

**CAMPAIGN TO PROTECT RURAL ENGLAND
CHESHIRE BRANCH**

**CRITIQUE OF THE APPROACH TO
DEVELOPING A SPATIAL STRATEGY FOR
WEST CHESHIRE & NORTH EAST WALES:**

**FOR CONSIDERATION AS PART OF THE
N.W. REGIONAL SPATIAL STRATEGY PROCESS**

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INTRODUCTION

Planning Policy Statement No. 11 (PPS 11) on Regional Spatial Strategies (RSSs) requires that RSSs should address the sub-regional dimension (para. 1.13). The Campaign to Protect Rural England (CPRE) * has no problem with this concept and recognises that unsustainable cross-border travel to work patterns have developed between West Cheshire and North East Wales, but would also point to substantial in-commuting to Chester from farther afield and fears the consequences of aiming for high economic growth in this area. CPRE does not believe that promoting the already overheating City of Chester, rather than continuing to focus on the metropolitan areas as advised by extant Regional Planning Guidance (RPG) for the North West, is a sensible way forward. This critique will show that the published analysis to date has not taken a balanced approach and has failed to give due consideration to adopted policies to suppress growth in North Cheshire in RPG, to the North West Region's Action for Sustainability programme or to a number of other factors.

CPRE contend that the West Cheshire/ North East Wales Sub Regional Study final report by GVA Grimleys, KPMG and Boreham Consulting of October 2004 focuses almost exclusively on economic-related matters. Not only do the social aspects and environmental constraints receive scant attention but the recommendations pose a serious threat to the Green Belt around Chester and to Green Corridors in Wales. In other words, the report, commissioned by a conglomerate of strategic players on both sides of the border, has pursued a particular line of investigation that is different from that for which it was intended and consequently it has recommended a policy that fails to address the problems that were its justification: indeed, it will exacerbate them.

The study was intended as the first of two stages in the preparation of a sub-regional strategy that would be incorporated into the RSS and was not, therefore, regarded as being complete in itself. Essentially, it was intended to investigate the workings of the sub-region and specifically to identify the inter-relationship of the economies on both sides of the national boundary and their impact on housing, travel to work, social inclusiveness and the environment. In fact a further study has now been commissioned by different consultants – Pricewaterhouse Coopers/ Hyder - to undertake an environmental and strategic environmental assessment of the implications of the recommendations of the study and to develop a range of refined options. However, whilst this work is still at an early stage, the RSS's 'Options Paper' has been published (on March 8th) and respondents to it are being asked to indicate a preference for one of three proffered growth options – or a combination of options – without having the benefit of research or study papers or a draft strategy to consult. None of these are offered on the website of the North West Regional Assembly (NWRA) as part of the 'Options' consultation. On what basis are most consultees supposed to make a judgement?

This report constitutes an analysis of the Grimley's report and the unfolding RSS process in relation to sub-regions, most particularly the West Cheshire/North East Wales (WC-NEW) Sub-Region. It has been produced in the first instance as a response to Hyder's request for comments on the emerging WC-NEW sub-regional strategy but it is also intended to feed into the Options Paper consultation and the deliberations of the NWRA as it develops the region's first RSS. It is primarily the work of John Wesenraft, Planning Adviser to CPRE Cheshire Branch, with inputs by Lillian Burns, Branch Vice Chairman, and Ann Jones, Planning Officer for Chester District CPRE.

* CPRE exists to promote the beauty, tranquility and diversity of rural England by encouraging the sustainable use of land and other natural resources in town and country

CRITIQUE OF THE GRIMLEYS STUDY: WEST CHESHIRE – NORTH EAST WALES SUB-REGIONAL STUDY, OCT. 2004

Context for the Study

It would not have been considered necessary to undertake a study if the Welsh Assembly, the North West Regional Assembly and local authorities had been satisfied that the inter-relationship between North East Wales and West Cheshire was operating in a sustainable manner. Consequently, it was essential the study consider, in a holistic manner, the options for providing for the area's future stability and the quality of life of its inhabitants. Those options would then be assessed and one or more fed into the reviews of the RSS for North West England, and into the Welsh Spatial Policy.

Regional Planning Guidance

The extant North West Regional Planning Guidance (RPG 13) contains a number of statements which highlight specific issues relevant to the study. Para. 3.32, which is quoted in para. 1.3 of the study report, is contained in the RPG policy on Green Belt and - in addition to advising that major change to the Green Belt around Chester is not considered to be necessary - makes three points:

- There are legitimate concerns about the impact of the growth of the Chester economy upon the housing market in North East Wales in the longer term
- the relevant local authorities should assess development and other relevant requirements in the sub-region as a whole;
- the assessment should inform the adoption of policies and actions which would establish a more stable and sustainable relationship between the component local planning authorities (LPAs).

Regional Planning Guidance also makes a number of significant statements concerning the spatial relationship of Chester (and North Cheshire) to the conurbation to the North, the North West Metropolitan Area (NWMA), but which are not referred to in the study.

Paragraph 3.5 of RPG 13 sets the scene for the whole Spatial Development Framework. It comprises three basic elements:

- *“a firm focus on concentrating growth and change in the Region’s two Regional Poles (the major city centres of Liverpool and Manchester/ Salford), their surrounding inner areas and the adjacent metropolitan towns ... to take advantage of the concentration of existing physical resources and development opportunities within those areas*
- *“the importance of maintaining urban form, and discouraging urban sprawl, with the assistance of extensive areas of Green Belt in and around highly urbanised areas and historic towns in the North West and*
- *sustainable patterns of growth and change in settlements elsewhere across the Region, supporting a network of settlements of differing sizes and roles surrounded by thriving and attractive rural areas.....”.*

Paragraph 3.6 states that:

“Development Plans and other spatial and land use strategies should be given clear and consistent expression to the Spatial Development Framework in this RPG in its entirety, but particular regard should be given to Policy SD1 which deals with the Regional Poles, the contiguous inner city areas and the North West Metropolitan Area”.

