



PARTIAL REVIEW OF REGIONAL
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A1.1
June – July 2008

CONSULTATION REPOSSES

North West Regional Assembly

PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A1.1

A consultation report from

CAG Consultants

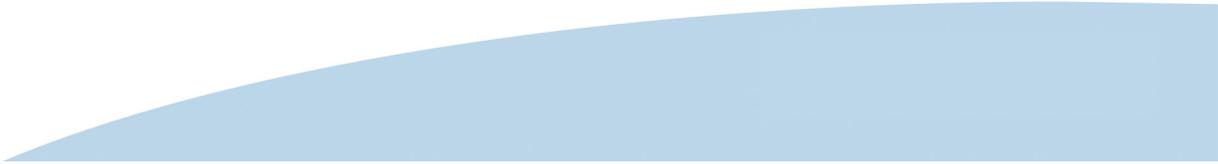
in association with **Concept 4 Creative and Community
Consultants**

July 2008

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Introduction

This report brings together the collated responses to the North West Plan Partial Review consultation on the options Housing

The consultation took place between 1st June and 4th July 2008 and focussed on seeking out stakeholder views on a series of options. These options are show in Appendix One.

Stakeholders were invited to contribute their views in one of the following ways;

- Workshops for stakeholders
- An online or paper questionnaire
- Via a free phone number

Stakeholders also had the opportunity to comment at the earlier Consultation on the Draft Project Plan stage.

The consultation activity is discussed in more detail in the full project report. This report outlines what people told us about the options in these themes through the methods outlined above.

Section One lists the responses received. These responses were received through the online questionnaire, the paper questionnaire, the free phone line and by letter.

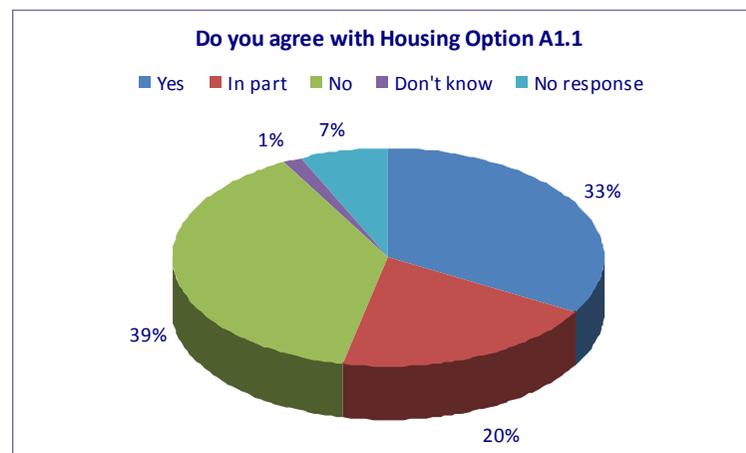
Workshop information, information on comments outside the questionnaire process, information that was received within the Draft Project Plan stage and the options paper are contained in a separate document.



1 Questionnaire Responses

1.1. Do you agree with Housing Option A1.1?

Do you agree with Housing Option A1.1?	
Yes	25
In part	15
No	32
Don't know	1
No response	5
Total Responses	78



The table below shows the verbatim comments received. We have removed 2 blank responses.

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
Macclesfield Borough Council	Yes	Macclesfield BC supports the approach set out in option 1.1 by taking forward the existing housing provision figures and existing spatial distribution as proposed in the Secretary of State's proposed changes to draft RSS. Although Macclesfield had originally sought a lower figure than this in the draft RSS, we can now accept that this level of provision within the borough is appropriate.		
Individual response	Yes	Option 1 is the best option being the result of the RSS Panel Report after considerable consultation and examination. Points 1.The priorities for housing should be regeneration and affordability, with emphasis on rented housing delivered by housing associations. One of the problems of this Region is that much of it was designed around the motorways and is car-based. Rented housing would support worker mobility. 2. Many areas will have reached the limits of their existing infrastructure and this should be considered.		
Indigo Planning Limited	In part	Whilst the overall increase in housing numbers promoted through the emerging RSS is		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		supported, on the basis that central Government is promoting even higher rates of housing provision, it is not considered that maintaining the currently proposed rate of provision will address the changing policy agenda. The soon to be adopted figures in RSS are only just in line with current housing delivery rates, and thus will not be sufficient to make the step change which the Government seeks, and which is needed to kick start the delivery of affordable housing. As is noted in Appendix 2, Chester has a pronounced affordability problem, and therefore continuing the current housing delivery rates in towns such as Chester will not enable them to step up delivery of new housing to meet local needs. Furthermore, maintaining the current figures will not account for additional housing provision required as a result of successful Growth Point bids, which have been specifically made, inter alia, to address housing need issues across the region.		
Northwest Regional Development Agency	No	Option A1.1 proposes continuing the level of housing provision as set out in the Proposed Changes to Submitted Draft RSS (at least 23,111 dwellings per annum). As acknowledged in the accompanying text, should the level of housing provision proposed be interpreted as a target rather than a minimum it is unlikely to address Governments's agenda as set out in the Housing Green Paper. We would also agree with the assumption that (if regarded as a target) this level of housing provision is unlikely to fall within the range proposed by the National Housing and Planning Advice Unit (NHPAU), given previous indications that NHPAU are likely to outline a housing supply range between 28,400 and 32,000 dwellings per annum. (NHPAU (2007) Developing a target range for the supply of new homes in England, Table 18, p30) We note the reference to the accommodation of any successful housing growth points within the levels of overall housing provision. We feel that it is important for any option put forward to be sufficiently flexible to accommodate any successful growth points. In this respect we would tend to agree with the assumption in Option A.1 that proposing to maintain the current level of housing provision (if interpreted as a target) as set out in draft RSS is unlikely to provide sufficient flexibility in order to accommodate any potential successful housing growth points.		
Indigo Planning Ltd		Whilst the overall increase in housing numbers promoted through the emerging RSS is supported, on the basis that central Government is promoting even higher rates of		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		<p>housing provision, it is not considered that maintaining the currently proposed rate of provision will address the changing policy agenda. The soon to be adopted figures in RSS are only just in line with current housing delivery rates, and thus will not be sufficient to make the step change which the Government seeks, and which is needed to kick start the delivery of affordable North West Plan Partial Review Planning, Transport and Housing Directorate North West Regional Assembly Wigan Investment Centre Waterside Drive Wigan WN3 5BA By email and post NWPRR@cagconsult.co.uk 2 July 2008 Our ref. DH/SW/192007/06 Page 2 of 3 housing. As is noted in Appendix 2, Chester has a pronounced affordability problem, and therefore continuing the current housing delivery rates in towns such as Chester will not enable them to step up delivery of new housing to meet local needs. Furthermore, maintaining the current figures will not account for additional housing provision required as a result of successful Growth Point bids, which have been specifically made, inter alia, to address housing need issues across the region. In respect of the potential change in spatial distribution of housing as set out in options A1.1 and A1.2, a revised spatial distribution in the Liverpool City region would remove the emphasis in percentage terms away from Liverpool and Manchester, diverting more housing to the rural area such as South Cheshire. Whilst CEG accepts the need to better provide housing in rural areas, this should not be to the detriment of the main urban areas and the focus on reuse of brownfield sites to deliver sustainable housing and other growth.</p>		
Home Builders Federation	No	<p>We would not support the continuation of the level of overall provision set out in the Proposed Changes to the Submitted Draft RSS. Time and Government advice has moved on since the publication of the draft RSS. The Government has announced an intention to significantly increase overall housing delivery targets nationally and has confirmed that delivery of housing is a national priority. The Housing Green Paper is Government policy and as such it is a material consideration and should forms part of the evidence base for the Partial Review of the RSS. PPS3 emphasised the Government's overall ambition to increase housing supply, which has now been reaffirmed through the Housing Green Paper. On 28 June 2008 the National Housing and Planning Advice Unit (NPHAU) published its advice about the housing supply range to be tested by Regional Planning Authorities, 'Meeting the housing requirements of an</p>		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		<p>aspiring and growing nation: taking the medium and long-term view'. The NHPAU recommended regional supply ranges 2008 – 2026 for the North West region are 26,600 (bottom of the proposed housing supply range) to 29,500 (upper end of the proposed housing supply range). We would advocate that the North West Regional Assembly should assess the range as defined by the NHPAU in relation to overall housing provision. NHPAU guidance should be considered an effective indicator for housing delivery. We would like to reiterate our support in the Proposed Changes document for the deletion of the reference to 'maximum' housing provision. It is appropriate that there should be no ceiling on house building numbers in the North West and the HBF considers the removal of upper targets for housing figures will bring the strategy closer in line with PP3S. We would</p>		
<p>Countryside Properties Ltd</p>	<p>No</p>	<p>We would not support the continuation of the level of overall provision set out in the Proposed Changes to the Submitted Draft RSS. Time and Government advice has moved on since the publication of the draft RSS. The Government has announced an intention to significantly increase overall housing delivery targets nationally and has confirmed that delivery of housing is a national priority. The Housing Green Paper is Government policy and as such it is a material consideration and should form part of the evidence base for the Partial Review of the RSS. PPS3 emphasised the Government's overall ambition to increase housing supply, which has now been reaffirmed through the Housing Green Paper. On 28 June 2008 the NHPAU published its advice about the housing supply range to be tested by Regional Planning Authorities, 'Meeting the housing requirements of an aspiring and growing nation: taking the medium and long-term view'. The NHPAU recommended regional supply ranges 2008 – 2026 for the North West region are 26,600 (bottom of the proposed housing supply range) to 29,500 (upper end of the proposed housing supply range). We would advocate that the North West Regional Assembly should assess the range as defined by the NHPAU in relation to overall housing provision. NHPAU guidance should be considered an effective indicator for housing delivery. We would like to reiterate our support in the Proposed Changes document for the deletion of the reference to 'maximum' housing provision. It is appropriate that there should be no ceiling on house building numbers in the North West and the HBF considers the removal of upper targets for housing figures will bring the strategy closer in line with PP3S.</p>		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
Environment Agency	In part	<p>This option is currently the only one which has been tested through EiP and is underpinned by evidence around environmental and infrastructure capacity. The conclusion was that this option was sustainable, deliverable and would result in no likely significant effects on European protected sites only applies to the period till 2021 (and 416,000 new homes). However, the provision of 23,111 homes per annum over the period 2007 till 2032 will result in a RSS total under this option of 577,775. The removal of the ceiling element of RSS housing targets has, as you have clearly stated, led this figure being seen as a minimum. The impact of these additional 161,775 homes has not yet been tested. Various appraisals are being undertaken of all of the options. We also welcome the intention to re-visit the regional flood risk appraisal. However, as you have rightly identified on page 7 of your options paper, several studies on the implications of growth on the regions critical infrastructure and environment are still underway. The panel's comments on draft RSS (para 6.38) still apply. Currently there is no evidence to show that water and sewerage infrastructure could be made available to support levels of development beyond 416,000 without adverse impacts on the integrity of nature conservation sites of international importance. The Environment Agency can therefore currently only support this option until 2021. Further work will be needed to understand the implications of growth beyond that timeframe. However, we wish to work with the Regional Assembly and others to enable us to assess any capacity issues and to explore opportunities to sustainably accommodate this additional growth.</p>		
GONW	No	<p>Whilst this option does not sit within the NHPAU ranges, it is understood that it is included as the status quo option for the purpose of sustainability appraisal. This option would not meet the long term objectives for housing as set out in the Housing Green Paper and given the evidence of the NHPAU report would potentially lead to a worsening of the affordability situation, given longer term market conditions. As previously stated the distribution reflects current housing distribution within RSS, this may not fully reflect the priorities for growth in the longer term dependant upon the final form of RDF1 and the outcomes of housing growth bids. This comment applies to all the options where the distribution is based on following current distribution .</p>		
Lancashire CPRE	In part	<p>In an ideal world current housing targets would be abandoned, to allow local authorities</p>		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		the flexibility to respond to local housing conditions as they arise. This Option appears to offer the least over- provision of housing land which can be chosen. Answer: It appears likely that the publication of the Housing Green Paper played a significant role, along with falling economic activity due to rising oil prices and the "credit crunch", in precipitating the collapse of the housing market which followed its publication. The intention of the Green Paper was to provide so many houses that housing became a buyers' market and prices fell, making housing affordable for the majority of the population. No wonder the housing market collapsed!		
Bartonwillmore on behalf of Paycause Ltd	No	Paycause does not believe maintaining the current strategy would meet the increasing needs of housing in the North West Region. The recent publication of the NHPAU "Meeting the Housing requirements of an Aspiring and growing nation". This document identifies that the North West region should be delivering at least between 26,000 - 29,500 net additions to dwelling stock per year to 2026. The current strategy does not properly allow for this and as such needs to also address other issues answered in ques 2 below.		
Preston City Council	No	Given the Government's increased targets for new housing growth and the decision by the Secretary of State to remove the word maximum from total RSS housing figures in table 7.1 in the proposed changes to the draft RSS, these figures are in practice likely to be exceeded and, therefore, cannot realistically be used to formulate policy.		
Halton Borough council	No			
National Trust	Yes	The latest evidence is yet to be tested, but fundamentally relies upon trends relating to an apparently ever-upward trend in house prices and demand. It is also apparent from the evidence of the last 6 months that house prices are falling significantly and most commentators expect them to continue to do so for many more months. Evidence on the ground is that developers are pulling off sites and are not proceeding with potential acquisitions. All the signs are that demand and construction of houses will be well below trend in the foreseeable future. Whilst it is not considered that a market led approach is the right one in terms of setting housing targets it is nonetheless clear that the house building industry does not currently have the capacity to build 23,111 houses per annum in the Region and consequently even this figure (the lowest of those set out		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		in the options) is unlikely to be achievable in the short-medium term.		
Blackpool Council	No	The Council has supported the concept of increased rates of growth above emerging RSS as part of its joint submission with Central Lancashire authorities for Growth Point status. Consistent with this stance, it would support the consideration of higher rates of development across the region than reflected in emerging RSS, and more specifically across Central Lancashire City Region as a whole and the growth point authority areas of Preston, South, Ribble, Chorley and Blackpool. However the spatial distribution of such additional growth may need to differ somewhat to the existing district & housing market split because of local constraints (see response to Option A2.1).		
Local Resident	Yes	The lower of the 3 options is supported. NWRSS is a totally undemocratic top-down process. The number of houses proposed for Eden (4,300 by 2021) is already hugely high when looked at in the context of the realities on the ground. By the time that the "bottom up" side of the process is on the table – with real sites – it is too late for meaningful debate, the numbers are sorted. The whole thrust of the NWRSS Partial Review is a fundamental contradiction of planning policy principles in that it seeks to apply huge levels of additional growth to rural areas. Housing growth should be concentrated in the urban conurbations where the major infrastructure and assets are concentrated. Towns the size of Penrith (15,000) and Appleby (2,900), are places for much lower growth, and don't have the level of facilities to justify major expansion. Yet the current NWRSS A1.1 Option implies an increase of around 30% in the number of houses in these settlements by 2021 – a proposed much higher level than is typical in the main towns and cities which are supposed to be the priorities for growth? National planning policy says that housing growth should be appropriate to the scale and character of its settlements. Eden's recent growth has been greatly driven by in-migration due to the attractive lifestyle and environment". With these housing numbers, that is what will continue to happen – in direct conflict to Eden's own strategy which is meant to focus on meeting local needs for local people, and respecting Eden's character and local distinctiveness.		
National Housing federation	No			

