



PARTIAL REVIEW OF REGIONAL
SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A2.1
June – July 2008

A CONSUTATION REPORT

North West Regional Assembly

PARTIAL REVIEW OF REGIONAL SPATIAL STRATEGY (RSS) –

Consultation on the Draft Options: Housing A2.1

A consultation report from

CAG Consultants

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

July 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



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Introduction

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

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

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

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

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

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

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

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

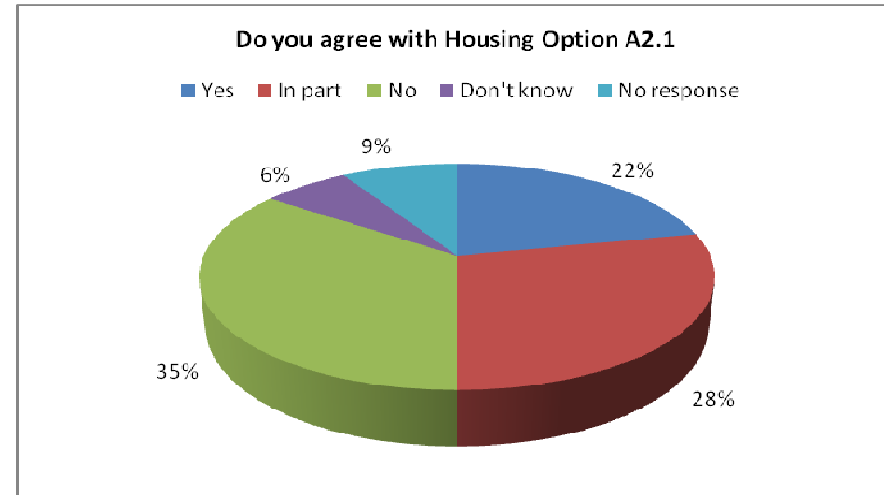


1 Questionnaire Responses

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

Do you agree with Housing Option A1.2?	
Yes	12
In part	13
No	16
Don't know	3
No response	4
Total Responses	47

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



Organisation:	1. Do you agree with Housing Option A2.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
Indigo Planning	In part	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).		
Northwest Regional Development Agency	Don't know	Option A2.1 states that the provision of housing considered, in the region of 28,000 dwellings per annum, will be at the low end of the range to be proposed by the NHPAU. Whilst this figure reflects the indicative range published within NHPAU's response to the Housing Green Paper (NHPAU (2007) Developing a target range for the supply of new homes in England, Table 18, p 30), the options paper should acknowledge that the final advice to Ministers is yet to be published and therefore the		

Organisation:	1. Do you agree with Housing Option A2.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>figures quoted are purely illustrative at this stage. We note that the draft Strategic Housing Market Assessment report recently published by NWRA contains an option based upon sub-regional economic forecasts which indicates an increase of around 927,000 households in the NW from 2006 to 2032 (in the region of 34,000 households per annum). We note that the report discounts this scenario on the basis that it is considered to be unrealistic. It would have been more appropriate to include this as part of the range of options, thereby allowing stakeholders the opportunity to comment on all aspects of the evidence base underpinning the partial review process. We would contend that it is more appropriate for options to be discounted through the testing and appraising of options in conjunction with wider consultative mechanisms.</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 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.</p>		
Home Builders Federation	No			
Environment Agency	No	<p>The Environment Agency understands that as part of the partial review you are required to 'test' the rates of growth which the National Housing Planning Advice Unit have advised Government are needed to stabilise affordability. However, currently without any supporting evidence the Environment Agency is unable to support the level of growth proposed in option A2.1. Unlike option A1.1 and A1.2 (issues with rural focus aside), a housing rate of at least 28,000 per year (700,000 in total) has not yet been looked at in terms of its environmental/infrastructure impacts. Before any</p>		

Organisation:	1. Do you agree with Housing Option A2.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		option proposing this level of growth is progressed, we would expect it's sustainability and deliverability to be tested as part of the partial review process. The Environment Agency looks forward to contributing to this process.		
Bartonwillmore on behalf of Paycause Ltd		Paycause considers further consideration and detail of these estimates needs to be undertaken before it can fully support this option. However, what it does identify is that there is a need for an overall increase in housing provision in the region, which Paycause support in principle. Paycause supports the principle of an increase in housing numbers based on NHPAU evidence, however further investigation may identify a need for a further increase. Therefore whilst our client supports the principle of an overall increase, it reserves the right to reconsider its position based on more detailed evidence.		
GONW		The proposed ranges set out in options 2 and 3 will need to be considered in the light of the NHPAU report and the Government response to the report. Following the publication of the Governments response, GONW will provide more detailed comments on the housing figures. The lower end range figure is now above the annual average figure set out by NHPAU but falls within the range between the high and low figures. See comments made above in A1.1 re issues surrounding existing distribution. Following our initial comments about evidence base availability, there is undoubtedly considerable work to do indicate the deliverability of the options and to provide a clearer picture of how the options can meet the requirements of DP1-9.		
Preston City Council	Yes	This would accommodate growth point requirements while not implying that there would be increased development in rural areas.		
Halton Borough Council	Yes	This option is supported, as it would comfortably allow for current growth point proposals to be accommodated. However, a note of caution would need to be sounded, as Growth Points have a timescale through to 2016 while this policy would potentially be increasing housing provision through to 2032 – it would therefore represent much greater and more sustained growth than envisaged simply through the Growth Point proposals. This could have significant implications for the future of the Green Belt, for example, so any support for this option would need to be tempered until the actual policies were published and districts would have a chance to consider the potential impacts on housing land supply.		

