

Cheshire West and Chester Local Plan

Issues and Options (Regulation 18) Consultation

Prepared by Fisher German LLP on behalf of
Heat Pumps Directors' Pension Fund

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1. Introduction

- 1.1. These representations have been prepared by Fisher German LLP on behalf of Heat Pumps Directors' Pension Fund, in respect of the Cheshire West and Chester Council's Issues and Options (Regulation 18) consultation and their land interests.
- 1.2. The sites had been submitted to the Council during their most recent Call for Sites exercise carried out in 2024. The focus of these representations is to engage with the emerging plan and provide constructive input to aid its development.

2. Adopted Local Plan

- 2.1. The current review of Cheshire West and Chester local plan is welcomed, particularly considering the requirement under paragraph 33 of the National Planning Policy Framework (NPPF) to review plans at least every five years. This review provides a critical opportunity to evaluate the performance of the adopted plan against key planning objectives.
- 2.2. While the adopted Local Plan (Part One: Strategic Policies, 2015 and Part Two: Land Allocations and Detailed Policies, 2019) has provided a degree of policy certainty, it is increasingly apparent that aspects of the Plan are now dated. There are obvious signs that the spatial strategy and some of the supporting policies may no longer be fully aligned with current national policy, particularly with regards to housing delivery and economic flexibility.
- 2.3. The current spatial strategy is overly reliant on a limited number of strategic allocations, many of which face complex infrastructure and viability challenges. This has introduced risk into the delivery trajectory and has limited the ability of the plan to respond flexibly to changing circumstances. A more diversified and deliverable land supply is now required, including a broader distribution of medium-sized sites, as encouraged by paragraph 69 of the NPPF.
- 2.4. A key part of the Local Plan review must be a reassessment of how housing delivery can better reflect the borough's diverse and evolving needs. Many existing allocations focus on uniform housing types, often at lower densities. A renewed focus is needed on the delivery of mixed housing developments that integrate a variety of tenures, types, and price points. This includes homes for market sale, affordable housing, homes for rent. Supporting a broader range of households is not only a matter of social equity, but also essential to building resilient, long-term communities.
- 2.5. Mixed housing developments are also more likely to be deliverable and responsive to market signals, especially where they include a balance of housing types that appeal to different sectors of the population. Allocations should therefore prioritise locations that can support this mixed approach particularly well-located sites.
- 2.6. Delivering homes in a mix of tenures and formats within a single site also enables the creation of walkable, 20-minute neighbourhoods that reduce car dependency, support local services, and align with the borough's environmental and place-making ambitions.
- 2.7. In reviewing the spatial strategy, there is a critical opportunity to direct growth to those locations that can offer integrated housing delivery, combining, accessibility, and high design standards. This includes not only large-scale developments, but also medium-sized sites capable of prompt delivery and of delivering meaningful housing mix at a community scale.

Spatial Strategy

- 2.8. The overall aim to promote sustainable development across Cheshire West and Chester is strongly supported. The revised NPPF (December 2024) and updated Standard Method have significantly increased the borough's Local Housing Need, from around 374 to 865 dwellings per annum, necessitating additional residential allocations.
- 2.9. The Council's spatial options, particularly those promoting growth in sustainable, well-connected locations, provide a logical framework for meeting this demand. A clear strategy that aligns housing with employment opportunities, infrastructure, and transport accessibility will be essential to delivering a balanced and deliverable Local Plan.

SS 1: Is there any reason for the council not to plan for delivering a minimum of 1,914 new homes each year?

- 2.10. There is no reason the Council should not plan to deliver a minimum of 1,914 new homes each year. Planning for this level of growth is necessary to address affordability pressures, support economic

development, and ensure a steady supply of housing land across the borough. A proactive response will help maintain a five-year housing land supply and ensure the Local Plan is found sound at examination.

SS 2: Should the Council Consider a Stepped Housing Requirement with Lower Early Delivery?

- 2.11. Stepped housing may reflect practical delivery challenges, particularly in the early years, however it risks delaying the supply of much-needed homes in areas experiencing acute affordability pressures. Given the identified need and market signals, the Council should avoid under-delivery in the early plan period, instead supporting early phases of development in growth areas such as Cuddington where land is available, sustainably located, and benefitting from early developer interest.
- 2.12. A stepped approach is typically adopted when there are significant changes in housing requirements, however this trajectory raises fundamental soundness issues. It can be a risky approach that would not deliver sufficient homes early enough to counter and can be arguably contrary to government policy to boost the supply of housing. It is instead worth identifying additional sources of housing delivery in the early years of the plan period.
- 2.13. The parcel we are promoting have the potential to come forward in the early years of the plan period. Delaying these sites would risk underutilising some of the most deliverable and strategically aligned locations in the borough.

