



PARTIAL REVIEW OF REGIONAL
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A1.2
June – July 2008

CONSULTATION REPORT

North West Regional Assembly

PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A1.2

A consultation report from

CAG Consultants

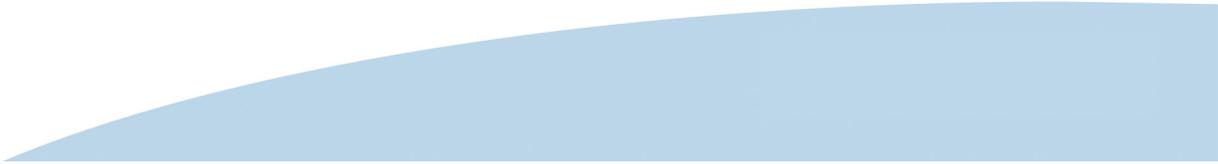
in association with **Concept 4 Creative and Community
Consultants**

July 2008

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Introduction

This report brings together the collated responses to the North West Plan Partial Review consultation on the options Housing

The consultation took place between 1st June and 4th July 2008 and focussed on seeking out stakeholder views on a series of options. These options are show in Appendix One.

Stakeholders were invited to contribute their views in one of the following ways;

- Workshops for stakeholders
- An online or paper questionnaire
- Via a free phone number

Stakeholders also had the opportunity to comment at the earlier Consultation on the Draft Project Plan stage.

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

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

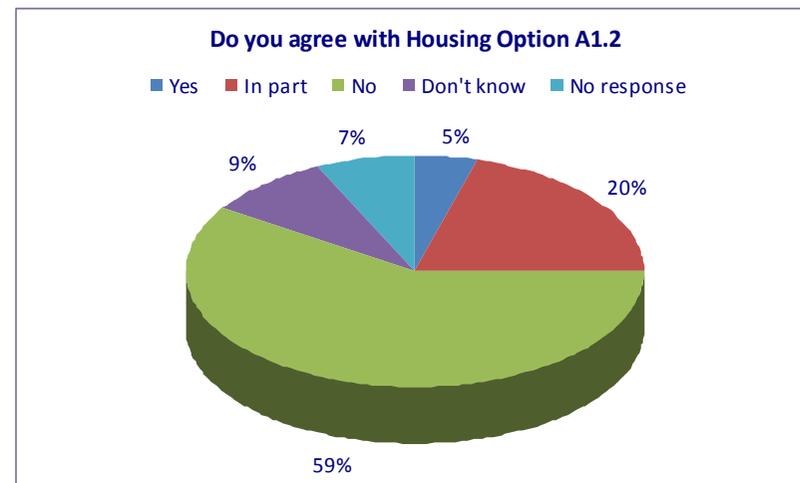
Workshop information, information on comments outside the questionnaire process, information that was received within the Draft Project Plan stage and the options paper are contained in a separate document.



1. Questionnaire Responses

1. Do you agree with Housing Option A1.2?

Do you agree with Housing Option A1.2?	
Yes	2
In part	10
No	28
Don't know	4
No response	3
Total Responses	47



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

Organisation:	1. Do you agree with Housing Option A1.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Indigo Planning Limited	In part			In respect of the potential change in spatial distribution of housing as set out in options A1.1 and A1.2, a revised spatial distribution in the Liverpool City region would remove the emphasis in percentage terms away from Liverpool and Manchester, diverting more housing to the rural area such as South Cheshire. Whilst CEG accepts the need to better provide housing in rural areas, this should not be to the detriment of the main urban areas and the focus on reuse of brownfield sites to deliver sustainable housing and other growth.
Indigo Planning Limited				Whilst the overall increase in housing numbers promoted through the emerging RSS is supported, on the basis that central Government is promoting even higher rates of housing provision, it is not considered that maintaining the currently proposed rate of provision will address the changing policy agenda. The soon to be adopted figures in RSS are only just in line with current housing delivery rates, and thus will not be sufficient to make the step change which the Government seeks, and which is needed to kick start the delivery of affordable North West Plan Partial Review Planning,

Organisation:	1. Do you agree with Housing Option A1.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>Transport and Housing Directorate North West Regional Assembly Wigan Investment Centre Waterside Drive Wigan WN3 5BA By email and post NWPRR@cagconsult.co.uk 2 July 2008 Our ref. DH/SW/192007/06 Page 2 of 3 housing. As is noted in Appendix 2, Chester has a pronounced affordability problem, and therefore continuing the current housing delivery rates in towns such as Chester will not enable them to step up delivery of new housing to meet local needs. Furthermore, maintaining the current figures will not account for additional housing provision required as a result of successful Growth Point bids, which have been specifically made, inter alia, to address housing need issues across the region. In respect of the potential change in spatial distribution of housing as set out in options A1.1 and A1.2, a revised spatial distribution in the Liverpool City region would remove the emphasis in percentage terms away from Liverpool and Manchester, diverting more housing to the rural area such as South Cheshire. Whilst CEG accepts the need to better provide housing in rural areas, this should not be to the detriment of the main urban areas and the focus on reuse of brownfield sites to deliver sustainable housing and other growth.</p>		
Environment Agency	In part	<p>In terms of the ultimate quantum of growth, the comments made in relation to option A1.1 apply to this option (including the implications of the extra growth beyond 2021). The Environment Agency has no particular view on the merits of whether the growth follows the same urban concentration approach as emerging RSS or whether a greater proportion of it is placed in rural areas. Both have implications on the environment, sustainability and infrastructure capacity. The implications of any revised spatial distribution may have specific impacts which have yet to be considered. For example, our work with United Utilities on waste water treatment capacity demonstrated that minor growth in some rural areas could have as least as many implications for infrastructure capacity as major growth in urban ones. Whilst it is possible that a revised spatial distribution could be accommodated sustainably, this has not been specifically examined. If this option was to be progressed, the Environment Agency would want work with the NWRA and others to help understand its implications.</p>		
GONW	Don't know	<p>As per A1.1 in relation to the overall level of housing. Following our initial comments we are still convinced that there are further additional spatial options which have not been considered. In relation to the redistribution in favour of rural areas, we would</p>		