With the exception of Ellesmere Port Town, no part of the sub-region lies within the NWMA and therefore the bulk of it is not covered by Policies SD1 (NWMA – Regional Poles) and SD2 (Other Settlements within NWMA). Chester City is identified in Policy SD3 (Key Towns and Cities Outside the NWMA) as a key city outside the conurbation and is to be regarded as an

“historic town requiring continued conservation with sensitive integration of new development, where needed, plus a regard for maintaining and enhancing its setting”

More particularly, para. 3.18 describes the regional context for considering development in North Cheshire and especially West Wirral, Chester and its environs:

“To the south of the NWMA, the environment and the relative prosperity of the local economy may well generate demand for housing and other land uses over and above the western half of Wirral and Cheshire’s own needs, but this demand should continue to be resisted to support the urban regeneration of the NWMA and relieve pressure on areas of constraint within Cheshire together with potential traffic congestion. Provision for housing and other land uses should therefore be based principally on meeting the needs of the area’s current population and its housing needs. Development within and around Chester will need to respect both its historic character and its close functional relationship to North Wales”.

Policy SD4, ‘Maintaining Urban Form and Setting, and the Treatment of North Cheshire’, required further constraint on development south the NWMA, including the review of development plan allocations, to ensure that any existing and proposed allocations are fully justified in line with RPG’s Core Development Principles.

Policy EC6 considers ‘The Regeneration Challenge’ and instructs local authorities and other agencies to work together to rectify the imbalance between parts of the region where continued growth may have unfavourable consequences and those where economic regeneration is needed. Para. 4.23 warns that *“some areas that are very prosperous have little difficulty in attracting more economic growth, and are capable of attracting growth well beyond their immediate local needs, with distorting effects on travel to work patterns. Any further development planned in such areas – to the extent that it goes beyond meeting local needs – will need to be justified in terms of its wider benefits to the Region, and the scope for successfully managing any adverse environmental impacts”*. This concern is repeated in para. 4.29 in respect of North Cheshire, including Chester (through reference to Policy SD4) while para. 4.30 reinforces this by stating:

“Although a range of key sectors (for economic growth) has in recent years been centred in areas south of Merseyside, the focus should be shifted to the city centres, the conurbations and other key cities and towns to promote urban renaissance”.

Wales Spatial Plan

The Wales Spatial Plan (WSP) also recognised the cross-border relationship. It said the sub-region:

“has witnessed strong economic and employment growth over recent years, particularly in modern manufacturing, which has been accompanied by growth in population and new housing. Development of cultural, retail, administrative and leisure functions within Wales has lagged behind employment and housing growth, with Chester providing the majority of these functions. To counter-balance this trend, Wrexham will be developed as a complementary regional centre”. It also looks towards integrating the towns and settlements to the west and along the estuary and coast with the economic strength of Deeside to tackle the high levels of deprivation and their need for regeneration. Consequently, it recommends that the cross-boundary work should *“identify the economic, social and environmental potential and capacity of the area”*.

Mersey Belt Study

The study report also refers to the North West Development Agency's Mersey Belt Study of 2002 in which it suggests that the sub-regional study should appraise cross-border economic needs and opportunities that could explore a range of options for future land supplies and would accord with the approach beginning to emerge out of the RPG process.

Essentially these strategic analyses recognised that the sub-region was in danger of its economy overheating, particularly in Chester. There was an increasing imbalance within the sub-region between its ability to generate jobs and of its population to meet that requirement both numerically and in its skills. This had led to a growing reliance on extended journeys to work from beyond the core area resulting in traffic congestion because of the inability of public transport to serve an increasingly dispersed catchment, and of rising house prices that were exacerbating problems of affordable accommodation.

The Study's Recommendation

In the light of these strategic issues it could be assumed that the study would have analysed the particular economic, housing, social, travel to work and environmental problems which had been identified and proposed solutions to rectify or reduce their adverse impact and achieve a more sustainable balance both within the sub-region and in its relationships with its neighbours. Instead the study has recommended a policy of higher economic growth, the effects of which would be:

- to increase the sub-region's dependence on commuters from outside its boundaries from 15,867 in 2001 to 28,523 by 2021 – an increase of 92%.,
- to require the construction of 23,156 new dwellings over the period from 2003-2021, which is 8,808 more than the currently identified supply of suitable land based on outstanding planning permissions, allocations and the results of urban capacity studies.

The recommendation was made following an analysis of three other economic scenarios:

- a continuation of existing trends projected to 2021 that would have stabilised the dependence on inward commuting and a need for 12,555 new dwellings that could have been accommodated within the currently identified supply of land;
- 'economic exposure' that assumed the closure of at least one major employer, and general contraction which was described as being unacceptable;
- 'planned growth' which assumed continuation of current RPG policies (2003) and those for Wales, (1996 based), that also stabilised the dependence on in-commuting but produced a housing requirement for 24,524 dwellings which is 10,276 more than the identified supply, principally in North East Wales.

Jobs and Labour Supply

The detailed implications of each option on the balance between jobs and labour supply within the sub-region are shown in figs. 71-79 of Chapter 6 but are more conveniently summarised in figs. 91a,b,c, (which exclude the economic exposure option). The figs. show for each District the margins of difference between labour supply and employment in 2021, and these are compared with the difference on 2001 below.

In particular, the tables show that under the high growth projection, Chester's dependence on in-commuters from outside its boundaries would increase by 5,742; Flintshire would experience a reversal of balance from a small surplus of labour to a deficit of 5,737; Wrexham would accrue an increase in its small deficit to one of 2,295, while only Ellesmere Port and Neston would have a surplus of available labour of 1,050.

