

# ISSUES AND OPTIONS RESPONSE

LAND TO THE NORTH OF SCHOOL LANE, GILDEN SUTTON, CHESHIRE

BECK HOMES

2025-016

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## Signing off Sheet

**Client:** Beck Homes  
**Project:** Land to the north of School Lane, Guilden Sutton  
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### Final

#### Authorised for and on behalf NJL Consulting

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Managing Director

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# 1. Introduction

- 1.1 This Statement has been prepared in response to Cheshire West and Chester Council (the 'Council') Issues and Options Consultation (2025), in relation to our client, Beck Homes (the 'Developer') interest in Land to the north of School Lane, Guilden Sutton, Cheshire (the 'Site').
- 1.2 Overall, Beck Homes considers that several of the proposed options within the consultation document are positive and can enable required levels of growth. It remains critical, however, that ambitious economic growth and housing need are fully aligned in order to deliver the most sustainable patterns of development, and we comment on the consultation on this basis.
- 1.3 These representations comment in relation to Beck Homes site in Guilden Sutton (Figure 1) in relation to the proposed spatial strategy, as well as wider commentary on policy proposals within the Issues and Options consultation document.



*Figure 1 Aerial View of the Site*

## 2. Site Context

2.1 The site is located within the administrative area of Cheshire West and Chester Council and comprises approximately 2.27 hectare (5.6 acres) of greenfield agricultural land. It is situated immediately north of Guilden Sutton, directly adjoining the existing settlement boundary. The site represents an infill site immediately adjoining the existing settlement of Guilden Sutton, being enclosed by existing residential development to the east, south, and west. To the north, there are agricultural fields and open countryside. Further north is the settlement of Mickle Trafford, located approximately 1km from the site boundary, and physically separated by the Mid-Cheshire railway line.

2.2 In terms of key site characteristics, these are summarised as follows:

- **Access:** The site is accessible via School Lane, which provides direct connectivity westward to the centre of Chester via Guilden Sutton Lane and Hoole Lane.
- **Heritage:** There are no listed buildings within or close to the site. The nearest is the Grade II Listed 'Church of St John the Baptist', circa 225m from the site boundary, which is located within the heart of the village. Noting the surrounding residential context the site bears no relationship or contribution to the setting of this designated heritage asset.
- **Flood Risk:** The site lies entirely within Flood Zone 1 and at low risk of surface water flooding, albeit the northern boundary of the site is identified within the updated EA flood risk mapping as being at risk of surface water flooding in the most extreme 1 in 1,000-year scenario.
- **Ecology:** The site does not fall within any statutory ecological designations.
- **Trees and Hedgerows:** Tree Preservation Orders (TPOs) are in place along the School Lane boundary, protecting four mature oak trees.
- **Landscape / Topography:** The site is located within the Green Belt.

2.3 The ambition for the site is to deliver a high quality, sustainable residential development. The developer is currently exploring options for a policy compliant mix to 100% affordable housing.

### 3. Issues and Options Consultation Response

#### Implementation

***(IN 1) Do you agree that this is the right evidence that we need to inform the new Local Plan? Is there further evidence that you think will be required?***

3.1 Beck Homes agree that the listed evidence base is appropriate, however the Green Belt Study should include a detailed parcel-by-parcel assessment of land around Guilden Sutton as with all settlements, explicitly considering:

- The relative contribution of each parcel to Green Belt purposes (as set out in NPPF para 143).
- Accessibility to sustainable transport.
- Capacity to deliver housing without causing coalescence of settlements.

#### Spatial Strategy

***(SS 1) Is there any reason for the Council not to deliver the 1,914 dpa required?***

3.2 The Council should be planning for at least the 1,914 dpa as required under the Standard Method figures published in 2024. Any figure above this base level will ensure Cheshire West and Chester (CWAC) can address the shortfall in affordable housing provision and the need to sustain future economic growth in the borough.

