

Planning Policy,
Cheshire West and Chester Council,
The Portal,
Wellington Road,
Ellesmere Port,
CH65 0BA

Sent via email only to: planningpolicy@cheshirewestandchester.gov.uk

1st September 2025

Dear Sir/Madam,

Response to the Regulation 18 Public Consultation in Respect of the Proposed Local Plan Issues and Options

Hayley Knight Planning Limited, on behalf of Central & Country Developments Ltd, hereby submit the comments set out in this letter in response to the proposed Cheshire West and Chester Local Plan Issues and Options (Regulation 18) consultation.

Introduction

Central & Country Developments Ltd are an SME property developer with a dedicated “in house” building contractor, Central & Country Construction Ltd. Over the past 20 years they have completed over 310 affordable houses for various Registered Providers including Housing Plus Group, Bromford, Walsall Housing Group. Their residential developments comprise of a range of schemes from barn conversions to new housing schemes, both for the open mark but mainly for 100% affordable tenures. These representations are made with specific consideration to a site that Central & Country Developments Ltd own freehold. This is located off Forest Road in Cuddington, immediately adjacent to the heart of Cuddington. A title plans identifying this parcel of land is included as an enclosure to this letter.

For ease of reference this letter sets out the comments in response to each of the questions set out in the Issues and Options (Regulation 18) document, where they apply. Comments are only provided in response to the questions that we consider our input is required.



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Response to the Local Plan Issues and Options (Regulation 18) Consultation

Question IN 2 Do you have any comments on what the monitoring framework should include?

The monitoring framework should reflect the policies that are contained within the final Local Plan. Based on the current Local Plan and the Issues and Options set out in this consultation the monitoring framework should therefore potentially include:

- Housing delivery per settlement;
- Housing delivery per policy requirement (house type and tenure etc.); and
- Housing delivery in relation to any set restriction or limitation (amount or percentage of housing on previously developed land, open countryside or Green Belt).

Question IN 6 Do you have any comments on what role Neighbourhood Plans should play in terms of meeting Cheshire West's development needs and other suggested policy approaches for the new Local Plan? This could include things like meeting housing needs, local connection tests, or design etc.

The emerging Local Plan housing needs figures show a step change in the amount of housing that needs to be delivered across the Borough over the Local Plan period. This will inevitably require all of the key settlements in the Borough to accommodate some new residential homes.

The currently adopted Cuddington and Sandiway Neighbourhood Plan reflect the current Local Plan settlement boundary for the settlement, which is tightly drawn around the urban area of the village together with accompanying policies restricting development outside of the settlement boundary. If development is restricted in line with the Neighbourhood Plan this would not allow for any new development of scale, other than affordable homes around Cuddington and Sandiway. Two of the three options put forward for the emerging Local Plan will lead to new development of scale being allocated to Cuddington and Sandiway, as such it is likely that the settlement will be subject to new development that spans beyond the current settlement boundaries. In cases such as these, the emerging Local Plan (once adopted) should supersede any Neighbourhood Plan policies that do not comply with the Local Plan. This should be set out in Local Plan Policy wording.

A significant aim of National Planning Policy Framework (NPPF) is that Small and Medium Enterprise (SME) housebuilders should be supported because typically they deliver small and medium sized sites that are often built out relatively quickly. Ultimately it is clear that the Government recognise that supporting SMEs helps to diversify the housing supply, provide competition and innovation, and foster organic growth within communities. The NPPF promotes this by encouraging local authorities to allocate a portion of their housing requirement to smaller sites, and by providing tools and support to help SMEs bring these sites forward more quickly. It is noted that the Neighbourhood Plan does allow for 'small-scale' residential developments, albeit this is not defined. This should continue to be reflected in emerging alterations to Neighbourhood Plans during the Local Plan review and the site put forward reflect the aim of supporting SMEs by its virtue of its scale and ownership.



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Question VI 1 Do you agree with the suggested approach towards the new Local Plan vision, as set out in VI 1 'Vision' above? If not please suggest how it could be

The fourth aim 'Protecting the Character' gives off significant tones of restricting change. Significant development to support the rural economy and villages will be required over the plan period. This aim should be altered to reflect that high quality development is needed during the Plan period to 'Support the Character' of the rural area.

Question VI2 Should the vision include/establish a set of principles and priorities? Are these the right tones – do you have any other suggestions?

The Government has recognised there is a national housing crisis and the increased provision of suitable housing opportunities, including affordable and private homes, across the borough must be considered a key aim of 'promoting well-being'.

Question VI 3 Do you agree with the approach of establishing concise visions for the key places identified in the new Local Plan? Or do you have an alternative suggestion?

Key Service Centres currently accommodate approximately 1/6 of the residential development needs in the adopted Local Plan. In order to support and sustain the services in these centres then a similar proportion of the proposed housing numbers must be allocated to them. If not, other areas will grow faster to the detriment of the Key Service Centres, with services and facilities in these centres such as retail, health and education likely to move to other areas causing a loss of services in these centres over the Plan period.

Overall we support the need for concise visions for the key places, but that this needs to include Key Service Centres in the rural area as otherwise their importance may not be reflected in the emerging Plan.

Question OB 4 Do you think that objectives SO1, SO3, SO9, SO10 need to be amended if they are to be taken forward into the new Local Plan? Do you have any suggestions for how they should be amended?

SO9 and SO10 would need to be accompanied by updated settlement boundaries to take account of new development needed for the next Plan Period and retain flexibility for delivery if housing numbers are not being achieved.

Question OB 5 Do you feel that the option of using the Sustainability Appraisal objectives in the new Local Plan, as set out in Option B 'Use the Sustainability Appraisal objectives' above, is an appropriate approach?

The SA objectives do appear to cover a suitably wide range of social, environmental, and economic issues (e.g., climate change, health, housing, historic environment, transport). This breadth helps ensure the Local Plan's policies are tested against appropriate outcomes.

Question OB 6 If you do not feel this is an appropriate approach, are there any changes that you could suggest?

