



PARTIAL REVIEW OF REGIONAL
SPATIAL STRATEGY (RSS) –

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

CONSULTATION REPORT

North West Regional Assembly

PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing E

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.

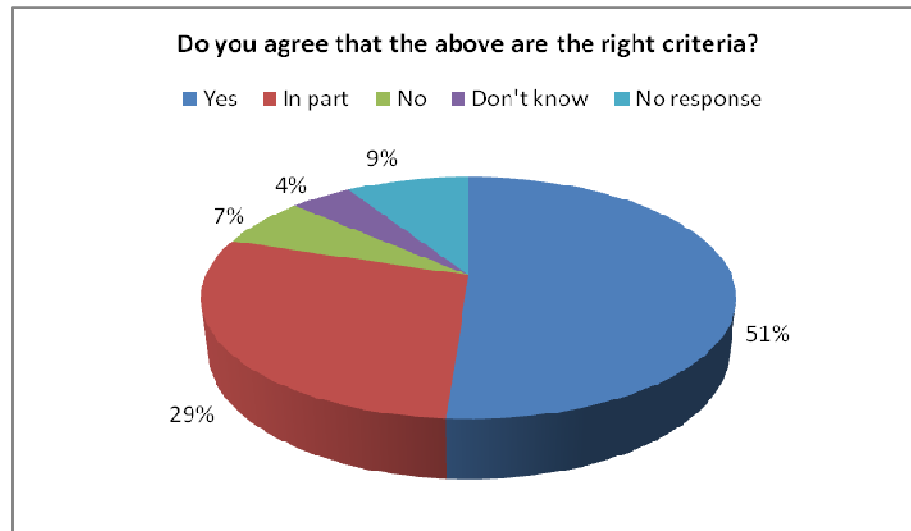
Section One lists the responses revised. These responses were received through the online questionnaire, the paper questionnaire, the free phone line and by letter.

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. Do you agree that the above are the right criteria?

Do you agree that the above are the right criteria?	
Yes	24
In part	14
No	4
Don't know	2
No response	4
Total Responses	47



The table below shows the verbatim comments received. We have removed 1 blank responses.

Organisation:	1. Do you agree that the above are the right criteria?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
PRS FOR PERSIMMON HOMES (LANCS) LTD AND PRIME RESORTS LTD	In part	Whilst we support the criteria in this section, we also think that an additional criterion relating to areas of significant affordability issues (e.g. the southern part of Greater Preston) as by increasing housing in these areas, it will assist in tackling chronic affordability issues in these problem areas.		
Macclefield BC	Yes	Although there is only one option proposed, Macclefield BC considers that the criteria suggested in the approach detailed seem entirely appropriate.		
Northwest Regional Development Agency	Yes	Option E refers to a number of broad locations for housing development which includes any short listed growth points; the Agency welcomes this approach and is equally supportive of the housing growth agenda.		

Organisation:	1. Do you agree that the above are the right criteria?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Indigo Planning Limited	In part	CEG broadly accept the criteria and broad locations set out, but also emphasise the need for recognition of housing delivery to focus on the successful towns/cities in the region as well as those in need of regeneration. The region needs to build on its successes and also seek to deliver housing in a sustainable way so as to reduce the need to travel. Vibrant and successful cities like Chester should be a focus for new housing as it will help to stimulate and drive the local, regional, sub regional and national economy and enable synergy between housing and employment areas		
National Housing Federation		<p>The North West has 4 Housing Market Renewal areas. The vital regeneration work in these areas continues. It is absolutely essential that the ongoing work of the Housing Market Renewal Pathfinder areas is balanced with any new areas of housing growth in the region. Sufficient resources must be allocated to continue with the longer term work of these regeneration initiatives.</p> <p>It is also of note that the North West has 8,420 hectares of previously developed vacant and derelict land, almost a quarter of the total for England. This provides an indication of the need for regeneration and development activity in the region.</p>		
Campaign to Protect Rural England Chester District		<p>The Panel Report made very strong recommendations against economic growth and increased housing figures for Chester. The Panel was very clear that focussing significant new growth on Chester was not appropriate or sustainable. See enclosure Panel Report Paras 4.101, and 5.36 - 5.39 as follows: 4.101 A case was also put to us for a new tier of settlements, below the Regional Centres, to include Preston, Chester and Carlisle. We were not convinced by this either. These are important centres. Each serves a particular and important function in its own way. But we see them as part of a continuum. While, as we have said (and the draft RSS proposes) Manchester and Liverpool are clearly in a league of their own, we do not think that these 3 stand so far out from the crowd as to justify the additional sophistication proposed.</p>		
Bartonwillmore on behalf of Paycause Ltd	No	<p>Paycause supports the criteria above, but additional criteria such as land supply within particular settlements may also require the need for broad locations for growth, such as Chester within the "West Cheshire" area in order to deliver its projected housing requirements in the emerging plan period. Therefore it is recommended that this criteria is also added.</p>		