The study has not examined the degree to which commuting between Districts would change under the high growth scenario but it is abundantly clear that as a whole it would be necessary to attract almost twice as many commuters from outside as at present, in addition to inter-District commuting.

Housing

Fig. 92 (page 137) of the report sets out the derived dwelling projections from 2001 to 2021 for each of the three economic options and these are translated into housing land requirements in fig. 93. This figure states in the first line the total number of dwellings in each District in 2001 and then, by adding completions for 2001-03, gives the total number of dwellings for 2003; this total is then compared with the projections for 2021 to give the residual requirement for the end of the period. Finally, reductions are made to this residual by deducting dwellings that could be built on sites with outstanding planning permissions, windfall allowances and those sites identified in urban capacity studies; the resulting figure being the requirement for further allocations.

In summary, the analyses show that for Chester, the higher economic growth scenario would require additional land to be found to accommodate 1,384 dwellings but that sufficient land has already been identified to accommodate both the existing trends and planned growth options.

For Ellesmere Port and Neston there is sufficient identified land to accommodate the existing trend option but there is a shortfall against the higher growth scenario of 1,184 dwellings and of 858 dwellings against "planned growth".

**COMPARISONS OF PROJECTED
LABOUR SHORTAGE 2021 and 2001**

Option 1 Existing Trends

	Labour	Employment	Labour shortage 2021	Labour shortage 2001
Chester	53,803	70,995	-17,192	-15,799
EP and N	36,604	33,942	2,662	0
Flintshire	81,912	83,834	-1,922	0
Wrexham	61,752	61,070	682	0
Total Shortage			-15,770	-15,867

Option 2: Higher Growth

Chester	56,466	78,007	-21,541	-15,799
EP and N	38,409	37,359	1,050	0
Flintshire	85,732	91,469	-5,737	0
Wrexham	64,688	66,983	-2,295	0
Total Shortage			-28,522	-15,867

Option 3: Planned Growth

Chester	54,605	72,053	-17,448	-15,799
EP and N	38,003	35,239	2,764	0
Flintshire	87,110	89,154	-2,044	0
Wrexham	68,038	67,286	752	0
Total Shortage			-15,977	-15,867

NB 0 represents a small surplus or shortage

Flintshire has a shortfall of land against all three options of 4,079 dwellings against existing trends, 7,269 dwellings against higher growth and of 7,969 against planned growth.

By contrast, Wrexham has a surplus of identified land above existing trends of 3,739 dwellings and of 1,029 for higher growth but a deficit against planned growth of 1,771 dwellings.

The report does not explain the reasons for the deficits being much higher in the Welsh districts other than to suggest, in para. 7.20, that there are crucial differences between the authorities as to how the urban capacity studies have been undertaken, and also between the two English authorities.

Acknowledged Implications of a Higher Economic Growth Strategy

The study report acknowledges that the recommended policy of higher economic growth would pose a number of issues for the sub-region that will need addressing:

- There would be a significant increase in the excess of employment over labour supply, 28,522 persons in 2021 compared to 15,867 in 2001, thereby substantially increasing commuting into the sub-region (para. 6.37).
- There would be a significant increase in commuting between Districts within the sub-region but comparisons of the modal split of journeys to work in 1991 and 2001 had shown that the use of sustainable modes of transport for journeys to work experienced a decline in the 10-year period with 14% fewer people walking or cycling and public transport use decreasing by 2% while private vehicle use increased by 30% (para. 5.83 and fig. 70). Consequently, it is important to enhance transport accessibility throughout the sub-region and to provide more effective means of accessing employment areas (para. 8.33).
- The projected growth in employment (12.7%) would far outstrip the local labour supply available, which is the converse of the position in the Milton Keynes – South Midlands and London – Stanstead – Cambridge sub-regions that are identified for economic growth for which sub-regional studies have been undertaken (paras. 6.40 – 6.51 and figs. 86 – 88).
- Because of the high levels of employment there is little slack in the labour force to reduce the dependency on commuting from outside the sub-region; consequently action is needed to access the potential of the latent supply of labour of those who are economically inactive, including those logistically dislocated from job opportunities. There is also a need to address skills shortages. However, these proposals would require concerted action over a sustained period of time, perhaps ten years or more (paras. 4.83 and 8.38).
- There would be a need to allocate substantial amounts of land for housing especially in Flintshire, where the implied increase in population would place a considerable additional burden on the delivery of public services, particularly health (para 7.7). In Chester the additional housing would still fall short of that required to keep pace with the higher growth scenario thereby leading to higher levels of in-commuting and exacerbating problems of congestion and infrastructure capacity (para 8.25). Providing land to meet these requirements would have implications for green belts/green barriers (para 8.22).
- The increasing shortfall of housing provision against employment would lead to increased house prices that would exacerbate the problems of providing affordable accommodation (paras. 3.42-44 and 7.27).

Comment

These are weighty problems but they are not new; they are the same as those identified by the strategic authorities who recognised the need for the study. In each case the implementation of the recommended higher economic growth option would intensify the problem. Indeed, the only additional information concerning these problems that the study has produced is the critical lack of identified housing land in Flintshire to meet its own economic growth needs regardless of accommodating the housing growth arising from economic growth in Chester (para. 8.28). This would suggest that Chester's growth is exacerbating an existing local problem and would continue to do so under the higher growth scenario.

No Consideration of ‘Capacity’

In recommending the higher growth strategy, the study report has made no attempt to assess the ability of the area to accommodate the extra requirements let alone of its environmental capacity. This although the fourth bullet point of its objectives (para 1.6) implies that some analysis of the “sustainability” of its options was required, while the fifth bullet point (para 1.14) suggests the need to examine each option in terms of sustainability. No account has been taken of physical or environmental constraints and the study has considered “capacity” only in relation to the currently identified supply of land for housing. Certainly it falls well short of the WSP requirement that seeks “*to identify the social, economic and environmental potential and capacity of this area*” (our underlining); it does not address the intentions of para. 3.32 of RPG 13 that “*the assessment should inform the adoption of policies and actions which would establish a more stable and sustainable relationship between the component local planning authorities of the sub-region*”; nor does it “*distinguish between cross-border economic needs and opportunities that would accord with the approach in the emerging (now approved) RPG*” as advocated by the NWDA.

