

## APPENDIX A

### DRAFT REGIONAL SPATIAL STRATEGY FOR THE NORTH WEST OF ENGLAND

#### DRAFT CENTRAL LANCASHIRE CITY RESPONSE

##### 1.0 Summary

- 1.1 The Central Lancashire City authorities of Chorley, Preston and South Ribble have collectively agreed a response to the draft Regional Spatial Strategy (RSS). In summary, the City authorities request that the policies and text of the RSS should be amended as appropriate to recognise the status of the Central Lancashire City area as a key location for sustainable economic growth that supports the wider Central Lancashire City Region.
- 1.2 This would align the RSS with the approved Regional Economic Strategy (RES), which recognises that in the Central Lancashire City region there are differences in growth rates between parts of East Lancashire and the more dynamic area around Preston, which includes Chorley and South Ribble. The RES also recognises the emerging importance of Preston and its environs as a focus for city scale investment complementing the major cities of Manchester and Liverpool.
- 1.3 The Central Lancashire City authorities have jointly commissioned research to provide an evidence base supporting the development of a Central Lancashire City Sub Regional Strategy (CLCSRS) and Vision. The CLCSRS has been subject to widespread consultation, including other Lancashire local authorities and a range of organisations and agencies. The CLCSRS and Vision form part of this response and are attached as supporting documents.

##### 2.0 Our Region (page 3)

- 2.1 Paragraphs 2.3 and 2.4 of this section outline the roles of the Manchester and Liverpool City Regions and footnotes 2 and 3 list the regional centres and key regional towns within each of these City Regions. Paragraph 2.5 describes the role of Chester within the wider Liverpool City Region.
- 2.1 Although paragraph 2.6 outlines the role of the Central Lancashire City Region, it does not fully articulate, either in the text or by way of a footnote, the role that the regional city of Preston plays with the City Region. Given that the RES and the RSS should be consistent, the references to Preston within the finalised version of the RES should be mirrored within the RSS. The RES vision specifically mentions Preston as a 'key driver of city-regional growth' and refers, in Transformational Action 54, to 'capitalising on the strengths and assets of ... Preston as a driver of city-regional growth'.
- 2.1 The profile of Preston within the Central Lancashire City area, which for the purposes of the RSS includes the administrative areas of Chorley, Preston and South Ribble, should be strengthened throughout the RSS. Policy W6 – Tourism and the Visitor Economy – refers to 'the regional city of Preston'. It is argued that this phrase should be adopted elsewhere in the RSS, to strengthen the City's profile within the document.

##### 3.0 The Regional Development Framework (page 8)

- 3.1 **Objectives and Outcomes:** Preston's role as a key rail and motorway hub should be mentioned in this section. It is suggested that paragraph 4.2, section 3) should be reworded to read:

'Underpin the gateway functions of the region's main airports ... the port of Liverpool as the UK's key Atlantic seaport and *the regional city of Preston as a key rail and motorway hub and transport gateway.*'

#### **4.0 Regional Spatial Framework (page 15)**

#### **4.1 Policy RDF2 – Key Service Centres**

- 4.1.1 This policy is very confusing and poorly developed. It refers to 'key service centres' previously designated, probably using different qualifying criteria, in separate Structure Plans. It goes on to propose that these centres should be reviewed by future plans and strategies and yet it is also mentioned in paragraph 7.2 that the NWRA intends to carry out its own research into the role played by these centres to inform a future review of RSS. This uncertainty is unacceptable as local planning authorities need a clear and consistent steer on how in policy terms the various settlements are envisaged to interact. This would then enable an appropriate distribution of new development between settlements to be taken forward by Local Development Frameworks.
- 4.1.2 Policy RDF2 is an important policy especially as it is cross referred to by other policies such as CLCR3 – Development in other parts of the Central Lancashire City Region. Without a fully developed list of key service centres that recognises the substantially sized settlements in quasi rural and suburban districts such as Chorley and South Ribble it may well be difficult to ensure the aim to promote more sustainable development and balanced communities is achieved. This point is further developed below.
- 4.1.3 In addition, paragraph 14.8 of RSS refers to Preston being 'strongly linked to the suburbs to the south of the River Ribble...'. The identification and policy status of these settlements needs to be established as it links with the key service centres issue. The reference to 'suburbs' should be replaced by 'communities'.

