



PARTIAL REVIEW OF REGIONAL
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing D
June – July 2008

CONSULTATION RESPONSES

North West Regional Assembly

PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing D

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



Contents

Introduction to this report

Questionnaire Responses by question

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.

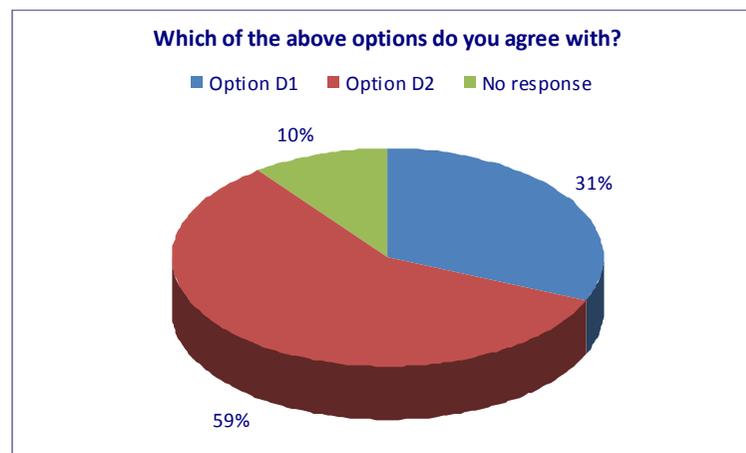
The consultation activity is discussed in more detail in the full project report. This report outlines what people told us about the options in these themes through the methods outlined above.

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 & 2. Which of the above options do you agree with? Please explain:

Which of the above options do you agree with?	
Option D1	16
Option D2	31
No response	5
Total Responses	51



The table below shows the verbatim comments received.

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
PRS FOR PERSIMMON HOMES (LANCS) LTD AND PRIME RESORTS LTD	Option D2	We support Option D2 as we consider that each Housing Market Area has individual characteristics which will warrant individual responses to address affordability issues
Macclesfield Borough Council	Option D1	Macclesfield Borough Council supports the inclusion of targets for affordable housing provision for the region and each housing market area. Although either option would be acceptable, it is considered that as affordable housing need is usually expressed in absolute numbers, it would seem sensible to also express the target in absolute numbers (option D1) rather than as a proportion of the overall housing provision (option D2). The Macclesfield Strategic Housing Market Assessment, produced by Ecotec for Macclesfield Borough Council in early 2008 identifies an overall annual shortfall of 198 affordable housing units per year.
Indigo Planning Limited	Option D2	CEG do not support the setting of an absolute affordable housing target, rather a proportional target, to allow flexibility for local authorities to deal with affordable

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		housing at a local level with provision based on local needs and the consideration of site specific issues in terms of viability and suitability
National Housing Federation	Option D1	The long term aspiration for the North West is for mixed communities, and increasing owner occupation has been seen as a way of achieving this. However current projections suggest that we face a decline in owner occupation in the coming years. The current financial downturn indicates that developers are dramatically reducing their building programmes. In this environment, a proportional target is not likely to deliver many affordable homes. Housing associations and their partners are developing a range of flexible tenure models such as “rent now, buy later” and equity incentives enabling tenants to save for a deposit. Housing associations are also actively responding to the worklessness agenda through a range of innovative projects and working alongside their LA partners in developing wider initiatives through Local Area Agreements and Multi-Area Agreements. This work will contribute to the development of flourishing mixed communities. Building more affordable homes now will enable us to start to address the housing shortage, and provide employment in the building industry.
NWDA	Option D2	We acknowledge that Partial Review will need to provide an overall target for the provision of affordable housing for the region in line with PPS3 requirements. However, we are concerned that any target proposed should take account of market feasibility and associated impacts upon delivery. Given that a large proportion of the region’s affordable housing requirements will be delivered through private sector development via s. 106 agreements; providing private sector house builders with a policy context that is clear, concise and deliverable is a key concern. This is particularly so given the current economic climate. We feel that balancing these considerations alongside more specific knowledge of local needs and circumstances is a matter for individual Local Authorities to determine. We would therefore suggest that a percentage target for affordable housing, as outlined in Option D2, would be most appropriate providing that Local Authorities are able to interpret this flexibly in line with local circumstances, emerging evidence base studies or through trends identified as a result of ongoing monitoring.
Countryside Properties.	Option D2	Option 1 would provide a specific number of dwellings that must be delivered, which may prove to be too rigid to reflect changes in housing markets and rates of housing

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		delivery over time. Option 2 should therefore be pursued.
Bartonwillmore on behalf of Paycause ltd		Neither option until further evidence is produced. Paycause is concerned with the opening paragraph above, especially targets being "at least". There is need to consider the reality of how the "targets" could affect deliverability of all types of housing, both market and affordable. In some instances too high an affordable housing requirement undermines the viability of a development proposal, the consequences of which is that no development is delivered, which exacerbates the issue of affordability further. There is therefore a need for a balanced approach to delivery of affordable housing, which needs to acknowledge other issues which may also be required to bring forward a development for example, transport/road improvement. Paycause is also concerned of how "targets" could be applied by Local Authorities and what may happen if they are not meeting the targets? A consequence may be that they increase their requirements to meet potential shortfall. Therefore Paycause reserves the right at this stage to not support either option until further evidence is put forward to provide a more informed opinion.
HBF		We note that the consultation questionnaire includes a question on deliverability for all options proposed. We would like to submit the following overall comment in relation to this issue - While we acknowledge we are at the beginning of a period of adjustment in the housing market and there is a focus on short-term prospects and some uncertainty arising from this, as stated in 'Meeting the housing requirement of an aspiring and growing nation' (NHPAU June 2008) there is a need for planners and decision makers, including yourselves at the Regional Assembly, to plan for the medium and long term. The NHPAU advice is based on long term needs and we are supportive of the approach taken by them. As mentioned above, we would argue that options for overall housing provision should be based on this work and the ranges proposed. There have always been ups and downs in the housing market but the trend in prices is upwards. This cycle and trend will not be moderated until we have properly addressed supply, delivering the right number of new homes, of the right type, in the right place and at the right time.
GONW	Option D2	it is considered that this would be the more deliverable option.
Halton Borough Council	Option D2	The second of these options is supported. Setting an absolute target does not make