3.3 Contextually, under the previous NPPF method, the annual housing target for Cheshire West and Chester was 532 dwellings annually. Under the standard method established within the new NPPF and updated figures published in March in line with affordability ratios, the annual housing target for the Council is 1,912 dwellings per year.

3.4 As the Council's strategic policies are more than five years old, paragraph 78 is also highly relevant: the Council needs to demonstrate a five-year supply against the standard method (taken from Planning Practice Guidance). Using the Council's latest land supply figure and published affordability, the 5-year calculation is as follows:

- Annual Requirement = 1,912
- 5-year Requirement = 9,560
- Plus 5% buffer = 10,038
- Deliverable Supply = 4,209
- Years Supply = **2.09 years**

3.5 The shortfall in supply is therefore chronic and needs to be addressed through emerging Local Plan.

3.6 In terms of the figure suggested through the policy, it is important to note how 'exceptional circumstances' need to be shown to justify an alternative approach to the standard method. Crucially as the PPG states (summarised below), it is only for a

housing need figure which is lower than standard method for which 'exceptional' justification needs to be shown. A higher figure is not as rigorously tested.

- 3.7 The PPG states "*The standard method uses a formula to identify the **minimum number of homes** expected to be planned for. The standard method...identifies a minimum annual housing need figure. It does not produce a housing requirement figure.*" (NJL emphasis).
- 3.8 The PPG emphasises how the assessment of need must be carried out separately and prior to the determination of a housing requirement. Furthermore, the PPG refers to exceptional circumstances being required to justify housing need which is below the Standard Method minimum.
- 3.9 In contrast the PPG states how a range of circumstances may justify the determination of housing need which exceeds the standard method minimum, and that an assessment of need which establishes a figure which is higher than the standard method minimum will be considered sound if it "*adequately reflects current and future demographic trends and market signals.*"
- 3.10 It is therefore important to consider whether any factors justify an increase in the standard method minimum when determining housing need but at the very least there is no reason as to why the Council should drop below the identified dwellings per year as set out.

**(SS 2) Do you think the Council should consider a stepped housing requirement that plans for lower level of housing delivery earlier in the plan period?**

- 3.11 The PPG states: "*A stepped housing requirement may be appropriate where there is to be a significant change in the level of housing requirement between previous policies and / or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period. Strategic policy-makers will need to identify the stepped requirement in strategic housing policy, and to set out evidence to support this approach, and not to unnecessarily delay meeting identified development needs. Stepped requirements will need to ensure that planning housing requirements are met fully within the plan period. In reviewing and revising policies, strategic policy-makers should ensure there is not continued delay in meeting identified development needs.*"
- 3.12 CWAC reported in their latest Housing Monitoring Report (2024-2025) that in the last three years completions were as follows;

<b>Year</b>	<b>2022-2023</b>	<b>2023-2024</b>	<b>2024-2025</b>	<b>Total</b>
<b>Number of homes required</b>	567	532	504	1,603
<b>Net annual completions</b>	1,401	1,366	1,215	3,982

- 3.13 It is clear that, as a Council, they have been performing well against their previous requirement and delivering homes significantly higher year on year. As such, the revised target of 1,914 as set out in SS 1 should not be a significant jump in what the Council can provide if suitable sites are proposed through the emerging Local Plan.
- 3.14 As set out through the following questions, whilst one spatial option is to deliver homes through larger strategic sites that could see slower or phased delivery whereby a stepped housing requirement could be suitable, we are of the view that this option should not be the preferred route. This would not allow for a distribution that suits identified needs throughout the borough.

3.15 As such, we would not suggest that the Council consider a stepped housing requirement and that it should be aspirational in its approach to setting their housing requirement at the identified level of 1,914 or higher to ensure and support early delivery of housing over the plan period.