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National Trust	No	The latest forecasts are actually lower than suggested here, but even then are based upon trends that have now halted and are reversing. Especially in the early stages of the plan period a more measured approach will be necessary.		
Blackpool Council	Yes	An option above the base option is supported but this option, if presented as an annual average, needs to be revised downwards to take into account the housing downturn or presented as a target development level without a requirement to overprovide in order to offset past underprovision and deliver an annual average. A caveat must also be placed on the reference to existing spatial distribution. The support for and ability of existing housing market areas and individual local authority areas to accommodate substantial growth in the longer term will vary. In the case of a small and already heavily urbanised area such as Blackpool there is simply insufficient capacity to sustain an increase on the emerging RSS figure over a 25 year period. See response to Option A1.1. The Council has formally endorsed a Growth Point submission that presupposes rates of housing development across Blackpool and the Central Lancashire authorities above those in emerging RSS.		
NHF	No			
Local resident	No	The lower of the 3 options is supported.		
Lancashire County Council	No	Further evidence of how the figures are derived is required. It is anticipated that 28000 dwellings per annum will be at the lower end of the range to be proposed by the NHPAU. (At the time of drafting this response, I have not seen the NHPAU advice.) In the 2nd Paragraph of Option A1.1 it states that the spatial distribution was agreed through the current review of the RSS. This spatial distribution may not be appropriate for Option A2.1 (and to a greater extent Option A3.1) as this involves a greater housing provision than Option A1.1.		
Sustainable Neighbourhoods Pool Manchester	In part			
Cheshire West and Chester (comments represent informal	Yes	<ul style="list-style-type: none"> • General comment - Options are all very broad brush and there is little background information on which to base views • Observation - Continuation of emerging RSS figures appears to be discounted as a realistic option • Delivery against emerging RSS 		

Organisation:	1. Do you agree with Housing Option A2.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
officer views)		<p>figures is going to be challenging. If figures rise (even to lower end of NHPAU range), unlikely to see delivery anywhere near those levels in the short term in the context of the current economic downturn. • The lower end of NHPAU range equates to an increase of about 21% over emerging RSS. This is higher than the minimum increase in housebuilding required to support New Growth Point bids. • Although not a policy issue, we are concerned that authorities in the NW, with yet higher housing figures, may lose out on Planning and Housing Delivery Grant (in terms of the element related to housing delivery) – at a time when resources are still very much needed • If new housing figures applied as minima, then this has a different meaning to saying that figures are not to be applied a ceiling. We are concerned that developers will seek to pick off easier to develop sites, undermining urban regeneration and renewal. • Matching infrastructure provision with the emerging RSS housing requirement is challenging; increasing housing targets will make this even more challenging. It needs to be acknowledged that significant increases in infrastructure investment – in transport, utilities, green infrastructure - will have to go hand-in-hand with accelerated levels of housing development. Authorities should be encouraged to put in place arrangements to benefit from the proposed Community Infrastructure Levy although there will need to be increased financial support from central government spending on infrastructure. • There will need to be a strong policy emphasis on the managed release of sites, particularly in the context of higher housing targets. Sites must still be released in a way that supports regeneration and optimises sustainability. • The approach in the options towards urban-rural re-apportionment is very crude. Housing figure have been adjusted only on the basis of broad city/sub-regions. Both the Liverpool and Manchester City Regions contain large rural areas. In fact most of rural Cheshire falls within these two city regions. The options are silent on potential reapportionment within city regions. It is difficult to see how the more inner urban areas of city regions will be able to increase levels of housing delivery to the levels in emerging RSS, never mind potentially higher requirements still through the partial review. There may be opportunities within key town and cities and also what have been described as 'key service centres' to accommodate further housing development. It also isn't clear what 'rural' actually means.</p>		
Haslington Parish Council	No	Still an Increased burden on rural communities to host additional housing.		

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Merseyside Policy Unit	In part	This option could potentially be supported, as it would comfortably allow for current growth point proposals to be accommodated. However, we would sound a note of caution, as Growth Points have a timescale through to 2016 while this policy would potentially be increasing housing provision through to 2032 – it would therefore represent much greater and more sustained growth than envisaged simply through the Growth Point proposals. This could have significant implications for the future of the Green Belt, for example, so our potential support for this option must be tempered until the actual policies are published and districts have a chance to consider the potential impacts on housing land supply.		
Copeland Borough Council	In part	We agree with the level of provision but would wish to see the Review include a new balance of distribution across Cumbria which would ensure that the regeneration priorities of West Cumbria are protected. The NWRA is a partner in the West Cumbria Strategic Forum along with all government depts and local authorities. Their joint commitment is to implementing the West Cumbria Masterplan (Britain's Energy Coast, 2007) and this estimates a requirement for up to 20,825 new dwellings over the period 2007 - 2032. However, if current RSS levels of distribution are maintained there is a danger that general housebuilding rates in the east and north of the County could jeopardise the markets in Copeland and Allerdale and thereby weaken the efforts towards the regeneration of West Cumbria.		
RPS Planning	No	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	Insufficient housing will be provided leading to lack of choice, low levels of affordability and lack of provision.		