Organisation:	1. Do you agree with Housing Option A1.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>raise the following points</p> <ul style="list-style-type: none"> • We support the need to address sustainability of rural communities. It is acknowledged that in some rural communities there are severe issues of affordability, such issues need to be addressed as does the need to support services and facilities. We are not clear about how the options relate to some of these issues and query whether the outcomes of the options would be those desired. • Can it be clarified what the purpose of the redistribution of housing to rural areas is , for example is to ensure an increase in purely affordable housing or to allow more development in general, there may be funding issues if it is about increasing affordable housing where subsidy is required. • Will such a response fit within the spatial framework of RDF1 and RDF2 and is it a disproportionate response which may undermine the clear priorities set out in RDF1 and RDF2. Will such a policy lead to a relaxation of development outside KSC and LSC and how would such approach meet the need for development to reduce the need to travel and other DP policies? • What is the evidence base for the scale and distribution of the requirement in rural areas. The above comments relate to all options which are based on rural redistribution. 		
Bartonwillmore on behalf of Paycause Ltd	No	<p>Paycause considers the Liverpool City Region is a key area in accommodating growth in the north west to meet the RSS spatial approach. It is noted that it is diverse in terms of settlement scale and pattern. Our clients believe that Chester plays a key role in the LCR and wider region where it is also acknowledged by this Housing Options Paper that there are cross boudary issues with Flintshire and West Cheshire of which Chester falls within. Therefore in order to deliver the core approach our clients do not consider it appropriate to distribute growth towards more rural areas, which may lead to a more unsustainable pattern of development. It would be more apporprate to concentrate on "higher order" settlements, such as Chester whose hinterland could accommodate fruther growth that is deliverable.</p>		
Preston City Council	No	<p>There is no justification put forward for a 31% increase in the spatial allocation based on rural need and such a spatial distribution would increase pressure for housing development in unsustainable locations.</p>		
Halton Borough Council	No	<p>The shift towards rural provision (options A1.2, A2.2 and A3.2) would see the balance of housing in the major urban areas – the Liverpool and Manchester City Regions – reduced, in the expectation that providing a greater proportion of housing in the rural areas would help to tackle affordability problems in those areas. This would represent a</p>		

Organisation:	1. Do you agree with Housing Option A1.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		major shift in the spatial priorities of RSS, and would potentially undermine efforts to revitalise the urban parts of the region.		
National Trust	No	First and foremost it is considered that overall new development should maintain an urban focus having regard to the sustainable location of new development and the availability of infrastructure. An added emphasis on rural housing is best addressed through local assessments of requirements and allocations either at Housing Market Area level or in individual LPAs LDFs.		
Blackpool Council	No	It is by no means clear how well this has been thought out. Such a redistribution directly conflicts with the key spatial priorities fundamental to NWRSS and national planning policy guidance, and would have huge implications for the patterns of delivery of new housing development against Policy RDF1. It is unclear how or why this scale of change is justified, or could ever be delivered in appropriate locations. The redistribution seems a huge over-reaction to the concerns raised by the Affordable Rural Housing Commission and the Council for Rural Communities. Other rural lobbies and the communities in these areas may have different views – and these changes seem to go to the very heart of NWRSS. The rural 'increase' can just as accurately be described as an urban 'decrease'. Against the A1.1 figure of 10,862, the 9,244 A1.2 figure represents a 15% fall in provision in the Manchester City Region and, likewise, a fall of 12% in the Liverpool City Region. Although the figure for the Central Lancashire City Region actually goes up from 16% to 21% (reflecting it includes many rural areas too) the implication is that when this is fed through to district level figures on a consistent policy basis, it will similarly redistribute housing delivery within the CLCR away from the main urban centres. Given NWRSS regeneration and basic sustainable spatial priorities this is not supported. The impact in rural locations is even more pronounced. In Cumbria and North Lancashire, for example, the increase from 9.5% to 15% represents a huge rise of over 60% in total numbers. This scale of change would have an extreme impact on the ground on many smaller rural towns and villages, implying in their terms major development and expansion - whilst at the same time undermining growth and sustainable development RDF priorities in the main urban areas. Given since draft NWRSS, growth point bids focused on the main urban areas are now also coming forward, there is a more valid case for increasing the distribution towards not away from the Growth Point and Eco-town locations as set out in the		

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		Options consultation		
NHF	No	<p>It is by no means clear how well this has been thought out. Such a redistribution directly conflicts with the key spatial priorities fundamental to NWRSS and national planning policy guidance, and would have huge implications for the patterns of delivery of new housing development against Policy RDF1. It is unclear how or why this scale of change is justified, or could ever be delivered in appropriate locations. The redistribution seems a huge over-reaction to the concerns raised by the Affordable Rural Housing Commission and the Council for Rural Communities. Other rural lobbies and the communities in these areas may have different views – and these changes seem to go to the very heart of NWRSS. The rural 'increase' can just as accurately be described as an urban 'decrease'. Against the A1.1 figure of 10,862, the 9,244 A1.2 figure represents a 15% fall in provision in the Manchester City Region and, likewise, a fall of 12% in the Liverpool City Region. Although the figure for the Central Lancashire City Region actually goes up from 16% to 21% (reflecting it includes many rural areas too) the implication is that when this is fed through to district level figures on a consistent policy basis, it will similarly redistribute housing delivery within the CLCR away from the main urban centres. Given NWRSS regeneration and basic sustainable spatial priorities this is not supported. The impact in rural locations is even more pronounced. In Cumbria and North Lancashire, for example, the increase from 9.5% to 15% represents a huge rise of over 60% in total numbers. This scale of change would have an extreme impact on the ground on many smaller rural towns and villages, implying in their terms major development and expansion - whilst at the same time undermining growth and sustainable development RDF priorities in the main urban areas. Given since draft NWRSS, growth point bids focused on the main urban areas are now also coming forward, there is a more valid case for increasing the distribution towards not away from the Growth Point and Eco-town locations as set out in the Options consultation</p>		
Local Resident	No	<p>Policy RDF1 prioritises growth lastly to the rural areas (including all of Eden). The redistribution option and other higher numbers options and their similar rural redistributions are totally unrealistic, and it is hard to think have been properly thought out. Such a redistribution directly conflicts with the key spatial priorities fundamental to NWRSS, is unjustified, and could never be delivered. The redistribution seems to be</p>		

Organisation:	1. Do you agree with Housing Option A1.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		based on affordable housing concerns which are now across much of the country, and to population forecasts based on a continuation of unsustainable further inward local in-migration, rather than meeting local needs. The impact in rural locations is extreme. In Cumbria and North Lancashire, the increase from 9.5% to 15% represents a huge rise of over 60% in total numbers. This would have an extreme impact on many rural areas.. In districts like Eden this will lead to what can only be described as ridiculous levels of planned growth.		
Colliers CRE on behalf of David McLean Homes Ltd	In part	Given that the emerging RSS has not yet been approved we believe that there needs to be a period of reflection while the market adjusts to the relaxation of housing restrictions which are now becoming evident across the region. This period of reflection comes at a difficult time for the housing market generally but at this point there is little need to depart from the strategy put forward by the Secretary of State in her Proposed Changes to the Draft RSS although it is accepted that increased rates of building may be required in the future. Such increased rates need to be directed to those areas with the capability or capacity to absorb further growth and in the context of South Cheshire the important role of Crewe as a regional town needs to be maintained.		
Lancashire County Council	No	in terms of overall provision this option would not address the agenda set out in the Housing Green Paper. It is unlikely to fall within the range to be proposed by the NHPAU. The Option would not be able to accommodate the levels of growth envisaged in the submitted Central Lancashire, Blackpool Growth Point Expression of Interest.		
Cheshire West and Chester (comments represent informal officer views)	No	This option appears to have been discounted because it does not met the objectives of the Housing Green Paper		
Macclesfield Borough Council	No	This would have the effect of decreasing the proportion of provision in the Manchester and Liverpool City Regions and increasing the proportion in the Central Lancashire City Region, Cumbria and North Lancashire.A major spatial redistribution for provision of new housing towards rural areas is not necessary or desirable. Whilst affordability in rural areas is an issue, a major spatial redistribution would be a blunt instrument with which to tackle the problem. Other policies specifically targeted at delivering affordable housing schemes in rural areas would be more appropriate and effective than simply		

Organisation:	1. Do you agree with Housing Option A1.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		increasing the provision for both affordable and market housing in rural areas. The potential increase in overall housing figures for the region combined with the potential increase in the proportion of provision for rural areas would lead to excessive and inappropriate development in rural areas. This top-down approach is not needed and conflicts with the rural affordable housing strategy.		
Haslington Parish Council	No	Increased burden on rural communities to host additional housing.		
Oldham Rochdale Partners In Action	No	Please see response to option A1.1 The pathfinder is unable to support options such as A1.2, A2.2 and A3.3. The Partial Review should ensure that the priority of the regional spatial strategy remains centred on regeneration and growth in the major conurbations. Diverting growth could jeopardise gains made in recent years in the regions major conurbations. Again, it is difficult to be more positive about these options in the absence of a clear understanding of the implications.		
Merseyside Policy Unit	No	5.7 The shift towards rural provision (options A1.2, A2.2 and A3.2) would see the balance of housing in the major urban areas – the Liverpool and Manchester City Regions – reduced, in the expectation that providing a greater proportion of housing in the rural areas would help to tackle affordability problems in those areas. This would represent a major shift in the spatial priorities of RSS, and would potentially undermine efforts to revitalise the urban parts of the region, and therefore they are not options which we could support.		
Copeland Borough Council	In part	We agree with the level of provision but would wish to see the Review include a new balance of distribution across Cumbria which would ensure that the regeneration priorities of West Cumbria are protected. The NWRA is a partner in the West Cumbria Strategic Forum along with all government depts and local authorities. Their joint commitment is to implementing the West Cumbria Masterplan (Britain's Energy Coast, 2007) and this estimates a requirement for up to 20,825 new dwellings over the period 2007 - 2032. However, if current RSS levels of distribution are maintained there is a danger that general housebuilding rates in the east and north of the County could jeopardise the markets in Copeland and Allerdale and thereby weaken the efforts towards the regeneration of West Cumbria.		

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NWDA	In part	<p>We acknowledge the intention behind considering an alternative spatial distribution as part of the options paper, namely to take account of concerns raised by the Affordable Rural Housing Provision and the Commission for Rural Communities as to levels of housing provision in rural areas proposed by Draft RSS. However, we feel that any proposed spatial distribution should be sufficiently flexible to allow both for the accommodation of any successful growth points within the region and any spatial priorities which may emerge from work on the Regional Strategy commissioned by the Regional Strategy Team. Whilst the need to ensure an adequate provision of rural housing is an important objective in itself, equally desirable is ensuring sufficient flexibility in order to accommodate any successful housing growth points. Whilst there may be a tension in achieving both these aims, we feel that the principle of achieving a balance should nonetheless be central to the development and testing of any proposed alteration in the spatial distribution of future housing provision. The option paper states that the Partial Review will utilise identified Housing Market Areas (HMA) as spatial building blocks, in line with PPS3 requirements, and that within this framework, RSS will also set out housing figures for each Local Planning Authority (LPA). As it is intended that housing provision will be determined in line with HMAs, building upon the NWRA commissioned Strategic Housing Market Assessment work, it would be desirable to set out the proposed methodological approach to disaggregating housing figures at the LPA level. We anticipate the opportunity to comment upon any proposed methodology during the course of the Partial Review.</p>		
RPS Planning	No	This option still proposes the same level of provision as the existing RSS.		
Satnam Planning Services Ltd	No	This option will not provide the amount of housing required to support the region and will lead to high levels of commuting.		
Carlisle City Council	In part	<p>If RSS levels are to remain the same then the greater proportion of development directed to Cumbria is welcomed to assist in delivery of Carlisle's economic growth. There are however doubts that having just established RSS targets the redistribution of the housing is feasible.</p>		
Liverpool City Council	No	<p>This option would see a reduction on housing supply for the Liverpool city region. This would not be acceptable on the grounds that it would: 1. Undermine economic regeneration taking place in the City Region and in Liverpool. The need to provide the</p>		

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		right numbers and mix of housing is critical for Liverpool to maximise the benefit of this economic growth. It could also seriously undermine the HMR pathfinder and other regeneration programmes; 2. A lower figure for LCR would have serious implications for the delivery of affordable housing, an issue which is becoming pressing in certain locations in the city region; and 3. Much of the City Region, and Liverpool in particular, can accommodate new housing on brownfield land in sustainable locations. Diverting new housing supply and development away from Liverpool and its city region would have implications for the regional brownfield target and sustainable development. There would also be the need to provide new infrastructure, much of which is already in place in Liverpool.		
Highways Agency	Don't know			
Lambert Smith Hampton	No	The 'do nothing' approach is widely accepted as being inappropriate as emerging RSS housing provision figures are based on historic data. It would perpetuate issues that have arisen recently e.g. increasing house prices especially in areas where restrictions have been put in place. Affordability is now a critical issue for every local authority. It would also not support the Government's objective of significantly increasing housing supply as set out in the Housing Green Paper. To retain this level of housing provision would not provide the flexibility, choice and support to enable the region to grow and prosper over the next 25 years. It would also limit the amount of rural housing provision which could be supplied. We support the decision to review the spatial distribution in general terms. However, we question what basis is the justification for revising the spatial distribution to reflect the MSOA and the lower quartile earnings to lower house prices only. This fails to recognise the potential regeneration needs of those settlements not within Manchester and Liverpool City Regions. How do you know that these percentages accurately reflect all housing needs outside the two City Regions. On the basis that the current housing provision was skewed towards encouraging investment into the areas of need in Manchester and Liverpool City Regions it is not unreasonable to include other areas in need of regeneration.		
pioneer property services	No			
West Lancashire District	Yes	Although it lessens the proportion of development in the Liverpool City Region, it is		

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Council		uncertain what impact this would have upon West Lancashire, unless the District's percentage of housing within the Liverpool City Region remained constant at 5%, which would give a target of 265 units a year. Whilst on the low side, housing could be targeted to areas of the District to deliver this.		
Emerson Group	No	Would perpetuate underprovision in the face of more up to date population and household projections. No point in considering the spatial distribution on this basis.		
LDNPA	No	Option A1.1 already provides for the spatial distribution appropriate to the LDNP. The RSS will provide for all new housing to be in keeping with the scale and type that has been identified as appropriate to the areas strict requirements on meeting identified local and affordable needs of the locality. The figure is set as a minimum therefore the provisions in the RSS provide the flexibility for all new housing development in the LDNP to contribute towards increasing the level of provision in rural areas. We would not like to see proportions imposed at this stage of the RSS. This needs to be monitored through the Annual Monitoring Report to assess the effectiveness of the policy approach.		
GVA Grimley (on behalf of Goodman)	No	There are two main issues with this approach: 1. The recommended increase in housing numbers has not been addressed. 2. Providing more homes in rural areas as a general policy approach may not meet specific areas of demand and could lead to the neglect of some areas in severe need (whether rural or urban).		
Allerdale Borough Council	No	This option would give more flexibility in the delivery of affordable housing in that it could enable lower quotas (assuming more "open market" housing can be delivered). It could also, in theory, assist the implementation of the "Growth Point" process if Carlisle is so designated. Part of northern Allerdale is in the Carlisle Strategic Housing Market Area, and it is likely that the delivery of the Carlisle Growth Point will, in part, rely upon sites in north Allerdale, e.g. in Wigton. It could also facilitate the delivery of the more aspirational elements of the "Energy Coast" Masterplan for West Cumbria. However, the ability of the local housing market to deliver such numbers, which are substantially above trend, is dubious, and therefore on balance, this option is not supported.		
Taylor Young Ltd	In part			

Organisation:	1. Do you agree with Housing Option A1.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Upper Eden Community Plan Group	Don't know			
Wirral MBC	Yes	Wirral would be able to contribute to the delivery of this Option based on existing agreements, on the assumption that Wirral's requirement would be slightly reduced from the 500 pa set out in the Proposed Changes		
Pendle Borough Council	No	The change in the spatial distribution may mean an increase in the average annual figure for Pendle however, it is unlikely to be a sufficient enough increase to help meet the needs and demands identified in the Burnley and Pendle SHMA. The SHMA for Burnley and Pendle indicates that there is a gross overall demand for new dwellings in the Pendle area. The SHMA identifies an annual provision figure of 275 dwellings which is higher than the figure proposed in this option. The annual figure for Pendle under this option (calculated as 232 on the basis of the current percentage split between authorities in the Central Lancashire City Region) is lower than the current average annual build rate within the borough which stands at 270 (over the last 5 years). It should also be noted that this average build rate will have been affected by the restrictive policy position which is currently in place. If this policy restriction were to be removed the build rates are likely to increase. Population projections and increases in household formation suggest that there will be an increase in the number of dwellings required to accommodate the population over the next 18 years. This evidence indicates that there is a need to provide a higher housing provision figure for Pendle.		
Congleton Borough Council	No	Due to the currently available evidence, alongside National guidance, it does not appear logical to continue with the level of overall provision set out in the Proposed Changes to the Submitted Draft RSS. Therefore Option A1.1 and Option A1.2 are not supported.		
NW Transport Roundtable	No	There is no robust case for these figures and the environmental capacity does not exist.		
Cheshire East Council	No	As option A1.1, this option would not address the agenda set out in the Housing Green Paper and is unlikely to fall within the range suggested by the National Housing and Planning Advice Unit. The shift towards rural provision would be difficult to argue on sustainability grounds		
Lancaster City Council	Don't know			

Organisation:	1. Do you agree with Housing Option A1.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Cumbria County Council / Cumbria Strategic Partnership	No			<p>As a general point of concern, all the Options conflate Cumbria and North Lancashire into one Sub-Region, which is not considered appropriate, given that Cumbria wishes to see separate and clearly defined housing figures for the county. It is also very difficult to make realistic responses to projected levels of new housing as far ahead as 2032, based on unknown factors and very broad assumptions. It is not clear under Option A1.2 that the figure of 3,467 for Cumbria and North Lancashire should necessarily mean that Cumbria would retain the current proportionate split of the Proposed Changes to RSS (currently 1,796 for Cumbria and 400 for Lancaster = 2,196).</p> <p>Assuming the proportionate split remains the same, Option A1.2 would, in effect, increase the annualised housing requirement from 1,796 dwelling units in Cumbria to 2,836 units per year, which would equate to 57.9% (i.e. % x 3,467-2,196 from Option A1.2 table applied to Proposed Changes RSS Cumbria figures).</p> <p>To illustrate the level of increase at a local level, if this were to be distributed amongst the districts based on the current Proposed Changes to RSS proportions, this would result in the following annualised housing requirements: Allerdale - 422; Barrow – 237; Copeland – 363; Eden – 377; SLDC – 632; LDNPA – 95; and Carlisle – 710 units (Total 2,836).</p> <p>Data held by Cumbria County Council shows that the previous historic 10-year (1996-2005) average annual rate of dwelling completions in Cumbria were: Allerdale – 222; Barrow – 110; Copeland – 205; Eden – 223; SLDC – 328; LDNPA – 131; and Carlisle – 393 dwelling units (Total 1,612).</p> <p>It is considered that the proposed 57.9% increase would provide greater flexibility for District Authorities to meet identified affordable housing needs, given that the County-wide Housing Needs Survey indicates there is a need for 1,299 affordable dwelling units per year over the 5-year period 2006-2011. It would also enable open market needs to be better met as a component of the overall housing need, given that there is an expectation amongst partner organisations to increase future economic growth comparable to the rest of the North West.</p> <p>However, it is considered that there are likely to be significant implications for the spatial development framework in the RSS, and there is likely to be a need to change the proportions of development attributed to each district in Cumbria, as well as consider the proportions of development that might be appropriate to Key Service</p>

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		<p>Centres, Local Service Centres and rural settlements.</p> <p>There are concerns that there should be sufficient levels of new housing proposed in the Partial Review of RSS for West Cumbria to satisfy the Energy Coast master plan, which has suggested that there should be 5,500 new dwellings over and above the current Proposed Changes to RSS up to 2026. It is considered that there should be sufficient flexibility in the RSS for these Districts to respond to the growth agenda for West Cumbria. At the same time, it is considered important that any new growth in South & East Cumbria should not be at the expense of regeneration efforts made in West Cumbria.</p> <p>There is also a concern that within South Lakeland, the level of new housing (400 new dwelling units per annum) identified in the current Proposed Changes to RSS is near to the environmental capacity of that area to absorb new housing development. It will be important that any growth in South and East Cumbria should specifically meet identified local and affordable housing needs as a priority, and respect the environmental capacities of these areas.</p> <p>The significant increases in overall housing provision set out in this Option need to consider the implications for planning authorities in their management of future supply and their ability to give priority to meeting local needs. For example, in South and East Cumbria, new housing provision will need to prioritise meeting the evidence of local needs, including significant levels of affordable housing. High levels of unfettered housing development would clearly have implications for environmental resources and put pressure on the limited infrastructure capacity. Certainly existing policy measures would need to be retained to reduce the adverse impacts of second home ownership and retirement immigration on housing availability for local people. In West Cumbria, high levels of provision need to be applied with care to ensure the existing programmes for housing renewal and major urban regeneration are not prejudiced by more commercially attractive greenfield housing development.</p> <p>It is for this reason that it may not be appropriate to maintain the proportionate District split of the current Proposed Changes to RSS within Cumbria, and that a revised level of new housing will best be identified on the evidence of the Cumbria-wide Strategic Housing Market Assessment. The approach being taken in the preparation of the Cumbria SHMA incorporates an assessment of demographic change and household</p>		

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		formation. This is considered to be a critical aspect in determining future housing needs. This needs assessment should be supplemented with an assessment of the local affordable housing requirement as well as consideration of future growth aspirations with the overall aim of producing a single figure covering these aspects.		
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	In part	We agree in part with this option: we do not agree with the overall level of housing provision in this option for the reasons we have set out in our response to the previous option. However, we agree with the percentage distribution as this will better address need and affordability issues.		
Crewe and Nantwich Borough Council	No	As option A1.1, this option would not address the agenda set out in the Housing Green Paper and is unlikely to fall within the range suggested by the National Housing and Planning Advice Unit. The shift towards rural provision would be difficult to argue on sustainability grounds		

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

The table below shows the verbatim comments received.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
Environment Agency	The Environment Agency feels that until 2021 this option can probably be delivered with little or no changes to other policies within RSS. As with option A1.1 the policy impacts of growth beyond 2021 need to be considered. However, consideration of the existing policy framework in light of a revised spatial distribution will be required. Do the policies still work as well with a more rural spatial focus? The Environment Agency would wish to be involved in helping consider any implications on the wider policy framework. We'd see this as forming and integral part of our input into helping assess the wider capacity and sustainability issues of accommodating higher levels of growth. Therefore if this option is progressed we would expect any rural specific issues to be picked up in the work on developing the evidence base and policy framework.
Bartonwillmore on behalf of Paycause Ltd	Option not supported.
National Trust	Given the likely 'surplus' of allocations at least in the next few years it will be important to have phasing policies in place so that initially development is directed to where it is most needed to meet social, economic and environmental objectives, rather than 'easy' sites being picked off first that are less beneficial.
Blackpool Council	Such a redistribution in Blackpool's view require a fundamental review of the spatial priorities and focus of many of the policies throughout NWRSS.
Liverpool City Council	No Comment
Highways Agency	A revised spatial distribution might raise tensions with other RSS policies such as RDF1 or employment location policies, thereby prompting the need for a further review of the plan.
Lambert Smith Hampton	In terms of housing numbers the policy maintains the status quo and therefore no policy would need to change. Policy UR7 of the RSS and Policy L4 of the emerging RSS would need to be amended to reflect the amended spatial distribution of housing as well Policy SD1 of the RSS and Policies RDF1 and RDF2 of the emerging RSS.
Emerson Group	None required as this is an obsolete figure in the light of projections and NHPAU range.
LDNPA	This could have an impact on PDL figures. Lobby Central Government to change the use of agricultural building to brownfield category.
GVA Grimley (on behalf	No changes should be made to deliver this option.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
of Goodman)	
Allerdale Borough Council	The adoption of such figures may require the review of the spatial distribution of housing numbers in Cumbria. For instance, it is understood that South Lakeland DC (this is, of course, subject to their submitted comments) are not supportive of an increase in their housing figure above that in the current "Proposed Changes", and so any shortfall would have to be made up by other districts. It may be appropriate to allocate the shortfall to Regeneration Priority Areas eg. West Cumbria, but as stated above, the delivery of such figures is dubious.
Taylor Young Ltd	I still think that the target numbers should be increased as I believe that they are based on figures that may be dated - certainly over the course of the RSS
Upper Eden Community Plan Group	See our response to A1.1. We do not feel competent to comment on the distribution of housing across the whole region. However, we feel very competent to comment on the distribution of housing within Eden, and a lesser extent within Cumbria.
Pendle Borough Council	A higher housing figure for Pendle could be achieved by changing the percentage split between authorities within the Central Lancashire City Region or by increasing the overall figure for the Central Lancashire City Region.
NW Transport Roundtable	This option should not be progressed and RSS policies should not be altered to enable this option. It would be too environmentally damaging.
Cheshire East Council	See response to A1.1
Lancaster City Council	These comments can be repeated for A1.2 to A3.2. Significant growth cannot just be justified by simply sharing out overall figures in sub region. N Lancs and Cumbria is not characterised by urban trends. There must be spatial rationale and evidence to demonstrate why this level of growth is justified outside the main urban conurbations. There must be evidence of local population growth or migration around Morecambe Bay, or figures to show that outward migration trends (eg :young people from S lakeland) have to be reversed, to justify new housing in these areas. Without such evidence it is highly unlikely that Local planning Authorities will be able to obtain political and community support to deliver higher growth figures.
Cumbria County Council / Cumbria Strategic Partnership	There are likely to be implications for the spatial distribution and development emphasis given to the Key Service Centres, Local Service Centres and rural areas with Option 2.2 (i.e. Policies RDF1, RDF2), and the Spatial Principles in DP1 as well as WW3 and W5. The Overall Spatial Priorities for Cumbria (Policy CNL1) the Sub-Area Development Priorities (Policy CNL2) and the Spatial Policy for the Lake District may require reconsideration. It is considered highly likely that if the level of development proposed in this scenario were to be implemented, there could be problems for those LDFs already at an advanced stage of preparation, as well as those Local Plans recently adopted. Consideration might need to be given to some landscape designations, taking account of

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	<p>where new development is likely to take place, and the spatial distribution of new development.</p> <p>It may not be appropriate to maintain the proportionate District split of the current Proposed Changes to RSS within Cumbria, and that a revised level of new housing will best be identified on the evidence of the Cumbria-wide Strategic Housing Market Assessment. Any proportionate split will need to take account of the aspirations for growth in West Cumbria through the Energy Coast master plan, and the environmental and infrastructure constraints within South and East Cumbria and Carlisle.</p>
<p><i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.</p>	<p>The distribution will need to be reflected in Table 7.1</p>

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

The table below shows the verbatim comments received. We have removed 18 blank responses.

Organisation:	3. In taking forward this option, what are the implications for:
Environment Agency	<p>A) Delivery: As for option A1.1, this is the one that is most likely to be deliverable. However, consideration of any delivery issues resulting from its more rural focus will need to be required. Also, implementation of various policies within RSS will be essential (particularly EM5). This may be challenging for the region. We would welcome involvement into any revision of the RSS implementation plan to ensure all those responsible for implementation are identified and ways of measuring successful delivery are put in place.</p>
	<p>B) Infrastructure provision? Out of all the options, certainly up to 2021, this option is the one likely to have the lowest impacts on infrastructure provision. However, we still concluded that accommodating even 416,000 new homes would be challenging, especially if spatial and infrastructure planning were not carried out in a more integrated fashion. There will also be specific infrastructure issues if a more rural focused spatial distribution approach is adopted. The implications of this would have to be considered if this option was to be progressed.</p>
	<p>C) Community and social issues? NC</p>
	<p>D) Environment? We can probably conclude that the level of growth within the do nothing option can be accommodated sustainably and its environmental impacts managed. However, consideration needs to be given to the impacts of growth beyond 2021 as well as any specific impacts arising from a revision to its spatial distribution. We would welcome the opportunity to be involved in this.</p>
	<p>E) Economy? NC</p>
Bartonwillmore (<i>on behalf of Paycause Ltd</i>)	<p>A) Delivery: Paycause considers the Liverpool City Region is a key area in accommodating growth in the north west to meet the RSS spatial approach. It is noted that it is diverse in terms of settlement scale and pattern. Our clients believe that Chester plays a key role in the LCR and wider region where it is also acknowledged by this Housing Options Paper that there are cross boundary issues with Flintshire and West Cheshire of which Chester falls within. Therefore in order to deliver the core approach our clients do not consider it appropriate to distribute growth towards more rural areas, which may lead to a more unsustainable pattern of development. It would be more appropriate to concentrate on "higher order" settlements, such as Chester whose hinterland could accommodate further growth that is deliverable. We note that Paycause have land that is deliverable and in accordance with paragraph 54 of PPS3 their land is</p>

Organisation:	3. In taking forward this option, what are the implications for:
	suitable, available an achievable.
	B) Infrastructure provision? Option not supported.
	C) Community and social issues? Option not supported.
	D) Environment? Option not supported.
	E) Economy? Option not supported.
National Trust	A) Delivery: No additional comments
	B) Infrastructure provision? Infrastructure capacity may be a greater constraint, and more expensive issue to resolve, in more remote locations.
	C) Community and social issues? No additional comments
	D) Environment? Potentially there will be more difficult issues in terms of the impact of development upon landscape character and upon natural and built environment assets and their settings.
	E) Economy? No additional comments
Blackpool Council	A) Delivery: It will undermine delivery of the sustainable urban development focus of NWRSS and have a major impact on the appearance and character of many rural settlements across the region.
	B) Infrastructure provision? It will result in a re-focus of more dispersed provision away from the main centres - where existing infrastructure and facilities are concentrated, and future expansion of provision can be better planned and delivered.
	C) Community and social issues? It will undermine the urban regeneration focus of Policy RDF1 and change the longstanding role and character of many smaller settlements if delivery took place in accordance with this redistribution.
	D) Environment? It will undermine the urban regeneration focus of Policy RDF1 and change the longstanding role and character of many smaller settlements if delivery took place in accordance with this redistribution.
	E) Economy? The redistribution of housing will redistribute jobs to some extent, but also increase commuting – both of which are contrary to the main need to focus new employment and matching

Organisation:	3. In taking forward this option, what are the implications for:
	housing growth in the main towns and cities where existing facilities and needs are concentrated.
Macclesfield Borough Council	<p>A) Delivery: Suggesting an urban / rural redistribution based on sub-regions does not enable all districts to assess the potential impact on their housing figures. Macclesfield is a relatively rural district within a very urban sub-region. It is unclear whether this proposed redistribution would lead to a higher figure in Macclesfield based on its rural nature, or a lower figure based on its inclusion in the Manchester City Region.</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? Increasing general market housing provision in rural areas would not necessarily address rural housing problems but more likely become a 'commuting policy'. It is likely to lead to further unsustainable commuting patterns into urban areas and increase pressure on the transport infrastructure. Removing the focus of development away from urban areas may undermine the significant regeneration efforts in these areas, especially with the prospect of a weakened economy. It is also noted that there is no mention of the sustainability of locations for rural housing. If there is to be an increase in the level of housing in rural areas, this should be in sustainable locations with good access to shops, services and public transport.</p> <p>D) Environment? -</p> <p>E) Economy? -</p>
Merseyside Policy Unit	<p>A) Delivery: -</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? -</p> <p>E) Economy? We consider that adopting this option, by shifting the balance of housing provision away from the major conurbations, could undermine regeneration efforts - especially housing-related - in those areas.</p>
Satnam Planning Services Ltd	<p>A) Delivery: Insufficient levels of housing in the urban centres. Inappropriate balance of housing provision between urban and rural areas.</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p>

Organisation:	3. In taking forward this option, what are the implications for:
	D) Environment? -
	E) Economy? -
Liverpool City Council	A) Delivery: There could be major implications as it would need major new infrastructure provision.
	B) Infrastructure provision? See above
	C) Community and social issues? A lower figure for Liverpool and its city region would seriously undermine population stabilisation objectives, undermining regeneration programmes including that of the Newheartlands Pathfinder. A reduced figure for LCR will lead to the worsening of housing affordability for many parts of the community
	D) Environment? Liverpool and its city region can accommodate considerable amounts of new housing on brownfield land and in sustainable locations. Not fully utilising this "offer" would mean adverse environmental impacts elsewhere in the region, including on the Green Belt.
	E) Economy? Liverpool and its City Region is recognised as a key economic driver for the North West. To continue this growth and maximise the contribution to the regional economy, an appropriate level of housing provision will be required (which has been identified in the 2007 Liverpool City Region Housing Strategy) This Option would seriously undermine this and would not see growth in the regional economy.
Highways Agency	A) Delivery: Supporting infrastructure (in its widest sense) needs to be delivered in a timely manner in order to ensure levels of housing provision accord with over-arching sustainability aims of RSS and other policy objectives relating to economic growth and managing travel demand (in particular the number and length of car-based commuting trips).
	B) Infrastructure provision? An assessment of the infrastructure requirements to support this level of housing provision is needed as part of this review. To help decision making, there would be benefit in a combined assessment of stress levels on the road and rail networks. Necessary improvements need to be prioritised and supported within the RFA
	C) Community and social issues? An assessment of existing key services (education, health, employment and retail) should be undertaken to evaluate the sustainability of housing locations and identify additional services that maybe required to minimise the number and length of car-based trips.

Organisation:	3. In taking forward this option, what are the implications for:
	<p>D) Environment? Additional or lengthier transport trips arising from this level of housing provision may have implications for noise levels, air quality and environmental resources - such as a landscape and bio-diversity.</p> <p>E) Economy? Growing congestion on the road network arising from an increasing number and length of car-based commuting trips may frustrate achievement of economic growth forecasts. The opportunity to secure funds from the Community Infrastructure Levy and Community Infrastructure Fund should be explored.</p>
Lambert Smith Hampton	<p>A) Delivery: Demand would always outstrip supply which would lead to an increase in house prices. The housing market would have to be changed to provide phasing. A boom and bust cycle may still be encouraged if the housing numbers are retained at the same level as the emerging RSS housing provision.</p> <p>B) Infrastructure provision? Infrastructure will not be provided in terms of improvements to the living environment of the existing communities. It will not encourage investment into the area.</p> <p>C) Community and social issues? Flexibility in the housing market would be limited, as would the opportunity to provide affordable housing. An ageing population may also be a by product as investment would not be encouraged.</p> <p>D) Environment? The revised spatial distribution of housing would provide a more appropriate level of development and reduce the potential of skewed investment in inappropriate locations within the City Regions of Manchester and Liverpool.</p> <p>E) Economy? Investment would be more evenly distributed across the region.</p>
West Lancashire District Council	<p>A) Delivery: A lesser number of dwellings in West Lancashire would be easier to deliver. The market may have difficulty delivering due to the poor housing market situation and the lack of skills in the industry to provide this level of housing after many years of constraint.</p> <p>B) Infrastructure provision? Potentially less impact – but difficult to say until information received from stakeholders and until we know how this figure would translate to a district level.</p> <p>C) Community and social issues? -</p> <p>D) Environment? -</p> <p>E) Economy? -</p>

Organisation:	3. In taking forward this option, what are the implications for:
LDNPA	A) Delivery: Land acquisition Build costs Grant per unit not sufficient from Housing Corp. etc
	B) Infrastructure provision? Implications on highways, waste, sewerage systems, electricity, gas, water provision, flooding, etc. Resource intensive not necessarily supported by relevant Government funding or aspiration.
	C) Community and social issues? Increase house building in rural areas is to be supported in principle as it will help to support and maintain vibrant communities.
	D) Environment? We should not support new build at all costs, especially not at the expense of damaging our fragile environment. What are the results of the SA/SEA/AA? We should be encouraging a more effective and efficient way of utilising existing housing stock. the government must appreciate that we cannot build our way out of this housing problem.
	E) Economy? Retaining local people to support local businesses is supported.
GVA Grimley (<i>on behalf of Goodman</i>)	A) Delivery: Sufficient housing numbers for the region will not be delivered if this option is pursued. In addition there may be a mismatch of supply and demand if rural areas are a focus for development.
	B) Infrastructure provision? If RSS does not seek to provide the maximum recommended housing numbers from the outset then infrastructure levels will not be sufficient to accommodate future growth.
	C) Community and social issues? Community facilities may not be adequately provided for if increased housing numbers are not taken into account. In other circumstances there may be over provision in areas with little demand if rural areas become a focus for new development. Development in rural areas needs to be dealt with on a case by case basis rather than applying a general approach to increase the development of new housing in such areas.
	D) Environment? This approach could lead to unnecessary development in rural areas and significant implications for the environment. Where possible new housing should be focused in existing urban areas.
	E) Economy? This approach could hinder future economic growth or the maintenance of current economic conditions in two ways: 1. Not providing sufficient levels of new housing in existing urban areas. 2. Placing too much emphasis on rural areas where demand is generally lower.
Allerdale Borough	A) Delivery: Whilst higher numbers may be needed to facilitate the delivery of affordable housing, with the current (inadequate) processes for delivery of such, it is considered highly

Organisation:	3. In taking forward this option, what are the implications for:
Council	unlikely that the local housing markets could deliver such numbers which are so substantially higher than trend.
	B) Infrastructure provision? LDFs will address the infrastructure issue but there could be some local problems with delivery of such a scale of development in the timescale envisaged.
	C) Community and social issues? As above.
	D) Environment? With few exceptions, the towns of Allerdale and Cumbria have very little brownfield land, and so, the figures proposed here would rely heavily upon the release of greenfield land. There are environmental capacity constraints in some Allerdale towns eg. Cockermouth, which help to render the deliverability of this scale of development dubious in the timescales envisaged.
	E) Economy? Higher housing figures could enable the in-migration required to grow Cumbria's economy and improve its GVA performance, as aspired to in the "Energy Coast" and other economic strategies. However, such a policy can only be justified if the evidence is there that the economic side of the equation will be delivered. Research suggests that economic growth cannot be housing-led but that housing goes hand in hand with economic growth.
Taylor Young Ltd	A) Delivery: In some ways this may be more deliverable as rural locations could be more attractive to developers and the markets less saturated?
	B) Infrastructure provision? Some more rural areas will presumably require a greater investment in infrastructure to support housing growth.
	C) Community and social issues? There may be unrest in rural communities with the revised distribution and loss of green belt in many areas to accommodate this
	D) Environment? This may be less sustainable as developing outside the regional centre will in turn create further journeys to work and for leisure.
	E) Economy? A broader spread of development must be good for the economy as it will hopefully spread the associated employment and service industries.
Upper Eden Community Plan Group	A) Delivery: The current low housing figure encourages LPAs to set higher proportions and lower thresholds for affordable housing in an attempt to meet the affordable housing needs identified through the recent research. However, this approach runs a high risk of failing to deliver both the level of general housing and affordable housing because the release of land for housing, particularly in rural areas will be diminished. The general approach to affordable housing of

Organisation:	3. In taking forward this option, what are the implications for:
	<p>seeking greater and greater contributions from developers has a lower limit on its effectiveness in rural areas than in urban ones. This is due to a number of factors including, the proportion of greenfield land potentially available, landowners historical ownership of land, local sentiment, long term (multi generational) development plans. Essentially, the ever increasing burden on landowners in their release of land for housing reduces the overall quantity of land that will come forward.</p>
	<p>B) Infrastructure provision? A reliance on fewer but larger locations for development to provide the allocation of housing in rural areas will put an increased and significant strain on existing infrastructure such as roads, water, and sewage. However, an approach that seeks to distribute a low but locally significant proportion to all communities will ease this burden. Service providers involved in health and welfare recognise the importance of retaining local kinship and informal networks in ensuring at-home delivery is effective.</p>
	<p>C) Community and social issues? A low housing figure together with an exclusive allocation policy will exacerbate the affordability problems of housing in the small rural communities. This will result in increased levels of holiday and second home ownership, an increase in the level of commuting, and an increase in the number of retired people displacing locals in villages. Such events destroy the communities and social networks in small rural communities. Limited allocations for all communities properly restricted through condition and s106 agreements for local people, and those in need as appropriate, will help retain younger people in communities where they have grown up. The sustainability of the communities and the social networks to which they contribute will be retained. The effect of this on health, welfare and cultural requirements can not be underestimated.</p>
	<p>D) Environment? The rural population in sparse areas such as Eden is lower now than at any time in the 19th century, there are many existing buildings that can be effectively reused to provide suitable housing for those in need. The effect of such development will have limited impact on the landscape value of the countryside and small villages, and may in many circumstances improve the landscape. From a climate change point of view, rural locations often provide the best opportunities to provide zero-carbon developments, and renewable energy that can be exported back into the grid.</p>
	<p>E) Economy? The rural economy suffers from a lack of diversity and a lack of critical mass both in terms of market and labour. The current housing allocations will not allow the current population to remain stable, resulting in a greater reliance on seasonal and low paid employment in the tourist industry. A less exclusive allocation policy and an increase in the housing figures</p>

Organisation:	3. In taking forward this option, what are the implications for:
	will allow the population to remain stable in the rural areas, while allowing modest growth in the larger settlements. This should help the economic base for the area. In addition, by providing some limited opportunities for wealth creators to move to rural areas, where significant investment in their personal property can occur, an increase in inward investment in the general economy is more likely.
NW Transport Roundtable	A) Delivery: Delivery is most unlikely.
	B) Infrastructure provision? The Environment Agency expressed serious concerns at the last RSS EIP about infrastructure provision for lower figures than these.
	C) Community and social issues? The community and the social implications of trying to deliver so many houses are enormous. It should not be attempted.
	D) Environment? It would be irresponsible from an environmental perspective to attempt to achieve such high figures.
	E) Economy? The government is mis-guided in believing that providing more houses will bring the costs to buyers down.
Lancaster City Council	A) Delivery: Significant growth leading to green field or urban extension requirements may meet stiff resistance and are not covered in options in the current LDF Core Strategy which has just been found sound.
	B) Infrastructure provision? There is evidence emerging of infrastructure constraints to higher growth which would need to be investigated before growth could be confirmed to be deliverable. Traffic movement around the district constrained.
	C) Community and social issues? Whilst there is consensus about A1.1 growth levels there is likely to be a loss of consensus on higher growth. Issues such as the capacity of local services and jobs to support growth would be raised.
	D) Environment? Significant sensitive environment surrounding the districts urban areas, and those of partner authorities around Morecambe Bay. Growth options limited by areas at risk of flooding identified in Strategic Flood Risk Assessment.
	E) Economy? Current LDF seeks to develop transformational economy based on knowledge and skills. Without sparks of success, further growth cannot easily be supported by higher employment sufficient to enable homes to be bought.

Organisation:	3. In taking forward this option, what are the implications for:
Cumbria County Council / Cumbria Strategic Partnership	<p>A) Delivery: There might be problems arising from the ability of Cumbria to deliver this level of additional houses, both affordable and open market, due to the current restrictions on Housing Corporation funding arrangements, and the ability of RSL's to deliver significant increases in the levels of affordable housing.</p> <p>However, the upwardly revised annualised housing requirement numbers should increase flexibility to deliver all-types of new housing by enabling the Districts to allocate more available land, and enable cross subsidy for affordable housing on open market housing sites through the use of S106 agreements.</p> <p>It is suggested that as an alternative means to delivering affordable housing, there could be a 'viability' quota of around 20-30% affordable provision, should the overall annual requirement increase to 2,836 units per annum. This would give around 567 affordable units, which equates to 44% of the annual affordable housing need in Cumbria (i.e. 1,299).</p>
	<p>B) Infrastructure provision? Assuming the current proportionate split, there is likely to be implications arising from this 57.9% increase in the rate of housing growth upon local infrastructure provision, especially within (but not exclusively) Allerdale (422 dwellings per year), Carlisle (711 units pa) and SLDC (632 units pa), where the increase could lead to significant additional pressures upon education, highways and transportation, utilities, and provision of social facilities.</p> <p>It is not clear at this stage as to what the impacts might be, and where they maybe most apparent. This aspect requires further detailed consideration outwith the timescales of this consultation.</p>
	<p>C) Community and social issues? As above</p>
	<p>D) Environment? Within the 3 Districts identified above (but not exclusively), there are likely to be moderate/substantial additional pressures placed upon environmental and infrastructure capacity, especially so in SLDC where much of the District is covered by some form of landscape/natural habitat designation, and limitations on existing infrastructure. Outward growth in Kendal is, for example, particularly difficult by virtue of the surrounding topography, which has some form of landscape designation, and its proximity to the Lake District National Park boundary. There might also be implications for this level of growth outside of Carlisle City and Workington and surrounding settlements as well as within the more rural parts of all the Districts.</p>
	<p>E) Economy? The increased housing provision would be likely to support increased opportunities for people to move into Cumbria to take up employment opportunities, and thereby contribute</p>

Organisation:	3. In taking forward this option, what are the implications for:
	towards an improvement in the skills base and aspiration for potential GVA growth comparable with the remainder of the North West. However, any housing growth must be planned alongside expected economic growth and identified employment needs, and the any inward population growth is likely to significantly increase pressures upon local infrastructure. The policy for local occupancy would be consistent with this objective.
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	A) Delivery: See response to Question A1.1 Point 3 above
	B) Infrastructure provision? 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