



PARTIAL REVIEW OF REGIONAL  
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Project Plan  
February – March 2008

## **North West Regional Assembly**

### **PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) – Consultation on the Draft Project Plan**

A consultation report from

#### **CAG Consultants**

in association with **Concept 4 Creative and Community Consultants**

April 2008

CAG CONSULTANTS  
Gordon House  
6 Lissenden Gardens  
London NW5 1LX  
Tel/fax 020 7482 8882  
hq@cagconsult.co.uk  
www.cagconsultants.co.uk

for direct enquiries about this report please contact:

Emma Cranidge  
Ewood House, Ewood Lane, Todmorden, OL14 7DF  
tel 01706 817347 or mob 07879 017617  
[ec@cagconsult.co.uk](mailto:ec@cagconsult.co.uk)

# Contents

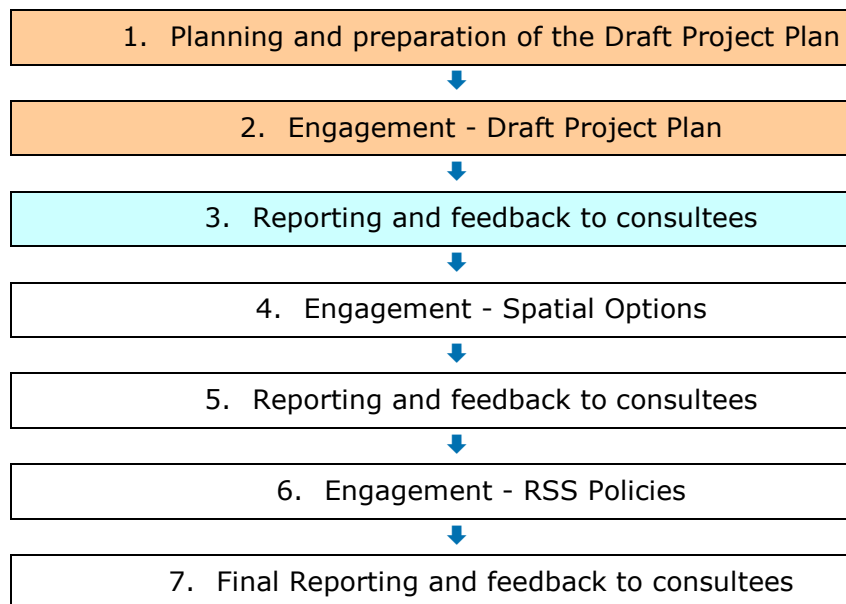
Contents	3
Introduction	4
The Engagement Programme	5
Summary of the Key Issues	7
The Participants' Input	14
Participants comments and the consultation	91
Appendix One - The Framework	99
Appendix Two - Draft Project Plan Engagement Questionnaire	100
Appendix Three - Rules of Engagement	105

# Introduction

This report has been produced by CAG Consultants for the North West Regional Assembly (NWRA) as part of the 2008/09 Partial Review of the North West Plan. In it we;

- Summarise the engagement process;
- List and review the comments received; and
- Make suggestions for changes to the consultation process.

This report represents the first of a three stage engagement process that together forms the full engagement process (Appendix One) of the Partial Review of the North West Plan. There are three engagement stages within this review as shown in the table below. In the table completed stages are shown in salmon and the current stage is shown in blue.



This reports accompanies an internal report describing the progress of the engagement process, against the agreed framework.

# The Engagement Programme

## The engagement process

In this section we summarise the processes of engagement being used within the Partial Review of the North West Plan. Within the programme, people and organisations have been given several opportunities to find out about and become involved in the Partial Review, including:

- **Finding out about the programme**

- 3000 plus letters sent to consultees on the existing NWRA consultation data base;
- Leaflets sent to all local libraries throughout the North West;
- Press Releases sent to all local papers in the North West (via Tangerine PR);
- Press Releases sent to a range of professional and trade journals (via Tangerine PR);
- Information sent to local authority communications officers; and
- Information sent to local Councils for Voluntary Service.

- **Inputting comments into the process - methods provided through CAG Consultants**

- Completing an online questionnaire
- Completing a postal questionnaire
- Completing a questionnaire by voice using the free phone line
- Inputting comments via the free phone line

- **Inputting comments into the process – other methods used by participants**

- Writing to NWRA
- Emailing a dedicated consultation email address
- Emailing NWRA

## The engagement tools

To assist the smooth running and appropriate analysis of the engagement programme two engagement tools have been made available to participants. These are;

- The Draft Project Plan Questionnaire
- The Rules of engagement

### The Draft Project Plan Questionnaire

The Draft Project Plan Questionnaire takes the themes and sections of the Draft Project Plan and poses a series of questions to which participants may choose to respond. It also includes space for any other comments and contact details so participants can be kept informed of the process. The questionnaire is available in full in Appendix Two.

### The Rules of Engagement

This list of rules outlines expectations on both sides of the process and are listed in Appendix Three.

# Summary of the Key Issues

In each case we have reviewed all the comments received and drawn out the key issues raised. These key issues are listed in this section, with the full comments received listed in the following section. We recommend that the full results are viewed in addition to this summary, as this summary is intended to be an introduction to the comments and is reflective of them rather than comprehensive.

As this is a consultation on a draft project plan rather than a consultation on options or policies we have not at this stage gone into any deeper analysis of the comments.

The consultation questionnaire had three parts:

1. Initial comments about the issues and subject areas;
2. Inputting information on other research;
3. Comments on the draft engagement plan.

Participants were invited to offer only initial comments about the subject areas for the partial review at this stage. As this is the case and all will be revisited in more detail in options and policies stages, in depth analysis is not required here.

The research suggestions are listed for information with contact details where these were supplied. However, the comments about how the engagement process will be conducted have been responded to in more detail the final section.

## Question One – The Issues, in principle.

When asked **do you agree that these (listed in the questionnaire) are key issues for the region and this review**, 17 agreed and 10 disagreed with the key issues raised being;

1. Green infrastructure (GI) and climate change should be key, cross cutting issues for the region;
2. There is a level of uncertainty about future development plans, due to local government reorganisation in Cheshire;
3. These [the Partial Review] issues appear as 'burning issues' affecting the quality of life of the citizens of the town in the local press;
4. Meeting unmet housing need is important, including issues of affordability and the needs of gypsies and travellers;
5. Real consultation is important, together with real debate about the impact of housing figures; and
6. Health is an omission.

## Question Two – The Issues, in particular

We asked a series of questions relating to each of the issues that are subject of the partial review. In each case the following key issues were inputted as **initial comments**;

### 2a Sub-regional Housing Market Areas

1. Local Planning Authorities need to be involved;
2. Other reports suggest that opportunities housing developing in Chester (and other characterful areas) are be limited, but with Warrington may be able to address issues of affordability;
3. Cross regional economic and housing issues need to be considered;
4. The impact of new build on existing infrastructure, historic town centres and parking needs to be assessed fully in an inter-dependent way
5. There needs to be a clear and well publicised statement of:
  - the concept of an HMA;
  - how the designation of HMAs will impact upon policy;
  - the statistical basis of any HMA, including background assumptions; and
  - the sensitivity of HMA designations to the assumptions.
6. The current Growth Point bidding round will impact on this area of work;
7. Public Support for HMA plans needs to be tested;
8. It will be important to retain differential policies within HMAs to encourage urban concentrations & regeneration;
9. Other issues:
  - HNA focus can detract from physical and economic renewal
  - Maintaining an improvement in standards is important
  - Affordability
  - Difficulties of getting insurance when living on a flood plain
  - Flooding
  - Building on green belt, when brown field sites have run out

### 2b Revision of District Housing Figures

1. Local Planning Authorities need to be involved;
2. Other reports suggest that opportunities housing developing in Chester (and other characterful areas) are be limited, but with Warrington may be able to address issues of affordability;
3. Cross regional economic and housing issues need to be considered; and
4. The impact of new build on existing infrastructure, historic town centres and parking



needs to be assessed fully in an inter-dependent way

5. There needs to be a clear and well publicised statement of:
  - the concept of an HMA;
  - how the designation of HMAs will impact upon policy;
  - the statistical basis of any HMA, including background assumptions; and
  - the sensitivity of HMA designations to the assumptions.
6. The current Growth Point bidding round will impact on this area of work;
7. Public Support for HMA plans needs to be tested;
8. It will be important to retain differential policies within HMAs to encourage urban concentrations & regeneration;
9. Other issues:
  - HNA focus can detract from physical and economic renewal;
  - Maintaining an improvement in standards is important;
  - Affordability;
  - Difficulties of getting insurance when living on a flood plain;
  - Flooding;
  - Building on green belt, when brown field sites have run out.

## 2c Growth Points and Eco-towns

1. In order for the PR to incorporate areas as growth points and create eco towns, the review will need to rely on other segments of the RSS, such as housing figures. It is reliant on those being reviewed first;
2. Eco-towns should be exemplar developments applying the highest environmental standards and combining the provision of well designed, appropriately timed and sufficiently funded green infrastructure with the protection and enhancement of existing biodiversity and protected sites;
3. Growth points should be managed with regard to sustainability issues;
4. The economic benefits need to be demonstrated;
5. Communities need to be involved in the process ;
6. The plans for growth point need rigorous testing against a set of clear criteria ;
7. Growth points are an opportunity not to be missed.

## 2d **Renewable Energy**

- 1.Site for renewable energy need to be located where they will not increase CO<sub>2</sub> outputs and where they will not cause harm to wildlife;
- 2.Any work needs to consider research that has already taken place, for example, research on water power in the Mersey Basin;
- 3.Any work needs also to acknowledge recent government announcements re nuclear power;
- 4.The North West contains considerable opportunities for the development of a full range of renewable energy sources;
- 5.Bottom up approaches are needed to develop this work area.

## 2e **Waste**

- 1.It is important that the provision of a waste facility does not drive down work towards improving waste minimisation;
- 2.Any plans need to be based on robust evidence;
- 3.Householders, industry and the private sector may still need more education in this area, possibly linked to incentives; and
- 4.Any North West policies need also to consider nuclear waste.

## 2f **Gypsies & Travellers**

- 1.Clarity is needed in terms of local authority responsibilities;
- 2.The issue for planning is to ensure that realistic and achievable opportunities exist for Gypsies and Travellers who wish to make provision for themselves and are facilitated by the planning process;
- 3.Negative attitudes towards Gypsies and travellers still exist; and
- 4.Minorities in general require greater support than has been given or have taken up to date.

## 2g **Travelling Showpeople**

- 1.There is a need for open spaces for community activity, areas that could accommodate permitted activities such as community festivals, open air concerts etc. These areas would ideally have maintained facilities (power supplies, car parking and toilet facilities);
- 2.Plans are vital to the development of core strategies.

## 3. 2h **Update of Regional Parking Standards**



4. Local Authorities and station operators should consider making additional provision for car parking at railway stations, so as to promote maximum use of the rail network;
5. It is hoped that new updated standards will help local planners reach constructive, innovative and environmentally sympathetic solutions;
6. Cumbria does not have the public transport infrastructure of the city regions. Therefore it requires a less restrictive car parking standard;
7. The needs of disabled drivers need consideration; and
8. Parking needs to be considered within wider transport issues.

## 2j Key Service Centres

1. These should be based on functionality rather than solely on physical size and population size; and
2. They should be accessible and inclusive.

## Question Three – The Consultation, the methods

When asked if they were **happy that the engagement methods will offer the opportunity to get involved in the process**, 17 said they were, while 11 said not.

For those that were not happy with the methods outlined the following key points were raised;

1. There can be a delay for receiving paper copies of questionnaires;
2. The fact that two Local Authorities cannot participate fully should be addressed;
3. Workshop venues should be next to railway stations;
4. Consultations can become taking shops if too many organisations become involved;
5. When substantive policy is being addressed the 500 word limit per box should be scrapped along with the 'one sitting' requirement on the electronic questionnaire; and
6. This means that the design of questionnaires must involve local Gypsies and Travellers and their representative groups.

## Question Four – The Consultation, the timeline

Participants were asked if they had any **comments to make about the time line**. Many (??) did and the comments included;

1. The Review will take place before the original draft RSS even be adopted, this will be a problem and may cause confusion;

- 2.To achieve consensus views especially within democratically elected organisations, a 3 month period is needed;
- 3.Parallel working will be needed for the development of LDP; and
- 4.July and August are difficult months to undertake consultations in.

### Question Five – Technical Information

Participant were invited to tells us about **other research** that was going on that might needed to be included in developing the options and / or policies.

Several (??) participants identified research and this is listed in the next section.

### Question Six – Other Comments on the Draft Project Plan

When asked if they had any **other comments** that they wanted to make about the **Draft Project Plan**, participants inputted the following;

- 1.Working across regional boundaries is important
- 2.This review and the strategy could be used to identify areas of deprivation and plans for reliving it
- 3.The partial review could also consider:
  - Reintroducing the 'Shankling Plan' in Bolton;
  - Transport investment priorities;
  - Regional Flood Risk Appraisal;
  - Vast numbers of empty housing .

### Question Seven – Other Comments on the Partial Review of the North West Plan

When asked if there were any **other comments** that they wanted to about the **Partial Review of the North West Plan**

1. The Review will take place before the original draft RSS even be adopted, this will be a problem and may cause confusion;
2. To achieve consensus views especially within democratically elected organisations, a 3 month period is needed;
3. Parallel working will be needed for the development of LDP; and
4. July and August are difficult months to undertake consultations in.



# The Participants' Input

We received 35 inputs in total, which in comparison to other consultations on Draft Project Plans, seems to be an average response rate. Of this, 2 were via the free phone line and 7 were received via letter, email or postal questionnaire, the remainder were received by the project web site through using the online questionnaire.

For those who did not respond via the electronic or postal questionnaire, CAG Consultants entered their comments verbatim in to appropriate parts of the questionnaire so that their comments could be included in the consultation data base.

In this section we summarise the key points from each question and list the verbatim comments received from participants, as follows;

## The Questions

The questions that participants were invited to answer were;

### Question One – The Issues, in principle.

1. Do you agree that these (listed in the questionnaire) are key issues for the region and this review?
  - 1a If so why?
  - 1b If not, why not?

### Question Two – The Issues, in particular.

- 2 At this stage do you want to make any initial comments about any of the issues?
  - 2a Sub-regional Housing Market Areas;
  - 2b Revision of District Housing Figures;
  - 2c Growth Points and Eco-towns;
  - 2d Renewable Energy;
  - 2e Waste;
  - 2f Gypsies & Travellers;
  - 2g Travelling Showpeople;
  - 2h Update of Regional Parking Standards;
  - 2j Key Service Centres.

### **Question Three – The Consultation, the methods**

3. Are you happy that these methods will offer you an opportunity to get involved in the process?
  - 3a. If no, why not and what alternative methods would be more suitable for you and why?

### **Question Four – The Consultation, the timeline**

4. Do you have any comments to make about the time line?

### **Question Five – Technical Information**

5. If you know of other research please tell us about it here and include any contact details you may have for the organisation undertaking the work.

### **Question Six – Other Comments on the Draft Project Plan**

6. Are there any other comments that you want to make about the Draft Project Plan?

### **Question Seven – Other Comments on the Partial Review of the North West Plan**

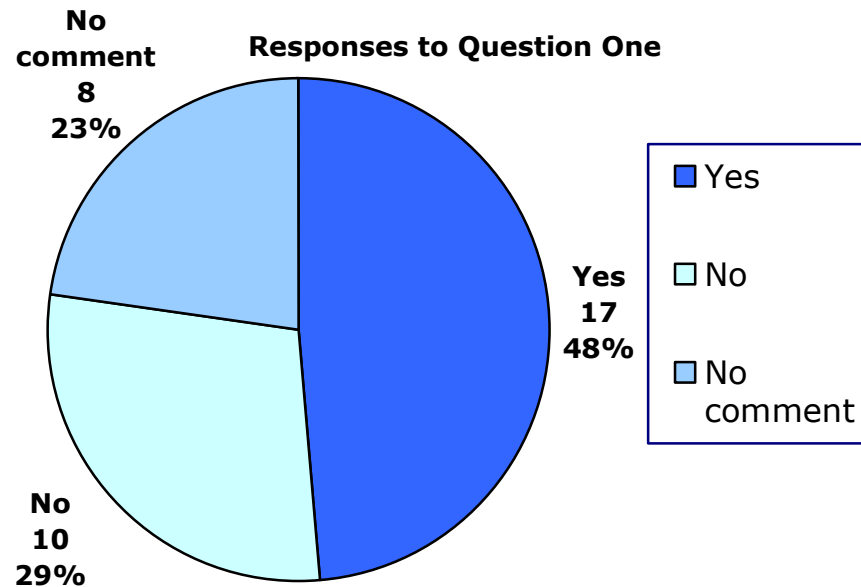
7. Are there any other comments that you would wish to make about the Partial Review of the North West Plan

The questionnaire also include, **question 8** which asked respondents if they wanted to remain anonymous. Below we have only named respondent who did not tick the 'remain anonymous' box.

## Question One – Do you agree that these are the key issues for the region and this review?

### Summary Responses

There were 27 responses to question one and 8 participants made no comment, as follows;



A review of the participant responses shows that participants who responded raised the following key issues

1. Green infrastructure (GI) and climate change should be key, cross cutting issues for the region;
2. There is a level of uncertainty about future development plans, due to local government reorganisation in Cheshire;
3. These issues appear as 'burning issues' affecting the quality of life of the citizens of the town in the local press;
4. Meeting unmet housing need is important, including issues of affordability and the needs of gypsies and travellers;
5. Real consultation is important, together with real debate about the impact of housing figures; and



6. Health is an omission.

The table below shows the verbatim comments received.

