

THE ROYAL TOWN PLANNING INSTITUTE

‘FRAMEWORK FOR JOINT ACTION’

THE DRAFT NORTH WEST CHESHIRE – NORTH EAST WALES

SUB REGIONAL SPATIAL STRATEGY

Memorandum of observations to the Welsh Development Agency on
the consultation paper

February 2006

GENERAL COMMENTS

1. Both the joint strategy and the joint approach taken to address the interests of both West Cheshire and North East Wales are welcomed. There are clearly many important linkages across this area and common influences on its future which are recognised in the draft strategy and we hope that the strategy will act as a blueprint for further cross-border working. However, there are also distinctive features which will distinguish different parts of this area, both now and in the future. As such, the document is somewhat ‘bland’ – lacking local colour and distinctiveness, particularly in terms of heritage, language and culture (e.g. not recognising the important and now strengthening position of the Welsh Language in parts of North East Wales). Although the sub-regional spatial strategy sustainability appraisal report in the appendix does pick up on the issue of language and culture, this content should appear in the main sub-regional strategy document.
2. The broad approach is a standard one that comes across as a largely economic focussed development document, applying a ‘general model’ to the area. A stronger approach might be to strengthen the local resources and character base.
3. Clarification would be useful of how far the sub-regional spatial strategy differs from the current collection of individual constituent local development plans/documents.
4. There are also certain differences of policy due to the existence of the National Assembly for Wales, including the Welsh Development Agency which is to be incorporated into the Assembly in April. Again, the existence of both the common and distinctive characteristics across or in different parts of the area should be recognised.
5. It is considered that the draft is somewhat weak on the contribution of the large rural hinterland, which is an important element of the total spatial strategy.
6. There is some confusion over sustainability contributions, including distinguishing between environmental sustainability and the wider definition of the term (referred to in more detail in the comments below).

DETAILED COMMENTS

Executive Summary

7. We welcome the recognition given to 'People, Places, Futures' – the Wales Spatial Plan throughout the text of the document. It acknowledges that this sets a strategic direction for Wales and for its distinctive areas such as North East Wales, as well as recognising the need for constructive cross border relationships. However, this should be stated early on in the document and in the Executive Summary.
8. Similarly, the Introduction should recognise that for North East Wales, the strategy has been prepared to take forward the Wales Spatial Plan.

The Broad Vision

9. The draft Vision states that growth will be pursued to the benefit of the area itself and the 'Liverpool City Region.' The basis for the reference to the Liverpool City Region is unclear – especially as the Introduction does not list it in the areas for which there are strategic implications. It would be unacceptable in Wales to retain a reference to growth in North East Wales benefiting the Liverpool City Region but not also recognising the importance of a successful North East Wales economy to other parts of North Wales.

Key Principles

10. The suggestion that there be a clear identity for the sub-region should be balanced by recognising that there are already distinctive characteristics in different parts which should be safeguarded and enhanced.
11. The document refers to 4 strategic centres including Deeside, yet it is not clear what that term means. It may mean the Deeside Industrial Park and the Shotton employment site or it could also include adjacent towns such as Queensferry, Connahs Quay and Sealand. If it is the latter then a much broader set of considerations and proposals would need to apply than those presently set out which only deal with the employment dimension.
12. The final point would cover all transport aspects whilst emphasising the importance of public transport if it read "promote and develop an integrated transport system with an important role for public transport."

The Spatial Strategy

13. This lists a number of strategic directions which generally accord with the approaches for North East Wales set out in the Wales Spatial Plan. However, there are some omissions which should be rectified:-
 - The strategic rural dimension appears rather thin and poorly developed, given the size, scale and nature of the rural hinterland. Whilst it is recognised that "a large part of the sub-region is rural" (page 24), it is not until the Non Technical Summary of the Sustainability Appraisal Report that we find a recognition of a lack of provision for rural areas (on pages 15/16 of that report). Whilst accepting that the main focus of growth and regeneration benefits should be directed towards urban areas, there is a need for a more balanced and robust policy coverage to be given to the rural parts of the sub region. The focus on regeneration in the strategy is supported, but consideration should be given to including a rural regeneration element.