An Economic-Led Study

The irrefutable fact is that the study has been economic led; the three Strategic Options described in para. 6.1 make this quite clear. Despite acknowledging that the preferred option of higher economic growth with social inclusion will exacerbate the current problems of the mis-match between employment needs and supply; increased and longer travel to work; more, but insufficient numbers of dwellings, and a worsening of housing affordability, para. 5.1 of the Executive Summary states:

“Recent evidence of output and employment growth for the sub-region suggests that it is the higher growth scenario presented in the study, which reflects the current position at 2003. It is therefore reasonable to conclude the higher economic scenario with social inclusion option is realistically achievable and should remain the aspiration. Yet this scenario is only achievable if the appropriate economic, physical and human infrastructure is tackled in a strategic and co-ordinated manner.”

It should be noted that this final sentence of para. 5.1 uses the word “infrastructure” and refrains from using the terms “environment” and “sustainability”. Nevertheless, the actual recommendation does include both words and is:

“The preferred economic growth option for West Cheshire – North East Wales is defined by the higher growth with social inclusion and environmental sustainability scenario”. (Our underlining). (Para. 8.3).

An Incomplete Study

However the conclusions in the report and its main recommendation are read, the addition to the recommendation of the words “and environmental sustainability” appear as an after thought; as a late reflection on the implications of the fourth bullet point of the objectives of the study, the expectations of the WSP and the requirements of RPG 13. In effect, para. 5.1 is saying that from the economic point of view this is what we want, provided that it is environmentally sustainable; and one should then add “but we don’t know whether it would be”.

This is clearly an economic-led proposal and not a comprehensive analysis of all the social, infrastructure and environmental factors that need to be brought together to produce a sustainable strategy and spatial plan for a sub-region. As such it cannot be assumed to be the guide, or even the preliminary or draft guide for the future planning of the sub-region; it is a bid for the sub-region that fully admits to the problems that would be incurred: essentially it seeks to promote itself and does not consider the implications of its proposals on its neighbours or for the wider regional strategies.

Disregard of Interaction with Regions

Chapter 8 of the report contains frequent references to the four Districts as “a quite distinct, coherent and functional sub-region” in economics, housing market and travel to work terms (paras. 8.4–8.6 and 8.8), but this assertion begins to weaken as the implications of the higher economic growth option in relation to the housing market and journey to work are explored in the paragraphs on a spatial strategy for the sub-region (paras. 8.17-8.24) and on planning policy (paras. 8.25-8.34).

The analysis begins by asserting in para 8.17 that:

“The distribution of economic growth should be the key determinant of the locations for future housing development if a sustainable spatial strategy is to be pursued whereby travel to work distances by car borne traffic are minimised.”

The discussion then develops to suggest that one approach to formulating a sustainable strategy would be to direct new housing towards the growth areas of Flintshire, Wrexham and Chester. However, it concedes that this would underplay the role of public transport in improving accessibility to these growth areas from those areas in greatest need of regeneration, particularly Ellesmere Port, Wirral and Denbighshire but also parts of Wrexham and Chester. The principal public transport corridors are the Chester – Ellesmere Port corridor (M53 / Bidston-Wrexham line), Flintshire – Chester (A55 / North Wales Coast line) and the Chester – Wrexham corridor (A483). It is therefore suggested that development could be directed to these corridors in line with the sequential approach to the release of land with implications for Green Belts / Barriers.

The Chester Problem

At this stage (para. 8.25) the discussion returns to the growing mis-match in the sub-region and particularly in Chester that will generate increased levels of in-commuting unless local residential land supply constraints can be addressed and/or public transport accessibility into Chester enhanced.

This leads to posing the question *“of whether higher economic growth in Chester and indeed Ellesmere Port and Neston could or should be supported through housing development in Flintshire or in Wrexham [or] as an alternative proposition, could economic growth in Chester and Ellesmere Port and Neston be supported through housing development in Merseyside”*.

Housing development in Flintshire and Wrexham to support Chester is dismissed because of the *“massive shortfall in housing land to meet its (Flintshire’s) own economic growth needs”*. Para 8.29 then asserts that *“there is a clearly defined housing market that includes Wirral, Ellesmere Port and Neston and Chester whereby the investment decisions taken in one area will have a tangible effect in another”*. Para. 8.30 then advises that, in regeneration terms, study partners should carefully consider the impact of new housing development in Chester and Ellesmere Port and Neston upon the adjacent Housing Market Renewal Pathfinder area in Merseyside.

It concludes that:

“Study partners should investigate the potential for linking areas of opportunity with areas of need, including potentially diverting housing investment towards the NWMA and further towards the Housing Market Renewal area of Merseyside which includes inner Wirral. By extension, the potential for diverting housing investment towards the areas in need of regeneration in Ellesmere Port, particularly where this helps to support the regeneration of the town centre, warrants further investigation”.

In other words, the economic development of Chester should be supported by building more houses in the NWMA of Wirral and encouraging commuting by public transport (to wherever the employment was available).

In the light of the above discussion, the study report recommends that:

- The sub-region should be extended to include Denbighshire and Wirral where specific issues arise.
- The spatial implications of growth need to be addressed through a coordinated and agreed strategic approach.
- The study begins to inform the review of planning, economic and housing policy across the sub-region from national and regional level to the local level. This will be part of an on-going process that, over the next 12 months will be further informed by the preparation of a robust and inclusive sub-regional strategy.