Organisation:	1. Do you agree that the above are the right criteria?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Indigo Planning Limited	Yes	CEG broadly accept the criteria and broad locations set out, but also emphasise the need for recognition of housing delivery to focus on the successful towns/cities in the region as well as those in need of regeneration. The region needs to build on its successes and also seek to deliver housing in a sustainable way so as to reduce the need to travel. Vibrant and successful cities like Chester should be a focus for new housing as it will help to stimulate and drive the local, regional, sub regional and national economy and enable synergy between housing and employment areas.		
Countryside Properties	Yes	As the suggested broad locations reflect the wider priorities of the sub-region and would continue to prioritise housing market renewal, these identified priorities are acceptable. However, deliverability should be at the forefront, which given the current and probably medium term market potential places a strong emphasis on plan monitor and manage.		
GONW		It is not clear what the purpose of this section is given that the Growth Points are already being assessed separately and that the spatial development framework is taken as a given. The broad locations and growth points are generally those set out in the spatial framework, however it is not clear what the priorities will be once the growth points are selected. It needs to be clear that the broad locations will still include all these areas regardless of their selection as they are the priorities of the spatial framework. Given the spatial redistribution into rural areas it may also be useful to outline the priorities for development in rural areas. It is not clear until underpinning evidence is available where the spatial distribution set out in the options may lead to conflicts with the 3rd criteria in relation to infrastructure and environmental implications.		
Halton Borough Council	Yes			
Preston City Council	Yes	These are consistent with the overall vision for the region.		
National Trust	Yes	Generally the most sustainable approach and accords with emerging RSS Policies. However, it is unclear at present how the environmental implications will be assessed and this is a key area that needs to be addressed; at present the ECOSEG work appears to be concentrating on infrastructure limitations rather than making any assessment of		

Organisation:	1. Do you agree that the above are the right criteria?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		potential impacts upon landscapes and natural/built environment assets and their ability to absorb development without demonstrable harm.		
Blackpool Council	Yes	Yes – fully supported. This is in line with the basic spatial priorities of NWRSS and reflects a sustainable focus of planned growth on the major urban centres, where existing population and supporting infrastructure is concentrated, and where regeneration needs are highest.		
Lancashire County Council	No	The key criteria are: the priorities in the Spatial Development Framework, the spatial development principles and critical infrastructure and environmental implications. the sub regional policies contained in the current review of RSS will be shaped by whether a Growth Point Expression of Interest proceeds.		
Cheshire West and Chester (comments represent informal officer views)	In part	We have no major objections to Partial Review having a specific growth point and eco-town policy. We do question whether a policy is actually needed. The current bids have happened without a specific policy in RSS. It is unclear how much will be achieved by having specific policy. RSS should acknowledge successful New Growth Point areas and give priority to those areas for infrastructure investment.		
Haslington Parish Council	In part	ECo towns are likely to be a passing political fad.		
Merseyside Policy Unit	Yes	These criteria reflect the spatial priorities of RSS which Merseyside has already endorsed.		
Copeland Borough Council	In part	We support this option because in principle it will help deliver the West Cumbria Masterplan - an essential part of achieving regeneration of the area in accordance with Policy CNL2. Housing is a key driver for regeneration and there should be no unnecessary restriction on the sub-region's supply of new, higher quality housing. Consideration should also be given to local Strategic Housing Market Assessments and local Sub-Regional Housing Strategies, as well as local Economic Strategies to better inform the distribution of new development, and to make the direct link between housing and employment provision.		
Shelter	Yes	Shelter is supportive of the expansion of the Growth Points Programme into the North West of England, in recognition of the fact that many localities in the North West have		

Organisation:	1. Do you agree that the above are the right criteria?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		become areas of high housing demand. As such we are pleased that bids from the North West have been put forward. It is vital that any new Growth Points that are introduced into the region contain high levels of social housing		
Satnam Planning Services Ltd	Yes	The growth areas are well placed to receive strategic growth to fuel the well being of the region and to assist the more needy parts of the region to improve and prosper; especially Warrington and Chester.		
Carlisle City Council	In part	As Carlisle have submitted a growth point bid clearly the identification of broad locations would be welcomed. There are however concerns that as the results of the bids are not known there is no indication of how this fits into a broad locations strategy. If bids are not successful there is no indication how the first bullet is to be expressed or how economic aspirations are to be delivered through the RSS in connection to housing delivery.		
Allerdale Borough Council	In part	The criteria listed are appropriate but not complete. They should be broadened to include consistency with Housing Market Assessments, Housing Strategies, local economic strategies and other local strategies, eg, Sustainable Communities Strategies, and for transport, etc. In this way development can be better related to need, to infrastructure and to social and economic policy.		
Lambert Smith Hampton	Yes	We support the criteria for setting out the broad locations for growth points on the assumption that the criteria is based on up-to-date national guidance and policies. As such, the criteria would then be in line with current Government objectives.		
Liverpool City Council	Yes	It is important that locations for growth are tested via the planning system in order to achieve sustainable development, achieve sustainable economic growth and support regeneration. The principles proposed are those set down in emerging RSS and so are supported		
West Lancashire District Council	Yes	Broadly agree with the criteria as set out, but the District Council does not have strong views on this matter. Skelmersdale should be treated as an urban area in the Liverpool City Region that requires regeneration.		
Highways Agency	In part	Reference to critical infrastructure is supported but needs to be defined. The capacity of the critical infrastructure needs to be a determining factor. The criteria need to support		

Organisation:	1. Do you agree that the above are the right criteria?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		spatial alignment between housing and economic locations (opportunities and need).		
Emerson Group	In part	A broad brush approach will not serve to resolve local issues. Eco towns are not proposed nor should be. Urban extensions are a more logical and sustainable way of approaching sites for major development.		
LDNPA	Don't know	I have no understanding of the housing requirements for the areas identified.		
GVA Grimley (on behalf of Goodman)	Yes	The criteria takes account of formal policy documents and wider practical considerations and therefore are well balanced.		
Wirral MBC	Yes	The suggested criteria reflect the wider priorities of the sub-region and would continue to prioritise HMRI		
Pendle Borough Council	No	The criteria should also include potential impacts on the HMR areas. For example East Lancashire has a number of HMR projects underway. If growth points are going to be established in the Central Lancashire City Region around Preston, Chorley and South Ribble what affect will this have on the HMR areas in East Lancashire? Increased housing provision in the growth point areas may attract people away from the East Lancashire area exacerbating the problems in the HMR areas.		
Chorley Council	Yes	Support this criteria as would include the Central Lancs/Blackpool growth point as a broad location for housing development.		
AGMA (the Association of Greater Manchester Authorities)	In part	AGMA's view is that to put forward options around criteria and broad locations in this way is potentially very confusing. The location of growth points in the region should clearly reflect the priorities of the Spatial Development Framework and the Spatial Development Principles set out in RSS. This is the basis on which AGMA has submitted its Growth Point proposal for Greater Manchester.		
English Heritage	Yes	The detail which must accompany and explain "critical infrastructure and environmental implications" must cover the historic environment. It should also address both positive and negative implications/effects.		
Cheshire East Council	Yes			
Chester City Council	Yes	If one or many growth point bids are successful, identifying these broad locations		