- We support the approach to linking corridors – as advocated on page 4 – and consider that it mirrors the ‘ecological network’ approach by which biodiversity is enhanced. This is a useful parallel.
- The section on links should recognise the commitment in the Wales Spatial Plan to building capacity on the east-west transport corridor across North Wales which passes through North East Wales. The reference to enhancing links from Wrexham to Chester should be accompanied by reference to improving links between Wrexham and Mold to reflect development plan commitments and to recognise the aim in the Wales Spatial Plan to develop the regional role of Wrexham.
- There is discrepancy between reference to “the enhancement of transport links between Wrexham and Chester” (page 4) and “the enhancement of public transport links between Wrexham and Chester” (page 33). The latter wording should be given priority.
- The paragraph relating to Wrexham in the section on the roles of settlements should be strengthened to recognise that it is the largest town in North Wales as well as its growing role as an administrative centre.
- There is a need for a sharper definition of what is meant by reference to ‘Deeside.’ The other locations are more readily identified, but this one needs further spatial refinement and clarity.
- There should be explicit recognition here and elsewhere in the document of the internationally important role of Llangollen as a cultural and tourist centre, based on retaining and enhancing its character and environment.

Introduction

14. There is broad support for the choices set out for the sub-regional spatial strategy (page 9) but it needs to be made clear that at the bottom of the page that both a Strategic Environmental Assessment (SEA) and a Sustainability Appraisal (SA) have been carried out to inform the preparation and development of the new strategy.

The Policy and Strategic Context

15. The references here to the Wales Spatial Plan are welcomed, including the list at pages 10 and 11 of some of its specific propositions for North East Wales (page 42 of the Wales Spatial Plan). However, two key propositions of the Wales Spatial Plan are omitted from the list. These are:-

- ‘Housing pressures should be channelled into public transport accessible locations where it supports regeneration aims’ and
- ‘Areas prone to coastal and river flooding are to be identified and the most suitable responses established, including identifying alternative uses and innovative solutions’

As both of these propositions have clear spatial implications, they should be included on the list.

16. If the aim of the strategy for North East Wales and West Cheshire is to widen the effective catchments for jobs, does this suggest a potential increase in travel to work distances? Unless an appropriate and sympathetic consideration is given to rural employment needs and requirements, it could certainly lead to enhanced commuting from the large rural hinterland to the key urban growth centres (page 10).

17. There is also concern at the current emphasis on city regions such as Liverpool and Manchester and what implications this may have on more peripheral areas, particularly but not exclusively, rural ones. It may need to be carefully handled if it is to avoid marginalising the opinions of towns and rural communities.
18. The concept of Wrexham as a main regional centre and complementary to Chester is an attractive one (page 11).
19. The summary of strategic context on page 13 states that the GVA Grimley study provided the main evidence for the strategy and identifies especially relevant points from that study. However, the points listed do not include what appear to be very important conclusions from the study – i.e. that the weaknesses of the area include the declining population of Ellesmere Port and Neston with the projected decline to 2021 also affecting Chester and Wirral and the significant net out migration from Chester, Ellesmere Port and Neston. The study identifies future threats to the area such as ‘continuation of decline in population in English Districts undermines the housing market, the delivery of key public services and the vitality and viability of urban centres’ as well as ‘continuing trend of net in-migration to Flintshire (in particular), Wrexham (from English Authorities) and Denbighshire leads to loss of local identity.’ This combined issue of population change and movement, their effects and whether or how to alter present trends is not addressed in the draft strategy. If the final strategy is to deal fully with key issues it needs to consider this matter explicitly and clarify whether and how the proposals contained address the weaknesses and threats identified in the GVA Grimley study.

Key Issues – The Economy

20. In terms of key issues, there should be a balance between the ‘economy’ and wider social and environmental concerns. The emphasis upon competition and location for industry and commerce does lend itself more to an economic development document rather than a spatial planning document with a wider remit (pages 16/17). Table 2 (pages 19/20) appears somewhat bland as it could apply to almost any area in the country. Perhaps the sub-region needs to identify its own community strengths and assets and try to develop policies which add to its distinctiveness and encourages economic activity that is characteristic and indigenous to the area?
21. The list of key economic priorities (page 16) could usefully include additional points:-
 - Maintain and enhance town centres as retail, entertainment, service and office locations
 - Upgrade existing employment sites to ensure their full and flexible use

Key Issues – Housing

22. As noted above, the section on page 16 requires reference to the broader issue of population patterns and housing requirements, as well as affordability issues. It is also relevant to recognise the proposition in the Wales Spatial Plan to locating housing in North East Wales along public transport routes and to assist regeneration.
23. The concept of enhancing links between housing and employment sites is an attractive one (page 22) as it is more favourable to sustainability principles by reducing journey to work needs. To be fully effective, the concept would also require the encouragement of appropriate rural employment opportunities in key market towns and larger villages.