SS 4: Do You Agree with the Suggested Policy Approach Towards the Spatial Strategy Principles?

- 2.14. The spatial principles present a broadly balanced approach, appropriately focusing growth in urban areas and key service centres. However, greater emphasis is needed on the deliverability of housing sites in strategic locations. The strategy should also offer clearer guidance on the timely delivery of supporting infrastructure, particularly transport and community facilities, to enable sustainable growth and minimise the need for Green Belt release where possible.

SS 5: Do You Agree with the Suggested Policy Approach Towards the Settlement Hierarchy?

- 2.15. The proposed settlement hierarchy provides a useful framework for directing growth. Continuing prioritisation of settlements like Chester, Northwich, and Winsford as key service centres is supported as they carry consistent potential for significant housing and employment expansion. Even so, it is still important that the hierarchy remains flexible enough to support growth in emerging areas, such as Cuddington, to reflect local market demand and infrastructure. Additionally, the strategy should promote mixed-use development in these settlements to foster vibrant and sustainable communities.

SS 7: Do you think the new Local Plan should contain place-based policies for smaller settlements such as: Cuddington and Sandiway; Farnon; Helsby; Kelsall; Malpas; Tarporley; Tattenhall; and Tarvin?

- 2.16. The new Local Plan should include place-based policies for key rural settlements such as Cuddington. As a designated Key Service Centre, Cuddington possesses a distinct identity, supported by a variety of local services and facilities that serve both the village and surrounding rural communities. The village benefits from a strong community spirit, a well-defined historic core, and a clear village character that should be preserved and enhanced through tailored planning policies.
- 2.17. Place-based policies for Cuddington would ensure that housing growth is appropriate and sustainable, balancing the need for new homes with the preservation of local character and setting, particularly within and near the Conservation Area. Such policies can deliver wider community benefits, including improved access to open spaces, enhanced connectivity through transport links and public amenities, and development that complements the existing settlement pattern. This approach presents a valuable opportunity to provide housing that meets local needs while contributing positively to the long-term vitality and resilience of the community.

SS 8: Do you agree that in smaller settlements, the character should be protected, and development should not exceed the capacity of existing services and infrastructure?

- 2.18. It is agreed that the character of smaller settlements should be respected, and that development must be appropriately aligned with the capacity of existing services and infrastructure. However, this principle should not be interpreted as a blanket restriction on growth, particularly where there are opportunities to deliver sustainable development alongside infrastructure improvements.
- 2.19. A balanced approach would enable appropriate levels of development in these locations, while requiring contributions to infrastructure and services as necessary, this ensures settlements can grow sustainably and inclusively.
- 2.20. Cuddington, as a Key Service Centre, is well positioned to accommodate proportionate, plan-led growth that addresses both local and borough-wide housing needs. With appropriate investment and a supportive planning framework, Cuddington can grow in a manner that respects its unique local character while enhancing community resilience, sustaining vital services, and ensuring long-term sustainability.

SS 11: Please select the option which is the most appropriate spatial strategy for Cheshire West and Chester:

- 2.21. Our preferred spatial approach is Option B, which offers the greatest potential to distribute growth more evenly across the borough, unlocking early deliverable housing aligned with existing infrastructure capacity and market interest. It avoids the over-reliance on constrained urban areas seen in Option A, while also mitigating the environmental and delivery risks associated with large-scale Green Belt release under Option C.
- 2.22. Option B provides the flexibility to respond to local needs while maintaining a clear plan-led strategy, ensuring that growth is directed to sustainable, deliverable locations. There is secondary support for Option A, recognising its value in promoting brownfield regeneration and urban intensification, though it is unlikely to accommodate the full scale of growth required, particularly for employment land and a diverse housing mix, given urban capacity, and viability limitations.
- 2.23. Option C is not supported as a primary strategy, as new settlements and significant Green Belt release would introduce major delivery risks, particularly in the early part of the plan period. It is recommended that the Council adopts Option B as the core spatial strategy, complemented by appropriate elements of Option A where urban opportunities exist, ensuring growth is phased, flexible, and well-integrated with infrastructure and community support, particularly in locations such as Cuddington and Northwich

3. Representations

Site One: Land at Forest Road, Cuddington

- 3.1. Section 5.1 of the Issues and Options consultation invites comments on spatial growth and future housing land availability across the borough. This representation relates to a site at Forest Road, Cuddington which, is now being actively promoted in light of updated evidence, adjacent development, and the borough's increasing housing need.
- 3.2. This site, identified as CUD04, is included within the growth boundaries of both Option B and Option C for housing allocation in the Council's emerging spatial strategy. The Council has acknowledged this land as a key component of its planned residential growth, reflecting its commitment to meeting future housing needs within Cuddington and the wider borough.