Organisation:	1. Do you agree that the above are the right criteria?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		within RSS (Option E) would be the Council's preferred option, as it would give the necessary policy support and recognition to the local authorities charged with delivering the increased levels of housing growth.		
CPRE North West	In part	These criteria reflect the principles and framework agreed through the RSS consultation and EiP process. They represent a genuinely sustainable framework for considering locations for future housing growth. NB it should be clarified that the Spatial Development Framework recommended by the EiP Panel Report differs substantially to that in the Secretary of State's proposed changes. The statement above refers to the Panel Report Spatial Development Framework, not the Framework in the proposed changes, which has not been subject to an adequate sustainability appraisal, or been consulted upon, tested or examined in any way prior to its appearance in the proposed changes. We are aware of widespread objection to the Framework in the Proposed Changes and trust that the Secretary of State will revert to the tested, agreed Framework rather than the untested proposal which has no evidence base to support it.		
Town and Country Planning Association	Yes	The TCPA supports the development principles of the North West RSS as in our submission to the proposed changes with minor amendments. In addition the TCPA considers the PPS on eco-towns due to be published for consultation in July to be included as material planning policy consideration for eco-towns and new settlement development. Please also refer to the TCPA preferred option to housing provision within the revised spatial distribution (Option A2.2). The criteria, as set out, can be considered into different categories of regionally and sub-regionally significant development criteria, broad locational criteria, and development criteria meeting high standards of sustainability.		
Forestry Commission	In part	The opportunities for Green Infrastructure need to be used as part of the criteria for Broad locations. GI planning from the beginning can maximise the economic, social and environmental outcomes from housing growth. Developers need to consider GI as an integral part of development, as a way to maximise marketability. A Community Infrastructure levy could provide for sustainable management of new (and improvement of existing) greenspaces		
Cumbria County	No	It is considered that there should be separate criteria for eco-towns and		

Organisation:	1. Do you agree that the above are the right criteria?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Council / Cumbria Strategic Partnership		<p>growth points because each one has a different purpose. Hence it would not necessarily be appropriate to have the same priorities in the Spatial Development Framework for their location. An eco-town could be considered appropriate in a location some distance away from an existing urban/built up area, for example Derwent Forest in West Cumbria.</p> <p>It is considered that in setting the broad locations for new development, consideration should also be given to local Strategic Housing Market Assessments and local Sub-Regional Housing Strategies, as well as local Economic Strategies to better inform the distribution of new development, and to make the direct link between housing and employment provision. Furthermore, it is likely that other local policy documents, such as highways and transport policy should be used to inform the location of new development to ensure that existing infrastructure can accommodate proposed housing growth.</p> <p>In this way, the location of new housing can be better related to identified housing needs (i.e. affordable, intermediary and unrestricted open market housing), whereby local planning, housing and economic policy can be used to suit local circumstances.</p>		
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	In part	<p>Whilst we support the criteria in this section, we also think that an additional criterion relating to areas of significant affordability issues (e.g. the southern part of Greater Preston) as by increasing housing in these areas, it will assist in tackling chronic affordability issues in these problem areas.</p>		
Crewe and Nantwich Borough Council	Yes	<p>The criteria suggested in this approach seem entirely appropriate.</p>		

2. Based on the above criteria, do you agree that the following broad locations are appropriate?

The table below shows the verbatim comments received. We have removed 4 blank responses.

Organisation:	2. Based on the above criteria, do you agree that the following broad locations are appropriate?	2a. If so why?	2b. If not, why not?	2c. Please explain your answer to the previous question.
PRS FOR PERSIMMON HOMES (LANCS) LTD AND PRIME RESORTS LTD	Yes	Generally the most sustainable approach and accords with emerging RSS Policies.		
Indigo Planning Limited	In part	In the first bullet point, recognition of the Central Lancashire, Blackpool bid is supported. The regeneration initiatives for the Housing Market Renewal Initiative Pathfinder Areas (2nd bullet point) and the Lancashire Coastal Towns of Blackpool/Fleetwood and Morecambe (3rd bullet point) are supported.		
Campaign to Protect Rural England Chester District	In part	These appear to all be areas that could potentially support growth points and eco-towns.		
Bartonwillmore on behalf of Paycause Ltd	No	Need more detailed local consultation with local communities.		
Indigo Planning Limited	Yes	Again, these can be supported as they reflect earlier priorities which we have already supported – most recently in responding to the Proposed Changes to RSS in May.		
Countryside Properties	Yes	We support this option because in principle it will help deliver the West Cumbria Masterplan - an essential part of achieving regeneration of the area in accordance with Policy CNL2. Housing is a key driver for regeneration and there should be no unnecessary restriction on the sub-region's supply of new, higher quality housing. Consideration should also be given to local Strategic Housing Market Assessments and local Sub-Regional Housing Strategies, as well as local Economic Strategies to better inform the distribution of new development, and to make the direct link between housing and employment provision.		

