

NORTH WEST TRANSPORT ACTIVISTS ROUNDTABLE POSITION STATEMENT ON THE SECRETARY OF STATE'S PROPOSED CHANGES TO THE NORTH WEST REGIONAL SPATIAL STRATEGY

(Consultation closed, Friday, May 23rd 2008)

The NW TAR considered that the most alarming aspect of the proposed changes was what the document had to say about housing figures.

It said: *"it is proposed to remove the ceiling to housing figures, in line with the more flexible approach of Planning Policy Statement 3, to enable additional growth and current government initiatives of Housing Growth Points and Eco Towns to be accommodated"*.

As it happened, the controversial 'Eco Towns' announcement by the Department for Communities and Local Government did not include one for the North West, but at the time this position statement was compiled the announcement on growth areas was still awaited.

In as far as a *"flexible"* approach is concerned, PPS 3 on Housing refers several times to the need for a flexible and responsive supply of land available for housing and flags up the fact that *"the Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home"* (para. 9), but it fails to say anything about housing figures becoming redundant. In fact, it could be argued that removing the ceiling for housing figures contravenes another PPS - PPS 11 on Regional Spatial Strategies - which requires the *"identification of the scale ... of provision of new housing"*, as well as the distribution (para. 1.3) and it also says: *"the RSS will need to provide housing figures for individual districts or appropriate sub-regional housing market areas"* (para. 1.5) which is indeed what the Draft RSS did and what was debated at the RSS Examination in Public (EIP) in late 2006/early 2007. The Panel report on the EIP, published in March 2007, endorsed the maximum figures it indicated (in Policy L4 and Table 9.1). As it was, this represented what the Panel described in their report as *"a considerable relaxation the restraint policies that currently apply in the North West"* (para.6.24) because, net of clearance replacement, it amounted to an average net increase of nearly 23,000 dwellings a year up to 2021. The corresponding figure in the extant RSS is just under 13,000 a year for the region.

NW TAR contend that this proposed approach by the government undermines the role of regional planning. The RSS is supposed to set constraints that take on board issues such as climate change, sustainable development and environmental capacity to focus the attentions of local authorities on these issues.

As it was, with the maximum figures that were proposed, it was a given that once they were apportioned down to the local level, there were going to be some shocks in store for some communities, but now the proposal is that there should not be any upper limits at all. (NB. The issue of where development would go would still be controlled by the sequential approach to land use and by Local Plans & UDPs but the pressures to open up new areas for housing would be immense).

In the opinion of the NW TAR, this throwing open of the floodgates to unconstrained housing, if it is approved and appears in the final version of RSS, would completely negate the improved policy wording in relation to climate change.

Another unwelcome change to the main policy in the Regional Spatial Framework was the addition of six towns and cities into the list that constituted the third set of priorities for growth. These were not debated as candidates for inclusion earlier in the process. The first priorities for growth are the regional centres of Manchester and Liverpool. The second are the inner areas surrounding those regional centres. The third priority now includes Carlisle, Chester, Crewe, Lancaster, Preston and Warrington.

This was in direct contradiction to the Panel Report which said that Chester was not to be considered for major growth. It had a fourth priority listing into which Lancaster, Crewe and Carlisle were placed. The argument to support the proposed change here is that it would more closely align RSS with the RES, but this argument was not one which was made by GONW earlier in the process.

The policy which elevates Carlisle, Chester, Crewe, Lancaster, Preston and Warrington to a higher priority for development says: *“As far as possible, growth should be focused in their centres and inner areas but development elsewhere may be acceptable if it satisfies other policies”* (Chapter 5, p.62, Proposed Changes). This modification, along with any transport implications, was not debated at the Regional Spatial Strategy Examination in Public in which the NW TAR were key participants.

And, on the matter of ‘other policies’, the report recommends that, for the purpose of policy-making, all of Congleton and Warrington should be considered to be within the Manchester City Region and all of Vale Royal is to be considered within the Liverpool City Region. And it supports the Panel’s recommendation that a future review of RSS should consider more closely Crewe’s relationship to the North Staffordshire conurbation in the West Midlands. Although an unproven concept, it would appear that sprawling ‘City Regions Rule – OK’ is the order of the day.

As far as Green Belt is concerned, the Panel report slightly strengthened the policy and supporting wording promoted in the Draft RSS, especially in respect of what happens after 2011, but the proposed changes have slightly weakened both again. The latest wording, as the original, is now open to mis-interpretation once more. It could be implied that strategic studies to amend the Green Belt could start any time during the period of the RSS. In addition, whereas the Panel Report was explicit that, at the Local Development Framework level, the only exceptions to changes in Green Belt would be likely to be around Manchester and Liverpool John Lennon Airports, the new wording introduces a phrase that implies that it is appropriate to debate any local changes to Green Belt through the LDFs at any time so long as they meet the exceptions criteria in PPG 2 on Green Belts (para. 5.36, p.72, Panel Report).

Under the Economic Objectives, it is suggested that the reference in the introduction to the bullet points should drop the phrase approved by the EIP Panel of ‘Reduce the need to travel’. The argument for doing this is that it is a cross-cutting, over-arching policy and it would represent repetition. But, in this section – which is talking about ‘Working in the North West and Achieving a Sustainable Economy’ - it is particularly apposite. However, rather than repeat the exact phrase in the introduction to this section, an extra bullet point supporting it might be more appropriate, possibly along the lines of: *“support sustainable methods of commuting and development and/or working patterns which reduce or eliminate unnecessary commuting”*.

The suggested new wording for Policy W1, ‘Strengthening the Regional Economy’, again specifically promotes business growth in Chester, (bullet point 2, p.73, Proposed Changes), despite what the Panel report said about it. Also, support for the RES is totally unequivocal; it should be more measured.

The government agree with the Panel that there is an over-allocation of employment land in Cheshire and Warrington. But, in suggesting that some should be de-allocated, it proposes alternative uses should be considered, inc. housing, and reminds LAs of the need to sustain *“mixed use communities where there is access to a wide range of services and facilities”*.

Tourism was not a matter the EIP Panel chose to debate. But government have chosen to make an amendment to the policy to emphasise sustainable access. The need is for sustainable tourism. This is so important that NW TAR contend wording about it which currently appears as the second sentence in para. 6.29 (p.87, Proposed Changes), should ideally be brought into the policy itself.

The policy on walking and cycling remains, which is welcome, even though the policy itself could be better, but there is a need for more connections to be made between land use planning and transport.