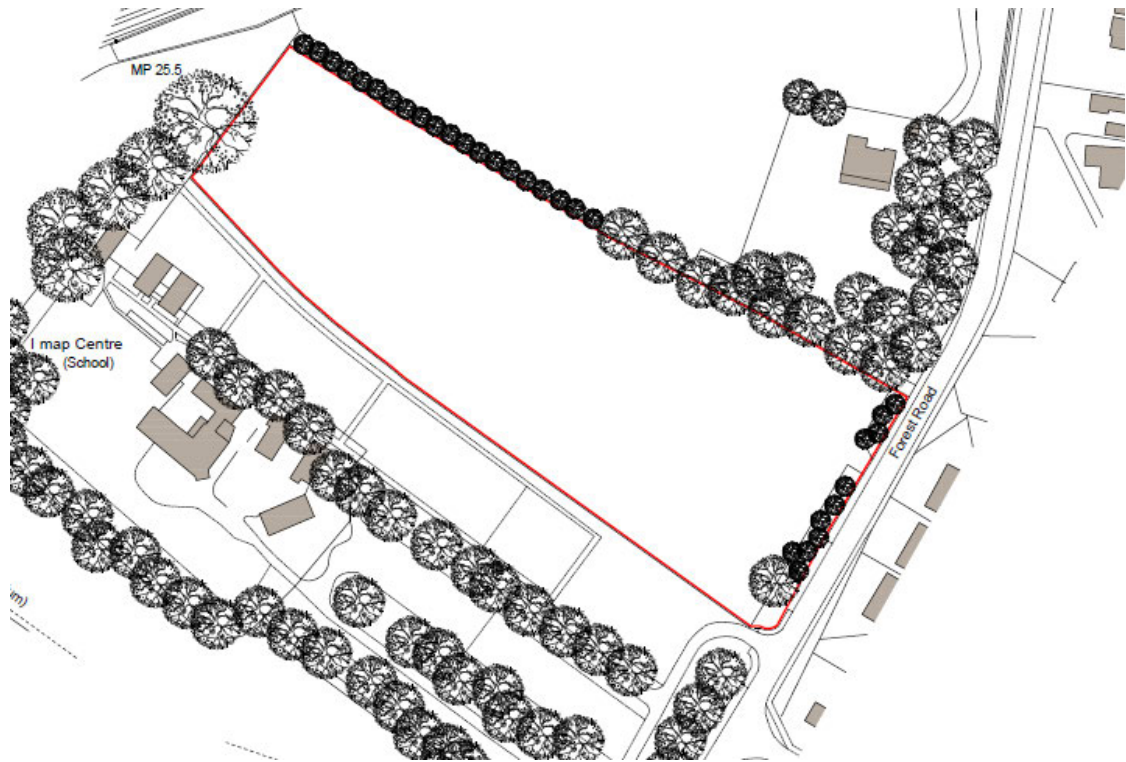


Figure 1. Land at Forest Road, Cuddington (2025).

- 3.3. The site comprises approximately 4.5 acres of Green Belt land, located to the east of the A49 (Forest Road) and directly adjacent to the Chester - Manchester railway line, which defines the site's northwestern boundary. Beyond the railway lies established residential development. The site presents a logical and sustainable extension to the existing settlement and is capable of delivery within the early years of the plan period.
- 3.4. Although current designated as Green Belt and open countryside, the site well contains, lying on the edge of the built-up area and encircled on three sides by existing development. Its release would constitute a logical rounding-off of the settlement and would not lead to the unrestricted sprawl of the urban area. The site has been assessed against the five purposes of the Green Belt and is considered to make a limited contribution, particularly when compared with more sensitive parcels elsewhere in the borough.
- 3.5. The site lies within the combined settlement of Cuddington and Sandiway, a key service centre with a population of 4,430 (2011 Census). The area benefits from a wide range of local services and amenities within walking distance of the site.
- 3.6. The site is exceptionally well-connected, being within walking distance of the Cuddington railway station, served by local bus routes on the A49 and has a public footpath FP16 which runs along the site's southwestern boundary, enhancing pedestrian connectivity. The land is five miles southwest of Northwich, fourteen miles from Knutsford and Chester, and around thirty miles from Manchester. Its release would therefore not contribute to urban sprawl or coalescence and would not undermine the wider function of the Green Belt. Instead, it would represent a proportionate and planned extension to the village.
- 3.7. From a technical perspective, the site is free from significant constraints. It lies outside areas of flood risk, is not affected by ecological designations, and has no Tree Preservation Orders (TPOs). While located in the Green Belt, its development would represent a modest and proportionate release of

land that is already tightly integrated with the existing urban fabric. This would help safeguard more sensitive or strategically important Green Belt land elsewhere.

