



PARTIAL REVIEW OF REGIONAL
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A3.1
June – July 2008

CONSULTATION REPORT

North West Regional Assembly

PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A3.1

A consultation report from

CAG Consultants

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

July 2008

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

for direct enquiries about this report please contact:

Emma Cranidge
Ewood House, Ewood Lane, Todmorden, OL14 7DF
tel 01706 817347 or mob 07879 017617
ec@cagconsult.co.uk



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

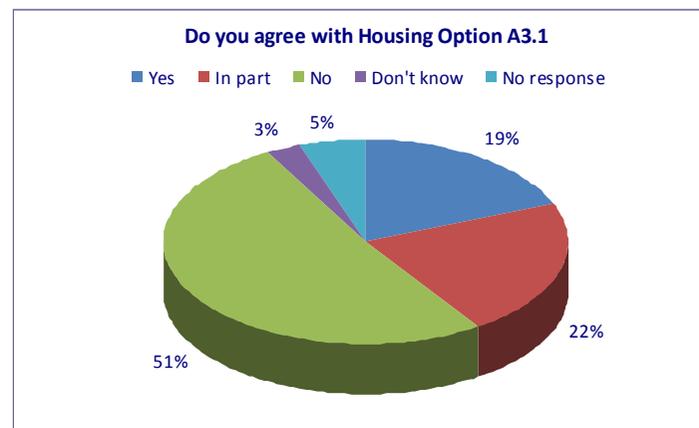
Workshop information, information on comments outside the questionnaire process, information that was received within the Draft Project Plan stage and the options paper are contained in a separate document.



1. Questionnaire Responses

1. Do you agree with Housing Option A3.1?

Do you agree with Housing Option A3.1?	
Yes	8
In part	9
No	20
Don't know	1
No response	2
Total Responses	40



The table below shows the verbatim comments received. We have removed 19 blank responses.

Organisation:	1. Do you agree with Housing Option A3.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Macclesfield Borough Council	No			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 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 in the first five

Organisation:	1. Do you agree with Housing Option A3.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>years will be very challenging. In considering the sites that would be required to deliver these housing numbers, the Strategic Housing Land Availability Assessment relies heavily on developing a number of sites that are currently in other uses, including employment sites, retail units, school 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 numbers 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. It is important to recognise the constraints to development within Macclesfield Borough. 82% of the land area is covered by Green Belt and National Park designations. The remaining area consists of open countryside beyond the Green Belt where development pressures are significantly reduced, and a number of towns that are all tightly bounded by Green Belt. Furthermore, extensive parts of the Borough (138 sq km) have been designated as Areas of Special County Value for Landscape, there are over 220 sites of nature conservation interest including 3 internationally important Ramsar sites and 13 nationally important SSSIs, and there are significant populations of endangered species such as the Great Crested Newt. There are also further constraints to development within the built environment, with 45 conservation areas and 1,855 listed buildings. Options A2.1 and A3.1 propose two differing levels of increase in housing provision, spread throughout the region based on the existing spatial distribution. Adoption of either of these options would therefore result in a significant increase in the housing provision figures in Macclesfield. Whilst we would not wish to constrain those areas wishing to pursue growth agendas, it is clear that Macclesfield Borough cannot accommodate any increase over the 400 per year without serious consideration of development of Green Belt land. Given that the housing figures could now be seen as minimum figures and are to be regarded as a 'floor' rather than a 'ceiling', continuation of the existing provision figures would still allow additional growth in areas where appropriate. The options paper claims that either continuing the existing level of provision, or increasing the provision to the lower end of the range proposed by the National Housing and Planning Advice Unit may not give sufficient flexibility to accommodate all growth point bids. As the figures are to be regarded as a minimum,</p>		

Organisation:	1. Do you agree with Housing Option A3.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		there appears to be no ceiling on the level of provision and therefore all growth points could be accommodated by continuing the existing level of provision. Alternatively, an increased overall housing figure for the region could be accommodated by adjusting the spatial distribution based on analysis of the circumstances and ability to deliver increased numbers at district level.		
Northwest Regional Development Agency	Yes	Given the range of housing distribution put forward in the options paper, we would be inclined to support Option A3. We feel that 32 000 dwellings per annum is most likely to be reflective of the advice given by NHPAU to Ministers deemed necessary to stabilise housing market affordability in the region in line with Government's stated intentions. This level of provision is also likely to provide sufficient flexibility in order to accommodate any successful growth points alongside an adequate distribution of rural housing provision. In addition, planning for this level of housing provision would ensure appropriate testing through the Partial Review process. Option 3 proposes housing provision in the region of 32 000 dwellings per annum which is stated to be at the higher end of the range proposed by NHPAU. Whilst this figure reflects the indicative range published within the NHPAU's response to the Housing Green Paper (NHPAU (2007) Developing a target range for the supply of new homes in England, Table 18, p 30) , the options paper should acknowledge that the final advice to Ministers is yet to be published and therefore figures quoted are purely illustrative at this stage.		
Indigo Planning	Yes	CEG supports the increase in housing figures as this will provide a stronger impetus for accommodating the Growth Point bids, delivery of new homes and affordable homes and enable local authorities to address housing needs. It will provide a significant step change in housing delivery, and through disaggregation to the local authority areas based on Strategic Housing Land Availability Assessments (SHLAA), will enable better management of housing delivery.		
Indigo Planning Limited	Yes	These options seek to provide for housing at the higher end of the range set out in the National Housing and Planning Advice Unit's (NHPAU) projections, with the provision of 32,000 dwellings per annum (38% increase). As set out above, the options seek to either retain the current spatial distribution or change it to place more emphasis on provision in rural areas. CEG supports the increase in housing figures as this will provide a stronger impetus for accommodating the Growth Point bids, delivery		