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		sense in the context of housing market fluctuations; a proportional target would be a more practical way of dealing with this issue.
Preston City Council	Option D2	Option D2 would allow for sub-regional differences in need and more closely reflect specific requirements at a local housing market level.
National Trust	Option D1	A proportion target would not have a need-led basis – an absolute target should relate to what is needed.
Blackpool Council	Option D1	On balance, given affordable housing needs are based on local assessments of an identified quantum need, it would be clearer, simpler and more logical if an absolute target was set.
National Housing Federation	Option D1	Future projections for owner occupation suggest that we may be facing a decline in owner occupation in the coming years. Current thinking in response to the financial downturn, and in response to the worklessness and Hills Review suggests that there is a need for more flexible tenures - for example "rent now buy later" and equity incentives. These factors suggest that the priority needs to be on building more affordable homes rather than as a percentage. While the long term aspiration is for mixed communities, this could be achieved through changes to tenure at a later stage. Housing Associations are independent not-for profit organisations, governed by Boards which include tenants. They are able to maximise the benefits of grant through borrowing and pump profits back into the delivery of decent affordable homes. Their quality is monitored by the Audit Commission and regulated by the Housing Corporation (TSA in future) Rent increases are limited by government. Housing associations offer high quality affordable homes and a commitment to the neighbourhoods and communities they serve. Through flexible tenure options they offer an excellent delivery vehicle for developing more affordable homes
South Lakeland District Council Development Plans Team	Option D2	We support option D2: a proportionate target (percentage of the overall housing provision for the regional and each housing market area). Having a proportionate or absolute target for affordable housing provision in each housing market area in the RSS will certainly influence our ability to specify policy requirements for affordables in the Core Strategy. Whilst a regional target will not undermine our approach as it will be expected that some authorities will have targets higher than the regional target and some below it, the same cannot really be said for the housing market areas targets.

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		Whilst these don't fall neatly within our district boundary, such figures in the RSS will be significantly more prescriptive and therefore give us less room for manoeuvre at a local level. A proportionate target would appear to be more in keeping with the flexibility of overall housing numbers not being maximums etc. An absolute target is less flexible.
Lancashire County Council	Option D2	Option D2 is supported in principle. To recognise local circumstances, a target would be required for each housing market area.
Sustainable Neighbourhoods Pool Manchester	Option D1	Option D1 allows for the delivery of affordable housing provision, independently from market housing provision, thus allowing for the achievement of the absolute affordable housing target without building huge amounts of market priced accommodation (which is what developers prefer to build as they receive the highest return.) This would mean priority for the building of affordable housing over the building of market priced housing and would mean that the correct volume of affordable housing could be built and the affordable housing crisis addressed.
Cheshire West and Chester (comments represent informal officer views)	Option D1	<ul style="list-style-type: none"> Regional absolute target should be set. Proportional target for individual HMAs should be determined locally in the light of local housing needs studies. Data gathered for RSS purposes unlikely to be sufficiently robust to set targets for HMAs.
Manchester Disabled People's Access Group	Option D2	Because of the different requirements of each region and sub-region, important to allow level of flexibility, particularly important as the housing market conditions may alter over time and affect the level of investment in the region and in the amount of credit for purchase and rent and of housing allowance available
Haslington Parish Council	Option D1	Needs to be an absolute value. Need to ensure that requirements for rural affordable housing are genuine - piecemeal surveys may overstate the level of demand.
Merseyside Policy Unit	Option D2	Setting an absolute target does not make sense in the context of housing market fluctuations; a proportional target would be a more practical way of dealing with this issue.
Charles Topham Group Ltd		Neither should be included in RSS as local authorities will rely on this figure and have no evidence base in their local area on which to base this requirement. This already happens and results in unproven need but applicants being required to make provision

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		within developments
Copeland Borough Council	Option D2	<p>It is considered that a bottom-up approach, utilising the local Cumbria Strategic Housing Market Assessment to derive a local Cumbria rural requirement for affordable housing provision would be a more sound evidence base to implement at a local level. Furthermore, Cumbrian Authorities have agreed with Government office for the North West to a stretched Local Area Agreement affordable housing target of 260 dwelling units for 2008/2009; 300 dwelling units for 2009/2010; and 350 dwelling units for 2010/2011, which takes account of the identified affordable housing needs arising out of the Cumbria-wide Housing Needs Survey, which was carried out in 2006. The top-down approach in Option D1 is not therefore considered appropriate to local circumstances, and may not be sufficiently sensitive to the locally derived evidence base. PPS3 (Housing) advises that it is a requirement for Local Authorities to carry out Strategic Housing Market Assessments (SHMAs) and Strategic Housing Land Availability Assessments (SHLAAs), and it emphasises the importance of this bottom-up approach to defining local housing needs. In these circumstances, it is considered that of the 2 options, it would be better to have a proportional target to allow District Local Authorities in Cumbria to have the discretion to take account of local specific housing needs assessments that may be commissioned as one-off studies, as well as the results of the Cumbria-wide Strategic Housing Market Assessment and the Housing Needs Survey 2006</p>
Shelter	Option D1	<p>Shelter supports the Government's national target to increase the number of new social rented homes per annum by 45,000 by 2010-11 and the goal to reach 50,000 in the next Spending Review, the latter being the level called for by Shelter in our Comprehensive Spending Review submission and supported by numerous organisations. This is an important first step to addressing housing need. There are several other factors to support this view. The current strategy fails to include any firm targets for the provision of social rented housing, but does recognise that the affordable housing figures will need to be reviewed in light of findings from emerging Strategic Housing Market Assessments. We would like the RSS Review to acknowledge these findings and provide guidance on how the affordable homes to be built between now and 2032 will be split between social rented housing and intermediate housing. Without support for firm targets we are concerned that building of social rented housing</p>