- 3.8. The original Beechfield structure on the neighbouring parcel of land beside the site was locally listed; however, since its demolition and replacement with a rehabilitation centre, the current building is not locally listed. There are no statutorily listed buildings or designated heritage assets within or immediately adjacent to the site, and any nearby heritage features can be appropriately respected through design and layout.
- 3.9. Importantly, the development of this site would not result in the merger of distinct settlements. Cuddington and Sandiway already operate as a single, cohesive community with shared infrastructure and services. Development here would therefore reinforce the existing settlement pattern, not undermine it.
- 3.10. In summary, the site represents a highly sustainable, well-connected, and deliverable opportunity for residential development. It can contribute significantly to the borough's housing land supply and can come forward early in the plan period. The site's characteristics and location make it a strong candidate for Green Belt release, aligning with national and local planning policy objectives.

Site specific comments to support Cuddington Growth Options (Section 5.1)

- 3.11. This representation responds to Section 5.1 of the Issues and Options consultation, which seeks views on spatial growth and housing land availability across Cheshire West and Chester. Our focus is on potential growth options around Cuddington and Sandiway, specifically site CUD04, which is included within growth options B and C.
- 3.12. CUD04 offers a sustainable, deliverable and strategically located opportunity for residential development that aligns with the Council's emerging housing needs. The site provides a logical extension to the existing settlement, benefiting from strong local amenities, transport links, and a clear potential to contribute positively to meeting the borough's housing targets.
- 3.13. The following responses provide detailed comments supporting the suitability of CUD04 and highlight key considerations for its inclusion in the new Local Plan.

SS 35: Which of the identified potential growth areas around Cuddington and Sandiway do you consider to be the most suitable?

- 3.14. CUD04, which is included within both Option B and C growth approaches, represents a highly suitable and sustainable opportunity for residential development in Cuddington. Its location adjacent to existing built-up areas offers a logical and coherent extension to the settlement, supporting the borough's housing needs in a deliverable and timely manner.
- 3.15. The site's accessibility to key services and sustainable transport links aligns with paragraphs 82 and 83 of the NPPF, which encourages housing development in villages and rural areas where it contributes to sustainable development patterns. Furthermore, the site's scale allows for phased delivery, supporting early contributions to the borough's five-year housing land supply.

SS 36: Do you have any further comments about any of the potential growth areas identified around Cuddington and Sandiway?

- 3.16. The Council's recognition of multiple growth options around Cuddington and Sandiway is welcomed; however, site CUD04 is highlighted as a well contained location with strong access to local services and transport infrastructure. Its proximity to facilities and amenities further supports its suitability for housing development.

- 3.17. A carefully considered release of Green Belt land to meet objectively assessed housing needs is justified where it creates a sustainable and clearly defined boundary that complements the existing urban area.
- 3.18. The site's excellent access to public transport and local amenities aligns with the Council's goals for sustainable growth and fostering healthy communities, in accordance with Paragraph 96 of the NPPF (2024). Development here would help reduce reliance on private vehicles and support greater social inclusion.

SS 37: Are there any constraints, including infrastructure provision, that should be considered for Cuddington and Sandiway when developing the new Local Plan?

- 3.19. The site located within CUD04 is largely free from significant physical or environmental constraints, lying outside of flood risk zones, ecological designations and TPOs.
- 3.20. While the site is currently designated as Green Belt and countryside, its release is considered appropriate to meet identified housing needs, provided that development respects local character and follows sustainable planning principles.
- 3.21. No major infrastructure barriers have been identified that would impede the timely delivery of development on this site. Coordinated investment and planning can ensure that the site integrates effectively with existing communities and services.

4. Other Policy Considerations

HO 1: Do you agree with the suggested policy approach towards mix and type and specialist housing in new developments, as set out in HO 1 'Mix and type of housing in new developments and specialist housing' above? If not, please suggest how it could be amended?