#### **4.2 Policy RDF3 - Rural Areas**

- 4.2.1 A key omission of this policy is that there is a policy gap between the role of key service centres and the settlements in the 'sparse' rural areas. There are parts of Cheshire and Lancashire that have rural areas that cannot be described as 'sparse', yet they have no identified key service centres.
- 4.2.2 Although paragraph 7.4 refers to Local Development Frameworks having a role in identifying smaller local service centres, there needs to be more guidance in RSS as to the role these settlements should play. In Chorley, for example, there are several settlements that fall within the 2,000 – 4,000 population range, that function as local service centres.

#### **4.3 Table 7.1 Settlement Hierarchy**

- 4.3.1 Preston, as part of the Central Lancashire City, should be identified in Table 7.1 as a regional city, along with the regional cities of Chester and Carlisle. It is argued that there is a requirement for a separate column in this table to identify these three centres as an intermediary level in the regional settlement hierarchy, at the next level below the regional centres of Manchester and Liverpool. (See related comments in connection with Policy W5 – Retail Development.)
- 4.3.2 The rationale for inclusion of the list of settlements in Table 7.1 should be more clearly set out. There are settlements in the region that are suburban in character. In Chorley these include Euxton, Coppull, Clayton-le-Woods and Whittle-le-Woods, with populations ranging from 4,000 to 16,000. Similarly in South Ribble, such settlements include Penwortham, Bamber Bridge, Lostock Hall and Walton-le-Dale. In terms of the wider City Region, these are places that fall within the Central Lancashire City urban area that may be appropriate to

accept some growth. However in settlement hierarchy terms, they will perform different but complimentary roles, consistent with their size and function.

#### **4.4 Policy RDF5 - Green Belts**

- 4.4.1 Proposals for maintaining the general extent of green belts in the Central Lancashire City Region until 2011 are considered to be a premature argument to embed in RSS policy. Before this date there could be a requirement for a limited review of the green belt area in South Ribble and Chorley, for regeneration and economic purposes. Although a limited review could be facilitated through the LDF process, there is a requirement for the principle to be included within RSS.

#### **5.0 The Regional Policy Framework (page 20)**

##### *Working in the North West – Achieving a Sustainable Economy*

#### **5.1 Policy W1 – Strengthening the Regional Economy**

- 5.1.1 Bullet point 4 - Central Lancashire - should include reference to the Central Lancashire City's role, and particularly Preston's strength, as an administrative centre and centre for creative industries.

#### **5.2 Policy W2 – Broad Locations for Regionally Significant Economic Development**

- 5.2.1 The Central Lancashire City authorities welcome the inclusion of central Preston as a 'broad location' for a Knowledge Nuclei Site but stress that, in line with indications in the Key Diagram (page 9) and CLCR Diagram (page 78), priority for the Knowledge Nuclei Site location should be central Preston. Furthermore the 'focus for growth' area as shown on the latter diagram should be extended southwards to include the Regional Investment Site at Royal Ordnance near Chorley. In this way the diagram would be more consistent with paragraph 14.7 of RSS.
- 5.2.2 It is considered that Knowledge Nuclei Sites should be more clearly defined in RSS. There is the need to define whether these sites will be counted as outside the employment allocation, in the same way as Regional Investment Sites.

#### **5.3 Policy W3 – Supply of Sub-regional and Local Employment Land**

- 5.3.1 As Table 8.2 and 8.3 have a total of 16 footnotes, understanding how land allocations have been derived is very difficult. NWDA have accepted the need to increase Lancashire's allocations from 15 to 18 years' supply that 30% should always be available to the market, that there should be 3 yearly reviews and that industrial land allocations (B2) should be reduced in favour of (B1) office/light industry. This is broadly acceptable to the Central Lancashire City authorities.
- 5.3.2 However, Table 8.2 does not explicitly exclude Regional Investment Sites from employment land allocations. They are excluded from 'A' in Table 8.2 but does the 441 hectares (2005 - 2021) of additional land allocations needed in Lancashire ('H' in Table 8.2) still exclude any new Regional Investment Site, Knowledge Nuclei or Reserve Site allocations?

