would play an important role in relation to housing market assessment, and it was noted that the range of indicators required was rapidly changing.
- 15.25 We do not feel that we have sufficient knowledge or information to recommend whether each individual indicator is appropriate, and if not what alternative indicator should be used. We do though acknowledge the concerns of the participants, and recommend that NWRA review the indicators that are currently in Table B2, and work in consultation with the appropriate parties in developing a clear set of indicators that will effectively monitor the policies.
- 15.26 In terms of the targets identified in Table B2, there was also concern that the some of these were not appropriate. AGMA were unsure as to whether the targets identified in Table B2 were the right targets, and whether the targets would be achieved through the implementation of the RSS policies, or would be achieved through other plans or strategies. The example was given of the target in Table B2 to "Meet Kyoto targets by 2012 to reduce CO₂ emissions to 12.5% below 1990 levels." It would seem that the RSS is being measured by whether this target is achieved, even though there are many other plans and strategies that will need to contribute to meeting this target. The RSS policies will only play a small part in achieving this target, and where this is the case it should be indicated in the notes included in Table B2.
- 15.27 Both CPRE and HBF agreed that the RSS should be more specific in terms of triggers and thresholds that would indicate there needs to be a change of policy approach. We are wary of too much prescription in the RSS in this respect, and agree with

NWRA that inclusion of too much detail at this stage, and the inclusion of a certain trigger or threshold, may not be appropriate in 6-12 months time given changing circumstances. We are also wary that the development industry does operate in cycles, and agree that triggers should not be set in RSS that may be caused by blips in this cycle.

Monitoring at the Sub-Area Level

- 15.28 There was some debate during the EiP over the lack of sub-regional targets and indicators in Table B2 of the Implementation Framework. Concerns were raised about the ability of the local authorities to collect data which could usefully monitor the implementation of these policies. We acknowledge the concerns over achieving a consistent evidence base from all local authorities, and it is noted that authorities across the region will vary greatly in their ability and resources available to collect the appropriate data, but we also note that this will be a key issue in the new LDF system. Local authorities will need to produce a clear and appropriate evidence base in the production of their LDDs, and this information can then be fed upwards to the RSS to improve its understanding of the delivery of RSS policies. Cumbria CC indicated that they see their role changing given that they are no longer required to produce a Structure Plan, and this will provide an opportunity for them to help the districts produce useful monitoring data (such as housing land availability, Key Service Centre data) that can then be fed back to the Assembly.
- 15.29 We are satisfied that the inclusion of targets and indicators for the sub-regional policies at present would not be appropriate, but would advise that this is one issue that is taken forward by NWRA for possible inclusion once the evidence base is further developed.
- 15.30 With regard to the need for a separate policy regarding monitoring, we point to Chapter 3 of our Report and suggested Policy DP9 - Implementation. We consider this policy appropriate in terms of encompassing the principles of plan-monitor-manage into the RSS more fully.

Review

- 15.31 Throughout the EiP there were calls for partial reviews to be carried out on a variety of different topics dealt with in the draft RSS. This issue is dealt with in Chapter 2 of our Report, where we make a recommendation as to the timing and topics that

should be covered by a partial review. Other calls for review of certain policies are dealt with in our Report under their appropriate chapter.