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.																																			
South Lakeland District Council Development Plans Team	Yes	<p>OPTION A: Overall housing provision and spatial distribution Of the 2,196 annual dwellings required in Cumbria and North Lancashire in the proposed changes to the Regional Spatial Strategy, 400 are targeted at South Lakeland District Council (SLDC). This represents 18.2%. On the basis that this would continue to be the proportion allocated to SLDC, indicative housing figures have been calculated for each option to inform our comments.</p> <table border="1" data-bbox="808 512 1850 608"> <thead> <tr> <th>OPTION</th> <th>Cumbria</th> <th>Target Percentage</th> <th>for SLDC</th> <th>South Lakeland</th> </tr> </thead> <tbody> <tr> <td>Target Overall provision 2007-2032</td> <td>A1.1</td> <td>2196</td> <td>18.2%</td> <td>400</td> </tr> <tr> <td></td> <td>A1.2</td> <td>3467</td> <td>18.2%</td> <td>630</td> </tr> <tr> <td></td> <td>A2.1</td> <td>2660</td> <td>18.2%</td> <td>485</td> </tr> <tr> <td></td> <td>A2.2</td> <td>4200</td> <td>18.2%</td> <td>765</td> </tr> <tr> <td></td> <td>A3.1</td> <td>3040</td> <td>18.2%</td> <td>555</td> </tr> <tr> <td></td> <td>A3.2</td> <td>4800</td> <td>18.2%</td> <td>875</td> </tr> </tbody> </table> <p>The council supports option A1.1 (continue the level of provision set out in the proposed changes to submitted draft RSS – at least 23,111 dwellings per annum and continue the existing spatial distribution). The options paper states that ‘in terms of the spatial distribution this was agreed through the current review of the RSS and represents one which addresses the agreed priorities of the region as a whole’. Therefore is it not beyond the scope of the partial review to amend a new spatial distribution that has just been approved by central government? The figures above demonstrate that altering the spatial distribution can have a significant impact on the annual target for South Lakeland. At the lower end of the spectrum, 630 dwellings a year would represent a 60% increase over the current target. Therefore in devising the alternative spatial distribution it appears that no regard has been given to the impact of what appears to be a small shift – from 9.5% to 15% - will have in terms of house building requirement for rural authorities such as South Lakeland and the scale of development it would necessitate. A district wide target of 400 is considered to be the most that can be planned for. I would cite the following reasons:</p>			OPTION	Cumbria	Target Percentage	for SLDC	South Lakeland	Target Overall provision 2007-2032	A1.1	2196	18.2%	400		A1.2	3467	18.2%	630		A2.1	2660	18.2%	485		A2.2	4200	18.2%	765		A3.1	3040	18.2%	555		A3.2	4800	18.2%	875
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Lancashire County Council	No	<p>In terms of overall provision this option would not address the agenda set ut in the Housing Green Paper. It is unlikely to fall within the range to be proposed by the NHPAU. The Option would not be able to accommodate the levels of growth envisaged in the submitted Central Lancashire, Blackpool Growth Point Expression of Interest.</p>																																					
Sustainable Neighbourhoods Pool Manchester	Yes	<p>Although this option doesn't fall within the range suggested by the NHPAU it might allow for a targeting of derelict and/or long term voids to be brought back into use, which would be beneficial to communities suffering from high levels of unoccupied</p>																																					

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		<p>housing and the knock-on effects to society that such property can bring. The range of provision suggested by the NHPAU is between 700-800k by 2032. This seems an astronomic figure and suggests that there are tens of thousands of people in with nowhere to live; and while there is a homelessness problem in all urban areas, building new housing will not remove a problem that is the result of social and moral breakdown facilitated by a lack of investment in the Community and Voluntary Sector. In Manchester there is a below national percentage of families/individuals living in owner occupied accommodation and the Council wishes to rectify this discrepancy. There are targets and indicators set out to address this in the new Manchester LAA, including targets for returning empty property to the housing market. If the onus remains for an increase in owner occupation (which is a particularly British aspiration and unlike the continent) perhaps more should be done to limit the amount of by-to-let property owned by individuals and return those properties to the open market for owner occupation; thus helping to satisfying the demand. 19% of the housing stock in Manchester is private rented and much of this would be affordable if appropriate mortgages were on offer to facilitate groups of un-married individuals to buy homes together using their combined incomes. It seems grossly unfair that 19% of housing in the city is owned by a relatively small proportion of society who are benefiting financially from the housing crisis. There has in recent years been a drive to build 1 and 2 bedroom apartments in the city and a significant %age of these remain unoccupied (as much as 40%). With Manchester's large ethnic mix and subsequent over crowding problems, provision should be made for accommodation of dwellings of 4+ bedrooms which are in demand across the city, and perhaps if more were done to accommodate consultation with the community rather than with developers then the affordable housing crises would be lessened. It is correct that there should be an emphasis on building in already urban areas as this cuts the need for extra infrastructure such as roads and sewage systems and also reduces the need to commute into the central business districts of the major urban areas in the region by private vehicles. However, the issue of affordable housing in rural communities is a problem, one extenuated by the allowance of second homes for the well off and perhaps this should be addressed.</p>		
Cheshire West and	No	This option appears to have been discounted given that it would not meet the		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
Chester (comments represent informal officer views)		objectives of the Housing Green Paper		
Manchester Disabled People's Access Group	Yes	Not clear that enough land available for increase Would not want to encourage more development in rural areas which would increase energy use and affect climate change issues as there would be more commuters coming into city areas Important to support developments allied to transport, employment and social issues		
Haslington Parish Council	In part	The definition of South Cheshire is not clear from your document but this appears to have the lowest figure of the options provided. Equate lower number of houses with less disruption to rural communities.		
Stockport Metropolitan Borough Council	Yes	Stockport Council strongly supports the submission made by AGMA and has some additional comments.		
Merseyside Policy Unit	In part	This option represents a spatial distribution and level of housing provision which has been tested through the RSS process, including Examination in Public. It reflects a housing provision which the Merseyside authorities are comfortable with, although the question of how Growth Points would be accommodated in these figures, should any of the three bids from the Liverpool City Region be successful, would need to be addressed by sub-regional discussion. As with all the housing options, the information available is not sufficiently detailed for us to work through all the implications, and we expect to comment in considerably more detail when the draft policies are published.		
North West Environment Link	In part	HOUSING NUMBERS This option is the least unpalatable of those on offer. However, we cannot wholeheartedly agree with this option as it transforms a maximum target level of housing into a minimum without any supporting evidence to back such a fundamental change. GONW's decision to ignore the Panel's recommendation (see below) appears to have been prompted not by any new research into the region's capacity to absorb more housing, but in obedience to national targets in the Government's Green Paper on housing. The RSS Panel report explicitly recommended that these figures should be a maxima "we consider that the net increase of 416,000 should be regarded as both a target and a ceiling" (6.100). They did so after careful consideration of representations at EIP, particularly from The Environment Agency		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		<p>concerning the potential impact of these housing figures on infrastructure (water/waste etc) and from environmental organisations on the lack of research into the potential environmental impact of this proposed increase in housing provision. The Panel thought it unwise to plan for a higher level of housing, given the uncertainty about the impacts on the environment and on urban regeneration of present proposed levels. The proposal in Option A1.1 can just about be justified AS A MAXIMUM, but, given the recent downturn in the housing market from which the North West is not exempt, the even higher minimums suggested in A2.1 & A3.1 have absolutely no basis in reality. However, taking either of these options may have very damaging consequences, ranging from oversupply, blight, shifting of investment and development away from areas in genuine need of regeneration and, perhaps most importantly, environmental degradation leading to a reduced quality of life. There is therefore an excellent case for sticking with the provision recommended by the Panel, and for concurring with their view that "the maximum figures will not impose a rigid constraint on provision in the immediate future. We would expect the RSS to be reviewed long before 2021. if there is a danger that the retention of the maximum figures would unnecessarily constrain the provision of housing to meet identified requirements, that matter can be considered at the review". Given that private sector housebuilding has remained at a constant level nationally for the past decade (circa 140,00 pa) and, according to industry representatives, is predicted to fall to circa 100,00 over the next 2/3 years, Option A.1, even as a maximum, cannot seriously be considered a constraint. SPATIAL DISTRIBUTION NWEL support retention of the existing distribution because, in the absence of any evidence justifying a change, deviating from the agreed broad spatial framework for the region seems to be unnecessary. There is also no evidence that any change would achieve the vital objective of increasing the numbers of affordable housing in rural areas. It is important to recognise that an increase in housing provision per se in rural areas will not necessarily increase the proportion of affordable houses and may, by increasing the proportion of higher income 'commuting households' have a detrimental impact on local service provision and social cohesion.</p>		
Preston City Council	No	<p>Given the Government's increased targets for new housing growth and the decision by the Secretary of State to remove the word maximum from total RSS housing figures in table 7.1 in the proposed changes to the draft RSS, these figures are in practice likely</p>		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		to be exceeded and, therefore, cannot realistically be used to formulate policy.		
Charles Topham Group Ltd	No	Will not meet needs for new housing as set out in the various government documents including the Housing Green Paper.		
RPS Planning	No	This option would not provide the increase in housing provision necessary to meet the most recent household projections. The distribution is too focused on Manchester and Liverpool and the delivery of this level of increase in housing proposed in these locations is questioned.		
Satnam planning services ltd	No	This option fails to meet the housing needs of the region and will lead to shortages and price rises which could be avoided by sensible provision figures.		
Carlisle City Council	No	Continuing the identified RSS levels of development would not deliver the growth aspirations for Carlisle. This would have implications for both the urban and rural parts of the district.		
Copeland Borough Council	No	We cannot support an option which does not a) provide for a sufficient level of housing nor b) indicate what the intended spatial distribution is at the district level. There are different factors at work in the housing market areas of Cumbria so there needs to be greater sensitivity in the allowances set for the different parts of the County. The West Cumbria Masterplan (Britain's Energy Coast, 2007) sets out a programme for the regeneration of this Priority Area (Policy CNL 2) which it estimates would require an additional 6,000 dwellings between 2003 and 2021 over and above the 9,000 scheduled in the current RSS. This equates to an annual average of 833 dwellings for the Copeland and Allerdale Boroughs outside the National Park, an average which yields a total West Cumbria requirement of up to 20,825 dwellings between 2007 and 2032. Other areas of the County have their own needs - regeneration in Furness, growth in Carlisle, affordability issues in the east and south. It is not for us to make a case for their housing share but it has to be said that maintaining higher general housebuilding allowances for say, Eden than for Copeland will not assist delivery of regeneration in West Cumbria so the current distribution balance across the county would require modification. All partners in the West Cumbria Strategic Forum are committed to the successful implementation of the West Cumbria Masterplan. This includes all Government departments, the NWRA and NWDA and Cumbrian local authorities. RSS is		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		key to this process and the Review should ensure that there is no unnecessary restriction on the supply of new, higher quality housing in the sub-region.		
Warrington Borough Council	No			
Ribble Valley BC	In part	Whilst this was considered by members to be a good option as it was based on existing proven evidence however as it does not accord with Government delivery aspirations for housing was seen as an unlikely option to be taken forward		
Liverpool City Council	In part	<p>For Liverpool, Option A1.1 represents no change from the draft RSS provision or distribution (Jan 2006), subsequently endorsed by the EIP Panel and the Secretary of State in the Proposed Changes to Draft RSS. This is something which Liverpool City Council have been comfortable with through the emerging RSS preparation process and are likely to be largely comfortable with in future. These figures have been "tested" in terms of demand and supply side implications. This figure (which for Liverpool is expressed currently as 1950 net new dwellings p.a.) is still considerably higher than that in extant RPG13 and whilst it is seen as necessary to help the regeneration of the city, there could be challenges for its delivery given the current economic situation and the fact that this figure is not now considered to be a maximum. The question of how Growth Points would be accommodated in these figures, should any of the three bids from the Liverpool City Region be successful would need to be addressed by sub-regional discussion. This Option is not likely however, to be supported by Government which since the publication of the Housing Green Paper in Autumn 2007 has set itself very high aspirational targets for new housing delivery by 2020. They are likely to wish to see the region accommodate and deliver more new housing</p>		
Highways Agency	Don't know	There is a need to see evidence of the impact of this level of housing provision on the region's infrastructure (road, rail, utilities etc) as part of this review. This is to help assess the sustainability and realism of such a level of provision and soundness of the plan. The transport dimension of housing provision must be assessed to support and inform decisions about levels of housing provision and location.		
Lambert Smith Hampton	No	The 'do nothing' approach is widely accepted as being inappropriate as emerging RSS housing provision figures are based on historic data. It would perpetuate issues that		

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		<p>have arisen recently e.g. increasing housing prices especially where restrictions have been put in place. Affordability is now a critical issue for every local authority. It would also not support the Government's objective of significantly increasing housing supply as set out in the Housing Green Paper. To retain this level of housing provision would not provide the flexibility, choice and support to enable the region to grow and prosper over the next 25 years. It would also limit the amount of rural housing provision which could be supplied. Retaining the spatial distribution would limit opportunities for providing rural housing provision and areas which have regeneration needs outside the Manchester and Liverpool City Regions. The current spatial distribution would also limit the choice and opportunities to grow, should Manchester and Liverpool be unable to meet their overall housing requirements.</p>		
West Lancashire District Council	Yes	<p>Until such time as the SHLAA's have reported the environmental capacity of the District and neighbouring authorities within the Northern Liverpool City Region HMA is unknown. The Council would therefore advise a precautionary approach based upon existing housebuilding rates, particularly given current market uncertainty. 300 units a year, as set out in current RSS for West Lancashire, is thought to be deliverable over a period of time. It should be noted that the timescales given for this consultation have not enabled the Council to properly evaluate the options. The fact that the SHLAA for the Northern Liverpool City Region HMA has not been completed means that there is a major gap in the evidence base at present and it is impossible to properly determine what the options may mean for West Lancashire. Given figures are now expressed as minimum figures, it is not clear what value there would be in having a higher figure, as it would appear that it will be left the market will decide in any case if extra housing, over and above these figures, will be delivered. It is not clear what control local authorities will have to ensure that development occurs in accordance with the spatial priorities. This comment applies to all options.</p>		
Pioneer Property Services	In part	<p>Support for the existing spatial distribution but not for the retention of the submitted draft RSS housing numbers of 23,111 per annum. Short term market considerations aside there is evidence to suggest that increased housing numbers are required up to 2032 in order to ensure long term affordability. Net additional completions for the region of 23,050 in 2006/07 demonstrate that the submitted draft RSS figures do not</p>		

