

CONSULTATION ON REGIONAL SPATIAL STRATEGY FOR THE NORTH WEST

EXECUTIVE MEMBER: Cllr G Blackwell

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Summary: The purpose of this report is to agree a formal response to the North West Regional Assembly on its draft Regional Spatial Strategy (2003 – 2021)

Recommendation:	That the comments set out in section 2 and Annex 1 of this report are submitted as response to the consultation
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Impact on delivering the Corporate Plan: An influential strategy for resourcing a range of economic, social and environmental objectives

Impact on other statutory objectives (e.g. crime & disorder, LA21): Major impact on delivering quality of life, economic development and managing nuclear legacy objectives

Financial and human resource implications: None of this report

Project & Risk Management: None

Key Decision Status

- **Financial:** N/A
- **Ward:** N/A

Other Ward Implications: None

1. INTRODUCTION

1.1 A new Regional Spatial Strategy (RSS) has been produced in draft by the North West Regional Assembly. It is to cover the period to 2021 and with the demise of County-based Structure Plans over the next 3 years it will become the principal policy lead at the sub-national level for the Council's Local Development Framework. Together with other regional strategies on the economy and housing it will be a major influence in determining the form, level and location of development and investment in our sub-region and significantly, since the RSS incorporates a Regional Transport Strategy, this includes investment in transport infrastructure.

1.2 The Regional Assembly has submitted the document to the Secretary of State and there will be a formal Examination (Inquiry) probably in Autumn 2006 when there will be an opportunity to present objections. It is therefore very important that the Council responds to the consultation on this draft document both on its own behalf and in association with partners in the LSP and CSP. The Transport Working Party has already discussed the transport issues arising and its recommendations are incorporated in the report at Annex 1.

- 1.3 Significantly the new RSS is being produced on a timetable which does not allow for the product of the West Cumbria Strategic Forum's sub-regional masterplan to be incorporated. This is particularly unfortunate given the commitment made by all partners in the WCSF to "**West Cumbria-proof**" their plans and strategies and the partners, of course, include all government departments and the Regional Assembly. It is therefore something which needs to be emphasised at the outset particularly in view of the Assembly's failure to provide an appropriate level of policy support for regeneration in West Cumbria as part of the draft now presented.

2. RESPONSE ON DEVELOPMENT ISSUES

- 2.1 At the outset in the document (para 2.7) there is a welcome reference to the problems of West Cumbria including the need for major economic restructuring and improved communications. Unfortunately this is not picked up in any of the policy treatments nor in the Introductory section: The Key Issues/Challenges identified in 2.12 – 2.14 are about creating a more competitive region with greater social inclusiveness but the basis for this is specifically a concentration on the City Regions. How disadvantaged parts of the region – e.g. West Cumbria or rural areas are to fare in these challenges is not referred to. In part this reflects the city-region emphasis in the "Northern Way Growth Strategy" which northern RDAs have signed up to. Nevertheless, at least the Northern Way highlights the nuclear industry in West Cumbria as an asset which has potential to assist the region's overall growth rate. This point is not really taken up by the RSS and should be.
- 2.2 Given the commitment now to do something really positive about rebuilding West Cumbria's post nuclear decommissioning economy (i.e. the sub-regional masterplan) it would seem sensible to go back to the previous RSS treatment of West Cumbria as a "**Priority Area for Regeneration**" and for this to be identified as a key issue/challenge with strands of urban renaissance and rural regeneration woven through the various subject policies. Their combined effect could then be more properly revisited in the sub-regional policy framework section for Cumbria and North Lancashire in Part 4 of the draft RSS.
- 2.3 The policy concentration on cities is reinforced by the proposed Regional Spatial Framework which is based on a settlement hierarchy where Manchester/Salford and Liverpool are identified as "Regional Centres" running through to the likes of Whitehaven, Cleator Moor, Egremont and Millom as "Key Service Centres" at the local level. In Cumbria, Barrow and Carlisle are identified at a higher level ("Regional Towns and Cities") than the Copeland towns and RSS therefore endows them with greater growth potential for development. This has a tidy geographer's logic about it but ignores a) the high priority for development to be channelled into West Cumbria over the next 20 years and b) the fact that although West Cumbria is made up of different towns and villages it operates as discrete urban cluster of common employment, housing, commercial etc markets with a combined population in excess of either Carlisle or Barrow. In many ways West Cumbria is a scale replica of the Central Lancashire City Region which has no single, dominating centre but a number of large towns (Preston, Blackpool etc). If this approach is accepted in the hierarchy for Central Lancs in relation to Manchester and Liverpool we feel it is equally as appropriate for West Cumbria in relation to an equal footing with Barrow and Carlisle. This is especially so since in the Sub-Regional Policy Framework section it states in para 15.5 that "Most of the development in Cumbria will be focused within Carlisle, Barrow and West Cumbria" which is slightly at odds with the Spatial Framework.
- 2.4 No-one would argue about the Principles for Regional Development set out in Policy DP1 which pick up on national policy imperatives such as sustainable development, making better use of land and buildings, ensuring higher quality of development and tackling climate change. But the Spatial Framework does build in an unnecessary and unjustified disadvantage for West Cumbria. Key Service Centres in West Cumbria are regarded only as a focus for services to their rural hinterland and not as a focus of new, sub-regional development and investment. It is