Plan Objectives set out in the existing Local Plan and SA are very similar- the main difference is the locational policies i.e. SO1, SO3, SO9 and SO10. Regardless the settlement boundaries will need to be revised to accommodate any of these objectives.



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Question SD1 Do you agree with the suggested policy approach towards sustainable development, as set out in SD1 'Sustainable development' above? If not please suggest how it could be amended?

A tail piece should be added to 'avoid development in locations of high environmental value and on high grade agricultural land' that reads 'unless allocated in the Local Plan' as these are expected to be factors considered in allocating land for development, and should not have be re-iterated at application stage.

Question SS2 Do you think the Council should consider a stepped housing requirement that plans for a lower level of housing delivery earlier in the plan period?

The Government has issued many statements recognising there is a national housing crisis, and has updated the NPPF and increased housing requirements to reflect this. Therefore, it seems inconceivable why a reduced supply of housing land would be suggested in the early years of a new Local Plan. Please see Enclosure 2, a letter from The Ministry for Housing, Communities and Local Government dated 18th August confirming 'All areas of the country must play their part in building the homes we need'.

In all likelihood given the Council's current position (and time it will take to get the Local Plan adopted) inevitably there will be a lower amount of development delivered in the early years of an emerging plan. In order to avoid a lag in delivery and actually achieve the Government aims of addressing the housing crisis, rather than defer them, Sites which are relatively unconstrained, well located to existing settlements and not of such a scale to cause significant issues on local infrastructure should be considered for release ahead of the emerging Local Plan adoption.

Overall phasing delivery of Housing may be required, but if proposed such policies should not stifle potential early delivery of housing in the Local plan period. Any phasing policies for the delivery of housing must remain extremely flexible as delivery of the likely required large-scale sites will need large infrastructure inputs, alterations and complex Section 106 agreements, and these have historically been shown to take significant time to come forward. Therefore, it would only seem appropriate to phase large scale allocations rather than smaller ones which again meet the NPPF's aim for SMEs and small-medium sites that can typically be delivered quicker.

Question SS4 Do you agree with the suggested policy approach towards the spatial strategy principles, as set out in SS3 'Spatial strategy principles' above? If not please suggest how it could be amended?

We are generally agreeable to this approach, but final Policy wording needs to accept that it is inevitable that settlements will need to expand to accommodate the requisite level of development to meet the needs of the Borough over the plan period.

Question SS5 Do you agree with the suggested policy approach towards the settlement hierarchy, as set out in SS 4 'Settlement hierarchy' above? If not please suggest how it could be amended?

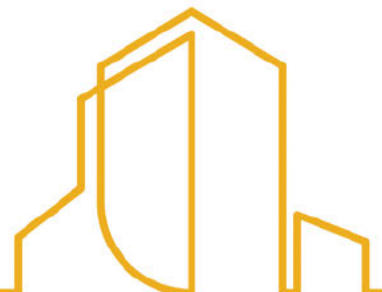
Yes- this aligns with the Sustainability Appraisal.

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

Yes, place-based policies for the current Key Service Centre would be appropriate as these settlements currently



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accommodate approximately 1/6 of the residential development of the Borough over the current plan period, and therefore an element of place based policies should apply.

We note that Option B for the emerging Local Plan is to follow current Local Plan levels and distribution of development. However, this would appear to be incorrect when looking at the proportional increase in housing numbers as applied in the Issues and Options document. Accordingly, 4,000 homes as a minimum should be allocated to these smaller settlements in order that they remain on the same level of growth as the rest of the Borough, and don't become disadvantaged compared with other areas.

Question SS9 Have circumstances changed since the adoption of the Local Plan (Part One), that would now justify Green Belt release?

Yes, since 2015 the Government have significantly increased the housing requirement for Cheshire West and Chester and also relaxed Green Belt policy through the NPPF. Initially this included the development of previously developed land in the Green Belt as being appropriate, and more recently relaxation of Green Belt policy Nationally has included the definition of 'Grey Belt' land¹. NPPF paragraph 148 is clear that Local Authorities should give priority to previously developed land in the Green Belt, then Grey Belt land that is previously undeveloped, and then other Green Belt locations in allocating land in Local Plans, where Green Belt release is necessary.

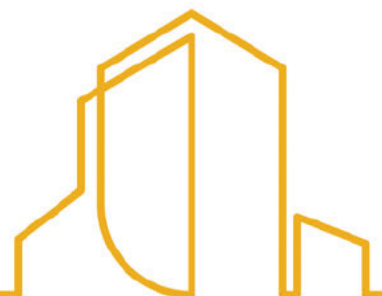
It is considered that there are many previously developed sites and Grey Belt sites in the North Cheshire Green Belt that are in sustainable locations for new development, and merit consideration for allocation in the emerging Local Plan so as to meet the housing need over the emerging plan period. This is particularly in the context of the last Local Plan, which in 2015 was subject to a Green Belt Study that only considered Green Belt release immediately adjacent to the settlement boundary of Chester, and did not consider the rest of the Borough. Ultimately given the high housing need, lack of sites to accommodate the homes needed, lack of an up-date comprehensive assessment of the North Cheshire Green Belt and relaxation of Green Belt policy Nationally a holistic review of the Green Belt is needed to inform the emerging Local Plan so as to identify suitable sites for growth.

The proposed allocation of 11,000 no. homes in the Green Belt in Option B of the emerging Local Plan should not however pre-empt the required Green Belt review study and potential release of Green Belt land. The review must be the other way around and identify the sites / areas which no longer fulfil the purposes of Green Belt and be reallocated accordingly. Undertaking the Green Belt review first will then show the housing numbers which

¹ Defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a) (check unrestricted sprawl of large built up areas), (b) (prevent towns merging), or (d) (preserve the setting and special character of historic towns) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. These areas and assets comprise of: habitats sites and/or designated as Sites of Special Scientific Interest; land designated as Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.



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will need to be delivered appropriately elsewhere in the Borough. To allocate housing figures before understanding this position would be incorrect.

The Green Belt review should take into account a number of factors when assessing areas/sites for release. This should include proximity and accessibility to public transport hubs in the rural areas. Sites in more accessible locations should be identified as being more sustainable, and hence more preferable in this regard.

