

Local Plan Representations

For Hollins Strategic Land | 22-502

Cheshire West and Chester Local Plan – Issues and Options



Project: 22-502
Site Address: Cheshire West and Chester Local Plan Issues and Options
Client: Hollins Strategic Land
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1. Introduction

- 1.1 This statement sets out the representations of Hollins Strategic Land (HSL) to Cheshire West and Chester Local Plan Review: Issues and Options consultation. HSL is promoting for the last east of School Lane (**LAA Site Ref 0659**) for allocation in the new Plan.



2. Plan Period

Question IN 3 Do you have any comments or views on the proposed plan period for the new Local Plan?

- 2.1 Paragraph 1.23 sets out that the Local Plan should plan for a period of 15 years.
- 2.2 Paragraph 22 of the Framework makes clear that strategic policies are those which make provision for housing, employment and other types of growth:

“Strategic policies should look ahead over a minimum 15 year period from adoption¹⁴, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery¹⁵”

- 2.3 It also requires strategic policies to cover a 15-year plan period **from adoption**:
- 2.4 The Council’s proposed timetable for the adoption of the Local Plan is set out in the 2025 Local Development Scheme which is as follows:

- Consultation Pre-Submission Plan (Publication stage) – Autumn 2026
- Submission to Planning Inspectorate – by December 2026
- Examination in Public – Spring/Summer 2027
- Adoption – Summer/Autumn 2027.

- 2.5 On the basis of the Council’s LDS, assuming adoption in Autumn 2027, the minimum plan period will be the 31st March 2043 so that there is a full 15-year period at adoption. However, this assumes that there are no delays between now and then, which in our view is unrealistic. It is also important to note that Local Plan examinations have historically taken multiple years. Specific examples include the Cheshire East Local Plan Strategy which took over 3 years and the Halton Delivery and Allocations Plan which took 2 years. More recently, Planning Inspectors have paused public hearings being held as part of the examination into the Charnwood Local Plan 2021-2037. This demonstrates the issues and delays can take place during the examination process. This issue has also been recently by the Inspectors for the Wiltshire Local Plan and in their letter dated 27th February 2025 state:

“The revised spatial strategy topic paper (SD/16) shows the Plan period of 2020-2038 commencing in advance of the date of the most up-to-date calculation of Local Housing Need. In that regard, the plan period would look forward around 13 years from the current date which the Council seeks to justify as being 15 years from the date of the



assessments of housing and employment needs. However, paragraph 22 of the Framework (September 2023) expects strategic policies to look ahead over a minimum of 15 years following adoption of the Plan. As a result, the submitted Plan would not appear to look sufficiently far ahead to anticipate and respond to long-term requirements and opportunities.

We identify this matter to you at this early stage as it is clearly a matter of concern and one which will have implications for the rest of the examination, including our consideration of whether the Plan is positively prepared and consistent with national policy with respect to the overall amount of housing and employment land to be identified.”

2.6 We consider that an element of flexibility is built in at the outset and the plan period should be to 2045.



3. Housing Requirement

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

- 3.1 No. The publication of the revised Framework in December 2024 and the new Standard Method sets out a minimum need for 1,914 dwellings per annum. Paragraph 62 of the Framework states:

“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

- 3.2 Local Housing Need is defined in Annex 2 of the Framework:

“The number of homes identified as being needed through the application of the standard method set out in national planning practice guidance.”

- 3.3 Paragraph 003¹ of the PPG states:

“Is the use of the standard method for strategic policy making purposes mandatory?”

The standard method should be used to assess housing needs. However it is recognised that there are some specific circumstances in which an alternative approach could be justified, for example as explained at paragraph 014 below.”

- 3.4 Paragraph 14 of the PPG states:

“Where strategic policy-making authority boundaries do not align with local authority boundaries, or data is not available, should the standard method be used to assess local housing need?”

Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, or local authority areas where the samples are too small, an alternative approach may have to be used.

Such authorities may continue to identify a housing need figure using a method determined locally. In doing so authorities should take into consideration the best available evidence on the amount of existing housing stock within their planning authority boundary, local house prices, earnings and housing affordability. In the absence of other robust affordability data, authorities should consider the implications

¹ Reference ID: 2a-003-20241212



of using the median workplace-based affordability ratio for the relevant wider local authority area(s).

For local authorities whose boundaries cross National Parks or Broads Authority areas, the proportion of the local authority area that falls within and outside the National Park or Broads Authority area should also be considered – for example where only a minimal proportion of the existing housing stock of a local authority falls within the National Park or Broads Authority area it may be appropriate to continue to use the local housing need figure derived by the standard method for the local authority area.”