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Carlisle City Council	In part	This would be the lowest growth of housing acceptable for Carlisle assuming that the proportional split within the sub-regional areas remains the same.		
Warrington Borough Council	Yes	This allows for accomodation of the intended growth points and is also sufficiently high to facilitate to help support affordable housing targets. It wouldn't create an oversupply as some of the higher options may, and builds in flexibility and opportunities for the future. Staying with the same spatial distribution retains focus on the urban areas and larger centres of population.		
Ribble Valley Borough Council	Yes	This is considered by members to most closely reflect the needs of Ribble Valley in terms of recognising a drive for increased housing delivery whilst still protecting the inherant qualities of the area.		
Liverpool City Council	In part	Option A2.1 represents an increase in housing numbers at the low end of need forecast by the National Housing and Planning Advice Unit. This option could be supported, as it would allow for current New Growth Point proposals to be accommodated. However, a note of caution would need to be sounded, as Growth Points have a timescale through to 2016 while this policy would potentially be increasing housing provision through to 2032 – it would therefore represent much greater and more sustained growth than envisaged simply through the Growth Point proposals. In essence, the city region could be tied in to delivering very high levels of new housing for a long period. This could have strategic implications including impact on delivery of the HMRPathfinder and other regeneration areas. There are also significant implications for the future of the Green Belt as housing delivery of this scale would have land supply implications. Any support for this option would need to be tempered until the actual policies were published and all districts in the LCR would have prepared a SHLAA to determine land supply.		
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 local planning authority 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. Retaining the		

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		spatial distribution would limit opportunities for providing rural housing provision and areas which have regeneration needs outside the Manchester and Liverpool City Regions. The current spatial distribution would also limit the choice and opportunities to grow, should Manchester and Liverpool be unable to meet their overall housing requirement.		
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	No	If housing were to be distributed across the Liverpool City Region as at present this would give a figure of 364 units a year to West Lancashire. This is on the high side, but it is difficult to comment without knowing the results of the SHLAAs in the Liverpool City Region and what sort of housing numbers would be required in West Lancashire itself.		
Allerdale Borough Council	Yes	This is Allerdale's Preferred Option (notwithstanding that we could also live with Option A1.1.) We support this option because; * It gives flexibility in the delivery of affordable housing; * It would allow Allerdale to take on board in our LDF certain aspirations of the "Energy Coast" Masterplan for West Cumbria, in a "wait and see" context. It, therefore, better aligns with economic strategies. * It would enable Allerdale to assimilate the possibility that Carlisle could be designated a "Growth Point", and the implications of this for north Allerdale. * This level of growth is more manageable than others and less likely to cause environmental or infrastructure problems. * It encompasses a level of growth more compatible with the Housing Green Paper.		
Emerson Group	No	The lower end of the range suggested by NHPAU is just that, the bottom of the potential projected housing supply. This could, if followed, when the economy recovers in a year or so, result in problems of undersupply and lead to inflationary pressures on house prices and further affordability problems.		

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LDNPA	In part	This would initiate only a small proportional rise in the target figure for the LDNP, however, bearing in mind the difficulties faced in housing provision within the LDNP we look cautiously to any suggested increase. Issues around delivery, infrastructure, land acquisition, etc all need to be considered from our perspective, we do not wish to be a 'hostage to fortune'.		
GVA Grimley (on behalf of Goodman)	In part	There are two main issues with this approach: 1. The recommended increase in housing numbers has not been addressed. 2. Providing more homes in rural areas as a general policy approach may not meet specific areas of demand and could lead to the neglect of some areas in severe need (whether rural or urban).		
Taylor Young Ltd	Yes	This seems a better mix of both target dwellings and distribution		
Wirral MBC	In part	Wirral would only be able to accommodate this Option (a 21% increase in provision) if the Liverpool/Wirral Growth Point is accepted, which assumed a total delivery of 600 units pa for Wirral		
Pendle Borough Council	No	This option would increase the annual provision figure for Pendle, however it is unlikely to be a significant enough increase to meet the requirements in the Burnley and Pendle SHMA. The SHMA for Burnley and Pendle indicates that there is a gross overall demand for new dwellings in the Pendle area. The SHMA identifies an annual provision figure of 275 dwellings which is higher than the figure proposed in this option. The annual figure for Pendle under this option (calculated as 215 on the basis of the current percentage split between authorities in the Central Lancashire City Region) is lower than the current average annual build rate within the borough which stands at 270 (over the last 5 years). It should also be noted that this average build rate will have been affected by the restrictive policy position which is currently in place. If this policy restriction were to be removed the build rates are likely to increase. Population projections and increases in household formation suggest that there will be an increase in the number of dwellings required to accommodate the population over the next 18 years. This evidence indicates that there is a need to provide a higher housing provision figure for Pendle.		
Congleton Borough Council	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		