An Enlarged Sub-Region

Two key points arise from this discussion of the impact of the higher economic growth scenario:

1. That the spatial implications cannot readily be accommodated within the sub-region without quite massive investment in improved and additional infrastructure, the costs and phasing of which have not been assessed, and the release of land, particularly in Wales for housing.
2. That the economic growth will have an increasing impact on the future planning of Denbighshire and Wirral which will assume a greater role as residential dormitories for the sub-region.

Both points support the view that the recommendation of a higher economic growth scenario should not be assumed to be the most appropriate without considerably more investigation.

Lack of Consideration of Regional Strategies

Apart from the reference to the Housing Market Renewal Pathfinder area in Wirral and, perhaps, to investment decisions taken in one area having a tangible effect in another, (para. 8.29 which could be taken as a 'nod' towards RPG 13 policy UR8), Grimley's report makes no mention of the wider regional planning guidances on either side of the national boundary, nor to the North West's 'Action for Sustainability' programme. It is self-centred and neither its objectives, as defined in para. 1.6 nor its approach (para. 1.14) give any suggestion that it would consider any interaction with the broader region. Appendix 1 gives a brief and selective summary of RPG 13 policies but the policy context is ignored in the text; even the planned growth option is explained only in relation to dwelling requirement without reference to the economic strategies of promoting social inclusion (DP4, UR3) and of rectifying the economic imbalance between parts of the region through economic regeneration (EC6 with its specific commentary on North Cheshire and the changing focus of key sector employments).

Not a Self-Contained Sub-Region

The report makes frequent assertions that in economics, housing market and travel to work terms, the study area is a quite distinct, coherent and functional sub-region, (e.g. para. 8.4). However, the truth is that it is not; it relies to an ever-increasing degree on in-commuting, it is having increasing difficulty in accommodating a growing population, is becoming socially imbalanced and one of its proposed solutions is to extend its sub-regional boundaries to embrace Denbighshire and Wirral for certain functions. There are also clear concerns within the sub-region itself of the domination that Chester exerts in regard to retail, administrative and leisure functions.

Conversely, at the regional level, there is consensus that continued growth of the Chester economy, and that of north Cheshire is hindering the regeneration of the NWMA and that it should be restrained for the greater benefit of the region. The WSP fully recognises the importance of the sub-region to the Welsh economy but also sees it as a means of regenerating the economic and social welfare of the coastal towns and those of the Dee Estuary; it also wishes to develop Wrexham as a regional centre thereby strengthening the neighbouring former mining settlements.

The Wider Importance of Transport Routes and of the Environment

It is false, therefore, to assume that the four Districts can be regarded as a self-contained sub-region. It lies astride national and inter-regional roads and railways and cannot, therefore, regard them as their prerogative to exploit as they wish. More significantly, however, the quality of the landscape and environment within the Districts is of regional, and in some respects of international, importance; its value being more than intrinsic but of image that promotes the wider regions of England and Wales as places to visit and in which to invest. Para. 2.1 of RPG 13 states:

“In the past, the tendency in the North West has been to trade environmental degradation for economic prosperity, leading to numerous, critical environmental problems which detract from the region’s image and longer-term prospects. Economic prosperity must be nurtured, but the region must also protect and enhance its environmental assets. Conserving and enhancing the natural and built environment, bringing areas of environmental dereliction back into productive use, minimising the environmental impact of future development and securing sustainable growth and more social inclusion are all key to achieving more prosperity and a much better quality of life in the North West”.

The Economic Options Are Not Individually Exclusive – Differing Regional Strategies

The study considered the four options (including economic exposure which was rejected) as strict alternatives, complete in themselves and to be applied across the sub-region without variation. However, the two national / regional approaches adopt different strategies; on the English side, Chester is to be restrained in favour of growth in the NWMA as is the western part of Ellesmere Port and Neston, while Ellesmere Port town itself is included within the policies for the NWMA, but on the Welsh side growth is encouraged both for the benefit of the two Districts and as a means of regenerating the towns to the west; there is also a desire to diffuse Chester’s growth potential into Wales and redress the imbalance of cultural, retail administrative functions between in and Wales.

Contradiction With RPG 13

Paras. 8.25 – 8.30 of the report acknowledge the potential adverse effects on the sub-region of higher economic growth in terms of housing, affordability, travel to work and congestion but the suggested solution of decanting housing requirements to Wirral flies directly in the face of the RPG policies to stimulate economic growth in that area as part of the NWMA. Furthermore, the report appears to assume that the higher economic growth option is the only one that includes social inclusion (para. 8.2) but this fails to acknowledge the policies in RPG 13 for such inclusion that apply to all areas irrespective of the approach to economic growth (Policy DP4); indeed, they are particularly relevant where, as in Chester, the economic policy is designed to meet the needs of the local population (Policy UR3).

Distinction Between Planned Economic Growth and Higher Economic Growth

It is clear, therefore, that a strategy of planned growth that is based on current planning policies must also include a social inclusion outcome that contributes to the “planned economic growth” (as distinct from “higher growth”) and which also includes environmental sustainability.

In other words, the two options differ only in the extent to which their different economic growths would impact on the acknowledged problems of housing requirements, affordability, travel to work, infrastructure, the environment and its neighbouring Districts.

In all of these respects the comparative analysis in the report demonstrates that the planned growth scenario can be more easily accommodated. In particular, there would be a reduction in the housing requirement of 1,715 and of the imbalance between jobs and labour supply of 3,093. Furthermore, the scenario would be accommodated within the identified supply of land.