Organisation:	1. Do you agree that these are key issues for the region and this review?	1a. If so why?	1b. If not, why not?
The National Trust	No	<p>It is unclear why the initial work that was undertaken on Environmental Capacity in 2007 has not been taken forward into this Partial Review of RSS. The NWRA has previously advised that the 'findings and recommendations (will be taken into account) for future Regional Spatial Strategy development'. The ENTEC Report (July 2007) noted that the RSS Panel Report (2007) "...has reinforced the urgency of more precisely specifying how the RSS should set a strong environmental policy framework" and considers that environmental capacity thinking could be a helpful route into this task. The recommendations (especially 1) are clear that some particular components of environmental capacity – water supply and disposal and climate change mitigation and adaptation – raise urgent issues that need to be addressed in the light of the significant development activity proposed in RSS. The statement on page 17 of the draft Project Plan is considered to be inadequate as the items of work need to be a) agreed as part of the plan, b) coordinated in terms of the preparation of the evidence bases, and c) the subject of consultation. It is unclear how the three key issues around Housing and related development that the RSS Partial Review does propose to consider can be adequately assessed without an understanding of environmental capacity issues across the Region.</p>	
Manchester City Council	No	<i>No comment recorded in response to this question</i>	
Mersey Forest	No	<p>Whilst we do not disagree that these are key issues for the region, we think that green infrastructure (GI) and climate change should be key issues for the region. Ideally these would be treated as key issues and then, because of their cross cutting nature, also be 'woven' into other issues. GI is</p>	

Organisation:	1. Do you agree that these are key issues for the region and this review?	1a. If so why?	1b. If not, why not?
		<p>defined in the NW GI Guide as the "regions life support system - the network of natural environment components and green and blue spaces that lies within and between the NW's cities, towns and villages and provides multiple social, economic and environmental benefits". The NW GI Guide accompanies policy EM3 in the draft RSS. The GI is crucial for the region as we need to know what assets we have, how they function, and the benefits they provide in order to protect, create and enhance them. This issue is especially important in relation to housing market areas, growth points and eco-towns, and in the revision of district housing figures. GI also has a role to play in providing renewable energy (bio fuels, including wood) Climate Change - both the need for mitigation and adaptation - needs to be taken into account. GI can help to adapt to climate change (for example see the "Adaptation Strategies for Climate Change in Urban Environments" (Asccue)" and "Climate Change and the Visitor Economy (CCVE)" Research Projects at the University of Manchester. Again Climate Change cuts across the issues mentioned above - for example, in choosing the locations and design guidance for new developments.</p>	
<a href="#">Individual</a>	Yes	Regeneration and reinvestment within the region is essential if economic growth is to be achieved. A key factor affecting this success is the resolution of socio-economic issues specifically relating to social housing, minority groups and opportunities.	
<a href="#">Individual</a>	No	<i>No comment recorded in response to this question</i>	
<a href="#">Individual</a>	Yes	We have to have a starting point	
<a href="#">Individual</a>	No	<i>No comment recorded in response to this question</i>	
<a href="#">individual</a>	Yes	I think there are also issues omitted like health	
NAI Erinaceous		<i>No comment recorded in response to this question</i>	
RPS Planning	Yes	<i>No comment recorded in response to this question</i>	

<b>Organisation:</b>	<b>1. Do you agree that these are key issues for the region and this review?</b>	<b>1a. If so why?</b>	<b>1b. If not, why not?</b>
Blackpool Equalities Forum	Yes	All of the issues are relevant to Blackpool as they are key factors of deprivation and social inequality. Along with employment, we consider housing to be central to quality of life issues, and are happy that it is included prominently within the selected issues.	
AGMA		<i>No comment recorded in response to this question</i>	
Satnam Planning Services Ltd	Yes	There is a huge unmet need for further housing in the North West to relieve housing shortages and to address affordability issues.	
Heswall Society	No	<i>No comment recorded in response to this question</i>	
The Wildlife Trust for Lancashire, Manchester & North Merseyside	Yes	We agree that they are key issues for this review. We do not agree that they are the only key issues for this region. Environmental Limits – The Inspectors report expressly states that the RSS failed to address this issue. Cross-cutting Issues - We also believe that environmental sustainability in general, and climate change in particular, should be considered more explicitly as cross-cutting themes in this Review. To quote the Panel Report; “we are not entirely convinced that environmental considerations have been weighted equally. We think that there is a tendency in some quarters to see the environment as a barrier to, rather than a bulwark for economic growth” (para 4.19) and “we think the Plan fails in some respects to tackle the environmental arm of sustainability” (para 4.20) Para 3.25 of the Panel report also makes the point that climate change was dealt with inadequately and must be mainstreamed throughout the RSS. The Project Plan should, consequently, show how environmental sustainability is to be embedded in the process. It is essential that the NWRA is provided with the resources to carry out this Review effectively.	
RSPB	Yes	An additional issue that should be reviewed is environmental limits since the Inspectors explicitly noted that the RSS failed to address this issue.	
Cumbria		<i>No comment recorded in response to this question</i>	

<b>Organisation:</b>	<b>1. Do you agree that these are key issues for the region and this review?</b>	<b>1a. If so why?</b>	<b>1b. If not, why not?</b>
County Council			
Individual	Yes	They include issues which I believe to be the most important to people in the North West	
Local Agenda 21 Waste Group		<i>No comment recorded in response to this question</i>	
Advantage West Midlands		<i>No comment recorded in response to this question</i>	
Environment Agency	Yes	Many of the issues being picked up under the partial review are outside the remit of the Environment Agency. However, we understand the reasoning behind the need to re-visit some of the waste policies and issues and welcome the chance to input to this area of any partial review. Also, there is currently an increased focus on housing delivery nationally. The North West is a region which has had more than its fair share of interest in new growth points and eco-towns. It is therefore very important that this topic area, and particularly any environmental and infrastructure capacity impacts which might result, gets properly debated through the partial review process. Our thoughts on these 3 partial review areas are expanded upon in more detail in section 2 below.	
Defend Lytham	Yes	The designation of sub-regional housing market areas, the revision of district housing figures and the potential location of growth points and eco-towns are policy areas wherein changes have been proposed at a rate and on a scale that the general public find hard to assimilate effectively. Furthermore, many of the arguments underpinning the proposals are statistically based while the assumptions made in constructing them are frequently treated cursorily, if at all, by the authorities promoting change. This is to be lamented as one could be forgiven for interpreting PPS3 as a developer's charter and as some local authorities adhere more to the letter of the law rather than its spirit in fulfilling their community involvement obligations. A truly transparent and inclusive consultation is therefore to	

<b>Organisation:</b>	<b>1. Do you agree that these are key issues for the region and this review?</b>	<b>1a. If so why?</b>	<b>1b. If not, why not?</b>
		be welcomed.	
Preston City Council	No	<i>No comment recorded in response to this question</i>	
Individual		<i>No comment recorded in response to this question</i>	
Upton Greenbelt Preservation Group	No	In the light of the reorganisations of Local Government in Cheshire to create 2 unitary authorities there will be considerable uncertainty about future development plans	
Knutsford Town Council	Yes	These matters appear regularly in the local press and its readers' letters pages as localised 'burning issues' affecting the quality of life of the citizens of the town. If we get this right the NW will be able to expand without impacting its identity.	
	No	<i>No comment recorded in response to this question</i>	
Forestry Commission	Yes	<p>The issues which we think are especially important and we have a specific interest that are being considered are;</p> <ul style="list-style-type: none"> <li>• Growth Points and Ecotowns – this provides a real opportunity to introduce green infrastructure planning and sustainable development principles right from the start.</li> <li>• Renewable energy – woodfuel biomass provides some real opportunities for renewable energy production in the region.</li> </ul> <p>The Waste and Housing issues are also significant and we support other members of the Defra network in their work around these.</p>	
Peel Holdings (Management) Ltd	Yes	No Comment.	

<b>Organisation:</b>	<b>1. Do you agree that these are key issues for the region and this review?</b>	<b>1a. If so why?</b>	<b>1b. If not, why not?</b>
North West Environment Link	Yes	<p>No problem with the issues identified BUT believe transport and environmental limits should be added to the list. Transport - the Regional Funding Allocation is to be reviewed in the Summer and needs now to take into account the transport implications of the new housing areas, new major waste facilities, growth points and key service centres. This needs to be done by integrating the RFA review into this RSS review which is looking at precisely these issues. Environmental Limits – The Inspectors report explicitly noted that the RSS had failed to address this issue. Cross Cutting Issues - We also believe that environmental sustainability in general and climate change in particular should be considered more explicitly as cross cutting themes in the Review. We feel that the lack of balance and inadequate treatment of climate change in RSS should not be replicated in this Review. To quote the Panel Report; “we are not entirely convinced that environmental considerations have been weighted equally. We think that there is a tendency in some quarters to see the environment as a barrier to, rather than a bulwark for economic growth” (para 4.19) and “we think the Plan fails in some respects to tackle the environmental arm of sustainability” (para 4.20) Para 3.25 of the Panel report also makes the point that climate change was dealt with inadequately and must be mainstreamed throughout the RSS. The Project Plan should therefore show how environmental sustainability will be embedded in the process. It is vitally important that NWRA is provided with the resources to carry out this Review effectively.</p>	
University of Cumbria	No	<i>No comment recorded in response to this question</i>	
Lancashire County Council		<i>No comment recorded in response to this question</i>	
Friends, Families and Travellers	Yes	<p>1a FFT is pleased that the partial review will encompass the housing needs of Gypsies and Travellers. The long established shortfall in provision should be addressed and we endorse this being examined as part of the partial review.</p>	

<b>Organisation:</b>	<b>1. Do you agree that these are key issues for the region and this review?</b>	<b>1a. If so why?</b>	<b>1b. If not, why not?</b>
<a href="#">Macclesfield Council</a>	Yes	<i>No comment recorded in response to this question</i>	

## Question Two – 2a. Sub-regional Housing Market Areas.

### Summary Responses

17 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues.

1. Local Planning Authorities need to be involved;
2. Other reports suggest that opportunities housing developing in Chester (and other characterful areas) are be limited, but with Warrington may be able to address issues of affordability;
3. Cross regional economic and housing issues need to be considered; and
4. The impact of new build on existing infrastructure, historic town centres and parking needs to be assessed fully in an inter-dependent way
5. There needs to be a clear and well publicised statement of:
6. the concept of an HMA;
7. how the designation of HMAs will impact upon policy;
8. the statistical basis of any HMA, including background assumptions; and
9. the sensitivity of HMA designations to the assumptions.
10. The current Growth Point bidding round will impact on this area of work
11. Public Support for HMA plans needs to be tested
12. It will be important to retain differential policies within HMAs to encourage urban concentrations & regeneration
13. Other issues
14. HNA focus can detract from physical and economic renewal
15. Maintaining an improvement in standards is important
16. Affordability
17. Difficulties of getting insurance when living on a flood plain
18. Flooding



1. Building on green belt, when brown field sites have run out

The table below shows the verbatim comments received.

<b>Organisation:</b>	<b>2a. Sub-regional Housing Market Areas.</b>
The National Trust	No specific comments.
Manchester City Council	<i>No comment recorded in response to this question</i>
Mersey Forest	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	The definition of sub-regional housing areas will provide a basis for redevelopment planning and strategic development in critical areas.
<a href="#">Individual</a>	With continuing pressure for ever more housing, a policy to prevent over-development (and consequently a decline in the high standard of living) in the 'honeypot' area of North Cheshire should be considered. Not a continuation of the policy (SD 4) in the extant RSS (RPG 13), which was a proposal rejected by the Panel following the last RSS EIP, but a different, improved version which would do more to help and promote areas in need of regeneration and improve their standard of living whilst at the same time protecting the North Cheshire Green Belt and the exceptional standard of living in this part of the North West. The aim should be to bring more areas up to the living standards enjoyed in North Cheshire - which is comparable to the best areas in the South of England - not to reduce the standard of living that exists there now.
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	<i>No comment recorded in response to this question</i>
NAI Erinaceous	PPS3 provides guidance indicating that the RSS should clearly define sub region-housing market areas. It is recommended that the PR will need to involve Local Planning Authorities in order to identify the HMA within the NW in order to address properly the policies within the RSS
RPS Planning	<i>No comment recorded in response to this question</i>
Blackpool Equalities Forum	Housing issues in Blackpool are very different to those elsewhere. We identified the following: -Large number of Houses of Multiple Occupancy (HMOs), taken up by older people, migrant worker and transient population. These are often in poor condition. - Large numbers of investment property available (buy to

Organisation:	2a. Sub-regional Housing Market Areas.
	let). The lower end of the market (where properties are worth £100, 000 and under) is very mobile, and new 'high-end' developments are trying to attract big institutional investors. This highlights the differences in incomes in the area.
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	We are interested in the Warrington and Chester housing areas, both areas where further housing can address regional problems of shortage of supply and affordability.
Heswall Society	1. We are concerned that the focus on Sub-Regional Housing Market Areas could detract from the need to turn areas of physical and/or economic decline into places where people want to live and work. 2. We are concerned that the focus on Sub-Regional Housing Market Areas could lead to excessive pressure in some areas even to the extent of destroying the characteristics which currently make them attractive.
The Wildlife Trust for Lancashire, Manchester & North Merseyside	No comment at this stage.
RSPB	<i>No comment recorded in response to this question</i>
Cumbria County Council	a report was prepared for a meeting of the Cumbria Planning Group on the 15th February 2008, where it was agreed the County Council should: reinforce the position that Key Service Centres had been defined and agreed in Cumbria, and that there is widespread ownership of them by all organisations in developing their services and development proposals;
Individual	I would like to receive information on this issue because I cannot understand how it will work and what effect it will have on the people living in Housing Market Restructuring Areas
Local Agenda 21 Waste Group	HOUSING ISSUES • Housing – flooding – insurance, new housing on the flood planes, people cannot get house and content insurance, or cannot afford high rates of insurance, they will not be able to even insure their personal possessions, thus are not protected against other problems like burglary, what is the gov't going to do about this? • In terms of affordability, nobody has defined what affordability is, this means different things to different people. We need a definition for what this means in terms of pounds. • Warrington has already built more than double its housing quota and what do the government partners propose for the future in Warrington • In terms of housing sooner or later the greenbelt areas in the North West will need to be encroached on as we are running out of brown sites, so why don't we start the debate now.
Advantage West Midlands	I note the review will be in part directed at housing. You will of course be aware of the work being undertaken on the spatial relationships between South Cheshire and North Staffordshire / North Shropshire, focussing on an area covering the local authority boundaries of Crewe and Nantwich,

Organisation:	2a. Sub-regional Housing Market Areas.
	Congleton, Staffordshire Morrlands, Stoke on Trent, Newcastle under Lyme, and North Shropshire. As such, the West Midlands will have an interest in the sub regional housing distributions being promoted through the review process, with regard to the dynamics of the economy and housing markets in Cheshire and the wider study area.
Environment Agency	no comment
Defend Lytham	<p>The designation of housing market areas (HMAs) is a science that is in its infancy, is normally predicated upon a set of subjective assumptions and is frequently based upon historical data. However, conclusions are usually stated in rather exact terms and can leave the impression that there is no role for further input. What is more, the process often involves collaboration between local authorities that is not made openly evident to the communities covered. There needs to be a clear and well publicised statement of:</p> <ul style="list-style-type: none"> <li>• the concept of an HMA</li> <li>• how the designation of HMAs will impact upon policy</li> <li>• the statistical basis of any HMA, including background assumptions</li> <li>• the sensitivity of HMA designations to the assumptions.</li> </ul>
Preston City Council	It is difficult to comment on this until the outcome of the current Growth Point bidding round is known as it will have a bearing.
Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	<p>The Report of the Panel RSS stated 'Housing in Chester is relatively expensive. Much of the City is worthy of conservation. A Green Belt which serves to protect its setting restricts its outward growth. The expansion of the built up area is also constrained by the flood plain of the River Dee. In view of these considerations, opportunities to provide additional housing in Chester must be limited' (Panel Report paragraph 5-37). The Panel Report 6.7 stated - 'Some house builders pressed for an increased housing allocation in Chester ..... we are not persuaded that this would be desirable, having regard to the importance of conserving the City's special character and preserving its Green Belt setting.</p>
Knutsford Town Council	It is essential that the impact of new build on existing infrastructure, historic town centres and parking is assessed fully in an inter-dependent way rather than piecemeal in isolation.
<a href="#">Crewe and Nantwich Council</a>	Will this be of sufficient value to inform LPas Core Strategies?
Forestry Commission	<i>No comment recorded in response to this question</i>
Peel Holdings (Management) Ltd	We are concerned that there will be no opportunity for interested stakeholders and the public to comment upon the conclusions of the work commissioned to identify Sub-Regional Housing Market Areas before work is commissioned to undertake the Assessments of each identified Area (including assessments of need, total future numbers of households etc). The identification of Housing Market Areas will be

<b>Organisation:</b>	<b>2a. Sub-regional Housing Market Areas.</b>
	fundamental to the Partial Review in so far as it relates to the housing matters and is likely to be an issue on which many stakeholders and others will have strong views. The opportunity should be taken to test the support or otherwise for the Areas proposed by the research before committing to further research which relies on the identification of these Areas.
North West Environment Link	We accept that PP3 means that this issue must be included. However, it is likely that HMA boundaries will be 'fudged' to line up with individual or groups of local authority boundaries. It will be important to retain differential policies within HMAs, eg to encourage urban concentrations & regeneration (as most HMAs will cover both rural and urban areas).
University of Cumbria	<i>No comment recorded in response to this question</i>
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	<i>No comment recorded in response to this question</i>
<a href="#">Macclesfield Council</a>	<i>No comment recorded in response to this question</i>

## Question Two – 2b. Revision of District Housing Figures.

### Summary Responses

18 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues

1. In order for a revision of current housing figures each LPA within the NW will need to supply up to date accurate information on their housing land availability
2. The issue of environmental capacity (see response under 1b above) is very relevant to any revision of housing figures and needs to be considered 'up front'.
3. There surely needs to be means put in place to ensure that the housing that is forthcoming is of the type required and not simply acres upon acres of one and two bedroom apartments.
4. This approach risks causing confusion, particularly for those districts (all of the GM authorities) preparing Core Strategies that have to be generally compliant with RSS
5. concern about any potential diminution in housing numbers
6. Any changes will also need to consider;
  - the rural context
  - Affordability
  - Design and need
  - The economy of the North West
  - Maintaining character
  - The need for social housing
  - Poor conditions of some housing stock

<b>Organisation:</b>	<b>2b. Revision of District Housing Figures.</b>
The National Trust	No specific comments.
Manchester City Council	This approach risks causing confusion, particularly for those districts (all of the GM authorities) preparing Core Strategies that have to be generally compliant with RSS. The uncertainty over housing figures makes the LDF process very difficult for those districts (all in Greater Manchester for example) that are currently preparing their Core Strategies. Manchester, along with other AGMA colleagues seek a reassurance that if the Partial Review proceeds on the terms currently set out, that Core Strategies will not be found unsound if they are developed within the (soon to be) adopted RSS framework, notwithstanding the emergence of new partial review figures by the time we are at Examination.
Mersey Forest	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	A pre-requisite of any strategic development plan is the implementation and maintenance of a long term housing strategy. By aligning this model with national targets and emphasising the importance within individual redevelopment/regeneration opportunities a more successful and realistic objective can be made.
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	<i>No comment recorded in response to this question</i>
NAI Erinaceous	The RSS Panel Report in March 2007 set out the latest district housing figures for the North West. In addition to this slight increase in housing figures the NHPAU has estimates that 270,000-280,000 new homes will be required for the plan period, increasing the panel report figure of 23,111 proposed dwellings to approximately 28,000-32,000 dwellings per year in order to keep affordability at its current situation. In order for a revision of current housing figures each LPA within the NW will need to supply up to date accurate information on their housing land availability. In theory this should be a simple procedure however not all LPA are at the same stages of the LDF and therefore may not have produced a "Call for Sites" DPD or have up to date information
RPS Planning	The Project Plan should make it clear what period the RSS Partial Review will cover - will the end date be 2026 or 2031?
Blackpool Equalities Forum	<ul style="list-style-type: none"> <li>• Lack of affordable housing, in Blackpool it appears to be acquired by private landlords as soon as it is available.</li> <li>• Social Housing is generally below par, there is a very high demand, and existing properties are few in number, quite old and in need frequent repairs. There is a lack of properties with more than 1</li> </ul>