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		<p>ensure that an appropriate balance is provided which would allow the Borough to:</p> <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. <p>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.</p>		
Crewe and Nantwich Borough Council	In part	<p>This option would provide the flexibility to accommodate any successful growth point bids announced by the Government in terms of the overall provision, although the spatial distribution may not accommodate all bids. As this option represents a 21% increase on the level of provision in the draft RSS, it would be subject to further testing through the appraisal process and the findings of technical evidence which have yet to be completed. Recent housing completions in south Cheshire have in recent years been considerably above this figure; but its adoption long term would mean an increase in green field development.</p>		
Macclesfield Borough Council	No	<p>There was significant doubt that 400 additional dwellings per year could be accommodated within the borough without 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</p>		

Organisation:	1. Do you agree with Housing Option A2.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>outstanding permissions is diminished in size and meeting the backlog in the first five years will be very challenging.</p>		<p>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.</p> <p>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> <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</p>

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		<p>appropriate.</p> <p>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>		
Cumbria County Council / Cumbria Strategic Partnership	Yes	<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 A2.1 that the figure of 2,660 for Cumbria and North Lancashire should necessarily mean that Cumbria would retain the current proportionate split of the Proposed Changes to RSS (currently 1,796 for Cumbria and 400 for Lancaster = 2,196).</p> <p>Assuming that the proportionate split of the Proposed Changes to RSS remains unchanged, Option A2.1 would, in effect, increase the annualised housing requirement in Cumbria from 1,796 dwelling units to 2,177 units per year, which equates to 21.1% (i.e. %x 2,660-2,196 in Option A2.1 table applied to Proposed Changes RSS Cumbria 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 - 323; Barrow – 182; Copeland – 279; Eden – 290; SLDC – 485; LDNPA – 73; and Carlisle – 545 units (Total 2,177).</p> <p>Data held by Cumbria County Council shows that the previous historic 10-year (1996-2005) average annual rate of dwelling completions in Cumbria were: Allerdale – 222; Barrow – 110; Copeland – 205; Eden – 223; SLDC – 328; LDNPA – 131; and Carlisle – 393 dwelling units (Total 1,612).</p> <p>It is considered that this level of new housing growth at 21.1% would be better than</p>		

Organisation:	1. Do you agree with Housing Option A2.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		<p>the levels in the Proposed Changes to RSS, and would be much more manageable than the previous example of 57.9% in Option A1.2. The main concern would be the potential impact of growth upon South Lakeland and Carlisle Districts and their local environments and infrastructure, and whether or not it would meet the aspirational future economic growth for the county, especially in West Cumbria.</p> <p>There are concerns that there should be sufficient levels of new housing proposed in the Partial Review of RSS for West Cumbria to satisfy the Energy Coast master plan, which identifies the need to provide for 5,500 new dwellings over and above the Proposed Changes to RSS. It is considered that there should be sufficient flexibility in the RSS for these Districts to respond to the growth agenda for West Cumbria.</p> <p>There is also a concern that in South Lakeland, the level of new housing (400 new dwelling units per annum) identified in the current Proposed Changes to RSS is near to the environmental and infrastructure capacity of the area to absorb new development. It is also important that any new growth in South & East 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>Overall, it is considered that the level of housing growth in Option A2.1 is more likely to be compatible within environmental limits compared to other options, and would be less likely to lead to unsustainable levels of growth across the County. However, this aspect would require further more detailed consideration, and it might be that the current distribution of development amongst the Districts could be changed to meet local circumstances to support regeneration efforts in West Cumbria.</p> <p>The 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</p>		

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		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.		
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	In part	<p>Whilst we accept that the NHPAU's final report suggests that the minimum figure is lower than the figure set out in this consultation document (at 26,600 dwellings per annum net of clearance as set out in Table 11 of that report), this is the minimum figure to ensure affordability ratios remains at the same level at January 2007 and does not address affordability issues which have arisen before this date. We therefore consider that this level should be tested along with the upper range (see our comments on Question A3.1 and A3.2 below).</p> <p>Furthermore, as stated in the consultation document, it allows for any Growth Point bids to be included within these figures. See our response regarding distribution in our response to 1C of Question A1.1.</p>		
Sefton Metropolitan Borough Council	Yes	<p>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.</p>		
Crewe and Nantwich Borough Council	Yes	<p>This option would provide the flexibility to accommodate any successful growth point bids announced by the Government in terms of the overall provision, although the spatial distribution may not accommodate all bids.</p> <p>As this option represents a 21% increase on the level of provision in the draft RSS, it would be subject to further testing through the appraisal process and the findings of technical evidence which have yet to be completed.</p>		

Organisation:	1. Do you agree with Housing Option A2.1?	1a. If so why?	1b. If not, why not?	1c. Please explain your answer to the previous question.
		Recent housing completions in south Cheshire have in recent years been considerably above this figure; but its adoption long term would mean an increase in green field development.		