Organisation:	1. Do you agree with Housing Option A3.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		of new homes and affordable homes and enable local authorities to address housing needs. It will provide a significant step change in housing delivery, and through disaggregation Page 3 of 3 to the local authority areas based on Strategic Housing Land Availability Assessments (SHLAA), will enable better management of housing delivery. Comments regarding the spatial distribution are as noted above.		
Environment Agency	No	The Environment Agency's comments to option A2.1 apply. However, the additional 100,000 homes proposed under this option will increase any pressures on the environment and any infrastructure capacity issues compared to that option. Therefore, before any option proposing this level of growth is progressed, we would expect its sustainability and deliverability to be very carefully considered and tested as part of the partial review process. The Environment Agency looks forward to contributing to this process.		
Bartonwillmore on behalf of Paycause Ltd	Yes	Paycause supports the principle of an overall increase in Housing provision through the evidence suggested by the NHPAU. Further evidence and analysis needs to be undertaken in order to be used to properly inform emerging regional policy. The implications of increases in overall numbers are considered below.		
GONW		A3.1 As previous comments on A2.1, Government response to NHPAU, GONW will provide further feedback on the upper range figure. However, currently this figure is above the annual average figure and slightly above the peak figure for 2016 set out in the NHPAU report.		
Preston City Council	No	This would accommodate growth point needs but would require housebuilding levels significantly above those achieved in the past during a short term (at least) decline in housebuilding. There are significant implications in terms of the infrastructure needs of such levels of development but no implications for larger scale rural housing development.		
Halton Borough Council	No	A3.1 represents an increase in housing numbers at the high end of need forecast by the National Housing and Planning Advice Unit. This option would represent a very significant increase on current figures, and would almost certainly require many districts to release land from the Green Belt for housing. It is therefore not supported.		
National Trust	No	This level is in fact well beyond the high end of the latest forecasts that have recently		

Organisation:	1. Do you agree with Housing Option A3.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
				come forward, and these have not adequately factored in changes in trends over the last 6-9 months relating to the economy. It is clear that this level of development is unrealistic.
Blackpool Council	No			There are major question marks as to whether such an increase is deliverable or achievable even if presented as a target figure rather than an annual average to be achieved over the 25 year period. Whatever the aspirations, the need for soundness and realism suggests a suitably adjusted A2.1 option is the most that could be achieved.
Local resident	No			The lower of the options is supported.
Lancashire County Council	In part			Under the spatial distribution established in the current review of RSS, the Option would be best able to accommodate the levels of growth envisaged in the submitted Central Lancashire, Blackpool Growth Point Expression of Interest.
Sustainable Neighbourhoods Pool Manchester	No			With such a massive emphasis on house building, there will be tremendous strain on Local Authorities and the environment and under the clamor of deciding where to place all of this new provision there is a likelihood of poor quality unsustainable housing. Utilising existing property should be the priority.
Cheshire West and Chester (comments represent informal officer views)	No			We are very uneasy about a housing figure at this level, and more-so because it would be a minimum level. It is unlikely to be achievable. Certainly it won't be achievable in the short term because of economic conditions. There is concern that provision would simply be market-led; that easy to develop sites would be picked off leaving more difficult regeneration sites undeveloped. There would be significant implications for infrastructure development.
Haslington Parish Council	In part			Although South Cheshire would take a smaller percentage of the distribution than in other scenarios - the proposed figure is still a large value to accommodate within a predominantly rural area.
Merseyside Policy Unit	No			This option would represent a very significant increase on current figures, and would almost certainly require many districts to release land from the Green Belt for housing. It is not therefore an option we can support.
Copeland Borough	In part			We agree with the level of provision but would wish to see the Review include a new