Organisation:	2. Based on the above criteria, do you agree that the following broad locations are appropriate?	2a. If so why?	2b. If not, why not?	2c. Please explain your answer to the previous question.
GONW	Yes			
Halton Borough Council	Yes	Warrington has the capacity for substantial growth to the north of the town, within environmental limits, in an area which needs and will benefit from significant investment. Chester, likewise to the west, has similar areas.		
Preston City Council	Yes	Carlisle seeks to strengthen its role as a sub-regional centre with aspirations for economic growth. In order to deliver this growth there will also be a need to deliver more housing. This would be assisted as Carlisle is recognised as a broad location for growth.		
National Trust	In part	The broad locations are appropriate but not complete. If the broad locations are to inform the overall spatial distribution they should make reference to other KSCs, to LSCs and perhaps to Regeneration Priority Areas. Referring to RPAs would necessitate redefining "West Cumbria and Furness". Furthermore, the broad locations should reflect the priorities intended in the regional settlement hierarchy, otherwise they may be seen as potentially undermining the sustainable principles behind the overall spatial framework.		
Blackpool Council	In part	We support the broad locations as being appropriate in part. We do not support the last broad location which relates to other urban areas in Manchester and Liverpool City regions in need of housing regeneration/market restructuring. There is no justification to limit broad locations to other urban areas in Manchester and Liverpool only. It should already be known which urban areas of Manchester and Liverpool regions require support as they have been previously identified as appropriate for a bid for being a growth point or a housing market renewal pathfinder area. We would therefore suggest the deletion of reference to just Manchester and Liverpool City regions. Therefore the last bullet point should read 'other urban areas in need of housing regeneration/market restructuring'.		
Lancashire County Council	Yes	Need to follow the spatial hierarchy as set out within the RSS.		

Organisation:	2. Based on the above criteria, do you agree that the following broad locations are appropriate?	2a. If so why?	2b. If not, why not?	2c. Please explain your answer to the previous question.
Sustainable Neighbourhoods Pool Manchester	In part	The broad locations need to be well-related to locations for economic development.		
Cheshire West and Chester (comments represent informal officer views)	In part	The distribution is important and should not result in adverse impact on Liverpool and Manchester City Regions.		
Haslington Parish Council	Don't know	I have no understanding of the housing requirements for the areas identified.		
Merseyside Policy Unit	Yes	The focus remains on key urban areas within the region which will be most suitable for further development in terms of infrastructure provision and other resources. Some caution will need to be exercised to ensure that identified growth points do not mean that existing urban areas are abandoned in terms of regeneration and development.		
Copeland Borough Council	Yes	The suggested locations reflect the wider priorities of the sub-region and would continue to prioritise HMRI		
Shelter	In part	Identifying the HMR areas as a broad location for housing growth may risk harming the initiatives to restructure and remodel these areas. An oversupply of obsolete housing in these areas could be aggravated by an increase in new housing.		
Satnam Planning Services Ltd	Yes			
Carlisle City Council	In part	AGMA's view is that to put forward options around criteria and broad locations in this way is potentially very confusing. The location of growth points in the region should clearly reflect the priorities of the Spatial Development Framework and the Spatial Development Principles set out in RSS. This is the basis on which AGMA has submitted its Growth Point proposal for Greater Manchester.		
Allerdale Borough	In part	West Cheshire includes Chester, the RSS Panel concluded that opportunities for growth		

Organisation:	2. Based on the above criteria, do you agree that the following broad locations are appropriate?	2a. If so why?	2b. If not, why not?	2c. Please explain your answer to the previous question.
Council		in Chester were limited noting the role of the Green Belt in protecting its setting and its important historic environment. The implications for Chester as part of West Cheshire require clarification and further detailed assessment. Development of a growth point at Liverpool /Wirral will have significant implications for the Liverpool World Heritage Site. The CABE English Heritage Urban Panel made a second visit to Liverpool and Wirral on the 23rd June 2008 to review strategic issues relating to the development proposals for this area. Further information will be forwarded when this is available.		
Lambert Smith Hampton	Yes			
Liverpool City Council	Yes	It is important that locations for growth are tested via the planning system in order to achieve sustainable development, achieve sustainable economic growth and support regeneration. The principles proposed are those set down in emerging RSS and so are supported		
West Lancashire District Council	In part	The broad locations are appropriate to the extent that they comply with the details of the criteria. It is not at all clear that Carlisle or West Cheshire, or to a lesser extent Central Lancashire / Blackpool, do indeed comply with these criteria. This is particularly the case if the Spatial Framework is taken to be the one recommended by the EiP Panel after rigorous testing, as opposed to the rather arbitrary, untested one that directly contradicts those recommendations put forward by the Secretary of State. It should be noted in particular that the Panel Report made very strong recommendations against any major development in Chester, including housing development (eg paragraphs 2.31(iv), 4.65, 5.4, 5.36-5.39, 6.75 12.17; para 6.75 specifically warns against any greater level of housing development than that recommended in the Panel Report). It is not at all clear that Morecambe would comply with the criteria in terms of a location for significant housing growth. While it does require regeneration and some new housing will play a part in that, it is not a location where housing-led regeneration is likely to be successful and it already exhibits low demand.		
Highways Agency	Don't know	The TCPA makes no support or opposition to broad locations for growth but only to support our comments with respect to a revised spatial distribution to ensure growth is		