**(SS 4) Do you agree with the suggested policy approach toward the spatial strategy principles, as set out in SS3 'Spatial strategy principles' above? If not, please suggest how it could be amended?**

- ***Direct new development and allocating land toward previously developed sites in settlements first.***
- ***Where not sufficient, develop on the edge of existing settlements in locations with the best access to public transport and existing services and infrastructure. This may require release of Green Belt land.***

3.16 Given limited brownfield capacity, targeted Green Belt release around sustainable settlements such as Guilden Sutton is essential to meeting this target. Whilst reviewing previously developed land first aligns with the principle of sustainable development as does promoting development that is well distributed and ensures needs around Cheshire West are fully met. As such, both aims as above should be developed side by side to ensure a comprehensive approach to the Local Plan spatial strategy.

**(SS 5) Do you agree with the suggested policy approach toward the settlement hierarchy, as set out in SS 4 'Settlement hierarchy' above? If not, please suggest how it could be amended.**

3.17 The proposed settlement hierarchy sets out the key settlements as Chester (City), Ellesmere Port (Main Town), Northwich (Main Town), Winsford (Main Town), Neston and Parkgate (Market Town) and Frodsham (Market Town). Each of these settlements will have individual place-based policies within the emerging Local Plan.

3.18 Additional settlements are also identified as able to meet the day-to-day needs of residents and those in surrounding areas. Beyond this, the hierarchy notes that smaller settlements could acceptably accommodate infill development and small previously developed sites.

3.19 We agree with the proposed settlement hierarchy however, in principle, no settlement should be excluded from development, provided that their character is protected by high-quality planning and design, they are situated on routes on which public transport can be made sustainable, and local facilities can be provided.

3.20 Such development could actually benefit the sustainability of some settlements and bring forward additional services and facilities depending on what is required from additional housing or economic development. As such, we agree that it is necessary for smaller settlements to accommodate some growth.

**(SS 6) Should all settlements have some level of development, regardless of identification within the settlement hierarchy?**

3.21 The population growth of CWAC cannot be addressed by larger settlements only with smaller settlements having their own demographic needs based on their specific housing market sub-area and past housing delivery.

3.22 As highlighted before, we recommend the emerging Local Plan aims for more than the minimum housing need figure but should use this as the starting point with the minimum need in each area must be met and exceeded.

3.23 Therefore, in terms of distribution, we recommend housing is distributed in a manner which ensures the minimum housing need specific to each sub area of the borough and smaller settlements with sustainable offer should be identified. It is notable that some settlements may have transport benefits through rail, but not services (e.g. Acton Bridge and Hooton), so are less logical to look at them for more housing. Whilst other settlements (e.g. Guilden Sutton) have more services and are sustainably connected through other forms of public transport (e.g. bus) and should be considered positively for more housing.

**(SS 9) Have circumstances changed since the adoption of the Local Plan (Part One), that would now justify Green Belt release?**

3.24 Green Belt release is critical in CWAC to provide the level of housing that has been identified at a minimum through the Standard Method calculation and allow for housing to be distributed effectively throughout the borough and not simply towards larger settlements that are not located within the Green Belt.

3.25 The NPPF sets out that in exceptional circumstance, such as in instances where an authority cannot meet its identified need for homes, commercial or other development through other means, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full.

3.26 Given the scale of housing uplift and the large swathe of the borough currently located within the Green Belt, it is likely that additional land will be sought and CWAC will need to undertake their Green Belt review and additional housing needs evidence to support this.

3.27 In the context of Exceptional Circumstances, we consider the land north of School Lane, Guilden Sutton should be allocated for housing.

3.28 As detailed through our response to SS 6, smaller settlements which have appropriate transport connections and services should be able to accommodate the delivery of homes.

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

- **Option A - Retain the Green Belt**
- **Option B - Follow the current LP level and distribution of development**
- **Option C - Sustainable Transport corridors**
- **None of these**

**(SS 12) Do you have any alternative spatial strategy options that you would like to suggest?**

3.29 We do not consider that any single option, as presented in the document, as the most appropriate spatial option and an alternative spatial option is detailed below.