Question SS10 Are there any other considerations that we should take account of in relation to future Green Belt policy?

When undertaking Green Belt Assessments as part of this Local Plan process the Grey Belt potential of sites should be taken into account when considering candidate sites for releasing Green Belt land.

Question SS11 Please select the option which is the most appropriate spatial strategy for Cheshire West and Chester: a. Option A- Retain the Green Belt; b. Option B- Follow current Local Plan level and distribution of development; c. Option C- Sustainable transport corridors; and d. None of these.

In the Sustainability Appraisal (SA) the only area where option A scores highly is in respect of conserving and enhancing the historic environment. However, in implementing this option the density of development in existing urban locations, such as Chester where there are numerous historic assets, would need to increase. This option actually therefore has the potential to negatively impact this consideration in the SA. In addition, as set out above given the introduction of 'Grey Belt' land in the NPPF there should be a review of the Green Belt to identify land that is suitable for release given this change (and others) in National Policy. It is clear that in all other considerations set out in the SA that options B and C comprise of the most sustainable approaches for the emerging Local Plan, and that these options align with the Council's commitment to its declared Climate Emergency and the associated 'Cheshire West and Chester Climate Emergency Response Plan'.

Question SS12 Do you have any alternative spatial strategy options that you would like to suggest?

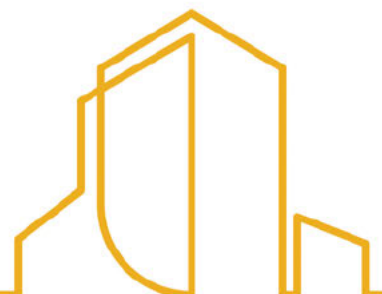
It is anticipated that as detailed assessments are undertaken, including housing needs assessment (to ascertain the scale of housing need in the Borough), review of local services and facilities in Key Services and rural settlements and a Green Belt Assessment that a hybrid of options B and C is likely to be the most appropriate approach to ensure that new development is sustainable in the emerging Local Plan.

Question SS14 Do you feel that Option A is an appropriate spatial strategy for the new Local Plan?

Whilst we agree with the approach that all key settlements should accommodate a level of development in the Local Plan Period this approach is not considered suitable for the reasons set out above, i.e. housing need, changing policy at a National level in respect of Green Belt protection and sustainable development principles including walkable neighbourhoods and travel patterns. Moreover positioning new development in settlements to avoid Green Belt is not considered to achieve sustainable development, for example in Cuddington and Sandiway new development will be positioned furthest from the train station, and certainly not create walkable neighbourhoods with the extension of existing services and facilities. Therefore whilst this approach complies at a high level with Green Belt objectives, it does not align with other key sustainable development considerations.



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QuestionSS16 Do you feel that Option B is an appropriate spatial strategy for the new Local Plan?

This is a more preferred approach to option A as it ensures new homes are located close to existing services and facilities and generally provides a more equal distribution of development across the Borough. In addition, the location of new development will not be restricted to outside of Green Belt locations simply due to the historical designation, which it is anticipated has largely served its function to focus regeneration on previously developed land in existing towns in the North of the Borough. Particularly where these locations may otherwise conflict with other principles of development.

If development across the Borough is to align with the current Local Plan, the settlement hierarchy is expected to remain similar to that in 2015. In this instance continuing to apply the same level of development to the key settlements would be appropriate. However given that 10 years have passed since this approach was adopted the level of services, facilities and public transport links in each of these settlements does need to be re-assessed in order to establish this.

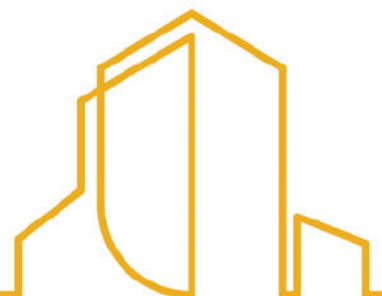
It is important to recognise that Option B does not in fact follow the existing Local Plan distribution for the rural settlements. The proposed allocation of 3,000 homes would result in a proportional reduction in development in the rural area. Accordingly, the Spatial Distribution would need to reflect the table below to at least retain the proportionality of the existing plan in order to not disadvantage the Rural area in the new plan period.

Settlement	Existing Local Plan Housing Allocation	Option B should be Existing and increased by 1.74.
Cuddington and Sandiway	200	348
Farndon	200	348
Frodsham	250	435
Helsby	300	522
Kelsall	200	348
Malpas	200	348
Neston	200	348
Tarvin	200	348
Tattenhall	250	435
Tarporley	300	522
Total	2300	4002

Also, it is actually considered that more development may need to be allocated to the rural part of the Borough



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if the Green Belt review doesn't identify suitable large scale sites for release in the Green Belt to accommodate the 11,000 no. homes Option B suggests may be located in the Green Belt, for example should EP 01 in Ellesmere Port not come forward.

Question SS17 If you do not feel that Option B is an appropriate spatial strategy option, are there any changes that you could suggest?

Option B clearly doesn't follow the past Local Plan distribution percentages for the Key Service Centres and in fact it restricts and reduces housing numbers in these key settlements in the rural area of the borough, which is an incorrect approach. Also, to suggest as part of this option that 11,000 no. homes in Green Belt without a full Green Belt Study to identify the appropriateness of areas and sites to accommodate this level of growth in the Green Belt versus other locations is highly questionable at this early stage in the Local Plan process.

Clearly the key evidence reports need preparing and a balanced distribution of employment and housing allocations should be taken from that evidence. Overall a release of Green Belt land should be accepted so as to achieve the employment and housing requirements over the plan period, but Option B needs to be further informed by the key evidence rather than this early suggested distribution being put forward without the evidence base to support it in principle/demonstrate that it is possible.

Question SS18 Do you feel that Option C is an appropriate spatial strategy for the new Local Plan?

This approach is also a preferred approach to option A as it ensures new homes are located close to existing services and facilities and generally provides a more equal distribution of development across the Borough. In addition, the location of new development is not restricted to outside of Green Belt locations simply due to the historical designation. Particularly where these locations may otherwise conflict with other principles of development.