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 22 blank responses.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
Macclesfield BC	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.
Environment Agency	As stated above, the Environment Agency feels that option A1.1 and A1.2 are the most likely to be deliverable based on the current policy framework within RSS (certainly to 2021). Option A2.1 with its minimum 700,000 new homes proposed will potentially have a greater impact on other policy areas within RSS. For example, will this level of growth mean we need to move from encouraging to requiring the retrofitting of SUDS and water efficiency measures into existing development in policy EM5. The implications of this on other EM and DP policies would also need to be considered. Can this level of growth be accommodated in line with policy DP4 and its focus on making the best use of resources and infrastructure. Particularly can its sequential approach to the use of buildings and land and the regional brownfield target of 70% (policy L4) be achieved with this uplift in provision?
Bartonwillmore on behalf of Paycause Ltd	There will be a need to consider an early review of Green Belt land policy in the Liverpool City Region. However, where a potential opportunity exists for Growth Point status to be put forward by developers in order to meet housing demand within the Liverpool city region and in particular to meet the growing housing needs of Chester this may demonstrate very special circumstances to warrant early release. We note that Yorkshire and Humber Plan is undertaking a review following its publication in May 2008, where there is a "Call for Evidence" for developers to put forward potential Growth Points/Areas, areas for New Settlements and major expansion areas. Paycause believes it has interests which could help deliver increasing housing demands in Chester and would welcome the opportunity to discuss this with the NWRDA and put forward its interests formally at the regional level which could be used to inform the NW RSS spatial strategy.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
Preston City Council	No significant change in policy identified
National Trust	No additional comments.
Cheshire West and Chester (comments represent informal officer views)	Needs to be acknowledgement that enhanced levels of infrastructure (transport, green, utilities, etc) will need to be provided at the same time and there will be a cost associated with this that cannot be met by local authorities alone.
Liverpool City Council	Detailed and up to date SHLAs would need to be in place in order to ensure that land supply issues are addressed in a sustainable manner which wouldn't undermine the regeneration of the core of Liverpool City Region. A decision on the Expressions of Interest for New Growth Points in the Liverpool City Region would also need to be made by Government.
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.
Highways Agency	No comment
West Lancashire District Council	Could require Green Belt release in West Lancashire, but difficult to determine in absence of SHLAA.
Allerdale Borough Council	As with A1.2 above this option may necessitate a change to the spatial distribution in Cumbria if some Districts feel that such growth is not appropriate for them. An emphasis on RPAs may be a solution.
Emerson Group	Should be discounted.
LDNPA	Reference to the importance of local need surveys is essential to encourage local planning authorities to drill down to local level to understand need.
GVA Grimley (on behalf of Goodman)	No comments.
Taylor Young Ltd	Associated employment targets should be revised in line with this
Pendle Borough Council	A higher housing figure for Pendle could be achieved by changing the percentage split between authorities within the Central Lancashire City Region or by increasing the overall figure for the Central Lancashire City Region.

Organisation:	2. What other policy changes are required to RSS to deliver this option and why?
Cumbria County Council / Cumbria Strategic Partnership	<p>There may be implications for the spatial distribution and development emphasis given to the Key Service Centres, Local Service Centres and rural areas with Option 2.2 (i.e. Policies RDF1, RDF2), and the Spatial Principles in DP1 as well as WW3 and W5. The Overall Spatial Priorities for Cumbria (Policy CNL1) the Sub-Area Development Priorities (Policy CNL2) and the Spatial Policy for the Lake District may require reconsideration.</p> <p>It is considered highly likely that if the level of development proposed in this scenario were to be implemented, there could be problems for those LDFs already at an advanced stage of preparation, as well as those Local Plans recently adopted. Consideration might need to be given to some landscape designations, taking account of where new development is likely to take place, and the spatial distribution of new development.</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 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.</p>
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	Policies DP1, DP8, RD2, L4 and Table 7.1 on housing distribution will need to be amended.

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

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

Organisation:	3. In taking forward this option, what are the implications for:
Macclesfield BC	A) Delivery: -
	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 deliver of bypass schemes including Alderney Edge, Poynton and the Manchester Airport link road would be crucial to unlocking Green Belt sites for development.
	C) Community and social issues?
	D) Environment? The draft SHLAA indicates that increasing the level of housing provision in Macclesfield is likely to require incursions into the Green Belt.
	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.
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 later 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

Organisation:	3. In taking forward this option, what are the implications for:
	<p>Single Integrated Regional Strategy).</p> <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 Agency's response to questions 2 and 3A.</p> <p>C) Community and social issues? NC</p> <p>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.</p> <p>E) Economy? NC</p>
Bartonwillmore (on behalf of Paycause	A) Delivery: Paycause considers there is a need for Green Belt review, specifically in the Liverpool Cith Region and in particular Chester, given the dynamics of the districtk where there is a limited amount of "brownfield land" within existings settlements. It is therefore inevitable tht