Organisation:	2b. Revision of District Housing Figures.
	<p>bedroom, and those with 2+ bedrooms are in very deprived areas. The 1 bedroom properties also tend to be in tower blocks.</p> <ul style="list-style-type: none"> <li>• There is a lack of knowledge in the community regarding entitlements. There is a lot of help available to bring housing up to an acceptable standard for both owner/occupiers and tenants. People may be reluctant to be seen as accepting handouts or charity (especially older people) or find the forms difficult to complete.</li> </ul>
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	More provision for Warrington and Chester should be made to reflect the potential of both areas to provide further housing without breaching strategic constraints.
Heswall Society	<ol style="list-style-type: none"> <li>1. The Minister for Housing and Planning has recently stated (letter to B. Chapman, MP) that at the time of the 2003 RSS "the Secretary of State reduced the overall amount of house building when he approved the North West RSS in 2003. That was justified at the time. There had been a history of over-supply in the region because of over-optimistic migration assumptions".</li> <li>2. This Review follows an exceptional period in economic terms and in EU expansion. We are yet to see the outcome. What will be the effect of the economic downturn following the unprecedented UK and international growth. In the downturn will some immigrants return home; as the economies balance across the EU will EU citizens tend to return. Are we in danger of a return to "over-optimistic" projections? (see 1 above)</li> <li>3. We are concerned that new District housing figures could detract from the need to turn areas of physical and/or economic decline into places where people want to live and work.</li> <li>4. We are concerned that new District housing figures could lead to excessive pressure in some areas even to the extent of destroying the characteristics which currently make them attractive.</li> <li>5. We recognise the need for rented and social housing provision. In the context of an ageing population we recognise the special need for facilitating attractive elderly accommodation.</li> </ol>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	The issue of environmental capacity (see response under 1b above) is very relevant to any revision of housing figures and needs to be considered 'up front'. Para 6.38 of the Panel Report supports this view. Community 'buy-in' to any major revisions will need to be secured.
RSPB	<i>No comment recorded in response to this question</i>
Cumbria County Council	a report was prepared for a meeting of the Cumbria Planning Group on the 15th February 2008, where it was agreed the County Council should: express concern about any potential diminution in housing numbers for the Cumbria sub-region arising out of the Review;
Individual	The housing targets and the minimum density requirements have resulted in the reappearance of the

<b>Organisation:</b>	<b>2b. Revision of District Housing Figures.</b>
	high rise flats. Is this deliberate policy? And have the consequences of this policy been fully considered.
Local Agenda 21 Waste Group	<i>No comment recorded in response to this question</i>
Advantage West Midlands	<i>No comment recorded in response to this question</i>
Environment Agency	<p>At the EiP for draft RSS, issues around environmental and infrastructure capacity impacts of 411,000 new homes were raised. This debate led to some specific proposed revisions to policy to ensure that these impacts were properly managed thereby assuring that growth and development in the region was sustainable. There has already been a clear indication (from both Government and the Regional Assembly) that the partial review will need to test even higher annual rates of housing growth right up until 2031. It is therefore imperative that the overall sustainability impacts of any proposed increase in growth rates is properly considered. This can only properly happen through the spatial planning process and through the partial review of RSS. This process needs to carefully consider if: A) current policies in any proposed/adopted RSS will enable the growth to come forward sustainably, served in a timely manner by any necessary critical infrastructure; or B) if beyond a certain point environmental or infrastructure capacity will be breached or it will become a major limiting factor to delivery of higher rates growth within the expected time horizons. It is critical that a robust evidence base is developed to help us understand these questions and support the development of options and policies within the Partial review of RSS and as we move towards an integrated regional strategy.</p>
Defend Lytham	<p>Population and household projections through to 2020 and beyond that are based on historic trends and particular assumptions risk bringing forecasting into disrepute, particularly when the results are presented as though they are facts. Three recent developments provide simple illustrations of this point:</p> <ul style="list-style-type: none"> <li>• economic growth is now slowing; a factor that is widely accepted as influencing household formation and migration rates</li> <li>• house prices are falling</li> <li>• migration from Central and Eastern Europe now appears to be reversing as the home economies continue to grow much more rapidly than those in the EU-15.</li> </ul> <p>These outcomes were not foreseen when the housing figures were promulgated initially. The basis of the revised housing figures needs to be explained clearly, as does their sensitivity to the underlying assumptions. Few deny the need for more housing, but many cannot understand housing requirements that inflate by enormous percentages, apparently overnight. In any event, there surely needs to be means put in place to ensure that the housing that is forthcoming is of the type required and not simply acres upon acres of one and two bedroom apartments.</p>
Preston City	It is difficult to comment on this until the outcome of the current Growth Point bidding round is known as



<b>Organisation:</b>	<b>2b. Revision of District Housing Figures.</b>
Council	it will have a bearing.
Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	<i>No comment recorded in response to this question</i>
Knutsford Town Council	It is essential that the impact of new build on existing infrastructure, historic town centres and parking is assessed fully in an inter-dependent way rather than piecemeal in isolation.
<a href="#">Crewe and Nantwich Council</a>	What methodology is to be used? Are they to be targets, ceilings or whatever?
Forestry Commission	<i>No comment recorded in response to this question</i>
Peel Holdings (Management) Ltd	No comment.
North West Environment Link	The issue of environmental capacity (see 1a above) is very relevant to to any revision of Housing figures and needs to be considered 'up front'. Para 6.38 of the Panel Report supports this view. There is also a need to secure community 'buy-in' to any major revisions.
University of Cumbria	The University understands that there will be pressure to revise upwards the housing allocations in the draft RSS in response to the Housing Green Paper in order to address the issue of affordability. The University supports the statement that 'In addition we will seek to ensure that affordability in rural areas is given full consideration' in the Draft Project Plan. To this end any affordability housing targets that are set for the region will also need to be extended to the sub regions to take into account the crisis in availability of affordable homes in rural areas. Furthermore it would be helpful to introduce a degree of flexibility in housing allocations that would allow them to take into account demands generated by regeneration initiatives in West Cumbria and an increasing aspirational population in Cumbria resulting from increased educational participation, rising skills levels and the potential increase in knowledge based industry.
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	<i>No comment recorded in response to this question</i>

<b>Organisation:</b>	<b>2b. Revision of District Housing Figures.</b>
<a href="#">Macclesfield Council</a>	Under the current Local Government Review, Macclesfield, Congleton and Crewe and Nantwich districts will become Cheshire East on the 1st April 2009. The submission of the revised draft RSS to the Secretary of State will occur after this date. It would therefore be appropriate to consider the review of district housing figures based on the new authority boundaries from the start of the review process, rather than aggregating individual districts' figures at a later date.

## Question Two – 2c. Growth Points and Eco-towns.

### Summary Responses

15 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues

1. In order for the PR to incorporate areas as growth points and create eco towns, the review will need to rely on other segments of the RSS, such as housing figures. It is reliant on those being reviewed first
2. Eco-towns should be exemplar developments applying the highest environmental standards and combining the provision of well designed, appropriately timed and sufficiently funded green infrastructure with the protection and enhancement of existing biodiversity and protected sites
3. Growth points should be managed with regard to sustainability issues
4. The economic benefits need to be demonstrated
5. Communities need to be involved in the process
6. The plans for growth point need rigorous testing against a set of clear criteria
7. Growth points are an opportunity not to be missed

The following table shows the verbatim comments from participants;

<b>Organisation:</b>	<b>2c. Growth Points and Eco-towns.</b>
The National Trust	It is unclear to what extent eco-towns will be a 'here and now' issue given the timescale proposed for the partial review. However, if this matter is to be addressed through that Review then a considerable amount of evidence gathering will need to be gathered and tested at an early stage. This will need to consider a range of matters relating to environmental capacity.
Manchester City Council	The Project Plan has been produced in advance of the GONW revisions to draft RSS being published. These are now expected in March and would reasonably have been anticipated to take on board the proposals for Growth points/Eco towns where appropriate. This would seem to negate the need to review draft RSS for this policy area, one of the stated main drivers behind the proposal. It is understood however that this is not likely to be the case and the Growth

Organisation:	2c. Growth Points and Eco-towns.
	Point / Eco Town proposals are to be 'tested' through the Partial Review process. This is extremely unhelpful and counter to Government's objective to accelerate housing delivery, as we will be bringing forward development on the ground at the same time as we are justifying this development at Examination in Public.
Mersey Forest	
<a href="#">Individual</a>	The North West in general and Cumbria in particular, are well suited to the established criteria for both Growth Points and Eco-Towns. The opportunity to maximise this potential should not be missed.
<a href="#">Individual</a>	Growth Points and Eco Towns are new concepts which have sprung from central government and which have not yet been properly defined. Any new policies in relation to them must incorporate all relevant environmental and sequential land-use tests and must be cognisant of the over-arching strategies/requirements in relation to climate change and sustainable development.
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	<i>No comment recorded in response to this question</i>
NAI Erinaceous	There are a number of bids received from LA within the NW for consideration as growth points. There have also been proposals for Eco Towns in East Cheshire, West Cumbria and Carrington in Greater Manchester. However, in order for the PR to incorporate areas as growth points and create eco towns, the review will need to rely on other segments of the RSS, such as housing figures. It is reliant on those being reviewed first.
RPS Planning	<i>No comment recorded in response to this question</i>
Blackpool Equalities Forum	<p>We were unclear on what was meant here, as the document didn't explain clearly. We identified issues around:</p> <ul style="list-style-type: none"> <li>• Reusing property, there is a significant amount of redevelopment in the area, usually involving the demolition of one large property to be replaced with a number of self contained apartments. We feel that this is a good way to create more affordable new housing in a way that limits expansion into undeveloped or Greenfield sites. We did note that there will be a probable strain on other resources, e.g. public transport systems, utilities, doctor's surgeries, schools, etc.</li> <li>• Bringing existing housing up to standard so that new development is limited (this also relates to entitlements as mentioned in 2b.</li> <li>• Any new development should take access issues (for people with disabilities) into consideration. Roads need to be wide enough to discourage people from parking on the</li> </ul>

Organisation:	2c. Growth Points and Eco-towns.
	<p>pavements. Cars parked on pavements make it extremely difficult for wheelchair users to pass, and damage the pavement structure creating hazards for visually impaired people.</p> <ul style="list-style-type: none"> <li>• Good public transport systems must be considered at the initial planning stage of any new developments, to discourage the use of private vehicles. A number of households have 2-3 cars, which needs to be factored into any planning considerations, an excess of private vehicles will not only lead to parking/disabled access issues but matters of road safety (for drivers and pedestrians), congestion and environmental damage.</li> </ul>
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	Warrington has applied to be a Growth Point.
Heswall Society	<p>There is always uncertainty about population projections. Creating new centres carries particular risks if projected growth fails to materialise. Furthermore, new centre require their own full range of services. All construction is high in energy usage and consequent carbon emissions and adds to impermeability of the ground surface and potentially to the loss of land which might be of use for agricultural / biofuel purposes in the future even if not so used at present. Caution needs to be exercised when considering such developments.</p>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	<p>We are concerned that these should take account of environmental capacity. We are concerned that these should not impact significantly on established biodiversity resources. We expect these to deliver management, restoration, re-establishment and creation of key habitats and species in accordance with UK and Local Biodiversity Action Plan targets. Growth point and 'eco-town' proposals should be rigorously tested through the planning system to assess whether:</p> <ul style="list-style-type: none"> <li>• there is a need for them,</li> <li>• they fit RSS principles, and are the most sustainable option – not just 'retro-fitted' into RSS.</li> </ul> <p>Eco-towns should be exemplar developments applying the highest environmental standards and combining the provision of well designed, appropriately timed and sufficiently funded green infrastructure with the protection and enhancement of existing biodiversity and protected sites. The following tests could be usefully be applied:</p> <ul style="list-style-type: none"> <li>• The public and affected communities should be fully consulted;</li> <li>• Schemes should be tested through regional spatial strategy and local development framework reviews; · There needs to be evidence that any new settlement is the most sustainable option for accommodating housing growth when compared with other options such as existing brownfield sites or urban extensions;</li> <li>• Schemes should demonstrate efficient use of land, with densities capable of supporting public transport;</li> </ul>

Organisation:	2c. Growth Points and Eco-towns.
	<ul style="list-style-type: none"> <li>• They should be genuinely carbon neutral, taking into account potential emissions from land-drainage, transport and buildings (in construction and use);</li> <li>• They should foster a strong sense of place and community, achieve CABE gold Building for Life standards, with high quality public spaces, architecture and street layouts that give priority to pedestrians;</li> <li>• They should be subject to an independent landscape character appraisal, be sympathetic to their setting and clearly enhance the local landscape, built and natural environment;</li> <li>• They should include measures designed to conserve water and other natural resources, minimise soil, air, noise and light pollution and achieve zero waste;</li> <li>• They should be complete communities with homes (with at least 50% affordable), schools, workplaces, community and health facilities etc;</li> <li>• They should have high quality public transport providing good access to nearby settlements and local supply networks.</li> </ul>
RSPB	Eco-towns should be exemplar developments which apply the highest environmental standards and combine the provision of well designed, appropriately timed and sufficiently funded green infrastructure with the protection and enhancement of existing biodiversity and protected sites. RSPB support for eco-towns is subject to them being located in appropriate places and designed and implemented to sufficiently high standards. Eco-towns should not mask the wider need to improve the standards of housing in general. Further work is still needed to improving all new housing that comes forward for development and for making improvements to existing housing stock.
Cumbria County Council	<i>No comment recorded in response to this question</i>
Individual	No comment
Local Agenda 21 Waste Group	<i>No comment recorded in response to this question</i>
Advantage West Midlands	<i>No comment recorded in response to this question</i>
Environment Agency	Growth points and Eco-towns raise similar issues for a partial review to the revision of the district housing figures. However, they could accelerate any pressures on the environment/critical infrastructure. Whilst the growth points don't really represent brand new areas of additional growth, they do propose bring forward more quickly the delivery of sites which would have come through the planning system in the longer term. The need to deliver at least a 20% up-lift on

Organisation:	2c. Growth Points and Eco-towns.
	draft RSS rates of growth by 2016 will mean that any potential capacity issues in successful growth point areas, especially with regards critical infrastructure, could arise faster, making them be even more challenging to plan for and overcome. We need to specifically examine this, ensuring that all the work which will be done on growth points over the next 6 months (including United Utilities business planning process) informs any partial review. Finally, there will be a need to re-visit the regional flood risk appraisal generally in terms of the partial review of RSS. In particular as we get a clearer idea of the spatial extent of growth points or any eco-town, a revised RFRA should consider the impacts of flood risk of any specific growth point development locations.
Defend Lytham	The concept of a Growth Point has been disseminated imperfectly, at best. Also, the benefits of Growth Point designation have not been demonstrated. The latter might perhaps be explored by an examination of the post-designation experiences of the New Growth Points in the East and West Midlands and in the South East. It needs to be borne in mind that concentrations of new housing do not necessarily translate into improved economic performance and some areas are already experiencing gluts of new development, with properties that do not sell. Communities also need to be better informed about the grounds on which they can object to their local authority's participation in Growth Point bids. The underlying principles of Eco-Towns are already subject to challenge, with the refurbishment of existing buildings being found to be much more environmentally friendly than new build. This whole debate needs to be rehearsed in public, with the alternatives stated clearly.
Preston City Council	It is difficult to comment on this until the outcome of the current Growth Point bidding round is known as it will have a bearing.
Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	<i>No comment recorded in response to this question</i>
Knutsford Town Council	<i>No comment recorded in response to this question</i>
<a href="#">Crewe and Nantwich Council</a>	This depends on the Government's shortlist.
Forestry Commission	There is a real opportunity for our region to use this national policy positively for the region to integrate GI thinking from the start to try to maximise the economic, social and environmental benefits. We need to ensure SD principles are at the foundation of this initiative. Our lead on Growth agenda and GI is Lee Dudley – please contact him for more information –

<b>Organisation:</b>	<b>2c. Growth Points and Eco-towns.</b>
	lee.dudley@forestry.gsi.gov.uk
Peel Holdings (Management) Ltd	No comment.
North West Environment Link	<p>These should be rigorously tested through the planning system, including assessing whether there is a need for them, they fit RSS principles, and are the most sustainable option – not just ‘retro-fitted’ into RSS. Eco-towns should be exemplar developments which apply the highest environmental standards and combine the provision of well designed, appropriately timed and sufficiently funded green infrastructure with the protection and enhancement of existing biodiversity and protected sites. The following tests could be usefully be applied;</p> <ul style="list-style-type: none"> <li>• The public and affected communities should be fully consulted;</li> <li>• Schemes should be tested through regional spatial strategies and local development framework reviews;</li> <li>• There needs to be evidence that any new settlement is the most sustainable option for accommodating housing growth compared with other options like existing brownfield sites or urban extensions;</li> <li>• Schemes should demonstrate efficient use of land, with densities capable of supporting public transport;</li> <li>• They should be genuinely carbon neutral, taking into account potential emissions from transport and buildings (in construction and use);</li> <li>• They should foster a strong sense of place and community, achieve CABI gold Building for Life Standards, with high quality public spaces, architecture and street layouts that give priority to pedestrians;</li> <li>• They should be subject to an independent landscape character appraisal, be sympathetic to their setting and clearly enhance the local landscape, built and natural environment including through the designation of new Green Belt where appropriate;</li> <li>• They should include measures designed to conserve water and other natural resources, minimise soil, air, noise and light pollution and achieve zero waste;</li> <li>• They should be complete communities with homes (with at least 50% affordable), schools workplaces community and health facilities etc;</li> <li>• They should have high quality public transport providing good access to nearby settlements and local supply networks.</li> </ul>
University of Cumbria	<i>No comment recorded in response to this question</i>



<b>Organisation:</b>	<b>2c. Growth Points and Eco-towns.</b>
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	<i>No comment recorded in response to this question</i>
<a href="#">Macclesfield Council</a>	<i>No comment recorded in response to this question</i>

## Question Two – 2d. Renewable Energy.

### Summary Responses

13 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues

1. Site for renewable energy need to be located where they will not increase CO2 outputs and where they will not cause harm to wildlife
2. Any work needs to consider research that has already taken place, for example, research on water power in the Mersey Basin
3. Any work needs also to acknowledge recent government announcements re nuclear power
4. The North West contains considerable opportunities for the development of a full range of renewable energy sources
5. Bottom up approaches are needed to develop this work area

