

Cheshire Planning Solutions Ltd  
Local Plan Issues and Options Regulation 18 consultation  
Comments on the consultation document

**Q IN 6** - what role Neighbourhood Plans should play in terms of meeting Cheshire West's development needs

Neighbourhood Plans should help to determine the type and extent of development within the local area. For example, housing to support local needs and improving sustainability of a settlement. There are many small villages throughout Cheshire West that are surrounded by Green Belt which makes expansion challenging. Rather than the Government's latest 'grey belt model' which has the potential to, in some cases, over develop some areas in a blanket approach, it would be more sustainable in rural communities specifically, to limit expansion to small pockets of development throughout the plan period. For example, in local service centres, limiting housing development to a maximum of 20 houses in a development to ensure rural communities are not overwhelmed in terms of additional traffic and increased use of local services and facilities. With a requirement for landscape buffers between developments, this would ensure that the rural character of these villages would be retained and growth of the population in the areas would be at a more sustainable rate.

More development than is currently permitted within Local service Centres is certainly required, to ensure there are sufficient numbers of young people able to stay within their local area and to provide for more young people to move to these areas, or older members of the community to downsize, enabling local services and facilities to remain financially viable. Land should also be available for new development for small businesses on the outskirts of local service centres, which would help to provide employment and improve the rural economy.

The local community are best placed to determine the best locations for new development within their local area.

**GB 1 Green Belt and countryside**

The Green Belt policy should be expanded to include additional appropriate uses, particularly small-scale businesses that serve rural communities and economies.

Current Green Belt designations frequently exclude viable small business uses that could operate successfully on the periphery of rural settlements. These include small-scale tourist accommodation, landscape and agricultural service businesses, modest office facilities for local rental, and storage operations. Such uses often struggle to find suitable existing buildings for conversion, yet they provide essential services to rural areas and support local employment.

Small business development can complement rural settlements without compromising Green Belt objectives when properly managed. These operations typically generate low traffic

volumes and can integrate well with rural landscapes through appropriate design and landscaping measures.

Protection of rural character must remain paramount, with any permitted development required to demonstrate small scale and compatibility with existing local infrastructure capacity. Proposals should undergo careful assessment to ensure they do not create inappropriate urbanisation, or place excessive demands on rural road networks and utilities.

Mandatory landscape buffering could be implemented, where appropriate, to screen development and maintain the visual openness that defines Green Belt character. This approach would enable rural economic diversification while preserving the fundamental purposes of Green Belt designation.

Expanding appropriate use categories would provide greater flexibility for sustainable rural enterprise while maintaining robust controls to prevent inappropriate development that could undermine Green Belt integrity.

### **GB 2 Should there be a separate policy for countryside and Green Belt areas?**

A separate policy framework for countryside and Green Belt areas should be maintained despite the introduction of grey belt designations, as these areas warrant distinct policy approaches reflecting their different levels of protection.

Green Belt continues to receive heightened protection from development under national policy, with more stringent restrictions on what constitutes appropriate development. These constraints are fundamental to Green Belt's strategic purpose in preventing urban sprawl and maintaining settlement separation. Applying identical policy approaches to both Green Belt and general countryside areas would inappropriately extend these restrictive controls to areas not designated for such protection.

The countryside outside Green Belt boundaries serves different planning functions and can accommodate forms of development that would be inappropriate within Green Belt. Rural areas not subject to Green Belt designation should retain greater flexibility for appropriate development that supports rural communities and economies without compromising the strategic purposes that Green Belt policy is designed to achieve.

Rural areas have varying sensitivities and development pressures that cannot be effectively managed through a single policy framework. The grey belt designation adds another layer to this hierarchy but does not eliminate the need for distinct countryside and Green Belt policies that reflect their fundamental differences in planning status and protection levels.

### **GB 3 Are any other uses appropriate in the countryside that should be reflected in the policy?**

Additional uses appropriate in the countryside should be incorporated into policy to support rural vitality and economic sustainability.

