



PARTIAL REVIEW OF REGIONAL
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing C2&3
June – July 2008

CONSULTATION REPORT

North West Regional Assembly

PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing C2&3

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.

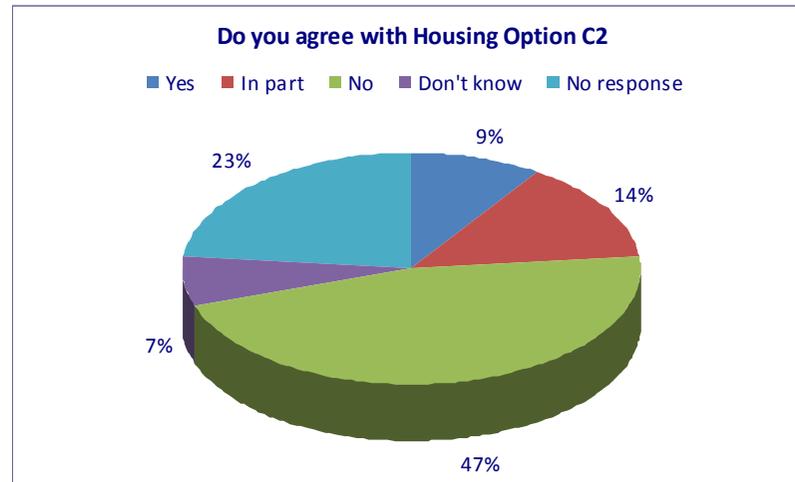
Section One lists the responses received. These responses were received through the online questionnaire, the paper questionnaire, the free phone line and by letter. Workshop information, information on comments outside the questionnaire process, information that was received within the Draft Project Plan stage and the options paper are contained in a separate document.



1. Do you agree with Housing Option C2?

Do you agree with Housing Option C2?	
Yes	4
In part	7
No	22
Don't know	3
No response	10
Total Responses	46

The table below shows the verbatim comments received. We have removed 3 blank responses.



Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Macclesfield Borough Council	No			Macclesfield Borough Council supports the approach set out in option C1 not to give an indication of the level of housing provision in rural areas. This would rely on criteria rather than give targets for all settlements and give local planning authorities more freedom to address rural housing through the Local Development Framework. It is more likely to deliver appropriate levels of housing in rural areas than the setting of targets advocated in options C2 and C3. These options would lead to an increase in market housing in rural areas, with a negotiated proportion of affordable housing within each scheme. The draft Macclesfield Strategic Housing Land Availability Assessment has shown that the vast majority of our available sites are in urban areas, and there are

Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		insufficient sites in rural areas to accommodate general market housing. Sites that would otherwise be considered unsuitable for housing may be able to accommodate small schemes for 100% affordable provision under option C1.		
Indigo Planning Limited	In part	CEG consider that there is a need to set provision levels for rural housing delivery, but that these need to be based on local needs and survey work undertaken through production of the SHLAA.		
The Ramblers Association Manchester and High Peaks Area		Regarding the Consultation on "Homes for the Future", i have received the questions section but we have decided not to respond to the questions posed, but to make only one comment which is: We are extremely concerned to see under Section 1 (Issues to be addressed) that the figures presented in RSS documents are "no longer to be seen as maximum targets or ceilings". This could mean that many areas that we would deem unsuitable , eg greenfield land, could be open to unconstrained housing development. As recreational walkers, we feel that this could impair the quality of our walking experience, as it would be difficult to escape from urbanisation, ie the new housing and associated infrastructure that would accompany it. We feel that abolition of an upper limit completely undermined the role of regional planning and we are opposed to this change.		
Bartonwillmore on behalf of Paycause Ltd	No	Paycause acknowledges that there is a need to deliver all types of housing, including market and "affordable". Our clients believe that having an overall "target" could actually undermine the delivery of housing. Paycause believes that the NW Region housing market is very diverse and as such the delivery of affordable housing should be based on local housing market circumstances.		

Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		The RSS should provide a flexible framework as is the case of current policy. The delivery of the amount/proportion and location of affordable housing should therefore be based on local circumstances and specific robust up to date evidence of local need.		
Countryside Properties	Yes	Option 1 would provide a specific number of dwellings that must be delivered, which may prove to be too rigid to reflect changes in housing markets and rates of housing delivery over time. Option 2 should therefore be pursued.		
GONW		In relation to provision in rural areas it is not clear whether the figures are for affordable housing only or all types of rural housing. The comments above about rural housing redistribution apply. Whilst there is a need to address the issue of rural sustainable communities it is not clear what the purpose of this approach is and how it will fit with other RSS policies including RDF2. This is particularly relevant in the case of option C3 where there could be conflicts with DP policies such as accessibility by public transport in DP5.		
Preston City Council	No	Both this option and C3 impinge on local planning authorities' ability to determine the spatial vision for their area and therefore on their ability to produce Core Strategy where this level of detail is more appropriate. Therefore, the only option that can realistically be supported is C1.		
National Trust	Yes	It is reasonable to set a target that relates to identified needs.		
South Lakeland District Council Development Plans Team		We support option C1: Give no indication of the level of housing provision in rural areas South Lakeland is a 'rural' district, but also contains two larger towns /		

Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>service centres in Kendal and Ulverston. The option paper makes reference to the ONS Rural and Urban Area classification (ONS, 2004). Based on these classifications the towns of Kendal and Ulverston would be classified as urban areas. Under option C2 the RSS would give a figure for the level of provision to be made in rural settlements of less than 10,000 population, and option C3 a more detailed split including a separate target for settlements of less than 3000. By inference, these regional targets will be achieved if all authorities implement the split. However, if we were to apply these targets to our district, it would effectively dictate our spatial strategy (ie how much development should be in the two principal service centres of Kendal and Ulverston which have a population over 10000). Our understanding is that it remains the remit of the Core Strategy to make these decisions, underpinned by public participation. Rather than a rural housing target, it is felt that time would be better served providing some direction regarding second homes. Second homes is a major issue in rural areas such as South Lakeland and given that this appears to have been largely overlooked by the RSS, it is disappointing that the options do not consider this.</p>		
Lancashire County Council	No	Option C3 is preferred.		
Cheshire West and Chester (comments represent informal officer views)	No	<ul style="list-style-type: none"> It is difficult to see on what basis a figure could be set that would be applicable across the region. This is a matter for LDFs. The RSS could certainly flag up this issue and ask LPAs to give it proper consideration preparing DPDs, particularly Core Strategies. 		
Manchester Disabled People's Access Group	In part	Important to support affordable housing in areas where land value and housing value has risen beyond the reach		

Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		of local people. Also ensure that there is sufficient accessible housing/accommodation for disabled and older people in rural communities, including the requirements of particular communities such as gypsies and travellers.		
Haslington Parish Council	No	Do nothing - leads to uncertainty, need to work to a target, need a limit beyond which no more is allowed.		
Merseyside Policy Unit	No	We support Option C1, which would allow those districts which do have significant rural housing to guide development in their rural areas without RSS setting housing requirements.		
Copeland Borough Council	No	It is considered that a bottom-up approach utilising the local Cumbria Strategic Housing Market Assessment to derive a local Cumbria rural requirement would be a more sound evidence base to implement at a local level. The top-down approach in this option is not considered appropriate to local circumstances.		
Shelter	Don't know	No comment on figures for level of provision to be made. However, it is vital that within the figures for affordable housing a target for social rented housing in rural areas also included.		
Satnam Planning Services Ltd	Yes	Some measure of affordability provision must be included in the RSSPR, testing of this figure is welcomed.		
Carlisle City Council	In part	There will as a matter of course inevitably be the need to provide some housing for rural areas and this will form part of the overall RSS requirement for housing however it is difficult to assess how 11,000 at a regional level translates to each rural area. This should be determined locally to deal with local needs but if done as part of the review this could be aggregated into the RSS figures.		

Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Lambert Smith Hampton	No			Option C2 is going beyond the role of strategic planning. It is the role of LAs to decide which are the most appropriate rural settlements for increased housing provision. Some settlements have more facilities than others, and this is not always dependent on the population levels of that settlement. Where settlements have more facilities it is more appropriate to locate increased growth here than in other settlements. To provide a figure for all settlements of <10,000 at a strategic level may have sustainability issues conflicting with national guidance set out in PPS1 and PPS3. The LPAs are better placed to ensure that increased rural housing provision is provided in the most sustainable settlements.
West Lancashire District Council	No			It is impossible to make a judgement at this point in time without knowing the results of the SHLAA and the effect upon rural settlements in the District. This issue should be left to Core Strategies and Site Allocations DPDs and housing need needs to be properly assessed.
Ribble Valley Borough Council	No			RVBC Consider that targets for affordable housing should be established at the local level
Allerdale Borough Council	No			To use a population threshold of 10K pop. is arbitrary and not appropriate. We are talking here about overall housing provision. Some KSCs have less than 10K pop. This option seems to be driven purely by the stated figure for affordable housing being tied to settlements of 10K pop., levels of affordable need must inform the local split but should be derived from bottom up survey not top down prescription. It would be more useful to us for RSS to give an indicative proportional split between KSCs and LSCs rather than an absolute number in settlements above an absolute size. This should be

Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		indicative in order to give authorities some discretion to vary the proportions if local Housing Market Assessments indicate that such are justified.		
Emerson Group	In part	If a target figure is to be built into the Review then the general level should be stated and, probably the Housing Market Area distribution given. Thereafter the LDD's can provide the more detailed locations in terms of settlement expansion.		
LDNPA	No	Policies should reflect the need to sustain communities rather than being a simple numbers game. Housing delivery is much too complicated for that. Figures of this nature should be set locally to reflect local circumstances. LPAs work closely with their local communities and are therefore in a much better position to decide what is needed and where. This should be a 'bottom up' approach and not top down. The RSS still reflects the spirit of PPS3.		
Taylor Young Ltd	In part	I think it is important to set targets to encourage them to be met, although it may be better to set a proportional figure instead		
Wirral MBC	No	Development in rural settlements is too sensitive. It should be for local authorities to decide in consultation with their own local communities through Community Strategies etc., to protect the character of these settlements. Rural housing can still be provided by each district within each district's housing requirement based on local circumstances.		
Upper Eden Community Plan Group	No	We agree with C3		
Pendle Borough Council	No	The amount of new housing to be located in rural areas		

Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
				<p>should be set at a local level, determined and justified by the local evidence base, for example SHMAs. The Burnley and Pendle SHMA sets an affordable housing provision number for the rural areas. Other evidence base work has also been undertaken at a local level to look at the sustainability of rural areas. This work, along with other evidence base documents such as the SHLAA, helps to identify which settlements can accommodate an increase in development. It looks specifically at the existing levels of service provision and where there is potential capacity for further development. This work has been specifically undertaken following the decisions from inspectors on Core Strategies which have failed from not having a robust evidence base in place to show that settlements are sustainable and can accommodate housing growth. The establishment of a rural housing provision figure would have severe implications on the capacity of services and infrastructure. If a rural housing provision figure has to be derived it would be more appropriate to provide an affordable housing figure for rural areas rather than an overall housing figure. However, this would need to be aligned with the figure derived in the SHMA.</p>
Chorley Council	No			<p>This option impinges on the ability of a local planning authority to determine the spatial vision for their area and therefore on their ability to produce a Core Strategy where this level of detail is more appropriate</p>
Congleton Borough Council	Don't know			<p>It is not clear from the detail provided with the option whether this figure for the provision of rural housing will be provided for the region as a whole, or by housing market area or by local authority or whether the figure will be a maximum or minimum figure. It is also not clear</p>

Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
				<p>how the figure will be determined, for example will it purely be based on the Affordable Rural Housing Commission figure of 11,000 units per annum. Again, it is suggested that above approaches rather oversimplify some of the more complex issues that will need to be addressed in relation to development within the rural areas. A figure could be provided but further consideration would need to be given to a number of related issues such as the sustainability of development in these rural areas, the effects on their existing infrastructure (services, amenities, transport etc), the significant differences between the rural areas across the region and the relationship of these developments to the urban areas in close proximity.</p>
Cheshire East Council	No			<p>Option C1 would rely on criteria rather than give targets for all settlements. This will give Local Planning Authorities more freedom to address rural housing through the Local Development Framework. It is more likely to deliver appropriate levels of rural housing in the right locations, than the setting of overall targets as advocated in options 2 and 3. This approach is preferred.</p>
Chester City Council	No			<p>While the importance of housing provision in the rural area is acknowledged, a rigid target for house building for settlements of below 3,000 and between 3,000 and 10,000 people would reduce the flexibility of local authorities to plan for local needs. If a rigid formula is adopted, especially in smaller settlements, the danger is that problems with bringing forward any one site could severely affect the ability of local authorities to deliver growth in those settlements and so meet RSS targets. In addition, while some smaller settlements may have the</p>

Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
				capacity for a higher level of growth – such as available brownfield sites - and benefit from good transport infrastructure, other settlements of a similar size may be less sustainable and have less capacity to accommodate growth. The distribution of housing development within an area should be for local authorities to determine through their Local Development Frameworks, taking into account the views of local communities, local need, capacity and sustainability.
Cumbria County Council / Cumbria Strategic Partnership	No			It is considered that a bottom-up approach, utilising the local Cumbria Strategic Housing Market Assessment to derive a local Cumbria rural requirement would be a more sound evidence base to implement at a local level. The top-down approach in this option is not considered appropriate to local circumstances.
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	In part			We agree in part that there should be a provision made for rural housing. However, we disagree that it should always be located in settlements. There are, in special circumstances (including sustainability and maximising the use of previously developed land), reasons which mean that development may also take place outside of existing small settlements. This is in accordance with guidance in paragraph 41 of PPS3.
Crewe and Nantwich Borough Council	No			Option C1 would rely on criteria rather than give targets for all settlements. This will give Local Planning Authorities more freedom to address rural housing through the Local Development Framework. It is more likely to deliver appropriate levels of rural housing in the right locations, than the setting of overall targets as advocated in options 2 and 3. This approach is

Organisation:	1. Do you agree with Housing Option C2?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		preferred. This approach is preferred.		

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 18 blank responses.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
NWDA	We note that the options paper refers to 'Safeguarding rural areas' (p. 6). This does not appear to be consistent with Proposed Changes to Submitted Draft RSS where the text of Draft RSS Policy DP1 now refers to 'mainstreaming rural issues', noting that 'safeguarding' was felt to be too narrow an approach in light of the pressures facing rural areas. We would suggest therefore that references to 'safeguarding rural areas' are updated to 'mainstreaming rural issues' in order to ensure a consistent approach.
Bartonwillmore on behalf of Paycause Ltd	Option not supported
National Trust	No specific comments.
Manchester Disabled People's Access Group	Mapping of accessible accommodation to new standards which include better specifications than Decent Homes and Lifetime Homes and incorporate guidance on accessibility and sustainability
Haslington Parish Council	Need to ensure protection of rural areas to ensure communities retain their character.
Satnam Planning Services ltd	Flexibility as to locational matters, together with the characteristics of settlements needs to be investigated.
Carlisle City Council	There would be implications for definition of centres over and above key service centres but this must be determined through LDFs. This would make it more difficult to provide an adequate figure at a regional level.
Lambert Smith Hampton	Amend/revise Policies SD1, SD2 and SD3 of the RSS to support development in settlements <10,000 as policies currently support development around regional poles and surrounding area. Amend/revise Policy UR1 which relates to urban renaissance. Amend/revise Policy RU3 of the RSS to support housing provision more in rural areas. Review/amend Policy RDF1 to support

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	development in rural locations and Policy RDF2 to support development in rural housing provision. Amend sub-regional policy framework to support the rural housing provision.
Allerdale Borough Council	As above, policy should be based upon the KSC/LSC split rather than an arbitrary population figure.
Emerson Group	Review the rural orientated policies.
LDNPA	Recognise the importance of local needs surveys! Put the hooks in place to encourage these to be done.
Wirral MBC	This Option may represent a change to the overall spatial strategy.
Cumbria County Council / Cumbria Strategic Partnership	It is not clear as to what the policy implications might be arising from using this option.
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	Policies DP1, DP8, RDF2, RDF5, L4 and Table 7.1

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

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

Organisation:	3. In taking forward this option, what are the implications for:
Bartonwillmore (<i>on behalf of Paycause Ltd</i>)	A) Delivery: Option not supported
	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: Will be dependent upon actions at the local level in terms of assessing requirements, considering potential impacts (e.g. on landscape capacity) and taking forward allocations in LDDs.
	B) Infrastructure provision? It will be important to ensure that high sustainability standards are met in order to reduce pressure upon infrastructure and meet more needs on site, e.g. in terms of high energy efficiency, on site renewables (especially for medium to large scale developments), minimisation of water use and grey water recycling, waste minimisation and recycling.
	C) Community and social issues? No additional comments.
	D) Environment? NB Comments at A) above re-landscape character capacity to accept change; also issues relating to other environmental assets, their safeguarding and enhancement will need to be addressed.
	E) Economy? Need to consider the role of rural diversification and opportunities for new local employment (including live-work units and IT provision) to reduce commuting activity.
Haslington Parish Council	A) Delivery: -