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		represent a long term solution to affordability.		
Emerson Group	No	The figures are obsolete having regard to further projections of population and household formation. To try and continue would be tantamount to repeating the gross underprovision perpetrated by RPG13 which has contributed to the housing shortage in the North west and house price inflation up until the end of 2007.		
GVA Grimley (on behalf of Goodman)	No	This approach does not allow for increased housing numbers as recommended by the National Housing and Planning Advice Unit. Housing numbers within RSS need to be increased as part of this partial review.		
LDNPA	Yes	The North West Regional Spatial Strategy has had extensive consultation and negotiation. the figures expressed in the 'Proposed changes to RSS' (2008) are based on robust evidence of housing need provided by Local Planning Authorities and these Authorities should be given the opportunity to prove that these figures are both correct and realistic. The Housing Green paper sets out aspirational housing targets. Since they were expressed we have witnessed a downturn in the housing market with only 165,000 units delivered last year and an estimated 110,000 units for this year, (PLANNING Editorial 2/5/08). This falls short of the anticipated annual build rate of 240,000 units expressed by Central Government.		
Taylor Young Ltd	No	This figure is not high enough to accommodate increased migration into the North West and the figures from Local Housing Needs Surveys are mostly dated		
Wirral MBC	Yes	The Council would be able to contribute towards the delivery of this Option in line with current agreements.		
Allerdale Borough Council	In part	The S of S's Proposed Changes are a pragmatic way of grafting flexibility onto current trends and aspirations. Allerdale's annual target figure especially if it is not a maximum, gives us some opportunity to moderately increase the rate of housing delivery. Also, on this basis we have a 5 year supply at present. However, it is not clear that this option could deliver the scale of housing envisaged in the Housing Green Paper. Furthermore, it is unlikely that such a target could deliver the scale of affordable housing need in Cumbria as evidenced by Housing Needs Surveys. If the need is to be met in the timescales envisaged, and in the context of the existing funding regime for RSLs, the		

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		delivery of affordable housing must rely heavily on "quotas" in otherwise open market developments. With the figures in this option the percentage quotas necessary to deliver the need would have to be at such a high level that the viability of most developments would be undermined.		
Upper Eden Community Plan Group	No	The sub regional spatial distribution of housing as expressed in the option and in the Submission version of the RSS does not provide sufficient housing for the area we represent (part of Eden). The current figure of 239 pa for Eden provides less housing than the projected household growth figure would suggest is required to keep the population stable. As a result this level of housing development is likely to exacerbate the affordability problems. However, the local spatial distribution of housing is a key factor in the likely success of a strategy to improve the affordability of housing generally. We consider that there are issues with the Housing Market Assessment Areas at local level which fail to identify the small but acute levels of housing need in isolated rural settlements. The agglomeration of housing need, as recognised by the Assembly at regional level should be refined by studies at local level. The same principle applies to sparse rural areas where parish plans can provide a level of refinement that district plans can not easily achieve. Now that Regional planning documents are to be considered as policy rather than guidance, it is pertinent that the RSS partial review engages effectively with Parishes in order to provide the continuity of delivery of development on the ground that has been lacking in regional planning exercises hitherto. The Government has rightly identified rural housing as a key issue that requires further discussion. We do not consider that the recent policies of general restraint in all settlements in rural areas should continue. Rather, we consider that an approach that allows limited allocations to all communities, and which harnesses the opportunities within rural communities to provide sites and affordable housing without requiring significant public investment should be pursued. These ideas are set out in more specific detail at www.kirkby-stephen.com and follow the links to the Upper Eden Community Plan.		
Pendle Borough Council	No	The Strategic Housing Market Assessment for the Burnley and Pendle housing market area indicates that there is a gross overall demand for new dwellings in the Pendle area. The SHMA provides a Balanced Housing Market calculation which indicates that		

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		<p>the average annual figure for Pendle should be 275 units. Continuation of the current annual provision rate of 190 dwellings would not provide sufficient dwellings to meet the needs and demands within the borough. Furthermore, in order to deliver the affordable housing target, as set out in the SHMA, then a higher provision figure will be required to help achieve the viability levels needed to provide this amount of affordable housing. The current average annual build rate in Pendle is calculated as 270 (over the last five years). This is a significantly larger number of dwellings than required by the current RSS provision figure. The average annual build rate has also been affected by the restrictive policy position which is currently in place. If this policy restriction were to be removed the build rates are likely to increase. Population projections and increases in household formation suggest that there will be an increase in the number of dwellings required to accommodate the population over the next 18 years. This evidence indicates that there is a need to provide a higher housing provision figure for Pendle.</p>		
Chorley Council	Yes	<p>Uses RSS figures and spatial distribution of 16%, However our members expressed concern at the short period allowed by the NWRA for the feedback of responses.</p>		
AGMA (the Association of Greater Manchester Authorities)	In part	<p>Comments on the Options (i) The evidence for the options</p> <ul style="list-style-type: none"> • The figures being put forward by the Assembly are based on advice produced by NHPAU for the purpose of the Housing Green Paper, looking to 2016/2020. These are not readily transferable to the RSS looking to 2032. Moreover NWRA have taken the NHPAU forecasts and extrapolated these to 2032 (and backdated them to 2007), which is a questionable approach. For example the ONS revised 2004-based household projections suggest that household growth will peak over the period 2011-2016 and drop off significantly thereafter. • The forecasts are based on demographic trends and do not factor in assumptions about economic change. They also make a number of assumptions around international migration, which are extremely significant for the outcomes. • The NHPAU is due to advise Government further on levels of house building required to 2032 imminently and the 2006 based ONS household projections are also due shortly, it is therefore potentially unsound to base decisions on options at this stage using these figures. Coupled with this is the fact that the consultation process has been shortened and therefore if new projections or advice are produced within the next month it will 		

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				<p>not be possible to take these on board as part of this options consultation process. • Based on comparison with the ONS revised 2004-based household projections AGMA's view is that the lower end of the housing supply range should be around 23,000 dwellings p.a., similar to Options A1.1 and 1.2; and the high end of the range should be around 27,000 dwellings p.a. This is moving towards the 28,000 dwellings p.a. put forward under Options A2.1 and 2.2 although the latter are at the very top of the range that should be considered through the Partial Review. The figures put forward under Options A3.1 and A3.2 appear to be much too high. (ii) The scale of forecast increase The figures at the middle and high end of the range of options appear unrealistic, given that • In GM we are only just approaching delivering the level of development proposed in the new RSS after a period of relatively high economic growth over the last 10 years • We are facing a significant downturn in housebuilding for the next 2-3 years at least, and any dip in construction will require compensatory higher figures later in the plan period • A number of Districts in GM were concerned about the impact on land supply/green belt of anything approaching a 20% increase in housing provision in the current RSS period to 2021 – in response to CLG's invitation on the New Growth Point submission. The NHPAU's figures underpinning NWRA's options represent a 21-38% increase over new RSS provision (backdated to 2007), so the increase would have major implications in the near future for land supply in GM. The evidence to support the realism and deliverability of the options should be questioned over the coming months. (iii) Spatial distribution within the region The spatial distribution is varied from 73% in Manchester City Region (MCR) and Liverpool City Region (LCR) and 27.5% in the rest of the NW under existing Draft RSS (Options A1.1, A2.1, A3.1); to 63% and 39% respectively under the new scenario Options A1.2, A2.2, A3.2). A 10-12% shift to "rural areas" is a significant change in overall strategy, given that • It would result in between 58,000 and 80,000 fewer dwellings being located in the two City Regions, instead going to the other parts of the region (potentially along with associated economic growth). The higher end of these figures equates roughly to the district of Bury, and shows the significant difference between the two spatial distributions proposed. • For the "rural" sub regions which receive additional housing under the alternative spatial distribution, the impact is potentially huge. Under options A3.1 and 3.2 the dwelling requirement in Central/North Lancashire, Cumbria and South Cheshire</p>

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		<p>would be 175% higher (312,000 compared with 113,800) when compared with planned provision under Draft RSS. • Shifting housing around in this way should be related to where the jobs will be provided – if RSS is attempting to locate housing to support economic growth, and to limit increases in carbon emissions by reducing commuting.</p> <p>(iv) Spatial distribution within each sub region There is a risk in the NWRA postulating new figures at sub regional level without indicating where within the sub region the growth will go. Shifting growth to “rural” sub regions could lead to massive growth of towns such as Crewe, Preston, Lancaster and Carlisle, rather than development appropriate to rural settlements. These are all towns identified as “foci for growth” in GONW’s Proposed Changes, a change which AGMA has made strong objection to as undermining the spatial strategy and priorities of RSS. There is a more direct implication for GM in that debating top down figures by sub region could lead to a figure for MCR which can be used to promote growth in Warrington. (v) Phasing/Managing the supply of land The risk associated with suggesting that such large housing numbers are needed, looking so far into the future, is that a large amount of land will be released throughout the region – much of it greenfield and possibly Green Belt. In this situation housebuilders will be able to “cherry pick” sites and there could be a surge in development in the Shires, as happened in the 1960s and 1970s. It is vital that there is careful phasing to ensure that such sites are not released early at the expense of securing urban regeneration and the redevelopment of previously-developed land. (vi) Infrastructure The huge scale of growth that is being proposed in these options will inevitably have major implications for infrastructure required to support it. This is not given any consideration in the Options consultation. There is an issue around how this infrastructure would be funded in a region such as the North West. Moreover the wide range of figures being put forward, and the potential weakening of the spatial distribution of development, does not provide the level of certainty infrastructure/utility providers are seeking in their forward planning. The possibility of large scale land release throughout the region, potentially on greenfield land, would lead to much more expensive investment requirements to service development. A Preferred Option AGMA’s view is that a large degree of caution needs to be exercised regarding the forecasts being used by the NWRA to estimate future housing requirements. Very little evidence has been put forward to support the</p>		

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		<p>options, and what has been provided is very weak. Virtually no information has been provided on the impacts. In this situation it is extremely difficult to express a preference amongst the options.</p> <ul style="list-style-type: none"> • At this stage Option A1.1, which is the lowest end of the range of options and maintains the current spatial distribution of housing, appears the most sensible and sustainable, and minimises the risk of large amounts of land being allocated unnecessarily. It is recognised that the level of housing within this option may need to increase in order to cater for New Growth Points and an increase in house building. However the middle and high options would potentially lead to unsustainable patterns of growth dispersed around the region. • The Partial Review should ensure that the priority of regional spatial strategy remains the regeneration and growth of the conurbations of Greater Manchester and Merseyside; and that if the level of demand predicted is to be met it should be without compromising the established priorities for growth and development, and spatial principles, set out in Draft RSS. • There should be a phased approach at the regional as well as the local level, so that if the predicted demand materialises the housing figures in RSS are increased gradually and over time, particularly in areas outside the priority areas, and then only if the demand cannot be accommodated in the conurbations. For example, the figures for housing requirements could be lower at the beginning of the Plan Period than at the end • RSS should follow the principles of "Plan, Monitor and Manage" as set out in Planning Policy Statement 3 (PPS3). This would mean that the policies of RSS should provide the scope for flexibility in changing circumstances (just as Core Strategies are expected to do under CLG/GONW guidance), without the need for a radical change in the figures which are already in the Proposed Changes and which are already a major increase on what operated previously • It should be made clear that core strategies should not release land on the basis of figures which contain a large element of uncertainty and look as long term as to 2032. Core strategies should bring forward land in specific periods aimed at controlling the supply and deliverability of sites in the right locations to achieve agreed priorities. Otherwise there is a danger of un-planned development throughout the region – again, as happened in the 1960s and 1970s. 		
Oldham Rochdale Partners In Action	In part	<p>The Oldham Rochdale Pathfinder programme aims to tackle housing market dysfunction in some of the most deprived areas in the region. A key strand of our policy is to both retain and attract economically active households through the development of new,</p>		

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		<p>high quality housing. We recognise, however, that the Government are committed to an agenda which promotes substantial increases in house building which it sees as a means of addressing affordability issues in the wider housing market. Clearly, the Pathfinder will be concerned if levels of housebuilding are proposed that may have negative implications for regeneration across Greater Manchester/city region generally, and Oldham and Rochdale more specifically. Option A1.1 proposes a level of housebuilding similar to recent (2006/07) build rates. However, such rates have only been achieved at a time of relative economic prosperity. Given current market conditions the idea of building significantly more houses seems to be out of touch with reality. Of course, the current "credit-crunch" may be relatively short term and shouldn't deflect too much from a long-term strategy. However, there will clearly be delivery impact arising from the current situation as developers slow their development programme or go out of business - the implications of this cannot be ignored completely. Therefore, in the absence of any real understanding of the implications - spatially, economically, socially and environmentally - of higher levels of building as set out in options A2.1 and A3.1 - the Pathfinder is unable to support at this time the higher levels of building and must express a preference for option A1.1. Clearly option A1.1 does not fall within the range of house building suggested by the latest NAHU guidance and it may be that a higher level of building within the region can be supported in time - but this would have to be in the context of having a much fuller understanding of the implications for Greater Manchester, the wider city region and the Oldham Rochdale Pathfinder. The goal should surely be to achieve sustainable levels and patterns of housing and economic growth whilst ensuring that regeneration initiatives are able to play a full and positive role in achieving this growth.</p>		
Congleton Borough Council	No	<p>Due to the currently available evidence, alongside National guidance, it does not appear logical to continue with the level of overall provision set out in the Proposed Changes to the Submitted Draft RSS. Therefore Option A1.1 and Option A1.2 are not supported.</p>		
English Heritage	Yes	<p>The Submitted Draft RSS has yet to be finalised and objections to the Secretary of State's proposed changes remain outstanding. Decisions on Growth Points have yet to be announced, the North West does not have any eco-towns. The RSS Panel Report stated that the housing numbers in the report "should be regarded as both a target and</p>		

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		<p>a ceiling". It is entirely unclear what the Government's approach of removing ceilings means for the implementation of spatial strategy and how, for example, this relates to environmental capacity/impact, green belts or urban regeneration. Any significant increase in housing numbers must be founded on a sound evidence base which includes examining potential environmental impacts. Whilst RSS looks forward to 2032 and the peaks and troughs associated with housing supply/demand may average out, RSS housing options must be practicable and must recognise the current substantial fall in house building and buying rates. Over-allocating land could result in the harder to develop land and the harder to implement policies becoming even harder to achieve and as result, for example, harming housing market renewal initiatives aimed at reviving areas of traditional housing and minimising vacancy rates. RSS policy on housing provision must not undermine the very real but fragile progress made in the region's housing market renewal areas. Increasing housing numbers is likely to put pressure on green belts, this is an issue for English Heritage where their role in preserving the setting and special character of historic towns is under threat. Increasing housing numbers is likely to lead to pressure for greenfield development with the potential to harm historic landscape character and the setting of heritage assets. The problem of the oversupply and vacancy of city centre flats should not be exacerbated by further increasing housing supply which would undermine the sustainability of regeneration initiatives. The policy should aim to make best use of existing resources in terms of the existing housing stock and the potential for the adaptive re-use of buildings for housing. The options are silent on developing creative means of bringing redundant and vacant housing and buildings back into productive use. Very little information is available on the growth point proposals. Issues surrounding growth point development will need to be properly appraised when further information is available, growth point numbers should not be subsumed into RSS figures without this.</p>		
NW Transport Roundtable	In part	It is the option which would have the least environmental impacts of those offered and it is closest to the figures recommended by the RSS EIP Panel, although it still represents higher figures than we believe a robust case has been made for.		
Cheshire East Council	Yes	It is considered that the safest option for the Partial Review would be to take forward		