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Council		balance of distribution across Cumbria which would ensure that the regeneration priorities of West Cumbria are protected. The NWRA is a partner in the West Cumbria Strategic Forum along with all government depts and local authorities. Their joint commitment is to implementing the West Cumbria Masterplan (Britain's Energy Coast, 2007) and this estimates a requirement for up to 20,825 new dwellings over the period 2007 - 2032. However, if current RSS levels of distribution are maintained there is a danger that general housebuilding rates in the east and north of the County could jeopardise the markets in Copeland and Allerdale and thereby weaken the efforts towards the regeneration of West Cumbria.		
RPS Planning	No	The level of provision for South Cheshire is considered to be too low and the requirement for both Manchester and Liverpool is significantly higher than historic build rates. Greater consideration needs to be given to the realism of the strategy in terms of housing delivery particularly in the short to medium term. Housing trajectories for each sub region should undertaken to inform decisions about future housing distribution.		
satnam planning services ltd	Yes	This option is a positive response to the requirements likley to be made of the region over the next decades. It will go towards achieving the reversal of past trends, which have led to housing supply imbalances, high levels of housing exclusion and low levels of provision.		
Carlisle City Council	In part	Given that RSS has only recently established the spatial framework the upper level of NHPAU figures does provide Carlisle with a reasonable target to assist its economic delivery for growth. It is anticipated that spatial distribution may be more difficult to reasses and therefore this level of growth would be required.		
Ribble Valley BC	No	not appropriate to the nature of the ribble valley would lead to excessive housing provision		
Lambert Smith Hampton	In part	Whilst we generally support the increase in housing provision figures, the figures should be tested. The advice to Government from the NHPAU is that the supply range should be tested at the regional level. The regional figures are not baed on testing, but rather are taking the figures set out by the NHPAU as the requirement, with no further justification. In order to comment fully on a revision of district housing figures each LPA in the north west will need to supply up-to-date accurate information on their		

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		<p>housing land availability. However, not all LPAs are at the same stages of the LDF and therefore may not have up-to-date information. 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 requirement. The City regions may not have the capacity to retain such a sustained period of growth in housing supply especially given the current market conditions. Many regeneration projects in the City region have taken place and as such the spatial distribution should be revised and support locations which have missed out due to restrictions on housing supply.</p>		
West Lancashire District Council	No	<p>If housing were to be distributed across the Liverpool City Region as at present this would give a figure of 416 units a year to West Lancashire. This is too high, but it is difficult to comment without knowing the results of the SHLAAs in the Liverpool City Region and what sort of housing numbers would be required in West Lancashire itself.</p>		
Allerdale Borough Council	In part	<p>We consider this option to be at the upper end of the range of deliverability. On the basis of current distribution of numbers in Cumbria this option would require an average completion rate of 370 in Allerdale which is a significant increase over recent trend. Whilst, in theory, this figure would facilitate the delivery of affordable housing and the more aspirational elements of local economic strategies, we have serious doubts about the deliverability of such numbers over a sustained period of time. These doubts are reinforced by the current deteriorating state of the national and local housing markets. It is also considered that there would be localised problems of environmental capacity and infrastructure shortfalls in some areas. Whilst Allerdale could "live with" this option we prefer the lower end of the NHPAU range with the existing spatial distribution regionally.</p>		
Emerson Group	In part	<p>The aim of housing provision is to meet need and demand. The use of the high end figures produced by NHPAU which gives over a 25% increase on the proposed SoS changes to the Draft RSS is the most logical way forward. Initially it will be difficult to meet the figures as the current economic situation precludes gearing up to this level of annual completions and even before the current economic difficulties caused by the banking and mortgage lending sectors the artificially low figures in RPG 13 and</p>		

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		<p>moratoriums in the North West have reduced the immediate capacity of the construction trades to respond quickly to increased numbers. However over time this will be resolved. Whilst some adjustment to the spatial distribution may be justified this should not be at the scale proposed. Investment in the Liverpool and Manchester City Regions has been immense over the past 10 years and to hazard the success on the basis of seeking more rural housing development would be a mistake. This especially given that the shortage of housing supply in smaller towns and rural areas has been policy led throughout the North West. Some adjustment would be appropriate but not at the levels being proposed in Option A3.2</p>		
LDNPA	No	<p>For similar reasons expressed before, the RSS establishes a figure for the LDNP of 60 units pa. Any upward variation on this will be extremely challenging to deliver. The RSS figure is based on robust evidence. Build completions over the last 5 years (2002-2007) expressed an average of 136, but this includes unfettered permissions. The new policy in RSS for the LDNP is for local needs and local affordable needs only; an approach advocated through our Core Strategy preferred options as appropriate to the LDNP. The conclusion of our SHLAA adds a notes of caution to a hike in the figures. We do not wish to compromise our ability to deliver housing appropriate to the LDNP that is based on identified need rather than aspiration growth.</p>		
GVA Grimley (on behalf of Goodman)	Yes	<p>This option provides the North West with the best opportunities for growth during the plan period. The highest recommended level of housing should be allowed for with a continued focus on new development within the main urban areas based around Liverpool and Manchester. Highest recommended levels of housing should be provided for within the plan to accommodate for more inward migration to the region, more inward investment and therefore continued economic growth.</p>		
Wirral MBC	No	<p>Wirral would not be able to accommodate an increase in provision of the scale indicated (+38%) without a radical change in the wider spatial strategy even if the Liverpool/Wirral Growth Point was accepted. This would also have major implications for HMRI at the heart of the urban area.</p>		
Pendle Borough Council	No	<p>This option would increase the annual provision figure for Pendle, however it is unlikely to be a significant enough increase to meet the requirements in the Burnley and Pendle SHMA. The SHMA for Burnley and Pendle indicates that there is a gross</p>		