Key Issues – The Environment

24. The importance of the natural environment across the sub region is fully supported.
25. A reference to maximising the use of Brownfield land should be added here as well as the requirement to conserve the best and most versatile agricultural land (grades 1, 2 and 3a) as set out in Planning Policy Wales (page 25). This is especially important as Flintshire and Wrexham both contain land of such quality.

Key Issues – Social Inclusion

26. Social inclusion is supported but a stronger emphasis on rural regeneration would strengthen it further.
27. It is unclear why reference to deprivation at Birkenhead is referred to. It should either be omitted or if retained, additional reference to social exclusion problems at resort towns on the North Wales coast should also be included.

Key Issues – The Welsh Language

28. A key social issue not presently identified here is safeguarding the interest of the Welsh Language – this accords with the policies of the National Assembly for Wales set out in Planning Policy Wales and the Technical Advice Note (TAN 20 ‘Welsh Language’). TAN 20 is explicit that land use plans and strategies must take account of the needs and interests of the Welsh language, for example, in considering the scale and distribution of housing. There are communities in North East Wales where Welsh remains an important part of the community and this needs to be recognised in the strategy. Research on the impacts of the Welsh language – commissioned by the National Assembly - has recently been published, and this may be usefully referenced here.

Key Issues – Travel and Movement

29. Better transport integration (especially the use of public transport) is vital when future development sites are considered. One key step would be to re-double the railway track between Chester and Wrexham to increase capacity and service quality.
30. The reference to a relatively good road system is generally correct, however, there are some sub-standard links within the area such as parts of the A541 from Wrexham to Mold which are identified for improvement in local development plans. There should be a general reference here to recognise that some lengths of link roads require upgrading.

The Spatial Vision and Planning Principles

31. As indicated earlier, the spatial vision has not explained the reference to the Liverpool City Region. It should be deleted or an equivalent reference added to the context of North Wales (of which Wrexham and Flintshire are an integral and important part).
32. Again, the list of spatial planning principles should include recognition of the existence and need to conserve the distinctive character of different communities in the area.
33. There is a need to incorporate wider sustainability issues here – not just environmental sustainability.
34. The wider rural hinterland should be incorporated in this section.

35. The reference to quality of life of the residents being paramount suggests emphasis upon community participation. The Sustainable Communities plan could be referred to here.

The Sub Regional Spatial Strategy

36. The aim of supporting sustainable growth in the 4 strategic centres (albeit Deeside needs to be defined) is accepted, but no mention is made to the large rural hinterland. More needs to be done here – perhaps a re-examination of the rural parts of the sub-region. More local, self-sustained growth in rural communities will reduce the need for commuter flows to the strategic centres.
37. The identification of regeneration areas is supported, but does the sub-region contain any areas in need of rural regeneration and support? There is evidence of rural deprivation and inclusion issues even in isolated pockets of the rural Chester district, for example.
38. The description of Deeside on page 27 should also recognise its role in terms of employment for North Wales generally.
39. The map on page 28 should also show the link south from Wrexham formed by the A483 road and the railway route. Both of these link to Cardiff and are identified as part of the core network of Wales in the Wales Spatial Plan.
40. The panel on page 30 recognises the value of Chester green belt as a substantial resource for the region. Equal recognition should be given to the designated green barriers at both Deeside and Wrexham which are important to contain and define the settlements as well as being an environmental resource to support quality investment.
41. The section on Wrexham should refer to its role as a service centre e.g. “to develop Wrexham’s role as a retail and service centre and for higher education and regional health services.”
42. The section focussing on areas of regeneration on page 31 should emphasise the role of housing along public transport corridors to assist regeneration – as stated in Planning Policy Wales.
43. The list of links on page 33 should also include the Wrexham to Mold link in order to reflect development plan policies and the Wales Spatial Plan aim of developing the role of Wrexham.
44. How far is the future based on non-local market forces? Is it realistic to focus too much on a globalised agenda (page 33)? How far should it be looking to build local assets and resources?
45. Strengthening transport links with the rural hinterland is important, but without further support for the rural centres within that hinterland (e.g. Llangollen, Malpas) there is a danger that this will simply encourage further commuting and greater separation between homes and jobs.
46. The panel of existing market roles on page 36 should emphasise Wrexham’s current role of providing higher level services in North Wales as well as the international tourism role of Llangollen (in the County of Wrexham).
47. Whilst agreeing that the housing/employment relationship is becoming increasingly crucial, what evidence is there to support the view that, given current mobility, people will live and work as close as possible to each other? The complexity of this relationship and the reasons behind it need to be better understood (page 38).
48. Page 39 sets out the implications of the spatial strategy for Chester but avoids the sensitive but key issue of the adequacy of the housing supply and whether