The following table shows the participant's verbatim comments;

<b>Organisation:</b>	<b>2d. Renewable Energy.</b>
The National Trust	It will be important to be clear about the potential role that a) energy conservation through high quality design and retrofitting, and b) micro-generation can have in reducing the need for new energy generation including renewables. In this regard attention is drawn, in respect of low energy use/energy conservation to the recently published report 'Volume' which sets out the practical outcomes in respect of the major housing development at Stamford Brook in Trafford (a copy of the report can be provided on request). It will be necessary for proper assessment, based in part upon environmental capacity, to address the potential for such broad areas to be identified. This will not only need to consider statutory designations (including their wider settings) but also take a 'bottom up' approach that has regard to various detailed studies relating to renewables and landscape character such as the recently Adopted Wind Energy SPD for Cumbria.
Manchester City Council	<i>No comment recorded in response to this question</i>
Mersey Forest	<i>No comment recorded in response to this question</i>

<b>Organisation:</b>	<b>2d. Renewable Energy.</b>
<a href="#">Individual</a>	The importance of Renewable Energy cannot be over stressed. The West Coast has substantial opportunity for the development of wind farms, wave farms and alternatives providign the correct political approach is taken. By creating incentives and associated development/regeneration opportunities the use of Renewable Energy could be enhanced and would represent an example of Global Best Practice.
<a href="#">Individual</a>	NW TAR endorses the emerging North West Environment Link 'Common Position' paper on renewable energy and the energy hierarchy it extolls.
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	Trafford council have proved unimaginative when approached by voluntary groups like Friends of Parks wanting water storage etc
NAI Erinaceous	<i>No comment recorded in response to this question</i>
RPS Planning	<i>No comment recorded in response to this question</i>
Blackpool Equalities Forum	<ul style="list-style-type: none"> <li>• We identified that Blackpool had a lot of potential regarding renewable energy, our west coast location means that we have the potential to harness wind power, solar energy and tidal power.</li> <li>• We were unaware of what is happening already, e.g. “where does the energy come from?” and “where does it go?” We feel that this information could be included in local plans (e.g. Blackpool’s Masterplan) along with any corresponding targets.</li> <li>• We are aware that Blackpool Council has its first energy-efficient building in the shape of the Solaris Centre, which uses wind turbines and solar roof panels. It was designed to be a zero energy building (producing more energy than it uses), surplus energy is sold back to the national Grid. We believe that new Government buildings and community facilities should follow the example of the Solaris, following the principles of sustainability and acting as an example of good practice to the local and regional community.</li> </ul>
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	<i>No comment recorded in response to this question</i>
Heswall Society	<ol style="list-style-type: none"> <li>1 It is important not just to consider renewable energy but also the impact of other development policies on carbon footprint.</li> <li>2 In identifying a balanced portfolio of renewable energy resources we would suggest inclusion of the Mersey Forest and its potential for expansion.</li> <li>3 We would argue against the development for housing, retail or commercial uses of Green Belt or</li> </ol>

Organisation:	2d. Renewable Energy.
	green space or other sites which might contribute to biofuel or food.
The Wildlife Trust for Lancashire, Manchester & North Merseyside	<p>Renewable energy developments will need to be located:</p> <ol style="list-style-type: none"> <li>1. where their construction and operation does not cause more carbon release (e.g. through oxidation of peat) than these potentially prevent and where it does not impede the restoration of peatland to deliver substantial carbon sequestration.</li> <li>2. where they are not likely to significantly impact on internationally, nationally, or regionally important wildlife habitats or species populations; particularly: <ul style="list-style-type: none"> <li>• migrating and over-wintering birds – large wildfowl (geese and swans) appear particularly vulnerable in their interactions with coastal plain wind turbine array developments</li> <li>• regionally or sub-regionally important populations of breeding birds – “bio-fuel” developments on lowland farmland are of particular potential concern in this regard</li> <li>• regionally or sub-regionally important populations of bats (all species) and their foraging grounds – though data on such populations in NW England is lacking. (Some general background on the issue as it relates to planning systems is provided by EUROBATS, through the Bat Conservation Trust web site at <a href="http://www.bats.org.uk/news_events/documents/EUROBATSWindTurbinesResolutionAnnex.pdf">http://www.bats.org.uk/news_events/documents/EUROBATSWindTurbinesResolutionAnnex.pdf</a>.)</li> <li>• areas functionally linked to designated sites and other important areas – already identified in the Cumbria sub-regional spatial planning document</li> </ul> </li> </ol>
RSPB	<p>RSPB welcomes a strategic review of renewable energy. A key issue will be to ensure that those areas that are important for wildlife and which do not currently receive statutory protection are not damaged. In our view these are amongst the most vulnerable areas. A number of criteria are proposed:</p> <ul style="list-style-type: none"> <li>• Nature conservation designation sites (SSSI, SAC, SPA, RAMSAR) should absolutely NOT be considered for the location of renewable schemes.</li> <li>• Any additional guidance should dovetail in with existing, designated site legislation and this should be adhered to at all times.</li> <li>• It is important to identify areas where “sensitive bird” species occur in “important populations” around designated sites and in other important areas (e.g. lowland wet grassland sites, wintering bird areas e.g. geese, swans, hen harriers and farmland hot spots for farmland birds.</li> <li>• Buffer areas will be required around designated sites plus other important bird areas.</li> <li>• It will be important to identify areas, which are functionally linked to designated sites and other important areas.</li> <li>• Each renewable type of energy will need modified criteria based on its potential impact on biodiversity.</li> </ul>
Cumbria County	A report was prepared for a meeting of the Cumbria Planning Group on the 15th February 2008, where it

<b>Organisation:</b>	<b>2d. Renewable Energy.</b>
Council	was agreed the County Council should: emphasise the increasing concerns about the emerging conclusions regarding the research on sustainable energy, with particular regard to the importance of addressing wave, tidal and hydro opportunities and the considerable opposition to any further land wind turbines.
Individual	I shall be attending the workshop on the 31 March and submitting further detailed information on the siting of wind farms on peat moorland and the consequences of this policy.
Local Agenda 21 Waste Group	<i>No comment recorded in response to this question</i>
Advantage West Midlands	<i>No comment recorded in response to this question</i>
Environment Agency	no comment
Defend Lytham	<i>No comment recorded in response to this question</i>
Preston City Council	No comment at this stage
Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	<i>No comment recorded in response to this question</i>
Knutsford Town Council	<i>No comment recorded in response to this question</i>
<a href="#">Crewe and Nantwich Council</a>	No comment
Forestry Commission	<p>In the Northwest of England we have a significant resource of under and unmanaged woodland capable of producing woodfuel, especially for heating. There are other sources too such as waste wood, arisings from tree surgery and energy crops. There is a Regional Biomass Woodfuel Strategy as well as a national Woodfuel Strategy which identify the main opportunities. The greatest area for potential growth in our region lies in medium scale heat projects at a community scale, where the fuel is sourced locally. Such projects provide opportunities for</p> <ul style="list-style-type: none"> <li>• local employment</li> <li>• tackling fuel poverty</li> </ul>

Organisation:	2d. Renewable Energy.
	<ul style="list-style-type: none"> <li>• reducing greenhouse gas emissions</li> <li>• Education and demonstration on renewable energy and woodland management Please contact our regional lead on Woodfuel Peter Fox for more information – peter.fox@forestry.gsi.gov.uk</li> </ul>
Peel Holdings (Management) Ltd	Peel, in partnership with the NWDA and the Mersey Basin Campaign, is studying the potential to derive renewable tidal energy from the River Mersey. A considerable amount of work has already been carried out in investigating this potential (please visit the website <a href="http://www.merseytidalpower.co.uk">www.merseytidalpower.co.uk</a> ). It is therefore vital that the consultants appointed by the NWRA to carry out the renewable energy research described in the draft Project Plan familiarise themselves with the work done to date. To this end, they should establish a dialogue with Peel and its Partners.
North West Environment Link	<p>We acknowledge that, due to PPS22, there is a need to identify broad areas but the limitations on this process needs to be recognised. All proposals will still need to be assessed on a case by case basis. NWEL welcomes a strategic review of renewable energy. A key issue will be to ensure that those areas that are important for wildlife and which do not currently receive statutory protection are not damaged. In our view these are amongst the most vulnerable areas. A number of criteria are proposed:</p> <ul style="list-style-type: none"> <li>• Nature conservation designation sites (SSSI, SAC, SPA, RAMSAR) should absolutely NOT be considered for the location of renewable schemes.</li> <li>• Any additional guidance should dovetail in with existing, designated site legislation and this should be adhered to at all times.</li> <li>• It is important to identify areas where “sensitive bird” species occur in “important populations” around designated sites and in other important areas (e.g. lowland wet grassland sites, wintering bird areas e.g. geese, swans, hen harriers and farmland hot spots for farmland birds. • Buffer areas will be required around designated sites plus other important bird areas.</li> <li>• It will be important to identify areas, which are functionally linked to designated sites and other important areas – this has indeed been done for the Cumbria spatial planning document</li> <li>• Each renewable type of energy will need modified criteria based on its potential impact on biodiversity - for example onshore wind facilities should avoid degrading peatland habitat, an important carbon sequestration source.</li> </ul>
University of Cumbria	The University recognises that it would be helpful to identify broad locations for renewable energy sites given the government's intention to increase capacity in this area. Careful consideration will also need to be given to the outcomes of the recent Government consultation on nuclear power, and the possibility of existing nuclear sites being earmarked for new nuclear build.
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families	<i>No comment recorded in response to this question</i>

<b>Organisation:</b>	<b>2d. Renewable Energy.</b>
and Travellers	
<a href="#">Macclesfield Council</a>	<i>No comment recorded in response to this question</i>

## Question Two – 2e. Waste.

### Summary Responses

10 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues

1. It is important that the provision of a waste facility does not drive down work towards improving waste minimisation;
2. Any plans need to be based on robust evidence;
3. Householders, industry and the private sector may still need more education in this area, possibly linked to incentives; and
4. Any North West policies need also to consider nuclear waste.

The following table shows the verbatim comments inputted by participants

<b>Organisation:</b>	<b>2e. Waste.</b>
The National Trust	No specific comments.
Manchester City Council	<i>No comment recorded in response to this question</i>
Mersey Forest	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	Coordination and implementation of a long-term Waste Management strategy can only be achieved through the education of both industry and the private sector. The use of innovation and enhanced waste management systems can only enhance the environment and if managed correctly could establish a standard of Global Best Practice.
<a href="#">Individual</a>	NW TAR supports the position of the North West Waste Froum
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	<i>No comment recorded in response to this question</i>



<b>Organisation:</b>	<b>2e. Waste.</b>
<a href="#">individual</a>	Trafford Council's waste policy while laudible in its 20/21 strategy in practice does not work so exasperated householders regularly use the landfill sites with waste intended to be recyclable
NAI Erinaceous	<i>No comment recorded in response to this question</i>
RPS Planning	<i>No comment recorded in response to this question</i>
Blackpool Equalities Forum	We found that there had generally been a good response to recycling initiatives in Blackpool, and that a commitment to reducing waste should be incorporated in local plans. Blackpool is home to many businesses in the Leisure and Tourism sector (pubs, hotels, shops). We do not appear to be doing enough to encourage these businesses to recycle. Waste is collected in single bags/containers and not sorted for recycling. Business owners can opt to pay a contractor to collect recyclables, but this is at their own (additional) expense. As a result, there is no incentive for businesses to recycle; ideally we would like to see commercial waste brought up to the same standards as domestic. We considered types of waste that are more common in a tourist area: Plastic bags (shops), glass bottles (hotels and bars), leaflets and brochures. Issues surrounding additional waste during the holiday season, due to visitors.
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	<i>No comment recorded in response to this question</i>
Heswall Society	<i>No comment recorded in response to this question</i>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	There needs to be a clear focus on driving waste minimisation up the hierarchy. Care should be taken not to identify types of treatment facility that might slow or prevent this process.
RSPB	<i>No comment recorded in response to this question</i>
Cumbria County Council	<i>No comment recorded in response to this question</i>
Individual	No Comment
Local Agenda 21 Waste Group	<ul style="list-style-type: none"> <li>• What does the spatial strategy mean in terms of distance and facilities?</li> <li>• The RDA and the RA could get their heads stuck into recycling and waste facilities, especially for TVs, plastics and fridges. Proximity and precautionary principles for recycling should also be defined clearly including distance and intentions. Don't all electrical goods contain dangerous metals and chemicals?</li> <li>• People have to be educated in what types of plastics mean, once people then understand what the problems for recycling is with plastics they will respond accordingly.</li> </ul>

Organisation:	2e. Waste.
	<ul style="list-style-type: none"> <li>• Who is going to pay for it and how many waste transfer stations are needed? What incentives are the gov't giving to companies, what government fiscal policy is in place?</li> <li>• We need key recycling centres; that's why we missed EU recycling targets, ie by derogating time and again.</li> <li>• We should be encouraging companies to use recycled products such as plastics etc thus creating jobs in the North West and reducing CO2 emissions through reducing shipping to and from Eastern Countries. We need government incentives then we start to succeed.</li> <li>• New waste processing plants must be away from built up housing areas and adjacent to motorways or dual carriageways.</li> <li>• The main thing I am trying to emphasise is the lack of education of the public at large</li> <li>• The nimbyism attitude of some communities has to be addressed.</li> <li>• Local Authorities should be very careful how they negotiate waste contracts with land fill operators as punitive charges can arise.</li> <li>• Can this consultation act as an education working tool when it comes to best practices in place? For example: <ul style="list-style-type: none"> <li>○ Recycling and separating of co-mingled waste Warrington is starting a programme with a second bin for some types of waste for recycling but have missed the point of separation within the household</li> <li>○ Anaerobic digestion</li> <li>○ Separate food collections</li> <li>○ The use of land fill trading allowances / schemes</li> <li>○ Last resort incineration as to land filling.</li> <li>○ How much compost can the economy sustain and quality of compost needs assessing.</li> </ul> </li> <li>• We also need to consider separate collections for putrid waste collection (household food and pet waste) and possible clinical and surgical waste from households</li> <li>• To avoid punitive charges and potential conflicts of interest Local Authorities should be encouraged to privatise the whole of the waste management and disposal system.</li> </ul>
Advantage West Midlands	<i>No comment recorded in response to this question</i>
Environment Agency	<p>The Environment Agency will, through the RTAB, provide comments and data to assist the Assembly with preliminary work around identifying broad locations for nationally and regionally significant waste management facilities. To date we have provided our joint comments on the outputs of the initial piece of work on waste management facilities, outlining our concerns with it. In view of the concerns raised we strongly urge that care be exercised when using this to inform the partial review. Similarly it should be noted that RTAB intends to ask the Regional Assembly to endorse only specified items of research</p>

<b>Organisation:</b>	<b>2e. Waste.</b>
	when undertaking this element of the Partial review. We would therefore welcome the opportunity to work with you and other RTAB members to ensure this element of the partial review (and any necessary additional technical evidence) is progressed as early as possible, utilising robust and up to date evidence and data.
Defend Lytham	<i>No comment recorded in response to this question</i>
Preston City Council	No comment at this stage
Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	No evidence has been provided for the need for a Regional potentially National scale waste facility in the North West Region. The very large capacity and inflexibility of the processes would demand a constant and continuous supply of waste materials to ensure efficient and economic working. This would lock into one site a centralised system tending to work against waste minimisation and re-use which are both higher in the Waste Hierarchy. Consequently any successful waste reduction in the local area would result in an increase in the implementation of waste from further a field. The managing of waste as near as possible to its place of production to minimise the environmental impact of transporting waste advocated by the Proximity Principle would be contravened.
Knutsford Town Council	<i>No comment recorded in response to this question</i>
<a href="#">Crewe and Nantwich Council</a>	No comment
Forestry Commission	<i>No comment recorded in response to this question</i>
Peel Holdings (Management) Ltd	No comment.
North West Environment Link	There needs to be a clear focus on driving waste minimisation up the hierarchy and care should be taken not to identify types of treatment facility which might slow or prevent that process.
University of Cumbria	The inclusion of a stated position on the storage of nuclear waste (whether above ground as currently at Sellafield, or in a new underground storage facility) within the region should be considered given that, potentially, new nuclear power stations could be on line as early as 2017 (well within the timescale of the RSS).

<b>Organisation:</b>	<b>2e. Waste.</b>
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	<i>No comment recorded in response to this question</i>
<a href="#">Macclesfield Council</a>	<i>No comment recorded in response to this question</i>

## Question Two – 2f. Gypsies & Travellers.

### Summary Responses

7 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues

1. Clarity is needed in terms of local authority responsibilities;
2. The issue for planning is to ensure that realistic and achievable opportunities exist for Gypsies and Travellers who wish to make provision for themselves and are facilitated by the planning process;
3. Negative attitudes towards Gypsies and travellers still exist; and
4. Minorities in general require greater support than has been given or have taken up to date.