Organisation:	2. Based on the above criteria, do you agree that the following broad locations are appropriate?	2a. If so why?	2b. If not, why not?	2c. Please explain your answer to the previous question.
		accommodated where it is needed and/ or potentially needed.		
Emerson Group	In part	Until exact locations for Growth Points are known it is hard to say what opportunities and challenges will be.		
LDNPA	Yes	Generally the most sustainable approach and accords with emerging RSS Policies.		
GVA Grimley (on behalf of Goodman)		Yes – fully supported. This is in line with the basic spatial priorities of NWRSS and reflects a sustainable focus of planned growth on the major urban centres, where existing population and supporting infrastructure is concentrated, and where regeneration needs are highest.		
Pendle Borough Council	In part	In the first bullet point, recognition of the Central Lancashire, Blackpool bid is supported. The regeneration initiatives for the Housing Market Renewal Initiative Pathfinder Areas (2nd bullet point) and the Lancashire Coastal Towns of Blackpool/Fleetwood and Morecambe (3rd bullet point) are supported.		
AGMA (the Association of Greater Manchester Authorities)	In part	These appear to all be areas that could potentially support growth points and eco-towns.		
English Heritage	No	Need more detailed local consultation with local communities.		
Cheshire East Council	Yes	Again, these can be supported as they reflect earlier priorities which we have already supported – most recently in responding to the Proposed Changes to RSS in May.		
Chester City Council	Yes	We support this option because in principle it will help deliver the West Cumbria Masterplan - an essential part of achieving regeneration of the area in accordance with Policy CNL2. Housing is a key driver for regeneration and there should be no unnecessary restriction on the sub-region's supply of new, higher quality housing. Consideration should also be given to local Strategic Housing Market Assessments and local Sub-Regional Housing Strategies, as well as local Economic Strategies to better inform the distribution of new development, and to make the direct link between housing and employment provision.		

Organisation:	2. Based on the above criteria, do you agree that the following broad locations are appropriate?	2a. If so why?	2b. If not, why not?	2c. Please explain your answer to the previous question.
CPRE North West	Yes			
Town and Country Planning Association	Yes	Warrington has the capacity for substantial growth to the north of the town, within environmental limits, in an area which needs and will benefit from significant investment. Chester, likewise to the west, has similar areas.		
Forestry Commission	Yes	Carlisle seeks to strengthen its role as a sub-regional centre with aspirations for economic growth. In order to deliver this growth there will also be a need to deliver more housing. This would be assisted as Carlisle is recognised as a broad location for growth.		
Cumbria County Council / Cumbria Strategic Partnership	Yes	<p>The reference made to Carlisle, West Cumbria (i.e. we assume Workington, Whitehaven and Maryport) and Furness, where major development appropriate to the size and role of these regional towns and cities is expected to take place, is considered appropriate for Broad Locations of growth points and eco-towns.</p> <p>However, there is no reference in the Broad locations to other parts of Cumbria, where new development should be directed alongside growth points and eco-towns.</p> <p>In this regard, we consider there is a specific need to direct new housing to other large Key Service Centre towns in Cumbria, such as Ulverston, Kendal and Penrith, where sustained development is required. There is also no mention of other Key Service Centres where a moderate level of development is required appropriate to the scale of the town, such as Brampton, Longtown, Wigton, Aspatria, Cleator Moor, Cockermouth, Dalton-in-Furness, Egremont, Silloth, Millom, Alston, Appleby, Grange-over-Sands, Kirkby Lonsdale, Kirkby Stephen and Milnthorpe (see Cumbria and Lake District Joint Structure Plan).</p> <p>There is no mention of the remaining rural parts of Cumbria where new development is required to meet identified local needs within the Local Service Centres, and there is no mention finally to elsewhere in rural</p>		

Organisation:	2. Based on the above criteria, do you agree that the following broad locations are appropriate?	2a. If so why?	2b. If not, why not?	2c. Please explain your answer to the previous question.
		<p>settlements, where exception housing may be required to satisfy identified affordable housing needs.</p> <p>Confusingly, the Broad Locations do not give any development emphasis or spatial priority, and does not compare favourably to the Proposed Changes to RSS Policies RDF1 and RDF2. It is not clear as to whether or not this omission was intentional.</p> <p>If these should be considered to be spatial priorities for the North West, then there should be mention of other areas as set out in Proposed Changes to RSS Policy RDF2, which is especially important for a rural county, such as Cumbria.</p>		
<p><i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.</p>	<p>Yes</p>	<p>Whilst Central Lancashire is included for Growth Point bid reasons, we also think it should be included for affordability reasons.</p>		

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	Policies DP1, L4, which relate to locations for development. Key broad locations should be located within these key policies of the NWP.
Northwest Regional Development Agency	We note that the options paper (Section 2.2) refers to the fact that the total level of housing provision will include growth proposed as part of any short listed growth point proposals. This would seem contrary to the requirements of the Housing Green Paper, where Local Authorities submitting Expressions of Interest to become housing growth points were asked to demonstrate a level of housing growth (20%) in addition to and above that of existing draft RSS. Should levels of housing provision, as set out in RSS continue to be interpreted as maximum targets to be achieved over the plan period then this would have the effect of placing a restrictive framework upon any successful growth points. This would seem to be a somewhat contradictory approach and contrary to the letter from Baroness Andrews to Lord Greaves, copied to all North West Local Authority Chief Executives, which confirmed that RSS housing targets should not be viewed as caps or ceilings. Whilst acknowledging the principles of the plan, monitor and manage approach, it is important that the provision of housing supply is sufficiently flexible to accommodate demand, specifically in the context of supporting the region's economic growth aspirations.
Campaign to Protect Rural England Chester District	6.73 Peel Holdings told us of the potential of redundant dockland in Birkenhead to accommodate a substantial amount of new housing. In view of this, they considered that the proposed housing provision for the Wirral should be increased to 600 a year. We understand that the potential of the former dockland area has only recently been recognised, and was not taken into account when the draft RSS was prepared. Wirral Council told us that the dockland estate in question was at the centre of the Housing Market Renewal Area, and that its redevelopment would support the efforts of the New Heartlands Pathfinder. The Council suggested that the housing allocation for the Wirral should be increased to 500 pa to take account of this. 6.74 Birkenhead forms part of the inner city area of the Merseyside conurbation. More intensive residential development there would be consistent with the spatial development priorities outlined in Policy RDF1 above. We consider that the RSS should make provision for a net increase of 9000 dwellings in the Wirral. 6.75 We see no reason to propose any change to the housing provision for Ellesmere Port and Neston as shown in the draft RSS. Some house-builders pressed for an increased housing allocation in Chester, above the 7500 net additional dwellings for which the draft RSS makes provision. However, we are not persuaded that this would be desirable, having regard to the

