



PARTIAL REVIEW OF REGIONAL
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A3.2
June – July 2008

CONSULTATION REPORT

North West Regional Assembly

PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A3.2

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 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.

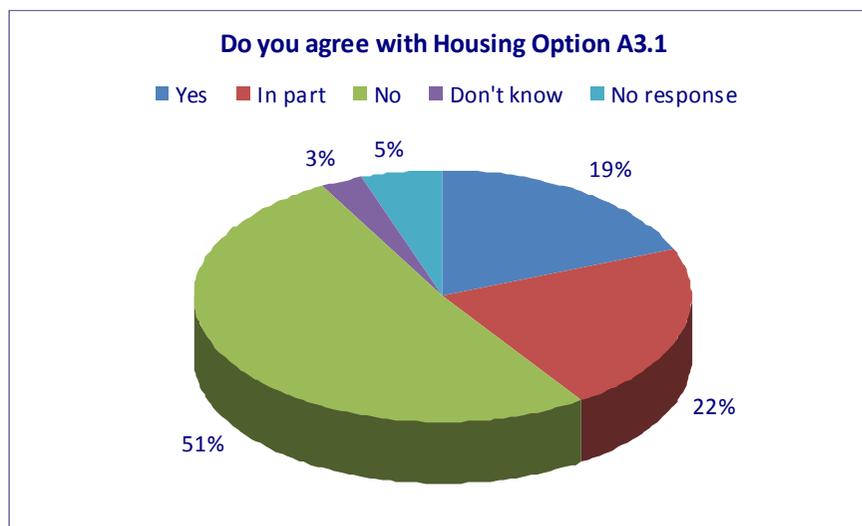


1 Questionnaire Responses

1. Do you agree with Housing Option A3.2?

Do you agree with Housing Option A3.2?	
Yes	8
In part	8
No	21
Don't know	1
No response	2
Total Responses	39

The table below shows the verbatim comments received.



Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Northwest Regional Development Agency	In part	We acknowledge the intention behind considering an alternative spatial distribution as part of the options paper, namely to take account of concerns raised by the Affordable Rural Housing Provision and the Commission for Rural Communities as to levels of housing provision in rural areas proposed by Draft RSS. However, we feel that any proposed spatial distribution should be sufficiently flexible to allow both for the accommodation of any successful growth points within the region and any spatial priorities which may emerge from work on the Regional Strategy commissioned by the Regional Strategy Team. Whilst the need to ensure an adequate provision of rural housing is an important objective in itself, equally desirable is ensuring sufficient flexibility in order to accommodate any successful housing growth points. Whilst there may be a tension in achieving both these aims, we feel that the principle of achieving a		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>balance should nonetheless be central to the development and testing of any proposed alteration in the spatial distribution of future housing provision. The option paper states that the Partial Review will utilise identified Housing Market Areas (HMA) as spatial building blocks, in line with PPS3 requirements, and that within this framework, RSS will also set out housing figures for each Local Planning Authority (LPA). As it is intended that housing provision will be determined in line with HMAs, building upon the NWRA commissioned Strategic Housing Market Assessment work, it would be desirable to set out the proposed methodological approach to disaggregating housing figures at the LPA level. We anticipate the opportunity to comment upon any proposed methodology during the course of the Partial Review.</p>		
Indigo Planning Limited	In part	<p>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>		
Bartonwillmore on behalf of Paycause Ltd	No	<p>Paycause considers the Liverpool City Region is a key area in accommodating growth in the NW to meet the RSS spatial policy. It is noted that it is diverse in terms of settlement scale and pattern. our clients believe that Chester plays a key role in the LCR and wider region where it is also acknowledged by this Housing Options Paper that there are cross boundary issues with Flintshire, and W Cheshire of which Chester falls within. therefore in order to deliver the core approach our clients do not consider it appropriate to distribute growth toward more rural areas, which may lead to a more unsustainable pattern of development. It would be more appropriate to concentrate on "higher order" settlements such as Chester whose hinterland could accommodate further growth that is deliverable.</p>		
Environment Agency	No	<p>The Environment Agency's comments to option A2.1 apply. As for option A3.1 the additional 100,000 homes proposed under this option will increase any pressures on the environment and any infrastructure capacity issues compared to lower growth options. Consideration is also needed around the implications of the more rural focus of this option on the environment and infrastructure capacity. Therefore, before any option proposing this level of growth is progressed, we would expect it's 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.</p>		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
GONW		As per general comments on rural redistribution. Concerns about the potential for rural redistribution to lead to an undermining of the spatial framework and to unsustainable consequences from dispersed development, poorly served by public transport, would be exacerbated by the increasing numbers of dwellings in rural areas further as per option A3.2.		
Halton Borough Council	No	The shift towards rural provision (options A1.2, A2.2 and A3.2) would see the balance of housing in the major urban areas – the Liverpool and Manchester City Regions – reduced, in the expectation that providing a greater proportion of housing in the rural areas would help to tackle affordability problems in those areas. This would represent a major shift in the spatial priorities of RSS, and would potentially undermine efforts to revitalise the urban parts of the region.		
Preston City Council	No	Would accommodate growth point needs but in addition to comments as for A3.1 would put additional pressure on rural areas.		
National Trust	No	First and foremost it is considered that overall new development should maintain an urban focus having regard to the sustainable location of new development and the availability of infrastructure. An added emphasis on rural housing is best addressed through local assessments of requirements and allocations either at Housing Market Area level or in individual LPAs LDFs.		
Blackpool Council	No	The implications of this redistribution in practise would directly and very markedly conflict with the key spatial priorities fundamental to NWRSS and national planning policy guidance, and would have huge implications for the patterns of delivery of new housing development against Policy RDF1. This scale of change is not justified, nor could it ever be delivered in appropriate locations. The redistribution seems a huge over-reaction to the concerns raised by the Affordable Rural Housing Commission and the Council for Rural Communities. Other rural lobbies and the communities in these areas may have different views – and these changes seem to go to the very heart of NWRSS. Against the A1.1 figures, these A3.2 figures represent a significant increase from the figures for the main Manchester and Liverpool City Regions. However, their delivery would be undermined by the major re-focusing of increased provision in the rural areas. The figure for the Central Lancashire City Region represents an increase of 82% over current NWRSS figures. In Cumbria and North Lancashire it represents a		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		more than doubling of future growth (118%) – a huge rise in total numbers. This scale of change would have an extreme impact on the ground, implying major development and expansion - whilst at the same time undermining growth and sustainable development RDF priorities in the main urban areas		
Local resident	No	Policy RDF1 prioritises growth lastly to the rural areas (including all of Eden). The redistribution option and other higher numbers options and their similar rural redistributions are totally unrealistic, and it is hard to think have been properly thought out. Such a redistribution directly conflicts with the key spatial priorities fundamental to NWRSS, is unjustified, and could never be delivered. The redistribution seems to be based on affordable housing concerns which are now across much of the country, and to population forecasts based on a continuation of unsustainable further inward local in-migration, rather than meeting local needs. The impact in rural locations is extreme. In Cumbria and North Lancashire, the increase from 9.5% to 15% represents a huge rise of over 60% in total numbers. This would have an extreme impact on many rural areas.. In districts like Eden this will lead to what can only be described as ridiculous levels of planned growth.		
Lancashire County Council	In part	This Option would be best able to accommodate the levels of growth envisaged in the submitted Central Lancashire, Blackpool Growth Point Expression of Interest. An increase in the level of provision in rural areas to address the concerns of the Affordable Rural Housing Commission and the Council for Rural Communities is supported in principle. It is not entirely clear how the sub regional shares in the alternative spatial distribution have been established.		
Cheshire West and Chester (comments represent informal officer views)	No	Similar concerns to those set out in our response to A3.1. Option A3.2 would not be acceptable in our view. With increased rural apportionment, Central Lancs, Cumbria and N Lancs and S Cheshire would need to deliver housing at a level 82%, 119% and 108% respectively above emerging RSS targets. This is unrealistic and it is difficult to see how this could happen in a way that met other important sustainability objectives. This could seriously undermine urban regeneration and renewal in the Manchester and Liverpool City Regions.		
Macclesfield Borough Council	No	This would have the effect of decreasing the proportion of provision in the Manchester and Liverpool City Regions and increasing the proportion in the Central Lancashire City		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>Region, Cumbria and North Lancashire. 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 top-down approach is not needed and conflicts with the rural affordable housing strategy. 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 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,</p>		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>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, 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.</p>		
Haslington Parish Council	No	Increased burden on rural communities to host additional housing.		