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		in the region will remain low.
RPS Planning	Option D2	Affordability varies between housing market areas and therefore an absolute target for the whole region would be inappropriate. There should be an assessment of the need for housing in different parts of the region taking account of the acute shortages of affordable housing that currently exist. This will help to ensure that affordable housing which is largely provided as part of private housing schemes will be targeted at those areas where the need is greatest.
SATNAM PLANNING SERVICES LTD	Option D1	Each housing Market Area should seek to make absolute provision for affordable housing, these figures represent real needs, not requirements or provision figure to which we should merely aspire, they must be viewed as absolute targets if we are to meet the needs of those in housing need.
Carlisle City Council	Option D2	A proportional target can be more closely related to where the level of need varies throughout the region especially at each housing market area level. This can then be used as a more reliable basis for determine local policies and allocations through the LDF. It is essential that this takes into studies which identify need at a local level indicating priorities for delivery.
Lambert Smith Hampton	Option D2	Option D2 is inline with PPS3 which states that RSS should include the affordable housing target for the region and each housing market area. However, it is also noted that LPAs (and not strategic guidance) should set out an overall (i.e. Plan-led) target for the amount of affordable housing to be provided. To do otherwise would remove the flexibility of providing affordable housing as set out in PPS3 and its companion guide.
Allerdale Borough Council	Option D2	Of the 2 above options we prefer D2, a proportional target. Absolute targets can only reflect snapshot surveys and can become rapidly out of date. Proportional targets are less likely to become out of date rapidly. However, even proportional targets could become inappropriate over time and overall our real preference would be for no target to be stated and for levels of provision to be set locally in LDFs in accordance with up to date local housing need surveys. After all it must be remembered that in the development control process it is local evidence that must be used to justify the approval of affordable housing whether by way of RSL development, "quotas" or "exceptional sites".

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
West Lancashire District Council		The District Council does not agree with either approach. In West Lancashire the amount of affordable housing does need to be maximised to meet whatever need is shown to arise through future evidence base work. However, the delivery of affordable housing is not totally in the hands of the local planning authority. Delivery depends upon finding large enough sites to support affordable housing provision or depends upon monies becoming available through the Housing Corporation. Without the results of a SHLAA it is not possible to say which sites could support affordable housing and to what percentage given the changing market situation. Whilst needing a strong policy which will give local authorities a good basis for negotiating affordable housing with developers, an actual target would be somewhat meaningless. This is particularly the case given the present difficulties in the housing market.
Liverpool City Council	Option D2	It is considered that Liverpool's context, the setting of an absolute target would not be the best approach given the complexities of the city's housing markets; the ongoing need for regeneration in low demand areas; and the context of housing market fluctuations. It is considered that a proportional target would be a more practical way of dealing with this issue. Liverpool would still wish some flexibility here as we would wish to have the evidence of the need for affordable housing and retain flexibility on how the issue is met.
Pioneer Property Services	Option D1	Affordable Housing requirements consist of two elements - backlog need, and newly arising need. Backlog need can be quantified and a target set for its eradication over a fixed period (usually a minimum of 5 years although a longer time frame could be adopted). Newly arising need consists primarily of the inability of newly forming households to access market housing. Therefore affordability for this group is a function of long run house prices which in turn is influenced by supply, and the overall RSS targets and sub-division by HMA. The implications on affordability for each housing growth scenario should be assessed, from which it should be possible to determine an appropriate absolute affordable housing target for each HMA, having regard to existing affordability issues, and proposed new housing numbers. A proportional target may result in more affordable housing being sought than is justified in the long term, one backlog needs have been addressed and increased supply has eased affordability pressures. Paradoxically a proportional target may constrain delivery of housing numbers overall, with an attendant impact on affordability if sufficient regard is had to

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		viability in the setting of the target.
Emerson Group	Option D2	An absolute target will create problems and delay in distribution through the need for Councils to agree a distribution.
LDNPA	Option D2	A proportional target is easier to justify. Local evidence will inform this figure. NWRA will need to work closely with sub-regional authorities to set this target.
GVA Grimley (on behalf of Goodman)	Option D2	A proportional target should be sought in order to ensure that affordable housing is distributed fairly across the region and that requirements are transparent to avoid conflict.
Taylor Young Ltd	Option D2	
Wirral MBC	Option D2	The provision of a specific number may be too rigid to reflect changes in housing markets and in rates of housing delivery over time. The Strategic Housing Market Assessment for Wirral, as in many authorities, recommends a proportional target as a percentage of all new provision. Option D2 would, therefore, fit better with current practice.
Upper Eden Community Plan Group	Option D1	An absolute target conforms better to the intention of PPS3, it is clearer to the public and developers and easier to understand. It will sit better alongside the absolute target for general housing. A proportional figure will cause confusion because within the HMAs identified within the RSS there are sub HMAs which could, and indeed will, have different levels of need for affordable housing. Once the target for affordable housing is set as an 'at least' proportion, there will be no lower tier policy that could reduce that proportion even if the local evidence suggested otherwise. The use of an absolute figure is far more preferable because it allows flexibility within each HMA for LPAs to set locally appropriate proportions.
Pendle Borough Council		These options are potentially the same because a percentage of the overall housing provision figure would yield a number. In either situation it is more important that the figure is derived from an accurate evidence base. It would seem logical for affordable housing targets to be set at a local level using the Strategic Housing Market Assessment for those areas. A percentage figure may be a better option so that it can be applied across the local area. An absolute figure would be potentially difficult to distribute and