The table following includes all the verbatim comments inputted to this question

<b>Organisation:</b>	<b>2f. Gypsies &amp; Travellers.</b>
The National Trust	No specific comments.
Manchester City Council	<i>No comment recorded in response to this question</i>
Mersey Forest	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	Minorities in general require greater support than has been given to date. The development of social and regional integration can only give benefit to the region.
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	<i>No comment recorded in response to this question</i>
NAI Erinaceous	<i>No comment recorded in response to this question</i>

<b>Organisation:</b>	<b>2f. Gypsies &amp; Travellers.</b>
RPS Planning	<i>No comment recorded in response to this question</i>
Blackpool Equalities Forum	<p>We identified that:</p> <ul style="list-style-type: none"> <li>• Despite having a reasonably large settled Gypsy and Traveller community, Blackpool does not have a regular influx of Gypsies and Travellers (there are some occasional seasonal gatherings). Areas where they have camped in the past have since been made inaccessible.</li> <li>• There are general bad feelings towards Gypsies and Travellers (G+Ts) in the local community. Residents seem to take a "Not in my back yard" attitude, believing that G+Ts cause crime, damage and leave a mess. There is also the idea that they don't stay around long enough to pay council tax, which also causes resentment.</li> <li>• There is a very low take up of services by G+Ts, they don't engage with public bodies, probably because of bad or discriminatory experiences in the past.</li> <li>• Existing sites for G+Ts are located in very undesirable sites, near industrial sites, land prone to flooding and busy flyovers.</li> </ul>
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	<i>No comment recorded in response to this question</i>
Heswall Society	<i>No comment recorded in response to this question</i>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	<i>No comment recorded in response to this question</i>
RSPB	<i>No comment recorded in response to this question</i>
Cumbria County Council	<i>No comment recorded in response to this question</i>
Individual	I have been involved in this issue, on and off, for about 30 years. I have written an account of the successive legislation and its effects on both travelling people and the settled community over this period. I will send this in at the next stage of the consultation.
Local Agenda 21 Waste Group	<i>No comment recorded in response to this question</i>
Advantage West Midlands	<i>No comment recorded in response to this question</i>

<b>Organisation:</b>	<b>2f. Gypsies &amp; Travellers.</b>
Environment Agency	no comment
Defend Lytham	<i>No comment recorded in response to this question</i>
Preston City Council	It is difficult to comment on this until the outcome of the current Growth Point bidding round is known as it will have a bearing.
Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	<i>No comment recorded in response to this question</i>
KTC	<i>No comment recorded in response to this question</i>
Crewe and Nantwich Council	Vital to inform core Strategies
Forestry Commission	<i>No comment recorded in response to this question</i>
Peel Holdings (Management) Ltd	No comment.
North West Environment Link	<i>No comment recorded in response to this question</i>
University of Cumbria	The University perceives the need for clarity in terms of local authority responsibilities towards the provision of appropriate sites.
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	The issue for planning is to ensure that realistic and achievable opportunities exist for Gypsies and Travellers who wish to make provision for themselves and are facilitated by the planning process. This should enable families to live in culturally congruent accommodation in communities where they wish to be. In addition the planning process should also enable suitable RSL and affordable provision to be made for those who need it. The partial review should also address the needs of those who travel, either part of the year or full time. Current transit provision is inadequate and often inappropriate for the needs of families who travel. There will need to be consideration of the diversity needs of this part of the travelling community and appropriate solutions found. We recognise that the review will be informed by

<b>Organisation:</b>	<b>2f. Gypsies &amp; Travellers.</b>
	completed GTAAs which should provide a better evidence base. However work in other parts of the country and evidence given at a recent EiP of the Partial Review of planning for Gypsies and Travellers in the SW revealed serious inadequacies in the existing GTAAs, even those found to be robust through a benchmarking process. This will have to be addressed in the partial review and in the consultation process.
Macclesfield Council	<i>No comment recorded in response to this question</i>



## Question Two – 2g. Travelling Showpeople.

### Summary Responses

2 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues

1. There is a need for open spaces for community activity, areas that could accommodate permitted activities such as community festivals, open air concerts etc. These areas would ideally have maintained facilities (power supplies, car parking and toilet facilities)
2. Plans are vital to the development of core strategies

The table below lists all the verbatim comments submitted in response to this question

<b>Organisation:</b>	<b>2g. Travelling Showpeople.</b>
The National Trust	No specific comments.
Manchester City Council	<i>No comment recorded in response to this question</i>
Mersey Forest	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	Minorities in general require greater support than has been given to date. The development of social and regional integration can only give benefit to the region.
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	<i>No comment recorded in response to this question</i>
NAI Erinaceous	<i>No comment recorded in response to this question</i>
RPS Planning	<i>No comment recorded in response to this question</i>
Blackpool	<ul style="list-style-type: none"> <li>• We don't see Travelling Showpeople very often, probably because smaller circuses and fairs can't</li> </ul>

<b>Organisation:</b>	<b>2g. Travelling Showpeople.</b>
Equalities Forum	<p>really compete with the existing attractions in the area (Pleasure Beach etc.)</p> <ul style="list-style-type: none"> <li>We identified a need for open spaces for community activity, areas that could accommodate permitted activities such as community festivals, open air concerts etc. These areas would ideally have maintained facilities (power supplies, car parking and toilet facilities).</li> </ul>
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	<i>No comment recorded in response to this question</i>
Heswall Society	<i>No comment recorded in response to this question</i>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	<i>No comment recorded in response to this question</i>
RSPB	<i>No comment recorded in response to this question</i>
Cumbria County Council	<i>No comment recorded in response to this question</i>
Individual	No comment
Local Agenda 21 Waste Group	<i>No comment recorded in response to this question</i>
Advantage West Midlands	<i>No comment recorded in response to this question</i>
Environment Agency	no comment
Defend Lytham	<i>No comment recorded in response to this question</i>
Preston City Council	No comment at this stage
Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	<i>No comment recorded in response to this question</i>

<b>Organisation:</b>	<b>2g. Travelling Showpeople.</b>
KTC	<i>No comment recorded in response to this question</i>
Nantwich and Crewe Council	Vital to inform core Strategies
Forestry Commission	<i>No comment recorded in response to this question</i>
Peel Holdings (Management) Ltd	No comment.
North West Environment Link	<i>No comment recorded in response to this question</i>
University of Cumbria	<i>No comment recorded in response to this question</i>
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	<i>No comment recorded in response to this question</i>
Macclesfield Council	<i>No comment recorded in response to this question</i>

## Question Two – 2h. Update of Regional Parking Standards.

### Summary Responses

10 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues

1. Local Authorities and station operators should consider making additional provision for car parking at railway stations, so as to promote maximum use of the rail network;
2. It is hoped that new updated standards will help local planners reach constructive, innovative and environmentally sympathetic solutions;
3. Cumbria does not have the public transport infrastructure of the city regions. Therefore it requires a less restrictive car parking standard;
4. The needs of disabled drivers need consideration; and
5. Parking needs to be considered within wider transport issues

These summary key issues have been drawn from the verbatim comments listed below;

<b>Organisation:</b>	<b>2h. Update of Regional Parking Standards.</b>
The National Trust	These cannot be considered in isolation of other matters relating to transportation, including the investments to be made in public transport and provision for cyclists and pedestrians, and the potential for a 'charging zone' around Greater Manchester.
Manchester City Council	<i>No comment recorded in response to this question</i>
Mersey Forest	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	Given the increase in vehicle usage in all areas and the unsuitability of most built up areas to cope it is essential for a pro-active stance to be adopted with the review and redevelopment of a Regional Parking Standard. By incorporating seasonal fluctuations within the Strategic Master Plan it will be possible to focus on traffic management as an integral part of the planning process as

<b>Organisation:</b>	<b>2h. Update of Regional Parking Standards.</b>
	opposed to the more traditional add-on approach.
<a href="#">Individual</a>	NW TAR notes that national government policy has pre-empted the work the North West has been carrying out on regional parking standards and is unclear how this will now be taken forward. A statement in the final version of the Project Plan for the Partial Review would be appreciated. Meanwhile, we would re-iterate our disappointment that the work which was conducted in this region failed to get to grips properly with the issue of parking at railway stations and did not include an investigation of park & ride or an attempt to produce recommended standards for park & ride sites. Best practices from other regions should be considered.
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	Parking in Trafford is the number 2 issue after transport generally which the public want discussed but never is
NAI Erinaceous	<i>No comment recorded in response to this question</i>
RPS Planning	<i>No comment recorded in response to this question</i>
Blackpool Equalities Forum	<p>The forum was not aware that there were any existing standards. We thought that these would be most helpful especially around parking for disabled people. We feel that Regional Standards should:</p> <ul style="list-style-type: none"> <li>• Set a minimum requirement or an acceptable level for parking and encourage local authorities to go above and beyond this.</li> <li>• Consider the needs of disabled residents, when considering permit holder residential parking – possibly allocating spaces near to the houses of disabled residents.</li> <li>• New roads: ensuring that they are wide enough so as to discourage parking on pavements as mentioned in 2c.</li> </ul>
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	<i>No comment recorded in response to this question</i>
Heswall Society	<i>No comment recorded in response to this question</i>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	<i>No comment recorded in response to this question</i>

<b>Organisation:</b>	<b>2h. Update of Regional Parking Standards.</b>
RSPB	<i>No comment recorded in response to this question</i>
Cumbria County Council	<i>No comment recorded in response to this question</i>
Individual	No comment
Local Agenda 21 Waste Group	<i>No comment recorded in response to this question</i>
Advantage West Midlands	<i>No comment recorded in response to this question</i>
Environment Agency	no comment
Defend Lytham	<i>No comment recorded in response to this question</i>
Preston City Council	No comment at this stage
Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	Panel Report. Recommendation R7.7 stated 'Local Authorities and station operators should consider making additional provision for car parking at railway stations, so as to promote maximum use of the trail network.'
Knutsford Town Council	Parking in our historic town centre is perceived as being at breaking point. It is hoped that new updated standards will help local planners reach constructive, innovative and environmentally sympathetic solutions.
<a href="#">Crewe and Nantwich Council</a>	No comment
Forestry Commission	<i>No comment recorded in response to this question</i>
Peel Holdings (Management) Ltd	No comment.
North West Environment Link	It is important to retain regional parking standards to ensure consistency and to facilitate driving modal shift – allowing local authorities to determine their own standards may lead to a loosening

Organisation:	2h. Update of Regional Parking Standards.
	of standards and therefore encouragement to make more use of the private car in the competition for perceived economic benefits.
University of Cumbria	Being a large yet dispersed county, Cumbria does not have the public transport infrastructure of the city regions. Therefore it requires a less restrictive car parking standard. The University supports the findings of the Examination in Public panel which found that the Key Service Centres should have the regional parking standard applied. Furthermore, and given the point made above about public transport, the proposed ratios for Higher Education in table 10.1 'Regional Parking Standards' are inadequate and should at least be revised back to the allocation made in PPG13.
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	<i>No comment recorded in response to this question</i>
<a href="#">Macclesfield council</a>	<i>No comment recorded in response to this question</i>

## Question Two – 2i. Key Service Centres.

### Summary Responses

6 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues

1. These should be based on functionality rather than solely on physical size and population size; and
2. They should be accessible and inclusive

The two key points have been drawn from participants comments listed below

Organisation:	2i. Key Service Centres.
The National Trust	No specific comments.
Manchester City Council	<i>No comment recorded in response to this question</i>
Mersey Forest	<i>No comment recorded in response to this question</i>
Individual	No comment at this time
Individual	
Individual	This issue was very poorly handled through the last RSS process and NW TAR welcome the opportunity to revisit it. We look forward to a much more comprehensive and holistic approach this time around.
Individual	<i>No comment recorded in response to this question</i>
individual	<i>No comment recorded in response to this question</i>
NAI Erinaceous	<i>No comment recorded in response to this question</i>
RPS Planning	<i>No comment recorded in response to this question</i>
Blackpool Equalities Forum	Our main requirement for Key Service Centres is that they are accessible and inclusive. This means that: <ul style="list-style-type: none"> <li>• There are parking facilities nearby or a park and ride facility which will ease service centre</li> </ul>



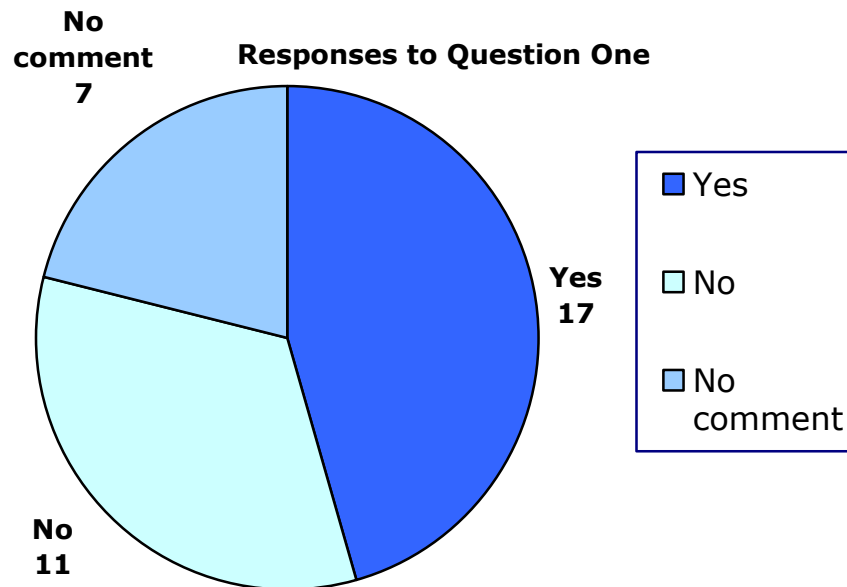
	<p>congestion and increase road safety.</p> <ul style="list-style-type: none"> <li>• There are accessible toilets and changing facilities, preferably staffed so that they are not misused.</li> <li>• Key public buildings such as council offices, bus stations, health centres and post offices are in prominent locations near to public transport links.</li> <li>• All key public buildings should be fully DDA compliant, with special attention paid to fire safety and uncluttered single level access.</li> <li>• There are more pedestrian zones and additional safe road crossings. We feel that recent redevelopment in Blackpool has failed to address these issues, and has subsequently made it more difficult for people with disabilities to access Key Service Centres.</li> </ul>
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	<i>No comment recorded in response to this question</i>
Heswall Society	<i>No comment recorded in response to this question</i>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	These should be based on functionality rather than solely on physical size and population size.
RSPB	<i>No comment recorded in response to this question</i>
Cumbria County Council	<i>No comment recorded in response to this question</i>
Individual	No comment
Local Agenda 21 Waste Group	<i>No comment recorded in response to this question</i>
Advantage West Midlands	<i>No comment recorded in response to this question</i>
Environment Agency	no comment
Defend Lytham	<i>No comment recorded in response to this question</i>
Preston City Council	It is difficult to comment on this until the outcome of the current Growth Point bidding round is known as it will have a bearing.

Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	<i>No comment recorded in response to this question</i>
Knutsford Town Council	<i>No comment recorded in response to this question</i>
Crewe and Nantwich Council	Not necessary
Forestry Commission	<i>No comment recorded in response to this question</i>
Peel Holdings (Management) Ltd	No comment.
North West Environment Link	These should be based on functionality and not just size/population.
University of Cumbria	<i>No comment recorded in response to this question</i>
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	<i>No comment recorded in response to this question</i>
Macclesfield Council	<i>No comment recorded in response to this question</i>

## Question Three – Are you happy that these methods will offer you an opportunity to get involved in the process?

### Summary Responses

There were 27 responses to question one and 8 participants made no comment, as follows;



11 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues, a response and further recommendations for the engagement process can be found in the next section;

1. There can be a delay for receiving paper copies of questionnaires;
2. The fact that two Local Authorities cannot participate fully should be addressed;
3. Workshop venues should be next to railway stations;

4. Consultations can become taking shops if too many organisations become involved;
5. When substantive policy is being addressed the 500 word limit per box should be scrapped along with the 'one sitting' requirement on the electronic questionnaire; and
6. This means that the design of questionnaires must involve local Gypsies and Travellers and their representative groups.

This summary has been drawn from the verbatim comments made by participants, see the table below

<b>Organisation:</b>	<b>3. Are you happy that these methods will offer you an opportunity to get involved in the process?</b>	<b>3a. If no, why not and what alternative methods would be more suitable for you and why?</b>
The National Trust	No	Would welcome assurance as to which specific groups and organisations will be invited to be involved in the Project and Reference Groups to be established, including consideration of an appropriate balance in the make up of those groupings.
Manchester City Council		<i>No comment recorded in response to this question</i>
Mersey Forest		<i>No comment recorded in response to this question</i>
Individual	Yes	<i>No comment recorded in response to this question</i>
Individual	No	Our objection/ complaint is not with the use of an electronic consultation medium but with: (a) Restricting the amount of feedback possible too tightly and (b) Adding to the restrictions by requiring participants to complete their responses "in one sitting". This is not a particularly onerous requirement for responses to the Draft Project Plan, but it would be for responses to later stages. It is to be earnestly hoped that this requirement is not repeated.
Individual		<i>No comment recorded in response to this question</i>
Individual		<i>No comment recorded in response to this question</i>
Individual.	Yes	<i>No comment recorded in response to this question</i>

<b>Organisation:</b>	<b>3. Are you happy that these methods will offer you an opportunity to get involved in the process?</b>	<b>3a. If no, why not and what alternative methods would be more suitable for you and why?</b>
NAI Erinaceous		<i>No comment recorded in response to this question</i>
RPS Planning	Yes	<i>No comment recorded in response to this question</i>
Blackpool Equalities Forum	Yes	<i>No comment recorded in response to this question</i>
AGMA		<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	Yes	<i>No comment recorded in response to this question</i>
Heswall Society	Yes	<i>No comment recorded in response to this question</i>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	Yes	<i>No comment recorded in response to this question</i>
RSPB		<i>No comment recorded in response to this question</i>
Cumbria County Council	No	See below comments re timelines
Individual	Yes	<i>No comment recorded in response to this question</i>
Local Agenda 21 Waste Group	No	<ul style="list-style-type: none"> <li>• I have little faith in the regional assembly (RA), with local authorities doing their own thing without co-ordination, the RSS would be better if it was sat completely within the Regional Development Agency (RDA). The RA should be closed down and all the people moved to the RDA. The Spatial Strategy has no influence over Local Authorities and what they do.</li> <li>• All partial reviews are just a way of providing breathing space and provide a further excuse for not following what was outlined in REPG 12, and for the government not to commit itself.</li> <li>• I am also sceptical of consultations as the RA has consulted us so often; we need</li> </ul>

<b>Organisation:</b>	<b>3. Are you happy that these methods will offer you an opportunity to get involved in the process?</b>	<b>3a. If no, why not and what alternative methods would be more suitable for you and why?</b>
		<p>a far greater co-ordinated approach to this work. In effect the new government rules, emanating from European Legislation will change the picture again.</p> <ul style="list-style-type: none"> <li>• Please find venues for workshops that are next major rail stations, so people do not have to get a second bus or train after getting off the train. This would also contribute to green policies.</li> <li>• Someone could produce a film showing how wind farms work in Holland, Germany, etc, showing how much energy is generated, this way and how do we compare. This could be part of the consultation presentations.</li> <li>• In addition there are too many bodies involved, with LAs and LSPs, the RA and the RDA, and that's why people won't engage as these partial reviews are just talking shops.</li> </ul>
Advantage West Midlands		<i>No comment recorded in response to this question</i>
Environment Agency	Yes	<i>No comment recorded in response to this question</i>
Defend Lytham	Yes	<i>No comment recorded in response to this question</i>
Preston City Council	Yes	<i>No comment recorded in response to this question</i>
Individual		<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	No	Those without access to the website, who require paper copies need a longer time to respond. Receiving paper copies can be delayed particularly over holiday periods, thus reducing the capsulation time.
KTC	No	The plan notes that due to Local Government Reorganisation of Cheshire in to two Unitary Authorities, they may not be able to participate fully. It should address this and determine a way to enable the two new shadow authorities to be engaged fully.
<a href="#">Crewe and Nantwich Council</a>	Yes	<i>No comment recorded in response to this question</i>

<b>Organisation:</b>	<b>3. Are you happy that these methods will offer you an opportunity to get involved in the process?</b>	<b>3a. If no, why not and what alternative methods would be more suitable for you and why?</b>
Forestry Commission	Yes	<i>No comment recorded in response to this question</i>
Peel Holdings (Management) Ltd	No	The list of Specific Consultation Bodies is the minimum set out in the Regulations. These are almost entirely public sector. Reference is made to consulting those bodies in Annex D of PPS 11 but this has proved unreliable in the past. We would request a specific consultation meeting in respects of the Peel Group interests.
North West Environment Link	No	When substantive policy is being addressed the 500 word limit per box should be scrapped in order to allow full and comprehensive responses.
University of Cumbria	Yes	<i>No comment recorded in response to this question</i>
Lancashire County Council	No	See comment below on the speed of the Partial Review
Friends, Families and Travellers	No	3a Experience from events leading up the SW partial review EiP and events at that EiP lead us to consider that there can be serious shortcomings in the consultation process and representation by Gypsies and Travellers of their views during an examination process. The outlined consultation process using consultants is welcomed but we must bring to your attention to a similar exercise carried out in the East. Whilst useful in determining preferences of Gypsy and Traveller families it neglected to gather evidence coming from those families about the overall level of need. The main arguments at the EiP will undoubtedly be about numbers of pitches of various sorts to be planned for. The GTAAs must have a reality check which effective and properly planned consultation will be able to aid. This means that the design of questionnaires must involve local Gypsies and Travellers and their representative groups. Without this such a process must be considered unsound. FFT would ask that we are included in the questionnaire design process, we have much useful experience to bring to bear.
<a href="#">Macclesfield Council</a>	Yes	<i>No comment recorded in response to this question</i>





## Question Four – Do you have any comments to make about the time line?

### Summary Responses

18 participants chose to comment on this area. A review of the participant responses shows that participants who responded raised the following key issues,

1. The Review will take place before the original draft RSS even be adopted, this will be a problem and may cause confusion;
2. To achieve consensus views especially within democratically elected organisations, a 3 month period is needed;
3. Parallel working will be needed for the development of LDP; and
4. July and August are difficult months to undertake consultations in.