The Planning Bureau	Yes	Irrespective of the level of housing provision, policies dealing with the delivery of		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		housing should ensure that there is a variety in terms of type and tenure to ensure that the housing needs of the Region are met. In particular, given the likely growth in the elderly population, policies should promote the provision of a range of housing option to meet the needs of this ever growing portion of the population. Policies should reflect the advice contained in the National Strategy for Housing in an Ageing Society which encourages greater provision of all types of specialised accommodation for the elderly. The RSS Housing Policies should also dovetail with the aims and aspirations of the Regional Housing Strategy which seek to ensure that there is adequate, high quality housing provided for all.		
Merseyside Policy Unit	No	The shift towards rural provision (options A1.2, A2.2 and A3.2) would see the balance of housing in the major urban areas – the Liverpool and Manchester City Regions – reduced, in the expectation that providing a greater proportion of housing in the rural areas would help to tackle affordability problems in those areas. This would represent a major shift in the spatial priorities of RSS, and would potentially undermine efforts to revitalise the urban parts of the region, and therefore they are not options which we could support.		
Charles Topham Group Ltd	Yes	The housing land supply needs to increase to allow house and land prices to better align themselves with the ability for people to buy and to meet the future needs.		
Copeland Borough Council	In part	We agree with the level of provision but would wish to see the Review include a new 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	It is considered that the higher end of the range may not be capable of being delivered and further technical work would be required to support any proposed distribution particularly in locations where significant increases in provision are proposed.		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Satnam Planning Services Ltd	In part	Whilst this option may produce the requisite level of housing within the region, increased provision in the rural parts of the region at the expense of the urban centres will lead to an imbalance in provision and encourage unsustainable forms and locations for growth		
Carlisle City Council	In part	This level of growth would clearly be excessive in a cumbrian context however a redistribution from the existing spatial strategy may assist in delivering economic growth and could be factored into the targets for housing. A figure as high as this does however raise challenges as to delivery and impact on the environment at the local level.		
West Lancashire District Council	No	See comments relating to Option A2.1.		
Ribble Valley BC	No	not appropriate for the area		
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 based 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 housing land availability. However, not all LPAs are at the same stages of the LDF and therefore may not have up-to-date information. We support the decision to review the spatial distribution in general terms. However, we question what basis is the justification for revising the spatial distribution to reflect the MSOA and the lower quartile earnings to lower house prices only. This fails to recognise the potential regeneration needs of those settlements not within the Manchester and Liverpool City regions. How do you know these percentages accurately reflect all housing needs outside the two City regions? On the basis that the current housing provision was skewed towards encouraging investment in to the areas of need in Manchester and Liverpool City regions it is not unreasonable to include other areas in need of regeneration.		
Allerdale Borough Council	No	This option more than doubles the housing figure for Cumbria over the "Proposed Changes" figure and involves a scale of development that would bring significant		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		problems of deliverability, significant adverse environmental impact and widespread infrastructure problems. As with other high figures, this would, in theory facilitate the delivery of affordable housing and the aspirations for economic growth. However, it is considered that the problems of deliverability would be insuperable.		
Emerson Group	In part	Do not agree with the fairly significant shift in % distribution. Would agree a smaller scale adjustment. Key to success of the Region is the competitive status of Manchester and Liverpool City Regions. The good work of the last 10 years should not be diluted by a reaction to the proposals of the Rural Housing Commission which seeks to re-address a self inflicted shortage of housing in rural areas occasioned by restrictive housing policies. How sustainable a solution is such a dramatic redistribution of development?		
LDNPA	No	For all the reasons set out before. We need to be realistic, reflect known local need based on robust evidence and be mindful of the availability of land and resources. Evidence from our SHLAA, local needs surveys; Parish Plans, etc suggest this figure is unrealistic. Needs to reflect local circumstances and the special qualities of the LDNP. A bottom up approach rather than top down.		
GVA Grimley (on behalf of Goodman)	In part	Support is offered for pursuing the higher end of the range of housing numbers advised by the NHPAU, however, as previously stated increasing rural housing provision is not sustainable as a general policy concept. It is stated that this approach is to provide flexibility to accommodate any successful growth point bid yet this sends a very mixed message in terms of new development and goes against the Government's wider sustainability objectives.		
Wirral MBC	In part	Wirral would only be able to accommodate the level of change anticipated (circa 22%) if the Liverpool/Wirral Growth Point bid was accepted.		
Pendle Borough Council	No	The changed spatial distribution is likely to mean a significant increase in the annual housing provision figure for Pendle. The SHMA for Burnley and Pendle indicates that there is a gross overall demand for new dwellings in the Pendle area. The SHMA identifies an annual provision figure of 275 dwellings which is lower than the figure proposed in this option. The annual figure for Pendle under this option (calculated as 322dpa based on the current percentage split between authorities across the Central Lancashire City Region) is higher than the current average annual build rates within the		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		borough which stand at 270dpa (over the last 5 years). It is possible that build rates may not be able to meet the higher requirement of 322pa. The current local evidence base regarding housing demand in Pendle does not support such a high annual provision rate.		
Congleton Borough Council	Don't know	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: <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. 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.		
NW Transport Roundtable	No	See earlier comments		
Cheshire East Council	No	As in option A2.2 it is not considered appropriate to increase the level of housebuilding in rural areas. When combined with an overall increase in provision, this could lead to excessive and inappropriate development in rural areas. The level of growth suggested for south Cheshire would be at a higher level of completions than at any time over the past 20 years.		
Cumbria County Council / Cumbria Strategic Partnership	No	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 A3.2 that the figure of 4,800 for Cumbria and North Lancashire should necessarily mean that Cumbria would retain the current proportionate split of the Proposed		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>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 A3.2 would, in effect, increase the annualised housing requirement from 1,796 dwelling units in Cumbria to 3,926 units per year, which equates to 118.6% (i.e. %x 4,800-2,196 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 - 584; Barrow - 328; Copeland - 503; Eden - 522; SLDC - 874; LDNPA - 131; and Carlisle - 984 units.</p> <p>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>Whilst this Option would increase flexibility to accommodate affordable housing provision, there will be very significant implications for the environmental capacity of Cumbria to absorb this level of new housing development, especially within the rural parts of Cumbria. There is concern in South Lakeland that the level of new housing (400 new dwelling units per annum) identified in the current Proposed Changes to RSS is near to the environmental capacity of their area to absorb new development.</p> <p>A 118.6% increase would therefore be likely to have major adverse effects upon the environmental capacity and infrastructure in all parts of Cumbria, which are not considered sustainable.</p> <p>Notwithstanding these points, 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</p>		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>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. Even with the growth scenarios envisaged in the Energy Coast master plan, it is considered that Option A3.2 is likely to be well beyond deliverability.</p> <p>The significant 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>It is for this reason that it would 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 would best be identified on the evidence of the Cumbria-wide Strategic Housing Market Assessment.</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</p>		