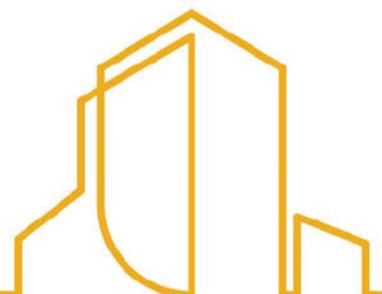
Consideration of the bus network is considered to be a key factor in applying this approach as the rail network in the borough is limited to the North, and focussing new development here is likely to come at the expense of the bus network. That is, if limited levels of new homes were provided in the south of the Borough and bus usage in this part of the Borough reduced as a result, services would also reduce and result in a spiral of decline for the bus service in the south of the Borough. To ensure this does not happen new homes need to also be provided along key bus routes.

In applying this approach account must also be had to the level of other key services and facilities in the rural settlements and the accessibility of these for new development. Developing walkable neighbourhoods is also key to encouraging sustainable and healthy communities, and ultimately reducing the need to travel by private car, and align with the Council's Climate Emergency Response Plan.

Importantly new housing of at least past Local Plan proportions needs to be allocated to the rural area notably identified Key Service Centres in order to maintain their transport status and overcome the declining bus service. The required new Local Plan Transport Assessment should clearly consider the level of housing required to support the Bus network in the rural area to maintain and improve its services in this important part of the Borough.



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Question SS19 If you do not feel that Option C is an appropriate spatial strategy option, are there any changes that you could suggest?

Ultimately to ensure a sustainable pattern of residential development over the plan period public transport availability must be taken into account alongside the availability of local services and facilities. It should not be considered in isolation.

Again, the required new Local Plan Transport Assessment should clearly consider the level of housing required to support the Bus network in the rural area to maintain and improve its services in this important part of the Borough.

Question SS21 What information should we take into account when assessing sites for allocation in the new Local Plan?

It is suggested the following factors be taken in to account when considering new allocations:

- Sustainability and Accessibility: with consideration including proximity to public transport, services, employment, and existing infrastructure;
- Environmental Constraints: with consideration including flood risk, biodiversity impact, heritage assets, landscape sensitivity, and climate resilience;
- Deliverability and Viability: with consideration including land availability, ownership, infrastructure requirements, and financial feasibility;
- Infrastructure Capacity: with consideration including ability of utilities, highways, schools, and health facilities to accommodate growth;
- Alignment with Policy Objectives: with consideration including consistency with national planning policy, housing needs, economic growth targets, and regeneration priorities;
- Community and Social Considerations: with consideration including potential for creating cohesive, mixed, and healthy communities with good design; and
- Site Suitability and Scale: with consideration including physical characteristics (size, topography, access) and compatibility with surrounding uses.

In respect of the site put forward in Cuddington there are no major constraints to a future residential development in principle when reviewing the sites against this list of considerations.

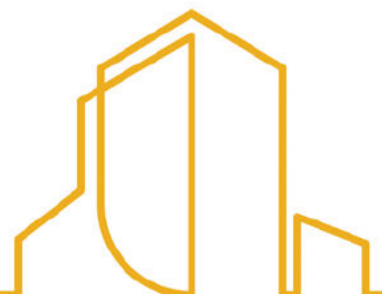
Question SS35 Which of the identified potential growth areas around Cuddington and Sandiway do you consider to be the most suitable?

CUD04 is considered to be a suitable, and common sense, growth option for new housing in Cuddington:

- it is located close to the centre of Cuddington, including the train station, and therefore provides a realistic opportunity to reduce travel by private vehicles and therefore represents the most sustainable



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option for new development in Cuddington;

- this area is located close to Cuddington local centre, and provide an opportunity to expand and enhance the vitality and viability of the local centre and businesses located in the and around the local centre;
- the site is relatively free from development constraints, and certainly not subject to any determinative constraints;
- whilst this area of growth is located wholly in the Green Belt, it is surrounded by development on two of its three sides, and is not making a significant contribution to the openness and character of the North Cheshire Green Belt given its context. Ultimately this area of growth is not contributing to the five purposes of the Green Belt given its context;
- growth in this area would make a sensible 'rounding off' of the settlement; and
- the first part of this area of growth is in the control of an active landowner willing to bring it forward now, with an estimated capacity for 50-60 new homes together with public open space.

We fully support this area of growth, and believe it should be considered as a suitable area of growth under all of the options put forward by the Local Plan as we consider that this area of growth is 'Grey Belt' land as defined in the NPPF. Whilst this area is not previously developed land:

- land that does not contribute to checking un restricted sprawl of an existing built up area, as it already has development on two of its three sides;
- land that does not contribute to preventing two towns merging, as both developed sides of the site form part of Cuddington;
- land that does not contribute to preserving the setting and character of a historic town as the nearest part of the Cuddington Conservation Area is over 400 metres to the east of the Site and separated by built form of the existing village; and
- the Site is not subject to any of the designations in footnote 7 of the NPPF, which would provide a strong reason for refusing or restricting development i.e. it is not designated as Local Green Space, a National Landscape, a National Park; does not contain irreplaceable habitats or designated heritage assets; and is not in an area at risk of flooding.

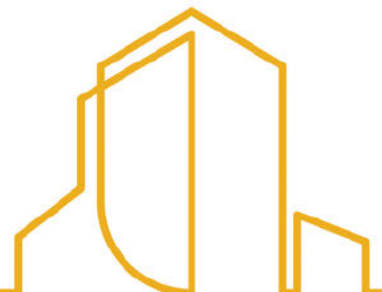
Therefore this area of growth should be classified as Grey Belt and should be considered acceptable in all options of the emerging Local Plan.

The Site subject of these representations are within this area of growth, and are of a sufficient scale to make a difference to meeting the housing needs in the village without having any significant impact on local services and facilities. Moreover, supporting the allocations of this site will enact the NPPF's support for small-medium size sites and SME developers.