Organisation:	3. In taking forward this option, what are the implications for:
	<p>B) Infrastructure provision? -</p> <p>C) Community and social issues? Need to retain existing character of local communities.</p> <p>D) Environment? Need to ensure existing Green Gaps and Green Belts are protected and potentially expanded – in order to preserve the character of local areas e.g. between Crewe and surrounding villages such as Haslington.</p> <p>E) Economy? -</p>
Satnam Planning Services Ltd	<p>A) Delivery: Good prospects.</p> <p>B) Infrastructure provision? Poor, as high levels of affordable housing will not bring forward the developer led infrastructure requirements and improvements without financial incentives.</p> <p>C) Community and social issues? A mixture of affordability issues being addressed and social issues being increased.</p> <p>D) Environment? Risk of damage unless handled carefully.</p> <p>E) Economy? Good for the rural economy but should not be allowed to lead to increased levels of commuting.</p>
Lambert Smith Hampton	<p>A) Delivery: Unable to comment on deliverability of rural housing provision until the figures have been fully tested and the Housing Land Availability Assessments have been carried out throughout the region.</p> <p>B) Infrastructure provision? Rural housing provision may not improve infrastructure if the numbers provided are relatively small.</p> <p>C) Community and social issues? Increased rural housing provision will provide a wider choice of housing, high quality housing, mixed communities in terms of tenure and price and a mix of different households.</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>D) Environment? Would support regeneration of brownfield sites in rural locations, would reduce the potential of skewed investment in certain areas of the region.</p>
	<p>E) Economy? Limited impact on the economy if housing numbers are small, limiting the provision of additional services and facilities.</p>
Allerdale Borough Council	<p>A) Delivery: Not clear at this stage</p>
	<p>B) Infrastructure provision? As above</p>
	<p>C) Community and social issues? As above</p>
	<p>D) Environment? As above</p>
	<p>E) Economy? As above</p>
Emerson Group	<p>A) Delivery: Likely delay whilst policy is formulated and trickles down to District levels. Local opposition likely to this level of change.</p>
	<p>B) Infrastructure provision? Careful consideration needed of how extra capacity can be provided and where. Use existing spare capacity where available and sustainable.</p>
	<p>C) Community and social issues? Provision of any extra facilities needs to be programmed in to local policy formulation.</p>
	<p>D) Environment? Impact on open countryside and , potential green Belt.</p>
	<p>E) Economy? Upgrade of rural employment opportunities will be needed otherwise commuting likely to increase.</p>
LDNPA	<p>A) Delivery: All the settlements within the LDNP have a population under 10,000 so all new housing provided contributes to this aspiration. Usual delivery issues, land acquisition, build costs, unit grant price, etc</p>
	<p>B) Infrastructure provision? usual things as previously expressed, highways, waste, utilities, sewerage, water provision,</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>flooding, etc. all difficult to negotiate with service providers due to economies of scale.</p> <p>C) Community and social issues? All new housing in rural areas should have a positive effect on supporting and maintaining vibrant communities. They need to be secured so that these units are not lost to the open market and thus contributing further to the external demands from inward migration and second home ownership.</p> <p>D) Environment? The capacity of the environment to accommodate house building needs to be considered when establishing figures.</p> <p>E) Economy? The retention of local people to support local businesses is important.</p>
Taylor Young Ltd	<p>A) Delivery: Developers may be discouraged from developing in certain rural areas if there is a high requirement for affordable homes here. How will this be enforced?</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? Once again - resistance from the existing communities is to be expected especially if a set figure is put in place</p> <p>D) Environment? Development sites are going to be primarily greenfield sites</p> <p>E) Economy? See response to A1.2</p>
Wirral MBC	<p>A) Delivery: Wirral's villages are in the Green Belt and a number are designated conservation areas, where development would need to be more carefully considered and controlled.</p> <p>B) Infrastructure provision? -</p> <p>C) Community and social issues? -</p> <p>D) Environment? Wirral's villages are in the Green Belt and a number are designated conservation areas, where development</p>

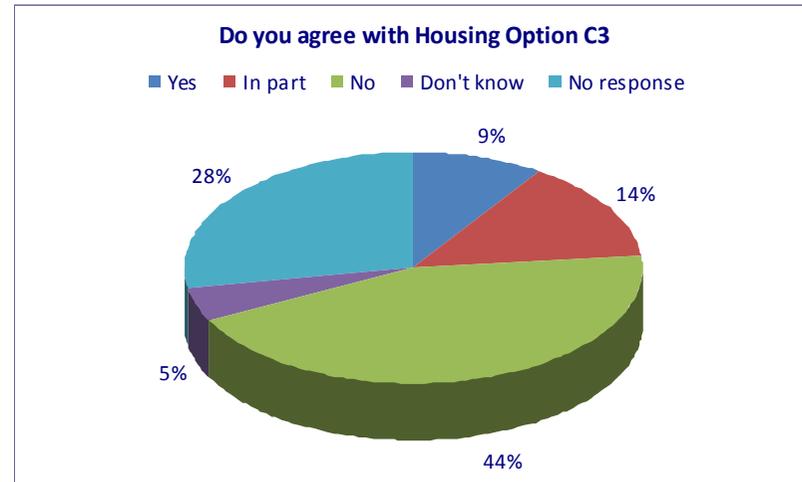
Organisation:	3. In taking forward this option, what are the implications for:
	would need to be more carefully considered and controlled.
	E) Economy? -
Manchester Disabled People's Access Group	A) Delivery: Requires an agreed set of specifications and design standards for accessible housing Financial strategies for affordable housing to be made available for buyers
	B) Infrastructure provision? Design standards incorporating accessibility and sustainability 2. Mapping process across the region to cover social housing and private sector housing 3. Encourage local authorities to provide percentage of accessible and adaptable accommodation 4. Advice and guidance for developers and for potential tenants, residents and community groups on options
	C) Community and social issues? Need to support mixed and sustainable communities, including range of ages, family structures and housing provision, along with community facilities, employment and travel opportunities
	D) Environment? Protection of green belt areas Design features to incorporate accessibility and sustainable, and energy conservation features
	E) Economy? -
Cumbria County Council / Cumbria Strategic Partnership	A) Delivery: There are concerns about whether or not RSLs developers/house builders would be able to deliver this number of new affordable units, given present funding arrangements. It is important that there should be sufficient open market housing sites allocated in the LDFs to enable the increased level of delivery via cross-subsidy through S106 agreements.
	B) Infrastructure provision? Not clear at this stage, however there may be implications for infrastructure especially within the rural parts of the County as well as the need to take proper account of the potential impacts upon the character of rural settlements.