- 4.1. The suggested policy approach towards housing mix, type, and specialist housing is broadly supported as it recognises the need for diverse, inclusive communities that meet varied demographic and social requirements. However, flexibility should be embedded within the policy to respond to local market conditions and site-specific constraints. Provision for specialist housing should be carefully calibrated to ensure it meets demonstrated local need without imposing unrealistic percentage targets that could hinder delivery. The policy should also emphasise the integration of specialist housing within mainstream developments to promote social cohesion and accessibility.
- 4.2. Given Cuddington's demographic profile, with a considerable proportion of older residents and young families, the policy should encourage a mix that includes accessible, adaptable homes and affordable family housing alongside specialist housing.

HO 2: Should the housing mix and type and specialist housing be delivered through a percentage policy approach that sets requirements for each category of housing?

- 4.3. While percentage-based targets can offer clarity and help guide development in line with identified housing needs, a rigid or overly prescriptive approach may not be appropriate across all sites or settlement types. A more flexible framework is recommended, one that sets indicative targets informed by the Housing Needs Assessment but allows for site-specific negotiation based on local needs, site constraints, and viability. Housing needs evolve over time, and a prescriptive approach might not accommodate these changes effectively.
- 4.4. This flexible approach would enable the Local Plan to respond more effectively to changing demographic trends, local market conditions, and the unique character of individual settlements, particularly in rural areas like Cuddington. The policy should encourage a balanced housing mix that reflects both borough-wide strategic objectives and local community aspirations.

OS 2: Are the current thresholds for developer contributions for open space and playing pitches suitable, or do you have any comments or suggestions for what they should be?

- 4.5. The current thresholds for developer contributions towards open space and playing pitches provide a sound basis for securing community infrastructure. However, considering the growing emphasis on health, wellbeing, and biodiversity, as reinforced in the NPPF (2024), consideration should be given to lowering thresholds in specific contexts to address cumulative impacts, particularly in smaller or phased developments. Contributions should be clearly linked to up-to-date local evidence, including the Playing Pitch Strategy and Sport England’s planning tools, to ensure funding supports accessible and valued improvements.

OS 5: Do you agree with the suggested policy approach towards cultural and community facilities, as set out in OS 2 ‘Cultural and community facilities’ above? If not, please suggest how it could be amended?

- 4.6. The proposed policy approach to protecting and enhancing cultural and community facilities is strongly supported, as these assets are essential to the long-term vibrancy and inclusivity of local communities. The policy should go further by encouraging the proactive delivery of new or enhanced facilities as part of major developments, secured through developer contributions where appropriate.
- 4.7. In addition, promoting the flexible and multi-use operation of existing facilities will allow them to respond more effectively to evolving community needs, helping to improve social resilience. Ongoing engagement with local stakeholders and community organisations will be key to ensuring the policy remains responsive and effective.
- 4.8. Facilities such as the local village halls, libraries, and sports clubs are vital to Cuddington’s community fabric and should be safeguarded and enhanced, with new development helping to support these through appropriate contributions and design.

5. Assessment and Conclusion

- 5.1. This representation supports a revised spatial strategy for Cheshire West and Chester that promotes a more balanced, deliverable, and flexible approach to growth across the borough. The Council must plan positively to meet the significantly increased housing needs arising from the revised NPPF.
- 5.2. We support Spatial Option B as the most appropriate basis for the new Local Plan, offering a sustainable and well-distributed pattern of growth that avoids over-reliance on constrained urban sites or major Green Belt release. Within this framework, Cuddington is well placed to accommodate planned development as a designated Key Service Centre with strong infrastructure, local services, and public transport links.
- 5.3. Site CUD04 represents a clear opportunity for sustainable residential development in the early years of the plan period. It is well contained, free from major constraints, and benefits from excellent accessibility and integration with the existing settlement. The site has been assessed as suitable through the Issues and Options consultation and aligns closely with national policy in terms of Green Belt review and sustainable settlement expansion.
- 5.4. The site is available, achievable, and deliverable, with landowner support and clear potential to contribute to the borough’s five-year housing land supply. Its modest scale and logical boundaries make it a strong candidate for Green Belt release, offering prompt delivery without compromising the wider strategic objectives of the Plan.
- 5.5. We encourage the Council to give full and positive consideration to CUD04 for allocation in the emerging Local Plan and to develop a spatial strategy that supports sustainable growth in settlements like Cuddington. This will help ensure the Plan is sound, responsive to market needs, and capable of delivering the borough’s housing requirements over the full plan period.