Organisation:	3. In taking forward this option, what are the implications for:
<i>Ltd)</i>	there will be a need to release land beyond the existing settlement limits, but which are in sustainable locations in order to deliver the objectives of PPS1 , PPS3 and PPG13. Delivering land needs to have the willingness of landowners and in the case of our clients landholdings , their strategic site is suitable, available and achievable.
	B) Infrastructure provision? There is a need for a co-ordinated response received from all statutory undertakers in particular the Environment Agency and Drainage authorities in order that the constraint implications can be understood and future growth planned for in a proper phased and co-ordinated manner.
	C) Community and social issues? There may be the opportunity to improve existing social services and infrastructure or potentially provide further services through a comprehensive approach to making communities more sustainable through growth.
	D) Environment? There will be a need to consider the environmental implications of potential large scale release of land, and as such a balance would need to be struck to ensure suitable mitigation measures are implemented to minimise any potential adverse impacts that may arise from future development proposals.
	E) Economy? Sustainable development underpins the planning system principles and as such growth should be directed towards areas/settlements that are able to provide or able to expand employment areas, reducing the need to travel. This includes for example Chester, which as a key settlement in the Region is able to provide such a role. Therefore its potential expansion would underpin the spatial policy for the NW region in the emerging plan period.
Preston City Council	A) Delivery: In the current housing market take up in early years is likely to be slow.
	B) Infrastructure provision? Infrastructure requirements have been identified as part of the Central Lancashire/Blackpool growth point bid.
	C) Community and social issues? Increased development will create a need for additional community and social facilities e.g. doctor's surgeries that will have to be discussed with service providers at an early stage in DPD production.
	D) Environment? Sites can be identified in sustainable locations but there is likely to be increased pressure for development on greenfield sites on the urban fringe.
	E) Economy? This will create a housing led growth that will boost economic growth and fit with the development of the area's economy.

Organisation:	3. In taking forward this option, what are the implications for:
National Trust	<p>A) Delivery: Significant question marks over the ability to deliver this level of development having regard to infrastructure constraints and the capacity of the construction industry.</p>
	<p>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. (Even more necessary that with option A1.1)</p>
	<p>C) Community and social issues? No specific comments.</p>
	<p>D) Environment? Environmental capacity issues will arise with this level of potential development, not just in terms of the capacity of utilities but also in terms of the impacts upon landscapes, the historic environment and nature conservation. Formal assessment of the ability of the environment to successfully accommodate this level of development would be needed. • It will be increasingly important to ensure that new development is assessed in terms of its impact upon landscape character and the capacity of landscapes to accept change; • Opportunities need to be identified to secure enhancement of the historic environment through regeneration, whilst ensuring that valued assets, including their wider settings, are safeguarded and improved; • Development needs to ensure that it makes a positive impact upon bio-diversity both in terms of safeguarding and enhancing existing resources and providing new habitats – it is especially important that wildlife corridors are maintained and extended so as to provide better foraging areas and to enable species to migrate. The assessment and determination of new development proposals will be one of the key opportunities to ensure that other major initiatives are achieved across the Region as set out in the key Regional Strategies in respect of Climate Change and Green Infrastructure.</p>
	<p>E) Economy? It will be important to ensure that related development, e.g. allocation of employment sites, provision of commercial facilities, will be secured in an integrated approach along with the regeneration of major housing areas and where urban extensions are proposed.</p>
Blackpool Council	<p>A) Delivery: See earlier comments on the need to adjust this option to factor in the housing downturn.</p>
	<p>B) Infrastructure provision? Planning ahead by looking to 2032 is implicit in all options, with the need for infrastructure assessments to take a longer term view. On this basis, it is not considered the implications for infrastructure are a major issue. The need is to plan ahead for long term growth. Changes in the housing market may impact on the time-spans - but should not</p>

Organisation:	3. In taking forward this option, what are the implications for:
	impact on proper forward planning
	C) Community and social issues? A key consideration is the need for new affordable housing. Provision will be undermined by lower overall levels of housing – but an increase in the housing figure will make no difference, unless the market can sustain housing growth
	D) Environment? The focus of growth on the main conurbations, cities and large towns such as Blackpool is fully supported. It is a fundamental planning principle that the scale and distribution of proposed growth is consistent with the sustainable capacity of areas to accommodate it. However, in practise, when the figures are spelt out in NWRSS at district level, it is evident that the figures for many rural authorities already imply much higher levels of growth than is planned for many of the North West’s towns and cities. The increasing potential to ‘work from home’, commute, and for early retirement, combined with their natural attractiveness as a place to live are placing more development pressure on more rural locations- but runs directly counter to sustainable development principles, threatens the countryside, and to undermine the levels of growth and regeneration in areas which most need it.
	E) Economy? The main Policy RDF1 priority locations are where infrastructure and supporting facilities are concentrated, and where brownfield opportunities and regeneration needs are highest. Most professional, commercial, major industrial and service sector jobs are located in the main urban centres. The housing requirement figure needs to complement and be consistent with this. The distribution of housing must be directed to locations which support the sustainable development and regeneration of the economies of the main towns and cities. The focus of housing and jobs elsewhere should be to meet local needs, not create them.
Cheshire West and Chester (<i>comments represent informal officer views</i>)	A) Delivery: Will be very challenging, particularly given current economic conditions. In the short term, figures are unlikely to be met.
	B) Infrastructure provision? See earlier comments
	C) Community and social issues? Higher housing targets will hopefully enable Councils to secure more affordable housing.
	D) Environment? Likely to be more pressure on greenfield land. PDL target in emerging RSS may not be met. Could be opportunities to develop green infrastructure. Need to ensure high environmental standards for construction.
	E) Economy? Likely to have positive benefits - providing a good supply of homes to support