Organisation:	1. Do you agree with Housing Option A3.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>overall demand for new dwellings in the Pendle area. The SHMA identifies an annual provision figure of 275 dwellings which is higher than the figure proposed in this option. The annual figure for Pendle under this option (calculated as 245 on the basis of the current percentage split between authorities in the Central Lancashire City Region) is lower than the current average annual build rate within the borough which stands at 270 (over the last 5 years). It should be noted that this average build rate will have 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>		
Congleton Borough Council	Don't know	<p>It is suggested that further consideration would need to be given to the effect of the proposed options on both Congleton Borough and the wider Cheshire East Authority. To ensure that an appropriate balance is provided which would allow the Borough to:</p> <ul style="list-style-type: none"> · address the needs of the rural areas; · meet the demands for affordable housing; · ensure that future housing development, as far as possible, meets the principles of sustainable development; · develop within its social and environmental capacity; and · ensure that the development of the Borough does not prejudice development within the housing regeneration areas in the wider area. <p>It is also suggested that other policies specifically targeted at delivering affordable housing schemes in rural areas may be more appropriate and effective than simply increasing the provision for both affordable and market housing in rural areas, in addressing the affordability issues within the Borough.</p>		
NW Transport Roundtable	No	<p>These figures are not realistically achievable but, even if they were, they would represent potentially devastating environmental impacts.</p>		
Cheshire East Council	No	<p>This option would have the flexibility to accommodate all the successful growth points announced by the Government in the North West. As this option represents a 38% increase on the level of provision in the draft RSS, it would be subject to further testing through the appraisal process and the findings of technical evidence which have yet to be completed. The level of house building proposed is not dissimilar to what has been achieved in Crewe and Nantwich over the past 3 years; but again it</p>		

Organisation:	1. Do you agree with Housing Option A3.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		would result in excessive green field development.		
Cumbria County Council / Cumbria Strategic Partnership	Yes	<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 A3.1 that the figure of 3,040 for Cumbria and North Lancashire should necessarily mean that Cumbria would retain the current proportionate split of the Proposed Changes to RSS (currently 1,796 for Cumbria and 400 for Lancaster = 2,196).</p> <p>Assuming that the proportionate split of the Proposed Changes to RSS remains unchanged, Option A3.1 would, in effect, increase the annualised housing requirement from 1,796 dwelling units in Cumbria to 2,487 units per year, which equates to 38.4% (i.e. % x 3,040-2,196 in Option A3.1 table applied to Proposed Changes RSS Cumbria figures).</p> <p>If this were to be distributed amongst the districts based on the current proposed Changes to RSS proportions, this would result in the following annualised housing requirements: Allerdale - 370; Barrow - 208; Copeland - 318; Eden - 331; SLDC - 554; LDNPA - 83; and Carlisle - 623 units.</p> <p>Data held by Cumbria County Council shows that the 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>It is considered that this level of new housing growth at 38.4% would be better than the levels in the Proposed Changes to RSS. Whilst it is considered that this level of growth might be possible across Cumbria, it is of some concern that there are likely to be particular adverse effects upon environmental capacity and infrastructure in parts of the County, in particular within the rural parts of Allerdale, all of South Lakeland and the rural parts of Carlisle. For example, in South Lakeland, the level of new</p>		

Organisation:	1. Do you agree with Housing Option A3.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>housing identified in the current Proposed Changes to RSS (400 new dwelling units per annum) is near to the environmental capacity of their area to absorb new development.</p> <p>There are concerns that there should be sufficient levels of new housing proposed in the Partial Review of RSS for West Cumbria to satisfy the Energy Coast master plan, which identifies the need to provide for 5,500 new dwellings over and above the Proposed Changes to RSS. It is considered that there should be sufficient flexibility in the RSS for these Districts to respond to the growth agenda for West Cumbria.</p> <p>At the same time, it is also important that any new growth in South & East Cumbria should not be at the expense of regeneration efforts made in West Cumbria. Furthermore, housing growth in South and East Cumbria should meet the identified local and affordable housing needs of the area, and respect the environmental capacities of these areas.</p> <p>The increases in overall housing provision set out in this Option need to consider the implications for planning authorities in their management of future supply and their ability to give priority to meeting local needs. For example, in South and East Cumbria, new housing provision will need to prioritise meeting the evidence of local needs, including significant levels of affordable housing. High levels of unfettered housing development would clearly have implications for environmental resources and put pressure on the limited infrastructure capacity. Certainly existing policy measures would need to be retained to reduce the adverse impacts of second home ownership and retirement immigration on housing availability for local people. In West Cumbria, high levels of provision need to be applied with care to ensure the existing programmes for housing renewal and major urban regeneration are not prejudiced by more commercially attractive greenfield housing development.</p> <p>Overall, it is considered that the level of housing growth in Option A3.1 is more likely to be compatible within environmental limits compared to other options, and would be less likely to lead to unsustainable levels of growth across the County, compared to the other higher growth Options. However,</p>		