The Impact of Planned Growth for Chester on the Sub-Region

There is nothing in the report to suggest that the rest of the sub-region would suffer if the planned growth scenario was adopted for Chester; the Chester image, so graphically described in paras. 4.99 and 4.100 would remain, but the opportunity for its economic attraction to be diffused into the sub-region could be given an extra stimulus:

- In Ellesmere Port and Neston the employment site at Hooton would deliver High Local Services within the NWMA and there are several other sites that are suitable for mainstream and high tech manufacturing and also for processing industries that are, or could be, brought forward within the short and medium term.
- The Wrexham Technology Park is suitable for high level services in the short to medium term and the Industrial Estate would attract mainstream and high technology manufacturing sectors following improved access.
- Flintshire has the greatest potential range of sites for employment uses and the WDA is taking a pro-active role in bringing them forward.

The Chester Image

Para 4.100 of the report states:

“the scope (for diffusing Chester’s image) in terms of business and investment appears largely untapped and an important opportunity if developed in consultation, marketed appropriately and delivered in partnership; the scope to develop European headquarter-based opportunities would seem particularly relevant”.

Some consideration of this possibility clearly took place during the preparation of the report and as para 4.100 records:

“The City Council has shown a strong, almost philanthropic willingness to share these opportunities with willing partners {and} informally it is doing so already in terms of the retail sector”.

A restraining strategy in Chester based on RPG policies would seem to be an appropriate means of focusing higher growth in the other Districts to achieve a better balance in their socio-economic structure. But this was not considered further in the final report and does not feature in the recommendations.

This leads to a consideration of stakeholders’ individual aspirations, and particularly those of Chester City.

The Chester Problem

Chester is proud of its image and heritage; high GDP, low employment and the pace of redevelopment of its inner areas. It recognises its strengths in attracting major offices and high tech investments together with their consequential demand for housing, retail and leisure facilities, and it will fight against any policy that threatens its progress and embrace anything that is in its favour: it has embraced the higher economic growth strategy and in so doing has rejected the RPG 13 and the Cheshire Structure Plan Alteration.

Chester's Housing Provision

At the recent examination in public of the Cheshire Structure Plan Alteration, the City denounced the need for a Structure Plan review and rejected the RPG 13 as being "flawed" and shortly to be superseded in the light of up to date information including the West Cheshire/ North East Wales sub-regional study, the Northern Way, the Barker Report and the emerging urban potential studies. (Chester City submissions Issue 1 recommendation; Issue 3 recommendation and para. 2.11 and others).

Like most Cheshire Districts, Chester ignored the housing requirements in the current Structure Plan and has continued to grant planning permissions substantially above those required to comply with those in the Draft Alteration that are derived from RPG 13 policy UR7. Indeed, by October 31st 2004, completions and outstanding planning permissions granted or subject to legal agreements equate to 3,327 dwellings against a total requirement of 3,300 for the whole of the Plan period from 2002-2016. In addition, there were allocations for a further 730 dwellings which, the City informed the panel at the examination in public:

"are priorities for the Council in delivering its regeneration objectives The Council will not be minded to delay developments on those sites to meet the targets in the Draft CSPA" (para. 2.11 Issue 3).

Furthermore, the City informed the panel that its actual housing requirements for the period to 2016 were for 4,500 dwellings and consequently they sought an increase of 1,200 dwellings above the 3,300 proposed by the County.

It should be noted that a requirement for 4,500 dwellings over the 14 years from 2002-16 would maintain the recent average annual building rate which, at 321 equates with the annual requirement of the higher economic growth scenario of 315 d.p.a. over the 19-year period 2001-21.

Thus, Chester is already adopting the higher growth scenario and by securing a total provision of 4,500 dwellings by 2016 would require the provision for only another 1,158 dwellings in the remaining five years (fig. 93 of the study report). In any event, the City has stated its firm intention to ignore any rejection of its representations at the examination in public and will continue to grant planning permissions to suit its own assessments unless it is stripped of its power to do so.

Chester's Employment Policy

The moot point is whether Chester would adopt the same approach to economic development or whether it would accept the restraint implicit by "planned growth". If the willingness to promote economic diffusion expressed in paras. 4.99 and 4.100 is genuine, then restraint could be a distinct possibility. There are certain benefits to the City in such an approach. The current surplus of jobs over labour supply in Chester does not support the thesis that more jobs are required: quite the reverse.

Under the planned economic growth scenario Chester's labour requirement would be for 72,053 employees which, when set against the labour supply resulting from a higher growth working population of 56,466 would leave a shortfall of 15,587. This would be 5,954 less than the shortfall from higher economic growth and, in fact, 212 less than the present shortfall. This would have substantial beneficial effects upon travel to work issues both between Chester and beyond the sub-region, and within it.

A restraint in Chester District to "planned growth" does not imply "no growth" but growth that is matched to the needs of the existing population and enterprises. The City's image would remain as an inducement to attract employment into the neighbouring higher growth Districts with consequential benefits to both them and Chester. It would help to readjust to imbalance within the sub-region, promote the regeneration of Ellesmere Port, and promote the regional strategies of the WSP; it would comply with the spatial strategies of the RPG.

Flintshire

It is by no means certain that it will be environmentally possible to accommodate the full weight of a higher economic growth strategy in the sub-region or in the three Districts with "planned growth" in Chester.

The problem is likely to be most acute in Flintshire.

The study recognised the considerable additional burden on the delivery of public services, particularly health, resulting from the assumed increase in population in Flintshire and Wrexham but also the shortage of identified building land to accommodate Flintshire's need for houses. It may, however, be possible to transfer some of the employment and housing requirements from Flintshire to Denbighshire where the coastal towns need regeneration (in addition to those in Flintshire along the Dee coast). Wrexham appears to have a surplus of housing land over that required by the higher growth projection. Some transference to that District may be more environmentally acceptable, reduce travel to work, help to regenerate the former mining settlements and advance Wrexham's status as a regional centre.

Managing Economic Growth

The underlying justification for undertaking the study was to seek joint solutions to the problems facing the four Districts and this implies a willingness to work together especially in respect of economic development which is acknowledged to be the principal issue.