This summary is based on all the comments received. These are listed in the table below;

<b>4. Do you have any comments to make about the time line?</b>	
The National Trust	In theory this mostly appears satisfactory but there are concerns about the adequacy of the evidence base that is to be established, especially given the lack of any intention on the part of NWRA at this stage to undertake its own assessment of Environmental Capacity issues. There is therefore some doubt if an adequate and acceptable evidence base will be prepared within the time scale indicated. Clearly if it is not prepared soon enough this will have implications for the other deadlines specified and/or the amount of support/buy in that the Options Report and Draft RSS receive (and by implication the extent of the necessary EiP).
Manchester City Council	It is the stated intention that the Partial Review will be completed by 2010, a timescale of 18 months. This is the same timescale set for the last review of RSS and the outcome in the words of the Panel report was that 'draft RSS is not satisfactory as it stands, and will not be so even if it is altered according to our recommendations' and that the 'deficiencies' in the strategy were often explained by the NWRA with reference to the challenging 18 month timetable. It does not seem logical therefore to set a similar timetable for another 'wide ranging' partial review. The Project Plan has been produced in advance of the GONW revisions to draft RSS being published. These are now expected in March and would reasonably have been anticipated to take on board the proposals for Growth points/Eco towns where appropriate. This would seem to negate the need to review draft RSS for this policy area, one of the

#### 4. Do you have any comments to make about the time line?

	<p>stated main drivers behind the proposal. It is understood however that this is not likely to be the case and the Growth Point / Eco Town proposals are to be 'tested' through the Partial Review process. This is extremely unhelpful and counter to Government's objective to accelerate housing delivery, as we will be bringing forward development on the ground at the same time as we are justifying this development at Examination in Public. It is now understood that the NWRA has agreed following consultation with GONW, that the timescale will be altered, not in terms of the overall timescale but to reduce the time for consultation and participation with key stakeholders. It is difficult to see how reducing the timescales for engagement will result in a more robust plan particularly given the criticisms with draft RSS and the need, identified in the Sub National Review, for more effective engagement with sub regions in the preparation of Regional Strategies. A consultation period of only 4 weeks would make it difficult for a report to be presented to the City Council given the timescales associated with the democratic process.</p>
Mersey Forest	No
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	It is absurd for the Partial Review process to begin before even the modifications for the previous RSS process have been published.
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	as long as everyone is kept informed seems sensible
NAI Erinaceous	The arranged timetable of events for the Review of the RSS, highlights that the Review would take place before the original draft RSS even be adopted. This highlights that significant policies are going to be outdated even before they are adopted.
RPS Planning	<i>No comment recorded in response to this question</i>
Blackpool Equalities Forum	It's great to be involved from the first stage, however we didn't find out about the consultation until 7th March, which left us little time to organise a meeting to discuss the plan and formulate a response. Maybe future consultation opportunities could be advertised more widely, especially amongst voluntary and community groups. Other than that, we are happy with the timeline.
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	The time line is clearly dependant upon external factors and the delivery of the additional housing within the proposed period will require high levels of buy in from the LPAs in the Region and the need for parallel working on local development documents.
Heswall Society	<i>No comment recorded in response to this question</i>

#### 4. Do you have any comments to make about the time line?

The Wildlife Trust for Lancashire, Manchester & North Merseyside	Stage One has been overly tight for smaller organisations where absence of individual staff on annual leave significantly eats into the available response time. There will be a need for close integration with the emerging single regional strategy. It would be helpful if the NWRA would indicate how it plans to accomplish this.
RSPB	The timeline for the consultation period should take account of the emerging integrated regional strategy.
Cumbria County Council	In the light of our telephone conversation yesterday about the revised timetable, and the recent emails below indicating that the proposed timetable will be shortened even further compared against the already tight deadlines you had set out for the Review of the RSS, I feel it is important that the County Council also now register our very strong concerns over this specific matter. The main concern is that we are currently undertaking a Cumbria-wide Strategic Housing Market Assessment (SHMA) in order to better inform the Review of the RSS and the next round of proposed housing numbers, as per national Government planning guidance in PPS3. In doing so, we are carrying out this work ourselves (as we had done so for the existing Housing Market Assessments and Needs Survey) through the Cumbria Housing Group as opposed to appointing external consultants. As a consequence, we are very reliant upon the Districts being able to provide the necessary resource and time to input into this important project over and above their 'day job'. Whilst we are determined to complete the SHMA exercise as required by PPS3, it is likely that we would not be able to complete the work within the original deadlines you had set for the Review of the RSS. This situation is however compounded even further by the new revised timetable, which foreshortens the whole Review exercise. I am therefore very concerned that in reducing the timescale of the Review of the RSS even further, Cumbrian Authorities may not be in a position to adequately put our case with a sufficient local evidence base to support housing growth in the County. A more realistic timetable would therefore be necessary in order for Cumbrian Authorities to properly engage in the Review of the RSS process. On a more general point, we are concerned at the very short timescales that we are given to respond to regional planning matters, and the amount of resources required by us to regularly input into regional projects. In view of the circumstances, I would therefore be grateful if you could re-assess the RSS timescales you and GONW are now proposing.
Individual	No
Local Agenda 21 Waste Group	<i>No comment recorded in response to this question</i>
Advantage West Midlands	<i>No comment recorded in response to this question</i>
Environment	Stage 2 – the Draft Project Plan and statement of public participation rightly states that, the SA/SEA needs to influence the shape and direction of the partial review. As a matter of good practice the

#### 4. Do you have any comments to make about the time line?

Agency	<p>environmental assessment of plans should influence the way the plan itself is drawn up. Whilst a plan is relatively fluid, it may be easier to discard elements which are likely to have undesirable environmental affects then it would when the plan has been completed. At that stage, an environmental assessment may be informative but is likely to be less influential. Article 4.1 of the SEA directive places a clear obligation on authorities to carry out the assessment during the preparation of the plan or programme. The scheme of the Directive and the Regulations therefore clearly envisages the parallel development of the environmental report and the draft plan, with the former impacting on the development of the latter – throughout the periods before, during and after the public consultation. The only fixed timescale for SEA is for the Scoping Report consultation (5 weeks). Otherwise the Directive specifies only that in terms of consultation with the public and consultation bodies "an early and effective opportunity within appropriate timescales" (Article 2) is given. However, the Environment Agency has recently seen a revised timetable for the RSS partial review process which significantly compresses the options stage of the process (from 6 to 3 months). Our main concerns due to the compressed timescales are that:</p> <ul style="list-style-type: none"> <li>• the quality of the assessment (especially re: cumulative/synergistic impacts) suffers;</li> <li>• the consideration of alternatives/optioneering is limited or overlooked; and</li> <li>• that the process is not truly iterative and opportunities to influence the plan are therefore lost.</li> </ul> <p>Therefore careful thought needs to be given to the detailed timing of the two processes within stage 2 of partial review development. All of the above issues are potentially compliance issues but clearly do not become so unless things are actually going awry. The compressed timescales simply increase the chances of this happening. In short, there is a danger that the fulfilment of the scheme of the Directive and the Regulations may be placed in jeopardy. But it is really a case of how well the process is managed and the quality of the work - rather than timescales per se that will determine this. The Environment Agency would welcome the opportunity to work with the Regional Assembly to ensure that these problems do not occur.</p>
Defend Lytham	<i>No comment recorded in response to this question</i>
Preston City Council	<p>June–August, and particularly the month of August are difficult months in which to obtain member endorsement. Many local authorities don't have scheduled Cabinet or Council meetings during the main holiday months of July and August when we are most likely to be aiming to seek member involvement on this timetable. Extending or putting back the timetable to include September would be helpful.</p>
Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	<i>No comment recorded in response to this question</i>
Knutsford Town	<p>It is noted that the timeline is ambitious and is being driven by government deadlines. Similarly, Parish</p>

#### 4. Do you have any comments to make about the time line?

Council	[and Town] are to be consulted. Such councillors are volunteers, unpaid, and many work full time. Given that consensus views are (quite rightly) requested, it should be noted that such a view can take three months to achieve e.g. request just misses meeting and is tabled for next. Is discussed at the next a month later. Members work on understanding and comments in isolation. Consensus view is debated and achieved at the next meeting a month later and submitted back by the clerk. Three months end to end.
<a href="#">Crewe and Nantwich Council</a>	Given the slippage on the current draft RSS, I would say this is somewhat optimistic, plus there is the fall out of LGR in Cheshire to consider.
Forestry Commission	No
Peel Holdings (Management) Ltd	No comment.
North West Environment Link	Need for close integration with emerging single regional strategy. It would be helpful if NWRA could indicate how they plan to do this.
University of Cumbria	<i>No comment recorded in response to this question</i>
Lancashire County Council	I am concerned about the speed of the Partial Review. The Partial Review has to be completed by 2011 to meet the Government's Housing Green Paper target. However the timetable requires the Partial Review to be in place by December 2010. The paper also emphasises that every opportunity will be taken to simplify and speed things up. Whilst it is important to ensure that the Partial Review proceeds without undue delay, it is important that there is sufficient time for meaningful engagement and consultation. As a statutory document its policies will have a profound influence on the Region, and as such arriving at the right answers for the right reasons within a reasonable timescale must take precedence over speed. Speeding up the process beyond what is required by the Government at a time when the NWRA Executive Board will be reorganised into the North West Strategic Partnership (NWSP) means that there could be a danger that key issues will not be fully considered by all relevant parties. The paper goes on to emphasise that the Executive Board and the subsequent NWSP will play a pivotal role in the Partial Review to ensure regional and sub-regional buy-in. It will also be required to show leadership in making potentially difficult decisions at key stages of the Partial Review. It is important therefore that the review process allows for a proper transfer of responsibilities to the NWSP.
Friends, Families	<i>No comment recorded in response to this question</i>

**4. Do you have any comments to make about the time line?**

and Travellers

Macclesfield  
Council

The time scale for the production of the revised RSS seems fairly ambitious. There is significant potential for confusion to arise (especially outside of the planning profession) from carrying out targeted public consultation on the options stage of the Partial Review before and during the intended publication date of the current draft RSS. Strategic Housing Land Availability Assessments carried out in each district will form a vital part of the evidence base for reviewing district housing figures. Although Macclesfield's SHLAA is well underway, there is some concern that not all districts will be able to complete these assessments within the timescales required by the Partial Review.

## Question Five – If you know of other research please tell us about it here and include any contact details you may have for the organisation undertaking the work.

### Summary Responses

10 participants chose to comment on this area. A review of the participant responses produced the following list of research, full verbatim, comments are shown below;

List of other research	Contact or ref, if available
Ongoing work on GI and climate change within the region. The Green Infrastructure Unit can advise on ongoing work in this area	<i>Not given</i>
South Cheshire Study	Stuart Penny at Cheshire County Council
The RSPB, Lancashire County Council Environment Directorate and the Environmental Advisory Service (Merseyside) on a "hazard map" for renewable development locations in both Lancashire & Merseyside.	Tim Youngs at the RSPB
NWEL believes that CPRE's tranquillity maps and intrusion maps would be helpful.	These are available at; <a href="http://www.cpre.org/campaigns/landscape/tranquillity/national-and-regional-tranquillity-maps/north-west">http://www.cpre.org/campaigns/landscape/tranquillity/national-and-regional-tranquillity-maps/north-west</a> and <a href="http://www.cpre.org.uk/campaigns/planning/intrusion/national-and-regional-intrusion-map-north-west">http://www.cpre.org.uk/campaigns/planning/intrusion/national-and-regional-intrusion-map-north-west</a>
<p>Considerations of other research includes:</p> <ol style="list-style-type: none"> <li>1. Identifying the cost of environmental infrastructure needed to meet the requirements of the Northwest Regional Spatial Strategy (important in assessing cost and capacity issues associated with delivering revised housing figures and eco-towns/growth points sustainably)</li> <li>2. Northwest critical infrastructure issues constraints and delivery NWDA (As above but will be specifically relevant to issues of strategic employment sites and their infrastructure capacity)</li> <li>3. North West Catchment Flood Management Plan programme</li> <li>4. North West Shoreline Management Programme</li> <li>5. Economic implications of flood risk management associated with climate change in the North</li> </ol>	All from the Environment Agency

List of other research	Contact or ref, if available
West of England	
For renewable energy contact the Renewable Energy Foundation. This organization of scientists and engineers provide information on all aspects of renewable energy.	Renewable Energy Foundation, 14, Buckingham Street, London WC2N 6DF tel. 020 7930 3636 email press@ref.org.co
The Blackpool Homelessness Strategy and the Blackpool Strategic Housing Market Assessment,	Homelessness – denise.cole@blackpool.gov.uk Housing Market Assessment - gareth.fort@blackpool.gov.uk
Full cognisance should be taken of the RSS partial review process undertaken in the SW, E and SE - arguments advanced there about Gypsy and Traveller provision will impact on the NW deliberations.	<i>Not given</i>
Apart from GMPTE it doesn't seem to me there is much information AGMA and local authority wise about social transport	<i>Not given</i>
Cumbria County are currently undertaking a Cumbria-wide Strategic Housing Market Assessment (SHMA) in order to better inform the Review of the RSS and the next round of proposed housing numbers, as per national Government planning guidance in PPS3. In doing so, we are carrying out this work ourselves (as we had done so for the existing Housing Market Assessments and Needs Survey) through the Cumbria Housing Group.	<i>Not given</i>
Lee Dudley is FC lead on Growth agenda and GI Peter Fox is regional Woodfuel lead for FC Cumbria Woodlands have recently undertaken some feasibility work for Cumbria Vision There are also several regional Woodfuel documents – available from Helen Sweeney in GONW	lee.dudley@forestry.gsi.gov.uk peter.fox@forestry.gsi.gov.uk neville@cumbriawoodlands.co.uk helen.sweeney@gonw.gsi.gov.uk

The verbatim comments for question 5 included;

Organisation:	5. If you know of other research please tell us about it here and include any contact details you may have for the organisation undertaking the work.
The National Trust	No specific comments
Manchester City	<i>No comment recorded in response to this question</i>



<b>Organisation:</b>	<b>5. If you know of other research please tell us about it here and include any contact details you may have for the organisation undertaking the work.</b>
Council	
Mersey Forest	P.17 - should also take into account ongoing work on GI and climate change within the region. The Green Infrastructure Unit can advise on ongoing work in this area
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual.</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	Apart from GMPTe it doesn't seem to me there is much information AGMA and lcal authrity wise about social transport
NAI Erinaceous	<i>No comment recorded in response to this question</i>
RPS Planning	South Cheshire Study - Stuart Penny at Cheshire County Council
Blackpool Equalities Forum	We are aware of some work undertaken by Blackpool Council which may be helpful, namely the Homelessness Strategy (denise.cole@blackpool.gov.uk) and the Strategic Housing Market Assessment (gareth.fort@blackpool.gov.uk)
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	<i>No comment recorded in response to this question</i>
Heswall Society	<i>No comment recorded in response to this question</i>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	We are working with the RSPB, Lancashire County Council Environment Directorate and the Environmental Advisory Service (Merseyside) on a "hazard map" for renewable development locations in both Lancashire & Merseyside. The RSPB is the lead organisation. The contact there is Tim Youngs.
RSPB	<i>No comment recorded in response to this question</i>
Cumbria County Council	See comment above re the work Cumbria are doing
Individual	For renewable energy contact the Renewable Energy Foundation. This organization of scientists and engineers provide information on all aspects of renewable energy. Their address is 14, Buckingham

<b>Organisation:</b>	<b>5. If you know of other research please tell us about it here and include any contact details you may have for the organisation undertaking the work.</b>
	Street, London WC2N 6DF tel. 020 7930 3636 email press@ref.org.co
Local Agenda 21 Waste Group	<i>No comment recorded in response to this question</i>
Advantage West Midlands	<i>No comment recorded in response to this question</i>
Environment Agency	<p>Considerations of other research includes:</p> <ol style="list-style-type: none"> <li>1. Identifying the cost of environmental infrastructure needed to meet the requirements of the Northwest Regional Spatial Strategy –EA (important in assessing cost and capacity issues associated with delivering revised housing figures and eco-towns/growth points sustainably)</li> <li>2. Northwest critical infrastructure issues constraints and delivery NWDA (As above but will be specifically relevant to issues of strategic employment sites and their infrastructure capacity)</li> <li>3. North West Catchment Flood Management Plan programme – EA</li> <li>4. North West Shoreline Management Programme – EA in association with lead local authorities</li> <li>5. Economic implications of flood risk management associated with climate change in the North West of England – EA on behalf of the NWDA (points 3-5 will provide additional or updated information necessary to feed into the required revision of the Regional Flood Risk Appraisal work). The NWDA are also currently commissioning a report entitled Environmental Considerations in Achieving Sustainable Economic Growth which will look at potential environmental capacity issues which arise from economic growth and which need addressing and to deliver sustainable growth. This study will be of benefit as a key baseline piece of research as it will bring together outputs of a number of other key studies being developed by key regional stakeholders.</li> </ol>
Defend Lytham	<i>No comment recorded in response to this question</i>
Preston City Council	N/A
Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	<i>No comment recorded in response to this question</i>
Knutsford Town Council	<i>No comment recorded in response to this question</i>
<a href="#">Crewe and</a>	None

Organisation:	5. If you know of other research please tell us about it here and include any contact details you may have for the organisation undertaking the work.
<a href="#">Nantwich Council</a>	
Forestry Commission	Lee Dudley is FC lead on Growth agenda and GI – lee.dudley@forestry.gsi.gov.uk Peter Fox is regional Woodfuel lead for FC – peter.fox@forestry.gsi.gov.uk Cumbria woodlands have recently undertaken some feasibility work for Cumbria Vision – contact neville@cumbriawoodlands.co.uk There are also several regional Woodfuel documents – available from Helen Sweeney in GONW – helen.sweeney@gonw.gsi.gov.uk
Peel Holdings (Management) Ltd	No comment.
North West Environment Link	NWEL believes that CPRE’s tranquillity maps and intrusion maps would be helpful. These are available at; <a href="http://www.cpre.org/campaigns/landscape/tranquility/national-and-regional-tranquility-maps/north-west">http://www.cpre.org/campaigns/landscape/tranquility/national-and-regional-tranquility-maps/north-west</a> and <a href="http://www.cpre.org.uk/campaigns/planning/intrusion/national-and-regional-intrusion-map-north-west">http://www.cpre.org.uk/campaigns/planning/intrusion/national-and-regional-intrusion-map-north-west</a>
University of Cumbria	<i>No comment recorded in response to this question</i>
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	Full cognisance should be taken of the RSS partial review process undertaken in the Sw, E and SE - arguments advanced there about Gypsy and Traveller provision will impact on the NW deliberations.
<a href="#">Macclesfield council</a>	<i>No comment recorded in response to this question</i>

## Question Six – Are there any other comments that you want to make about the Draft Project Plan?

### Summary Responses

11 participants chose to comment on this area. A review of the participant responses produced the following list of research, full verbatim, comments are shown below;

1. Working across regional boundaries is important
2. This review and the strategy could be used to identify areas of deprivation and plans for reliving it
3. The partial review could also consider;
  - Reintroducing the 'Shankling Plan' in Bolton
  - Transport investment priorities
  - Regional Flood Risk Appraisal
  - Vast numbers of empty housing

As the verbatim comment below show, some other comments on the engagement plan were also made in response to question 6. For more information on these please see the next section.