Organisation:	3. What other policy changes are required to RSS to deliver this option and why?
	importance of conserving the city's special character and preserving its Green Belt setting. We note that the 2003-based projection indicates an average increase of less than 300 households a year in Chester during the RSS period. we consider that the proposed annual average provision of more than 400 dwellings there should be ample. We consider that the reference to the "economic growth of Chester" in parpgraph 9.19(1) of the draft RSS should be replaced by a reerence to the "economy of Chester."
Bartonwillmore on behalf of Paycause Ltd	there will be a need to consider an early review of Green Belt land policy in the LIverpool City Region. However, where a potential opportunity exists for Growth Point status to be put forward by developers in order to meet housing demand within the Liverpool City Region and in particular to meet the growing housing needs of Chester this may demonstrate very special circumstances to warrant early release. We note the Yorkshire and Humber Plan is undertaking a review following its publication in May 2008, where there is a "Call for Evidence" for developers to put forward potential Growth Points/Areas, areas for New Settlements an major expansion areas. Paycause believes it ahs interests which could help deliver increasing housing demands in Chester and would welcome the opportunity to discuss this with the NWRDA and put forward its interests fromally at the regional level which could be used to inoform NW RSS spatial policy.
National Trust	No specific comments.
Lancashire County Council	The HMRI Pathfinder Areas and the Lancashire Coastal Towns (identified as Regeneration Priority Areas in the approved RSS [RPG13]are primarily regeneration initiatives. The rationale for including these under the heading 'Broad Location - Growth Points and Economic Towns' is unclear. The key issue here is to 'Marry Opportunity and Need' as set out in Policy DP6 of the current review of the RSS (Secretary of State's Proposed Changes).
Cheshire West and Chester (comments represent informal officer views)	It is questionable whether some of these locations could deliver the levels of housing development required, particularly West Cumbria and Furness and Housing Market Renewal areas. We are confident that West Cheshire can successfully and sustainably deliver the outputs required as a New Growth Point.
Satnam Planning Services Ltd	Substantially increased provision figures for Warrington and Chester, recognising thier roles as existing engines of the region with the capacity to drive the well being of the region forward. Warrington in particular is well placed to enhance it's residential, shopping and leisure role as a major regional centre.
Allerdale Borough Council	The broad locations must reflect the Regional Spatial Framework.
Lambert Smith Hampton	Amend Policy RDF1 to incorporate the broad locations for growth .
Liverpool City Council	The decision by the Secretary of State as to where the New Growth Points are, will need to be reflected in RSS.

Organisation:	3. What other policy changes are required to RSS to deliver this option and why?
Emerson Group	Significant adjustments would be needed to RSS policies. Effectively the Partial Review would need to become a full review.
GVA Grimley (on behalf of Goodman)	No comments.
Forestry Commission	The development of housing will affect all parts of the RSS. The integration of GI planning links directly with policy EM3 on GI but also those on environmental assets, contaminated land, waste, energy, water/drainage as well as many in transport, employment, services etc.
Cumbria County Council / Cumbria Strategic Partnership	It is not clear as to how this is significantly different from current Proposed Changes to RSS (March 2008), aside from the concerns set out above relating to the omissions of other parts of Cumbria that equally deserve mention as part of the Broad Locations.
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	Policies DP1, L4, which relate to locations for development. Key broad locations should be located within these key policies of the NWP.

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

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

Organisation:	4. In taking forward this option, what are the implications for:
PRS FOR PERSIMMON HOMES (LANCS) LTD AND PRIME RESORTS LTD	A) Delivery: No different implications than the NWP
	B) Infrastructure provision? No different implications than the NWP
	C) Community and social issues? No different implications than the NWP
	D) Environment? No different implications than the NWP
	E) Economy? No different implications than the NWP
Campaign to Protect Rural England Chester District	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? 5.37 Housing in Chester is relatively expensive. Much of the city is worthy of conservation. A Green Belt, which serves to protect its setting, restricts its outward growth. The expansion of the built-up area is also constrained by the flood plain of the River Dee. In view of these considerations, opportunities to provide additional housing in Chester must be limited. 5.38 We therefore consider that the location of further regionally significant economic development at Chester would be likely to result in additional commuting and traffic congestion, contrary to the objectives of reducing the need to travel and reducing carbon emissions. Unlike economic development in, say, North Liverpool, it would fail to match opportunity to need. It would be likely to give rise to additional pressure for inappropriate development in the Green Belt, and might well detract from the conservation of Chester's historic fabric. In this connection we note that, in an analysis prepared by the Assembly's consultants, the extension of the Chester Business Park (which is proposed as a Strategic Regional Site in the RES) scored only 24% for sustainability. By comparison the proposed extension of the Wavertree Technology Park in Liverpool scored 95%.
	E) Economy? 5.35 Chester. By contrast, the draft RSS identifies Chester as a location for an unspecified amount of regionally significant economic development. However, the evidence is that there is already an excessive supply of land committed for employment development in Cheshire. Chester has a relatively tight labour market, with a local unemployment rate of only about 1.7%. The city attracts substantial numbers of commuters. The Highways Agency reported that, in the Chester area, the M53 and A55 are already subject to more than 100% stress during the morning