- 3.5 Paragraph 14 is not applicable in Cheshire West as the authority boundary aligns with the local plan boundary. Therefore, the standard method is mandatory in Cheshire West. As to whether the housing requirement can vary from the standard method, paragraph 040² of the PPG states:

“What is a housing requirement?”

The housing requirement is the minimum number of homes that a plan seeks to provide during the plan period.

Once local housing need has been assessed, as set out in this guidance, authorities should then make an assessment of the amount of new homes that can be provided in their area. This should be justified by evidence on land availability, constraints on development and any other relevant matters.

The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The National Planning Policy Framework explains that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations. Where authorities plan for higher growth this should not normally have to be thoroughly justified at examination.”

- 3.6 Paragraph 40 states that authorities, once they have made an assessment of need, then need to consider land availability, constraints on development and any other relevant matters. The only meaningful policy restraint in Cheshire West has been Green Belt around Chester, but the Government is clear that “authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan”. That is an ongoing process as part of the evidence base but the Government is clear that a Green Belt review must be undertaken. With the potential exception of the Green Belt around Chester, we do not consider that there are any constraints that would result in a

² Reference ID: 2a-040-20241212



conclusion that the standard method cannot be met once the HELAA and Green Belt review has been undertaken given the availability of land around the settlements in the Borough.

- 3.7 With the standard method as a minimum, the only other alternative in the PPG is a higher requirement which is expressly set out in paragraph 14³ of the PPG and paragraph 69 of the Framework which states:

“The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment”.

- 3.8 As part of the local plan evidence base, a Housing and Economic Needs Assessment will be undertaken and that should form part of the Council’s consideration as to the final housing requirement and that should be the subject to consultation.
- 3.9 Therefore, at this stage the housing requirement should be a minimum of 1,914 dwellings per annum with the potential for a higher requirement based on economic development or infrastructure investment.

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?

- 3.10 No. With the substantial shortfall in housing supply at present there will be an uplift in housing delivery as the local plan progresses so that the full annual requirement can be met in the early years with larger strategic sites that are to be allocated increasing supply throughout the plan period. In the period after the adoption of the local plan in 2015, annual completions were:

- 2015-2016 – 1,769 dwellings;
- 2016-2017 – 2,017 dwellings;
- 2017-2018 - 2,542 dwellings;
- 2018-2019 – 1,849 dwellings
- 2019-2020 – 1,849 dwellings.

- 3.11 That level of housing completions was against a requirement of 1,100 dwellings. Therefore, as the new local plan will allocate land for a higher number, we see no reason based on previous delivery that there should be a stepped requirement.

³ Reference ID: 2a-014-20241212



Flexibility/Buffer

3.12 We consider that there should be a buffer of at least 10% which is based on the Local Plans Expert Group report to the Communities Secretary and to the Minister of Housing and Planning where a 20% buffer was recommended. The report recommends at paragraph 11.4 that the Framework should make clear that local plans should be required to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term, plus make provision for, and provide a mechanism for the release of, sites equivalent to 20% of their housing requirement, as far as is consistent with the policies set out in the Framework.

3.13 The Guildford Local Plan 2019 is relevant to the issue of releasing Green Belt to provide flexibility in the housing land supply. A supply of 14,602 dwellings was provided against a housing requirement of 10,678 dwellings, equating to a flexibility allowance of 37%. Of supply, some 6,742 dwellings were to be provided on sites to be released from the Green Belt. The plan was subject to an unsuccessful Challenge⁴ which specifically addressed this point. The Judgment draws the following conclusions under Issue 2: Was the conclusion that there were exceptional circumstances justifying the allocations of housing land, released from the Green Belt, to provide headroom of over 4000 dwellings above the 10678 OAN lawful, and adequately reasoned?

- Once meeting the OAN is accepted as a strategic level factor contributing to “exceptional circumstances”, it follows that the provision of headroom against slippage and for flexibility to meet changes, “future-proofing” the plan, as the Inspector put it, would also contribute to such circumstances (paragraph 91).
- The headroom figure was a judgement based on the sites which were available to meet a requirement figure somewhat over 10,678, and to do so in such a way that, over the initial and subsequent years of the plan, the rolling five year housing supply, with a 20% buffer for some years, would be maintained (paragraph 96).
- As part of the total supply, the Inspector was entitled to conclude that the plan should allocate additional sites, that may be sequentially less preferable than other sites, because they were necessary allocations in order to provide the initial five year housing land supply (paragraph 101).

3.14 We consider that the above key points are broadly applicable to Cheshire West and the Plan must provide sufficient flexibility and there is a need to release additional deliverable sites to provide a five-year housing land supply and ensuring the requirement is met in the plan period. Even if there were to be a degree of over-provision, there would be wider benefits of providing a level of housing in excess of the minimum requirement, namely improving affordability and meeting affordable housing needs.