Organisation:	3. In taking forward this option, what are the implications for:
	C) Community and social issues? It is considered that there are likely to be effects upon community and social issues in the rural parts of the county.
	D) Environment? Consideration will need to be taken of the environmental effects of higher levels of provision of affordable housing, especially in the rural parts of the County, such as South Lakeland and Eden.
	E) Economy? It is likely that an increase in the provision of affordable housing would support the development of the economy, especially in rural areas.
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	A) Delivery: No different implications to the NWP.
	B) Infrastructure provision? No different implications to the NWP.
	C) Community and social issues? This will assist in ensuring the long-term survival of key essential facilities and services in the rural area (e.g. post offices, pubs, general stores, etc).
	D) Environment? No different implications to the NWP.
	E) Economy? This will assist in enabling young professionals and skilled workers to remain in their rural locality, thus assisting in the diversification of the rural economy.

1. Do you agree with Housing Option C3?

Do you agree with Housing Option C3?	
Yes	4
In part	7
No	21
Don't know	2
No response	12
Total Responses	46

The table below shows the verbatim comments received. We have removed 7 blank responses.



Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Macclesfield Borough Council	No			Macclesfield Borough Council supports the approach set out in option C1 not to give an indication of the level of housing provision in rural areas. This would rely on criteria rather than give targets for all settlements and give local planning authorities more freedom to address rural housing through the Local Development Framework. It is more likely to deliver appropriate levels of housing in rural areas than the setting of targets advocated in options C2 and C3. These options would lead to an increase in market housing in rural areas, with a negotiated proportion of affordable housing within each scheme. The draft Macclesfield Strategic

Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		Housing Land Availability Assessment has shown that the vast majority of our available sites are in urban areas, and there are insufficient sites in rural areas to accommodate general market housing. Sites that would otherwise be considered unsuitable for housing may be able to accommodate small schemes for 100% affordable provision under option C1.		
Indigo Planning Limited	No	As above (answer to C2)CEG consider that there is a need to set provision levels for rural housing delivery, but that these need to be based on local needs and survey work undertaken through production of the SHLAA.		
National Housing Federation	Yes	<p>The rural economy and the rural affordable housing crisis go hand in hand. Limited development of affordable homes in rural areas leaves rural employers with restricted opportunities for recruitment. Improving and increasing the affordable housing offer in rural areas is vital to help sustain rural businesses and communities.</p> <p>Every year the potential to secure more rural affordable homes from the planning system is missed when there are no robust section 106 agreements in place. Given the urgent pressure on the lack of affordable homes in rural areas this must be addressed.</p> <p>Please see the Federation’s response to the Matthew Taylor review on the rural economy and affordable housing for more detail.</p>		
Bartonwillmore on behalf of Paycause Ltd	No	Paycause supports the general principle of clear guidance on proportion of growth towards such areas, however there is a need to ensure that the growth is appropriate to settlements and does not undermine the overall spatial framework of the RSS which seeks to prioritise growth towards "higher order		

Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		settlements" such as Chester.		
Preston City Council	No	Both this option and C2 impinge on local planning authorities' ability to determine the spatial vision for their area and therefore on their ability to produce Core Strategy where this level of detail is more appropriate. Therefore, the only option that can realistically be supported is C1.		
National Trust	No	Unrealistic to assess requirements at this scale of settlement – this needs to be pursued as a bottom up, not a top down exercise, which will need initially to be considered by LPAs in their LDFs (and possibly cross-boundary through HMA work).		
Lancashire County Council	Yes	Option C3 is supported in principle. To recognise local circumstances it is considered that a figure would need to be provided for each housing market area.		
Cheshire West and Chester (comments represent informal officer views)	No	It is difficult to see on what basis a figure could be set that would be applicable across the region. This is a matter for LDFs. The RSS could certainly flag up this issue and ask LPAs to give it proper consideration preparing DPDs, particularly Core Strategies.		
Manchester Disabled People's Access Group	Don't know	Don't have enough evidence to make any decision on this option		
Haslington Parish Council	In part	Need to ensure that local communities are explicitly involved in the setting of the targets that directly affect them.		
Merseyside Policy Unit	No	We support Option C1, which would allow those districts which do have significant rural housing to guide development in their rural areas without RSS setting housing requirements		
Copeland Borough Council	No	It is considered that a bottom-up approach utilising the local Cumbria Strategic Housing Market Assessment to derive a local Cumbria rural requirement would be a more sound		

Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
				evidence base to implement at a local level. PPS3 (Housing) advises that it is a requirement for Local Authorities to carry out Strategic Housing Market Assessments (SHMAs) and Strategic Housing Land Availability Assessments (SHLAAs), and it emphasises the importance of this bottom-up approach to defining local housing needs. The top-down approach in this option is not therefore considered appropriate to local planning for housing provision.
Satnam Planning Services ltd	No			This would represent a level of detail not appropriate for RSS.
Carlisle City Council	In part			There is a need to ensure that rural areas are not missed when considering overall housing supply and the figures as part of the spatial strategy. Getting to pre-determined levels for individual centres is too detailed for RSS
Lambert Smith Hampton	No			Option C3 is going beyond the role of strategic planning. This option assumes that all settlements have the same facilities and services. This is unrealistic. It is the role of the LPA (who is best placed) to ensure that rural housing provision is provided in the most appropriate settlements in PPS3 terms. Providing rural housing provision figures at the strategic level would limit the control the LPA has in deciding where the most appropriate location for additional housing provision should be situated.
West Lancashire District Council	No			It is impossible to make a judgement at this point in time without knowing the results of the SHLAA and the effect upon rural settlements in the District. This issue should be left to Core Strategies and Site Allocations DPDs and assessments made both of housing need and whether settlements have sufficient services.

Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Ribble Valley Borough Council	No			RVBC consider that Affordable Housing should be determined at the local level
Allerdale Borough Council	No			Our reasons are similar to those in Option C2. Use of a population threshold is arbitrary and inappropriate. One of our KSCs, as presently designated, has a pop. of less than 3000. As stated above, it would be more helpful for us if an indicative proportional split were given between KSCs and LSCs. As before a bottom up approach should inform the split in LDFs.
Emerson Group	In part			Guidance will be necessary to inform LDD's.
LDNPA	No			Too prescriptive. More appropriate for this to be locally led. It has the potential to undermine our policy approach in the LDNP. Technical research not drilled down sufficiently to the local level and is therefore not reflective of actual need. The Affordable Rural Housing Commission final report noted the problems of data not being available at the local level. It recommends that those undertaking HMAs should use data at least at ward level and ideally below that, and should take account of the views of local communities.
Taylor Young Ltd	In part			It will highlight the need that growth needs to be spread through all settlements and cannot be met purely by the big cities.
Wirral MBC	No			Development in rural settlements is too sensitive. It should be for local authorities to decide in consultation with their own local communities through Community Strategies etc., to protect the character of these settlements. Rural housing can still be provided by each district within each district's housing requirement based on local circumstances.
Upper eden Community Plan	Yes			The provision of housing and affordable housing in rural

Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Group				<p>areas is locationally critical. The evidence of need for housing in rural areas overwhelmingly points to that need being most acute in the smaller rural settlements. This does not mean that the need is large, rather that the need is small, but acute. Small settlements, hamlets and sparse parishes require, like everywhere else, a level of housing development that will allow the community and economy to remain stable, and hopefully improve. To allow this to happen, planning policy should explicitly allow small levels of development in all parishes commensurate with their needs. We estimate that an annual allocation of 1% of the existing household figure of a parish will sustain that community and encourage younger people to stay. Such a policy will not exclude the majority of the population of rural districts like Eden from the opportunity to maintain the family and social networks essential for sustainable living. The Governments overall policy aim for housing and planning in paragraph 9 of PPS3 states that everybody should be given the opportunity to live in a decent home, which they can afford, in a community where they want to live. Recent policies have prevented this aim from being achieved. It is important therefore for regional policy to make clear that housing must be provided in smaller communities, and indeed to prevent any community from being excluded from the opportunity to provide housing to meet its needs. The CRC is therefore correct to highlight the need for RSSs to set out the level of housing for smaller communities. In Eden the vast majority, some 70% of the population live in settlements of less than 3000, and most live in settlements of less than 1000. Regional policy should not only set out targets for housing in these settlements, but should encourage LPAs to use Parish Plans to determine local targets</p>

Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>at parish level. In the Upper Eden area we have developed a formula approach to cover 17 parishes based on 1% per annum of existing households within each Parish. We believe that this approach can not only deliver a controlled and essential level of housing to the most sparse areas of the country, but can also deliver the majority of it as affordable housing. Through self build affordable housing schemes. The implications for monitoring this approach are unclear. LPAs have a duty to monitor housing in any event, and the ability to classify new development as affordable or otherwise, and the type of location in which it falls is well developed. We do not see any difficulty with undertaking a monitoring exercise suitable to allow this policy approach to be adopted. It may be that the correct approach could encourage parishes to participate in the monitoring process thus alleviating the principle authorities from any additional responsibilities.</p>		
Pendle Borough Council	No	<p>Setting figures for settlements of less than 3,000 and between 3,000 – 10,000 would be restrictive and would provide less flexibility for local authorities to decide where new dwellings should be located. The location of new housing should be determined at the local level, taking into account local circumstances. The local evidence base is best placed to determine the most sustainable locations for new development. Evidence base work on the sustainability of rural areas has been undertaken to identify which settlements can accommodate an increase in development. This work looks specifically at the existing levels of service provision and where there is potential capacity for further development. This work has been specifically undertaken following the decisions from inspectors on Core Strategies which have failed from not having a robust evidence base in</p>		

Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		place to show that settlements are sustainable and can accommodate housing growth. If a rural housing provision figure has to be derived it would be more appropriate to provide an affordable housing figure for rural areas rather than an overall housing figure. However, this would need to be aligned with the figure derived in the SHMA.		
Chorley Council	No	This option impinges on the ability of a local planning authority to determine the spatial vision for their area and therefore on their ability to produce a Core Strategy where this level of detail is more appropriate		
Congleton Borough Council	Don't know	It is not clear from the detail provided with the option whether this figure for the provision of rural housing will be provided for the region as a whole, or by housing market area or by local authority or whether the figure will be a maximum or minimum figure. It is also not clear how the figure will be determined, for example will it purely be based on the Affordable Rural Housing Commission figure of 11,000 units per annum. Again, it is suggested that above approaches rather oversimplify some of the more complex issues that will need to be addressed in relation to development within the rural areas. A figure could be provided but further consideration would need to be given to a number of related issues such as the sustainability of development in these rural areas, the effects on their existing infrastructure (services, amenities, transport etc), the significant differences between the rural areas across the region and the relationship of these developments to the urban areas in close proximity.		
Cheshire East Council	No	Option C1 would rely on criteria rather than give targets for all settlements. This will give Local Planning Authorities more freedom to address rural housing through the Local		

Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		Development Framework. It is more likely to deliver appropriate levels of rural housing in the right locations, than the setting of overall targets as advocated in options 2 and 3.		
Chester City Council	No	While the importance of housing provision in the rural area is acknowledged, a rigid target for house building for settlements of below 3,000 and between 3,000 and 10,000 people would reduce the flexibility of local authorities to plan for local needs. If a rigid formula is adopted, especially in smaller settlements, the danger is that problems with bringing forward any one site could severely affect the ability of local authorities to deliver growth in those settlements and so meet RSS targets. In addition, while some smaller settlements may have the capacity for a higher level of growth – such as available brownfield sites - and benefit from good transport infrastructure, other settlements of a similar size may be less sustainable and have less capacity to accommodate growth. The distribution of housing development within an area should be for local authorities to determine through their Local Development Frameworks, taking into account the views of local communities, local need, capacity and sustainability.		
CPRE North West	In part	To meet the recommendations of the Commission for Rural Communities and the Affordable Rural Housing Commission, RSS should set out guidance on the levels of housing to be delivered in settlements of under 3,000, and between 3,000 and 10,000. The type of development is set out in policy RDF2 – Rural Areas, ie to be of a scale and nature appropriate to meeting local needs, and to improve the quality of rural life. There is a very significant shortfall in the availability of affordable housing in particular in rural communities. This must be addressed in order to retain rural		

Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>settlements as functioning communities rather than commuter dormitories or retirement villages. However, it is vital in pursuing this option that levels of affordable and market housing are distinguished from each other. There is a danger, particularly in the current economic / housing market conditions, that this policy option could be used in order to open up greenfield sites for executive housing that does nothing to improve the balance or viability of rural communities. If this option is pursued, robust mechanisms must be put in place to prevent this happening. It will be important to ensure that the policy promotes targeted delivery to areas where housing will meet an identified need and will tackle issues of rural deprivation and decline of rural communities and economies. It is also vital, in order to comply with the spatial principles underpinning RSS, that any level set out under this option be seen as a target and a maximum, and NOT as a minimum level. This would compromise the requirements to maintain and enhance environmental quality and local character and distinctiveness, and would have the potential to undermine the spatial framework.</p>		
Cumbria County Council / Cumbria Strategic Partnership	No	<p>It is considered that a bottom-up approach utilising the local Cumbria Strategic Housing Market Assessment to derive a local Cumbria rural requirement would be a more sound evidence base to implement at a local level.</p> <p>PPS3 (Housing) advises that it is a requirement for Local Authorities to carry out Strategic Housing Market Assessments (SHMAs) and Strategic Housing Land Availability Assessments (SHLAAs), and it emphasises the importance of this bottom-up approach to defining local housing needs.</p> <p>The top-down approach in this option is not therefore</p>		

Organisation:	1. Do you agree with Housing Option C3?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		considered appropriate to local planning for housing provision.		
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	In part			
Crewe and Nantwich Borough Council	No	Option C1 would rely on criteria rather than give targets for all settlements. This will give Local Planning Authorities more freedom to address rural housing through the Local Development Framework. It is more likely to deliver appropriate levels of rural housing in the right locations, than the setting of overall targets as advocated in options 2 and 3. This approach is preferred.		

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 27 blank responses.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
National Trust	No specific comments.
Haslington Parish Council	Need to ensure protection of rural areas and their local identities.
Lambert Smith Hampton	Amend/revise policies SD1, SD2 and SD3 of the RSS to support development in settlements <3,000 and 3-10,000 as policies currently support development around regional poles and the surrounding area. Amend/revise Policy UR1 which relates to urban renaissance and relate it so that it includes rural renaissance. Amend/revise Policy RU3 of the RSS to support housing provision

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	more in rural areas. Review/amend Policy RDF1 to support development in rural locations and Policy RDF2 to support development in rural housing provision. Amend sub-regional policy framework to support rural housing provision.
Allerdale Borough Council	As stated above, policy should be based upon the KSC/LSC split and informed by affordable housing needs. It must always be remembered that in seeking a particular housing mix and a level of affordable provision in the development control process, the local housing survey/assessment should be paramount.
Emerson Group	If a target figure is to be built into the Review then the general level should be stated and, probably the Housing Market Area distribution given. Thereafter the LDD's can provide the more detailed locations in terms of
LDNPA	Changes to HPDG would be useful to provide the carrot and not just the stick!
Wirral MBC	This Option may represent a change to the overall spatial strategy.
Upper Eden Community Plan Group	As previously stated, a higher allocation of housing for rural areas will be required in order to allow both the ability to tackle the affordable housing need, and keep the general population stable and productive. A focus of new development should occur within the largest settlements together with a controlled level of development in the smaller ones. Such an approach for Eden will require an allocation and delivery of something over 300 units per year. Despite the work they require, HMAs are crude tools for policy making even at District level. Policy should encourage finer and finer grain assessments of housing markets and use the results to set (eventually) site specific targets. Parishes are particularly well placed to carry out this work. Affordable housing targets should be set in absolute terms by higher tier policy and set as proportions as locally as possible. In general and hitherto, Regional Policy has ignored parish representation, and in fairness, parishes have ignored Regional Policy. There is much that can be gained by combining the local with the strategic. The issue of sustainable development is often misunderstood by policy makers, giving too great an emphasis on carbon emissions for transport use rather than the opportunities development in small communities can create. Regional policy has an opportunity to clarify the role appropriate rural development can play in sustaining small communities, contributing to

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
	renewable energy targets, and diversifying the rural economy. Higher tier policy has a role in setting the agenda to tackle unsustainable behaviour, rather than seeking to identify unsustainable locations.
CPRE North West	This option would be implemented most effectively if total housing provision in RSS was treated as both a target and a maximum. Policies RDF2 and possibly DP8 would have to be refined in order to reflect this option. There would need to be an even clearer policy statement that development in rural areas must be to improve the sustainability of those settlements as living, functioning communities.
Cumbria County Council / Cumbria Strategic Partnership	It is not clear as to what the policy implications might be arising from using this option.
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	Policies DP1, DP8, RDF2, RDF5, L4 and Table 7.1

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

The table below shows the verbatim comments received. We have removed 27 blank responses.

Organisation:	3. In taking forward this option, what are the implications for:
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 NWto meet the RSS spatial approach. It is noted that it is deiverse 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 b this Housing Options Paper that there are cress boundary issues with Flintshire and W 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.</p>
	<p>B) Infrastructure provision? -</p>
	<p>C) Community and social issues? -</p>
	<p>D) Environment? -</p>
	<p>E) Economy? -</p>
National Trust	<p>A) Delivery: No specific comments.</p>
	<p>B) Infrastructure provision? No specific comments.</p>
	<p>C) Community and social issues? No additional comments.</p>
	<p>D) Environment? No specific comments.</p>
	<p>E) Economy? No specific comments.</p>
Haslington Parish Council	<p>A) Delivery: -</p>
	<p>B) Infrastructure provision? -</p>

Organisation:	3. In taking forward this option, what are the implications for:
	<p>C) Community and social issues? -</p> <p>D) Environment? Need to ensure existing Green Gaps and Green Belts are protected and potentially expanded – in order to preserve the character of local areas e.g. between Crewe and surrounding villages such as Haslington.</p> <p>E) Economy? -</p>
Lambert Smith Hampton	<p>A) Delivery: Unable to comment fully on deliverability of rural housing provision until the figures have been tested and the Housing Land Availability Assessments have been carried out throughout the region.</p> <p>B) Infrastructure provision? Rural housing provision may not improve infrastructure if the numbers provided are relatively small.</p> <p>C) Community and social issues? Increased rural housing provision will provide a wider choice of housing, high quality housing, mixed communities in terms of tenure and price and a mix of different households. But may increase reliance on the motor vehicle.</p> <p>D) Environment? Would support the regeneration of brownfield sites in rural locations, would reduce the potential of skewed investment in certain areas of the region. However, would potentially increase unsustainable development if development was encouraged in areas which had few facilities and services.</p> <p>E) Economy? Limited impact on the economy if housing numbers are small, limiting the provision of additional services and facilities in these areas.</p>
Allerdale Borough Council	<p>A) Delivery: Not clear at this stage</p> <p>B) Infrastructure provision? As above</p> <p>C) Community and social issues? As above</p>