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		apply to new developments. It is extremely important that the affordable housing target for the Burnley and Pendle Housing Market area defined in the Partial Review is aligned to and akin with the affordable housing target derived from the Burnley and Pendle SHMA. If these figures were to differ substantially then this may jeopardise the delivery of affordable housing in the housing market area. This would be especially the case if the regional figure for Burnley and Pendle is lower than that derived from the SHMA.
Chorley Council	Option D2	This option would allow for sub-regional differences in need and more closely reflect specific requirements
Congleton Borough Council	Option D1	There appears to be very little difference in how the target is set, it is likely that whichever way they are expressed they could be considered in the alternative manner if needed. What will need to be made clear is that it is not a policy that can be applied to each individual planning application. For example it may not be possible for every development to provide 30% of dwellings as affordable (i.e. only 1 house provided, or where site remediation costs are particularly high), and it may be possible that some developments should provide higher proportions of affordable dwellings. Therefore, it will need to be made clear that overall 30% of the housing provision should be affordable and that this is likely to mean that authorities would be likely to set higher targets in order to meet the overall target. Therefore, potentially to avoid confusion it may be more useful to set the figure as an absolute, rather than a proportional target.
Cheshire East Council	Option D1	Since affordable housing need is usually expressed in absolute numbers, it would seem sensible to express the target also in absolute numbers. As in the case with local Housing Needs studies. But the target should be locally generated, not at RSS level.
Chester City Council	Option D2	The Council acknowledges the need to provide affordable housing, particularly in high demand areas such as West Cheshire, and has adopted a figure of 40% provision in its Supplementary Planning Document on Affordable Housing. Policy for market and affordable housing needs to recognise the limited control that local authorities have over housing delivery and allow for maximum flexibility, especially as local authorities are judged and rewarded on housing targets. Price reductions resulting from unfavourable market conditions can result in developers withdrawing from the market and an associated reduction in the delivery of affordable housing through Section 106

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		<p>schemes. At the same time reductions do not necessarily result in increased affordability, if they are accompanied by the withdrawal of mortgage products that facilitate borrowing with small deposits or no deposits. Over the last few years in Chester over 80% of affordable homes have been built by private developers as a requirement of Section 106 agreements. Because the lead times that developers work to vary according to their work load, market conditions and opportunities elsewhere, while local authorities can grant planning permissions, they have little control over when, or if, development takes place. Absolute affordable housing targets (Option D1) could be difficult to meet – especially if expressed as an annual target - and progress with any one large scheme could result in over provision for one period and under provision the next. The fairest approach would be to express affordable housing targets as a percentage of overall provision (Option D2) – this would allow for variations in market conditions, the differing timescales of developers and the effects of land-banking.</p>
Town and Country Planning Association	Option D2	<p>TCPA supports a flexible approach given the present context of economic uncertainties although in the past we have supported setting minimum targets for achieving affordable housing provision. A proportional target subject to an assessment of needs of individual housing market areas would be an appropriate and responsible mechanism to address current concerns. But such targets should continue to be set high and aspirational in achievement and should not be downgraded to become complacent and passive in delivery, as the underlying needs for homes that are affordable continue to be prevalent across the regions. The key concern for the Assembly should be aspects of affordable housing delivery through the implementation plan not provisions policy. In our scoping research of local planning authorities' local development frameworks, in particular relating to policies for securing affordable housing provision from developer contributions, found that :</p> <ul style="list-style-type: none"> • a number of LPAs having specific planning guidance for planning obligations or developer contributions towards affordable housing, • a wide range of percentage-based affordable housing provision targets between 10% to 50%, and • average target of around 30%. <p>A similar website exercise could be carried out by the Assembly to ascertain whether all LPAs within the region are working to address the housing affordability issue. The TCPA would certainly be willing to contribute to this evidence base. It is our view that the RSS should set an aspirational proportional target and require those LPAs without specific affordable housing guidance</p>

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		to include a SPD within their portfolio of LDF documents as soon as practicable.
CPRE North West	Option D2	<p>Preliminary work indicates that 35-40% of new housing provision in the region should be affordable. It will be easier for local authorities to insist upon percentage quotas if these are established in the RSS. While it may be desirable in some ways to set absolute numbers for affordable housing, given the uncertainties about delivery of housing in the current market conditions, there would be more scope for developers to negotiate down their contributions to affordable housing if there is not an indicative percentage target at regional level. Conversely, if, in the latter part of the plan period, the housing market begins to boom again, there may be the potential to achieve more affordable housing as a percentage of total new build. Different percentage targets could and should be set for different housing market areas, and also for rural areas as opposed to urban ones where there is evidence of particular need. Greater clarity should be established over the requirement to embed / 'pepperpot' affordable with market housing, and for design standards to be the same. Affordable housing should be indistinguishable from market housing. We must avoid the mistakes of the past where sprawling social housing estates were created, separate from market housing and remote from facilities, amenities and services..</p>
Cumbria County Council / Cumbria Strategic Partnership	Option D2	<p>It is considered that a bottom-up approach, utilising the local Cumbria Strategic Housing Market Assessment to derive a local Cumbria rural requirement for affordable housing provision would be a more sound evidence base to implement at a local level.</p> <p>Furthermore, Cumbrian Authorities have agreed with Government Office for the North West to a stretched Local Area Agreement affordable housing target of 260 dwelling units for 2008/2009; 300 dwelling units for 2009/2010; and 350 dwelling units for 2010/2011, which takes account of the identified affordable housing needs arising out of the Cumbria-wide Housing Needs Survey, which was carried out in 2006. The Cumbria-wide Housing Needs Survey identified an annual need for 1,299 affordable units over the five-year period 2006-2011.</p> <p>The top-down approach in Option D1 is not therefore considered appropriate to local circumstances, and may not be sufficiently sensitive to the locally derived evidence base. PPS3 (Housing) advises that it is a requirement for</p>

