

MATTER 4

**SUBMISSION TO THE
DRAFT REGIONAL SPATIAL STRATEGY FOR THE NORTH WEST
EXAMINATION IN PUBLIC**

BY

EMERY PLANNING PARTNERSHIP

LEAD CONSULTANT: STEPHEN HARRIS BSc (HONS) MRTPI

**EMERY PLANNING PARTNERSHIP
4 SOUTH PARK COURT
HOBSON STREET
MACCLESFIELD
CHESHIRE SK11 8BS**

TEL: 01625 433881

FAX: 01625 511457

Email: macclesfield@epp-planning.com

OUR REF: REPS3-6594-SH Matter 4

OCTOBER 2006

1. INTRODUCTION

- 1.1 These representations to the draft Regional Spatial Strategy for the North West are submitted by Emery Planning Partnership. We have made representations on behalf of various clients however these representations are made solely as a planning consultancy based in the North West
- 1.2 On Matter 4A(i), we consider that the new DCLG household projections which were published in March 2006 are a significant material consideration that should be taken into account by the Panel. These figures are based on updated projections of household formation taking account of the 2001 Census and on the Office for National Statistics' sub national population projections and the Government Actuary's Department's national population projections (2003 based). The figures clarify that most of the additional growth compared with the previous projections is in the North West, Yorkshire and Humberside and in the West and East Midlands.
- 1.3 In the North West the percentage growth in households is 18% above the previous estimates. Therefore the overall annual average requirement in Policy L4 will need to be revised upwards to take account of these recently published figures.
- 1.4 Table 1 below sets out the annual average requirement proposed in the draft RSS for certain authorities in the region and compares these figures with the 2003 household projections for the same plan period. The percentage change is included in the fourth column.

Table 1

	Draft RSS requirement 2003-2021	2003 household projections increase 2003- 2021	Percentage Change
Manchester	63,000	38,000	-40%
Salford	28,800	8,000	-73%
Warrington	6,840	13,000	+90%
Vale Royal	9,000	13,000	+44%
Congleton	5,400	6,000	+11%
Stockport	8,100	10,000	+23%

- 1.5 As can be seen from the table there are significant differences between 2003 household projections for each of the authorities to the requirement set out in the draft RSS.

- 1.6 We consider that there should be corresponding changes in the housing requirement for each of the authorities within the plan period in line with the 2003 projections.
- 1.7 In answer to part ii, we consider that the imposition of maximum targets results in one of the Governments key objectives which is the re-use of previously developed land being compromised in many areas of the region. For example, many of the authorities in North Cheshire and Greater Manchester have introduced policies of housing restraint where the redevelopment of previously developed sites are no longer permitted. They have applied the annual requirements strictly with no scope for further development above those ceilings, even though many of the commitments that are part of that supply may be historic completions or sites with ownerships constraints etc.
- 1.8 Indeed authorities such as Vale Royal, Macclesfield, Warrington and Stockport refuse the redevelopment of previously developed sites even though there may be local support for the development as they may be an eyesore or a magnet for unsocial behaviour. It is recognised that some policies of restraint have certain exceptions, which may include regeneration sites, however the exceptions are particularly restrictive and leaves many previously developed sites vacant.
- 1.9 In addition, many of the policies of housing restraint provide for exceptions for 100% affordable housing. However due to their characteristics, previously developed sites usually have an existing land value (e.g. employment land) and may have contamination which result in higher redevelopment costs. Therefore due to economics, these previously developed sites which are not permitted under the policies of restraint for open market housing are unlikely to be redeveloped for affordable housing either. Therefore they remain undeveloped to the detriment of the locality.
- 1.10 Therefore we consider that the annual average housing requirement should be worded so that there is provision for the annual requirement to be exceeded where it can be demonstrated that the development is necessary in order to secure the redevelopment of previously developed land which have environmental, economic and social benefits for that authority.