Organisation:	6. Are there any other comments that you want to make about the Draft Project Plan?
The National Trust	No
Manchester City Council	<i>No comment recorded in response to this question</i>
Mersey Forest	<i>No comment recorded in response to this question</i>

<b>Organisation:</b>	<b>6. Are there any other comments that you want to make about the Draft Project Plan?</b>
<a href="#">Individual</a>	Not at this time
<a href="#">Individual</a>	The Project Plan should include a list of the key stakeholders and this list should encompass a fair representation of NGO environmental and community bodies. These should continue to be recognised and treated as key stakeholders whatever subsequently happens. The Project Plan should also incorporate a fall-back procedure to be followed in the event of it not becoming possible to proceed with the agreed Project Plan. The Project Plan for the previous RSS process was effectively made redundant shortly after it was adopted with the closing down of the Key Priority Groups and the Action for Sustainability bodies. No formal process which could be understood by wider stakeholders was put in their place and these stakeholders who had been previously engaged felt disenfranchised.
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">Individual</a>	<i>No comment recorded in response to this question</i>
<a href="#">individual</a>	Good to be involved. I bet a lot of organisations aren't
NAI Erinaceous	<i>No comment recorded in response to this question</i>
RPS Planning	No
Blackpool Equalities Forum	Some of the wording used was very confusing and could discourage people from responding. We felt that the issues could be explained in a clearer way.
AGMA	<i>No comment recorded in response to this question</i>
Satnam Planning Services Ltd	Areas of the Region, such as north Warrington, suffer from levels of deprivation which can be relieved by further development within and adjacent to those areas; the Strategy should seek to identify such areas and issues and set out a strategic way of reducing such problems.
Heswall Society	<i>No comment recorded in response to this question</i>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	<i>No comment recorded in response to this question</i>
RSPB	<i>No comment recorded in response to this question</i>
Cumbria County Council	<i>No comment recorded in response to this question</i>
Individual	I would like to ensure that any estimates of future household need takes into account the vast number of

Organisation:	6. Are there any other comments that you want to make about the Draft Project Plan?
	currently empty housing.
Local Agenda 21 Waste Group	<i>No comment recorded in response to this question</i>
Advantage West Midlands	The issue of cross-boundary working, encompassing outward-facing infrastructure links, housing markets and economy interrelationships, will be of significance to the relationship between the two regions. I am pleased to note that the list of 'Specific Consultation Bodies' set out on page 21 includes regional development agencies in adjacent regional and look forward to Advantage West Midlands being consulted further during the partial review.
Environment Agency	Please note that the Environment Agency would expect that the Regional Flood Risk Appraisal be revisited as part of the partial review of RSS. We would welcome the opportunity to work with the Regional Assembly to assist with this process.
Defend Lytham	<i>No comment recorded in response to this question</i>
Preston City Council	These comments are also made on behalf of Chorley and South Ribble Councils, who are both engaged with Preston City Council, in preparing a joint Core Strategy.
Individual	In Bolton it would be possible to enclose the present railway lines to enable trains to access the station, and then fill in the area with inert refuse to form a level surface to be used as a bus / rail interchange. This suggestion was originally proposed in the "Shankling Plan", which was commissioned by the Bolton Corporation (pre 1974). They asked a consultant called Graham Shankling to devise a plan for the future of the Town. This vast area could all be levelled out and this could all be enclosed in with steel work with concrete sections to make a level surface.
Upton Greenbelt Preservation Group	<i>No comment recorded in response to this question</i>
Knutsford Town Council	<i>No comment recorded in response to this question</i>
<a href="#">Crewe and Nantwich Council</a>	No
Forestry Commission	No
Peel Holdings (Management)	We note from page 8 of the draft that a review of regional transport investment priorities will not take place as part of the Partial Review. Although this is underlined, the text goes on to acknowledge that, if

Organisation:	6. Are there any other comments that you want to make about the Draft Project Plan?
Ltd	such a review takes place as a result of the next RFA exercise, the Partial Review will need to reflect this. In addition, work is being undertaken by the NWRA to update the Prioritisation Methodology. In these circumstances, we think it would be prudent to review the transport investment priorities in the Partial Review to recognise, for example, the conclusions of Eddington regarding the importance of access to ports and airports.
North West Environment Link	A list of 'wider stakeholders' consulted would be helpful. It is very important that the Project Plan, once agreed, should be adhered to. However, if changes are needed, consultees should be consulted in good time and given a reasonable time to respond
University of Cumbria	<i>No comment recorded in response to this question</i>
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	<i>No comment recorded in response to this question</i>
Macclesfield Council	<i>No comment recorded in response to this question</i>

## Question Seven – Are there any other comments that you would wish to make about the Partial Review of the North West Plan?

7 participants chose to make further comments. A review of the participant responses shows that participants who responded raised the following key issues

1. The Partial Review will need to deal with housing numbers for the two new UAs in Cheshire
2. We must encourage ash generated by Power Stations to be used by industry, for example for making bricks
3. we want the Plan to reflect that 'one size does not fit all'
4. Although this is only a Partial Review, it must still take a holistic approach, particularly in relation to climate change and sustainable development,

All comments received for this question are listed in the table below

Organisation:	2a. Are there any other comments that you would wish to make about the Partial Review of the North West Plan?
The National Trust	No
Manchester City Council	<i>No comment recorded in response to this question</i>
Mersey Forest	<i>No comment recorded in response to this question</i>
Individual	Not at this time
Individual	Although this is only a Partial Review, it must still take a holistic approach, particularly in relation to climate change and sustainable development, and accord with the North West Climate Change Action Plan and the Action for Sustainability Framework as required by the RSS Panel Report.
Individual	<i>No comment recorded in response to this question</i>
Individual	<i>No comment recorded in response to this question</i>
Individual.	<i>No comment recorded in response to this question</i>



NAI Erinaceous	It is concluded that the RSS PR, overall should represent a positive development framework from which to move forward as a key strategic driver for the region. Notwithstanding this it is hoped that the comments set out will be fully considered and incorporated within the final version
RPS Planning	It will need to deal with housing numbers for the two new UAs in Cheshire.
Blackpool Equalities Forum	We found that the consultation questions were very inclusive and that it is an excellent opportunity to be consulted. We would like to hear your feedback and receive communication on further developments. There are clear differences between Blackpool and other parts of the North West; we want the Plan to reflect that 'one size does not fit all'.
AGMA	See letter
Satnam Planning Services Ltd	<i>No comment recorded in response to this question</i>
Heswall Society	<i>No comment recorded in response to this question</i>
The Wildlife Trust for Lancashire, Manchester & North Merseyside	<i>No comment recorded in response to this question</i>
RSPB	<i>No comment recorded in response to this question</i>
Cumbria County Council	<i>No comment recorded in response to this question</i>
Individual	No Comment
Local Agenda 21 Waste Group	ASH LAGOONS • Fiddlers Ferry Power Station as it is adjacent to the flood plane, keeping in mind the millions of tonnes of ash contained in the ash lagoons, if we have severe flooding will the ash from these lagoons or ash slides clog up the Mersey or affect surrounding housing areas. We must encourage this ash to be used by industry, for example for making bricks.
Advantage West Midlands	<i>No comment recorded in response to this question</i>
Environment Agency	<i>No comment recorded in response to this question</i>
Defend Lytham	<i>No comment recorded in response to this question</i>
Preston City Council	No

Individual	<i>No comment recorded in response to this question</i>
Upton Greenbelt Preservation Group	<i>No comment recorded in response to this question</i>
Knutsford Town Council	<i>No comment recorded in response to this question</i>
Crewe and Nantwich Council	It shows the danger of pressing ahead with the original draft RSS before the government policy context was in place.
Forestry Commission	<i>No comment recorded in response to this question</i>
Peel Holdings (Management) Ltd	No comment.
North West Environment Link	<i>No comment recorded in response to this question</i>
University of Cumbria	<i>No comment recorded in response to this question</i>
Lancashire County Council	<i>No comment recorded in response to this question</i>
Friends, Families and Travellers	<i>No comment recorded in response to this question</i>
Macclesfield Council	<i>No comment recorded in response to this question</i>

# Participant comments and the consultation

Within the consultation on the Draft Project Plan we received several comments about the engagement process.

Four questions within the questionnaire sought out this response, these were;

- Are you happy that these methods will offer you an opportunity to get involved in the process? If no, why not and what alternative methods would be more suitable for you and why?
- Do you have any comments to make about the time line?
- Are there any other comments that you want to make about the Draft Project Plan?
- Are there any other comments that you would wish to make about the Partial Review of the North West Plan?

The table below lists all the engagement comments together with information for clarification, a recommendation for a change or for action in the next stage or some other input.

All comments in blue are from NWRA, whilst those in black are from CAG Consultants who are supporting the facilitation of the engagement programme.

Participants comment	Information or proposed action in the next round
<b>Are you happy that these methods will offer you an opportunity to get involved in the process? If no, why not and what alternative methods would be more suitable for you and why?</b>	
Those without access to the website, who require paper copies need a longer time to respond. Receiving paper copies can be delayed particularly over holiday periods, thus reducing the capsulation time.	CAG Consultant will send paper copies to all those we know need them. We will encourage people to let us know in advance if they need paper copies in the newsletter.
The plan notes that due to Local Government Reorganisation of Cheshire in to two Unitary Authorities, they may not be able to participate fully. It should address this and determine a way to enable the two new shadow authorities to be engaged fully.	For discussion with NWRA
I have little faith in the regional assembly (RA), with local authorities doing their own thing without co-ordination, the RSS would be better if it was sat completely within the Regional Development Agency (RDA). The RA should be closed down and all the people moved to the RDA. The Spatial Strategy has no influence over Local Authorities and what they do.	Information needed here.
All partial reviews are just a way of providing breathing space and provide a further excuse for not following what was	For discussion with NWRA – we need to say something positive

Participants comment	Information or proposed action in the next round
outlined in REPG 12, and for the government not to commit itself.	about the results.
I am also sceptical of consultations as the RA has consulted us so often; we need a far greater co-ordinated approach to this work. In effect the new government rules, emanating from European Legislation will change the picture again.	For discussion with NWRA
Please find venues for workshops that are next major rail stations, so people do not have to get a second bus or train after getting off the train. This would also contribute to green policies.	CAG Consultants will ensure workshops are near transport links where possible.
Someone could produce a film showing how wind farms work in Holland, Germany, etc, showing how much energy is generated, this way and how do we compare. This could be part of the consultation presentations.	CAG Consultants and NWRA will not be able to include such a presentation as it might be seen as guiding people and not consulting them.
In addition there are too many bodies involved, with LAs and LSPs, the RA and the RDA, and that's why people won't engage as these partial reviews are just talking shops.	Facilitators to ensure that all participants are given equal opportunity to contribute. CAG Consultants will continue to encourage and support participation from individuals and other types of organisations.
The list of Specific Consultation Bodies is the minimum set out in the Regulations. These are almost entirely public sector. Reference is made to consulting those bodies in Annex D of PPS 11 but this has proved unreliable in the past.	CAG Consultants will continue to encourage and support participation from individuals and other types of organisations, including those set out in PPS 11 Annex D.
We would request a specific consultation meeting in respects of the Peel Group interests.	Key stakeholder dialogue meetings may be required at later stages of the Partial Review.
When substantive policy is being addressed the 500 word limit per box should be scrapped in order to allow full and comprehensive responses.	The 500 word limit is the equivalent of approximately one page of A4 typed. CAG Consultants will monitor whether this needs expanding at the next stage.
Experience from events leading up the SW partial review EIP and events at that EIP lead us to consider that there can be serious shortcomings in the consultation process and representation by Gypsies and Travellers of their views during an examination process. The outlined consultation process using consultants is welcomed but we must bring to your attention to a similar exercise carried out in the East. Whilst useful in determining preferences of Gypsy and Traveller families it neglected to gather evidence coming from those	CAG Consultants recognise that local Gypsies and Travellers need to be involved in designing questionnaires and intend to do so.  In addition to designing questionnaires CAG Consultants will seek involve local Gypsies and

Participants comment	Information or proposed action in the next round
<p>families about the overall level of need. The main arguments at the EiP will undoubtedly be about numbers of pitches of various sorts to be planned for. The GTAA's must have a reality check which effective and properly planned consultation will be able to aid. This means that the design of questionnaires must involve local Gypsies and Travellers and their representative groups. Without this such a process must be considered unsound. FFT would ask that we are included in the questionnaire design process, we have much useful experience to bring to bear.</p>	<p>Travellers working as peer interviewers to seek out responses to key questions in the next phase.</p>
<p>Our objection/ complaint is not with the use of an electronic consultation medium but with: (a) Restricting the amount of feedback possible too tightly and</p>	<p>As above. The 500 word limit is the equivalent of approximately one page of A4 typed. CAG Consultants will monitor whether this needs expanding at the next stage.</p>
<p>(b) Adding to the restrictions by requiring participants to complete their responses "in one sitting". This is not a particularly onerous requirement for responses to the Draft Project Plan, but it would be for responses to later stages. It is to be earnestly hoped that this requirement is not repeated.</p>	<p>In the next stage people completing the questionnaire will be able to save a partially completed questionnaire and come back to it to complete it at a later time.</p>
<p>Would welcome assurance as to which specific groups and organisations will be invited to be involved in the Project and Reference Groups to be established, including consideration of an appropriate balance in the make up of those groupings.</p>	<p>For discussion with NWRA</p>
<p><b>4. Do you have any comments to make about the time line?</b></p>	
<p>A number of participants raised concerns about tight time lines in terms of being able to timetable in sending out and getting comments within democratic structures</p>	<p>The revised timetable has made this work more challenging. CAG Consultants will send out newsletters to all those on the NWRA consultation database emphasising the need to get the Review on to agendas asap.</p>
<p>June–August, and particularly the month of August are difficult months in which to obtain member endorsement. Many local authorities don't have scheduled Cabinet or Council meetings during the main holiday months of July and August when we are most likely to be aiming to seek member involvement on this timetable. Extending or putting back the timetable to include September would be helpful.</p>	<p>The timing has been moved to June, which CAG Consultants hope will improve participation</p>
<p>It is the stated intention that the Partial Review will be completed by 2010, a timescale of 18 months. This is the same timescale set for the last review of RSS and the outcome in the words of the Panel report was that 'draft RSS is not satisfactory as it stands, and will not be so even if it is altered according to our recommendations' and that the 'deficiencies' in the strategy were often explained by the NWRA with</p>	<p>For discussion with NWRA</p>

Participants comment	Information or proposed action in the next round
<p>reference to the challenging 18 month timetable. It does not seem logical therefore to set a similar timetable for another 'wide ranging' partial review. The Project Plan has been produced in advance of the GONW revisions to draft RSS being published. These are now expected in March and would reasonably have been anticipated to take on board the proposals for Growth points/Eco towns where appropriate.</p>	
<p>This [the RSS being published in March] would seem to negate the need to review draft RSS for this policy area, one of the stated main drivers behind the proposal. It is understood however that this is not likely to be the case and the Growth Point / Eco Town proposals are to be 'tested' through the Partial Review process. This is extremely unhelpful and counter to Government's objective to accelerate housing delivery, as we will be bringing forward development on the ground at the same time as we are justifying this development at Examination in Public.</p>	<p>For discussion with NWRA</p>
<p>It is now understood that the NWRA has agreed following consultation with GONW, that the timescale will be altered, not in terms of the overall timescale but to reduce the time for consultation and participation with key stakeholders. It is difficult to see how reducing the timescales for engagement will result in a more robust plan particularly given the criticisms with draft RSS and the need, identified in the Sub National Review, for more effective engagement with sub regions in the preparation of Regional Strategies.</p>	<p>For discussion with NWRA</p>
<p>I am concerned about the speed of the Partial Review. The Partial Review has to be completed by 2011 to meet the Government's Housing Green Paper target. However the timetable requires the Partial Review to be in place by December 2010. The paper also emphasises that every opportunity will be taken to simplify and speed things up. Whilst it is important to ensure that the Partial Review proceeds without undue delay, it is important that there is sufficient time for meaningful engagement and consultation. As a statutory document its policies will have a profound influence on the Region, and as such arriving at the right answers for the right reasons within a reasonable timescale must take precedence over speed. Speeding up the process beyond what is required by the Government at a time when the NWRA Executive Board will be reorganised into the North West Strategic Partnership (NWSP) means that there could be a danger that key issues will not be fully considered by all relevant parties. The paper goes on to emphasise that the Executive Board and the subsequent NWSP will play a pivotal role in the Partial Review to ensure regional and sub-regional buy-in. It will also be required to show leadership in making potentially difficult decisions at key stages of the Partial Review. It is important therefore that the review process allows for a proper transfer of responsibilities to the NWSP.</p>	<p>For discussion with NWRA</p>