Organisation:	1. Which of the above options do you agree with?	2. Please explain your answer to the previous question.
		<p>Local Authorities to carry out Strategic Housing Market Assessments (SHMAs) and Strategic Housing Land Availability Assessments (SHLAAs), and it emphasises the importance of this bottom-up approach to defining local housing needs.</p> <p>In these circumstances, it is considered that of the 2 options, it would be better to have a proportional target to allow District Local Authorities in Cumbria to have the discretion to take account of local specific housing needs assessments that may be commissioned as one-off studies, as well as the results of the Cumbria-wide Strategic Housing Market Assessment and the Housing Needs Survey 2006.</p>
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	Option D2	We support Option D2 as we consider that each Housing Market Area has individual characteristics which will warrant individual responses to address affordability issues.
Sefton Metropolitan Borough Council	Option D2	<p>Please explain your answer to the previous question: The initial view is that option D1 would present problems since RSS would be unlikely to have the detailed evidence base, to be established through Strategic Housing Market Assessments, to inform an absolute target and, notwithstanding this, if such targets were set they would be too rigid and may not reflect local circumstances and deliverability. Given this, the option D2 is preferred as it gives more scope for flexibility in the context of what is realistically deliverable in terms of affordable housing.</p>
Crewe and Nantwich Borough Council	Option D1	Since affordable housing need is usually expressed in absolute numbers, it would seem sensible to express the target also in absolute numbers. As in the case with our Housing Needs studies

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

The table below shows the verbatim comments received. We have removed 25 blank responses.

Organisation:	3. What other policy changes are required to RSS to deliver this option and why?
PRS FOR PERSIMMON HOMES (LANCS) LTD AND PRIME RESORTS LTD	Policy L6 on Affordable housing, which will need to reflect targets for each market area
National Housing Federation	See Protecting households, delivering homes – housing associations proposals on the housing market downturn for the Federations initial proposals to Government. We also seek an ongoing dialogue with Government and Regional partners and the Homes and Communities Agency when established, in responding to this rapidly changing situation. It is vital that the RSS links effectively to the regional housing, economic and homeless strategies and the supported housing strategic framework.
Preston City Council	No significant changes identified.
National Trust	No specific comments.
National Housing Federation	See previous responses. It is vital that the RSS links effectively to the Regional Housing Strategy and Single Strategy, Regional homelessness Strategy and Supported Housing Strategic Framework.
Manchester Disabled People's Access Group	Consideration of other options alongside target numbers, including employment, transport, accessibility and adaptability of housing, sustainability of housing, quality of the environment, including support for greening of some neighbourhoods. Making the links between economic, environmental and accessibility policies will contribute to strategies for more sustainable communities.
Haslington Parish Council	Need to ensure protection of rural areas and existing communities.
Charles Topham Group Ltd	Allocation of land in rural areas should include a specific proportion of affordable housing based on local need identified robustly in an assessment. Any % figure should only be included in a document subject to independent examination and should not be brought in in an SPD or as a guidance document as is the current practice by many LPA's in the North West. This allows them to reduce the evidence burden to very little in terms of proving need.
Shelter	RSS will need to take note of priorities expressed in the Regional Homelessness Strategy including increasing access to a choice of settled homes

Organisation:	3. What other policy changes are required to RSS to deliver this option and why?
SATNAM PLANNING SERVICES LTD	Clear strategies to bring forward the required amount of affordable housing with realistic timeframes should be set out.
Lambert Smith Hampton	Revise Policy L6 to include a proportional target for affordable housing provision.
Allerdale Borough Council	Whilst we would have no objection to RSS stating indicative figures for affordable housing need regionally, or even sub-regionally, it would be more helpful if RSS simply contained enabling policies to allow local authorities to pursue affordable housing through RSL development, "quotas" and "exceptional" approvals, where there is robust local evidence of need.
Liverpool City Council	Use of a proportional target in RSS for Liverpool or those districts with complex housing market areas in which regeneration is still required, for example in the HMR Pathfinder.
Pioneer Property Services	None anticipated.
Emerson Group	Assume a target % figure will have to be settled on. With the suggested 35-40% in Section 1 it is difficult to see where this will come from in the future unless massive funding is given to the RSL's. this is given the ever increasing demands on housing developers through climate change initiatives, S106 requirements and obligations and the impending Community Infrastructure Levy which will depress the amount of land coming forward for residential development.
GVA Grimley (on behalf of Goodman)	No comments.
Upper Eden Community Plan Group	The use of agglomerated HMAs at regional level to set affordable housing targets begins to look artificial compared to the rationale behind developing HMAs in the first place. It would be better to set targets for each of the actual HMAs than to combine them for convenience alone.
Pendle Borough Council	Acknowledgement should be made to allow local affordable housing targets in local SHMAs to be used. Consideration also needs to be given to the other requirements imposed on developers such as carbon neutral homes, code for sustainable homes, homes for life, infrastructure etc and the viability of affordable housing provision especially with high land values.
Town and Country Planning Association	Focus on the implementation and monitoring of the affordable housing provision using the proportional targets, fit for purpose to each housing market renewal areas, as a framework.
Cumbria County Council / Cumbria Strategic Partnership	It is envisaged that a proportionate target would not have significant effects upon other parts of the RSS Policies.

Organisation:	3. What other policy changes are required to RSS to deliver this option and why?
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	Policy L6 on Affordable housing, which will need to reflect targets for each market area.

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

The table below shows the verbatim comments received. We have removed 21 blank responses.