Organisation:	1. Do you agree with Housing Option A3.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		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.		
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	Yes	See our response to Question A3.1 above. See our response to Question A1.2 above regarding distribution. We agree that this distribution more reflects the demand for new housing provision.		
Crewe and Nantwich Borough Council	No	As in option A2.2 it is not considered appropriate to increase the level of housebuilding in rural areas. When combined with an overall increase in provision, this could lead to excessive and inappropriate development in rural areas. The level of growth suggested for south Cheshire would be at a higher level of completions than at any time over the past 20 year.		

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?
Northwest Regional Development Agency	
Indigo Planning Limited	
Bartonwillmore on behalf of Paycause Ltd	Option not supported
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.
GONW	
Halton Borough Council	
Preston City Council	
National Trust	Given the likely very large 'surplus' of allocations at least in the next few years it will be important to have phasing policies in place so that initially development is directed to where it is most needed to meet social, economic and environmental objectives, rather than 'easy' sites being picked off first that are less beneficial.
Blackpool Council	Such a redistribution would require a fundamental review of the spatial priorities and focus of many of the policies throughout NWRSS.
Local resident	
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 per annum to 2032 in the North West as a whole. The alternative spatial distribution lacks sensitivity to the needs of individual housing market areas. West Lancashire district is in the Liverpool City Region. Excluding Skelmersdale, West Lancashire is a largely rural district with affordable housing needs. The alternative spatial distribution seeks to give rural areas a greater share of the regional housing provision. The reduced share of the regional housing provision of the Liverpool City Region could mean that the effect in West Lancashire would be offset by the greater amount of housing provision.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
Cheshire West and Chester (comments represent informal officer views)	
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.
Haslington Parish Council	Need to ensure protection of rural areas
The Planning Bureau	
Merseyside Policy Unit	
Charles Topham Group Ltd	Consideration needs to be given to the creation of sustainable rural communities with both a residential and employment function as well as the necessary services for day to day life.
Copeland Borough Council	
RPS Planning	
Satnam Planning Services Ltd	
Carlisle City Council	
West Lancashire District Council	
Ribble Valley BC	
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