a question of importance attaching and scale. At the same time the identification of four towns in Copeland as Key Service Centres would seem to be at risk with reference in Policy CNL1 to only Whitehaven and Cleator Moor whilst there is reference in Policy RDF2 to reassessing the list of Key Service Centres in the future. This should be opposed.

- 2.5 In Policy RDF3 there is reference to a need for different kinds of economic stimulation for “sparse rural areas” but these are not specifically identified. Similarly in para 7.7 a Defra strategy is referred to which calls for help for “lagging” rural areas of Cumbria which includes Copeland. These issues need to be properly related to the subject policies and drawn together in the Sub-Regional Framework section so that the treatment of rural regeneration in West Cumbria is arranged alongside its urban counterpart. Obviously the allocation of resources must follow. There should also be a reference to the role of Local Service Centres in Policy RDF3 (and Policy L1).
- 2.6 Policy RDF4 The Coast introduces a new concept of “remote coast” to an already overly complicated policy area. Defining 3 different types of coast (as well as countryside elsewhere) and trying to encourage at one and the same time “protection, development and diversification of the maritime economy” is going to be a challenge.
- 2.7 With Policy W1 Strengthening the Regional Economy there is an opportunity which is not taken to refer to West Cumbria’s nuclear industry and knowledge-spin offs as a strength on which to build for the benefit of the region as a whole as per the comments in 2.2 above. We welcome the inclusion of Westlakes Science and Technology Park in what is a fairly short list of “knowledge nuclei” sites in Policy W2 “for regionally-significant economic development” (i.e. here, West Cumbria does have importance for the region’s performance) but there is great concern at Policy W3’s high negative value for the provision of land for employment in Cumbria, especially at this critical time in the rebuilding of the local economy. There was criticism of the RDA’s economic scenarios previously which were used without any adequate policy filter to justify this suggestion. There really needs to be a properly researched assessment of sites and growth factors before any such policy is confirmed i.e. we need a bottom-up approach rather than the imposition of a quota. As noted in para 8.14 there is need for more choice and flexibility and an attention to qualitative issues before any sites are discarded.
- 2.8 With Policy W5 Retail Development we welcome the general encouragement of town centre regeneration and sustainable shopping patterns but regard the omission of any West Cumbria centres in the list of so-called “regional centres” to be questionable, particularly since Kendal is listed (although it is not in the original list of Regional Towns and Cities in the Development Framework). Reference to the Whitehaven Regeneration Programme and MTI masterplanning exercises in Egremont and Millom should be made as evidence of the work being undertaken in West Cumbria.
- 2.9 The commitment to fostering tourism development is welcomed in Policy W6, especially related to the Lake District National Park and spreading its economic benefits, as are the principles of tourism development in Policy W7.
- 2.10 There is support for the use of Housing Market Assessments as described in Policy L2 and we particularly welcome the inclusion of West Cumbria in the identified areas for this approach looking at both urban and rural housing issues. Policy L3 will also assist with the restructuring of housing markets, the delivery of new build housing and encouraging regeneration. It is hoped that again this policy position is subsequently accompanied by adequate resources. However, this is not to accept that low demand is West Cumbria’s only housing issue. The need to rebuild the local economy means that there has to be a wider choice of housing sites made available to potential investors. The market assessments must include suggestions for other options than depending solely on the redevelopment of low demand housing areas in the older parts of the main towns and it is unlikely that the improvement in quality and choice of