Organisation:	4. In taking forward this option, what are the implications for:
<p>PRS FOR PERSIMMON HOMES (LANCS) LTD AND PRIME RESORTS LTD</p>	<p>A) Delivery: It is necessary to provide a balance between affordable housing provision and market housing provision. In particular, the requirement for affordable housing should not be so onerous so as to jeopardise a reasonable rate of return to developers as this would prevent sites from coming forward</p>
	<p>B) Infrastructure provision? No different implications than the NWP</p>
	<p>C) Community and social issues? This will assist in attracting key workers and therefore likely to mean an increase in the provision of key services, such as healthcare.</p>
	<p>D) Environment? This would assist in delivering economic growth, if the correct balance is struck between the requirement for affordable and market housing</p>
	<p>E) Economy? This will assist in the region attracting key workers to the region, which will in turn likely mean the delivery of higher quality services, which in turn attracts highly skilled workers. This will therefore also assist in boosting the economy.</p>
<p>National Housing Federation</p>	<p>A) Delivery: -</p>
	<p>B) Infrastructure provision? -</p>
	<p>C) Community and social issues? Our earlier responses highlight the need for more affordable homes. Poor housing and homelessness are likely to increase if more affordable homes are not built. Poor housing and homelessness have enormous personal impact and social cost, affecting health, educational achievement, and communities. The majority of affordable housing is built by housing associations. Housing associations invest significant resources in the communities in which they work. Not only providing high quality affordable housing – housing associations invest in neighbourhood facilities and a wide range of initiatives to benefit the people and communities with whom they work. Our publication Northern Lights - North West (copy attached) highlights the added value that housing associations offer. For example during the period 2003 - 2008 housing associations in the region have spent £107m contributing to neighbourhood investment and community sustainability including an additional £22m on community safety and a further £3.8m on improving health. Building more affordable homes through Housing Associations will reduce homelessness and poor housing, and will bring added value to our neighbourhoods. Our population is aging. Housing associations new homes will meet “life time home” standards by</p>

Organisation:	4. In taking forward this option, what are the implications for:
	<p>2011, whereas private developers will not. This standard will enable older people to remain in their homes longer, increasing quality of life and making savings in residential care.</p> <p>D) Environment? Housing associations have already been building their homes to high environmental standards – over 90% met the old Eco Homes ‘Very Good’ standard in 2007. From the 1 April 2008, housing associations are required to reduce carbon emissions by 25 % in all new homes. Building to these higher standards can cut carbon emissions and lower the fuel bills of their residents. We are concerned that the Government is not asking private developers to begin cutting emission until 2010. They will then be working to slower timetable towards zero carbon housing than housing associations. The region should look to embed standards for lower carbon emission developments in its regional policies. Building more affordable homes through Housing Associations will reduce carbon emissions.</p> <p>E) Economy? A good quality regional housing offer is a key factor in helping further the economic growth of the region. Housing and the economy go hand in hand. We have already alluded to the impact that limited affordable housing availability can have in terms of the sustainability of rural areas.</p> <p>Our publication <i>Northern Lights - North West</i> highlights the work Housing Associations are doing to create employment and encourage enterprise.</p> <p>For example, in the period 2003 - 2008 they have created 3,550 jobs, found over 860 work experience placements, encouraged 680 people into self employment, delivered 80 projects supporting Government floor targets for encouraging employment and enterprise. They have also in addition to developing their own employees trained 5,300 people (1,500 obtaining formal qualifications) and delivered Projects to help 7000 young people improve their educational attainment.</p> <p>Building more affordable homes through Housing Associations will support economic growth in the North West</p>
Bartonwillmore (<i>on behalf of Paycause ltd</i>)	<p>A) Delivery: As referred to above our client is concerned that delivery could be adversely affected, exacerbating the issue of affordable housing further in the region. A more pragmatic approach would be for a flexible regional policy which could then be applied at the local level, based on local circumstances and specific robust up to date evidence of local need.</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p>

Organisation:	4. In taking forward this option, what are the implications for:
	D) Environment? -
	E) Economy? -
Preston City Council	A) Delivery: There will be local implications that are most likely to be picked up in Core Strategies and other DPDs
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
National Trust	A) Delivery: No specific comments.
	B) Infrastructure provision? No specific comments.
	C) Community and social issues? No specific comments.
	D) Environment? No specific comments.
	E) Economy? No specific comments.
Blackpool Council	A) Delivery: Housing downturn under-provision against the overall housing requirement figure would impact to reduce affordable housing delivery too. Additional provision over the stated "at least" total housing requirement would, however, not necessarily increase the level of affordable housing provision. In some ways there is an argument for a target which is both absolute and proportionate e.g. at least x,000 or X% of total completions, whichever is the higher.
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
National Housing Federation	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? Housing Associations invest significant resources into

Organisation:	4. In taking forward this option, what are the implications for:
	<p>community and social issues. The findings from our Neighbourhood Audit will be available in the autumn and will highlight the neighbourhood projects housing associations have delivered and their outcomes. Our publication Northern Lights - North West highlights the work Housing Associations are doing. For example during the period 2003 - 2008 housing associations have spent £107m contributing to neighbourhood investment and community sustainability including an additional £22m on community safety and a further £3.8m on improving health.</p>
	<p>D) Environment? From 2008 Housing Associations are required to build homes to Code for Sustainable Homes Level 3. This will reduce carbon emissions on these homes by 25%. Private developers do not need to meet this target till 2010. The Federation believe this is unacceptable, and that all new development should meet the Codes standards. An additional benefit of the financial downturn, if associations are able to develop affordable homes over the next two years while private developers reduce their activity, is that the homes built will be to a higher environmental standard and emissions reduced.</p>
	<p>E) Economy? Current indications suggest that private developers are not likely to develop more homes in the current market. It is absolutely essential that building of affordable homes continues during this period, if we are to achieve government targets and meet the need for more homes in the NW Our publication Northern Lights - North West highlights the work Housing Associations are doing to create employment and encourage enterprise. For example, in the period 2003 - 2008 they have created 3,550 jobs, found over 860 work experience placements, encouraged 680 people into self employment, delivered 80 projects supporting Government floor targets for encouraging employment and enterprise. They have also in addition to developing their own employees trained 5,300 people (1,500 obtaining formal qualifications) and delivered projects to help 7000 young people improve their educational attainment</p>
Sustainable Neighbourhoods Pool Manchester	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? Access to affordable and secure housing whether socially rented, privately rented or owner occupied should be a right not privilege. It looks likely that with rising oil and food prices more of the family/individual income will have to be spent heating homes and feeding people, causing an increased hardship on paying mortgages and rents.
	D) Environment? -
	E) Economy? -