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	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. Revise Policy SD1 of the RSS and Policy RDF1 of the emerging RSS to reflect the revised spatial distribution emphasis.
Allerdale Borough Council	This option would necessitate a considerable shift in the spatial development framework regionally and a change in policy for the distribution between Key and Local Service Centres. Local Service Centres would have to provide a significant proportion of such figures, to such an extent that sustainable principles could be compromised, contrary to national guidance.
Emerson Group	There would have to be quite wholesale reconsideration of spatial strategy policy in Chapters 4 and 5 of the RSS and consequential balancing of other Chapters.
LDNPA	If the LDF works according to how the Government originally intended, then it offers the flexibility to adapt to changing local circumstances. It mirrors the 'Plan, Monitor Manage' approach so lets give it a change to prove it can happen.
GVA Grimley (on behalf of Goodman)	No comments.
Wirral MBC	
Pendle Borough Council	Consideration needs to be given to how this option would impact on the HMR initiative which is operating in parts of the Central Lancashire City Region. Consideration also needs to be given to the impact increased housing figures will have on empty properties. If the demand for this increased level of housing does not exist then the problem of empty properties could be aggravated.
Congleton Borough Council	
NW Transport Roundtable	See earlier comments
Cheshire East Council	
Cumbria County Council / Cumbria Strategic Partnership	There are likely to be very significant 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 would require reconsideration given that the scale of development would effectively more than double current Proposed Changes RSS housing figures.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	<p>It would 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 future aspirations for growth in West Cumbria through the Energy Coast master plan, and the wider environmental constraints within Cumbria.</p> <p>It is considered if the level of development proposed in Option 3.2 were to be implemented, there would be significant problems for those LDFs already at an advanced stage of preparation, as well as those Local Plans recently adopted.</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.

Organisation:	3. In taking forward this option, what are the implications for:
Macclesfield BC	<p>A) Delivery: Suggesting an urban / rural redistribution based on sub-regions does not enable all districts to assess the potential impact on their housing figures. Macclesfield is a relatively rural district within a very urban sub-region. It is unclear whether this proposed redistribution would lead to a higher figure in Macclesfield based on its rural nature, or a lower figure based on its inclusion in the Manchester City Region.</p>
	<p>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.</p>
	<p>C) Community and social issues? Increasing general market housing provision in rural areas would not necessarily address rural housing problems but more likely become a 'commuting policy'. It is likely to lead to further unsustainable commuting patterns into urban areas and increase pressure on the transport infrastructure. Removing the focus of development away from urban areas may undermine the significant regeneration efforts in these areas, especially with the prospect of a weakened economy. It is also noted that there is no mention of the sustainability of locations for rural housing. If there is to be an increase in the level of housing in rural areas, this should be in sustainable locations with good access to shops, services and public transport</p>
	<p>D) Environment? The draft SHLAA indicates that increasing the level of housing provision in Macclesfield is likely to require incursions into the Green Belt.</p>
	<p>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.</p>
Indigo Planning	<p>A) Delivery: -</p>
	<p>B) Infrastructure provision? -</p>
	<p>C) Community and social issues? -</p>

Organisation:	3. In taking forward this option, what are the implications for:
	D) Environment? -
	E) Economy? -
Northwest Regional Development Agency	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Environment Agency	A) Delivery: he 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.
	B) Infrastructure provision? 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 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: Option not supported
	B) Infrastructure provision? Option not supported
	C) Community and social issues? Option not supported
	D) Environment? Option not supported
	E) Economy? Option not supported
GONW	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -

Organisation:	3. In taking forward this option, what are the implications for:
	D) Environment? -
	E) Economy? -
Preston City Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Halton Borough Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
National Trust	A) Delivery: No additional comments.
	B) Infrastructure provision? Infrastructure capacity would be an even greater constraint than with the other options, and a more expensive issue to resolve, in more remote locations.
	C) Community and social issues? No additional comments.
	D) Environment? Potentially there will be insurmountable issues in terms of the impact of development upon landscape character and upon natural and built environment assets and their settings.
	E) Economy? No additional comments.
Blackpool Council	A) Delivery: It will undermine delivery of the sustainable urban development focus of NWRSS and have a major impact on the appearance and character of many rural settlements across the region
	B) Infrastructure provision? It will result in a re-focus of more dispersed provision away from the main centres - where existing infrastructure and facilities are concentrated, and future expansion of provision can be better planned and delivered