3.30 From a review of all options, an alternative strategy could combine the strengths of Options B (distribution across the settlement hierarchy) and Option C (focus on sustainable transport corridors), while avoiding too much of a focus on a large urban extension only approach. By doing so an alternative approach would:

- Prioritise brownfield and urban regeneration sites where available.

- Direct growth to main towns (Chester, Ellesmere Port, Northwich, Winsford) but avoid an over reliance on a few very large urban extensions.
- Support medium-scale growth at rail-served villages and key service centres (e.g. Guilden Sutton, Cuddington & Sandiway, Helsby, Frodsham, Tarporley) through targeted Green Belt releases.
- Allow smaller, proportionate growth in Local Service Centres and rural settlements to sustain schools, shops, and services.

3.31 The benefits of an alternative proposition would be as follows:

- Deliverable: it would avoid an over-reliance on a few large, infrastructure-heavy urban extensions that could delay.
- Sustainable: it would support travel by train and bus, reduces car dependency, and strengthen smaller communities whereby development supports improved infrastructure.
- Balanced: by doing so it would allow growth to be distributed fairly across towns, villages, and the rural area.
- Defensible: it still allows for targeted Green Belt release where contributions to the Green Belt purposes to not strongly contribute.

3.32 Overall, the key to this approach would be to spread growth across multiple settlements which reduces risk and ensures flexibility if some sites don't come forward as planned.

***(SS 13) From those settlements identified in the Spatial Strategy options; should new housing/employment be allowed in other settlements? Specify type of development for example infill.***

3.33 Yes, there will be a need to allow for new housing and employment land in other settlements. Smaller settlements are appropriate locations for limited infill or extension developments for housing and in some circumstances for commercial development; particularly in rural areas where this would support rural and small-scale businesses.

3.34 This will contribute to meeting the overall housing needs of the plan period, as well as support the vitality of rural villages and towns.

***(SS 14) Do you feel that Option A is an appropriate spatial strategy for the new Local Plan?***

3.35 Beck Homes do not agree with this option, as whilst this in theory could meet the longer-term housing needs providing it is viable, it does not address short term acute housing needs in the borough. The fundamental aim of the NPPF requires sustainable development which in turn requires sustainable patterns of development that link to jobs and economic growth around peoples needs.

3.36 This option heavy relies on Large urban extensions as part of its strategy for over 55% of its housing requirement. These often require substantial upfront infrastructure investment (e.g. new highways, schools, GP capacity, utilities). The consultation document acknowledges significant pressures on transport networks, school places, and healthcare across the borough. These costs can:

- Delay delivery of housing, undermining the Council's five-year supply.

- Reduce viability for affordable housing and community facilities.
- Concentrate pressure on single locations rather than distributing growth sustainably.

3.37 This is particularly relevant to the proposed 11,000+ homes to the south/west of Winsford. The existing Local Plan, alongside the Winsford Neighbourhood Plan, allocated land to the south/east of Winsford for 1,000 new dwellings, to be known as the Station Quarter. Of this allocation, just 215 homes have been approved, with the final homes still to be completed. As such, it is unlikely that Winsford would deliver the proposed additional large urban extension, as it is significantly behind in the delivery of Station Quarter and is unlikely to create a meaningful impact on housing numbers earlier in the plan period.

3.38 Focusing growth on a small number of large extensions risks creating an imbalanced settlement hierarchy, with an over-concentration of growth in a few towns, continued under-investment in smaller but sustainable settlements (such as smaller settlements like Guilden Sutton) and a lack of flexibility if one or more large extensions stall in delivery.

3.39 Further, it only addresses housing needs within the large settlements whereas the smaller settlements which still have specific housing requirements, do not see additional development. The strategy should support equal distribution to ensure suitable delivery with supporting facilities as needed. Option A is therefore inappropriate due to the poor distribution across the district and the over reliance on long-term strategic extensions.