Organisation:	4. In taking forward this option, what are the implications for:
Manchester Disabled People's Access Group	A) Delivery: Need for more involvement with the VCS Better design standards More commitment from planning authorities to more accessible and sustainable standards for housing and community facilities
	B) Infrastructure provision? Better compliance to best practice accessibility standards for housing but also for public buildings, for employment facilities and provision and for public services Better guidance for developers, housing providers including the private and social housing sectors, planners, and potential residents and tenants Support for innovative pilot projects
	C) Community and social issues? Greater involvement with the Voluntary and Community Sector and with disabled people's organisations Support for innovative financial products to reduce homelessness and increase choice for tenants and residents
	D) Environment? New and refurbished properties to incorporate accessibility, adaptability, sustainability and energy conservation
	E) Economy? Affordable housing strategies need to be linked to employment and transport developments, evidence and projections. Currently there is anecdotal evidence that disabled people are not able to access some employment opportunities because of a lack of accessible housing and there is very little availability within the private housing sector, particularly new developments
Haslington Parish Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? Danger of distorting existing communities by adding new building to communities - need for Social Landlords to purchase appropriate existing housing stock to increase local provision.
	D) Environment? -
	E) Economy? 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.
Charles Topham Group Ltd	A) Delivery: Market housing is important in rural areas and the needs to be allocations for both by LPA's

Organisation:	4. In taking forward this option, what are the implications for:
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Shelter	<p>A) Delivery: Research - Shelter has commissioned Kelvin MacDonald to produce an internal report into the barriers to affordable housing delivery and some solutions to these (Barriers and solutions to local delivery of affordable homes (internal report for Shelter), Kelvin MacDonald, 2008 Report - Study of housing need (this is a working title): Shelter has commissioned the Cambridge Centre for Housing and Planning Research to undertake research to enable Shelter to estimate how many of the three million new homes by 2020 should be social rented, and update our estimates of the backlog of unmet need for social rented housing. This report will be published in November 2008</p> <p>B) Infrastructure provision? New housing developments must be easily accessible to transport links (especially public transport) and have adequate provision of amenities including open spaces, schools, shops, GPs surgeries, community centres.</p> <p>C) Community and social issues? It is vital that we avoid the mistakes of past house-building programmes and create sustainable mixed communities where people want to live now and in the future. To build the right housing and create quality places, it is essential that local communities are fully involved. Communities have the local knowledge and understanding to make a real contribution to guide the development of housing that meets local needs and aspirations and is acceptable to local people. Report - Building new communities in growth areas: evidence from the Thames Gateway: this research examines what good communities and neighbourhoods mean to people living in growth and regeneration areas. It has been contracted to the London East Research Institute (LERI) at the University of London (this research is pending for the end of July 2008) Report: Breaking Point: How unaffordable housing is pushing us to the limit (Shelter 2008): this report explores the affect Britain's chronic shortage of affordable homes to buy and rent is having on ordinary people. A key finding is that six million people are suffering stress or depression due to high housing costs.</p> <p>D) Environment? Shelter strongly supports the Government's target that over 60 per cent of homes should be built on brownfield sites. It is important that where land is available in urban areas, this is used for housing development rather than green sites. This is particularly true of</p>

Organisation:	4. In taking forward this option, what are the implications for:
	<p>social housing development: we would not want to see social housing development pushed to the outskirts of towns and cities when much of the need for this type of accommodation is in central locations. People who are in need of social housing may be less likely to have access to a car and therefore more likely to benefit from living in a central location where services can be more easily accessed. We understand however that in order to accommodate growth it may be necessary to significantly expand some existing settlements. We are also aware that it may not always be appropriate to use brownfield sites in urban areas for new housing as some of these sites may in fact be green, open space valued by the local community as a recreation area and a haven for wildlife.</p> <p>E) Economy? Having enough affordable housing is key to achieving a successful regional economy that benefits all residents. A recent Treasury review estimated that if the housing market had worked better since 1994, Gross Domestic Product could be up to 16 billion pounds higher, with an additional 650,000 jobs (Barker, K. Review of Housing Supply: Interim Report, HM Treasury, December 2003) Social rented housing provides a route out of the poverty trap; high rents are one of the key barriers to looking for and being better off in work (DWP (2007) Evaluation of the Working neighbourhoods pilot, Final report, DWPRR 411. Cooke G and Lawton K (2007) Working Poverty - a study of the low paid and the 'working poor', IPPR, November.</p>
RPS Planning	<p>A) Delivery: An unrealistically high target for affordable housing will impact on the delivery of private housing if economic viability is affected.</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? -</p> <p>E) Economy? -</p>
SATNAM PLANNING SERVICES LTD	<p>A) Delivery: LPA's must have clear strategies in place to provide delivery.</p> <p>B) Infrastructure provision? This should be planned hand in hand with provision, by means of market housing released if required to provide financial support.</p> <p>C) Community and social issues? These should be addressed through clear strategies for provision and delivery.</p> <p>D) Environment? This will need to be addressed and balanced with the need to provide these homes to those in housing need.</p>