#### **5.4 Policy W4 – Release of Allocated Employment Land**

- 5.4.1 Acknowledgement at paragraph 8.18 that 'Central parts of the Central Lancashire City Region' have pressures for the release of employment land for other uses is welcomed.

## 5.5 Policy W5 – Retail Development

5.5.1 Both PPS11 and PPS6 refer to topics to be covered in RSS. In particular, PPS6 states that:

‘...Regional planning bodies should:

- Actively promote growth and manage change in town centres;
- Define a network and hierarchy of centres, each performing their appropriate role to meet the needs of their catchments.’

5.5.2 It is important to ensure that the network and hierarchy of centres, as required by PPS6, is clearly set out in RSS, to avoid ambiguity and misinterpretation at the local level. Given the phasing out of policy at structure plan level, the RSS will need to direct policy at the local level. There should be recognition in RSS of the strategic regional significance of Preston, given its city status / market conditions/existing role and function and proposals for the Tithebarn Regeneration Area.

5.5.3 PPS6 (Annex A) defines city and town centres in terms of their type and main characteristics. In assessing the hierarchy/network of centres, reference should be made to the differing roles that city/town centres provide and that city centres are the highest level of centre identified in development plans.

5.5.4 As policy W5 lists all 26 centres in the regional retail network and (apart from the major regional centres of Manchester and Liverpool) provides no further clarification of their individual roles, the Central Lancashire City authorities consider that the policy should recognise the functions of the regional cities of Chester, Carlisle and Preston in the promotion of more sustainable shopping patterns. PPS6 (2.13) requires RSS to ‘make strategic choices about centres of regional and, where appropriate, sub-regional significance’. Therefore to provide an effective steer at the sub-regional level, the authorities consider that the retail hierarchy should be reconsidered and the retail policy reviewed. Suggested rewording of policy W5, to take account of a review of the hierarchy, is provided below. Appropriate amendments will also need to be made to the accompanying supporting text.

**Plans and strategies should promote retail investment where it assists in the regeneration and economic growth of the North West’s towns and city centres. In considering proposals and schemes any investment made should be consistent with the scale and function of the centre, should not undermine the vitality and viability of any other centre or result in the creation of unsustainable shopping patterns.**

**Manchester and Liverpool City Centres will continue to function as the North West’s major regional centres.**

***In order to promote sustainable shopping patterns throughout the region, the regional city centres of Carlisle, Chester and Preston will provide the primary focus for higher order retail provision outside the major regional centres.***

**Comparison retailing facilities should be enhanced and encouraged in the following centres to ensure a sustainable distribution of high quality retail facilities outside the regional centres:**

***~ Altrincham ~ Ashton-under-Lyne ~ Barrow-in-Furness  
~ Birkenhead ~ Blackburn ~ Blackpool  
~ Bolton ~ Burnley ~ Bury  
~ Crewe ~ Kendal ~ Lancaster***

~ **Macclesfield ~ Northwich ~ Oldham**  
~ **Rochdale~ Southport~ St Helens**  
~ **Stockport ~ Warrington ~ Wigan**

**Investment in centres not identified above will be encouraged in order to maintain and enhance their vitality and viability, including investment to underpin wider regeneration initiatives, to ensure that centres meet the needs of the local community, as identified by Local Authorities.**

**Retail development that supports entrepreneurship, particularly increasing the number of independent retailers, should be supported.**

**There will be a presumption against new out-of-centre regional or sub-regional comparison retailing facilities requiring Local Authorities to be pro-active in identifying and creating opportunities for development within town centres. There should also be a presumption against large-scale extensions to such facilities unless they are fully justified in line with the sequential approach. There is no justification for such facilities to be designated as town centres within plans and strategies.**

## **5.6 Policy W6 – Tourism and the Visitor Economy**

- 5.6.1 In addition to Manchester, Liverpool and Blackpool, business tourism is significant in the Central Lancashire City area, where there are large hotels unrelated to a ‘holiday’ function. They are important to the business tourism economy as conference venues, as well as overnight stays, and they provide employment in the service sector. This important role should be recognised within the policy. Reference should also be made within the policy and supporting text to the West Pennine Moors, which provide attractive sustainable areas for outdoor informal recreation located close to urban areas.

