

Matter 4. Living in the North West

(2000 word limit encompasses Matters 4A & 4B)

Matter 4A: Overall Housing Strategy

- (i) Is the methodology and evidence base underpinning the scale and distribution of housing in policy L4 sound? Does the amount and distribution of housing reflect and reinforce proposals for the spatial distribution of economic growth and regeneration priorities (including HMRAs)? Does the distribution of housing reflect the draft RSS's regional and sub-regional spatial framework?

There is some concern in relation to the robustness of the evidence base, which has been used to calculate the proposed policy figures. The Technical Appendix provides a large amount of detail on the various stages of the process, but the overall methodology of how the scenarios are translated into the proposed policy figures is not clear and appears to lack logic.

In our response to the Draft RSS and to the earlier Interim Draft, Halton expressed support for the principle of using economic modelling to estimate housing demand and for these figures to be used to inform (though not determine) housing allocations. The Nathaniel Lichfield work clearly demonstrated the likelihood of strong economic growth and therefore strong demand for additional housing in the Mid-Mersey Sub Region. Given this forecast growth and the environmental constraints faced elsewhere in the sub-region, Halton believe that a housing policy figure significantly higher than the 330 dwellings per annum provided by current RSS (formerly RPG13 – Doc. Ref: REG8) is appropriate. The proposed figure of 500 p.a. for Halton is therefore supported.

The amount and distribution of housing supports the regional and sub-regional spatial framework with a large proportion of the provision in the two regional poles and their surrounding city regions – around 70% of the proposed housing provision is in the city regions of Manchester and Liverpool, which is supported.

Halton supports the principle that the target proportion of housing to be delivered on previously developed land across the region be raised from 70% (RPG13 – Doc. Ref: REG8) to 80% in the Submission Draft, however, the Council has concerns regarding the distribution of targets between housing areas. RPG13 (Doc. Ref: REG8) divided the region into 7 sub-areas allocating "brownfield" targets of between 50 and 90%. Whilst, RSS divides the region into 17 housing typology areas and again allocates "brownfield" targets of between 50 and 90%.

Halton is concerned at the apparent lack of reference to the evidence base concerning potential brownfield supply in allocating brownfield targets. Many authorities are now faced with substantial rises in their allocated target, whilst others see no increase at all. In Halton's case, RPG13 (Doc. Ref: REG8) sought an average of 65% brownfield completions across Merseyside (excluding Liverpool City) and Halton, i.e. across 5 districts. RSS now groups Halton with only 2 other authorities and seeks an average 80% brownfield target. This is apparently without reference to any evidential base that 80% is an achievable target across the 3 districts concerned.

The Greater Merseyside Authorities, of which Halton is a member, have historically voiced concerns regarding the housing typologies in RHS (Doc. Ref: HOU7) which have fed through into the allocations in Table 9.1. Whilst not yet adopted policy, draft PPS3 (Doc. Ref: PP3d) places significant weight on the identification of housing market and housing market assessments but a robust basis for this in the North West will not be developed for some time. As such, there should be an early review of policy L4 and accompanying allocations in Table 9.1 including both total numbers and indicative brownfield targets.

- (ii) Does the draft RSS need to be more flexible in terms of the housing provision to ensure it can respond to changes over the Plan period?

Subject to the proviso detailed in 4(i) above that the housing policies in RSS should be subject to an early review, Halton Borough Council is satisfied that the housing provision in RSS contains sufficient flexibility. In particular Halton supports the additional guidance contained in para. 9.20 which provides additional detail on how individual Authorities should seek to manage their housing allocations.

- (iii) Is the use of maximum targets (net of clearance replacement) for housing completions appropriate in all areas, or is there a need for flexibility to enable planning permissions or completions to be used as a basis to measure the annualised housing requirement against targets?

Halton Borough Council supports specifying that the provision figures are maxima as this adds clarity to the housing provision policy. Expressing the policy in terms of housing completions is most appropriate and most accurate, as this approach monitors and manages the policy outcomes (i.e. the number of new dwellings delivered on the ground), rather than the process (permissions granted or dwellings in the development pipeline) and is consistent with Housing Flows Reconciliation.

Expressing the policy as net unit gain (i.e. completions) allows more flexibility to accommodate significant supply events such as major windfall sites and/or permissions not being taken up due to unforeseen circumstances such as contamination (remediation costs) / reassessed flood risk etc. Such issues would make implementing a policy based on extant consents or permissions granted fraught with difficulties and has the potential to result in perverse outcomes.

- (iv) Should the draft RSS include indicative phasing of the housing figures set out in Table 9.1?

Halton Borough Council is satisfied that the housing provision policies as drafted contain sufficient flexibility and guidance and therefore Halton does not support the introduction of additional phasing criteria.

Halton Borough Council are satisfied that as drafted RSS housing policies provide sufficient flexibility for individual authorities to plan, monitor and manage their housing supply in line with current and emerging national guidance and therefore that any additional phasing criteria in RSS is unnecessary and may in fact prove unhelpful as no prior discussion will have been undertaken between the NWRA and individual LA's regarding local circumstances and prevailing issues.

- (v) Do the housing policies reflect emerging national guidance? Will they help to provide affordable housing and achieve balanced housing markets?

Halton Borough Council broadly supports the draft housing provision allocation for Halton of 500 units per annum net of clearance (2003~2021). The recently completed Halton Housing Needs Study (Doc. Ref: SDL/HBC/1) has identified a shortage of affordable housing units within the Borough and the 500 p.a. housing policy figure will provide a suitable supply of market developments from which the Borough can seek to negotiate supply to address this newly identified shortfall in affordable units.

Matter 4B: Sustainable Communities

- (i) Will the draft RSS help to secure mixed, cohesive, sustainable communities?
- (ii) Are health and education issues adequately addressed in the draft RSS?

Halton Borough Council do not wish to submit any additional response in relation to Matter 4B.