In respect of the other areas for growth in Cuddington and Sandiway:



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- CUD01 and CUD05 are located to the north of the village, wholly in open Green Belt, the suitability of these areas of growth will therefore need to be considered in a forthcoming Green Belt Assessment;
- CUD02 and CUD03 are both located outside of the Green Belt, but not is a sustainable location, they are located furthest from the village's existing services and facilities, in particular the train station which would not be within walking distance and therefore the potential for new households making use of sustainable transport links to the rest of the Borough would not apply. Moreover these areas of growth would be separated from the existing village by the A556, which is a significant barrier to creating a cohesive community. In effect, without any comprehensive consideration to a change in infrastructure, growth in this location would become a new settlement that would be reliant on travel by private cars, as opposed to forming part of the existing community.

Overall CUD04 is considered to be the most appropriate area for growth, and given that it is a clear candidate for Grey Belt land it should be considered as an area of growth for the village for all of the options put forward for the emerging Local Plan.

Question SS36 Do you have any further comments about any of the potential growth areas identified around Cuddington and Sandiway?

Whilst CUD04 would not comply with Option A as put forward in this Issues and Options document at present. As set out above once a Green Belt assessment has been undertaken it is anticipated that this area of growth will become suitable for all options of the emerging Local Plan because of it falling within the definition of Grey Belt. Moreover this area of growth would clearly round off the settlement, and locate development in a sustainable location, close to the heart of the communities services and facilities in Cuddington.

Question SS37 Are there any constraints, including infrastructure provision, that should be considered for Cuddington and Sandiway when developing the new Local Plan?

From review of the 'Places Background Paper- Cuddington and Sandiway' there are no constraints to new development in Cuddington and Sandiway. The settlement already benefits from a range of retail and community services and facilities, including bus and rail links.

The only constraint to the site these representations are promoting is the Green Belt designation, which as set out above is not applicable to CUD04 due to the Government's introduction of the definition of Grey Belt land in the NPPF and the context of this area of growth. In respect of all other sustainable development considerations this area of growth is well placed to provide much needed homes, rounding the settlement off and providing homes close to existing services and facilities and the train station.

Question GB1 Do you agree with the suggested policy approach towards Green Belt and countryside, as set out in GB1 'Green Belt and countryside' above? If not please suggest how it could be amended.

Until the policy approach is identified, amendments to these policies are very uncertain.

Question GB2 Should there be a separate policy for countryside and Green Belt areas?

Yes, there should be separate policies for land that will continue to be designated Green Belt and Open



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Countryside in the emerging Local Plan given the different status and levels of protection that these areas are given in National Policy.

Question ID1 Do you agree with the suggested policy approach towards infrastructure and developer contributions, as set out above in ID1 'Infrastructure and developer contributions'? If not please suggest how it could be amended.

Developer contributions sought should be: necessary, directly related, and fairly and reasonably related in scale and kind in accordance with the NPPF.

As set out in the Planning Practice Guidance 'Plan makers should consider the combined total impact of such requests so they do not undermine the deliverability of the plan'², i.e. combined planning contributions should not render the deliverability of allocated sites as unviable. Therefore as the Local Plan progresses, and a complete picture of contributions likely to be sought through emerging policies for new developments becomes clear, there should be a test of viability to ensure any contributions set out in policy will not render new development in the plan period to be unviable.

Question ID2 Should developer contributions only apply to major developments? How should 'major development' be defined?

We consider that 'major development' should be defined as schemes of 100-200 no. homes plus.

Question ID3 Do you agree that developers/operators should pay the full cost of infrastructure required to deliver their sites?

Again, we would reiterate, Developer contributions sought should not make new development unviable, and should be: necessary, directly related, and fairly and reasonably related in scale and kind in accordance with the NPPF. As the Local Plan progresses, and a complete picture of contributions likely to be sought for new developments becomes clear, there should be a test of viability to ensure any contributions set out in policy will not render new development in the plan period to be unviable.

Question HO1 Do you agree with the suggested policy approach towards mix and type and specialist housing in new developments, as set out in HO1 'Mix and type of housing in new developments and specialist housing' above? If not please suggest how it could be amended?

It is unclear if the Council can show failure by developers that suitable market schemes have not delivered required housing mixes suitable for the housing needs of the Borough during this current plan period.

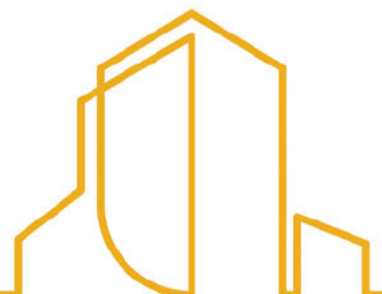
If policies are proposed relating to house type mix for the emerging plan period these should well evidenced and be flexible as every site invariably has different factors to consider when bringing it forward, including the local context, housing market, and housing need, which can vary across the Borough. Clearly any policy would need to be regularly reviewed as needs inevitably change too.

Also, significant flexibility should be given on smaller sites in order not to restrict SMEs bringing forward sites.

² See Planning Practice Guidance Paragraph: 003 Reference ID: 23b-003-20190901



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Therefore housing mix policies should only apply to large scale sites.

Question HO2 Should the housing mix and type and specialist housing be delivered through a percentage policy approach that sets requirements for each category of housing?

If policies are proposed on Housing mix for the plan period these should be regularly reviewed, as needs change over time.

Also significant flexibility should be given on smaller sites in order not to restrict SME's bring forward sites. Therefore housing mix policies should only apply to large scale sites, i.e. policies should only apply to sites of 100 no. plus unts to allow SMEs flexibility.

Question HO4 Do you agree with the suggested policy approach towards delivering affordable housing, as set out in HO2 'Delivering affordable housing' above? If not please suggest how it could be amended?

Provisions should be included to consider the viability of the level of contributions sought, once established at the next stage of the Local Plan.

Affordable Housing percentages should reflect National Guidance and the Rural trigger level is considered too low and will likely lead to lower level of housing being delivered in the Rural area Plan period. The Council would need to show this is not the case.

Question HO5 Do you have any views on thresholds for affordable housing in relation to applying a lower threshold for designated rural areas and what approach could be taken to parts of the borough not subject to the designation?

Affordable Housing percentages should reflect National Guidance and the Rural trigger level is considered to low and will likely lead to lower level of housing being delivered in the Rural area Plan period. The Council would need to show this is not the case if they want to have different thresholds, and that there is evidence to justify this deviation from National Policy.

Question HO16 Should the policy approach towards rural exception sites continue to apply to all identified smaller settlements or just those in more remote areas of the borough?

This should continue to apply to all smaller settlements, otherwise the Policy could be too limiting.

Question HO17 Should market housing still be allowed through the policy on rural exception schemes?

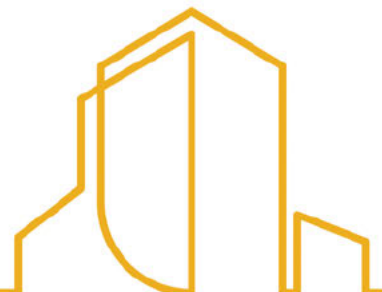
If required to make the affordable housing viable then market housing should be allowed. This continued approach also aligns with the NPPF.

Summary and Conclusions

These representations have been made on behalf of Central & Country Developments Ltd, who own the freehold title of the land off Forest Road, Cuddington, that currently form part of the Land Availability Assessment (sites



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reference 0167 and 2270). It is considered that the sites? put forward are suitable and available for delivery now, and certainly can deliver new homes in the early stages of the emerging Local Plan period, thereby assisting in delivering much needed homes in the borough to meet the step change in housing need identified by the Council for this emerging plan period. As set out in the NPPF, National Government support the delivery of small-medium sites and SME Developers, who often build out sites relatively quickly.

From review of the Issues and Options put forward in this Regulation 18 consultation we consider that more evidence base assessments are needed to be undertaken to form the policies and strategies of the Local Plan. Based on the level of assessment work undertaken to inform this consultation it is clear that further assessment is needed before housing units can be allocated to strategic areas of the Borough and this includes a robust assessment of the Green Belt given the step change in housing need and National Government's approach to Green Belt protection.

I trust the information set out in this letter will be taken into account when progressing the Local Plan. Please also accept this letter as a request to be kept informed as the Local Plan progress, including notifications to any further consultations. If there is anything further that we can assist with, please do not hesitate to contact me.

Yours sincerely,



Hayley Knight
Director, Hayley Knight Planning Limited
Telephone: [REDACTED]
E-mail: [REDACTED]

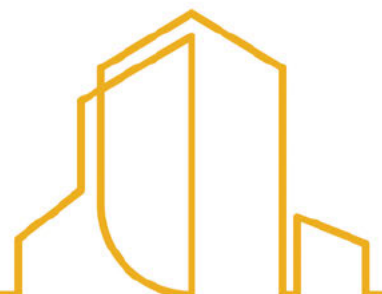
Enclosures:

Enclosure 1: Title Plans showing the land interest noted as being Greenacres, 7 Forest Road, Cuddington (Land Availability Assessment site references 0167 and 2270)

Enclosure 2: Letter from the Parliamentary Under-Secretary of State for Housing and Local Government to the Leader of Cotswold District Council in respect of housing targets and local plans, dated 18th August 2025



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Enclosure 1:

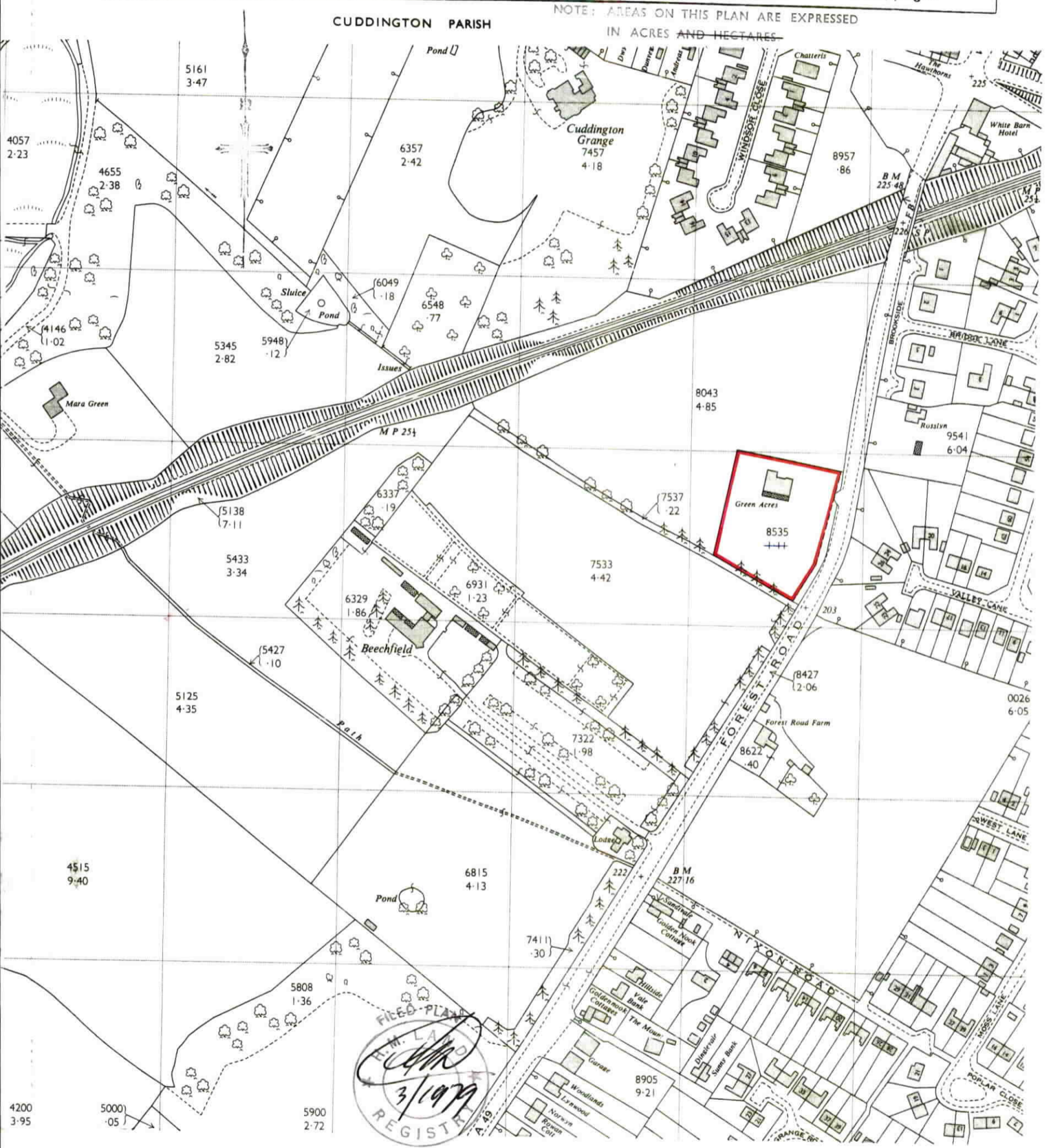
Title plans showing the land at Greenacres, 7 Forest Road, Cuddington (Land Availability Assessment site references 0167 and 2270)



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H.M. LAND REGISTRY		TITLE NUMBER	
		CH 132972	
ORDNANCE SURVEY PLAN REFERENCE	COUNTY	SHEET	NATIONAL GRID
	CHESHIRE		SJ 5971
Scale: 1:2500	VALE ROYAL DISTRICT		© Crown copyright



The boundaries shown by dotted lines have been plotted from the plans on the deeds. The title plan may be updated from later survey information.

This is a print of the view of the title plan obtained from HM Land Registry showing the state of the title plan on 03 July 2024 at 14:28:07. This title plan shows the general position, not the exact line, of the boundaries. It may be subject to distortions in scale. Measurements scaled from this plan may not match measurements between the same points on the ground.

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MB 25

TITLE NUMBER

H.M. LAND REGISTRY

CH 175323

ORDNANCE SURVEY
PLAN REFERENCE

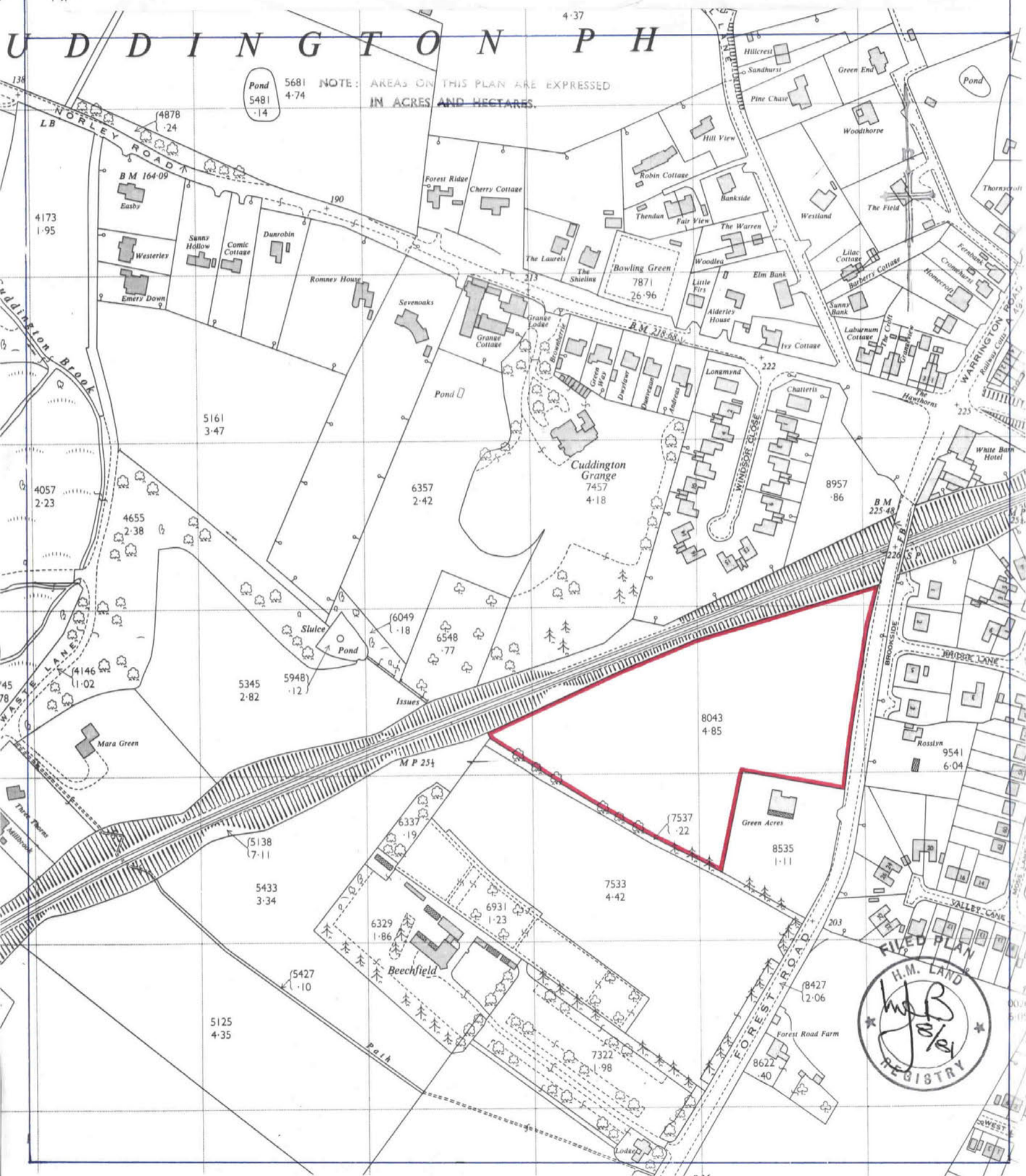
SJ5971

Scale
1/2500

COUNTY CHESHIRE

DISTRICT VALE ROYAL

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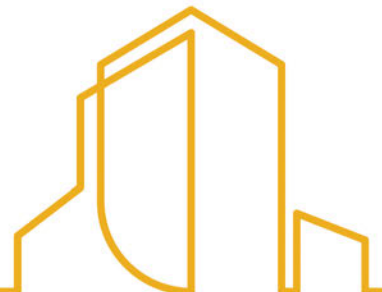
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Enclosure 2:

Letter from the Parliamentary Under-Secretary of State for Housing and Local Government to the Leader of Cotswold District Council in respect of housing targets and local plans, dated 18th August 2025



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Ministry of Housing,
Communities &
Local Government

Baroness Taylor of Stevenage

*Parliamentary Under-Secretary of State for Housing
and Local Government*

2 Marsham Street
London
SW1P 4DF

Our reference: MC2025/21184

Cllr Mike Everny
Leader of Cotswold District Council
Trinity Road
Cirencester
Gloucestershire
GL7 1PX

18th August 2025

Dear *Councillor Everny*

Thank you for your letter of 22 July on behalf of the Cotswold District Council to the Deputy Prime Minister, concerning housing targets and local plans. I have been asked to reply.

As I am sure you are aware, we are in the middle of one of the most acute housing crises in living memory. Home ownership is out of reach for too many, too few homes are built, and even fewer are genuinely affordable. Our housing shortage drives high rents and leaves some of the most vulnerable without access to a safe and secure home. The Government believes that we must build more homes, and in the places where people want to live and work, and that the best way to deliver is through a reformed planning system. Housing targets are an important tool to ensure housing is delivered in the right places.

In December 2024, the Government implemented a new standard method for assessing housing needs which aligns with the ambition for 1.5 million new homes over this parliament, and that better directs new homes to where they are most needed and least affordable.

The Government has always been clear these are ambitious targets. To identify the minimum number of homes expected to be planned for, the standard method uses a formula that incorporates a baseline of local housing stock, which is then adjusted upwards to reflect local affordability pressures. Areas where unaffordability is most acute see the largest adjustment.

A standard method is used by local authorities to inform the preparation of their local plans. Once local housing need has been assessed, authorities should then make an assessment of the number of new homes that can be provided in their area. This should be justified by evidence on land availability and constraints on development, such as National Landscapes, areas at risk of flooding, and any other relevant matters.

The new method strikes a balance between meeting the scale of need across the country and focusing additional growth on those places facing the biggest affordability pressures, by more than doubling the affordability multiplier applied in the method. It is based on a more objective assessment of need, supports a more strategic approach to housing, distributing growth across

wider city regions, not just to the largest urban authorities within our largest cities. Housing need across Mayoral Combined Authority areas will increase by over twenty percent compared to the current method.

Where housing delivery lags behind local need, it is right that local authorities take the steps necessary to increase housing delivery, including bringing forward new homes from outside the plan, where appropriate. However, the Government is clear that this is not a passport to poor quality housing, and it has added new safeguards to 'the presumption' to ensure this. While the lack of a five-year housing land supply is a strong indicator of housing need in an area not being sufficiently met, this does not mean that planning permission for housing will be automatically granted, and local planning authorities must consider a range of factors when determining planning applications.

All areas of the country must play their part in building the homes we need. The Government expects local authorities to explore all options to deliver the homes their communities need: maximising brownfield land, working with neighbouring authorities, and, where necessary, reviewing Green Belt. Each authority is expected to assess and plan how to meet its local housing needs over the plan period.

Each local plan is subject to a public examination in front of an independent Inspector, who plays an important role in examining plans impartially to ensure that they are legally compliant and sound. A sound plan should be consistent with national policy, be positively prepared, effective, and based on proportionate evidence. Plans should also take the views of local people into account.

Further detail on the operation of the revised method can be found in the Government Response December 2024, accessible via: www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/outcome/government-response-to-the-proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system-consultation#a-new-standard-method-for-assessing-housing-needs.

Further, contributions from developers play an important role in helping to deliver the infrastructure needed to support new homes. Local planning authorities can collect these contributions through the Community Infrastructure Levy (CIL) and section 106 planning obligations.

CIL, which has been charged by Cotswold District Council since June 2019, is a locally set charge on most new development in an area to help fund the infrastructure needed to address the cumulative impact of new development across the charging authority's area. Local planning authorities can also seek a section 106 planning obligation from a developer, as a requirement of planning permission, to mitigate the impact of a specific development. The planning obligation might for example, require a contribution towards a new or improved health facility or school, or transport improvement, needed due to the development.

As you know, the Government was elected on a manifesto that included a clear commitment to build 1.5 million new homes in this Parliament. To deliver on that objective, the revised National Planning Policy Framework (NPPF), published on 12 December 2024, introduced a new standard method for assessing local housing needs which better reflect housing pressures across the country, and that

uses a stronger affordability multiplier to focus additional growth on those places facing the biggest affordability challenges.

All parts of the country, including your area, are required to play their part, and decisions made locally should be about how to meet housing needs, not whether to do so at all.

Getting a local plan in place is the most effective protection against speculative development. Cotswold District Council last adopted a local plan in 2018, and the Government is aware you have been working on an update since 2020, with public consultations in 2022 and 2024. Where plans are not up to date, it is right that development can come forward outside of the plan. From the Government's point of view, the homes our country needs cannot be put on hold.

The concerns you raise in your letter regarding local constraints have been noted. ~~Still~~ Your area is not unique in facing challenges in bringing forward a local plan that meets the needs of the community. Local planning authorities throughout the country with similar pressures are nevertheless setting ambitious timetables to progress their local plans. The Government has provided £28 million in grant funding to support local plan progress, and your Council was recently awarded £227,962.50.

The Government therefore expects Cotswold District Council to quickly bring forward a plan that is capable of being found sound; one that uses the standard method to inform the preparation of the plan and takes account of the advice the Council has already received from the Planning Inspectorate.

Thank you again for taking the time to write on these important matters.

Yours sincerely,



BARONESS TAYLOR OF STEVENAGE
Parliamentary Under-Secretary of State for Housing and Local Government