### *Living in the North West - Ensuring a Strong, Healthy and Just Society*

- 5.7 The Central Lancashire City authorities support bullet point 4 of paragraph 9.1 that promotes strong and viable centres, but considers that the reference to *using retail development as a key driver for regeneration*, as included in the Interim Draft RSS, should be re-inserted.

## **5.8 Policy L4 – Regional Housing Provision**

- 5.8.1 The level of housing provision in the Central Lancashire City should be sufficient to support the projected levels of sustainable economic growth in the area. This should allow for a range of housing types to cater for a broad market, including affordable housing. The targets for the “Greater Preston” housing market area need to be reviewed in light of emerging national policy and research, and evidence presented in the attached CLCSRS document. It is suggested that the NWRA’s rationale for deriving the current targets, as described in the Technical Summary is not sufficiently clear and robust and should be reviewed prior to the Examination in Public (EiP). It should take particular account of recently published ODPM research on population and household formation projections, and of the emerging Planning Policy Statement 3 “Housing” which is due to be finalised and published before the date of the EiP.
- 5.8.2 The inclusion of a reference to supporting ‘the potential for economic growth’ in paragraph 9.19 (d) is supported and consistent with the reference in paragraph 9.18 to focussing ‘development in those locations, which are the key future economic drivers of the regions economy’ as ‘Greater Preston’ / Central Lancashire City is one such driver. However the difference between the scale of housing provision proposed in Chorley compared to

Preston and South Ribble is marked and not explained anywhere in the RSS or the Technical Appendix.

- 5.8.3 The Central Lancashire City authorities accept the overall target level of housing provision across the three authorities (i.e. a maximum of 24,220 dwellings to be provided up to 2021) **provided** a cross-district, managed and monitored, phased approach to meeting the three figures combined can be adopted. The emerging PPS3 indicates that housing provision should be phased across housing market areas. This makes sense for the Central Lancashire City area, where aligned LDF Core Strategies and Economic Development Strategies will allow for more effective management, monitoring and delivery of housing land releases over the broader “Greater Preston” housing market area to support sustainable economic growth.
- 5.8.4 This overall scale of housing should enable the removal of the severe restrictions currently placed on controlling new developments in the three authorities and allow a range of residential proposals appropriate to support economic growth. It should also enable the realisation of cross subsidy opportunities to address the affordable housing issues which are now prevalent across the whole area.
- 5.8.5 In order to make the most efficient use of land, national government has set an indicative target of 60% as the proportion of housing provision on previously developed land. However, Table 9.1 indicates a target of at least 80% for the Greater Preston housing market area. The achievement of a brownfield target is seldom the sole consideration in determining applications for development. In seeking to deliver sustainable communities, other factors will include site location, impact on overall housing land supply and whether the development would result in the loss of a viable employment use. In view of this, and taking into account the findings of recently completed Urban Potential Studies and the growth potential of the area outlined in the CLCSRS, the Central Lancashire City authorities consider that a more realistic brownfield target should be a maximum of 75% for the Greater Preston housing market area.
- 5.8.6 The Central Lancashire City authorities wish to ensure that sustainable economic growth is supported by the right type, quality and quantity of new housing in the most appropriate locations. It is important that housing provision within the area is not unduly restrained as this will have an impact on realising the area’s growth potential. The housing provision figures set out in the draft RSS are expressed as maximum amounts and it is expected that over-supply in the early years will be ‘corrected’ by the managed release of future sites. Chorley and South Ribble completions in the first three years of the RSS period have significantly exceeded the annual provision levels in the submitted draft (Preston’s are on target) despite restrictions being in place on the release of new sites. The continuation of such restraint aimed at quickly achieving the draft RSS annualised average could undermine economic growth.
- 5.8.7 With the caveat that the RSS housing targets need to be reviewed in light of emerging and new national policy and sub-regional research, and that housing land release should be managed and phased across “Greater Preston” housing market area, the Central Lancashire City authorities agree that the overall target figure should be 24,220 by 2021.

### *Transport in the North West – Connecting People and Places*

## **5.9 Transport Investment Priorities**

- 5.9.1 The transport investment priorities that should be identified in Table 10.2 are those that will support growth in the City Regions. With regard to the Central Lancashire City area, these need to include improved access to Preston city centre integrated with strategic movements throughout Preston, South Ribble and Chorley, improvements in accessing the M6 motorway and enhancements to rail and public transport linkages between the three City

Regions of Manchester, Liverpool and Central Lancashire, including improvements to the West Coast Main Line and Preston to Manchester railway routes and improvements to Preston railway station.