Organisation:	3. In taking forward this option, what are the implications for:
	inward investment.
Haslington Parish Council	A) Delivery: -
	B) Infrastructure provision? -
	C) Community and social issues? -
	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.
	E) Economy? -
Merseyside Policy Unit	A) Delivery: -
	B) Infrastructure provision? This option would comfortably support the delivery of potential Growth Points in the Liverpool City Region, but may actually go too far beyond that level to be considered sustainable.
	C) Community and social issues? -
	D) Environment? This option may have a negative impact on green belts, arising from the potential increase in need for housing land. We therefore sound a note of caution, and consider that draft policies emerging from this option would need to be looked at very closely.
	E) Economy? -
Warrington Borough Council	A) Delivery: This is a more ambitious programme than that already proposed and may be quite challenging when viewed in the context of the present housing market. However, the option - as with all the options -is for a set and relatively long time period during which downturns such as the present one should be averaged out.
	B) Infrastructure provision? Greater infrastructure provision required.
	C) Community and social issues? -
	D) Environment? There will be greater demand placed on land supply which may raise issues about achieving previously identified targets for reuse of brownfield land. It may also increase pressure for release of greenfield sites.
	E) Economy? Delivery of higher housing targets can have a positive effect on the economy in

Organisation:	3. In taking forward this option, what are the implications for:
	terms of employment etc. It may also require a review of the extent and location employment land.
Liverpool City Council	A) Delivery: f Liverpool becomes a growth point, it is considered that the numbers could be delivered.
	B) Infrastructure provision? The issue of infrastructure provision has been fully addressed in the NGP expressions of interest. It is considered therefore, that if this Option is adopted and the new housing supply is delivered in the growth points, then infrastructure will be provided under that programme
	C) Community and social issues? The joint Liverpool / Wirral bid for a growth point is focused in the Newheartlands Pathfinde area. New housing supply which complements this regeneration programme will support community and social infrastructure investment in the Pathfinder area.
	D) Environment? N/C
	E) Economy? The joint Liverpool / Wirral bid for a growth point is focused in the Newheartlands HMR Pathfinder area. New housing supply which complements this regeneration programme will support economic growth necessary to regenerate the Pathfinder and wider area at the core of the conurbation. Focusing new housing at this location would also complement the focus set down in Proposed Changes to Draft RSS seeking to promote regionally significant economic development near to areas of worklessness.
Lambert Smith Hampton	A) Delivery: Unable to fully comment on 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. This could be achieved through local Government levey's or S106 Agreements.
	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 of tenure and price and mix of different households, such as families, single persons and older people.
	D) Environment? Although there would be more opportunity to support the regeneration of browenfield sites across the region and improve the quality of the housing stock, development

Organisation:	3. In taking forward this option, what are the implications for:
	<p>would tend to be either skewed towards every bit of urban land within the Manchester and Liverpool City Regions with an inappropriate density related to the infrastructure and services available, or expand out the boundaries of the City regions in which instance development would be moved away from the Central Core areas contrary to the spatial distribution objectives.</p> <p>E) Economy? Investment will be encouraged into the City Region areas. However, investment may not be encouraged to other areas of the region.</p>
Highways Agency	<p>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).</p> <p>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</p> <p>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.</p> <p>D) Environment? Additional or lengthier transport trips arising from this level of housing provision may have implications for noise levels, air quality and environmental resources - such as landscape and bio-diversity.</p> <p>E) Economy? Growing congestion on the road network arising from an increasing number and length of car-based commuting trips may frustrate achievement of economic growth forecasts. The opportunity to secure funds from the Community Infrastructure Levy and Community Infrastructure Fund should be explored.</p>
West Lancashire District Council	<p>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. Site situation difficult to ascertain at present due to no SHLAA.</p> <p>B) Infrastructure provision? Unknown in absence of infrastructure assessments.</p>

Organisation:	3. In taking forward this option, what are the implications for:
	C) Community and social issues? Unknown
	D) Environment? Difficult to determine in absence of SHLAA.
	E) Economy? Unknown
Allerdale Borough Council	A) Delivery: Historically, at least on an annual basis, this level of growth has been delivered in Allerdale in the 1990s. It is considered that this level of growth is generally deliverable. Delivery of affordable housing in the context of existing funding and implementation processes remains doubtful no matter what overall housing target is chosen. We have a 5 year supply compared with such a target, ie. based on current numbers distribution, (as long as it is not "backdated").
	B) Infrastructure provision? Should only be local problems which would be addressed in our LDF distributional options.
	C) Community and social issues? As above (affordable housing)
	D) Environment? This level of growth should not raise insuperable environmental problems.
	E) Economy? This option will allow Allerdale's LDF to encompass the aspirations of economic strategies. Whilst it could not encompass the most aspirational scenarios of such strategies it will allow us to make modest provision and then "wait and see".
Emerson Group	A) Delivery: There would have to be a staged recovery in delivery figures. Thereafter the recovery in confidence in the housing market and the increasing capability of the house building industry to provide the homes should meet this figure.
	B) Infrastructure provision? There would have to be some reconsideration of the phasing and extent of infrastructure provision for what would be a 15% increase in net new dwellings each year over the existing figures.
	C) Community and social issues? See B) above
	D) Environment? Uncertain outcome though increased use of brownfield sites should lead to environmental improvements.
	E) Economy? Would need to adjust to the potential household increases and patterns of development
LDNPA	A) Delivery: land acquisition build costs grant per unit etc