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		<p>the existing overall housing provision figures and the existing spatial distribution as proposed in the Proposed Changes to Draft RSS . The other options proposed greatly increase the overall housing provision figures without offering any evidence of the likely impacts. As this is a Partial Review, it does not seem appropriate to propose such large increases in housing numbers in isolation without a review of interlinked policies related to other areas such as economic growth, transport and the environment. Any increase in new housing provision on the scale envisaged by following the lower or higher NHPAU figures is highly likely to lead to an excess of greenfield development and would result in excessive greenfield development and would result in the loss of Green Belt land within Macclesfield and Congleton Boroughs and excessive greenfield development around Crewe. This is also certain to be the case in many other districts in the north West; and therefore needs to be considered as a strategic issue by RSS rather than being left to local decision-making in each district. Since the Partial Review will not address any changes to the Green Belt, it would not be appropriate to take forwards options which would require the development of Green Belt land in order to deliver the new housing provision proposed. It is also considered that a major spatial redistribution for provision of new housing towards rural areas is not necessary or desirable. Whilst affordability in rural areas is an issue, a major spatial redistribution would be a blunt instrument with which to tackle the problem. Other policies specifically targeted at delivering affordable housing schemes in rural areas would be more appropriate and effective than simply increasing the provision for both affordable and market housing in rural areas. The potential increase in overall housing figures for the region combined with the potential increase in the proportion of provision for rural areas would lead to excessive and inappropriate development in rural areas. This may also undermine regeneration efforts in other urban areas. General Comments on the revisions to the Partial Review Options Consultation Timetable At the launch of the consultation, it was indicated that consultation on the options would take place from June – September 2008. The North West Regional association decided to change the timetable on the 14th March, during the project plan consultation period so that the options consultation would only last for four weeks during June. This information was not clearly conveyed to stakeholders, and as expressed in the introduction, the consultation period on the Secretary of State’s Proposed changes to the Regional</p>		

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		Spatial Strategy was still in progress; and that current RSS work on cross border north Staffordshire and south Cheshire Issues was just about to commence. The Council expresses its disappointment in the way that the timetable was changed and to submit the view that the revised timetable will not allow all stakeholders sufficient time to properly consider the issues and options - this is despite the 1 week extension later allowed.		
Chester City Council	In part	It is difficult to assess the implications of these options for Chester district and the West Cheshire area given that: <ul style="list-style-type: none"> • The results of the region's growth point bids (including the bid put forward for West Cheshire by Vale Royal, Ellesmere Port & Neston and Chester City Councils) have yet to be announced • Suggested housing figures in the Options paper are given for sub-regions that don't correspond to the 27 housing market areas identified by the Regional Strategic Housing Market Assessment (such as West Cheshire) With these reservations, the Council supports those options that provide maximum flexibility for local authorities to plan and deliver housing growth sub-regionally, working in partnership with neighbouring authorities in the North West and adjoining administrations (such as North East Wales). Given that the result of West Cheshire's growth point bid is not yet known, and that the house building targets set out in the Secretary of State's Proposed Changes are not expressed as maxima but can be exceeded, the City Council would support the level of housing provision set out in the Proposed Changes (Option A1).		
Lancaster City Council	Yes	This is the most realistic and deliverable for Lancaster. The option has been examined and found sound in the recent LDF Core Strategy Eip. Any increase may not be deliverable in terms of infrastructure and effect on environmental quality		
Town and Country Planning Association	No	The TCPA supported the Government's proposed changes to remove the cap on maximum housing provision to ensure that sustainable and appropriate housebuilding, if it were to exceed the targets, will be permitted to accommodate for the region's growth and prosperity. The growing population and increasing attractiveness of living, working and playing in the North West will need to be accommodated in the urban areas. But greater consideration and provisions also in the urban-rural fringes and rural areas where growth will complement existing community, economic and environmental aspirations within the wider city-regions framework and appreciating the		

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		growing importance of networked settlement patterns. Housing provision must be revised upwards to accommodate for housing growth in areas where is required, whether the conurbations or more rural service centres.		
CPRE North West	Yes	<p>NB Please note that rather than completing all 6 questions A1.1 – A3.2, which would be very labour-intensive and user-unfriendly, we will detail in Question A1.1 both the reasons why this option should be taken forwards, and why the others should be rejected. We agree with this option because this is the maximum level of housing recommended by the RSS Panel Report published barely more than 12 months ago. The Panel Report was exceptionally clear that these figures should be considered as maxima: “We consider that the net increase of 416,000 dwellings should be regarded as both a target and a ceiling.” (6.100). The Panel considered it “unwise” to plan for a higher level of housing, as the impacts on the environment and on urban regeneration were uncertain and untested (6.38-6.39). This figure – or one very close to it – was reached by an extensive process of research and discussion at local, sub-regional and regional level, and as such is derived from a sound evidence base at an appropriately devolved level, rather than imposed as an arbitrary target by a remote bureaucracy. No new evidence has come forward since the Panel Report was published to allay the Panel’s fears about negative sustainability and regeneration impacts from higher levels of housing provision. The policy environment has changed, in the form of the Government’s Green Paper on housing. However, the real-world environment has changed far more dramatically since the Green Paper was published, and its aspirations now appear unnecessary, unrealistic and unachievable. Since the RSS EiP the housing market has begun to decline, and according to Rightmove, a network that includes most major estate agents “the excess of supply over demand is on course to worsen.” (p2, House Price Index, Rightmove, March 2008). The evidence is that reservations are tailing off, housebuilders are withdrawing permissions, and that house prices will fall by at least 10% over the next 12 months, according to Caroline Flint’s advice to the Cabinet. In October 2007 The International Monetary Fund (IMF) estimated that house prices in Britain were overvalued by 40%, suggesting the potential for a far more significant market correction. In such an environment it would be unwise, unrealistic and unnecessary to plan for a massive increase in housebuilding. The proposed increases in total provision in options A2 and A3 are predicated on the assumption that</p>		

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		<p>the forthcoming NHPAU advice will have some real bearing on “the level of housebuilding required to stabilise housing affordability”. However, the behaviour of the markets over recent months, and projections for future market activity, strongly indicate that the supply of housing (and of land for housing) has only a very marginal impact on housing markets and affordability. Increasing supply to improve affordability is a wasteful, inefficient and ineffective policy choice, with very significant negative sustainability implications. Demand and not supply is the main driver of affordability. The planning system is an appropriate vehicle for delivering affordable housing, but not to control affordability. It has never been used so in the past, for the simple reason that it will not work. Taking either option A2 or A3 may though have significant negative consequences, in terms of oversupply, blight, shifting of investment and development away from areas in need of regeneration, environmental degradation leading to reduced quality of life, poorer local and regional image leading to the North West becoming a less attractive place for people to live, work, study, visit and invest, and so on, while inevitably failing to achieve its aim. The recent NWRA research on housing and economic growth also concludes that demand for housing is a far more significant factor in influencing housing markets – and therefore affordability - than supply (executive summary, para 44). The market is adjusting to changes in demand and in doing so is having a far greater impact on affordability than any supply-side policy could ever have. CPRE have produced a report analysing the causes and influences on the affordability crisis, “Planning for housing affordability” (July 2007). This is available at http://www.cpre.org.uk/library/results/housing-and-urban-policy and should be taken into consideration as part of the evidence base informing decisions on housing provision; a hard copy will also be forwarded. There is no evidence whatsoever that a lack of housing is constraining the region’s economy – this is again supported by recent NWRA research. Given the current change in trajectory of the housing market, it would be better to take a precautionary (in terms of economic, social and environmental impacts) and realistic approach to policy development. If any new evidence emerges over the next five or so years (by which time the new SRS may be ready for review) that there is a need for increased levels of provision, and that such a level can be achieved without significant negative environmental and regeneration impacts, then provision can be reconsidered in line with a plan-monitor-manage approach. At present</p>		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		<p>there is clearly no need, justification, or likelihood of achieving provision substantially higher than this option. To quote the RSS Panel report:- "6.50 ...the maximum figures cited will not impose a rigid constraint on provision in the immediate future. We would expect the RSS to be reviewed long before 2021. If there is a danger that the retention of the maximum figures would unnecessarily constrain the provision of housing to meet identified requirements, that matter can be considered at the review." Even if it were argued that growing the region's economy required a significant increase in housing provision, which is not the conclusion of NWRA's study into housing and the economy, as that study recognises, "it does not follow that future forecasts of economic need should necessarily drive policy at the margins. Economic forecasts are only one element in the decision making process about the volume, type, location etc. of new housing which the region needs." (exec summary, para 46). The study also recognizes that, even through the lens of economic growth policy, far greater emphasis should be placed on renewing and improving existing stock, in terms of environmental sustainability, livability, and image/attractiveness. Particularly given the current uncertainty and difficulties with the national housing market, there is a significant risk that developers will focus investment solely in "honeypot" areas, which will remain profitable in the medium term even if there is a significant downturn in the housing market, to the detriment of areas in need of regeneration. Increased headline numbers across the region may therefore be delivered, with some areas building far more than their target provision, while other areas that are most in need of new development lag behind. This will contribute to further unbalancing housing markets in areas of both high and low demand, and increasing regional disparities. The question of capacity to accommodate any growth points within overall levels of provision should be tackled when there is more certainty as to which growth point bids are likely to be taken forwards. However, in the Secretary of State's proposed changes to RSS, it was made clear that the targets for housing provision should be considered as floors, not ceilings, and therefore there is already sufficient flexibility to accommodate any growth points with the existing level of provision. While CPRE strongly objects to housing targets being taken as minimums not maximums, if that is to be the case, then there can be no possible argument that higher level of provision are necessary to accommodate growth points. This option is based on evidence tested at the recent EIP; other options are</p>		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		<p>untested in any way. However, even the evidence tested at the recent EiP only considered housebuilding at this rate up until 2021. Rolling forward the average annual rate for a further 11 years will have a very significant impact and this will need to be assessed by the partial Review, whichever option is taken forward. The existing distribution should be retained because changing the distribution by Housing market Area / local authority will: a) deviate from the agreed broad spatial framework for the region, b) not necessarily result in any greater housing provision in rural areas c) not necessarily result in greater numbers of affordable housing in rural areas, which is what both the main recommendations of the ARHC and the CRC required. Allocating more housing to, say, the Central Lancashire City Region, is more likely to lead to more housing being delivered in Burnley, Blackpool, Blackburn and Preston than in the rural areas, which could well be to the detriment of the Housing Market Renewal Pathfinders and other areas in need of renewal and regeneration. The question of housing in rural areas, and rural affordable housing in particular, is much better dealt with through the mechanisms suggested in Option C. There are already sufficient and appropriate levels of provision allocated to the local authorities that contain rural settlements; it is the distribution of housing (and affordable housing in particular) within those authorities that needs to be examined more closely. This option does not operate at a fine enough grain to enable this.</p>		
Cumbria County Council	Yes			
J10 Planning	No	Does not reflect the NHPAU advice		
Cumbria County Council / Cumbria Strategic Partnership	No	<p>As a general point of concern, all the Options conflate Cumbria and North Lancashire into one Sub-Region, which is not considered appropriate, given that Cumbria wishes to see separate and clearly defined housing figures for the county. It is also very difficult to make realistic responses to projected levels of new housing as far ahead as 2032, based on unknown factors and very broad assumptions. It is not clear under Option A1.1 that the figure of 2,196 for Cumbria and North Lancashire should necessarily mean that Cumbria would retain the current Proposed Changes to RSS figure (currently 1,796 for Cumbria and 400 for Lancaster = 2,196).</p> <p>The Proposed Changes to RSS, which identifies an annualised housing requirement of 1,796 dwelling units for Cumbria was based on sound evidence, as presented at the</p>		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		<p>time of the Examination-In-Public held in late 2006/early 2007. Whilst the proposed annual housing requirement of 1,796 dwelling units would represent a 53.5% increase in the level of new homes proposed for Cumbria, (compared against current adopted Cumbria and Lake District Joint Structure Plan levels, which requires the provision of 1,170 new dwellings per year), there is also a need to take account of future economic and social aspirations for the county.</p> <p>Consequently, whilst the Proposed Changes to RSS reflect the current position, there is a need for greater flexibility in the future for delivering greater housing growth in the county to support economic and social aspirations as well as identified housing needs, especially within West Cumbria. For example, the Energy Coast master plan for West Cumbria suggests that there should be around 5,500 additional new dwellings over and above current Proposed Changes to RSS up to 2026.</p> <p>The proportions identified for each District will therefore need to reflect Cumbria's future aspirations within each District, and therefore the existing proportions will not be appropriate to future local circumstances.</p> <p>On the basis of the current proportions, the Proposed Changes to RSS (March 2008) distributes the annual housing requirement amongst the Districts in Cumbria as follows: Allerdale - 267; Barrow – 150; Copeland – 230; Eden – 239; SLDC – 400; LDNPA – 60; and Carlisle – 450 units (total 1,796). Data held by Cumbria County Council shows that previous historic 10-year (1996-2005) average annual rate of dwelling completions in Cumbria were: Allerdale – 222; Barrow – 110; Copeland – 205; Eden – 223; SLDC – 328; LDNPA – 131; and Carlisle – 393 dwelling units.</p> <p>The District Councils in Cumbria, the LDNPA and the County Council are currently carrying out a Strategic Housing Market Assessment (SHMA) for the whole of Cumbria, which will take into account future economic aspirations, as well as better reflect identified local (affordable and open market) housing needs. The approach being taken in the preparation of the Cumbria SHMA incorporates an assessment of demographic change and household formation. This is considered to be a critical aspect in determining future housing needs. This needs assessment should be supplemented with an assessment of the local affordable housing requirement as well as consideration of future growth aspirations with the overall aim of producing a single figure covering</p>		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		<p>these aspects.</p> <p>It is anticipated that this new SHMA evidence base should be completed towards the end of 2008, to feed into the formal Partial Review of RSS consultation, which is expected to take place in April 2009.</p> <p>At this stage, it is considered in the short term only that the Proposed Changes to RSS gives sufficient flexibility for Cumbria to increase levels of new housing to meet economic needs as well as specific needs identified through the Cumbria wide Housing Needs Survey carried out in 2006 to support the Cumbria Housing Strategy 2006. However, it is expected that these levels of housing and the proportionate split between Districts is likely to change, having been informed by the Cumbria SHMA.</p>		
<p><i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.</p>	<p>No</p>	<p>We do not agree with this option. The North West Plan (NWP) (currently in Proposed Changes format) does not take into account changes in Government policy on housing provision, which was set out by the Prime Minister in his speech on the Legislative Programme made to Parliament on 11 July 2007. He proposed that the annual rate of housing building in England should rise from 200,000 to 240,000 dwellings net of clearance by 2016. This has been followed up by the 'Homes for the Future: More affordable, more sustainable' Housing Green Paper published by the Department for Communities and Local Government in October 2007.</p> <p>Based on the North West's share of housing delivery (approximately 11.5%), this equates to approximately 4,622 new dwellings per annum over and above the 23,111 dwellings which is set out in the NWP. We consider that this should, at the very least, the level of housing provision set out in the partial review of the NWP.</p> <p>Furthermore, the National Housing and Planning Advice Unit (NHPAU), an independent Government advisor on the housing delivery, published its final report titled 'Meeting the Housing Requirements of an Aspiring and Growing Nation' on 26 June 2008. It shows in Table 11 that in order to address the backlog in housing in the North West, some 29,500 dwellings per annum would be needed between 2008 and 2026 (which would equate to 27.6% more dwellings per year over and above that already proposed in the NWP).</p> <p>It is clear from both the Prime Minister and the Government's independent advisor that housing provision cannot remain at the current proposed levels if the Government</p>		