If a sub-regional strategy is to succeed therefore, the local authorities need jointly to identify principal employment sites for identified markets and a phasing mechanism for their release and development. This would need to be supported by both Development Agencies, and with National and Regional Assemblies in regard to planning and infrastructure matters. The distinction would need to be made between the provision of employment for local needs that would remain as District matters and those of a sub-regional nature that would involve all Districts, Agencies and, where necessary, with the Assemblies. The Assemblies' involvement, especially that for the North West, would be particularly necessary to ensure that developments in identified key sectors that should be located within the NWMA were not diverted away unnecessarily.

Conclusion

This study has been economic-led and produces a series of recommendations that promote a higher economic growth than is currently envisaged for it in RPG 13 but which conforms generally with the economic strategy of the Wales Spatial Plan.

It is not a spatial strategy for the sub-region but a desk study of one aspect (highly significant in itself) and of certain related topics for which it produces a picture at the end of 2021. However, it does not attempt to describe the position at intervening stages; there is no phasing and no assessment of the extent to which the economies of the four districts can integrate.

The study has not considered whether the infrastructure of the sub-region is capable of accommodating the levels of growth that are recommended or of the costs or environmental consequences of achieving compatibility.

The broader impact of development on the environment has not been investigated.

The study has looked at the sub-region as a single unit and has not examined the inter-relationship of the four districts either at present or more importantly in the future. It has identified the broad differences between Chester's economy from the other Districts, especially Flintshire, and has recognised that the City's dominance has caused certain economic and housing problems but it has not proposed how they may be tackled. Its recommendations assume that all four will pursue the same policy of higher economic growth with social inclusion. However, its analysis demonstrates that many of the principal problems affecting the area will be exacerbated.

Nor does the study relate the sub-region to its wider region or analyse the impact of its recommended economic policy on the wider region and its strategic policies.

These are weighty criticisms but while they do not invalidate the study they do mean that it must be seen for what it is – an analysis of a major, but not the sole, element of the matrix of the West Cheshire/ North East Wales area. It is not a plan for the area and it is certainly not the basis upon which a plan should be presumed.

It is a high bid that says “if you follow me this will be the position in 2021 in terms of jobs created, available workforce, travel to work and numbers of houses built; it is for you to work out how we get there and at what cost financially, and to the environment”.

CRITIQUE OF THE RSS OPTIONS PAPER APPROACH TO WEST CHESHIRE/ NORTH EAST WALES

Lack of Public Information/ Lack of Clarity

The RSS Options Paper launched by the NWRA on March 8th invites consultees to choose a strategic option, or combination of strategic options, to determine the spatial framework for an area (West Cheshire/ North East Wales) which is still the subject of detailed study. Unlike all the other emerging sub-regional strategies, no final report on the first detailed proposals has since been published. Consequently, the average consultee/member of the public who has not been a party to the earlier work in West Cheshire and North East Wales knows only what the one and a half pages of A4 text in the Options Paper tells them.

Paragraph four of the text on West Cheshire and North East Wales (ref. 3.6 of the Options Paper) states that, although the second study is at a very early stage, it has identified a range of initial options for further development and debate (presumably options A, B and C) but that further work “*may lead to the proposal of a hybrid option that incorporates elements*”. Whether this refers to elements of A, B or C, or elements from the rejected options referred to in the bracketed NB at the end of the fourth paragraph, or to elements that may be revealed through the study, is uncertain.

The bracketed NB says that the rejected options were focused on:

- Development plan-led growth
- Principal growth areas
- Key settlements
- Dispersed growth with regeneration.

However: ‘A’ is described as ‘Principal Growth Areas plus Social Inclusion’ (without an explanation as to how does this differs from the second rejected option)
‘B’ is described as ‘Growth Corridors’ (without an explanation as to the extent that this differs from ‘dispersed growth’) and
‘C’ is ‘Pyramid Growth’ which appears to be a variation of key settlements.

No account is given about the criteria used for selecting individual options or for rejecting them. Nor does the text in the Options Paper define what is meant by “growth”, although it is assumed this means ‘economic growth’.

Two Different Definitions of Growth?

The published Grimleys study recommended that:

“the preferred economic growth option is defined by the higher growth with social inclusion and environmental sustainability scenario”.

“Higher economic growth” was defined in para. 6.18 of the study report as 1% annual increase over the period 2011-2021 over and above existing TEMPRO employment trends plus 0.5% increase per annum over the period 2011-2021 over and above existing TEMPRO labour supply trends. The additional 0.5% increase in labour supply was intended to account for increased social inclusion and success in attracting the latent workforce into jobs. By using the TEMPRO-based calculations the study was able to assess the future level of jobs and local workforce, and hence the dependency on travel to work from outside the sub-region, as well as the number of dwellings that would be required. The application of these calculations of the higher growth scenario to each District demonstrated the degree to which the option reacted to the problems that currently afflict the area.

It is clear, therefore, that if the RSS definition of growth is different from that used by the study, then it is not possible to predict how many jobs would be created, or the available labour supply, the consequences for travel to work or how many dwellings would be required. Furthermore, if social inclusion is not a part of the definition then it is not possible to assess options B and C.

The study report also applied TEMPRO to the Districts individually, and consequently the calculations assumed a continuation of their current economic make-up. Para. 6.19 of the study report also states that, *“The assumption has been made (for labour requirements) in the absence of any bespoke economic forecast data for the target sectors”*. This further complicates calculations of the impact of options B and C and the introduction of hybrids or diffusing growth from Chester.

All of this uncertainty gives cause for genuine concern because, although the recommended option of higher growth included the caveat of “environmental sustainability”, it did not undertake any assessment of that criteria. It is even more disturbing that none of the options now offered refer to the environment and, of course, that statutory obligation to do so is still unfinished.