Organisation:	4. In taking forward this option, what are the implications for:
	E) Economy? Proper provision in the main urban centres and rural settlements will assist in providing a well balanced and accessible housing market to support economic growth.
Carlisle City Council	A) Delivery: This would have to be through the LDF process and would need further evidence at the local level to determine locations aspects and other issues such as threshold levels. By virtue of the level of need this will vary throughout the north west.
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Lambert Smith Hampton	A) Delivery: Unable to fully comment on affordable housing targets being met until the figures have been tested and the Housing Land Availability Assessments have been carried out throughout the region.
	B) Infrastructure provision? If the affordable housing provision is set too high the amount of infrastructure provided may be more limited.
	C) Community and social issues? The opportunity to provide more affordable housing may be increased.
	D) Environment? Limited impact on the environment but a more varied community would be provided.
	E) Economy? If successful investment would be encouraged into the area.
Allerdale Borough Council	A) Delivery: Not clear at this stage. However, we would observe that we consider the existing mechanisms for the delivery of affordable housing to be totally inadequate across the board.
	B) Infrastructure provision? Not clear at this stage
	C) Community and social issues? As above
	D) Environment? As above
	E) Economy? As above
Liverpool City Council	A) Delivery: There is emerging evidence in the Liverpool City Region Housing Strategy 2008

Organisation:	4. In taking forward this option, what are the implications for:
	<p>Monitoring Report to suggest that Liverpool is delivering a significant amount of affordable housing without an affordable housing policy. This is via a range of bespoke products tailored to meet local need. It is important that this flexibility is retained to reflect changing situations.</p> <p>B) Infrastructure provision? No Comment</p> <p>C) Community and social issues? No Comment</p> <p>D) Environment? No Comment</p> <p>E) Economy? No Comment</p>
Pioneer Property Services	<p>A) Delivery: Absolute target likely to be more deliverable than proportional target. Individual LPA policies will need to have regard to issues of viability and potential constraint on supply of all new housing.</p> <p>B) Infrastructure provision? Affordable Housing provision needs to be considered in the context of emerging Community Infrastructure Levy and other developer obligations as to impact on viability of development.</p> <p>C) Community and social issues? Affordable Housing provision should be focussed on households with the most pressing needs, and supported by ongoing public investment programmes, allowing market development to address underlying affordability issues through delivery of the appropriate mix, size and type of new housing in suitable locations.</p> <p>D) Environment? None anticipated.</p> <p>E) Economy? Policies should be tested to ensure they do not constrain delivery of new housing with attendant impacts on construction employment and contribution to regional economy.</p>
Emerson Group	<p>A) Delivery: Probably will not be met at the % proposed for the reasons in 3 above.</p> <p>B) Infrastructure provision? Similar to market housing.</p> <p>C) Community and social issues? Similar to market housing</p> <p>D) Environment? Similar to market housing</p> <p>E) Economy? Similar to market housing</p>
Upper Eden	<p>A) Delivery: -</p>

Organisation:	4. In taking forward this option, what are the implications for:
Community Plan Group	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Pendle Borough Council	A) Delivery: Viability is a key consideration in the delivery of affordable housing. Affordable housing will often only be able to be delivered with a certain level of market housing to support the development. Setting the right level of affordable housing that is required will also be key to its delivery. If the requirement is too high then it is unlikely developers will be able to deliver it.
	B) Infrastructure provision? Developers are increasingly required to provide additional benefits to the community with new developments. The provision of affordable housing may impact on the level of infrastructure that can be provided.
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Town and Country Planning Association	A) Delivery: Co-ordination with the regional infrastructure fund to ensure timely delivery of infrastructure to meet the phasing of development or continue with infrastructure delivery regardless of levels of housebuilding to ensure when the outlook is more positive, the infrastructure would be in place to facilitate immediate development.
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
CPRE North West	A) Delivery: This should strengthen local authorities hand in Section 106 negotiations and therefore increase the delivery of affordable housing across the region.
	B) Infrastructure provision? -
	C) Community and social issues? This option should drive the provision and integration of

Organisation:	4. In taking forward this option, what are the implications for:
	affordable housing and therefore improve the balance of communities and the housing options for all communities.
	D) Environment? Affordable housing provision should be used to drive higher environmental standards.
	E) Economy? This will provide much-needed housing for lower-income workers that are vital to support a thriving economy. Not everyone can work in the “high-value, knowledge-based economy”, and our planning and economic strategies need to reflect and embrace this fact.
Cumbria County Council / Cumbria Strategic Partnership	A) Delivery: It would help define local LDF Policies. However, it should not dictate levels of affordable housing as that should be derived by a local evidenced base, such as local specific housing needs assessments that may be commissioned as one-off studies, as well as the results of the Cumbria Strategic Housing Market Assessment.
	B) Infrastructure provision? It would assist in giving very broad guidance to setting out local infrastructure provision as part of the overall housing requirement.
	C) Community and social issues? It would assist in giving very broad guidance to setting out local community and social issues as part of the overall housing requirement.
	D) Environment? As above.
	E) Economy? It would assist in setting out the context of housing delivery in relation to future employment provision. It is likely that any increase in the provision of affordable housing would support the development of the economy, especially in rural areas.
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	A) Delivery: It is necessary to provide a balance between affordable housing provision and market housing provision. In particular, the requirement for affordable housing should not be so onerous so as to jeopardise a reasonable rate of return to developers as this would prevent sites from coming forward.
	B) Infrastructure provision? No different implications than the NWP
	C) Community and social issues? This will assist in attracting key workers and therefore likely to mean an increase in the provision of key services, such as healthcare.
	D) Environment? This would assist in delivering economic growth, if the correct balance is struck between the requirement for affordable and market housing.

Organisation:	4. In taking forward this option, what are the implications for:
	E) Economy? This will assist in the region attracting key workers to the region, which will in turn likely mean the delivery of higher quality services, which in turn attracts highly skilled workers. This will therefore also assist in boosting the economy.