Organisation:	4. In taking forward this option, what are the implications for:
	<p>and evening peak periods. 5.39 We were told by NWDA that Chester is especially attractive to certain types of business, which might not be prepared to locate elsewhere in the North West. In support of this argument, they referred to the fact that Chester provides an environment that is much sought after by "executives and their wives", and offers the additional advantage of proximity to Manchester Airport. We consider the importance of these points to be overstated, and do not accept that they should shape planning policy. In our view, it is most desirable that regionally significant economic development should assist in the regeneration of inner city areas, reduce the need for long journeys to work, and provide jobs in areas of high unemployment. Regionally significant development at Chester would contribute to none of these objectives. For these reasons, we do not consider that Chester provides a suitable location for additional regionally significant economic development.</p>
Bartonwillmore (<i>on behalf of Paycause Ltd</i>)	<p>A) Delivery: Paycause considers there is a need for Green Belt land review, specifically in the Liverpool City Region and in particular Chester, given the dynamics of the district where there is a limited amount of "brownfield land" within existing settlements. It is therefore inevitable that there will be a need to release land beyond the existing settlement limits, but which are in sustainable locations in order to deliver the objectives of PPS1, PPS3 and PPG13. Delivering land needs to have the willingness of landowners and in the case of clients landholdings, their strategic site is suitable, available and achievable</p> <p>B) Infrastructure provision? There is a need for a coordinated response received from all statutory undertakers in particular the Environment Agency and Drainage authorities in order that the constraint implications can be understood and future growth planned for in a proper, phased and coordinated manner. There will also need to be comments from the relevant highways authorities and where appropriate the highways agency in order that a clear understanding of the potential traffic issues are fully taken into consideration.</p> <p>C) Community and social issues? There is a need for a coordinated response received from all statutory undertakers in particular the Environment Agency and Drainage authorities in order that the constraint implications can be understood and future growth planned for in a proper, phased and coordinated manner. There will also need to be comments from the relevant highways authorities and where appropriate the highways agency in order that a clear understanding of the potential traffic issues are fully taken into consideration.</p> <p>D) Environment? There will be a need to consider the environmental implications of potential large scale release of land, and as such a balance would need to be struck to ensure suitable mitigation measures implemented to minimise any potential adverse impacts that may arise from</p>

Organisation:	4. In taking forward this option, what are the implications for:
	<p>future development proposals.</p> <p>E) Economy? Sustainable development underpins the planning system principles and as such growth should be directed towards areas/settlements that are able to expand employment areas, reducing the need to travel. This includes for example Chester, which as a key settlement in the Region is able to provide such a role. therefore its potential expansion to the South West of the settlement has the potential for planned sustainable growth and expansion which would underpin the spatial policy for the North West Region in the emerging plan period</p>
Countryside Properties	<p>A) Delivery: 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.</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? -</p> <p>E) Economy? -</p>
National Trust	<p>A) Delivery: No specific comments.</p> <p>B) Infrastructure provision? No specific comments.</p> <p>C) Community and social issues? No specific comments.</p> <p>D) Environment? No specific comments.</p> <p>E) Economy? No specific comments.</p>

Organisation:	4. In taking forward this option, what are the implications for:
Satnam Planning Services Ltd	A) Delivery: Delivery to the north of Warrington can be achieved within a short timescale. Delivery to the west of Chester can be delivered in a similar timescale.
	B) Infrastructure provision? Significant infrastructure, both physical and social, can be provided and updated in north Warrington.
	C) Community and social issues? North Warrington is a deprived area and significant investment is required to alter the lifestyle and aspirations of the people who live there with new and improved services, facilities and environment.
	D) Environment? The land to the north of Warrington is not within the Green Belt and has been allocated for housing in the past. There are no environmental damaging factors associated with its release.
	E) Economy? The economy of north Warrington requires significant investment. Warrington as a whole requires significant investment, higher levels of affordable housing and more family homes.
Carlisle City Council	A) Delivery: -
	B) Infrastructure provision? All growth point bids will have to address infrastructure concerns which was recognised in the programme. As the bids are developed these issues may need further identification in RSS
	C) Community and social issues? -
	D) Environment? -
	E) Economy? Carlisle's economic strategy clearly identifies growth and a broad location for housing growth will assist in the delivery of the economic potential
Allerdale Borough Council	A) Delivery: The omissions from the list of broad locations may mean that there could be inadequate policy guidance in certain areas which in turn could lead to the failure to deliver adequate housing in those areas, or, at the other extreme, to deliver too many houses in those areas thereby undermining the overall spatial framework.
	B) Infrastructure provision? As long as broad locations take into account infrastructure implications there should be no problem.
	C) Community and social issues? As long as the criteria for Broad Locations are widened to include SCSs etc, there ought not to be any problems.

Organisation:	4. In taking forward this option, what are the implications for:
	<p>D) Environment? Again, if the criteria are met, should be no problems.</p>
	<p>E) Economy? This will depend upon the scale of overall housing provision and alignment with economic strategies, and as long as the spatial distribution is right.</p>
Lambert Smith Hampton	<p>A) Delivery: Unable to fully comment on the broad locations for growth being met until the figures have been fully tested and the Housing Land Availability Assessments have been carried out throughout the region.</p>
	<p>B) Infrastructure provision? There is an opportunity to provide improved infrastructure to the areas identified for growth</p>
	<p>C) Community and social issues? There is the opportunity to regenerate brownfield land and affordable housing within the region as a whole.</p>
	<p>D) Environment? Sustainable brownfield sites are more likely to be brought forward for redevelopment throughout the region benefitting the local environment.</p>
	<p>E) Economy? Investment will be encouraged into more areas within the region encouraging the economy to grow.</p>
Liverpool City Council	<p>A) Delivery: Delivery of new housing in the HMR Pathfinder and potentially the growth point in Liverpool is complementary. As priorities for growth, delivery will be focused in this location and as such, it is considered that the requisite numbers can be delivered in a sustainable manner.</p>
	<p>B) Infrastructure provision? Liverpool has infrastructure provision for a larger population than it has at present, particularly in the HMR Pathfinder area, so focusing development in this location would make good use of existing physical, social and community infrastructure. The Expression of Interest for a growth point has included a detailed appraisal of likely infrastructure needs and provision.</p>
	<p>C) Community and social issues? Focusing development in the Pathfinder, Growth Points and the regeneration fringe areas of Liverpool would underpin regeneration in these areas and so help achieve the development of sustainable communities.</p>
	<p>D) Environment? The identified broad locations for growth in Liverpool are in sustainable locations, characterised by brownfield land and often series degrees of environmental degradation. focusing development in these locations will secure environmental improvements and be a major contributor to sustainable development</p>