- the population decline identified as a threat in the GVA Grimley study will be avoided.
49. The implications of the spatial strategy for Wrexham should refer to a strengthened service as well as retail role, as well as the need to balance tourism and conservation in the Llangollen areas.
 50. The implications of the spatial strategy for Deeside are difficult to assess whilst it is not clear if this extends beyond the employment sites to include adjacent towns. It does include adjacent towns, then references to regeneration and the environment should be included. The need to protect existing green areas of high environmental value should also be recognised.
 51. Reference to the implications of the strategy for the Flintshire coastal towns needs some development to reflect that some of them perform valuable retail and service functions as well as being employment and housing locations.
 52. Page 42 seems to 'dismiss' the large rural hinterland as "likely to be for local needs only." The current rural employment trends in the sub-region could be usefully explored here. Other factors should also be considered such as whether employment and/or residential occupation is growing at faster rates than in the key urban centres and the importance of ICT in rural employment opportunities.

The Supporting Policy Framework

Housing

53. Previous comments in the draft strategy refer to the need to look at the population and housing issues in this area more fully and this section may be the best place to do so. This process may lead to changes in approach and changes to the suggested housing figures for individual authorities.
54. It would be useful to explore, for example, how much of the housing growth in Flintshire is to house those who work in Chester and cannot afford to live there. Is this born out by increased commuting, principally by car?
55. Page 46 refers to an Urban Potential Study for Chester. We support such studies and would recommend that such a study is carried out for Wrexham. Affordable housing is both an urban and a rural issue. The impact of the Chester housing market is undoubtedly a significant factor.
56. The suggested housing figures for Denbighshire appear to be high in relation to the existing population. It is not clear whether this is justified on the basis of natural change or job creation. If not, an excess provision would lead to long distance commuting. Such a development would be contrary to sustainability policies, as well as undermining strategies to retain populations in existing urban areas. It would also raise the issue of whether the impact of such growth on the needs and interests of the Welsh language has been considered and any harm avoided (required by Welsh planning policy guidance).
57. The effect of policy H2 is to suggest that the whole of each of the 4 core authorities are priority areas for affordable housing. It should also make clear that local authorities will identify more specific levels of housing as well as areas of need through their planning and housing activities.
58. On page 49 there is reference to four disadvantaged areas within the County of Wrexham but it is not clear what the implications are or what must be done for these areas.
59. Policy H3 on support for housing in regeneration areas needs to be stronger in relation to Wales – in order to reflect the aims of the Wales Spatial Plan. Also, there should be stronger emphasis upon seeking opportunities to upgrade

existing housing or for new housing along public transport routes to support regeneration.

Employment Land

60. The commitment to review existing employment sites in policy ECON1 is welcomed but should be extended. This should not only include the review of allocated but undeveloped land but also the review of active sites to see if they can be redeveloped or upgraded to maximise their potential and flexibility. This may reduce pressure on new Greenfield development. Alternative uses (including mixed use) may be appropriate in some cases.
61. Policy ECON2 focuses on strategic sites and lists some suggested sites; however, it should recognise that detailed locations should emerge through the development plan process. This section could help local authorities to select suitable sites by setting out a framework of spatial planning criteria. Suitable criteria such as access to road and public transport, proximity to labour (especially from areas in need of regeneration), preference for Brownfield and allocated land, avoidance of areas subject to flood risk and avoidance of green belt or green barrier land (unless justified as part of a review) would provide useful assistance and would accord with planning policy and the Wales Spatial Plan.
62. This section refers to a new premier business park being required in the Chester area. It is not considered appropriate to reopen the Greenfield development case for Chester again, and the SEA/SA reinforces this point. Detailed locations should emerge through the development plan process.
63. The concept of some mixed use strategic development areas, to include housing, is a positive one but again it should make clear that local planning authorities should consider the potential for such areas through their local development plans. It should be stated here that such areas should be related to existing communities with a range of available facilities in order to ensure their sustainability and to accord with planning policies. Similar criteria to those suggested above in relation to policy ECON2 (paragraph 39) would assist local authorities in the consideration of such opportunities. Such schemes could contain local shopping (reference is made to retail and leisure) but would clearly not be in accord with planning policy if they sought to establish new out of town shopping areas.
64. What is the justification/reasoning for these strategic mixed use sites to be a minimum of 25 acres?