⁴ Compton PC vs Guildford BC [2019] EWHC 3242 (Admin)



Conclusion

3.15 Option B under SS5 states that “*the government’s new housing target of 28,170 homes*” which is the 1,914 dwellings multiplied by 15 years. However, based on the above, the plan period should be longer as the start date for a plan (which should be 2025) is not the adoption date and with the need for a plan period to 2045 in our view, the housing requirement that this Plan should be meeting is for a 20 year period and should be 38,280 dwellings. With an added buffer of at least 10%, then the Plan should be meeting at least 42,000 dwellings.



4. SS5 Spatial Strategy Options

4.1 The three initial options for growth that the Council have identified are as follows:

- Option A – Retain the Green Belt
- Option B – Follow current Local Plan level and distribution of development
- Option C – Sustainable transport corridors

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

4.2 These representations which focus on Hartford, and the options for Northwich are as follows:

- Option A - 5000+ dwellings
- Option B – 5000+ dwellings
- Option C - 5000+ dwellings

4.3 Under any option that is consulted on Northwich is proposed to accommodate at least 5,000 dwellings and Hartford can provide its proportion share as we now set out.

SS4 Settlement Hierarchy

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

4.4 STRAT2 (Strategic development) of the adopted local plan sets out the settlement hierarchy which is:

- i. edge of the city of Chester and towns of Ellesmere Port, Northwich and Winsford
- ii. key service centres of Cuddington and Sandiway, Farndon, Frodsham, Helsby, Kelsall, Malpas, Neston and Parkgate, Tarporley, Tattenhall and Tarvin.
- iii. An appropriate level of development will also be brought forward in smaller rural settlements which have adequate services and facilities and access to public transport.

4.5 SS4 seeks to continue the overall hierarchy in STRAT2 with a few changes which are that Frodsham and Neston and Parkgate moving up in the hierarchy with Cuddington and Sandiway; Farndon; Helsby; Kelsall; Malpas; Tarporley; Tarvin; and Tattenhall being in the second tier. However, we do note that SS4 does states that depending on the spatial strategy option selected (see SS 5 'Spatial strategy options' A-C) for the new Local Plan, these settlements may be amended.



4.6 For Hartford that remains within the Northwich policy area which can accommodate a significant level of growth which is appropriate to the village and supports its local service function. The Places Background Paper states:

“this is a busy centre within a self contained parade of shops on a main route into Northwich town centre. There is open space opposite the centre and the road is very wide. There is parking along the street and outside the shops. Nearby there is a park and church as well as a train station. In the wider area, a Sainsburys local is also available for local residents. There is a good amount of passing trade, mainly by car. There are buses running through the centre and it is located between two train stations on the route from Chester to Manchester. The centre has a Co-Op and is supported by other smaller shops which mainly operate in the day, but there is a pub and restaurant”

4.7 We consider that further development can be accommodated at Hartford which would be:

- appropriately scaled to the village’s character and capacity.
- Would be serviced by the wide range of existing infrastructure and services.

4.8 Our client’s site is residential development opportunity as we set out in the next section.



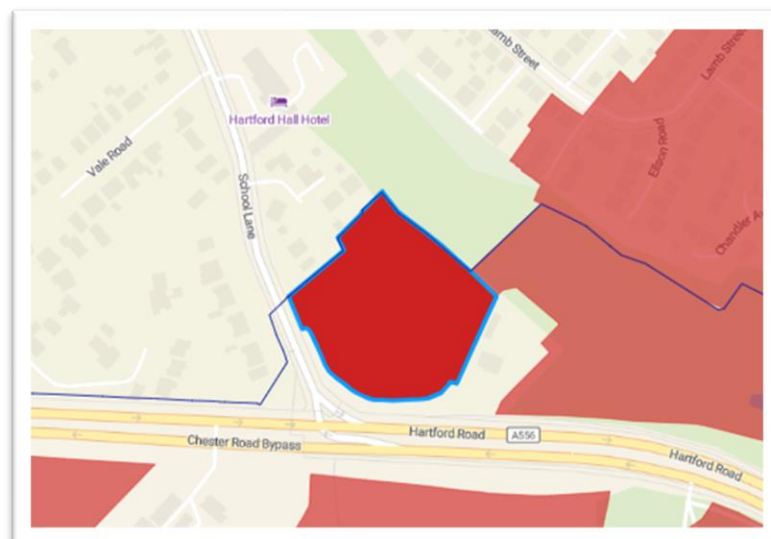
5. Land east of School Lane, Hartford

Question SS 29 Which of the identified potential growth areas around Northwich do you consider to be the most suitable?