Organisation:	1.1. Do you agree with Housing Option A1.1?	1.1a. If so why?	1.1b. If not, why not?	1.1c. Please explain your answer to the previous question.
		<p>policy is to be met.</p> <p>Separately, we do not consider that the distribution of housing provision within the North West is correct either. The current distribution does not correctly reflect population, and therefore likely need. Current information taken from Nomis web (http://www.nomisweb.co.uk) shows that whilst Greater Manchester City Region represents some 44.1% of the population in the North West, the NWP allows for 47% of the new dwellings to be provided in that region. Liverpool City region also has been allocated more dwellings than its share of the population. However, the Central Lancashire City Region is allocated some 2% less than its proportion of dwellings in the NWP.</p> <p>In terms of total employee jobs (which excludes, for example, armed forces employees, who have their housing already provided for by the armed forces), again taking data available from Nomis web, Greater Manchester region only has 46% of the employment, but is given 47% of the overall provision of housing. Liverpool City region have been allocated the same number of dwellings as its share of employee jobs, but Central Lancashire City Region has been allocated some 1% lower dwellings than its proportion of total employee jobs.</p> <p>We therefore request the percentage of dwellings in each sub-region to, at the very least, be redistributed to better reflect the distribution of population and jobs. However, we would go even further to state that because affordability issues are greater in prosperous areas, such as Chorley Borough and South Ribble District, this redistribution should allocate a greater number of dwellings to Central Lancashire than Greater Manchester or Greater Liverpool (pro rata to population) to address these affordability issues.</p>		
Crewe and Nantwich Borough Council	No	<p>The NWRA considers that should this option be pursued, there is a considerable risk that the figures would be increased in the later stages of the Partial Review, which would not allow full consideration of all the implications of the revised figures.</p>		

2. What other policy changes are required to RSS to deliver this option and why?

The table below shows the verbatim comments received. We have removed 33 blank responses.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
Campaign to Protect Rural England, Chester District.	The RSS Panel was very clear that the RSS figures should be considered MAXIMA. No new evidence has come forward since figures were agreed through an extensive process of discussion and evidence gathering at the Examination In Public and the Panel's report. Re-distribution of figures for the new West Cheshire should now be considered particularly a reduced figure for Chester District in the light of neighbouring area doubled housing figures for the Wirral in line with the Panel's recommendations and agreed by the Secretary of State's Proposed Changes.
Environment Agency	The Environment Agency has commented on the proposed changes to RSS. In some instances we suggested changes to improve the environmental sustainability of the plan. These changes aside, the Environment Agency feels that until 2021 this option can probably be delivered with little or no changes to other policies within RSS. The policy impacts of growth beyond 2021 will, however, need to be considered. Will the positive mitigation and avoidance policies we've already got within RSS be sufficient (particularly the ones around more joined up planning of development and water infrastructure). The Environment Agency would wish to be involved in considering the implications of option A1.1 on the wider policy framework. We'd see this as forming an integral part of our input into helping assess the wider capacity and sustainability issues of accommodating higher levels of growth.
Lancashire CPRE	There are no policies which the RSS can adopt to make this option deliverable, as the requirements for this include: Falling oil prices Rising economic activity A resolution to the "Credit Crunch" None of these are within the power of the NWRA to deliver.
Bartonwillmore on behalf of Paycause Ltd	Our client objects to this.
National Trust	Need to ensure that development is phased so that the pressing needs, e.g. for regeneration, to meet previously developed land targets and for affordable housing, are met first.
Blackpool Council	The removal of the 'maxima' figures as part of current RSS provides flexibility to support future growth, but Blackpool shares the concerns of others that in the context of significantly increased housing market figures this approach runs counter to the proper planning of development priorities across the North West Region. The whole basis of Policy RDF 1 "Spatial Priorities" is to focus economic growth and development on the most sustainable locations – with the first identified priority being the regional centres, then the areas surrounding them and, thirdly, the other listed towns and cities including Blackpool/ Preston etc. These priorities fully reflect

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	<p>that it is the main conurbations where the jobs, higher education, transport infrastructure, and supporting facilities are all concentrated. They are also the focus to maximise sustainable brownfield The removal of the 'maxima' figures as part of current RSS provides flexibility to support future growth, but Blackpool shares the concerns of others that in the context of significantly increased housing market figures this approach runs counter to the proper planning of development priorities across the North West Region. The whole basis of Policy RDF 1 "Spatial Priorities" is to focus economic growth and development on the most sustainable locations – with the first identified priority being the regional centres, then the areas surrounding them and, thirdly, the other listed towns and cities including Blackpool/ Preston etc. These priorities fully reflect that it is the main conurbations where the jobs, higher education, transport infrastructure, and supporting facilities are all concentrated. They are also the focus to maximise sustainable brownfield development, and of areas in need of regeneration and housing market renewal. The danger is that this balanced basic spatial focus of NWRSS will be undermined by annual higher market growth coming forward in popular rural locations - where there is strong but less sustainable migrant, commuter and retirement market demand – and at the same time undermine delivery of urban sites. There seems a fundamental contradiction between the proper planning of NWRSS as part of an informed balanced process, and the removal of the ceiling on the figures</p>
West Midlands Regional Assembly	<p>NORTH WEST PLAN PARTIAL REVIEW OPTIONS FOR CONSULTATION The following is the response from the West Midlands RPB to the consultation options presented as the first stage of the partial review on the North West plan. The response has concentrated on those matters of shared interest rather than seeking to provide a detailed answer to the questions in the options document. Housing Options Decisions regarding the overall level of provision and its spatial distribution should support and not undermine the urban renaissance objectives of the spatial strategy in adjoining regions.</p>
Lancashire County Council	<p>It is noted in Section 1 that, pending completion of the evidence base, the proportions in the alternative spatial distribution are indicative. I am unable to offer a full assessment of the Options until the evidence base is completed. in these circumstances there should be a further opportunity to comment.</p>
Sustainable Neighbourhoods Pool Manchester	<p>Although this option doesn't fall within the range suggested by the NHPAU it might allow for a targeting of derelict and/or long term voids to be brought back into use , which would be beneficial to communities suffering from high levels of unoccupied housing and the knock-on effects to society that such property can bring. The range of provision suggested by the NHPAU is between 700-800k by 2032. This seems an astronomic figure and perhaps if the onus remains for an increase in owner occupation (which is a particularly British aspiration and unlike the continent) perhaps more should be done to limit the amount of by-to-let property owner by individuals and return those properties to the open market for owner occupation; thus satisfying the demand. While this option doesn't meet the range suggested by NHPAU there seems little evidence to suggest that there are</p>

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
Manchester Disabled People's Access Group	Need to map all housing/accommodation accessible for disabled people, older people and support for people coming out of NHS hospital care. Currently, there is not enough information from the social and private housing sectors and not enough encouragement for developers to design accessible housing, including housing able to be adapted. Currently, Decent Homes and Lifetime Homes standards are not sufficiently robust in their requirements to affect new and refurbished housing stock to meet needs. This information needs to be included in the assessment of mainstream policies on affordable and quality housing.
Haslington Parish Council	Need to ensure existing Green Gaps and Green Belts are protected and potentially expanded – in order to preserve the character of local areas e.g. between Crewe and surrounding villages such as Haslington. Smaller villages and communities do not have facilities available to support increased populations – and are unlikely to gain local access to new education and medical facilities with the current drive to reduce the number of local schools and development of large central medical centres leading to closure of existing local community based facilities.
Stockport Metropolitan Borough Council	RSS should seek to surpass the national targets for achieving the C4SH - use of tools such as our local Checklist and the regional Checklist can help inform decisions on where and how to develop housing - if used at a sufficiently early stage. Sustainable Development can be a tool to prioritising sites for housing development and enabling policy design that achieves housing and climate change targets. C4SH does not address the issue of housing development being located close to existing public transport provision and therefore the RSS should address this as a priority in order for LDFs to be able to embed it at a local level. There are clear economic, social and environmental benefits (particularly with regard to affordable housing) in locating housing development next to or close to existing public transport, employment sectors and cycling/ services provision. Another issue for consideration is the promotion of stakeholder engagement across sectors to ensure that housing developments away from existing public transport, could include discussion and negotiation to create new public transport provision and links.
North West Environment Link	This option, as a maximum, should be able to be delivered without other substantial policy changes. However, the increases proposed in the higher housing number options are so large that they would have fundamental implications for a wide range of existing RSS policies (transport/infrastructure/climate change/ environmental protection etc) most of which are not included in this partial review, and which could not therefore be implemented before these options were. The higher number options would require a review of transport infrastructure, and given the Environment Agency's concerns over the impact of even Option A1 on environmental infrastructure, would also require a rigorous review whether existing policies are robust enough to deal with the increased pressure on waste, water supply and waste water treatment provision. The recommendations on mitigation/designated areas in RSS arising out of the Habitats Regulations Appropriate Assessment were based, among other things, on the level of housing provision recommended by the Panel. Given the extent of the proposed increases in options A2 and A3, with implications for such matters as water

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	abstraction to service new housing, it might be necessary to revisit the Appropriate Assesemnt and impose rigorous new safeguards for designated sites.
satnam planning services ltd	not applicable
Environment-agency.gov.uk	The Environment Agency has commented on the proposed changes to RSS. In some instances we suggested changes to improve the environmental sustainability of the plan. These changes aside, the Environment Agency feels that until 2021 this option can probably be delivered with little or no changes to other policies within RSS. The policy impacts of growth beyond 2021 will, however, need to be considered. Will the positive mitigation and avoidance policies we've already got within RSS be sufficient (particularly the ones around more joined up planning of development and water infrastructure). The Environment Agency would wish to be involved in considering the implications of option A1.1 on the wider policy framework. We'd see this as forming and integral part of our input into helping assess the wider capacity and sustainability issues of accommodating higher levels of growth.
Liverpool City Council	As referred to above, this is the Option which has been tested via EIP and as such, little policy change would be required to deliver it. it is recognised however, that this option would not necessarily comply with Government housing policy which emerged after the EIP, notably the Housing Green paper which set out Government aspirations for higher housing growth. Also, it may not necessarily support the Council's joint "bid" with Wirral for a New Growth Point
Lambert Smith Hampton	No policies would need to be changed as this is the do nothing approach.
Pioneer Property Services	Review of environmental capacity and infrastructure needs required, but these could be addressed within emerging Community Infrastructure Levy strategies and policies.
Emerson Group	No change if this was a serious option which history dictates it should not be.
LDNPA	No changes required. The figures in RSS are set as a minimum, which ensures flexibility to enable the annual target to be exceeded. Recognition of the importance of local needs surveys as a robust source of evidence needs to be made clear in RSS, rather than the reliance on SHMAs.
Taylor Young Ltd	The spatial distribution should be reconsidered, for example increased in Cumbria, North Lancs and South Cheshire, as the figures predict current need in these areas yet not projected need.
Allerdale Borough Council	The processes for delivery of affordable housing are inadequate to meet the need. This is not perhaps the remit of RSS, but if these figures are carried forward the timescales for delivering affordable housing would have to be lengthened in order to reduce Percentage quotas to a level that does not threaten the viability of most housing

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	development.
Upper Eden Community Plan Group	The housing allocation for Eden should be increased to a figure over 300 units per year. Further refinement and encouragement could be made to make more explicit the acceptability of a limited allocation of housing to all communities.
Pendle Borough Council	A higher housing figure for Pendle could be achieved by changing the percentage split between authorities within the Central Lancashire City Region or by increasing the overall figure for the Central Lancashire City Region.
AGMA (the Association of Greater Manchester Authorities)	See response to 1c
NW Transport Roundtable	The modifications/ changes stage of the RSS due to be published this Summer (2008) proposed no ceiling figures for housing. This is an irresponsible proposition on the part of national and regional government in terms of environmental capacity.
Cheshire East Council	Robust SHMA and SHLA studies required. More consultation on housing /population projections required Also there is a need for RSS to recognise Cheshire East, at the moment housing figures for macclesfield and Congleton are hidden in the total for the Manchester city region
Lancaster City Council	none
CPRE North West	This option can be delivered without other substantial policy changes. It is very difficult to see how any of the other options could be delivered without substantial changes, most of which are not to be considered through this partial review, and which could not therefore be implemented before these options were. For example, any other option would require a review of transport infrastructure, as such significant increases in housebuilding would have obvious – but untested – impacts on road and public transport networks. The Environment Agency had significant concerns as to whether the level of provision in this option would put excessive and unacceptable strain on environmental infrastructure, eg water supply and waste water treatment. The impact of any higher level of provision would certainly do so, but to an extent that has not been tested. Policies for employment land and locations would also need reviewing, in order to avoid breaching most if not all of the spatial principles on which RSS is based by failing to ensure that people have access by sustainable means to jobs, preferably local ones. Given the acknowledged environmental impacts that housing has, such significant increases would require a review of the policies dealing with environmental protection, mitigation and enhancement, with a particular focus on whether they are robust enough to cope with these increases.
J10 Planning	Growth points, green belt review and acceptance that without a restrictive ceiling housing targets shall still not

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	be met due to delays in planning and market cycles.
Cumbria County Council / Cumbria Strategic Partnership	It is considered that increased levels of Government funding via the Housing Corporation and simpler processes are needed to deliver the identified affordable housing needs identified across the County, which have been measured to be 1,299 units per year over five years (2006- 2011).
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	We do not support this option and therefore cannot comment on policy changes which may be required for this.

3. In taking forward this option, what are the implications for:

The table below shows the verbatim comments received. We have removed 26 blank responses.