Participants comment	Information or proposed action in the next round
Need for close integration with emerging single regional strategy. It would be helpful if NWRA could indicate how they plan to do this.	For discussion with NWRA
The timeline for the consultation period should take account of the emerging integrated regional strategy.	For discussion with NWRA
<p>Stage 2 – the Draft Project Plan and statement of public participation rightly states that, the SA/SEA needs to influence the shape and direction of the partial review. As a matter of good practice the environmental assessment of plans should influence the way the plan itself is drawn up. Whilst a plan is relatively fluid, it may be easier to discard elements which are likely to have undesirable environmental affects then it would when the plan has been completed. At that stage, an environmental assessment may be informative but is likely to be less influential. Article 4.1 of the SEA directive places a clear obligation on authorities to carry out the assessment during the preparation of the plan or programme. The scheme of the Directive and the Regulations therefore clearly envisages the parallel development of the environmental report and the draft plan, with the former impacting on the development of the latter – throughout the periods before, during and after the public consultation. The only fixed timescale for SEA is for the Scoping Report consultation (5 weeks). Otherwise the Directive specifies only that in terms of consultation with the public and consultation bodies "an early and effective opportunity within appropriate timescales" (Article 2) is given. However, the Environment Agency has recently seen a revised timetable for the RSS partial review process which significantly compresses the options stage of the process (from 6 to 3 months). Our main concerns due to the compressed timescales are that:</p> <ul style="list-style-type: none"> <li>• the quality of the assessment (especially re: cumulative/synergistic impacts) suffers;</li> <li>• the consideration of alternatives/options is limited or overlooked; and</li> <li>• that the process is not truly iterative and opportunities to influence the plan are therefore lost.</li> </ul> <p>Therefore careful thought needs to be given to the detailed timing of the two processes within stage 2 of partial review development. All of the above issues are potentially compliance issues but clearly do not become so unless things are actually going awry. The compressed timescales simply increase the chances of this happening. In short, there is a danger that the fulfilment of the scheme of the Directive and the Regulations may be placed in jeopardy. But it is really a case of how well the process is managed and the quality of the work - rather than timescales per se that will determine this. The Environment Agency would welcome the opportunity to work with the Regional Assembly to ensure that these problems do not occur.</p>	For discussion with NWRA

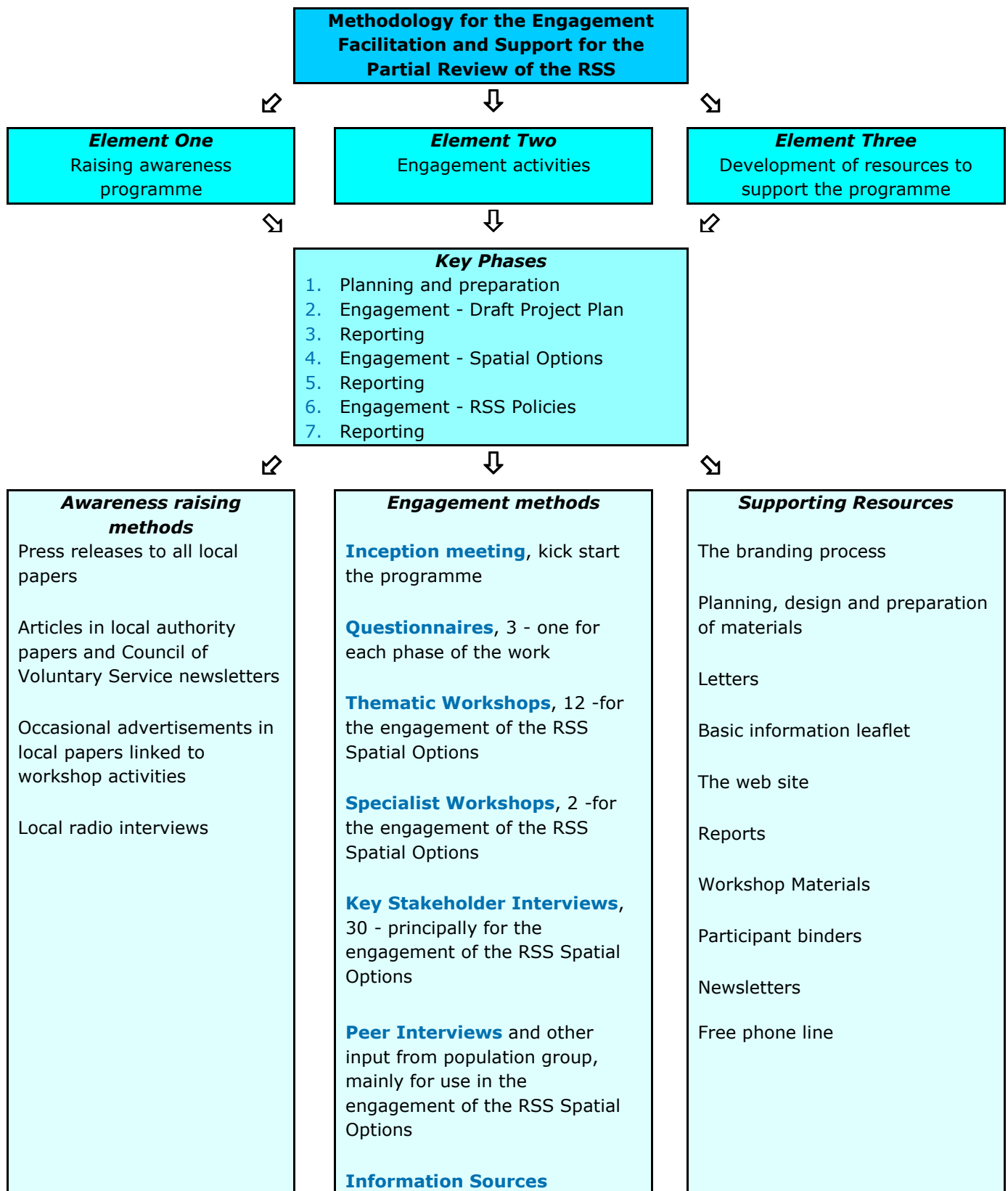
Participants comment	Information or proposed action in the next round
<p>It's great to be involved from the first stage, however we didn't find out about the consultation until 7th March, which left us little time to organise a meeting to discuss the plan and formulate a response. Maybe future consultation opportunities could be advertised more widely, especially amongst voluntary and community groups. Other than that, we are happy with the timeline.</p>	<p>CAG Consultants will continue to raise awareness of the Partial Review process through the CVS network.</p>
<p>The time scale for the production of the revised RSS seems fairly ambitious. There is significant potential for confusion to arise (especially outside of the planning profession) from carrying out targeted public consultation on the options stage of the Partial Review before and during the intended publication date of the current draft RSS. Strategic Housing Land Availability Assessments carried out in each district will form a vital part of the evidence base for reviewing district housing figures. Although Macclesfield's SHLAA is well underway, there is some concern that not all districts will be able to complete these assessments within the timescales required by the Partial Review.</p>	<p>For discussion with NWRA</p>
<p>Given the slippage on the current draft RSS, I would say this is somewhat optimistic, plus there is the fall out of LGR in Cheshire to consider.</p>	<p>For discussion with NWRA</p>
<p>It is absurd for the Partial Review process to begin before even the modifications for the previous RSS process have been published.</p>	<p>For discussion with NWRA</p>
<p>As long as everyone is kept informed seems sensible</p>	<p>CAG Consultants and the NWRA will endeavour to continue to keep participants informed.</p>
<p>In the light of our telephone conversation yesterday about the revised timetable, and the recent emails below indicating that the proposed timetable will be shortened even further compared against the already tight deadlines you had set out for the Review of the RSS, I feel it is important that the County Council also now register our very strong concerns over this specific matter. The main concern is that we are currently undertaking a Cumbria-wide Strategic Housing Market Assessment (SHMA) in order to better inform the Review of the RSS and the next round of proposed housing numbers, as per national Government planning guidance in PPS3. In doing so, we are carrying out this work ourselves (as we had done so for the existing Housing Market Assessments and Needs Survey) through the Cumbria Housing Group as opposed to appointing external consultants. As a consequence, we are very reliant upon the Districts being able to provide the necessary resource and time to input into this important project over and above their 'day job'. Whilst we are determined to complete the SHMA exercise as required by PPS3, it is likely that we would not be able to complete the work within the original deadlines you had set for the Review</p>	<p>For discussion with NWRA</p>



Participants comment	Information or proposed action in the next round
<p>of the RSS. This situation is however compounded even further by the new revised timetable, which foreshortens the whole Review exercise. I am therefore very concerned that in reducing the timescale of the Review of the RSS even further, Cumbrian Authorities may not be in a position to adequately put our case with a sufficient local evidence base to support housing growth in the County. A more realistic timetable would therefore be necessary in order for Cumbrian Authorities to properly engage in the Review of the RSS process. On a more general point, we are concerned at the very short timescales that we are given to respond to regional planning matters, and the amount of resources required by us to regularly input into regional projects. In view of the circumstances, I would therefore be grateful if you could re-assess the RSS timescales you and GONW are now proposing.</p>	
<p>In theory this mostly appears satisfactory but there are concerns about the adequacy of the evidence base that is to be established, especially given the lack of any intention on the part of NWRA at this stage to undertake its own assessment of Environmental Capacity issues. There is therefore some doubt if an adequate and acceptable evidence base will be prepared within the time scale indicated. Clearly if it is not prepared soon enough this will have implications for the other deadlines specified and/or the amount of support/buy in that the Options Report and Draft RSS receive (and by implication the extent of the necessary EiP).</p>	<p>For discussion with NWRA</p>
<p>It is noted that the timeline is ambitious and is being driven by government deadlines. Similarly, Parish [and Town] are to be consulted. Such councillors are volunteers, unpaid, and many work full time. Given that consensus views are (quite rightly) requested, it should be noted that such a view can take three months to achieve e.g. request just misses meeting and is tabled for next. Is discussed at the next a month later. Members work on understanding and comments in isolation. Consensus view is debated and achieved at the next meeting a month later and submitted back by the clerk. Three months end to end.</p>	<p>For discussion with NWRA</p>
<p><b>6. Are there any other comments that you want to make about the Draft Project Plan?</b></p>	
<p>The issue of cross-boundary working, encompassing outward-facing infrastructure links, housing markets and economy interrelationships, will be of significance to the relationship between the two regions. I am pleased to note that the list of 'Specific Consultation Bodies' set out on page 21 includes regional development agencies in adjacent regional and look forward to Advantage West Midlands being consulted further during the partial review.</p>	<p>CAG Consultants and the NWRA will endeavour to continue to keep participants informed including partners from other regions</p>
<p>A list of 'wider stakeholders' consulted would be helpful.</p>	<p>A list will be made available on the web site, although any list does not exclude others from</p>

Participants comment	Information or proposed action in the next round
	becoming involved.
It is very important that the Project Plan, once agreed, should be adhered to. However, if changes are needed, consultees should be consulted in good time and given a reasonable time to respond	CAG Consultants and NWRA will endeavour to keep to the Project Plan, once agreed. Should changes be made participants will be informed in the first instance via the web site and newsletter
Please note that the Environment Agency would expect that the Regional Flood Risk Appraisal be revisited as part of the partial review of RSS. We would welcome the opportunity to work with the Regional Assembly to assist with this process.	Key stakeholder dialogue meetings may be required at later stages of the Partial Review.
Some of the wording used was very confusing and could discourage people from responding. We felt that the issues could be explained in a clearer way.	CAG Consultants will review the current wording and try to use more accessible language in the future
The Project Plan should include a list of the key stakeholders and this list should encompass a fair representation of NGO environmental and community bodies. These should continue to be recognised and treated as key stakeholders whatever subsequently happens.	A list will be made available on the web site, although any list does not exclude others from becoming involved.
The Project Plan should also incorporate a fall-back procedure to be followed in the event of it not becoming possible to proceed with the agreed Project Plan. The Project Plan for the previous RSS process was effectively made redundant shortly after it was adopted with the closing down of the Key Priority Groups and the Action for Sustainability bodies. No formal process which could be understood by wider stakeholders was put in their place and these stakeholders who had been previously engaged felt disenfranchised.	For discussion with NWRA
Good to be involved. I bet a lot of organisations aren't	Through the awareness raising programme we are trying to involve as many organisations as wish to become involved
<b>7. Are there any other comments that you would wish to make about the Partial Review of the North West Plan?</b>	
We found that the consultation questions were very inclusive and that it is an excellent opportunity to be consulted. We would like to hear your feedback and receive communication on further developments. There are clear differences between Blackpool and other parts of the North West; we want the Plan to reflect that 'one size does not fit all'.	CAG Consultants will keep all those who have registered up to date through paper and electronic newsletters

# Appendix One: The Framework



# Appendix Two – Draft Project Plan Questionnaire

## Questions for the consultation on the Draft Project Plan and Statement of Public Participation for the North West Plan

### Introduction

This questionnaire has been made available in this format to enable you to think about or discuss your responses off line. Please return to the consultation web site to up load your final answers

Thanks

### The Questions

#### Question One – The Issues, in principle.

The Partial Review of Regional Spatial Strategy will lead to the further development of policies to support the underlying strategy. The following issues have been identified as key:

- Sub-regional Housing Market Areas;
- Revision of District Housing Figures;
- Growth Points and Eco-towns;
- Renewable Energy; and
- Waste.

In addition the Assembly and its Executive Board also agreed to take the opportunity of the Partial Review to 'tidy up' a number of policy areas covering:

- Gypsies & Travellers;
- Travelling Showpeople;
- Update of Regional Parking Standards; and
- Key Service Centres.

These issues are outlined in more detail in pages 7 to 10 of the Draft Project Plan

1. Do you agree that these are key issues for the region and this review?

Yes (go to 1a)



No (go to 1b)

1a If so why?

1b If not, why not?

**Question Two – The Issues, in particular.**

The next stage of the consultation process allows for detailed input from you in developing options for policy development. However at this stage do you want to make any initial comments about any of the issues?

*NOTE: Remember to be as clear as you can to avoid misinterpretation of your comments, think about writing in list and keeping your sentences short.*

2a Sub-regional Housing Market Areas

2b Revision of District Housing Figures

2c Growth Points and Eco-towns

2d Renewable Energy



2e Waste

2f Gypsies & Travellers

2g Travelling Showpeople

2h Update of Regional Parking Standards

2j Key Service Centres

### Question Three – The Consultation, the methods

The aim of the Partial Review process is be as open, transparent and inclusive as possible. We hope to provide the opportunity for all relevant people and organisations to get involved and to be consulted.

Pages 20 to 24 of the draft project plan outline the methods we plan to use to involve and consult with you and the timetable for this work.

3. Are you happy that these methods will offer you an opportunity to get involved in the process?

Yes                      No                      (go to 3a)



3a. If no, why not and what alternative methods would be more suitable for you and why?

#### Question Four – The Consultation, the timeline

It has been agreed with Government that the NWRA will submit a draft version of the Partial Review of the North West Plan to the Secretary of State in June 2009. The Draft Project Plan outlines the timetable for the whole Partial Review and the consultation process. The three consultation stages that will happen before submitting the draft version of Partial Review are:

- Stage One – 13<sup>th</sup> February to 26<sup>th</sup> March 2008, consultation on the Draft Project Plan and Statement of Public Participation;
- Stage Two – June to August 2008, consultation on the draft options; and
- Stage Three – November 2008 to January 2009, consultation on the interim draft policies.

4. Do you have any comments to make about the time line?

#### Question Five – Technical Information

Pages 15 to 17 of the Draft Project Plan outline the technical work that has been done so far to inform the Partial Review process.

You may know of other useful North West focused research that other organisations are currently undertaking which could further inform the process and options.

5. If you know of other research please tell us about it here and include any contact details you may have for the organisation undertaking the work.

### Question Six – Other Comments on the Draft Project Plan

6. Are there any other comments that you want to make about the Draft Project Plan?

### Question Seven – Other Comments on the Partial Review of the North West Plan

7. Are there any other comments that you would wish to make about the Partial Review of the North West Plan

8. I would prefer to keep my comments anonymous, *please tick*

Thanks you for your time and your input.



# Appendix Three – Rules of Engagement

## Rules of engagement for all stages of the on line consultation on the North West Plan

This consultation is based on the principle that no one person has all the answers and that's why we want to hear from you, other people and other organisations.

Online consultation uses new technologies to facilitate open and deliberative dialogue. Rather than merely providing information, on line consultation provides the opportunity for individuals and organisations to input into the shaping of plans and policy.

People participating the consultation will have different views and sometimes these views are opposed to each other. By participating in the consultation we can guarantee that your views will be collated with others, will be submitted to the North West Assembly and will be given consideration.

To ensure that the process works well and is equitable we will provide clear information and a framework for the discussion, as well as other ways to access information and comment on plans and policies.

## Rules for users

- **Submit and allow us to use your details within this consultation process.** It is important that we know who is contacting us so that we can ensure the process is representative and so that we can moderate the process well.
- **Each user must only submit one completed consultation questionnaire.** If the moderators (see below) find information to suggest that an individual or organisation has submitted more than one form they will contact the person via email. If contact cannot be made we will use the first submitted form.

It is important that you think about your responses and you may have to discuss them with other people in your organisation as well before submitting your form. You can download a pdf version of the form to help you think through your answers or discuss them off line.

- **Keep answers to 500 words.** We have made the boxes for your answers long enough to accommodate about 500 words. Think about how you are going to tell us about your thoughts beforehand and be as clear as possible. That way you can avoid the moderators misunderstanding what it is you want to tell us.
- **Allow us to share your comments.** All questionnaire responses will be displayed on the web site exactly as you write them (unless they are subject to moderation). Unless you tell us not to this list of comments will also include your name and the name of your organisation (if appropriate) If you want to keep your comments anonymous then make sure you click the box on the last page of the questionnaire.
- **Keep it clean and respectful.** We know that some of the issues in this consultation are ones that people have strong opinions about, but any questionnaire responses containing language or opinions that the moderators deem to be offensive will be sent back via email to the person who has submitted the form. We will request that you modify your response.

- **Respond in a timely way.** We will ensure that you know when each stage begins and ends, it will not be possible to take comments after the end date of each stage.

### What we will do

The process will be moderated by CAG Consultants, to ensure that the process runs smoothly we will:

1. Provide feedback and keep registered participants and some other stakeholders up to date with the consultation process through electronic or paper newsletters;
2. We will treat every response equally;
3. Read through submitted questionnaires to ensure they do not contain offensive language or opinions. We will return any that do and request a modification;
4. We will up load verbatim responses, after the review described at point 3. These responses can be viewed by any register user;
5. We will ensure that all comments are collated and analysed and submitted to the North West Regional Assembly;
6. We will respect your contact details and not use them for any purpose other than those you have agreed to; and
7. Evaluate the process to make improvements next time.