Organisation:	3. In taking forward this option, what are the implications for:
	<p>B) Infrastructure provision? Implications on highway, waste, sewerage systems, service providers, waste provision, flooding etc/ Resource intensive, not necessarily supported by relevant Government funding or aspiration.</p> <p>C) Community and social issues? Increase in house building in rural areas is to be supported in principle it will help to support and maintain vibrant communities.</p> <p>D) Environment? We should not support new build at all costs, especially not at the expense of damaging our fragile environment. We should be encouraging a more effective and efficient way of utilising existing housing stock. The government must appreciate that we cannot build our way out of this housing problem. we need to be more intelligent on our approach to housing provision. Policies need to reflect this.</p> <p>E) Economy? Retaining local people to support local businesses is to be supported. Development in appropriate areas helps to reduce the reliance on the private motor car.</p>
GVA Grimley (<i>on behalf of Goodman</i>)	<p>A) Delivery: Delivery will remain limited with these housing numbers.</p> <p>B) Infrastructure provision? Infrastructure will be planned for but will not allow for maximum levels of new development.</p> <p>C) Community and social issues? It is likely that there will be a demand for further housing during the plan period and this could lead to a lack of housing for some groups, and a lack of associated community facilities.</p> <p>D) Environment? The environment may be affected later on by a sudden demand to build more new homes which have not been planned for within RSS and this could have a detrimental effect on the environment. Planning for this development in advance will help to mitigate these problems.</p> <p>E) Economy? The Region will be better equipped to support future economic growth if housing numbers are increased to the levels proposed within this option, however there is greater potential to be released if housing figures were higher.</p>
Wirral MBC	<p>A) Delivery: Delivery would depend on the Growth Point submission for Liverpool/Wirral being accepted</p> <p>B) Infrastructure provision? Delivery would depend on the Growth Point submission for Liverpool/Wirral being accepted</p>

Organisation:	3. In taking forward this option, what are the implications for:
	C) Community and social issues? -
	D) Environment? -
	E) Economy? -
Cumbria County Council / Cumbria Strategic Partnership	A) Delivery: Given the previous historic rates of planning permissions and completions, it is envisaged that these figures would not be likely to result in an unmanageable increase in growth. The concerns relating to the Housing Corporation funding of affordable housing delivery remain. However, the increase will offer greater flexibility for delivery through the allocation of sites and the potential for cross subsidy with open market housing through S106 agreements.
	B) Infrastructure provision? It is considered likely that LDF Core Strategies and other strategies would be able to broadly accommodate this level of housing growth around existing emerging RSS Policies, although there will be implications for those LDF Core Strategies currently being completed, such as Eden District, South Lakeland District and the LDNPA. The most significant proportionate increase is likely to be for Carlisle District, and consideration would need to be given to where this level of development might be appropriately accommodated, taking into account environmental impacts upon the character of settlements, range of existing infrastructure facilities, and current natural environmental designations. The Carlisle Local Plan is in the final stages of adoption, and there might be implications for planning for this level of housing growth. Again, the proportions of development amongst the Districts might need to be amended to better reflect local circumstances.
	C) Community and social issues? As above
	D) Environment? Consideration must be given to the effects of new development upon the character of existing settlements, and their surrounding landscapes, natural habitats and their settings.
	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. However, any housing growth must be planned alongside expected economic growth and

Organisation:	3. In taking forward this option, what are the implications for:
	identified employment needs, as well as taking proper account of impacts upon local infrastructure.
<i>on behalf of</i> Persimmon Homes (Lancashire) Limited and Prime Resorts Limited.	A) Delivery: See response to Question A1.1 Point 3 above.
	B) Infrastructure provision? This will have a positive impact on infrastructure, as developers of additional dwellings will be required to provide the appropriate levels of infrastructure (including upgrading existing infrastructure, which usually benefits more than the proposed development's users) to meet the requirements.
	C) Community and social issues? This will assist in addressing affordability and therefore social inclusion.
	D) Environment? The environment will need to be balanced against this and, as such, preference should always be placed on previously developed land. We therefore propose that Policy DP1 be amended to ensure that all suitable and sustainable previously developed land, both within urban areas and outside, come forward before green field and Green Belt land. We request that Policy DP1 be amended to reflect this in accordance with adjustments to the housing provision.
	E) Economy? We consider that the economy will benefit from increased housing provision, as increased house building will undoubtedly increase the number of jobs and, indirectly, addressing affordability issues, particularly in Central Lancashire, will assist in attracting skilled workers, which is needed to increase economic output to a level closer to that of the rest of the UK.