Organisation:	3. In taking forward this option, what are the implications for:
Macclesfield Borough Council	<p>A) Delivery: There was significant doubt that 400 additional dwellings per year could be accommodated within the borough without incursions into the Green Belt. However, the Council and the Macclesfield Strategic Housing Market Partnership have recently carried out work assessing the potential to accommodate this number. We have recently consulted on a draft Strategic Housing Land Availability Assessment. Whilst not yet finalised, the assessment indicates that it will be very challenging, but possible to accommodate 400 dwellings per year and the additional backlog due to the backdating of figures to 2003. Recent guidance from Government Office indicates that the backlog would need to be made-up in the first five years, which results in a requirement for 486 net additional dwellings per annum during this period. Until recently, Macclesfield had a restrictive housing policy in place as a result of the Cheshire Structure Plan housing requirements for the Borough. Although significant numbers of permissions were granted under the restrictive policy, the numbers granted were less than would otherwise have been expected. As a result, the bank of outstanding permissions is diminished in size and meeting the backlog on the first five years will be very challenging.</p> <p>In considering the sites that would be required to deliver these housing market numbers, the Strategic Housing Land Availability Assessment relies heavily on developing a number of sites that</p>

Organisation:	3. In taking forward this option, what are the implications for:
	are currently in other uses, including employment sites, retail units, schools sites, car parks, hospital land, infill sites and by redevelopment of existing large housing plots to increase the density. It also requires that a significant proportion of new development be for flats and apartments to achieve the number required. If market conditions continue to deteriorate, it is likely that this reliance on flats would need to be reduced in order to ensure delivery of new housing. Whilst the SHLAA is currently in draft form, consultation has now ended and the final figures will be published in September.
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? The draft SHLAA indicates that it will be challenging but possible to accommodate this level of housing provision without incursions into the Green Belt.
	E) Economy? The draft SHLAA indicates that a number of existing employment sites may be required to deliver this level of housing provision.
Individuals	A) Delivery: The priorities for housing should be regeneration and affordability, with emphasis on rented housing delivered by housing associations. One of the problems of this Region is that much of it was designed around the motorways and is car-based. Rented housing would support worker mobility.
	B) Infrastructure provision? Many areas will have reached the limits of their existing infrastructure and this should be considered.
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Northwest Regional Development Agency	A) Delivery: Targets for the re-use of previously developed land The Options paper refers to the fact that existing RSS and draft RSS contain targets for the amount of residential development on previously developed land (PDL), noting that Partial Review is likely to require a target for the region as a whole to be 'at least 70%'. We would question whether the evidence exists to support this target, given that the Options paper states that amendments may be required in light of emerging evidence from Strategic Housing Land Availability Assessments currently being completed across the region, NLUD and the Register of Surplus Public Sector Land. Further, the options paper states that any PDL target will need to be informed by the agreed final level of

Organisation:	3. In taking forward this option, what are the implications for:
	housing provision. We would therefore suggest that at this stage, any targets are premature.
	B) Infrastructure provision? -
	C) Community and social issues? Social implications Whilst the section considering the social implications of housing issues describes some of the consequences of housing market affordability it would be useful, to specifically refer to 'affordable housing' so that consultees are able to clearly understand the issue being considered. We note that the social implications of affordability largely focus upon discussion around investment in housing and buy to let with the implication that this phenomenon alone has fuelled the increase in property prices resulting in the affordability gap. A recent NHPAU publication examined this issue, concluding that whilst buy to let has made a small contribution to house price inflation in recent years, rising incomes, low and stable interest rates, household growth and limited housing supply are much more important factors. For a wider discussion on the social implications arising from the lack of available affordable market housing, we would refer you to further publications by NHPAU . Social implications of note include more people locked out of homeownership, a delay in household formation, an increase in demand for housing support from the state and increased pressure on existing social housing, an increase in the proportion of households in the private rented sector, an increase in overcrowding and households living in temporary accommodation and a concentration of wealth amongst owner occupiers with younger age groups losing out relative to older age groups. These we suggest, are the real social consequences and implications of over constraining housing provision.
	D) Environment? Promoting environmental quality We note that the paper refers to the fact that sustainable development 'demands' that we live within environmental limits (p. 6). We feel that this is a somewhat narrow interpretation, noting the UK Government's sustainable development strategy which refers to living within environmental limits alongside ensuring a strong, healthy and just society, promoting good governance and using sound science responsibly. The options paper should note that sustainable development involves achieving a balance between these aspects.
	E) Economy? -
Environment Agency	A) Delivery: Out of all the options, this one that is most likely to be deliverable. However, in delivering it, the implementation of various policies within RSS will be essential (particularly EM5). This may be challenging for the region. We would welcome involvement into any revision of the RSS implementation plan to ensure all those responsible for implementation are identified and ways of measuring successful delivery are put in place.

Organisation:	3. In taking forward this option, what are the implications for:
	<p>B) Infrastructure provision? Out of all the options, certainly up to 2021, this option is the one likely to have the lowest impacts on infrastructure provision. However, at the RSS EiP the Environment Agency still concluded that accommodating even 416,000 new homes would be challenging, especially if spatial and infrastructure planning were not carried out in a more integrated fashion.</p> <p>C) Community and social issues? N/C</p> <p>D) Environment? As stated previously, we can probably conclude that the do nothing option can be accommodated sustainably and its environmental impacts managed. Consideration needs to be given to the impacts of growth beyond 2021 and we would welcome the opportunity to be involved in this.</p> <p>E) Economy? N/C</p>
Lancashire CPRE	<p>A) Delivery: The only hope of local authorities for the building of new housing lies in the National Housing Corporation providing the money for new affordable housing on land owned by the council. This view came across strongly in the housing workshop. And, if this happens, it will prevent building companies going into receivership and the unemployment which this will cause.</p> <p>B) Infrastructure provision? It was previously envisaged, in the new Planning Reform Bill, that developers building housing in a rising market would pay for infrastructure through a planning gain supplement secured for the local authority by the use of Section 106 agreements (Planning Obligations). However, the need for new infrastructure will be reduced if very few housing developments go ahead.</p> <p>C) Community and social issues? There are currently 1.5 million people/ families on council waiting lists (national figure) To this list must be added many of those displaced from their homes by the Pathfinder Housing Market Renewal process. Left with compensation inadequate to purchase new housing, many of them are living in appalling privately rented accommodation. Around 10,000 homes have been demolished nationally to provide new sites for development but only 1,000 replacement homes have been built to date.(again national figures) To the above figure must be added those who bought houses with low interest, fixed term mortgages between 2003 and 2008. When the fixed term (usually five years) expires, they will be forced to renew their mortgage on higher interest rates and, if the value of their house has fallen, to fund the gap between the existing debt and the new value of their house. In a period of rising unemployment, this situation may see many of those people join the council waiting list. Estimates put the eventual total council waiting list figure at 4 million for whom no provision has been made, either</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>in Regional Spatial Strategies or elsewhere.</p> <p>D) Environment? There are currently 1.5 million people/ families on council waiting lists (national figure) To this list must be added many of those displaced from their homes by the Pathfinder Housing Market Renewal process. Left with compensation inadequate to purchase new housing, many of them are living in appalling privately rented accommodation. Around 10,000 homes have been demolished nationally to provide new sites for development but only 1,000 replacement homes have been built to date.(again national figures) To the above figure must be added those who bought houses with low interest, fixed term mortgages between 2003 and 2008. When the fixed term (usually five years) expires, they will be forced to renew their mortgage on higher interest rates and, if the value of their house has fallen, to fund the gap between the existing debt and the new value of their house. In a period of rising unemployment, this situation may see many of those people join the council waiting list. Estimates put the eventual total council waiting list figure at 4 million for whom no provision has been made, either in Regional Spatial Strategies or elsewhere. There is also a problem with the housing targets for rural areas where many rural villages are very small and would be swamped by the level of house-building projected in the R.S.S. It should, therefore, be left to local councils discretion to decide the level of house-building appropriate to these areas, since land in rural villages is like Green Belt more attractive to developers than urban land There is a further reason why there should be no housing targets for rural villages which relates to the fact that house prices have risen higher there than anywhere else as the Govt has acknowledge These higher prices have been the result of the Buy to Let and second Homes market where house purchases have been used as investment vehicles .As house prices fall many of these houses will come back onto the market at much lower prices as investors cut their losses ,having realised that they should have put their money into oil instead of houses. Some provision should be made (by whom I do not know) to buy back these houses and make them available to supply local housing need , rather than building unnecessary new housing.</p> <p>E) Economy? Since the 1960s house prices have been the main driver of the British economy, with rising prices funding every boom and falling house prices precipitating every economic downturn. The mechanism for this is "mortgage leakage", that is, by rising equity being used to fund other purchases rather than being used to reduce mortgage debt The fall in house prices projected by the IMF (40%) will therefore have a disastrous effect on all other areas of the economy.</p>
Bartonwillmore (on behalf of Paycause)	<p>A) Delivery: Our client objects to this.</p> <p>B) Infrastructure provision? Our client objects to this.</p>

Organisation:	3. In taking forward this option, what are the implications for:
<i>Ltd)</i>	C) Community and social issues? Our client objects to this.
	D) Environment? Our client objects to this.
	E) Economy? Our client objects to this.
National Trust	A) Delivery: See answer to 1a) above – even at this level there are question marks over the capacity of the construction industry to build to this extent, especially in the short term.
	B) Infrastructure provision? It will be important to ensure that high sustainability standards are met in order to reduce pressure upon infrastructure and meet more needs on site, e.g. in terms of high energy efficiency, on site renewables (especially for medium to large scale developments), minimisation of water use and grey water recycling, waste minimisation and recycling.
	C) Community and social issues? No specific comments.
	<p>D) Environment? Environmental capacity issues will still arise with this level of potential development, not just in terms of the capacity of utilities but also in terms of the impacts upon landscapes, the historic environment and nature conservation.</p> <ul style="list-style-type: none"> • It will be increasingly important to ensure that new development is assessed in terms of its impact upon landscape character and the capacity of landscapes to accept change; • Opportunities need to be identified to secure enhancement of the historic environment through regeneration, whilst ensuring that valued assets, including their wider settings, are safeguarded and improved; • Development needs to ensure that it makes a positive impact upon bio-diversity both in terms of safeguarding and enhancing existing resources and providing new habitats – it is especially important that wildlife corridors are maintained and extended so as to provide better foraging areas and to enable species to migrate. The assessment and determination of new development proposals will be one of the key opportunities to ensure that other major initiatives are achieved across the Region as set out in the key Regional Strategies in respect of Climate Change and Green Infrastructure.
	E) Economy? It will be important to ensure that related development, e.g. allocation of employment sites, provision of commercial facilities, will be secured in an integrated approach along with the regeneration of major housing areas and where urban extensions are proposed.
Blackpool Council	A) Delivery: The implication of the current downturn is that there is clearly uncertainty over

Organisation:	3. In taking forward this option, what are the implications for:
	<p>development rates matching those proposed in the short term whichever option is chosen. Options would be more realistically represented as an annual rate of development that should be achieved and then maintained over the plan period rather than it being assumed that the levels quoted can be achieved as an average over the 25 year period. Whichever option is proposed it is suggested that figures represent a ceiling generally across the Region, but with no ceiling in the housing growth point/ priority locations. This would be an obvious way of boosting housing delivery in a way fully consistent with NWRSS spatial priorities, rather than undermining them</p>
	<p>B) Infrastructure provision? Planning ahead by looking to 2032 is implicit in all options, with the need for infrastructure assessments to take a longer term view. On this basis, it is not considered the implications for infrastructure are a major issue. The need is to plan ahead for long term growth. Changes in the housing market may impact on the time-spans - but should not impact on proper forward planning</p>
	<p>C) Community and social issues? A key consideration is the need for new affordable housing. Provision will be undermined by lower overall levels of housing although an increase in the housing figure will make no difference, unless the market can sustain housing growth. Social housing provision may be less affected by the current downturn, but it will have a major impact on Section 106 delivery. However, a national housing market correction, once house prices stop falling, will re-ignite the lower end of the housing market, with improved affordability within the existing stock potentially having a more positive impact in the immediate future than the scale of new build affordable housing that can be delivered.</p>
	<p>D) Environment? The focus of growth on the main conurbations, cities and large towns such as Blackpool is fully supported. It is a fundamental planning principle that the scale and distribution of proposed growth is consistent with the sustainable capacity of areas to accommodate it. This is what Policy RDF1 seeks to do. However, in practise, when the figures are spelt out in NWRSS at district level, it is evident that the figures for many rural authorities already imply much higher levels of growth than is planned for many of the North West's towns and cities. The increasing potential to 'work from home', commute, and for early retirement, combined with their natural attractiveness as a place to live are placing more development pressure on more rural locations- but runs directly counter to sustainable development principles, threatens the countryside, and to undermine the levels of growth and regeneration in areas which most need it.</p>
	<p>E) Economy? The main Policy RDF1 priority locations are where infrastructure and supporting facilities are concentrated, and where brownfield opportunities and regeneration needs are highest. Most professional, commercial, major industrial and service sector jobs are located in the</p>

Organisation:	3. In taking forward this option, what are the implications for:
	main urban centres. The housing requirement figure needs to complement and be consistent with this. The distribution of housing must be directed to locations which support the sustainable development and regeneration of the economies of the main towns and cities. The focus of housing and jobs elsewhere should be to meet local needs, not create them.
West Midlands Regional Assembly	<p>A) Delivery: -</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? The current phase 2 revision of the West Midlands RSS is seeking to introduce a phasing mechanism with respect to the release of housing development. This approach is seeking to reconcile the potential conflicts which arise from meeting the agenda of Central Government for ever higher levels of general housing provision with the desire to support the operation of Renew through adopting a measured approach to the release of sites which would reinforce established patterns of out-migration from the conurbation. It is suggested that the North West Regional Assembly may wish to consider the possible merits in promoting a similar approach.</p> <p>D) Environment? -</p> <p>E) Economy? An understanding of the potential impact of promoting higher levels of housing development on the fragile North Staffordshire MUA housing market should inform decisions with respect to the level and timings of development in the South Cheshire sub-region. The options which promote higher levels of rural housing provision are of particular concern given the potential for this approach to result in an increase in the supply of housing in rural settlements peripheral to the North Staffordshire conurbation. In addition to adopting an informed approach to the level of housing provision in South Cheshire, the Regional Assembly would welcome closer harmonisation of approaches to support the urban regeneration initiatives currently being promoted in North Staffordshire.</p>
South Lakeland District Council Development Plans Team	A) Delivery: Delivery and achievability are clearly watchwords for central government. Ironic therefore that this appears to have been overlooked as part of devising realistic housing options for Cumbrian authorities. Even for the status quo option (A1:1) it is recognised that it 'may' (my emphasis) still be realistic in the short term current economic climate, casting a shadow over the viability of the other, higher targets. For South Lakeland, 400 dwellings per annum still represent a significant increase on the previous target of 265. Any higher targets are unlikely to be deliverable – particular in light of the economic uncertainties mentioned in the papers and the simultaneous targets related to the Code for Sustainable Homes. As part of preparing our Kendal

