

DRAFT REGIONAL SPATIAL STRATEGY FOR THE NORTH WEST

Statement on behalf of Persimmon Homes

Matter 7A Sub-Regional Strategy

Matter 7B Housing Issues

GVA Grimley LLP

81 Fountain Street
Manchester
M2 2EE

0870 900 8990
www.gvagrimsley.co.uk

7A i) Does the Strategy communicate a clear, sustainable and appropriate vision for the sub region?

1. PPS11 makes it clear that RSS should provide a broad development strategy to which new local development documents must generally conform. It is essential therefore that important strategic sub-regional locations for future housing development are clearly set out in order to make the RSS proposals deliverable at development plan level. Without this clarity, such locations could be considered to be reduced in importance or priority, and thereby not be given the appropriate recognition and support at the local policy level.
2. Whilst it is recognised that sustainable growth and regeneration should be targeted within the main Manchester/Salford and Liverpool city regions, minimal recognition is afforded to the importance of developing other urban networks, resultant in a subsequent over-allowance of housing in the core of the aforementioned city regions/conurbation's. In addressing this concern Persimmon consider that RSS should seek to afford greater focus to the development of a wider regional network to increase competitiveness and create mixed communities across the wider region, as opposed to promoting a strategy whereby the core urban areas are largely market dominant.
3. Policy MCR3 '*Southern part of the Manchester City Region*' does not provide for a coherent and balanced approach to sustainable growth resultant from the policy of housing restraint in the south. Given south Manchester comprises significant travel to work areas, a housing shortage would generate affordability issues for a wide mix of local people, including first time buyers, key workers and lower income households. In addition, economic investment is generally dependent upon the availability of a diverse, stable and attractive housing stock which under the current RSS approach will be limited. The NorthWest Household Growth Study prepared by Nathaniel Lichfield and Partners (2005) identifies Manchester's strong economic performance as being '*driven predominantly by the southern part of Greater Manchester which has experienced both high economic growth and employment.*' This is further reinforced through the North West Regional Housing Strategy (2005) which identifies south Manchester as the '*fastest growing part of the region, creating significant supply and affordability problems.*'

4. South Manchester encompasses significant transport infrastructure including the regional motorway network and public transport provision (Metrolink). PPS1 and PPG13 both set out to reduce the level of travel dependency. Planning should take an active role in managing patterns of urban growth to make full use of public transport services and focus development around major public transport interchanges. South Manchester, given its transport linkages and location, offers a significant opportunity for new housing and the creation of sustainable communities. RSS should support housing growth in south Manchester reflective of this and to support continued infrastructure and economic development within the city region.

Matter 7B i): Is the sub-regions housing provision and distribution appropriate and achievable. Are the PDL targets in Table 9.1 realistic, deliverable and based on robust evidence?

5. National planning policy in the form of PPS1 and draft PPS3 promotes the development of previously developed land in suitable locations, ' *whether through new development or the conversion of existing buildings.*' Although reference is made to the reuse of existing buildings, this is not identified as a priority over brownfield development. One of the government's key aims is to ensure that everyone has the opportunity of a decent home in sustainable locations that reduce the need to travel, be it through new-build or refurbishment/conversion. Pursuant to this, the sequential approach proposed in RSS regarding the reuse of existing buildings should be amended accordingly so to better reflect this national approach.
6. Persimmon consider that RSS should seek to adopt a balanced approach to the delivery of new housing in the region. The brownfield targets put forward in conjunction with the housing provision figures as set out in Table 9.1 are exceedingly high and we do not consider these to be realistic at an average of circa 85%. The RSS approach should recognise that only a finite resource of brownfield land is available in the region and that this will inevitably decline over the course of the Strategy period. Whilst the utilisation of brownfield land is acknowledged by the housebuilding industry as being a proper component of supply, it should also be noted that the development of new housing around existing services, including schools and health facilities, will be fundamental to the government's objective of creating sustainable communities. Since the advent of PPG3 '*Housing*' in March 2000, the housebuilding industry in general has adopted a concerted approach to the supply of housing on brownfield sites, in some locations resultant in an oversupply of

flats and high-density development. However the development of smaller brownfield sites can undermine the creation of sustainable mixed communities given that existing education and health provision cannot support such high-density urban development. A more strategic and less prescriptive approach is required in RSS to reduce the reliance and emphasis on brownfield sites within some sub-region areas where availability is limited and to identify alternative greenfield sites in sustainable locations, albeit it is acknowledged that incursion into the green belt should be a low priority.

7. With regard to the distribution of the sub-region's housing provision it is considered that it in part fails to reflect the economic status of key towns. As an example the housing allocation afforded to Warrington is not commensurate with the economic status of the settlement. Given its physical location between the major conurbation's of Liverpool and Manchester, Warrington incorporates significant social and transport infrastructure capable of supporting the development of mixed sustainable communities. The North West Regional Economic Strategy (RES) identifies Warrington as a growth opportunity, and new housing is key to supporting such development. It is considered however that the RSS housing allocation of 6,840 (Table 9.1) fails to reflect either the high employment activity rate in Warrington, nor the future economic role planned for the town generated through major development proposals such as Omega, a strategic employment site identified in both the RES and RSS. The housing allocation should be amended accordingly to support the potential for economic growth within the area, and ensure that sufficient land of a suitable quality is available for housing development to meet expected future needs pursuant to PPS1.
8. Within Northern Manchester, the housing provision figure for Bolton (9,200, Table 9.1) is notably lower than other comparable settlements such as Bury and Wigan. Bolton MBC has to date failed to assess its urban capacity, housing need or housing market to robustly inform its housing requirements for the future. Thus on this basis and given the location of the Borough within the Manchester city region, the current RSS housing figure is considered too low when compared to the aforementioned settlements, and should be significantly increased to a figure more comparable to that allocated for Wigan (16,200). This will provide for a diverse choice of residential opportunities, and affordable housing to attract people to the region and continue to support sustainable economic growth.

Conclusions

9. Alongside the core city regions, RSS should focus on the development of urban networks in the sub-region to promote the creation of mixed communities across the region and increased competitiveness.
10. RSS should recognise the contribution of south Manchester to the continued economic development of the Manchester City region. Sufficient provision should be made for future residential development in this area to support its economic growth.
11. Failure to plan for economic and household growth in key sub-region areas will result in an under-provision of housing contributing to price-increases, in particular in those areas of highest demand.
12. A lack of sufficient housing availability in key service areas could contribute to higher house prices, potentially prejudicing the in-migration of skilled workers needed to deliver the jobs growth.
13. RSS should adopt a balanced approach to the delivery of new housing reflective of only a finite resource of brownfield land being available in the region. New housing should be focused around or close to key public services to achieve sustainable mixed communities.