

## **Cheshire West and Chester Council Local Plan Issues and Options Consultation**

July/August 2025

Response to selected questions on behalf of the SJ and PA Lee Partnership.

*Note: Question ref numbers refer to the questions in the consultation document.*

### **Question IN 3**

Do you have any comments or views on the proposed plan period for the new Local Plan?

The new local plan should, in accordance with national policy, cover a period of at least 15 years post its adoption date.

### **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?

Objective SO10 says that the general extent of the Cheshire green belt will be maintained. Whilst this may be possible, the overriding aim must be to ensure that local housing need is met in full and it is likely, if not inevitable, that this will require significant changes to the general extent of the current GB across the Borough. This objective therefore should be revised to reflect the chosen spatial option for the sustainable growth of the Borough, and cross refer to this, by adding the

following words (or similar) ...” commensurate with ensuring housing and other development needs are met across the Plan’s area”.

### **Question SS 1**

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

**No.** The Plan should meet local housing needs, as calculated by the 2024 Standard Method, in full.

### **Question SS 2**

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?

**No.** The Plan needs to be ambitious and ensure that housing needs are addressed urgently, given the relative unaffordability of homes across many parts of the Borough.

### **Question SS 4**

*Do you agree with the suggested policy approach towards the spatial strategy principles, as set out in SS 3 'Spatial strategy principles' above? If not please suggest how it could be amended?*

**Yes.** It is clear that there will be a need for significant new housing allocations to meet needs. This will involve some green belt sites. The chosen sites should be focussed on the edge of existing settlements, be well related to existing built form, be capable of accessing (and supporting) local services, and with a reasonable public transport profile and good active



travel connections. All these matters should be proportionate to the size and function of the settlement, recognising (as the NPPF does) that public transport will be less available in settlements within the rural area than in the major towns or cities.

### Question SS 5

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?

We broadly agree with the settlement hierarchy in SS4. However, this also says:

It is recognised that smaller settlements which have a lower level of services and access to public transport could acceptably accommodate infill development and small previously developed sites to meet local needs.

We do not agree that in smaller settlements in the Borough development ought to be limited to infill development and small previously developed sites, as the above implies.

Even in smaller settlements, and especially where there is reasonable/good connectivity through public transport, active travel modes and proximity to local services, development of a proportionate scale on well-located greenfield sites (including green belt where necessary) can be appropriate and should be encouraged. Such settlements will be capable of meeting a proportion of the Borough's needs, and to limit this to infill sites or the capacity of previously developed land is to constrain the growth of such settlements when such growth



can have a valuable and positive role to play in the future sustainability of the settlement.

### Question SS 6

Should all settlements have some level of development, regardless of whether they are identified in the settlement hierarchy?

Broadly speaking yes, for the reasons set out above.

### Question 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?

We agree that, as a general principle, the existing character of settlements should be protected. It is important however not to conflate “protect character” with “no change”. Accommodating any new development will involve change, but this should not be equated with harm. A balanced approach is required.

We suspect that in many parts of the Borough it will be felt that the capacity of existing services and infrastructure has already reached “capacity”. Thus if this measure was applied as set out in SS8 above, it would be impossible to accommodate the required level of growth over the 15 year Plan period.

Rather than using existing capacity as a restraint and choke on future growth requirements therefore, the Borough should instead adopt a proactive and enabling role, working with partners to secure the delivery of enhanced services and infrastructure so that current availability of essential

infrastructure does not act as an artificial bar to meeting future needs.

### **Question SS 9**

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

Self evidently yes. The Government's changes in NPPF 2024 to the calculation of housing needs, the introduction of “grey belt” as a concept and the other major revisions to national Green Belt policy demand a fresh approach, and a comprehensive reassessment of the extent of Green Belt across CWaC. This should include the boundaries of the Green Belt and the policy applicable to development within the remaining designation.

### **Question SS 10**

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

CWaC will wish to take into account the definition of grey belt and the mandatory obligation now placed upon it to meet housing needs as calculated in line with the latest methodology.

### **Question SS 11**

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
- d. None of these

Of the options presented, we support Option C. This allows a focus on public transport provision and accessibility and so should produce benefits in ensuring new development is, wherever possible, accessible by means of transport other than the car.

**Option A** is clearly unsustainable and inconsistent with national policy advice in the light of NPPF 2024 changes.

**Option B** may have relevance, but reliance on a perpetuation of the current Plans' distribution and approach to settlements does not take into account the significant policy changes which have occurred since that plan was formulated. It is therefore highly unlikely to represent the optimal spatial picture or strategy now.

### Question SS 18

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

Yes, as set out above.

### Question SS 80

Which of the identified potential growth areas around Lostock Gramam station do you consider to be the most suitable?

**Question SS 81**

Do you have any further comments about any of the potential growth areas identified around Lostock Gralam station?

The attached plan shows land within our clients' ownership which lies well within the 800m radius/easy walk of Lostock Gralam railway station. It is immediately available, suitable and deliverable for housing development in the short term. There are no known constraints. A separate submission has been made under the Call for Sites exercise in parallel with this consultation on Issues and Options.

**Question GB 2**

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

Yes. The current approach in the local plan of one policy addressing both Open Countryside and Green Belt has been a cause of confusion in the past. It would be better for there to be two distinct policies.

**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'](#) above? If not please suggest how it could be amended?

Any policy which sets out specific dwelling types/mix of units (for example, the number or percentage of 1-2 bedroom dwellings, as mentioned in the policy) must also ensure that



such a prescriptive approach does not override the need for a scheme to have regard to the nature and character of the settlement in which it is located. Any drive for a certain mix should always be subservient to the need to ensure the scheme is in character with its setting.

### **Question DS 2**

If the Council produces a borough-wide Design Code, should this form part of the new Local Plan?

No. This would be more appropriately a standalone document, to be read alongside the Local Plan (as an SPD for example). This would give greater flexibility, and allow for easier review to keep the document up to date.

### **Question DS 6**

Do you think that the new Local Plan should set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments?

No. National standards are set out in Building Regulations and there is no justification for departing from these in CWaC.

**ENDS**

**Gary Halman** Land and Planning  
August 2025.