Organisation:	1. Do you agree with Housing Option A3.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>it might not be appropriate to maintain the current proportionate District split of the current Proposed Changes to RSS within Cumbria, and that a revised level of new housing will best be identified on the evidence of the Cumbria-wide Strategic Housing Market Assessment. Any proportionate split will need to take account of the aspirations for growth in West Cumbria through the Energy Coast Masterplan, and the environmental constraints, especially within South and East Cumbria.</p> <p>Cumbria County Council and the District Authorities are currently preparing a County-wide Strategic Housing Market Assessment, which should better indicate appropriate levels of housing growth, taking account future economic aspirations, the evidence of the Housing Needs Survey 2006, as well as open market housing needs. At this stage, it is not clear as to what level of housing growth might be derived by this study, and how this might compare to this option in the Partial Review. 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 these aspects.</p>		
<p><i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.</p>	<p>In part</p>	<p>We agree that the provision set out in this section is the most appropriate to address long-term affordability issues as well as promote economic growth in the region. The NHPAU has suggested that 29,600 new dwellings per annum is the minimum needed to address the backlog to 2004; however, this figure should be viewed as a minimum and we consider 32,000 dwellings per annum to be appropriate to address even longer-term affordability issues. Further technical work should assess the potential of this figure.</p> <p>This would give maximum flexibility in including provision announced through the Growth Point Initiative and any Eco-towns Initiative.</p> <p>See our response to Question A1.1 above regarding distribution.</p>		

Organisation:	1. Do you agree with Housing Option A3.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Crewe and Nantwich Borough Council	No			<p>This option would have the flexibility to accommodate all the successful growth points announced by the Government in the North West</p> <p>As this option represents a 38% increase on the level of provision in the draft RSS, it would be subject to further testing through the appraisal process and the findings of technical evidence which have yet to be completed.</p> <p>The level of house building proposed is not dissimilar to what has been achieved in Crewe and Nantwich over the past 3 years; but again it would result in excessive green field development.</p>

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

The table below shows the verbatim comments received.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
Macclesfield Borough Council	Any increase in housing in Macclesfield Borough will have important consequences for other policy areas such as economic growth, transport and the environment. As this is a partial review, increased housing numbers are being considered largely in isolation and there is no scope for reviewing important linked policy areas. Although not the case in every district, Macclesfield's inability to provide increased housing numbers without risks of incursions into the Green Belt is unlikely to be an isolated situation, and other areas may have similar issues. Any blanket increase in housing numbers throughout the region would therefore need to take place with an associated strategic review of Green Belt. Without such a review, it would not be appropriate to take forward options which would require development of Green Belt land to deliver the level of provision proposed.
Environment Agency	The Environment Agency feels that the extra 100,000 homes proposed in this option amplifies the delivery issues and challenges raised in our response to question 2 for option A2.1.
Bartonwillmore on behalf of Paycause Ltd	There will be a need to consider an early review of Green Belt land policy in the Liverpool City region. However, where a potential opportunity exists for Growth Point Status to be put forward by developers in order to meet housing demands within the Liverpool city region and in particular to meet the growing housing needs of Chester this may demonstrate very special circumstances to warrant early release. We note that the Yorkshire and Humber Plan is undertaking a review following its publication in May 2008 where there is a " Call for Evidence" for developers to put forward potential Growth Points /Areas, areas for New Settlements and major expansion areas. Paycause has a freehold ownership of strategic landholdings to the south west of Chester which it believes will help deliver increasing housing growth in the Chester district. Our clients would welcome the opportunity to discuss this and put forward its formally at the regional level which could be used to inform the NW RSS spatial strategy.
National Trust	Would have considerable issues for the whole of RSS and require a full review rather than the partial review that has been embarked upon.
Lancashire County Council	Further evidence of how the figures are derived is required. Whilst the impact of the 'credit crunch' is an event that will impact the housing market in the short term, it is open to question whether the market would be able to deliver 32,000 dwellings pr annum to 2032 in the North West as a whole.
Haslington Parish Council	Need to ensure protection of rural areas

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
satnam planning services ltd	Flexibility is required to respond sensibly to the announcements over growth points and revised requirement figures and to ensure that logical and well balanced growth and restraint strategies can be developed for each of the sub regions.
Lambert Smith Hampton	Revise and amend Policy UR7 and Policy L4 of the emerging RSS to take account of the increased housing numbers. Include a policy which supports the provision of sufficient rural housing (affordable and market) to address the needs of rural communities. Amend and revise Policy RDF2 of the emerging RSS to support the provision of rural housing in appropriate locations.
West Lancashire District Council	Green Belt releases would be likely to be needed to deliver this option, although in the absence of a SHLAA this cannot be certain.
Allerdale Borough Council	The regional spatial development framework may have to change as well as the spatial distribution within Cumbria and within Districts. Some Cumbrian authorities may not feel able to support such a scale of development and it may be appropriate to redistribute their "surplus". We would suggest an emphasis on RPAs in such circumstances even though such a move would raise the targets in West Cumbria above the 370 figure which itself is on the edge of deliverability.
Emerson Group	Significant re-appraisal of many of the chapters and policies in the Draft RSS will be needed to take on board the ramifications of increasing new housing supply as well as the different household sizes and distribution.
GVA Grimley (on behalf of Goodman)	In order to deliver this increase in housing numbers, it will need to be recognised that some new residential development will need to be located in out of centre locations and on greenfield sites, though still within the principle urban areas.
Wirral MBC	This Option is likely to require a major change to the overall spatial strategy
NW Transport Roundtable	There should be no attempt to alter RSS to deliver such high housing numbers. The RSS Panel's concerns must be taken into consideration.
Cumbria County Council / Cumbria Strategic Partnership	<p>There may be implications for the spatial distribution and development emphasis given to the Key Service Centres, Local Service Centres and rural areas with Option 2.2 (i.e. Policies RDF1, RDF2), and the Spatial Principles in DP1 as well as WW3 and W5. The Overall Spatial Priorities for Cumbria (Policy CNL1) the Sub-Area Development Priorities (Policy CNL2) and the Spatial Policy for the Lake District may require reconsideration.</p> <p>It is considered likely that if the level of development proposed in this scenario were to be implemented, there could be problems for those LDFs already at an advanced stage of preparation, as well as those Local Plans recently adopted. Consideration might need to be given to some landscape designations, taking account of where new development is likely to take place,</p>