Organisation:	3. In taking forward this option, what are the implications for:
	<p>C) Community and social issues? It will undermine the urban regeneration focus of Policy RDF1 and change the longstanding role and character of many smaller settlements if delivery took place in accordance with this redistribution.</p>
	<p>D) Environment? It will undermine the urban regeneration focus of Policy RDF1 and change the longstanding role and character of many smaller settlements if delivery took place in accordance with this redistribution.</p>
	<p>E) Economy? The redistribution of housing will redistribute jobs to some extent, but also hugely increase commuting – contrary to the main need to focus new employment and matching housing growth in the main towns and cities where existing facilities and needs are concentrated.</p>
Individual	<p>A) Delivery: -</p>
	<p>B) Infrastructure provision? -</p>
	<p>C) Community and social issues? Eden’s main town of Penrith may have moderate capacity for some further growth, but it has taken a few hundred years of history to take Penrith to where it is today as a town of 15,000 people. The redistribution figures imply that all of a sudden, in one plan period, it should then expand by 60%. The higher A2.2 and A3.2 options imply it should double in size, along with similar massive expansion in all Eden’s sizeable settlements (the second biggest Appleby, currently having only 2,900 residents). This, in technical terms, is mad, and implies a small town and villages which in other locations (even without the special landscape qualities and designated status that are so much to the fore in Eden) would be dismissed as totally inappropriate for growth. Some sanity and realistic analysis of the sustainability of what is being proposed needs to be returned to the NRWSS process.</p>
	<p>D) Environment? -</p>
	<p>E) Economy? -</p>
Lancashire County Council	<p>A) Delivery: -</p>
	<p>B) Infrastructure provision? -</p>
	<p>C) Community and social issues? -</p>
	<p>D) Environment? -</p>
	<p>E) Economy? -</p>

Organisation:	3. In taking forward this option, what are the implications for:
Cheshire West and Chester <i>(comments represent informal officer views)</i>	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Haslington Parish Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	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.
	E) Economy? -
Merseyside Policy Unit	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? This option would potentially require the significant release of green belt land for housing.
	E) Economy? We consider that adopting this option, by shifting the balance of housing provision away from the major conurbations, could undermine regeneration efforts - especially housing-related - in those areas.
Copeland Borough Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -

Organisation:	3. In taking forward this option, what are the implications for:
RPS Planning	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Satnam Planning Services Ltd	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Carlisle City Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Ribble Valley Borough Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Lambert Smith Hampton	A) Delivery: Unable to fully comment on deliverability of increased housing provision figures until they have been fully tested and the Housing Land Availability Assessments have been carried out throughout the region.
	B) Infrastructure provision? An increased requirement for additional housing would lead to an

Organisation:	3. In taking forward this option, what are the implications for:
	<p>opportunity for an improvement in the existing infrastructure as new developments are brought forward in both the city regions and other areas within the region including rural areas.</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 person households and older people. The revised spatial mix will widen the choice of housing throughout the region.</p> <p>D) Environment? This option would support the regeneration of brownfield sites across the region and improve the quality of the housing stock. It would also reduce the potential of skewed investment within the city regions of Manchester and Liverpool.</p> <p>E) Economy? Investment would be encouraged in to the region as a whole and would be more evenly distributed.</p>
West Lancashire District Council	<p>A) Delivery: -</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: It is considered that the barriers to the delivery of this option are insuperable.</p> <p>B) Infrastructure provision? There would be significant and widespread infrastructure constraints.</p> <p>C) Community and social issues? Health and education capacity constraints would be widespread.</p> <p>D) Environment? There would be significant environmental capacity constraints in certain areas.</p> <p>E) Economy? As before such figures could facilitate the delivery, in a shorter period, of affordable housing and economic growth. However, deliverability issues would be insuperable.</p>
Emerson Group	<p>A) Delivery: May result in additional delays over Option A3.1 whilst LDD's are restarted or revised to suit the altered distribution. Land would have to be found and acquired in areas previously restricted in development terms.</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>B) Infrastructure provision? Would require re-appraisal as the priorities have been to service the main urban areas.</p> <p>C) Community and social issues? Would benefit the sustainability of some rural communities provided that expansion was not at the expense of the scale and functionality of those communities. Would maintain local services.</p> <p>D) Environment? Some reconsideration of environmental priorities would be needed. Review of Green Belt boundaries may be required earlier than previously anticipated.</p> <p>E) Economy? Would have to marry opportunity and need at a more detailed level.</p>
LDNPA	<p>A) Delivery: -</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? -</p> <p>E) Economy? -</p>
GVA Grimley (<i>on behalf of Goodman</i>)	<p>A) Delivery: See response to A1.2</p> <p>B) Infrastructure provision? See response to A1.2</p> <p>C) Community and social issues? See response to A1.2</p> <p>D) Environment? See response to A1.2</p> <p>E) Economy? See response to A1.2</p>
Wirral MBC	<p>A) Delivery: -</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? -</p> <p>E) Economy? -</p>
Pendle Borough	<p>A) Delivery: A large amount of land would be required to achieve the level of housing provision proposed in this option. The SHLAA for Pendle indicates that over the next 15 years there is land</p>