Organisation:	3. In taking forward this option, what are the implications for:
	D) Environment? As above
	E) Economy? As above
Emerson Group	A) Delivery: Likely delay whilst policy is formulated and trickles down to District levels. Local opposition likely to this level of change.
	B) Infrastructure provision? Careful consideration needed of how extra capacity can be provided and where. Use existing spare capacity where available and sustainable.
	C) Community and social issues? Provision of any extra facilities needs to be programmed in to local policy formulation.
	D) Environment? Impact on open countryside and , potential green Belt.
	E) Economy? Upgrade of rural employment opportunities will be needed otherwise commuting likely to increase.
Wirral MBC	A) Delivery: Wirral's villages are in the Green Belt and a number are designated conservation areas, where development would need to be more carefully considered and controlled.
	B) Infrastructure provision? -
	C) Community and social issues? -
	D) Environment? Wirral's villages are in the Green Belt and a number are designated conservation areas, where development would need to be more carefully considered and controlled.
	E) Economy? -
Upper Eden Community Plan Group	A) Delivery: There will be less risk to the delivery of the overall housing figures in rural areas by encouraging a more dispersed development pattern. More potential housing sites will be available. However, the proportions and thresholds for affordable housing will be a key factor in this. The smallest settlements will be able to accept the highest proportion of affordable housing as self build

Organisation:	3. In taking forward this option, what are the implications for:
	schemes in single unit developments.
	B) Infrastructure provision? Important infrastructure vital for the well being of communities, such as education and health facilities, will be sustained by a stable population. There is more likely to be capacity in the local road, water and sewage infrastructure for a series of small scale developments dispersed throughout the rural areas.
	C) Community and social issues? Settlements of less than 3000 require identified housing allocations to allow those in the community to plan ahead for their families. The ability to be secure in the knowledge that family members can remain local will affect a number of key life decisions such as educational choices for children, care for elderly parents, business development, self employment, farming practices, and, marriage and relationships. Without the confidence that the necessary housing will be available to support these choices, many such decisions may be put off, avoided, or taken elsewhere. The result is that the local communities are diminished through exodus.
	D) Environment? The environmental impact of setting housing targets for small communities will protect greenfield areas adjacent to the larger settlements by reducing the requirement for all the housing to be located there. The corollary is that small sites will be developed within smaller settlements. Overall, a more 'organic' pattern of development will ensue creating a less intrusive visual impact on the landscape. Smaller scale developments will also be more likely to fall within the environmental capacity of sites than larger ones. For a given quantity of development in an already sparsely developed rural area, a series of smaller individual schemes will be more acceptable than a fewer larger schemes.
	E) Economy? A policy that encourages a greater number of smaller housing developments in smaller settlements will encourage smaller building firms to be sustained and grow in the rural areas. This will

Organisation:	3. In taking forward this option, what are the implications for:
	benefit the rural economy through reducing the net loss of economic multipliers to large volume house builders based outside the rural area. Completed housing within smaller settlements secured for local people will improve the local economy by providing additional markets and labour for local firms and service providers.
CPRE North West	<p>A) Delivery: This option should ensure that sufficient, but not excessive, housing development would take place within rural settlements to ensure that they can be sustained as functioning, mixed, balanced communities.</p> <p>B) Infrastructure provision? In giving guidance on the amount of housing to be accommodated in rural areas, consideration would need to be given to the provision of sustainable transport infrastructure (eg public / community / demand responsive transport); environmental infrastructure (eg water supply / waste water); green infrastructure (eg play areas); and social infrastructure (eg schools, health services, shops, employment opportunities) in, or accessible by sustainable means from, rural communities.</p> <p>C) Community and social issues? This option has the potential to improve the sustainability of rural communities, retaining younger people and those on lower incomes, and improving the mix and balance of population in rural settlements.</p> <p>D) Environment? This option would have to be very carefully managed in order to ensure that it did not result in any dilution of the requirements to maintain and enhance environmental quality and local character and distinctiveness.</p> <p>E) Economy? This option has the potential to boost the rural economy by enabling more people of working age to live and work in rural settlements.</p>
Cumbria County Council / Cumbria Strategic	A) Delivery: There are concerns about whether or not RSLs developers/house builders would be able to deliver this number of

Organisation:	3. In taking forward this option, what are the implications for:
Partnership	<p>new affordable units, given present funding arrangements. It is important that there should be sufficient open market housing sites allocated in the LDFs to enable the increased level of delivery via cross-subsidy through S106 agreements.</p> <p>B) Infrastructure provision? Not clear at this stage, however there may be implications for infrastructure especially within the rural parts of the County as well as the need to take proper account of the potential impacts upon the character of rural settlements.</p> <p>C) Community and social issues? It is considered that there are likely to be effects upon community and social issues in the rural parts of the county.</p> <p>D) Environment? Consideration will need to be taken of the environmental effects of higher levels of provision of affordable housing, especially in the rural parts of the County, such as South Lakeland and Eden.</p> <p>E) Economy? It is likely that an increase in the provision of affordable housing would support the development of the economy, especially in rural areas.</p>
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	<p>A) Delivery: No different implications to the NWP.</p> <p>B) Infrastructure provision? No different implications to the NWP.</p> <p>C) Community and social issues? This will assist in ensuring the long-term survival of key essential facilities and services in the rural area (e.g. post offices, pubs, general stores, etc).</p> <p>D) Environment? No different implications to the NWP.</p> <p>E) Economy? This will assist in enabling young professionals and skilled workers to remain in their rural locality, thus assisting in the diversification of the rural economy.</p>