housing envisaged in para 5.5 will be achieved by concentrating all the new housing provision in such areas.

- 2.11 There is fundamental disagreement with the requirements of Policy L4 and what appears to be an entirely unjustified capped figure for housing provision in Copeland. With the need to foster regeneration it just does not seem sensible to restrict new housing and artificially depress the market in this way. The West Cumbria housing market is fairly self contained and it is difficult to see what the policy is trying to achieve in terms of comparative effects. Certainly with the populations of Allerdale, Eden and Copeland outside the National Park it is difficult to see how the annualised figures for the 3 districts were arrived at i.e. 267, 239 and 230. We also still remain unconvinced that the RSS should set maximum targets for housing completions rather than planning permissions since the latter are much more directly influenced by Local Planning Authorities. Equally it is difficult to accept the use of 2003 as the base date for the housing figures. Once again the RSS is introducing arbitrary back-sighting which makes it very difficult for LPAs to manage the supply of new housing. The new RSS is not going to be adopted before 2007 in any event so why incorporate 4 years which cannot be influenced in any shape or form at that stage.
- 2.12 The proportion of land chosen as indicative targets for brownfield housing development has again been increased without any consultation or explanation. It is proposed that 80% of new development in Copeland should be on previously developed land. Perhaps this is further evidence of the Assembly's misconception of the Borough: This is not a single urban area with swaithes of derelict industrial land. Apart from Whitehaven it is very much a rural district where brownfield opportunities are in short supply. It is very, very difficult to understand how figures of 50% have been established for Carlisle and Lancaster ("Regional Towns and Cities" in the settlement classification which are much more urbanised than Copeland's Key Service Centres after all), 50% for places like Penrith and Kendal and 55% for Crewe and Nantwich. We really do need a proper explanation of how the Assembly has arrived at these figures and until this is provided we object most strongly, especially since high levels of brownfield redevelopment are not necessarily an aid to widening housing choice (see 2.10 above). What we should be aiming at is a reasonable split of Greenfield and brownfield options, say 40:60, in sustainable locations which would seem to accord with government requirements.
- 2.13 There is support for Policy L5's approach to securing affordable housing solutions which accords with the Council's current policies.
- 2.14 There is support for Policy EM1's approach to Integrated Land Management but it is noted that the provisions go beyond the traditional boundaries of the planning system in terms of controlling development and into overall "management". This needs to be backed by resources if the policy targets as regards biodiversity, landscape and heritage, and woodland provision are to be delivered.
- 2.15 There is support for Policy EM2 and the need to encourage sustainable remediation technologies for contaminated land. Again there is a need for this to be backed by adequate resources and we would suggest the former Marchon site at Whitehaven is a good example for the Assembly to use where a regeneration-linked project involves both hard and soft end uses.
- 2.16 There is support for the integrated approach in Policy EM3 to multi purpose green infrastructure. Also for the notion of Regional Parks with the Cumbrian coast included in the RSS's areas of search. The wider area around the former Marchon site and along the coastal fringe could benefit from such a designation.
- 2.17 The provisions of Policy EM5 on flood risk, water supply, waste water treatment and other drainage issues are noted as is the common sense approach in Policy EM6 to managing coastal development in terms of coastal defence, climate change and biodiversity targets.