Organisation:	3. In taking forward this option, what are the implications for:
Council	available to provide 3,359 dwellings. This would be less than half of the requirement and therefore further land would need to be identified. This additional land is likely to be greenfield.
	B) Infrastructure provision? This level of housing provision would require significant infrastructure improvement and additional provision in both urban and rural areas.
	C) Community and social issues? This level of housing provision would require an increase of community facilities e.g. schools, healthcare etc.
	D) Environment? Higher levels of house building may require the use of some greenfield sites to meet the provision figures. This will invariably change the landscape in Pendle.
	E) Economy? Employment in the Borough would also need to be increased in order to support the increase in population.
Congleton Borough Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
NW Transport Roundtable	A) Delivery: See earlier comments
	B) Infrastructure provision? See earlier comments
	C) Community and social issues? See earlier comments
	D) Environment? See earlier comments
	E) Economy? See earlier comments
Cheshire East Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -

Organisation:	3. In taking forward this option, what are the implications for:
The Planning Bureau	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Charles Topham Group Ltd	A) Delivery: Local Authorities will actually have to proactively allocate land rather than the current situation where it is predominantly windfall housing. How many allocations DPD's are there adopted in the North West? How many core strategies are there? Not very many. Local Authorities have to be told to bring there emerging DPD's into line with the partial review. They also need to be told to stop all housing supply restriction policies and deal with it properly through SHLAA's and allocations.
	B) Infrastructure provision? This will need to be carefully considered so as to direct new developments to sustainable locations where there is existing infrastructure capacity. At present there is little public information that is readily available on this.
	C) Community and social issues? Facilities will need to be provided to match needs arising from new developments and Local Authorities investments should all clearly be directed at creating sustainable communities.
	D) Environment? This needs to be considered in detail by LPA's but there should be some relaxation of the Greenfield vs Brownfield issue to allow for delivery of a greater range of housing types, particularly in rural areas.
	E) Economy? Economic development needs to reflect residential and jobs should be created near new residential areas.
Cumbria County Council / Cumbria Strategic Partnership	A) Delivery: As above. The proposed annualised requirements would also be significantly above historic planning permission and completion trends in Cumbria. It is not clear as to whether developers/house builders and RSLs would be able to respond to this level of development.
	B) Infrastructure provision? There are likely to be major infrastructure implications for the provision of health, community, education, highways and transport, as well as ensuring there are proper links to employment and retail provision.

Organisation:	3. In taking forward this option, what are the implications for:
	It is not possible to give a definitive answer to this issue within the timescale of this consultation, and would require further work.
	<p>C) Community and social issues? As above.</p> <p>It is expected that there would need to be a significant increase in the level of infrastructure provision for education, health and community facilities, alongside increase provision for retailing and employment.</p>
	<p>D) Environment? As stated above, there are likely to be significant implications for environmental capacity, especially within West Cumbria, South and East Cumbria and Carlisle, which contain large rural hinterlands. This option is not considered sustainable.</p> <p>In South and East Cumbria, there will be very significant capacity problems, given the rural nature of these areas and existing landscape/natural habitat designation constraints.</p>
	<p>E) Economy? The increased housing provision would nevertheless 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>
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	A) Delivery: See response to Question A1.1 Point 3 above.
	B) Infrastructure provision? As set out in answers to Question A2.1 above.
	C) Community and social issues? As set out in answers to Question A2.1 above.
	D) Environment? As set out in answers to Question A2.1 above.
	E) Economy? As set out in answers to Question A2.1 above.