Organisation:	3. In taking forward this option, what are the implications for:
	<p>Canal Head AAP it has been very clear that that financial implications of achieving standards in the Code for Sustainable Homes can have a drastic impact on viability and ergo delivery. It is not accepted that drastically increasing the supply of housing is the most sustainable way of meeting the housing needs of rural communities. We are firmly committed to tackling affordability, and are advocating strict requirements through our LDF Core Strategy. This will help ensure that the majority of new housing in the district is affordable. Furthermore, we strongly believe that it is for local authorities as place shapers to use the Core Strategy to ensure a suitable distribution that meets the needs of rural communities. Furthermore, following the removing of ceilings from RSS, there would still be scope for local authorities to deliver housing numbers over and above the existing target where appropriate and sustainable, and for schemes which will help achieve the objectives in the Core Strategy. The National Housing and Planning Advice Unit figures would inform the decision making process as an important part of the evidence base. The recent PAS guidance on options generation and appraisal states that as RSS allocations are not intended to be ceilings, some authorities may develop options that set out higher levels of growth (using Dover as an example). This would seem a more sustainable approach, rather than imposing strict targets in the statutory development plan that cannot possibly take sufficient account of local circumstance.</p>
	<p>B) Infrastructure provision? Work on our evidence base shows that there are critical infrastructure limitations to further development, over and above the level advocated in the proposed changes to RSS.</p>
	<p>C) Community and social issues? The community has expressed significant concerns over the housing target, with a substantial number of objections to the Core Strategy preferred options report on the basis of the scale of housing growth. To impose a higher target is likely to further disenfranchise local residents who are already concerned that their viewpoints are being overlooked. It is highly unlikely that a higher level of house building to that currently proposed could be matched by higher quality employment opportunities, perpetuating high levels of out-commuting in South Lakeland, contrary to the objectives of our emerging Core Strategy.</p>
	<p>D) Environment? 400 dwellings per annum is considered to be the upper development limit for the council without seriously undermining environmental quality and prohibiting the development and maintenance of sustainable communities. Our evidence base has highlighted limited opportunities for settlements to expand without compromising the local landscape. The council expressed concern to the proposed changes to RSS over the achievability of developing at least 50% of housing on brownfield sites. The council is firmly committed to prioritising brownfield land in accordance with national and regional policy. However, emerging work on the SHLAA combined</p>

Organisation:	3. In taking forward this option, what are the implications for:
	with the annual housing required proposed suggest that it would be unrealistic to expect the council to hit this target. Needless to say that an unachievable high target places pressure for displacing industry, affecting jobs and undermining employment land supply. Developers often use failure to meet the targets as reason for redeveloping previously developed employment sites.
	E) Economy? -
Sustainable Neighbourhoods Pool Manchester	A) Delivery: -
	B) Infrastructure provision? With onus on returning derelict/long term voids/and by to let property to the housing market there is no need for extra infrastructure. It is correct to distribute new provision heaviest in large urban areas, as this will lessen the dependence on private vehicular transport to work, school and social activities and will minimise the need for extensive new sewer systems and other service infrastructures.
	C) Community and social issues? Returning empty property to owner occupation has many benefits to the community. Empty property detracts visually , socially and economically and there are correlations between empty property and anti-social behavior.
	D) Environment? By providing additional housing via returning empty and by-to-let property to the market there is little negative impact on the environment. Building in already urbanised areas reduces the need for large scale new road systems etc.
	E) Economy? -
Manchester Disabled People's Access Group	A) Delivery: 1. new design standards which incorporate best practice in accessibility, energy conservation and sustainability (see Design for Access 2 - Manchester City Council and work undertaken by our group and VCS groups involved with sustainability 2. support for innovative design with flexibility in interior space in inner city areas, to incorporate options for families as well as single people.
	B) Infrastructure provision? 1. advice and guidance for developers and local authorities 2. strategies for providing informed advice and guidance to potential tenants and residents on options, related to employment, transport, support services etc. 3. pilot projects to include collaboration between developers, local authorities, social housing, financial providers to meet needs in the current housing market where credit is limited 4. strategies to identify and make available accessible housing in each sub-region and locally within wards
	C) Community and social issues? 1. Quality of provision and environment required within each

Organisation:	3. In taking forward this option, what are the implications for:
	<p>community and to encourage mixed housing schemes, to reduce numbers moving out of neighbourhoods when single people have families or where they earn more money, and to encourage more economic and social activities in neighbourhoods</p> <p>2. Availability of accessible housing in each local neighbourhood to ensure that disabled people and older people requiring support services are able to stay in their own communities and have access to services and local facilities near to where they live.</p> <p>D) Environment? 1. housing allocation should be considered in relation to the economic plans and projections for each region, including transport, employment and sustainability, to reduce travel times and carbon emissions</p> <p>2. Better design specifications which are accessible and sustainable will improve the environment</p> <p>3. better support for the development of brownfield sites, particularly where there may be industrial pollution</p> <p>E) Economy? supporting the development of city areas will support the economic growth in these areas.</p>
Haslington Parish Council	<p>A) Delivery: Hard to justify greenfield development with the current high numbers of unsold properties on the market. Social Landlords need to be able to purchase existing properties within the open market to build up their stocks rather than imposing high levels of affordable housing on new developments.</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? Need to retain and respect the character of existing local communities, taking into account documents preferences contained in Parish Plans and similar documents.</p> <p>D) Environment? Need to ensure existing Green Gaps and Green Belts are protected and potentially expanded – in order to preserve the character of local areas e.g. between Crewe and surrounding villages such as Haslington.</p> <p>E) Economy? Need to consider cross regional influences e.g. North Staffs/Stoke on Trent having an effect on SE Cheshire.</p>
North West Environment Link	<p>A) Delivery: Given the present downturn in the housing market, option A1 should be able to be delivered without difficulty. However, planning for higher levels of housing provision is likely to result in local authorities having to allocate and release more greenfield land than is necessary under the present level of demand. this could result in cherry-picking of more profitable greenfield sites at the expense of investment in urban areas in genuine need of regeneration.</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>B) Infrastructure provision? Even Option A1 has substantial implications for infrastructure provision, as was made clear by the Environment Agency at EiP. Until the work currently being undertaken on the infrastructure demands of Option A1. by the Agency in conjunction with United Utilities and NWDA is concluded it does not make sense to consider other options that would obviously impose a significantly higher strain on waste and water infrastructure. Such pressures would have to be addressed through significant changes in other RSS policies, but, as these policies are not up for review, the necessary changes would not be possible.</p> <p>C) Community and social issues? The RSS EiP Panel were concerned that higher levels of housing provision could deflect investment away from areas in most need of regeneration, imbalancing housing markets and exacerbating the region's problems of low demand and inadequate distribution of affordable housing. It does not make sense to run the risk of these negative social and community impacts in order to try to meet national targets in the Government's housing Green Paper, unsupported by any regional evidence or research.</p> <p>D) Environment? Unless all the proposed new houses are to be zero-carbon rated (and, under current Government proposals, this will not happen before 2016) any increase in housing numbers will lead to an increase in the region's carbon emissions. Therefore, the higher the proposed increases (Options A2 and A3) the less chance the North West has of achieving a 'UK compliant' emissions reduction target by 2020. Given the considerable increases in housing provision proposed in Optiona A2 and A3 and the lack of any research into the resulting impact on the region's environment, the precautionary principle as advocated in the UK Sustainable Strategy should rule out these options.</p> <p>E) Economy? Given the downturn in the housing market and growing evidence that the problems are likely to persist for a number of years, it cannot be said that restricting housing targets to that recommended by the RSS Panel will in any way restrict economic growth in the region.</p>
RPS Planning	<p>A) Delivery: -</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? This option will not address the acute shortage of affordable housing in the areas outside the City regions such as significant parts of Cheshire.</p> <p>D) Environment? -</p> <p>E) Economy? -</p>

Organisation:	3. In taking forward this option, what are the implications for:
Satnam Planning Services Ltd	A) Delivery: Sufficient homes will not be provided and affordability will not be addressed.
	B) Infrastructure provision? Limited new infrastructure can be provided by the developments brought forward under this option.
	C) Community and social issues? Tensions, lack of choice and high housing exclusion levels will remain (including lack of affordability).
	D) Environment? High levels of commuting will continue.
	E) Economy? Inward investment and organic growth within the region will be affected to an unacceptable degree by low housing provision figures.
Liverpool City Council	A) Delivery: Already largely tested via EIP
	B) Infrastructure provision? As above
	C) Community and social issues? As above
	D) Environment? As above
	E) Economy? As above. This Option follows a clear regional spatial framework and development principles which focuses development in the city regions, and particularly their core, which are sustainable locations characterised by regeneration needs which this option help supports.
Highways Agency	A) Delivery: Supporting infrastructure (in its widest sense) needs to be delivered in a timely manner in order to ensure levels of housing provision accord with over-arching sustainability aims of RSS and other policy objectives such as economic forecasts and managing travel demand (particularly length and number of car-based trips).
	B) Infrastructure provision? An assessment of the infrastructure requirements to support this level of housing provision is needed as part of this review. To help with decision making, there would be benefit in a combined assessment of stress levels of the road and rail networks. Necessary transport improvements need to be prioritised and supported within the RFA.
	C) Community and social issues? An assessment of existing "key services" (education, health, employment, retail) should be undertaken to evaluate the sustainability of housing locations and identify additional services that maybe required to minimise the number and length of car-based trips, for example.
	D) Environment? Additional or lengthier transport trips arising from this level of housing

Organisation:	3. In taking forward this option, what are the implications for:
	provision may have implications for noise levels, air quality and environmental resources : such as landscape and bio-diversity.
	E) Economy? Growing congestion on the road network arising from an increasing number of car-based commuting trips may frustrate achievement of forecast economic growth. The opportunity to secure funds from the Community Infrastructure Level and / or Community Infrastructure Fund should be explored.
Lambert Smith Hampton	A) Delivery: Demand would always outstrip supply which would lead to an increase in house prices. The housing market would have to be changed to provide phasing. This option would perpetuate the boom and bust cycle.
	B) Infrastructure provision? Infrastructure would not be provided in terms of improvements to the living environment of the existing communities. It will not encourage investment into the area.
	C) Community and social issues? The provision of affordable housing would be detrimentally affected as would choice and flexibility in the housing market. There would be a danger of an ageing community as there would be no growth by maintaining the status quo. The demographics of the population may age with the infrastructure.
	D) Environment? Development would be skewed towards every bit of land within the Manchester and Liverpool Regions with an inappropriate density related to the infrastructure and services available, or it would lead to the expansion out of the boundaries of the City Regions which would move development away from the Central Core areas contrary to the spatial distribution objectives.
	E) Economy? Limited impact on the economy, investment would not be encouraged.
West Lancashire District Council	A) Delivery: As the SHLAA has yet to report it is not yet possible to answer this question. The market may have difficulty delivering due to the poor housing market situation and the lack of skills in the industry to provide this level of housing after many years of constraint.
	B) Infrastructure provision? The District Council is still seeking infrastructure information off key stakeholders in the District as part of its Core Strategy.
	C) Community and social issues? As the SHLAA has yet to report it is not yet possible to answer this question
	D) Environment? As the SHLAA has yet to report it is not yet possible to answer this question

Organisation:	3. In taking forward this option, what are the implications for:
	E) Economy? As the SHLAA has yet to report it is not yet possible to answer this question
Pioneer Property Services	A) Delivery: Undoubtedly capacity will have to be restored within housebuilding industry before these targets are capable of being attained.
	B) Infrastructure provision? Needs to be reviewed in context of emerging CIL policies.
	C) Community and social issues? Failure to increase housing numbers will result in added pressure on affordability.
	D) Environment? Effects can be mitigated subject to sustainability appraisal of suitable locations for further housing growth.
	E) Economy? House building sector is a major contributor to the regional economy.
Emerson Group	A) Delivery: In the short term these figures will not be achieved until the house building industry and more importantly the banking and mortgage lending institutions resolve their current problems which may take another year. Thereafter it should be possible to meet these figures.
	B) Infrastructure provision? None as these are supposedly catered for in other policies of the RSS.
	C) Community and social issues? As B) above
	D) Environment? As B) above
	E) Economy? As B) above
GVA Grimley (<i>on behalf of Goodman</i>)	A) Delivery: This option would impede delivery of required housing numbers within the North West region.
	B) Infrastructure provision? Existing infrastructure will be put under greater pressure if an increase in housing numbers is not considered at the early stages of the partial review. The full implications of the need for more housing needs to be addressed as early as possible.
	C) Community and social issues? As in section B above, if Option A1.1 is pursued then full implications of housing need will not have been taken into account and therefore community and social issues will be greater.
	D) Environment? Similarly, there will be a greater pressure on the environment if housing numbers are increased later within the partial review process (or beyond) as the full implications

Organisation:	3. In taking forward this option, what are the implications for:
	will not have been considered. For example, the percentage of development necessary on greenfield land and how this is best managed.
	E) Economy? If the partial review of RSS does not fully take account of the need for more housing this could have direct implications for the region's economic growth. Insufficient housing could lead to a position whereby the region cannot accommodate further growth in general terms.
LDNPA	A) Delivery: Strategic Housing Land Availability Assessments for the LDNP (2008) concludes that there is insufficient supply of identified sites to achieve the housing target expressed in RSS for the RSS period. We are adopting proactive approaches through the emerging LDF to secure and maintain a rolling 5 year supply. Funding from the Housing Corporation is also an issue as the grant per unit does not adequately reflect the difficulties experienced in trying to deliver housing within a National Park.
	B) Infrastructure provision? Many of the sites within the LDNP are small in scale which can be detrimental in our ability to secure the relevant infrastructure to support new schemes. We do not have the economies of scale to negotiate with infrastructure providers and this could hamper future housing supply. This should not be seen as justification to substantially raise our housing quota!
	C) Community and social issues? The lack of affordable housing in rural areas is having serious implications on community viability, i.e. loss of local service provision. In addition, it is affecting the local economy through labour shortages. Housing targets based on robust local evidence of need help to focus delivery where it is needed.
	D) Environment? Any target build figures need to respect environmental capacity and the potential impacts that new development can have on the environment both from a visual perspective and from traffic, waste, climate change, etc. Our environment is changing and we must respect that.
	E) Economy? It is hoped that new housing development in the LDNP will have a positive effect on the economy. But it has to be viewed in the context of scale and need relevant to the LDNP rather than as a means of making a significant contribution to the aspirational growth scenario across the sub-region and region.
Taylor Young Ltd	A) Delivery: This would appear the most deliverable option
	B) Infrastructure provision? Has the cost of supporting infrastructure been considered? Roads / schools / community facilities will be a huge capital cost