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	<p>and the spatial distribution of new development.</p> <p>It might not be appropriate to maintain the proportionate District split of the current Proposed Changes to RSS within Cumbria, and that a revised level of new housing will best be identified on the evidence of the Cumbria-wide Strategic Housing Market Assessment. Any proportionate split will need to take account of the aspirations for growth in west Cumbria through the Energy Coast master plan, and the environmental constraints within South and East Cumbria.</p>
<p><i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.</p>	<p>As set out in answers to Question A2.1 above.</p>

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

The table below shows the verbatim comments received. We have removed 16 blank responses.

Organisation:	3. In taking forward this option, what are the implications for:
Macclesfield BC	A) Delivery: -
	B) Infrastructure provision? Infrastructure issues would also need to be considered in order to increase housing numbers. Involvement of the utility suppliers is required to determine where capacity can be increased and where there are constraints to increasing infrastructure capacity. Road infrastructure schemes would need to be reviewed; in Macclesfield, early delivery of bypass schemes including Alderley Edge, Poynton and the Manchester Airport link road would be crucial to unlocking Green Belt sites for development.
	C) Community and social issues? -
	D) Environment? The draft SHLAA indicates that increasing the level of housing provision in Macclesfield is likely to require incursions into the Green Belt.
	E) Economy? Further increases in housing, combined with the further losses of local employment facilities may lead to more unsustainable patterns of commuting and further pressures on the local and regional transport network.
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 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

Organisation:	3. In taking forward this option, what are the implications for:
	<p>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.</p> <p>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.</p> <p>E) Economy? -</p>
Indigo Planning Limited	<p>A) Delivery: Whilst CEG accepts the need to better provide housing in the 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> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? -</p> <p>E) Economy? -</p>
Environment Agency	<p>A) Delivery: The Environment Agency feels that the extra 100,000 homes proposed in this option adds to the issues and challenges raised in our response to question 3A for option A2.1.</p> <p>B) Infrastructure provision? The Environment Agency feels that the extra 100,000 homes</p>

Organisation:	3. In taking forward this option, what are the implications for:
	proposed in this option adds to the issues and challenges raised in our response to question 3B for option A2.1.
	C) Community and social issues? NC
	D) Environment? The Environment Agency feels that the extra 100,000 homes proposed in this option adds to the issues and challenges raised in our response to question 3D for option A2.1.
	E) Economy? NC
Bartonwillmore (<i>on behalf of Paycause Ltd</i>)	A) Delivery: Paycause considers there is a need for Green Belt land review, specifically in the Liverpool city region and in particular Chester, given the dynamics of the district where there is a limited amount of "brownfield land" within existing settlements. It is therefore inevitable that there will be a need to release land beyond the existing settlement limits but which are in sustainable locations in order to deliver the objectives of PPS1, PPS3 and PPG13. Delivering land needs to have the willingness of landowners, and the case of our clients landholdings, their strategic site is suitable, available and achievable
	B) Infrastructure provision? There is a need for a co-ordinated response received from all statutory undertakers in particular the Environment Agency and Drainage authorities in order that the constraint implications can be understood and future growth planned for in a proper phased and coordinated manner. There will also need to be comments from the relevant highways authorities and where appropriate the highways agency in order that a clear understanding of the potential traffic issues are fully taken into consideration.
	C) Community and social issues? there may be the opportunity to improve existing social services and infrastructure or potentially provide further services through a comprehensive approach to making communities more sustainable through growth. There would also be the opportunity to offer a significant amount of affordable housing through the delivery of large strategic housing sites in growth areas, such as Chester, that may not be achieved through a distribution across the wider area (in spatial terms) especially rural areas.
	D) Environment? there will be a need to consider the environmental implications of potential large scale release of land, and as such a balance would need to be struck to ensure suitable mitigation measures are implemented to minimise any potential adverse impacts that may arise from future development proposals
	E) Economy? Sustainable development underpins the planning system principles and as such growth should be directed towards areas/settlements that are able to provide or able to expand