- 2.18 Policies EM7 – EM13 relate to mineral extraction and waste management (including waste minimisation, recycling, treatments and energy recovery plus measures to reduce dependence on landfill). These are all fairly straightforward and can be supported. Policy Em14 relates to radioactive waste and actually includes a commitment to supporting the nuclear industry in the region as a centre of national and international expertise. It calls on “national and regional partners to work together to promote an agreed solution to the safe, long term management of radioactive waste, based on consultation with all relevant interests. This should incorporate a long term commitment to the reduction of radioactive discharges and to radioactive waste minimisation, management and safe storage techniques.” All this can be supported in terms of a range of futures for the nuclear industry locally. The NDA’s programme of decommissioning is mentioned but there also needs to be reference to the significant economic implications and cross reference with the W policies earlier.
- 2.19 There are 3 policies relating to energy including a fairly lengthy Policy EM17 setting out minimum targets for renewable energy production. It requires that local authorities and other partners should work on sub-regional studies of renewable resources. Perhaps it would be fairer for these assessments to be completed before the targets are set for the various parts of the region, especially in Cumbria where over a fifth of the wind-energy related development is envisaged by RSS over the period to 2021. Significantly there is no policy reference to further nuclear-based energy generation and in view of the current energy debate this policy vacuum should be filled with something positive bearing in mind comments elsewhere in the draft about the region being a centre of expertise for nuclear technology.
- 2.20 There is a Sub-Regional Policy Framework for Cumbria and North Lancashire with 3 spatial objectives to deliver more balanced communities and reduce inequalities. These include reducing dependency for “high level” jobs and services outside the county, increasing complementarity between key towns and developing/maintaining high quality modern transport networks (we come back to this area later). Interestingly Policy CNL1 supports the notion of West Cumbria being ranked alongside Barrow and Carlisle as locations to focus development and investment which is obviously supported but then omits Egremont and Millom from the list of key towns to benefit as does Policy CNL2. This is something we strongly object to. There is also reference in Policy CNL1 to creating a portfolio of regional/knowledge nuclei sites but a “portfolio” would suggest the need for more than the 2 sites identified in Table 7.1 for Cumbria and we would support other candidates in West Cumbria. Policy CNL1 appears to include support for housing renewal and measures “to improve the operation of routes linking West Cumbria...to the M6” (which is not quite the same as transport improvements) but picks and mixes between different parts of the County for policy items which should really apply equally e.g. Kendal is thrown in with Carlisle and Barrow for attention to creating better public transport, walking and cycling facilities for no obvious reason – all towns should benefit from such an approach.
- 2.21 We welcome the comments in support of regeneration in West Cumbria set out in para 15.7, particularly in relation to the WCSF’s masterplan. These range over the future of the nuclear industry, the pressing need for economic diversification, new employment opportunities, achieving coastal renaissance, restructuring local housing markets, rejuvenation of town centres and investment in transport infrastructure. These are all elements in the argument for treating West Cumbria as a “Priority Area for Regeneration” and the provisions should all be specifically incorporated into relevant policies. More pressing is a need for RSS to explain how it will deal with the product of the masterplanning exercise given the different timetables between the two pieces of work.

3. RESPONSE ON TRANSPORT ISSUES

- 3.1 The Transport Working Party met on 26th April. Its discussion paper and recommendations to the Executive are appended as Annex 1 to this report.

List of Appendices

[Appendix 1 – Transport Working Party's Report and Recommendations](#)

List of Background Documents: Copies of the volumes which make up the Draft RSS are available for reference in the Members' Room

List of Consultees: