



PARTIAL REVIEW OF REGIONAL
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A2.2
June – July 2008

CONSULTATION REPORT

North West Regional Assembly

PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A2.2

A consultation report from

CAG Consultants

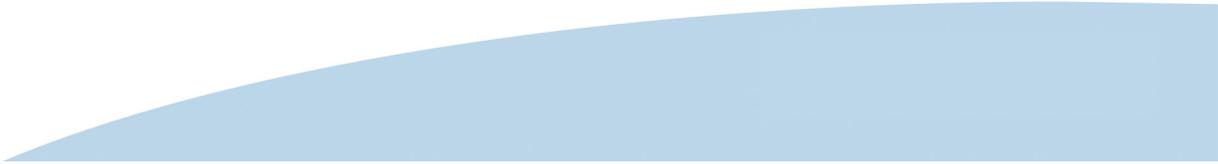
in association with **Concept 4 Creative and Community
Consultants**

April 2008

CAG CONSULTANTS
Gordon House
6 Lissenden Gardens
London NW5 1LX
Tel/fax 020 7482 8882
hq@cagconsult.co.uk
www.cagconsultants.co.uk

for direct enquiries about this report please contact:

Emma Cranidge
Ewood House, Ewood Lane, Todmorden, OL14 7DF
tel 01706 817347 or mob 07879 017617
ec@cagconsult.co.uk



Contents

Introduction to this report

Questionnaire Responses by question



Introduction

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

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

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

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

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

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

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

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



1 Questionnaire Responses

1. Do you agree with Housing Option A2.2?

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

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Northwest Regional Development Agency	In part	We acknowledge the intention behind considering an alternative spatial distribution as part of the options paper, namely to take account of concerns raised by the Affordable Rural Housing Provision and the Commission for Rural Communities as to levels of housing provision in rural areas proposed by Draft RSS. However, we feel that any proposed spatial distribution should be sufficiently flexible to allow both for the accommodation of any successful growth points within the region and any spatial priorities which may emerge from work on the Regional Strategy commissioned by the Regional Strategy Team. Whilst the need to ensure an adequate provision of rural housing is an important objective in itself, equally desirable is ensuring sufficient flexibility in order to accommodate any successful housing growth points. Whilst there may be a tension in achieving both these aims, we feel that the principle of achieving a 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.		
Indigo Planning	In part	Whilst CEG accepts the need to better provide housing in the rural areas, this should not be to the detriment of the main urban areas and the focus on reuse of brownfield sites to deliver sustainable housing and other growth.		
National Housing Federation	Yes	The National Housing Federation in the North is the voice for over 360 not-for-profit, independent housing associations providing affordable homes for almost one and a half million people. For every pound raised to fund non-housing assets; housing associations have contributed a further two pounds to support neighbourhood projects.		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>The Federation is supportive of the Governments target to increase the number of new social rented and affordable homes. This target was based on the Federations response to the Comprehensive Spending Review.</p> <p>In our <i>North West Home Truths</i> publication (November 2007) we highlight the growing affordability problems in the North West. Although the recent financial downturn has resulted in predictions of small decreases in house prices, this will not bring prices in line with earnings, and the increased costs and decreased availability of mortgages mean home ownership is likely to be even less accessible. <i>Home Truths</i> also highlights that housing waiting lists have grown faster in the region than anywhere else in England in the last five years. More recent information from "choice based lettings schemes" in the region, which more accurately demonstrate active demand, highlights continuing and rising demand for affordable housing. This demand is likely to increase in the context of the current housing market. Whilst <i>Home Truths</i> included projections (based on research commissioned from Oxford Economics) of a period of lower house price inflation to 2010, the research also noted after this date a period of rapid acceleration. Although the financial downturn experienced since then makes the timescales on these projections likely to shift, we have commissioned Oxford Economics to update these predictions (publication due September 2008) and early information suggests house prices to increase rapidly again from 2012.</p> <p>Option A2.2 recognises the evidence based projections of the National Housing and Planning Advice Unit and as the figures are now floor rather than ceiling targets, there is potential to exceed these figures when the economic climate improves.</p> <p>The spatial spread takes account of the need for more rural homes. Increased targets for rural homes are essential if we are to address the Affordable Rural Housing Commission's recommendations and address the rural housing crisis. Current indications suggest a house price to income affordability ratio of up to 13.9 in Eden – the supply of affordable housing must be increased to support the sustainability of rural communities and the rural economy.</p>		
Indigo Planning Limited	Yes	<p>Options A2.1 and A2.2 seek to increase the housing provision figures set out in the RSS Proposed Changes (March 2008) to the lower end of the National Housing and Planning Advice Unit's (NHPAU) projections, with the provision of 28,000 dwellings per annum (18% increase). Again the options seek to either retain the current spatial</p>		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		distribution or change it to place more emphasis on provision in rural areas. CEG supports the increase in housing figures as this will go some way to increasing delivery to manage the affordability problems. However, as set out above, the increase would provide only limited flexibility to meet housing needs and would not be sufficient to accommodate housing requirements resulting from successful Growth Point bids (which equate to a 20% increase in housing provision). Whilst CEG accepts the need to better provide housing in the rural areas, this should not be to the detriment of the main urban areas and the focus on reuse of brownfield sites to deliver sustainable housing and other growth		
Home Builders Federation	Yes	In our original submission to the submitted draft RSS, we raised concerns regarding the overemphasis on delivery in the City Regions, in particular Manchester and Liverpool, at the expense of some of the more rural areas. While we cannot comment on specific districts in the city regions or other sub areas in the North West because of the diversity of our members' interests in the regions, we would support the option to revise the spatial distribution to increase levels of provision in rural areas as this represents a more equitable distribution across the region. It is not felt that the relatively small proposed changes included in the revised spatial distribution will significantly affect the important growth of the city regions, which in turn will provide economic growth for the future of the North West. In terms of developing the options on spatial distribution, we would draw attention to the Housing Market Area work that has been carried out as evidence for the RSS partial review. We are supportive of the application of Housing Market Areas as a tool for developing planning policy, although further consultation would be needed into whether the proposed market areas proposed in the Tribal report adequately reflect the situation in practice. Our members would be able to contribute to such work and we welcome any opportunity to do so and engage with you on this issue. There is still clearly much to be done.		
Environment Agency	No	In terms of the quantum of growth, the Environment Agencys comments for option A2.1 apply. However, as for option A1.2, there may also be more or different implications from the revised spatial distribution on the rural environment and infrastructure. 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. These		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		rural specific issues and the significant uplift in housing numbers means potentially a larger question mark exists over the sustainability of this option, particularly compared to A1.2. To help understand if this option can be sustainably progressed, the Environment Agency would want work with the NWRA and others on the implications of any revised spatial focus.		
Bartonwillmore on behalf of Paycause Ltd.	No	Paycause considers the Liverpool City Region is a key area in accommodating growth in the NW 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.		
GONW		As per general comments on rural redistribution. Concerns about the potential for rural redistribution to lead to an undermining of the spatial framework and to unsustainable consequences from dispersed development, poorly served by public transport, would be exacerbated by the increasing numbers of dwellings in rural areas further as per option A3.2.		
Preston City Council	No	This would accommodate growth point requirements but would also lead to pressure to identify rural locations.		
Halton Borough Council	No	The shift towards rural provision (options A1.2, A2.2 and A3.2) would see the balance of housing in the major urban areas – the Liverpool and Manchester City Regions – reduced, in the expectation that providing a greater proportion of housing in the rural areas would help to tackle affordability problems in those areas. This would represent a major shift in the spatial priorities of RSS, and would potentially undermine efforts to revitalise the urban parts of the region.		
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		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		through local assessments of requirements and allocations either at Housing Market Area level or in individual LPAs LDFs.		
Blackpool Council	No	The implications of this redistribution in practise would directly and very markedly conflict with the key spatial priorities fundamental to NWRSS and national planning policy guidance, and would have huge implications for the patterns of delivery of new housing development against Policy RDF1. This scale of change is not justified, nor could it ever be delivered in appropriate locations. The redistribution seems a huge over-reaction to the concerns raised by the Affordable Rural Housing Commission and the Council for Rural Communities. Other rural lobbies and the communities in these areas may have different views – and these changes seem to go to the very heart of NWRSS. Against the A1.1 figures, these A2.2 figures represent a slight increase from the figures for the main Manchester and Liverpool City Regions, but are not overly different. However, their delivery would be undermined by the major re-focusing of increased provision in the rural areas. The figure for the Central Lancashire City Region represents an increase of 59%. In Cumbria and North Lancashire it represents a huge rise of over 90% in total numbers. This scale of change would have an extreme impact on the ground, implying major development and expansion - whilst at the same time undermining growth and sustainable development RDF priorities in the main urban areas		
Local resident	No	Policy RDF1 prioritises growth lastly to the rural areas (including all of Eden). The redistribution option and other higher numbers options and their similar rural redistributions are totally unrealistic, and it is hard to think have been properly thought out. Such a redistribution directly conflicts with the key spatial priorities fundamental to NWRSS, is unjustified, and could never be delivered. The redistribution seems to be based on affordable housing concerns which are now across much of the country, and to population forecasts based on a continuation of unsustainable further inward local in-migration, rather than meeting local needs. The impact in rural locations is extreme. In Cumbria and North Lancashire, the increase from 9.5% to 15% represents a huge rise of over 60% in total numbers. This would have an extreme impact on many rural areas.. In districts like Eden this will lead to what can only be described as ridiculous levels of planned growth.		
Lancashire County	In part	This option would be able to accommodate the levels of growth envisaged in the		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Council		submitted Central Lancashire, Blackpool Growth Point Expression of Interest. An increase in the level of provision in rural areas to address the concerns of the Affordable Rural Housing Commission and the Council for Rural Communities is supported in principle. It is not entirely clear how the sub regional shares in the alternative spatial distribution have been established. Further evidence of how the figures are derived is required. The alternative spatial distribution lacks sensitivity to the needs of individual housing market areas. West Lancashire district is in the Liverpool City Region. Excluding Skelmersdale, West Lancashire is largely a rural district with affordable housing needs. The alternative spatial distribution seeks to give rural areas a greater share of the regional housing provision. The reduced share of the regional housing provision for the Liverpool City Region could mean that the effect in West Lancashire is the opposite of what is intended, ie less opportunity to develop rural housing.		
Cheshire West and Chester (comments represent informal officer views)	No	This option involves a significant increase in the housing requirement of Central Lancs City Region, Cumbria and N Lancs and S Cheshire. There will be pressure for greenfield land release. Could undermine efforts to secure urban regeneration and renewal within the Manchester and Liverpool City Regions. Would result in a mis-match between economic and housing growth in that a greater proportion of housing would be promoted outside those areas with the greatest economic potential.		
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 increasing the provision for both affordable and market housing in rural areas. The potential increase in overall housing figures for the region combined with the potential increase in the proportion of provision for rural areas would lead to excessive and inappropriate development in rural areas. This top-down approach is not needed and conflicts with the rural affordable housing strategy. There was significant doubt that 400 additional dwellings per year could be accommodated within the borough without		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
				<p>incursions into the Green Belt. However, the Council and the Macclesfield Strategic Housing Market Partnership have recently carried out work assessing the potential to accommodate this number. We have recently consulted on a draft Strategic Housing Land Availability Assessment. Whilst not yet finalised, the assessment indicates that that it will be very challenging, but possible to accommodate 400 dwellings per year and the additional backlog due to the backdating of figures to 2003. Recent guidance from Government Office indicates that the backlog would need to be made-up in the first five years, which results in a requirement for 486 net additional dwellings per annum during this period. Until recently, Macclesfield had a restrictive housing policy in place as a result of the Cheshire Structure Plan housing requirements for the Borough. Although significant numbers of permissions were granted under the restrictive policy, the numbers granted were less than would otherwise have been expected. As a result, the bank of outstanding permissions is diminished in size and meeting the backlog in the first five years will be very challenging. In considering the sites that would be required to deliver these housing numbers, the Strategic Housing Land Availability Assessment relies heavily on developing a number of sites that are currently in other uses, including employment sites, retail units, school sites, car parks, hospital land, infill sites and by redevelopment of existing large housing plots to increase the density. It also requires that a significant proportion of new development be for flats and apartments to achieve the numbers required. If market conditions continue to deteriorate, it is likely that this reliance on flats would need to be reduced in order to ensure delivery of new housing. Whilst the SHLAA is currently in draft form, consultation has now ended and the final figures will be published in September. It is important to recognise the constraints to development within Macclesfield Borough. 82% of the land area is covered by Green Belt and National Park designations. The remaining area consists of open countryside beyond the Green Belt where development pressures are significantly reduced, and a number of towns that are all tightly bounded by Green Belt. Furthermore, extensive parts of the Borough (138 sq km) have been designated as Areas of Special County Value for Landscape, there are over 220 sites of nature conservation interest including 3 internationally important Ramsar sites and 13 nationally important SSSIs, and there are significant populations of endangered species such as the Great Crested Newt. There are also further constraints to development within the built environment, with 45 conservation areas and 1,855 listed buildings.</p>

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>Options A2.1 and A3.1 propose two differing levels of increase in housing provision, spread throughout the region based on the existing spatial distribution. Adoption of either of these options would therefore result in a significant increase in the housing provision figures in Macclesfield. Whilst we would not wish to constrain those areas wishing to pursue growth agendas, it is clear that Macclesfield Borough cannot accommodate any increase over the 400 per year without serious consideration of development of Green Belt land. Given that the housing figures could now be seen as minimum figures and are to be regarded as a 'floor' rather than a 'ceiling', continuation of the existing provision figures would still allow additional growth in areas where appropriate. The options paper claims that either continuing the existing level of provision, or increasing the provision to the lower end of the range proposed by the National Housing and Planning Advice Unit may not give sufficient flexibility to accommodate all growth point bids. As the figures are to be regarded as a minimum, there appears to be no ceiling on the level of provision and therefore all growth points could be accommodated by continuing the existing level of provision. Alternatively, an increased overall housing figure for the region could be accommodated by adjusting the spatial distribution based on analysis of the circumstances and ability to deliver increased numbers at district level.</p>		
Haslington Parish Council	No	Increased burden on rural communities to host additional housing.		
Merseyside Policy Unit	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 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.</p>		
Copeland Borough Council	In part	<p>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,</p>		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		2007) and this estimates a requirement for up to 20,825 new dwellings over the period 2007 - 2032. However, if current RSS levels of distribution are maintained there is a danger that general housebuilding rates in the east and north of the County could jeopardise the markets in Copeland and Allerdale and thereby weaken the efforts towards the regeneration of West Cumbria.		
RPS Planning	No	Please see response to Option A2.1: The housing provision for the region as a whole may be more appropriate than the existing RSS. However, the distribution proposed does not appear to relate to the capacity of the sub regions to accommodate these levels of housing provision. It should be noted that the proportion of the regional housing total allocated to Crewe and Nantwich (South Cheshire) was about 2.3% in RPG13. The reduction of the percentage to only 1.97% in the current RSS was not justified and was based upon a strategy to focus a greater proportion of housing into Manchester and Liverpool. We consider therefore that for Crewe and Nantwich a proportion higher than 2% but less than 3% would give rise to a more appropriate level of housing provision of about 700 to 750 dwellings per annum		
Satnam Planning Services Ltd	No	This option will lead to insufficient housing and lead to high levels of commuting.		
Carlisle City Council	In part	Whilst Option A2.1 was seen as the minimum growth appropriate it is difficult to determine what the upper level would be and how this can be accommodated within any environmental concerns. It is recognised that if the NHPAU advice is taken as the basis for RSS review then some level of redistribution towards more rural areas would be required however, it is difficult to assess whether a 15% level for Cumbria and North Lancs is correct.		
Lambert Smith Hampton	In part	Whilst we generally support the increase in housing provision figures, the figures should be tested. The advice to Government from the NHPAU is that the supply range should be tested at the regional level. The regional figures are not based on testing, but rather are taking the figures set out by the NHPAU as the requirement, with no further justification. In order to comment fully on a revision of district housing figures each LPA in the north west will need to supply up-to-date accurate information on their housing land availability. However, not all LPAs are at the same stages of the LDF and therefore may not have up-to-date information. We support the option to review the		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		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 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.		
Highways Agency	Don't know	There is a need to see evidence of the impact of this level of housing provision on the region's infrastructure (including road, rail and utilities) undertaken as part of this review, in order to assess the sustainability and realism of such a level of housing provision and soundness of the plan. The transport dimension of housing provision must be assessed to support and inform decisions about levels of housing provision and location.		
West Lancashire District Council	Yes	Extrapolated figure for West Lancashire could be around 322 units a year. Housing figure could possibly be met although on higher side of acceptable and difficult to comment much further in absence of SHLAA and knowing the exact figure for West Lancashire.		
Allerdale Borough Council	No	This scale of housing development would necessitate the virtual doubling of building rates in Allerdale. This is considered to be undeliverable in the context of the local housing market and local infrastructure. It would also be likely to cause unacceptable environmental impact. Whilst this would give more flexibility in delivering affordable housing the environmental cost would be too high.		
Emerson Group	No	The bottom end of the range of housing supply will be and underprovision which should not be planned for.		
LDNPA	No	This will be too onerous. It sets a delivery target for the LDNP of 115 pa which is a significant increase. We do not wish to be a hostage to fortune signing up to something which we have little chance of achieving. The provisions of the draft Housing Planning Delivery Grant could mean that this target has serious implications for our Development Control teams ability to ensure the housing to be provided in the LDNP is of a scale and		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		type appropriate to meet the identified need, whilst taking into consideration other planning policies which address location and style. Whilst historic completions rate for the LDNP for the past 5 years (2002-2007) is on average 136 pa, a number of these are historic permission which are unfettered. New policy dictates that all new housing development must contribute towards meeting the identified need of the locality secured through S106 or local occupation conditions. As a consequence numbers will significantly decrease over the next few years to reflect that. In 2007/08 we approved 28 new units of housing.		
GVA Grimley (on behalf of Goodman)	No	Support the idea of increasing housing numbers, however disagree with the approach to focus new development in rural areas as this may not be the optimum way to meet demand.		
Taylor Young Ltd	Yes	The target figure appears more realistic and spatial distribution more effective to enable growth of the region as a whole.		
Wirral MBC	Yes	Wirral is likely to be able to contribute to a slight increase in provision (of approximately 7%) over the Proposed Changes figure of 500 pa but this will rely on a contribution from the Liverpool/Wirral Growth Point at Wirral Waters.		
Pendle Borough Council	Yes	This option would significantly increase the annual housing provision figure for Pendle and this would generally be supported. 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 just slightly lower than the figure proposed in this option. However, this option provides the 'closest fit' figure to the SHMA and is therefore supported as it would be inline with, and can be justified by the local evidence base. The annual figure for Pendle under this option (calculated as 282 on the basis of the current percentage split between authorities in the Central Lancashire City Region) is slightly higher than the current average annual build rate within the borough which stands at 270 (over the last 5 years). However, it should 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		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		indicates that Pendle could accommodate the level of housing building proposed in this option.		
Congleton Borough Council	Don't know	It is suggested that further consideration would need to be given to the effect of the proposed options on both Congleton Borough and the wider Cheshire East Authority. To ensure that an appropriate balance is provided which would allow the Borough to: <ul style="list-style-type: none"> · address the needs of the rural areas; · meet the demands for affordable housing; · ensure that future housing development, as far as possible, meets the principles of sustainable development; · develop within its social and environmental capacity; and · ensure that the development of the Borough does not prejudice development within the housing regeneration areas in the wider area. It is also suggested that other policies specifically targeted at delivering affordable housing schemes in rural areas may be more appropriate and effective than simply increasing the provision for both affordable and market housing in rural areas, in addressing the affordability issues within the Borough.		
Cheshire East Council	No	As in option A1.2 it is not considered appropriate to increase the level of housebuilding in rural areas. When combined with an overall increase in provision, this could lead to excessive and inappropriate development in rural areas.		
Town and Country Planning Association	Yes	The TCPA supported the Government's proposed changes to remove the cap on maximum housing provision. The growing population and increasing attractiveness of living, working and playing in the North West will need to be accommodated in the urban areas. But greater consideration and provisions also in the urban-rural fringes and rural areas where growth will complement existing community, economic and environmental aspirations within the wider city-regions framework and appreciating the growing importance of networked settlement patterns. Therefore the TCPA supports the higher housing provision as realistic, practical and achievable to accommodate for housing growth in areas where is required, whether the conurbations or more rural service centres. The TCPA believes this is the most appropriate and practical option to addressing the housing and growth issues in the North West region. The TCPA strongly advocate an approach which recognises the benefits of choices available to planning authorities and the development industry of a portfolio of sustainable and locally-responsive growth options*. There would be a strong case as a result of the new policy environment established by PPS3 for the region to consider the potential contribution		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>new settlements might make amongst other solutions to housing growth. As part of the partial review into accommodating growth, the TCPA believes it is important to address the underlying housing needs, demands and opportunities whichever strategic growth approach is taken, and the potential economies of scale required to support sustainable economic prosperity. This can be best applied at the sub-regional scale while underpinned by an over-arching regional growth concept and objectives. The TCPA believes that past planning policies have prevented the inclusion of consideration of new settlements (amongst the other settlement pattern options) that RSS are required to consider by paragraph 37 of PPS3. Accommodating growth through sustainable new settlements, including eco-towns, has the potential to benefit and strengthen the prosperity of the area*. There may be opportunities currently on brownfield sites in strategic urban-rural fringe (within housing market renewal areas) or rural areas close to Key and Local Service Centres or city regions such as the Liverpool City Region. In these circumstances new settlements might be preferable to sprawling extensions that would risk the coalescence of existing distinct communities. The additionalities of new settlements in appropriate locations can benefit the environment in terms of making the best use of existing resources through comprehensive rather than piece-meal planning and building, building the appropriate number of high quality of new housing currently lacking in the region (according to CABE*), meeting over expectations of the area's affordable housing needs, and contributing to efforts to address climate change through adaptation measures and renewable and decentralised energy planning (see TCPA worksheets*).</p>		
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 A2.2 that the figure of 4,200 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). Assuming that the proportionate split of the Proposed Changes to RSS</p>		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>remains unchanged, Option A2.2 would, in effect, increase the annualised housing requirement from 1,796 dwelling units in Cumbria to 3,436 units per year, which equates to 91.3% (i.e. %x 4,200-2,196 in Option A2.2 Table applied to Proposed Changes Cumbria RSS figures).</p> <p>If this were to be distributed amongst the districts based on the current Proposed Changes to RSS proportions, this would result in the following annualised housing requirements: Allerdale - 511; Barrow - 287; Copeland - 440; Eden - 457; SLDC - 765; LDNPA - 115; and Carlisle - 861 units.</p> <p>Data held by Cumbria County Council shows that previous historic 10-year (1996-2005) average annual rate of dwelling completions in Cumbria were: Allerdale - 222; Barrow - 110; Copeland - 205; Eden - 223; SLDC - 328; LDNPA - 131; and Carlisle - 393 dwelling units.</p> <p>Whilst Option A2.2 would increase flexibility to accommodate affordable housing provision, there are likely to be significant adverse effects upon environmental capacity at this growth rate of 91.3%. There would be significant infrastructure implications in all parts of Cumbria, in particular in West Cumbria, South and East Cumbria and Carlisle, and especially within the rural parts of Cumbria.</p> <p>There is concern that in South Lakeland, for example, the level of new housing identified in the current Proposed Changes to RSS (400 new dwelling units per annum) is near to the environmental capacity of the area to absorb new development.</p> <p>There are also 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 argues for an increase in the level of new housing by 5,500 units over and above the Proposed Changes to RSS by 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. Even with the growth scenarios envisaged in the Energy Coast master plan, it is considered that Option A2.2 may be well beyond deliverability. Yet it has to be acknowledged that this might be where we ought to be in 20 years time.</p> <p>At the same time, it is also important that any new growth in South & East</p>		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>Cumbria should not be at the expense of regeneration efforts made in West Cumbria. Furthermore, housing growth in South and East Cumbria should meet the identified local and affordable housing needs of the area.</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>Cumbria County Council and the District Authorities are currently preparing a County-wide Strategic Housing Market Assessment, which should better indicate appropriate levels of housing growth, taking account future economic aspirations, the evidence of the Housing Needs Survey 2006, as well as open market housing needs. At this stage, it is not clear as to what level of housing growth might be derived by this study, and how this might compare to this option in the Partial Review.</p> <p>A 91.3% increase would therefore have major environmental and infrastructure implications. It is for this reason that it would not be appropriate to maintain the proportionate District split of the current Proposed Changes to RSS within Cumbria, and that a revised level of new housing will best be identified on the evidence of the Cumbria-wide Strategic Housing Market Assessment.</p>		
<i>on behalf of</i> Persimmon Homes	In part	As set out in answers to Question A2.1 above. We agree with the distribution as set out in this section, as set out in our response to Question A1.2 above.		

Organisation:	1. Do you agree with Housing Option A2.2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
(Lancashire) Limited and Prime Resorts Limited.				
Sefton Metropolitan Borough Council	Yes	The initial view is that the mid-range increase is the option that best reflects the City Region's aspirations, as represented in the Growth Point submissions made by Liverpool, Wirral, St Helens and Halton. The adoption of this level of growth would not imply an equal pro-rata distribution between the city region authorities. The consultation document sets out options for the spatial distribution of the additional development which in the Liverpool City Region focus on the Growth Point bid locations and the Housing Market Renewal Pathfinder areas. Clearly there will need to be a review of this option in the light of the outcome of the Growth Point bids which have yet to be announced by the government. More work will need to be done to develop a city region spatial strategy that could accommodate this growth in a sustainable manner.		
Crewe and Nantwich Borough Council	No	As in option A1.2 it is not considered appropriate to increase the level of housebuilding in rural areas. When combined with an overall increase in provision, this could lead to excessive and inappropriate development in rural areas.		

2. 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 21 blank responses.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
National Housing Federation	<p>The Sub-National Economic Review, development of the Homes and Communities Agency, and development of Multi-Area Agreements all bring a changing spatial landscape with an increasing emphasis on Local Authorities strategic role and need to group together.</p> <p>The North West Regional Housing Strategy is currently being reviewed and is likely to emphasise a sub-regional approach.</p> <p>As key delivery agents, it is essential that Housing Associations are given the opportunity to contribute to decision making at a sub-regional and regional level. New structures should include clear representation of the sector.</p> <p>The Federation's paper <i>Protecting households, delivering homes – housing associations proposals on the housing market downturn</i> outlines our initial proposals to Government on the financial downturn.</p>
Environment Agency	Please see the Environment Agency response to question 2 for option A2.1
Bartonwillmore on behalf of Paycause Ltd.	Option not supported
National Trust	Given the likely even greater 'surplus' of allocations at least in the next few years it will be important to have phasing policies in place so that initially development is directed to where it is most needed to meet social, economic and environmental objectives, rather than 'easy' sites being picked off first that are less beneficial.
Blackpool Council	Such a redistribution would require a fundamental review of the spatial priorities and focus of many of the policies throughout NWRSS
Macclesfield Borough Council	<p>Any increase in housing in Macclesfield Borough will have important consequences for other policy areas such as economic growth, transport and the environment. As this is a partial review, increased housing numbers are being considered largely in isolation and there is no scope for reviewing important linked policy areas. Although not the case in every district, Macclesfield's inability to provide increased housing numbers without risks of incursions into the Green Belt is unlikely to be an isolated situation, and other areas may have similar issues. Any blanket increase in housing numbers throughout the region would therefore need to take place with an associated strategic review of Green Belt. Without such a review, it would not be appropriate to take forward options which would require development of Green Belt land to deliver the level of provision proposed.</p>

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
Haslington Parish Council	Need to ensure protection of rural areas in any growth point scenario.
Lambert Smith Hampton	Revise and amend Policy UR7 of the RSS and L4 of the emerging RSS to take account of the increased housing numbers. Include a policy which supports the provision of sufficient rural housing (affordable and market) to address the needs of rural communities. Amend and revise Policy RDF2 of the emerging RSS to support the provision of rural housing in appropriate locations. Revise Policy SD1 of the RSS and Policy RDF1 of the emerging RSS to reflect the revised spatial distribution emphasis.
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.
Allerdale Borough Council	There would need to be significant change to the spatial distribution of development in Cumbria if these figures were to be met. The environmental capacity of certain areas could not assimilate such development scales, which could mean allocating even higher figures to areas where market conditions are adverse.
Emerson Group	Should not be pursued.
GVA Grimley (on behalf of Goodman)	No comments.
Taylor Young Ltd	Employment, education and sustainability seem the key policies that need to be in line. The growth must be supported by jobs, schools and overarching compliance with the sustainability agenda.
Pendle Borough Council	Consideration needs to be given to how this option impacts on the HMR initiative which is operating in parts of the Central Lancashire City Region. Consideration also needs to be given to the impact increased housing figures will have on empty properties.
Town and Country Planning Association	TCPA emphasises the appropriateness of locations will be a fundamental to success in planning for, delivering and creating a legacy of new settlements. Certainly the partial review process should seek to earmark existing identified sites or new sites as potential locations for sustainable new settlements where good quality public transport links exist or would be potentially viable to create or upgrade. Such links can channel economic resources and capital from a successful new settlement back into its peripheral areas. Policy amendments may be required to reflect the spatial implications of bringing forward new settlements for the current spatial objectives, including those listed as spatial priorities. Considering the potential for new settlements should be subject to three sets of criteria: 1) the first set should address whether new settlement patterns and potential strategic locations would meet transport and economic criteria 2) the second set should address the deliverability and demand for a new settlement and the offer it would provide to residents 3) the third set should follow best practice guidelines recommended in a series of TCPA-led eco-towns worksheets produced for

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	<p>planners and promoters. The TCPA holds the view that because of the role of an eco-town in pioneering standards in innovation and experimentation, the Partial Review should provide a further permissive policy allowing these types of new settlement to come forward where appropriate. The approach might be set out as follows: Background context (supporting text): Accommodating growth through sustainable new settlements, such as eco-towns, has the potential to benefit and strengthen the prosperity of the area. There may be opportunities currently on brownfield and/ or greenfield sites in strategic rural areas close to, but not as sprawl extensions leading to coalescence of, Principal Towns, Local Service Centres or city regions. The additionalities of new settlements in appropriate locations can benefit the environment in terms of making the best use of existing resources through comprehensive, rather than piece-meal planning and building, enabling the high quality new housing currently lacking in the region and contributing to efforts to address climate change through adaptation measures and renewable and decentralised energy planning. In each of the sub regions, there is a wide range of living and working opportunities. Most future growth will be accommodated within the existing metropolitan areas through regeneration and renewal, with development outside the current urban area only where environmental, social and economic principles can be met. Some of this development would be accommodated in future growth areas (such as appropriate locations close to major urban and rural centres). The emphasis on the appropriateness of locations will be fundamental to success in planning for, delivering and creating a legacy of new settlements. It should be noted that accommodating any published potential eco-town locations would be subject to integration with the spatial strategy's development principles and spatial priorities, and their locations would be dependent on a number of stringent environmental, economic and accessibility criteria (as suggested in the form of worksheets guidance produced and led by the Town and Country Planning Association and Communities and Local Government, in engagement with all stakeholders). Mock Policy Clause(s): Provision should be made to accommodate sustainable new settlements of no less than 5,000 homes (including exemplar 'eco-towns') on suitable sites within the city regions or adjacent to rural centres where consistent with the policies of the RSS. Determining the suitability of such sites will be subject to engagement with stakeholders, and assessed against stringent social, economic and environmental criteria. Local planning authorities, in preparing their local development frameworks, should seek to explore and allocate potential sites for sustainable new settlements (including exemplar eco-towns) which meet the locational and performance criteria and seek to enhance the sustainability of the area. or In preparing their Core Strategies, local planning authorities should make provision for growth and change through conscious design at the strategic scale which recognises the structure and linkages in established and proposed settlement patterns. Strategies will offer a blend of urban intensification, sustainable urban extension and new settlements that is appropriate to the area. Broad locations for new urbanisation should be indicated, having been chosen carefully balance least possible negative impacts with the need for places to be attractive and successful socially and economically in the long term. In circumstances where the local planning authority can justify innovation to raise the quality and sustainability of comprehensively planned development, a new settlement may be</p>

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	<p>promoted as an eco-town. Such schemes should be large enough at least to support their own secondary school in addition to primary schools and other facilities. They should be designed to minimise carbon footprint and energy consumption, maximise non-car modes of public transport, offer local employment social and cultural facilities, and be very well connected by public transport to other settlements in the cluster. An eco-town should be comprehensively planned by a town development company committed to focus on the delivery of the place over the long term, and should involve local stakeholders in its conception and long term management and maintenance. Current best practice is to be expected with regard to minimising all harmful impacts of the development. The commitment of resources, and connected legal obligations, should be more demanding than in ordinary new settlements, and eco-towns are intended to be exemplary in as many respects as possible. The quality of new housing should also be considered as part of the partial review, in particular relating to requiring all new housing to adhere to minimum housing space standards for both internal and external spaces. The TCPA has conducted an initial scoping research and would be happy to engage the Assembly in sharing this.</p> <p>* TCPA, March 2007, Best Practice in Urban Extensions and New Settlements. A report on emerging good practice, TCPA, September 2002, TCPA Policy Statement: New Towns and Town Extensions *CABE, 2005, Housing audit. Assessing the design quality of new homes in the North East, North West and Yorkshire & Humber * TCPA, March 2008, (1) Design to delivery: eco-towns transport worksheet. (2) Towards sustainable communities: eco-towns community worksheet. (3) Sustainable water management: eco-towns water cycle worksheet. Advice to Promoters and Planners, London, TCPA, www.tcpa.org.uk. Please note that more topics are currently being produced. Contact the TCPA for more information.</p>
Cumbria County Council / Cumbria Strategic Partnership	<p>There are likely to be very significant implications for the spatial distribution and development emphasis given to the Key Service Centres, Local Service Centres and rural areas with Option 2.2 (i.e. Policies RDF1, RDF2), and the Spatial Principles in DP1 as well as WW3 and W5. The Overall Spatial Priorities for Cumbria (Policy CNL1) the Sub-Area Development Priorities (Policy CNL2) and the Spatial Policy for the Lake District would require reconsideration.</p> <p>It is considered highly likely that if the level of development proposed in this scenario were to be implemented, there could be significant problems for those LDFs already at an advanced stage of preparation, as well as those Local Plans recently adopted.</p> <p>It might 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 constraints within South Lakeland. The approach being taken in the preparation of the Cumbria SHMA incorporates an assessment of demographic change and household formation. This is considered to be a critical aspect in determining future housing</p>

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	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.	As set out in answers to Question A2.1 above.

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

The table below shows the verbatim comments received. We have removed 17 blank responses.

Organisation:	3. In taking forward this option, what are the implications for:
Macclesfield BC	<p>A) Delivery: Suggesting an urban / rural redistribution based on sub-regions does not enable all districts to assess the potential impact on their housing figures. Macclesfield is a relatively rural district within a very urban sub-region. It is unclear whether this proposed redistribution would lead to a higher figure in Macclesfield based on its rural nature, or a lower figure based on its inclusion in the Manchester City Region.</p>
	<p>B) Infrastructure provision? Infrastructure issues would also need to be considered in order to increase housing numbers. Involvement of the utility suppliers is required to determine where capacity can be increased and where there are constraints to increasing infrastructure capacity. Road infrastructure schemes would need to be reviewed; in Macclesfield, early delivery of bypass schemes including Alderley Edge, Poynton and the Manchester Airport link road would be crucial to unlocking Green Belt sites for development.</p>
	<p>C) Community and social issues? Increasing general market housing provision in rural areas would not necessarily address rural housing problems but more likely become a 'commuting policy'. It is likely to lead to further unsustainable commuting patterns into urban areas and increase pressure on the transport infrastructure. Removing the focus of development away from urban areas may undermine the significant regeneration efforts in these areas, especially with the prospect of a weakened economy. It is also noted that there is no mention of the sustainability of locations for rural housing. If there is to be an increase in the level of housing in rural areas, this should be in sustainable locations with good access to shops, services and public transport.</p>
	<p>D) Environment? The draft SHLAA indicates that increasing the level of housing provision in Macclesfield is likely to require incursions into the Green Belt.</p>
	<p>E) Economy? Further increases in housing, combined with the further losses of local employment facilities may lead to more unsustainable patterns of commuting and further pressures on the local and regional transport network.</p>
Indigo Planning Limited	<p>A) Delivery: Whilst CEG accepts the need to better provide housing in the rural areas, this should not be to the detriment of the main urban areas and the focus on reuse of brownfield sites to deliver sustainable housing and other growth.</p>
	<p>B) Infrastructure provision? -</p>

Organisation:	3. In taking forward this option, what are the implications for:
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Environment Agency	<p>A) Delivery: If this option is to go forward, the Environment Agency is keen to work with the Regional Assembly to help understand the delivery issues. For example:</p> <ul style="list-style-type: none"> • Are there no implications on capacity and/or the current policy framework to manage the impacts of the homes and therefore no implications for delivery? • Are there implications on capacity and/or the current policy framework to manage the impacts of the homes? Does this potentially affect the ability to deliver either the physical numbers of properties overall, limit delivery in certain locations or impact on delivery timescales (overall or in certain locations)? <p>If investigations suggest the latter is the case, we also need to understand if:</p> <ol style="list-style-type: none"> a. Housing growth beyond a certain level and/or in a certain location can't be sustainably accommodated at all until changes to wider policy have occurred. b. Changes to the wider policy framework will be required but there is some headroom before capacity issues occur. This would potentially allow the rates in this option to be delivered in the short term until the first opportunity to revise the entire policy framework occurs (i.e. through the Single Integrated Regional Strategy). <p>The Environment Agency will welcome the opportunity to help develop this understanding.</p> <p>B) Infrastructure provision? As has already been stated, the impact from 416,000 of these new homes has been looked at in terms of its impact on certain elements of infrastructure (water and waste water in particular). However, a rate of 28,000 per annum will mean these numbers are delivered more quickly. Infrastructure capacity problems may therefore emerge if this rate of growth outstrips the speed at which any new capacity can be delivered. The implications of this on other policies within RSS which are not being reviewed should be considered. We already have quite strong policy requirements around planning growth and infrastructure together. This includes the need to ensure capacity exists before and not after development and phasing of growth to allow any new capacity to be delivered in time. The impacts of the additional homes will need to be carefully considered in relation to their infrastructure requirements and the effects of these policies. This could potentially impact on the ultimate amount of growth achievable or how it is spread, both spatially and temporally. Please note this links back to the Environment</p>

Organisation:	3. In taking forward this option, what are the implications for:
	Agency's response to questions 2 and 3A.
	C) Community and social issues? NC
	D) Environment? s previously stated, the Environment Agency felt that the level of growth proposed under options A1.1 and A1.2 (rural distribution issues aside) could probably be accommodated within environmental capacity until 2021. However, the 161,775 homes proposed from this point until 2032 under options A1.1 and A1.2 would present challenges and pressures on the environment. We feel that the uplift in proposed housing numbers that option A2.1 represents needs consideration in terms of its impacts as it is a significant increase over options A.1.1 and 1.2. Additionally, if delivered on the ground, it would see approximately 5,000 more homes built per annum. The extra quantum and faster delivery of growth will place additional pressures on the regions environment. Currently the environmental impacts of this option has not been tested. Until this has occurred it is not yet possible to conclude it is either environmentally sustainable or achievable within limits. This work needs to be undertaken as a matter of urgency and the Environment Agency looks forward to contributing to this.
	E) Economy? NC
Bartonwillmore (<i>on behalf of Paycause Ltd</i>)	A) Delivery: Paycause considers the Liverpool City Region is a key area in accommodating growth in hte NW 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 ther 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 toa more unsustainable pattern of development. It would be more appropriate to concentrate on "higher order" settlements such as Chester whose hinterland could accommodate rurther growth that is deliverable
	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 an even greater constraint, and

Organisation:	3. In taking forward this option, what are the implications for:
	more expensive issue to resolve, in more remote locations.
	C) Community and social issues? No additional comments.
	D) Environment? Potentially there will be even 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 hugely increase commuting – contrary to the main need to focus new employment and matching housing growth in the main towns and cities where existing facilities and needs are concentrated.
Individual	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? Eden's main town of Penrith may have moderate capacity for some further growth, but it has taken a few hundred years of history to take Penrith to where it is today as a town of 15,000 people. The redistribution figures imply that all of a sudden, in one plan period, it should then expand by 60%. The higher A2.2 and A3.2 options imply it should double in size, along with similar massive expansion in all Eden's sizeable settlements (the second biggest Appleby, currently having only 2,900 residents). This, in technical terms, is mad, and implies a

Organisation:	3. In taking forward this option, what are the implications for:
	small town and villages which in other locations (even without the special landscape qualities and designated status that are so much to the fore in Eden) would be dismissed as totally inappropriate for growth. Some sanity and realistic analysis of the sustainability of what is being proposed needs to be returned to the NRWSS process.
	D) Environment? -
	E) Economy? -
Haslington Parish Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? Need to ensure existing community facilities are not swamped by growth points.
	E) Economy? -
Merseyside Policy Unit	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? -
	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.
Lambert Smith Hampton	A) Delivery: Unable to fully comment on the deliverability of increased housing provision figures until they have been fully tested and the Housing Land Availability Assessments have been carried out throughout the region.
	B) Infrastructure provision? An increased requirement for additional housing would lead to an opportunity for an improvement in the existing infrastructure as new developments are brought forward in both the city regions and other areas within the region including the rural areas.
	C) Community and social issues? An increased housing provision will improve the opportunity to provide a wider choice of housing, high quality housing, mixed communities particularly in terms

Organisation:	3. In taking forward this option, what are the implications for:
	of tenure and price and a mix of different households, such as families, single persons and older people. The revised spatial mix will widen the choice of housing throughout the region.
	D) Environment? This option would support the regeneration of brownfield sites across the region and improve the quality of the housing stock. It would also reduce the potential of skewed investment within the city regions of Manchester and Liverpool.
	E) Economy? Investment would be encouraged in to the region as a whole and would be more evenly distributed.
Highways Agency	A) Delivery: Supporting infrastructure (in its widest sense) needs to be delivered in a timely manner in order to support delivery of housing provision and 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.
	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 landscape and bio-diversity.
	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.
West Lancashire District Council	A) Delivery: The market would 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.
	B) Infrastructure provision? Unknown – see previous comment

Organisation:	3. In taking forward this option, what are the implications for:
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Allerdale Borough Council	A) Delivery: As above
	B) Infrastructure provision? There would be likely to be serious infrastructure problems in certain Service Centres.
	C) Community and social issues? As above
	D) Environment? This scale of development would exceed the environmental capacity of many areas.
	E) Economy? Whilst this scale of growth would allow our LDF to encompass even the most optimistic scenario in local economic strategies we know that economic growth cannot be housing-led but must go hand in hand with real growth in employment opportunities.
Emerson Group	A) Delivery: Will be delay in timescale because of state of the economy but capable of being met in due course.
	B) Infrastructure provision? Will have to be re-appraised to take account of increased households.
	C) Community and social issues? See B) above
	D) Environment? Likely to benefit initially from increased use of brownfield sites.
	E) Economy? Need to adjust to increases in households.
LDNPA	A) Delivery: land acquisition build costs grant per unit etc
	B) Infrastructure provision? Implications on highways, waste, sewerage systems etc
	C) Community and social issues? Increase in rural housing provision is supported in principle
	D) Environment? New development needs to respect the environment. This is not simply a visual concept but the capacity of the environment to accommodate additional new development. Housing development must be considered alongside the development aspirations for other issues such as employment to ensure development per se which is evidenced by local need is not

Organisation:	3. In taking forward this option, what are the implications for:
	compromised by an unsubstantiated regional housing figure.
	E) Economy? The retention of a local workforce is supported in principle.
GVA Grimley (<i>on behalf of Goodman</i>)	A) Delivery: See previous response to Option A1.2
	B) Infrastructure provision? See previous response to Option A1.2
	C) Community and social issues? See previous response to Option A1.2
	D) Environment? See previous response to Option A1.2
	E) Economy? See previous response to Option A1.2
Taylor Young Ltd	A) Delivery: This enables any successful growth point (eg Chester) to accodate significant development
	B) Infrastructure provision? Once again, spreading the growth around the region spreads the burden on exisitng infrastructure and increases the chances that this will need to be invested in further
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Wirral MBC	A) Delivery: This will rely on a contribution from the Liverpool/Wirral Growth Point
	B) Infrastructure provision? This will rely on a contribution from the Liverpool/Wirral Growth Point
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Pendle Borough Council	A) Delivery: The Strategic Housing Land Availability Assessment indicates that there is land available over the next 15 years to provide 3,359 dwellings. This indicates that there is a stock of land available to deliver part of the requirement over the first 15 years. Further land is likely to become available over the plan period which will ensure that the requirement can be delivered. It is acknowledged that this increased figure could impact on the Housing Market Renewal areas

Organisation:	3. In taking forward this option, what are the implications for:
	within the Borough. The release of land would need to be carefully managed as to not exacerbate the problem of vacant properties. The SHMA identifies that it is type of housing that needs careful consideration as there is a current oversupply of terrace properties. The increase in housing numbers in this option will allow for the housing needs in rural areas to be addressed as well as providing the housing required in the urban areas of the borough.
	B) Infrastructure provision? This level of housing provision might require significant infrastructure improvement in both urban and rural areas.
	C) Community and social issues? This level of housing provision might require an increase of community facilities e.g. schools, healthcare etc.
	D) Environment? Higher levels of house building may require the use of some greenfield sites to meet the provision figures. This will invariably change the landscape in Pendle.
	E) Economy? -
Town and Country Planning Association	A) Delivery: See previous comments. and also reference to TCPA worksheet on community development which called for establishment of focused delivery bodies such as community trusts.
	B) Infrastructure provision? The importance of considering the impacts of the Community Infrastructure Levy and current section 106 arrangements.
	C) Community and social issues? Taking forward one successful and fully supported eco-town in the South Cheshire sub-region can provide more than 24% of the area's housing provision to 2032, including significant contribution to affordable housing provision, and community infrastructure. If an eco-town is delivered within proximity to conurbation, it would be provide more than 28% of the Central Lancashire's housing needs. These are significant benefits to communities and local economic development. Many of these social and community development concerns are inherently embedded in the eco-towns criteria as produced by TCPA in the form of worksheets for CLG.
	D) Environment? See previous comments, and also reference to TCPA various worksheets for CLG on environmental criteria.
	E) Economy? See previous comments, and also reference to TCPA various worksheets for CLG on local economy and travel criteria.
Cumbria County Council / Cumbria	A) Delivery: As above. The proposed annualised requirements would also be significantly above historic planning

Organisation:	3. In taking forward this option, what are the implications for:
Strategic Partnership	permission and completion trends in Cumbria. It is not clear as to whether developers/house builders and RSLs would be able to respond to this level of development.
	<p>B) Infrastructure provision? There are likely to be major infrastructure implications for the provision of health, community, education, highways and transport, as well as ensuring there are proper links to employment and retail provision.</p> <p>It is not possible to give a definitive answer to this issue within the timescale of this consultation, and would require further work.</p>
	<p>C) Community and social issues? As above</p>
	<p>D) Environment? As stated above, there are likely to be significant implications for environmental capacity, especially within West Cumbria, SLDC, Eden, and Carlisle, which contain large rural hinterlands.</p> <p>In SLDC and Eden, there maybe significant capacity problems, given the rural nature of these areas and existing landscape/natural habitat designation constraints.</p>
	<p>E) Economy? The increased housing provision would be likely to support increased opportunities for people to move into Cumbria to take up employment opportunities, and thereby contribute towards an improvement in the skills base and aspiration for potential GVA growth comparable with the remainder of the North West. The policy for local occupancy would be consistent with this objective.</p> <p>However, any housing growth must be planned alongside expected economic growth and identified employment needs, and take proper account of the impacts upon local infrastructure.</p>
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	<p>A) Delivery: See response to Question A1.1 Point 3 above.</p>
	<p>B) Infrastructure provision? As set out in answers to Question A2.1 above.</p>
	<p>C) Community and social issues? As set out in answers to Question A2.1 above.</p>
	<p>D) Environment? As set out in answers to Question A2.1 above.</p>
	<p>E) Economy? As set out in answers to Question A2.1 above.</p>