

# **DRAFT REGIONAL SPATIAL STRATEGY FOR THE NORTH WEST**

Statement on behalf of Persimmon Homes

Matter 1A Vision and Objectives

Matter 1B Spatial Principles

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**1A(i) Are the overall vision and objectives in draft RSS appropriate and do they adequately cover the characteristics and issues of the whole Region?**

1. As the largest volume housebuilder in the UK and one who is very active within the region, Persimmon Homes support the general commitment to the ongoing renaissance of the major urban areas, towns and local communities. The acknowledgement within the broad vision of the need to embrace economic change and forward growth is particularly welcome given the intrinsic and acknowledged link between economic expansion and housing demand. The focus on economic growth sectors and the accompanying acknowledgement that the improvements in the regions infrastructure, in particular integrated transport solutions, must keep pace so as to not compromise growth, is particularly welcome.
2. Persimmon consider that the draft Strategy would benefit from a specific and direct reference to the overriding link between the need to ensure sufficient homes are brought forward to support both the economic aspirations set out in particular within RES and the wider sustainable objectives. This is particularly relevant given that the draft strategy specifically acknowledges the need to increase housing numbers in order to support economic growth.
3. Whilst this overall approach is generally supported, Persimmon do have concerns as to the detail of how these objectives are to be translated at a sub regional level via the more detailed residential policies within the strategy. This is particularly so given that the Strategy is to endure for the next 15 – 20 years and will, when adopted, inform emerging individual LDF's. As might be expected given Persimmons essentially market perspective, it is a concern with detailed interpretation of these wider policy objectives which form the bulk of the Persimmon responses, both here and elsewhere.
4. A key exception to this general support to the principal of the approach is in respect of the Central Lancashire City Region. Representations submitted by RPS on behalf of Persimmon Lancashire, the local group subsidiary, in respect of matter 9A raise concerns as to the lack of any logical cohesion to the proposed City region. The basis for this concern as set out in the RPS representations is that:
  - The travel to work areas are small and discrete between the individual centres

- The population of the City region is significantly smaller than that of Manchester and Liverpool.
  - The lack of effective functional, social or cultural links between the main towns, with the exception of between Preston, Chorley and South Ribble.
5. The overall conclusion is that within the City region only Preston and its immediate hinterland can claim to be a realistic focus for development

**1B i) Does the draft RSS set out the right underlying principles for spatial planning in the region?**

6. Persimmon would raise no particular concerns in respect of the underlying principles as identified with DP1. There is an issue however in the fact that the policy seeks to adopt a uniform approach the Region as a whole, thus ignoring the geographical distinctiveness which is identified elsewhere within the draft Strategy as being a virtue of the region. The strategy is in danger of over emphasising the importance of Manchester and Liverpool at the expense of other parts of the Region. This lack of any geographical dimension within the development principles, or at least the acknowledgement of any potential physical distinctiveness, undermines the robustness of the policy. Persimmon consider the region to be internally distinctive in market terms and this should be reflected within policy DP1.

**1B iii) Is the sequential approach in DP1 appropriate**

7. Persimmon Homes would seek to take particular issue in respect of the sequential approach as set out within policy DP1. As currently stated the policy seeks to prioritise the effective use of existing buildings and infrastructure within settlements, including re-use/conversion, ahead of and making a distinction with development of previously developed land.
8. Our concern with this is that it does not reflect the spirit or detail of government policy as set out within either PPG3 or in particular the replacement draft PPS3. Neither of these national policy statements provide any support for the designation of previously developed land within settlements as a lesser option behind re-use/conversion of existing buildings. No such distinction is made and there is no suggestion within

national guidance that there is scope for either element to be considered separately. In seeking to identify such a distinction it is our view that ver prescriptive and potentially begins to present a constraint on the beneficial development of previously developed land. Such a constraint would have no basis nor support within government policy. There are clear instances where redevelopment of existing buildings may be the only effective approach where re-use is neither appropriate nor economic; the retention or otherwise buildings in such instances is adequately controlled by other elements of planning law and practice. To seek to impose a restriction within what is, by definition, a regional and strategic state of development principles is appropriate and which would be potentially restricted to the wider detriment.

10. Persimmon would wish to see the policy changed. The policy seeks to apply a level of restriction and constraint which is not only unsupported by national policy, but actively flies in the face of emerging policy in the form of PPS3 which actively moves away from sequential approach towards one which emphasises deliverability (i.e. land which is suitable, viable and available reflecting the approach adopted within PPS6). The Strategy policy should be amended so as to seek to reflect this less prescriptive approach.
11. It is also consider that the overriding requirement for residential development to be genuinely accessible by public transport, walking and cycling is over restrictive. There are a number of rural development locations where it is simply not possible to meet these criteria but which is themselves would meet a locally generated need for housing provision. The policy wording should be amended to incorporate this diversity.