Organisation:	4. In taking forward this option, what are the implications for:
	<p>E) Economy? The identified broad locations for growth in Liverpool are in, or adjacent to, identified economic growth areas (Liverpool City Centre and the Strategic Investment Areas). Focusing development in these locations will assist in delivering the economic potential of these areas and ensure that opportunities created are widely accessible.</p>
Emerson Group	<p>A) Delivery: Major problems would exist. Land assembly, comprehensive development. Delays to housing delivery would be inevitable.</p> <p>B) Infrastructure provision? Major implications and redistribution of priorities would be needed</p> <p>C) Community and social issues? More new facilities at considerable cost would be required.</p> <p>D) Environment? There could be considerable repercussions.</p> <p>E) Economy? Need to marry need and opportunity.</p>
English Heritage	<p>A) Delivery: -</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? As discussed above the detail of environmental implications in relation to the historic environment needs to be provided. The growth point proposals and broad locations need to be tested through the SA/SEA process.</p> <p>E) Economy? -</p>
CPRE North West	<p>A) Delivery: It is highly uncertain whether any of the growth points can be delivered under current housing market conditions, or indeed whether their delivery would have desirable effects in terms of impacts on Housing Market Renewal Pathfinders and other areas in need of regeneration.</p> <p>B) Infrastructure provision? Any growth points that are taken forward will need robust assessments of infrastructure implications. These assessments are not currently available. In order for an RSS including growth points to be sound, these assessments must be made. Consideration should be given to improving sustainable transport links between west Cumbria / Furness and the rest of the region if housing growth is anticipated there. Significant housing development in the coastal towns should not take place without concurrent development of employment opportunities and services / facilities / amenities, ie social infrastructure.</p>

Organisation:	4. In taking forward this option, what are the implications for:
	<p>C) Community and social issues? Significant housing development in the coastal towns should not take place without concurrent development of employment opportunities and services / facilities / amenities. Careful consideration must be given to integrate all new housing into existing communities and to the provision in good time of adequate employment opportunities and services / facilities / amenities to avoid unacceptable impacts on existing facilities etc. Early and genuine public engagement, in particular in the delivery of any growth point bids, will be necessary to avoid widespread opposition and conflict, and to enable communities to help shape and improve the places where they live.</p> <p>D) Environment? As noted in the criteria, all new housing development must have regard to critical infrastructure and environmental implications. It is not yet clear what those implications are, as the scale of development is uncertain. The implications of the growth points, which are as yet entirely untested, are particularly uncertain. For RSS to be based on a sound evidence base there must be a robust assessment of these implications.</p> <p>E) Economy? A concentration of broad locations in the regional centres and in areas in need of regeneration will be beneficial to the region's economy by concentrating population close to the main economic 'engines' of the region, and improving the image and attractiveness of those areas that are currently lagging as a place to live, work, invest or study, thereby reducing disparities and improving overall economic performance.</p>
Forestry Commission	<p>A) Delivery: GI planning integrated into Growth Point development to make the most of opportunities for sustainable development and sustainable build.</p> <p>B) Infrastructure provision? GI needs to be considered and planned for like other 'grey' infrastructure such as transport. The water and sewerage infrastructure is key to any housing development</p> <p>C) Community and social issues? Well planned GI can foster community cohesion and improve quality of life with health and wellbeing benefits</p> <p>D) Environment? GI provides opportunities to utilise currently un and undermanaged environmental assets to give environmental and biodiversity as well as economic and social outputs. This may involve the regeneration of brownfield or contaminated land. On housing location environmental capacity both in terms of biodiversity and natural resources (water, drainage etc.) must be paramount. Really innovative and creative solutions may possible through working together. As far as the houses themselves sustainable construction is a must using certified timber and woodfuel heating systems where appropriate. GI provides opportunities to</p>

Organisation:	4. In taking forward this option, what are the implications for:
	<p>utilise currently un and undermanaged environmental assets to give environmental and biodiversity as well as economic and social outputs. This may involve the regeneration of brownfield or contaminated land. On housing location environmental capacity both in terms of biodiversity and natural resources (water, drainage etc.) must be paramount. Really innovative and creative solutions may possible through working together. As far as the houses themselves sustainable construction is a must using certified timber and woodfuel heating systems where appropriate.</p> <p>E) Economy? Improvements to image and the associated improvement in attractiveness, marketability and property values makes planning GI into housing development competitive sense. Newlands and similar programmes have shown how this can work.</p>
Cumbria County Council / Cumbria Strategic Partnership	<p>A) Delivery: There is a clear problem that areas elsewhere in Cumbria not mentioned in the Broad Locations would not benefit from adequate spatial planning policy guidance, nor would they receive the development emphasis that they deserve.</p> <p>B) Infrastructure provision? It is not clear as to how local planning policy can be formulated in the absence of coverage in the areas not mentioned in the Broad Locations.</p> <p>C) Community and social issues? As above.</p> <p>D) Environment? As above.</p> <p>E) Economy? As above.</p>
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	<p>A) Delivery: No different implications than the NWP</p> <p>B) Infrastructure provision? No different implications than the NWP</p> <p>C) Community and social issues? No different implications than the NWP</p> <p>D) Environment? No different implications than the NWP</p> <p>E) Economy? No different implications than the NWP</p>