Inconsistencies with Liverpool City Region

The Grimleys study report consistently considers the sub-region to be a distinct unit and does not address its relationship with the wider regional contexts of either side of the border, particularly on the English side where it abuts (and in Ellesmere Port includes) the NWMA. However, the RSS Options consultation document includes details of other sub-regional and ‘City Region’ studies and describes options for each. In this respect, that for the Liverpool City Region is particularly important since, of its three options, the second is for *“unrestricted economic growth – market led approach”* which would mean growth *“to the south of the City region around Chester and the M56 corridor as these tend to be the most attractive locations for businesses, investors and residents”*. However, the RSS statement advises that:

“Sustainability appraisal is currently being undertaken on these options but, from the brief appraisal, featured in the first detailed proposals, option C (Sustainable economic growth: regeneration focus) would be the preferred option for the Liverpool City Region”.

There is, therefore, an obvious clash between the two adjacent studies. Liverpool, with its Objective 1 status and City of Culture designation, should quite rightly continue to be the focus of inward investment for some considerable time to come. Allowing finite economic pots to be dissipated more thinly, and particularly to be used in a way which would affect economic growth in the Liverpool Merseyside City Region, is not going to achieve the urban regeneration which this area so desperately needs.

Furthermore, the two questions that are asked for the City region in the Options Paper are much more searching than the single question for WC-NEW; the first asking whether the first detailed proposals developed by the strategic planning authorities reflect the key issues that need specific sub-regional policies in the RSS, while the second asks if consultees agree with the preferred option and, if not, which option or combination of options they would choose.

It should be noted that the same questions are asked of the other City and sub-regional studies whereas only the second question is posed in the Options Paper for West Cheshire and North East Wales. In other words, consultees are not being given the opportunity to comment, in the electronic responses they are encouraged to make in preference to hard submissions, on whether or not they consider the first study’s proposals reflect the key issues that need specific sub-regional policies.

As CPRE has argued earlier in this submission, it does not believe the case has yet been made.

Process Failures

It is entirely inappropriate that consultees are being invited to choose an option, or combination of options, for a West Cheshire/North East Wales Sub-Regional Strategy when there are so many gaps in available information and when the holistic case for having such a strategy has not been made.

It is also remiss that consultees are not even asked to state the reasons for their choice or the criteria they have used in assessing the options – ranked or merely listed.

A reading of the Grimleys study report and the references to regional and local reports that led to its inception demonstrate the problems of deficiencies in the labour market, high dependency on in-commuting, comparative decline in the public transport system, high house prices and increasing lack of affordable homes, imbalance in the provision of retail and leisure facilities and the dominance of Chester. Yet the recommended option does not arrest these problems - indeed it exacerbates them - and it fails to consider whether they can be overcome and, if so, at what environmental and financial cost. There is no certainty that promoting high economic growth in Chester would 'reduce the need to travel', a key component of the region's Action for Sustainability (AfS) programme, and the likelihood of more people being encouraged to commute long distances is ignored.

Although the Grimleys report does not dwell on the Office of the Deputy Prime Minister's 'Northern Way' concept, or the deeply flawed Kate Barker report which informed it (and against which CPRE have produced a damning rebuttal), it is clearly deeply influenced by it. Yet this again is an entirely economic-led initiative which gives no credence to wider environmental issues. The 'Northern Way' action plan, which covers North Cheshire, has been worked up in camera and without any democratic input and yet it is being used to drive a series of sub-regional strategies including this one.

CPRE Cheshire Branch has grave concerns over the approach being taken to the West Cheshire/ North East Wales area. An inwardly-focused economic-led study which takes no account of the needs of the North West Metropolitan Area or the wider environment is threatening to overturn those aspects of RPG 13 which seek to focus inward investment in the metropolitan areas and to protect North Cheshire. And this cataclysmic change is being inadequately consulted upon and forced through in a timescale which is grossly inadequate for proper consideration of all the issues. The impact of none of the options can be properly understood through an examination of the Grimleys study report or the extent to which they address the key issues that underpinned the reason for the study.

VIEWS OF CPRE CHESHIRE BRANCH

CPRE Cheshire Branch believes that the sustainable way forward would be to reduce the dominance of Chester in the sub-region by limiting its economic growth, as already intended in the extant RPG. This would assist with the regeneration of Ellesmere Port in particular and with the neighbouring 'city region' of Liverpool and would benefit the wider North West Metropolitan Area and North East Wales. It would divert growth to Wrexham, which appears to have the capacity and ability to become a complementary regional centre for North East Wales and it would help remove pressure from the Green Belt around Chester.

Chester City has been adopting a deliberate policy of flouting the Cheshire Structure Plan and RPG requirements for constraint by allowing housebuilding to rage out of control. This is reprehensible and yet, oddly, there does not appear to have been any actions taken against them to force them to desist. However, provided the City can be stopped from expanding onto green fields, the additional houses for which permission has been granted could help reduce the amount of commuting necessary to meet the labour supply shortage.

CPRE has serious doubts concerning Flintshire's ability to accommodate the higher growth scenario, especially in respect of the housing requirements, although these appear to be just as severe under planned growth. Part of this could be deflected to Wrexham but the solution may lie primarily in dispersal to West Wales and the coast as suggested in the Wales Spatial Plan.

This would constitute a more sustainable package and one that attempts to address the key issues affecting the area. It also has a greater regard for the regional policies. The basic arguments on which they are based have not fundamentally altered since RPG 13 was adopted.

Finally, CPRE would argue that before any strategy is recommended for West Cheshire and/or North East Wales, a far more robust evidence-base needs to be gathered which includes social research and a strategic environmental appraisal as well as an economic impact assessment over a much wider area. There also needs to be far greater consideration given to evolving strategies for adjoining areas and to the potential effects of any proposals on adjoining areas and on the whole of the North Cheshire area currently protected by special RPG policies.

Consequently, CPRE's stance does not comply with any of the three options offered in the RSS Options Paper.