Tourist accommodation scaled appropriately for its location should be recognized as suitable countryside development. Such facilities must consider access arrangements, proximity to existing housing, and potential impacts on neighbouring businesses regarding noise or disturbance. Rural tourism provides significant opportunities for countryside enjoyment while supporting local business trade and economic activity.

Small-scale business uses should be deemed appropriate as they create rural employment opportunities, strengthen local economies, and reduce commuting distances for residents. Examples include storage facilities for landscaping and amenity sector equipment, small rental office spaces for emerging businesses or individuals, and modest storage operations serving local needs.

The shift toward home working has created demand for flexible workspace that rural areas currently cannot meet. Many residents face isolation working from home, while start-up businesses struggle to find affordable premises. Small storage facilities also address practical needs, providing space for vehicle storage, household items, or goods for online retail that many rural properties cannot accommodate.

New countryside buildings for small business use should be limited to specific parameters, such as 1,000 square meters maximum floor area, single-storey construction, and design sympathetic to rural character. Landscaping conditions should ensure adequate screening and prevent sites appearing urbanised, maintaining countryside visual amenity while enabling appropriate economic development that supports rural communities without compromising landscape quality.

**GB 4 Should the policy limit redevelopment to that of the same use and other policy compliant development?**

Yes, if other suitable uses, (examples as listed in GB 3) are deemed appropriate. At present the 'appropriate use' is too restrictive. Nonetheless, some restrictions should be retained to limit the type and scale of development to that which would be suitable within a rural area. No restrictions could lead to an overwhelming drain on existing infrastructure; noise and nuisance to local communities and disruption of existing businesses, including the agricultural sector.

**Question GB 5**

How else can rural buildings, rural character be protected and prevent new development harming the intrinsic character through 'urbanising' the countryside?

For local service centres, the rural character can be protected by ensuring only small scale developments are permitted. This could include restricting housing developments to a maximum of e.g 20 units on a site, or restricting the scale of any business premises to e.g 1000 sq m with a height restriction of 5m. Landscape buffers should be a condition of any development. Schemes should be designed to be sympathetic to the rural character of an area in terms of layout, scale, materials and landscaping.

For key service centres, development should be restricted to a percentage of growth based on the existing number of houses. For example, from census data there are approximately 1,500 households in Kelsall, a key service centre that has a coop, chemist, medical centre, primary school and bus links. If the plan period is 15 years and development were restricted to an increase in households of, for example, 15% over the plan period, that would equate to an additional 225 houses. That could be further restricted with development having to be phased, with for example no more than 50 houses being constructed within 1 year. Some of the key service centres are considerably larger than others and have more extensive infrastructure, better able to cope with more rapid expansion. For Example, Frodsham has (according to census data) 4,274 households, a train station, medical centre, large array of shops and Helsby, which has a train station, shops and a senior school, has 2,652 households. If something like a 15% increase were implemented then Frodsham would have an additional 641 additional homes and Helsby would have 398. These figures would seem far more sustainable than the current Government figures imposed on CWAC.

It is understood that the Government wishes to drastically increase housing numbers and that the majority of housing should be built around the main urban areas. Nonetheless, with the introduction of Grey Belt and new housing targets set by the Government, developers are understandably keen to build around the attractive and lucrative rural areas. However, if more rural communities are inundated with high levels of development without restriction, the local infrastructure will be overwhelmed and the rural character of communities will be lost. Expansion of rural towns and villages is inevitable and required, but it should be carried out slowly and sustainably over a period of time, to allow the infrastructure, local services and facilities to be upgraded over time to safely accommodate the growth.

### **Question VE 1**

Do you agree with the suggested policy approach towards the visitor economy, as set out in [VE 1 'Visitor economy'](#) above. If not please suggest how it could be amended?

In terms of the wording of the policy of VE 1, for Caravan and Camping sites, it states that they should utilise or be well related to existing buildings. This therefore suggests that a new site, with no existing buildings will not be permitted. I do not agree with this. In suitable locations, small scale caravan and camping sites should be able to be accommodated within rural areas, subject to criteria, including the cumulative effect of other surrounding development.

### **Question VE 3**

Do you agree with the suggested policy approach towards rural tourism and leisure, including visitor accommodation policies (caravan and camping sites) in the countryside?

The policy states "Elsewhere in the borough, proposals for visitor attractions or visitor accommodation will be supported in line with other relevant policies of the plan and with regard to NPPF paragraph 88." STRAT 9 Green Belt and countryside does not allow for new tourist accommodation outside of settlement boundaries, despite the NPPF para 88 stating

Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, new buildings
- c) sustainable rural tourism and leisure developments which respect the character of the countryside;

STRAT 9 should be altered to include tourist accommodation in line with the NPPF and VE1.

### **Question 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' ? If not please suggest how it could be amended?

The policy doesn't state a scale of development to which this policy would relate. For example, if a scheme for 5 houses were brought forward, it would be difficult and potentially financially unfeasible to provide a mixture of type and tenure of homes within such a small site. In addition, this doesn't allow for a small site to be entirely 2/3 bed bungalows for example, which is maybe what is required in a specific area.

### **Question 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?

Yes, subject to evidence of the Housing Needs Assessment, but it should also be restricted to schemes over a certain size, for example if 10 or more homes are to be built.

### **Question HO 5**

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?

All areas of the borough should maintain a consistent requirement for affordable housing provision on developments of 10 or more homes. Lowering this threshold to 3 or more homes in rural areas risks creating unintended consequences that could undermine both housing delivery and appropriateness.

In rural locations, small development sites command premium land values. When developers face affordable housing obligations on such constrained sites, they are incentivised to maximize returns from market housing to offset costs. On a three-unit scheme where one home must be affordable, developers would likely construct two substantially larger, higher-value market homes alongside one minimal affordable unit. This approach would produce housing that is less accessible to a broader range of buyers than three modestly-sized homes at lower price points.

The current threshold recognises that smaller rural developments operate under different economic pressures than larger schemes, where affordable housing requirements can be more effectively absorbed. Maintaining the 10-unit threshold ensures that when affordable housing is required, it can be delivered appropriately without distorting the local housing mix or creating perverse development patterns that ultimately serve fewer people's housing needs.

#### **Question HO 7**

Are Local Plan (Part Two) policies DM 19, DM 21 and DM 22 working effectively; remain relevant; or are all issues covered by current national policy and guidance?

DM 22, within the countryside states that buildings to be converted must be redundant. This goes against the NPPF para 154 g) which states that suitable development in the Green Belt includes limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt. If buildings in the GB are not restricted to having to be redundant to be converted, then there is no reason to suggest that buildings in the open countryside should be.

#### **Question HO 8**

Within this policy approach (or elsewhere) should the new Local Plan set out more detail on what development is appropriate in the Green Belt, with respect to, for example, house extensions; what is small scale/subordinate (not increasing size of a dwelling by more than 30%) etc?

Yes, providing more clarity on Green Belt development would be beneficial.

#### **Question HO 9**

Are there any local/borough specific issues e.g. intensification of garden development, infill or backland development, change of use of garages to residential, that justify additional/continuation of policy?

DM 22 establishes that countryside proposals for converting buildings to dwellings must meet specific criteria, including that the original building purpose was not ancillary or incidental to a dwellinghouse, such as garages. This blanket restriction should be removed as it is overly prescriptive and counterproductive.

Many properties feature substantial, detached garages and outbuildings that could provide valuable residential accommodation as annexes, holiday lets, or independent dwelling units. In rural areas particularly, converting such structures could deliver additional housing without requiring greenfield development, supporting sustainability objectives and housing supply.

The current criterion creates an arbitrary distinction that fails to recognize the potential of well-built ancillary structures. Large, detached garages or former workshops may be entirely

suitable for residential conversion, offering better development opportunities than some buildings that technically qualify under the existing policy.

Since each application undergoes individual assessment, the planning process already provides appropriate mechanisms to evaluate suitability, structural integrity, and design quality. Not every garage or outbuilding will prove suitable for conversion, but the same applies to all building conversions regardless of original use. The case-by-case assessment approach renders a blanket prohibition unnecessary and potentially wasteful of valuable rural housing opportunities.

Removing this restriction would enable more flexible and sustainable rural housing delivery while maintaining proper planning controls through the individual assessment process.

#### **Question HO 16**

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?

The rural exception sites policy should continue to apply to all identified smaller settlements rather than being restricted to only the most remote areas of the borough.

Maintaining broad application ensures that sites can be delivered where genuine need exists, particularly in locations where other policy constraints limit development opportunities. In settlements surrounded by Green Belt designations, development restrictions significantly reduce overall housing delivery, including affordable provision. This constraint makes exception sites even more valuable as a mechanism for meeting local housing needs.

Even larger settlements may struggle to deliver the full range of housing types required by their communities within existing development boundaries. Standard development schemes typically provide only the minimum affordable housing requirement, often prioritizing higher-density units over specific housing types like bungalows or smaller starter homes that serve particular demographic needs.

Developers naturally focus on maximizing returns through larger family homes rather than delivering the bungalows and compact properties that are frequently most needed but least profitable. Rural exception sites offer a targeted mechanism to address these gaps, providing housing types that market-led development consistently under-supplies.

Limiting exception sites to only the most remote settlements would exclude communities that, while not geographically isolated, face significant development constraints through Green Belt policy or other restrictions. All smaller settlements should retain access to this policy tool to ensure local housing needs can be met where other delivery mechanisms prove insufficient.

#### **Question HO 17**

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

Market housing should continue to be permitted on rural exception schemes as this approach enhances both delivery prospects and community integration.

Enabling market housing allows private sector development of these schemes, significantly expanding opportunities for housing provision. With construction costs and land values continuing to escalate, developers require viable profit margins to bring forward any housing scheme. Purely affordable housing developments generate insufficient returns to attract private investment, limiting delivery to scenarios where public funding is available.

Including market housing within exception schemes creates the financial viability necessary for private sector involvement while still delivering affordable homes that would not otherwise come forward. This cross-subsidy model has proven effective in enabling development where purely affordable schemes would remain undelivered.

Beyond financial considerations, mixed-tenure schemes foster more balanced communities rather than creating segregated affordable housing enclaves. This integration is particularly important for rural exception sites, which sit at the edges of existing settlements. A mixed community approach helps new development blend with the established settlement pattern and avoids stigmatisation of residents.

The policy framework can ensure affordable housing remains the primary focus through appropriate tenure splits while recognizing that some market housing enables delivery and creates more sustainable communities. Without this flexibility, many exception sites would remain theoretical rather than delivering the rural affordable housing they are designed to provide.

#### **Additional comments regarding housing**

I suggest that some smaller market housing (i.e 2 bed houses) should have conditions, or covenants that restrict extensions. Many 2 bed 'starter homes' are extended by occupants, which increases their value, meaning they become less affordable for the next generation of people looking for a 'starter home'. Many young people would prefer to buy their own home, rather than rent or part share an 'affordable home', managed by a registered social landlord. House values generally increase over a period of time. Official figures from the ONS show the average UK house prices rose from £167,716 in January 2013 to £290,000 at the end of January 2023 - a gain of 73 per cent. If houses are extended and improved, this further exacerbates the rise in value of a property. If a percentage of new, small homes built had restrictions on permissions to extend, this would help to retain a larger portion of small homes for those trying to get on the property ladder.