Organisation:	3. In taking forward this option, what are the implications for:
	<p>C) Community and social issues? This option will receive least community resistance as would be least controversial in terms of building in the green belt and putting strain on existing infrastructure.</p> <p>D) Environment? Do the figures take into account the move towards Code Level 6 Sustainable Homes? The increased development costs will obviously impact upon deliverability. Also the loss of green belt is inevitable to deliver more homes in rural areas</p> <p>E) Economy? The lower figure may be more realistic in the current economy in terms of deliverability. However, the market is going to rise and fall many more times over the 24 years to 2032.</p>
Wirral MBC	<p>A) Delivery: The delivery of up to 500 units pa in Wirral (up from 160 pa in RPG13) will rely on units to be delivered at Wirral Waters (a submitted Growth Point). The Options Consultation paper appears to assume that the contribution from Growth Points will only be included (on top) in any new (higher) figures.</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? -</p> <p>E) Economy? -</p>
Allerdale Borough Council	<p>A) Delivery: As stated above the overall figures in this option are not far from existing trend and therefore could be deliverable. However, the deliverability of affordable housing is very doubtful.</p> <p>B) Infrastructure provision? Ought not to be general infrastructure problems with this scale of housing.</p> <p>C) Community and social issues? Affordable housing issues as above.</p> <p>D) Environment? There will only be local issues which should not preclude delivery of these numbers.</p> <p>E) Economy? This option does not fully encompass the aspirations for the "Energy Coast" Masterplan Golden Scenario, despite the flexibility given by the deletion of the maximum tag, the figures can realistically only allow for modest growth. The current housing market is also a potential obstacle to delivery but shortfalls may be made up at times of housing boom.</p>

Organisation:	3. In taking forward this option, what are the implications for:
Upper Eden Community Plan Group	<p>A) Delivery: The current low housing figure encourages LPAs to set higher proportions and lower thresholds for affordable housing in an attempt to meet the affordable housing needs identified through the recent research. However, this approach runs a high risk of failing to deliver both the level of general housing and affordable housing because the release of land for housing, particularly in rural areas will be diminished. The general approach to affordable housing of seeking greater and greater contributions from developers has a lower limit on its effectiveness in rural areas than in urban ones. This is due to a number of factors including, the proportion of greenfield land potentially available, landowners historical ownership of land, local sentiment, long term (multi generational) development plans. Essentially, the ever increasing burden on landowners in their release of land for housing reduces the overall quantity of land that will come forward.</p>
	<p>B) Infrastructure provision? A reliance on fewer but larger locations for development to provide the allocation of housing in rural areas will put an increased and significant strain on existing infrastructure such as roads, water, and sewage. However, an approach that seeks to distribute a low but locally significant proportion to all communities will ease this burden. Service providers involved in health and welfare recognise the importance of retaining local kinship and informal networks in ensuring at-home delivery is effective</p>
	<p>C) Community and social issues? A low housing figure together with an exclusive allocation policy will exacerbate the affordability problems of housing in the small rural communities. This will result in increased levels of holiday and second home ownership, an increase in the level of commuting, and an increase in the number of retired people displacing locals in villages. Such events destroy the communities and social networks in small rural communities. Limited allocations for all communities properly restricted through condition and s106 agreements for local people, and those in need as appropriate, will help retain younger people in communities where they have grown up. The sustainability of the communities and the social networks to which they contribute will be retained. The effect of this on health, welfare and cultural requirements can not be underestimated.</p>
	<p>D) Environment? The rural population in sparse areas such as Eden is lower now than at any time in the 19th century, there are many existing buildings that can be effectively reused to provide suitable housing for those in need. The effect of such development will have limited impact on the landscape value of the countryside and small villages, and may in many circumstances improve the landscape. From a climate change point of view, rural locations often provide the best opportunities to provide zero-carbon developments, and renewable energy</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>that can be exported back into the grid.</p> <p>E) Economy? The rural economy suffers from a lack of diversity and a lack of critical mass both in terms of market and labour. The current housing allocations will not allow the current population to remain stable, resulting in a greater reliance on seasonal and low paid employment in the tourist industry. A less exclusive allocation policy and an increase in the housing figures will allow the population to remain stable in the rural areas, while allowing modest growth in the larger settlements. This should help the economic base for the area. In addition, by providing some limited opportunities for wealth creators to move to rural areas, where significant investment in their personal property can occur, an increase in inward investment in the general economy is more likely.</p>
AGMA	<p>A) Delivery: See response to 1c for questions a - e</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? -</p> <p>E) Economy? -</p>
English Heritage	<p>A) Delivery: -</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? Environmental capacity issues associated with the historic environment will need to be addressed. The best use of the traditional housing stock needs to be made and vacancy rates reduced. The adaptive re-use of historic buildings can contribute to housing supply in both urban and rural areas. The role of Green Belts in preserving the setting and special character of historic towns needs to be maintained. SHLAA methodologies will need to take account of historic environment issues giving consideration to the site/areas historic environment and contextual features.</p> <p>E) Economy? -</p>
LDNPA	<p>A) Delivery: Delivery will be very difficult. There is a big question about the capacity of local planning authorities and the housing sector. Can they cope and process/ deliver so many houses</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>in a sustainable way?</p> <p>B) Infrastructure provision? At the RSS EIP, the Environment Agency expressed grave doubts about being able to deliver the infra-structure necessary to provide the maximum figures discussed then (which equate to the minimum now).</p> <p>C) Community and social issues? There is bound to be a negative reaction from existing communities to the imposition of large numbers of new houses, particularly when the case for them is so poor.</p> <p>D) Environment? National and regional government is paying no heed to the issue of environmental capacity in pushing for such extraordinary numbers of new houses. It is irresponsible on their part.</p> <p>E) Economy? The government appears to be under the illusion that delivering large numbers of extra houses will lead to a fall in house prices. This is unlikely.</p>
Cheshire East Council	<p>A) Delivery: Can probably be delivered</p> <p>B) Infrastructure provision? Can be accommodated</p> <p>C) Community and social issues? Can be dealt with successfully</p> <p>D) Environment? Minimal concerns</p> <p>E) Economy? No concerns</p>
Lancaster City Council	<p>A) Delivery: LDF Core Strategy sound and in place</p> <p>B) Infrastructure provision? Infrastructure levels acceptable</p> <p>C) Community and social issues? General community support for this level of growth</p> <p>D) Environment? Environment can accommodate this growth</p> <p>E) Economy? Correct fit with current assumptions about the ability of the economy to support growth</p>
CPRE North West	<p>A) Delivery: This option is more likely than any other to be capable of being delivered, particularly given the current housing market situation and projections for the future housing market and general economic climates. Planning for levels of provision higher than this is highly likely to result in local authorities having to allocate and release more greenfield land than is</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>necessary to meet needs or demand, and developers cherry-picking more profitable and convenient greenfield sites, leading to unnecessary environmental degradation and investment being withdrawn from urban areas in need of regeneration.</p> <p>B) Infrastructure provision? This option may not have substantial implications for new infrastructure provision. Ongoing work by the Environment Agency, NWDA and NWRA will confirm the position. It is very difficult to see how any of the other options could be delivered without substantial implications and without coming up against considerable constraints, most of which are not to be considered through this partial review, and which could not therefore be addressed or even properly assessed before any other option were implemented. It is therefore not practical or wise to take forward any other option. For example, any other option would require a review of transport infrastructure, as such significant increases in housebuilding would have obvious – but untested – impacts on road and public transport networks. The Environment Agency had significant concerns as to whether the level of provision in this option would put excessive and unacceptable strain on environmental infrastructure, eg water supply and waste water treatment. The impact of any higher level of provision would certainly do so, but to an extent that has not been tested, although limits would almost certainly be breached, given the likelihood that even this level of provision would breach some limits.</p> <p>C) Community and social issues? This option provides for the regeneration and renewal of the areas of the North West in most need of investment and development. The RSS EiP Panel were concerned that higher levels of provision could draw much-needed investment away from those areas, further imbalancing housing markets and resurrecting the problems of low demand and market failure that the region has gone some way to tackling. This option had been agreed through an extensive process of discussion and evidence gathering. Other options, by virtue of being imposed in a top-down fashion, are likely to have greater negative social and community impacts, as well as facing more resistance on the ground.</p> <p>D) Environment? Very few, if any, of the homes built before 2016 will be zero-carbon rated. Most will be built at Code for Sustainable Homes levels 3 and 4, which means that they will still add significantly to the region’s carbon emissions. The NW Energy & Greenhouse Gas Emissions Inventory (NWRA, 2007), which states that the region has no hope of achieving a ‘UK compliant’ emissions reduction by 2010, but may do so by 2020 but only if all sectors, sub-regions and partners work towards this. Planning to significantly increasing carbon emissions from the housing sector by significantly increasing housebuilding levels before 2016 puts the possibility of achieving this target in significant doubt; therefore in terms of climate change implications this option is preferable to the others. New research by the Empty Homes Agency demonstrates that it tends to</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>be more energy- and carbon-efficient, as well as cost-effective, to refurbish existing properties than to build new ones (see "New Tricks With Old Bricks", Empty Homes Agency, March 2008, available from http://www.emptyhomes.com/resources/papers_publications/ehapublications.html). The RSS EiP Panel were concerned that the environmental impacts of higher levels of housebuilding than proposed in this option were unknown: there is no evidence that there will not be significant detrimental impacts. Therefore, it can only be said with any certainty that there is not a sound evidence base upon which to gauge the environmental implications of any options other than this one. The implications for all aspects of environmental capital identified in NWRA's Environmental Capacity Scoping Study (2007) need to be taken into consideration, ie:-</p> <ul style="list-style-type: none"> <input type="checkbox"/> Landscape <input type="checkbox"/> Biodiversity <input type="checkbox"/> Air quality <input type="checkbox"/> Water quality <input type="checkbox"/> Water resources <input type="checkbox"/> Flood risk <input type="checkbox"/> Waste <input type="checkbox"/> Land use, minerals and soils <input type="checkbox"/> Recreation <input type="checkbox"/> Built and historic environment <input type="checkbox"/> Climate change <p>Ongoing work by the Environment Agency, NWRA and NWDA may provide such an evidence base, but in the absence of such evidence – as is the case at the current time – any approach other than adopting the precautionary principle as advocated in the UK Sustainable Development Strategy would be unsound.</p>
	<p>E) Economy? There is no evidence that the current level of housebuilding is constraining economic growth in the North West. Given the current housing market conditions, it is reasonable to assume that planning for a level of net provision somewhat, but not significantly, higher than current levels will continue to meet the needs of the economy. This was the conclusion of the RSS EiP Panel Report, and no evidence (as opposed to national Government aspiration) has emerged since then to contradict this view. Even if it were argued that growing the region's economy required a significant increase in housing provision, which is not the conclusion of NWRA's study into housing and the economy, as that study recognises, "it does not follow that future forecasts</p>

Organisation:	3. In taking forward this option, what are the implications for:
	of economic need should necessarily drive policy at the margins. Economic forecasts are only one element in the decision making process about the volume, type, location etc. of new housing which the region needs." (exec summary, para 46). The study also recognizes that, even through the lens of economic growth policy, far greater emphasis should be placed on renewing and improving existing stock, in terms of environmental sustainability, livability, and image/attractiveness.
J10 Planning	<p>A) Delivery: Meeting targets will not be met with low provision.</p> <p>B) Infrastructure provision? Nil because of proposed CIL.</p> <p>C) Community and social issues? Higher housing provision shall deliver enhanced community provision and enhance sustainable communities.</p> <p>D) Environment? Much Green Belt land fails to meet PPG2 criteria and its loss would not be detrimental to sustainable growth.</p> <p>E) Economy? Lower housing provision will reduce confidence in other commercial sectors and impact upon inward investment.</p>
Cumbria County Council / Cumbria Strategic Partnership	<p>A) Delivery: The implications for delivery in tasking this Option forward is that there may not be sufficient geographic flexibility in the current figures to allow for future aspirational growth to take place in the county, especially within West Cumbria.</p> <p>There are also current problems being experienced with the delivery of affordable housing at the moment, given the high levels of affordable needs, and insufficient Housing Corporation funding.</p> <p>Part of the problem relates to insufficient available housing sites as defined by PPS3, due to the fact that old style Local Plans in Cumbria are now out of date, many of the previous housing allocations have been taken up, and the slow progress of the LDF process to bring forward new allocations is delaying the delivery of new housing.</p> <p>Furthermore, there is recognition of the need to ensure that within South and East Cumbria there is a need to ensure that new housing meets identified local and affordable needs, given high levels of identified needs in the Cumbria Housing Needs Survey 2006.</p> <p>B) Infrastructure provision? The LDFs in Cumbria are currently addressing infrastructure provision during their preparation, taking account of levels of housing proposed in the current Proposed Changes to RSS.</p> <p>The Eden District Council Core Strategy and Housing DPD, for example, is the latest and most advanced in terms of progress in Cumbria at the moment, and is taking account of infrastructure needs based on these annualised</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>housing requirements.</p> <p>Likewise, the SLDC LDF Core Strategy and the LDNPA Core Strategy are also working through the infrastructure implications of the LDF based on the Proposed Changes to RSS annualised housing requirements.</p> <p>C) Community and social issues? Community and social issues are being addressed through respective LDF processes using the proposed Changes RSS figures.</p> <p>D) Environment? It is generally accepted that the annualised housing requirement in the Proposed Changes to RSS is sustainable, and can be accommodated within environmental capacities within Cumbria.</p> <p>It has been pointed out that in South Lakeland District, the level of new housing at 400 dwelling units per annum would be near to the environmental capacity and infrastructure of their area to absorb further development from a planning point of view.</p> <p>E) Economy? The Proposed Changes to RSS are considered to have taken account of economic factors at the time of the submission to the Examination-in-Public in late 2006/2007.</p> <p>However, it is recognised that the County-wide Strategic Housing Market Assessment, which is under preparation would measure economic as well as affordable and open market housing factors in a more comprehensive way, taking account of future aspirations for growth across the County.</p>
<p><i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.</p>	<p>A) Delivery: No different implications to the NWP. We noted in our representations to the NWP Proposed Changes consultation that Local Planning Authorities (LPAs) have had difficulty in ensuring that the average annual target for housing provision is met. We therefore request that the partial review's sets a 'mimimum' target instead of annual target so that LPAs can incorporate enough 'deliverable' (as set out in paragraph 54 of Planning Policy Statement 3: Housing) sites, along with incorporating appropriate allowances for sites from which their timetables may slip.</p> <p>B) Infrastructure provision? No different implications to the NWP.</p> <p>C) Community and social issues? Affordability issues will not be addressed (see below).</p> <p>D) Environment? No different implications to the NWP.</p> <p>E) Economy? The restriction of housing will reduce the level of economic input below levels which are envisaged in the Regional Economic Strategy. Directly, reduced house-building which likely mean a reduction in the construction industry. However, indirectly, this could jeopardise the North West's abilities to attract highly skilled workers which could assist in bridging the economic gap between the region and the rest of the UK. Without appropriate levels of housing, new and highly</p>

Organisation:	3. In taking forward this option, what are the implications for:
	skilled professionals will not come to the region.