Organisation:	3. In taking forward this option, what are the implications for:
	employment areas, reducing the need to travel. This includes for example Chester, which as a key settlement in the Region is able to provide such a role. Therefore its potential expansion to the south-west of the settlement would underpin the spatial policy for the NW region in the emerging plan period
National Trust	A) Delivery: Not practical = undeliverable.
	B) Infrastructure provision? Not achievable for this level of development in the short to medium term.
	C) Community and social issues? No additional comments.
	D) Environment? Environmental capacity issues will be severe 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. Formal assessment of the ability of the environment to successfully accommodate this level of development would be needed, but the initial expectation is that there would be significant adverse impacts.
	E) Economy? It would 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. However, it is unclear that such an approach is either realistic or achievable.
Blackpool Council	A) Delivery: The implication of the current downturn, even if relatively short-lived, is that this option is unrealistic and not deliverable. Effectively this option will subsequently require future growth of more than 34,000 p.a.
	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.
	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 – but an increase in the housing figure will make no difference, unless the market can sustain housing growth.
	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

Organisation:	3. In taking forward this option, what are the implications for:
	<p>of proposed growth is consistent with the sustainable capacity of areas to accommodate it. 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. The increase of 38% in the figures over option A1.1 is considered cannot be delivered in the context of the current downturn and, environmentally, would have a major adverse impact on more rural areas.</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 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.</p>
Haslington Parish Council	<p>A) Delivery: -</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? 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>D) Environment? -</p> <p>E) Economy? -</p>
Merseyside Policy Unit	<p>A) Delivery: -</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? This option would potentially require the significant release of green belt land for housing.</p>

Organisation:	3. In taking forward this option, what are the implications for:
	E) Economy? -
Satnam Planning Services Ltd	<p>A) Delivery: A good level of housing delivery, aimed at meeting both locational and affordability issues, can be devised which will lead to a better level of access for those already living in the region and those seeking work in all parts of the region.</p> <p>B) Infrastructure provision? Significant infrastructure improvements and reinforcements can be planned and provided under this option, leading to significant improvements in the quality of life in the region.</p> <p>C) Community and social issues? Social and community tensions created by lack of investment and housing choice and location can be addressed by this option; provision is more able to respond to consumer choice and demand in location of and type of housing.</p> <p>D) Environment? Adequate and necessary safeguards will need to be developed to be placed upon growth in the region and this can be achieved whilst still providing the necessary levels of growth.</p> <p>E) Economy? This level of provision will support the regional economy and inward investment required to make the North West improve it's economic performance.</p>
Lambert Smith Hampton	<p>A) Delivery: Unable to fully comment on the deliverability of the increased housing provision figures until they have been fully tested and the Housing Land Availability Assessments have been carried out throughout the region.</p> <p>B) Infrastructure provision? An increased requirement for additional housing would lead to an opportunity for an improvement in the existing infrastructure as new developments are brought forward. This could be achieved through local Government levey's or S106 Agreements.</p> <p>C) Community and social issues? An increased housing provision will improve the opportunity to provide a wider choice of housing, high quality housing, mixed communities particularly in terms of tenure and price and a mix of different households, such as families, single persons and older people.</p> <p>D) Environment? Although there would be more opportunity to support the regeneration of brownfield sites across the region and improve the quality of the housing stock, development would tend to be either skewed towards every bit of urban land within the Manchester and Liverpool City regions with an inappropriate density related to the infrastructure and services available, or expand out the boundaries of the city regions which would encourage development</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>would be moved away from the Central Core areas contrary to the spatial distribution objectives.</p> <p>E) Economy? Investment would be encouraged in to the city region areas. However, investment may not be encouraged to other areas of the region.</p>
West Lancashire District Council	<p>A) Delivery: The market would 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.</p> <p>B) Infrastructure provision? Unknown</p> <p>C) Community and social issues? -</p> <p>D) Environment? -</p> <p>E) Economy? -</p>
Allerdale Borough Council	<p>A) Delivery: As above we regard this option as being at the upper range of deliverability and potentially beyond it over a sustained period. At 370 a year we do just have a 5 year supply unless the target were "backdated".</p> <p>B) Infrastructure provision? There could be local infrastructure problems insome service centres especially in rural areas.</p> <p>C) Community and social issues? Localised problems of environmental capacity may require a local spatial distribution which is unsustainable in some ways.</p> <p>D) Environment? This option would in theory facilitate the delivery of the aspirations of local economic strategies, but as stated above economic growth cannot be housing -led, and there is no evidence to suggest that the employment opportunities needed to go hand in hand with such numbers can be delivered.</p> <p>E) Economy? Whilst this scale of growth would allow our LDF to encompass even the most optimistic scenario in local economic strategies we know that economic growth cannot be housing-led but must go hand in hand with real growth in employment opportunities.</p>
Emerson Group	<p>A) Delivery: It will take time for the delivery of the projected completions to be met. A rising trend in terms of completions will be necessary. The pattern of achievement of delivery will be dependent on resources in the construction industry and need and demand in the various Strategic Housing Markets.</p> <p>B) Infrastructure provision? This will require re-appraisal and upgrading as necessary</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>C) Community and social issues? Re-evaluation of the provision and scale of these facilities will be needed.</p> <p>D) Environment? There may be a requirement to rationalise on the environmental importance of all sites that are given some sort of protection from development. This may involve an earlier review of the boundaries of Green Belts than was previously anticipated given taht the supply of brownfield sites will begin to reduce and if the trend against the popularity of flats continues average densities on brownfield sites will fall.</p> <p>E) Economy? Will need to appaise requirements in line with expected new household formation patterns.</p>
GVA Grimley (<i>on behalf of Goodman</i>)	<p>A) Delivery: This option will ensure that the North West is able to deliver sufficient residential development to accommodate the future growth of the region.</p> <p>B) Infrastructure provision? By recognising the increased housing numbers from the outset of this partial review, sufficient infrastructure improvements can be considered and then implemented in line with housing growth.</p> <p>C) Community and social issues? Recognising this level of growth at this early stage will also allow for community and social issues to be adequately addressed.</p> <p>D) Environment? Impacts on the environment will be minimised if this option is pursued as increased housing numbers and the location of new development can be properly managed.</p> <p>E) Economy? This option will allow maximum benefits to the economy by continuing to attract inward investment. This link between housing numbers and economic growth should not be undervalued.</p>
Wirral MBC	<p>A) Delivery: This Option would have major implications over and above the acceptance of the Liverpool/Wirral Growth Point.</p> <p>B) Infrastructure provision? This Option would have major implications over and above the acceptance of the Liverpool/Wirral Growth Point. The precise impacts cannot be quantified at this time.</p> <p>C) Community and social issues? This Option is likely to have major implications for HMRI and social regeneration at the heart of the urban area.</p> <p>D) Environment? This Option is likely to have major environmental impacts outside the current</p>