**(SS 15) If you do not feel that Option A is an appropriate spatial strategy option, are there any changes could you suggest?**

3.40 Beck Homes suggest pursuing a combined approach with Option B and C as detailed in the following responses.

**(SS 16) Do you feel Option B is an appropriate spatial strategy for the new Local Plan?**

3.41 For Housing Development, Option B includes:

- Large urban extensions around: Chester, Ellesmere Port, Northwich and Winsford.
- Total Green Belt release of sites to deliver 11,000 homes.
- Relatively limited development in Cuddington and Sandiway, Farndon, Frodsham, Helsby, Kelsall, Malpas, Neston and Parkgate, Tarporley, Tarvin and Tattenhall of 3,000 homes in total.
- 2,500 homes across the rest of the rural area, including both Green Belt and non-Green Belt land.

3.42 The allocation of development within Chester is supported and should be developed further; however, the overall distribution should be considered to account growth in smaller settlements around Chester, such as Guilden Sutton, in order to enable faster delivery and ensure a range of housing is available to meet the needs of Chester's communities.

**(SS 17) If you do not feel that Option B is an appropriate spatial strategy option, are there any changes that you could suggest?**

3.43 Beck Homes suggest pursuing a combined approach with Option B and C as detailed in the following responses.

**(SS 18) Do you feel that Option C is an appropriate spatial strategy for the new Local Plan?**

**(SS 19) If you do not feel that Option C is an appropriate spatial strategy option, are there any changes that you could suggest?**

3.44 For Housing Development this option includes:

- A wider distribution pattern of development
- More modest urban extensions around Chester, Ellesmere Port, Northwich and Winsford.
- Smaller settlements with a rail station, such as Cuddington & Sandiway, Helsby, Frodsham and Neston and Parkgate would take a bigger role in accommodating development.
- Total Green Belt release of sites to deliver 12,000 homes.
- Potential for further development in rural area and in places along bus corridors including: Farndon, Malpas, Tarporley, Tarvin and Tattenhall.
- Potential for enhanced role around rural rail stations including; Acton Bridge, Capenhurst, Delamere, Elton, Hooton, Lostock Gralam and Mouldsworth.

3.45 Option C provides a strong basis for a spatial strategy, directing growth to settlements served by strong transport infrastructure (e.g. Chester and its surrounding areas including Guilden Sutton). This is supported as it reduces car dependency and provides access to sustainable travel with Guilden Sutton being served by the number 26 bus route which links to Chester and Ellesmere Port. Chester Train Station is approximately three miles west of the site, which is easily accessible by a 20-minute cycle or a 10-minute commute via bus/car.

3.46 However, Option C currently fails to identify sufficient land to support an appropriate amount of growth for Chester, in accordance with the Settlement Hierarchy and economic ambitions.

3.47 Furthermore, the sites identified for development around rural rail stations fail to fully consider the principles of sustainable development; many of the locations would be unsuitable for housing due to a lack of services and facilities.

3.48 As such, Option C is not an appropriate spatial strategy in its current form. We would advocate on an alternative approach utilising the same principles but drawing in an element of Option B whereby the strategy establishes a greater distribution level but is also where it is most logical and appropriate.

**(SS 20) Do you think the potential 'showstopper' constraints identified above, are correct or are there any others that we should consider?**

3.49 The proposed constraints are as follows:

- Local Green Spaces
- Designated habitats sites
- SSSI's
- Irreplaceable habitats
- Designated heritage assets
- Key settlement gaps

- Areas of Special County Value
- Strategic open space
- Areas of Flood Risk
- Significant hazard zones

3.50 The proposed constraints do not necessarily need to be seen as 'showstoppers' to development, however it is clear that sites absence of these constraints would be preferred for development.