- 5.1 HSL has an interest in a site at land east of School Lane, Hartford. A location plan of the site is set out below.



- 5.2 In the Land Availability Assessment, the site is **Site Ref 0659**.



5.3 As the options are not on an OS Base it is not clear on boundaries for sites, although the LPA has confirmed that “the potential capacity shown for the growth areas does not reflect the individual sites that are in the Land Availability Assessment”. NOR08 is mainly south of the A556 but extends to the north. Notwithstanding, our client’s land is a small discreet parcel of land in the open countryside and its allocation is not dependent on the allocation of wider strategic parcels.

Principle of development

5.4 The site is currently the subject of a planning application for 24 no. dwellings (22/04272/OUT). The site illustrative site layout plan that accompanies the application shows a range of property sizes.



5.5 The site comprises a paddock measuring 1.3 ha in area. The application site is bound to the west by School Lane and to the south by the A556. To the north the site is a number of dwellings accessed via Quantways, and to the south-east, by the dwelling and associated domestic buildings at High Acre.



- 5.6 To the north-east the site is immediately bounded by a buffer area of self-seeded woodland beyond which is a large on-going residential development being undertaken by Redrow, marketed as Water's Reach.
- 5.7 The site slopes from west to east / south-east. Further details on the site topography is contained within the Flood Risk Assessment (FRA) and Drainage Management Strategy (DMS) that accompany the application.
- 5.8 The site immediately adjoins, but sits outside of, the south-east edge of the defined settlement boundary of Hartford. For the purposes of housing distribution, Hartford, together with other adjacent settlements, fall under the 'Northwich area', where at least 4,300 new dwellings should be delivered over the plan period.
- 5.9 Hartford, and the application site, are considered sustainable locations for new housing development. Further details on the sustainability credential of the site are set out within the supporting Transport Statement that accompanies the application.
- 5.10 Unlike the remainder of the settlement boundary of Hartford and nearby Davenham, whereby the boundary to the countryside is formed along the alignment of the A556, the application site sits within an anomalous parcel of land, sandwiched between the A556, the River Weaver and the remainder of Hartford. Visually and functionally the site forms part of Hartford.
- 5.11 Therefore, in terms of its relationship with the existing settlement, the development can form a logical extension to the built form of the settlement.

Technical

Highways

- 5.12 Access to the application site is currently via a gated field access off School Lane. A Transport Statement has been prepared by Eddisons to consider the development in transport and highways terms in order to provide the local highway authority with the necessary reassurance that the proposals can be accommodated by the local transport network.

Ecology

- 5.13 An Ecological Survey has been undertaken by ERAP which is a desktop study and data search, an extended Phase 1 Habitat Survey and surveys for relevant protected species carried out. The scope of survey undertaken is appropriate to identify potential ecological constraints and has facilitated the application of the mitigation hierarchy to inform the Illustrative Masterplan. The collated baseline surveys have informed



the scope of recommendations and actions to be applied to secure maximised opportunities for biodiversity as part of the development proposals.

Flood Risk and Drainage

- 5.14 Betts Hydro Consulting Engineers has prepared a Flood Risk Assessment and Drainage Management Strategy. The FRA confirms that the site is located in Flood Zone 1 and is at 'very low' to 'low' risk from flood sources, including surface water run off. Any potential residual flood risk would be effectively managed as part of the proposed development through the mitigation measures proposed in the FRA.
- 5.15 In terms of the drainage strategy, the principle focus of this assessment is on the sustainable management of surface water run-off to ensure no increased flood risk results from the development. The surface water discharge options have been assessed in accordance with the sustainable drainage hierarchy. The proposals are to mimic the existing situation and where infiltration over time is not viable, implement a formal connection into the land drainage ditch located 35m north-east of the site.

Landscape

- 5.16 Whilst the application site is within the open countryside, it sits immediately adjacent to the settlement area boundary. The inclusion of the site within the open countryside appears anomalous, given it is bounded on all sides by existing development and visually and functionally forms part of Hartford. The development would be seen as a natural continuation and completion of this part of the residential area with minimal effects on landscape and townscape character and on the visual amenity of receptors.

Conclusion

- 5.17 The site is an extension to Hartford and there are a range of benefits, which are:
- the delivery of 17 market housing;
 - the delivery of 7 affordable homes;
 - a well contained site adjacent to Hartford;
 - delivery of a small sized site which would accord with the clear objective of the Government in paragraph 73 of the Framework;
 - economic benefits during construction and the additional spend to local services and facilities from the occupants of the homes.
- 5.18 We consider the site should be allocated in the emerging local plan.



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