Organisation:	3. In taking forward this option, what are the implications for:
	spatial strategy.
	E) Economy? -
NW Transport Roundtable	<p>A) Delivery: There is no real prospect for delivery - but it should not be attempted. Realism must prevail.</p> <p>B) Infrastructure provision? The Environment Agency admitted at the last RSS EIP that it would be a struggle to provide the infrastructure for the lower figures being disussed through this Partial Reviw (which equate to the maximums discussed then).</p> <p>C) Community and social issues? Existing communities would react very badly to such large scale changes being imposed.</p> <p>D) Environment? The environmental capacity does not exist to provide such a large number of houses in the time frame.</p> <p>E) Economy? There is no guarantee, in a market economy, that significantly increasing the numbers of houses being built will reduce the cost of them for buyers.</p>
Cumbria County Council / Cumbria Strategic Partnership	<p>A) Delivery: Given previous historic rates of planning permissions and completions, it is envisaged that these figures would not be likely to result in an unmanageable increase in growth. However, there might be problems arising from the ability of Cumbria to deliver this level of additional affordable housing due to the current restrictions on Housing Corporation funding arrangements, and the ability of RSL's to deliver significant increases in the levels of affordable housing.</p> <p>The upwardly revised annualised housing requirement numbers should in theory increase flexibility to deliver all-types of new housing by enabling the Districts to allocate more available land, and enable cross subsidy for affordable housing on open market housing sites through the use of S106 agreements.</p> <p>It is suggested that as an alternative means to delivering affordable housing, there could be a 'viability' quota of around 20-30% affordable provision, should the overall annual requirement increase to 2,487 units per annum. This would give around 497 affordable units (at 20%), which equates to 38% of the annual affordable housing need in Cumbria (i.e. 1,299).</p> <p>The concerns relating to the ability of Housing Corporation funding to deliver expected levels of affordable housing remain. However, the increase will offer greater flexibility for delivery through the allocation of sites and the potential for cross subsidy with open market housing through S106</p>

Organisation:	3. In taking forward this option, what are the implications for:
	agreements.
	<p>B) Infrastructure provision? There might be implications arising from this rate of housing growth upon local infrastructure provision, especially in Allerdale (370 units pa) Carlisle (623 units pa) and SLDC (554 units pa), where the increase could lead to additional pressures upon education, highways and transportation, and provision of social facilities.</p> <p>It is not clear at this stage as to what the impacts might be and where they maybe most apparent. This aspect requires further thought outwith the timescales of this consultation.</p>
	<p>C) Community and social issues? As above</p>
	<p>D) Environment? It is considered that there might be significant adverse impacts upon local environments, especially within Allerdale, Carlisle and SLDC.</p> <p>Within South Lakeland District, the level of new housing at 400 dwelling units per annum in the Proposed Changes to RSS would be near to the environmental capacity of their area to absorb further development.</p>
	<p>E) Economy? The increased housing provision would support increased opportunities for people to move into Cumbria to take up employment opportunities, and thereby contribute towards an improvement in the skills base and aspiration for potential GVA growth comparable with the remainder of the North West. The policy for local occupancy would be consistent with this objective.</p> <p>However, any housing growth must be planned alongside expected economic growth and identified employment needs, and take proper account of the impacts upon local infrastructure.</p>
<p><i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.</p>	<p>A) Delivery: See response to Question A1.1 Point 3 above.</p>
	<p>B) Infrastructure provision? As set out in answers to Question A2.1 above.</p>
	<p>C) Community and social issues? As set out in answers to Question A2.1 above.</p>
	<p>D) Environment? As set out in answers to Question A2.1 above.</p>
	<p>E) Economy? As set out in answers to Question A2.1 above.</p>