- 5.9.2 However, the only references to these priorities within Table 10.2 are under 10.2e – National Interventions – relating to broad improvements to rail links and improved management of the Local Transport Network in Preston. These references need to be subject to ongoing review and more targeted proposals that support the sustainable economic growth of the area need to be included (as per the lists of more localised projects suggested in Greater Manchester and Merseyside). These are likely to include measures to deal with congestion throughout the City area, strategic motorways connections, public transport infrastructure improvements and crossing points over the River Ribble.

## 5.10 Policy EM17 – Renewable Energy

- 5.10.1 This policy appears to have some internal inconsistencies. It refers to progressive targets (which are welcomed) of 10%, 15% and 20% of all electricity supplied in the north west to be from renewable energy sources yet the minimum required of developments stays at 10%. Also there is no stated justification for the minimum thresholds sizes of developments required to source energy in this way. The threshold therefore appears arbitrary – developments of all sizes can be required to source renewable energy.

## 6.0 Sub-Regional Policy Frameworks (page 69)

### 6.1 Central Lancashire City Region

The first line of paragraph 14.1 should be reworded to read:

*‘The main foci of the Central Lancashire City Region are the regional city of Preston and the regional towns of Blackburn, Blackpool and Burnley.’*

- 6.2 The reference at paragraph 14.2 to the contribution by the Central Lancashire City Region to regional GVA is welcomed. However, it should be clearly stated that this is driven by the Central Lancashire City area of the City Region, based on the local authority areas of Chorley, Preston and South Ribble. Economic trends in this area reflect national levels, whereas Lancashire as a whole reflects lower, regional levels. (Historically an average GVA growth rate of 2.78% pa, compared to 2.16% for the region.)

### 6.3 Policy CLCR1 – Central Lancashire City Region Priorities

- 6.3.1 Reference in the first bullet point of Policy CLCR1 to the development and implementation of the ‘Preston City Vision’ is welcomed. These proposals have the potential to deliver regeneration benefits and sustainable economic growth. The Central Lancashire City authorities have taken the decision to re-name the joint area and therefore wish to see the term *Preston City Vision* changed to the *Central Lancashire City Vision*.
- 6.3.2 The joint authorities also welcome the inclusion of the first sentence in paragraph 14.7 but wish to see it amended slightly to read:

*‘The **Central Lancashire City** area of the City Region, based on the administrative areas of Chorley, Preston and South Ribble, provides a significant economic focus for the sub-region that will be implemented through the **Central Lancashire City Vision** and as a result of the **Central Lancashire Sub Regional Strategy**, which will be translated into Local Development Framework documents and local economic strategies produced by the three authorities.’*

- 6.3.3 As the second bullet point specifically links the location of Knowledge Nuclei Sites and Regional Investment Sites back to Policy W2, the Central Lancashire City authorities' response to Policy W2 should be referred to here.
- 6.3.4 The sixth bullet point refers to the role of Preston as the City Region's transport 'gateway' and key public interchange, in line with Policy RT1, but this role is not reflected in the transport section of RSS, or policy RT1 in particular.

#### **6.4 Policy CLCR2 – Focus for Growth in Central Lancashire City Region**

- 6.4.1 The Central Lancashire City authorities consider that the policy does not provide sufficient guidance and does not adequately reflect the individual key roles of each of the growth centres. The individual strengths of the growth centres must be built upon to ensure that they develop in a complimentary and sustainable way, for the benefit of the City Region as a whole. The authorities consider that these strengths should be set out in the policy and request that reference to the '**Central Lancashire City Vision**' as a key strength for the Preston growth centre (including its related core area of Chorley and South Ribble) refers to:

***'Centre for higher order retailing, commerce, culture, leisure, education and quality city living in Preston City Centre and high quality employment, infrastructure, tourism of an appropriate scale, local retail and leisure facilities and residential environments in Chorley and South Ribble.'***

These comments are submitted on behalf of the Central Lancashire City authorities of Chorley, Preston and South Ribble.