Connecting Places and People

65. The link from Wrexham to Mold should be identified for strengthening in order to assist the development of the regional role of Wrexham.
66. The aim of supporting a sub regional transport strategy is welcomed. It should be made clear that this will also need to interact within the larger integrated transport system being developed for North Wales by a consortium of local authorities.

Encouraging ICT Infrastructure Development

67. The recognition that ICT infrastructure can contribute greatly to the rural economy is welcomed, however, there needs to be a more distinctive and integrated section in the strategy document which covers the rural hinterland.

Encouraging Local Distinctiveness

68. This section is welcomed but should be strengthened to include reference to the importance in parts of North East Wales to the Welsh culture and language. The reference to local development frameworks which only apply in England should be accompanied by a reference to local development plans (the equivalent in Wales).

Protection of the Environment

69. This policy (ENV2) needs to contain a section on Landscape Character (which has been approached quite differently on both sides of the border). Could more collaboration and stronger links be advocated here?

70. Reference to local development frameworks should be accompanied by reference to local development plans in Wales.

Brownfield Land

71. Brownfield sites of all sizes and not just those in excess of 10 hectares are valuable, but in any sequential approach they are not necessarily the most sustainable options for development in all cases (page 59). Some Brownfield sites hold significant value for biodiversity.

Existing Greenbelt Designation

72. There are concerns about reopening the Chester Greenbelt issue when other possible options are yet to be explored (page 60).

The Rural Hinterland

73. The policy is welcomed, but by distinguishing between the rural hinterland and urban centres it should be recognised that it is more than simply farm diversification and tourism. Policy R2 could lead to further rural problems if people use the rural hinterland as a dormitory and seek employment and service provision in the four key urban centres.

74. Again a reference to protecting the best and versatile farmland in Wales should be included.

Strategic Mixed Use Developments

Retail

75. Policy RET2 should be amended to refer only to the provision of local shopping at strategic mixed use developments. Otherwise this policy would not accord with clear national policy recently re-emphasised in Wales by a Ministerial Interim Planning Policy Statement (clarification of retail policy, 2005) in favour of town centre and against out-of-town retail and leisure development – even where it is argued that it assists economic regeneration.

Leisure and Tourism

76. Appropriate references to the major tourism attractions in Wrexham based on the attractive scenery and cultural attractions in Llangollen and Erddig Hall should be included here. Wrexham is also increasingly recognised as an attractive town.

**Sustainability Appraisal
Non-Technical Summary of the Sustainability Appraisal Report**

1. We recognise the limited opportunity for the SA to have influenced the choice of growth scenarios in this document.
2. SOC 8 mentions the protection and enhancement of the Welsh language and cultural resources, but this should also be contained in the document itself.
3. There is a clear statement that the main areas of conflict are between promoting a buoyant and diverse local economy and conserving biodiversity. This identifies a key area on which to concentrate and to try and accommodate the two.
4. Tables 3 and 4 provide a useful summary of environmental and sustainability issues which would be helpful in the report itself. They also add local colour and distinctiveness.
5. It is useful to see the process leading up to the selected growth scenario and spatial option B.
6. There is a clear recognition that “A reassessment of greenbelt and development in these areas should be avoided (page 24).”
7. There are some useful comments on rural policies which do not appear in the main report.
8. The conclusions and recommendations help to understand the underlying thinking of the sub-regional spatial strategy, namely:-
 - No radical change from the existing position
 - Limitations over the inclusion of rural areas
 - The strategies are focused on urban centres to deflect development from more environmentally sensitive rural areas
 - Adverse environmental impacts are anticipated given the level of growth envisaged
 - Brownfield sites are preferred to Greenfield sites
 - There is an expected cumulative impact of the policies set out in the sub-region spatial strategy

Many of these points would be welcome in the main report itself.