***(SS 21) What information should we take into account when assessing sites for allocation in the new Local Plan?***

3.51 Constraints should include only those with a direct and demonstrable impact on deliverability such as designated habitats, flood risk and heritage assets. A sites Green Belt designation itself should not be an automatic bar if the parcel makes a limited contribution to Green Belt purposes and can be well designed through masterplanning to deliver appropriate levels of housing alongside improved landscaping and open space.

***(GB 1) Do you agree with the suggested policy approach towards Green Belt and countryside, as set out in GB 1 'Green Belt and countryside' above? If not please suggest how it could be amended.***

3.52 The approach to the Green Belt and Countryside is supported, insofar as the inclusion of policy and/or guidance around the approach development in these areas particularly around the new Grey Belt policy proposition set out in the NPPF.

3.53 The Grey Belt is an important part of the Labour Government's strategy to deliver 1.5 million homes in 5 years. The Grey Belt should be carefully considered and should enable the delivery of land not just previously developed, but also greenfield sites that no longer serve the purposes of the Green Belt.

3.54 However, STRAT 9 is unnecessarily restrictive, and should be amended to reflect the approach within DM 19 and the NPPF, in order to enable appropriate development to meet identified housing need, and regenerate previously developed land.

3.55 The NPPF sets out clear requirements for land within the Green Belt and should be adhered to within any forthcoming policy.

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

3.56 The separation of the policies will enable a bespoke approach to the Green Belt, increasing protection and placing greater importance on the purposes of the Green Belt (particularly the prevention of urban sprawl, coalescence of settlements, and protection of historic character).

3.57 In turn, policy in relation to the countryside can be expanded to consider additional appropriate uses, and to place importance on the visual and ecological importance of the countryside.

**Introduction**

***(IN 1) Do you agree that this is the right evidence that we need to inform the new Local Plan? Is there further evidence that you think will be required?***

- 3.58 We agree with the evidence base proposed, however there is a clear need for the evidence base to include an up-to-date Open Space Assessment, to support Policy OS 1.
- 3.59 Furthermore, we would expect that the Green Belt Study to be prepared include a parcel-by-parcel assessment of land around Guilden Sutton, establishing the sites contribution to the Green Belt in accordance with the purposes as defined within paragraph 143 of the NPPF. Each assessment should also consider constraints and opportunities of each parcel, such as capacity, sustainable transport and ecological designations.

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

- 3.60 The proposed plan period of 15 years is supported, assuming this is 15 years from adoption; however, in order to appropriately plan for housing delivery within this period and longer term aims, further consideration is required.
- 3.61 We have previously commented that the proposed options for growth, in particular option A, proposes growth through major extensions, which would not be suitable for delivery with the plan period due to significant infrastructure required, particularly in the case of Winsford.

**Vision**

**(V 2) Should the vision include/establish a set of principles and priorities? Are these the right ones – do you have any other suggestions?**

- 3.62 VI 1 proposes the following principles:
- Tackling Climate Change: adapting to and mitigating against the effects of climate change and achieving a net increase in biodiversity.
  - Promoting Wellbeing: enabling all to enjoy safe and healthy lifestyles with a good quality of life.
  - Providing Infrastructure: Ensuring the provision of appropriate infrastructure in suitable locations to make Cheshire West and Chester a good place to live.
  - Protecting Character: protecting the special character of the Cheshire countryside and its villages.
- 3.63 The proposed principles align with National policy, and we would agree with their inclusion within the Local Plan. However, in addition to the proposed principles, we believe it is necessary to include the delivery of housing as a priority.
- 3.64 The provision of dwellings is fundamental to the Local Plan; the NPPF describes the purpose of plans to be "*a framework for meeting housing needs and addressing other economic, social and environmental priorities*". It is evident therefore that the Local Plan's primary purpose is to ensure the delivery of housing in accordance with housing need.
- 3.65 As such, we would propose that a principle is required to ensure the delivery of housing, in appropriate locations, in order to meet local housing need, complement and support economic growth and enable local residents a choice in housing.

**Housing**

**(HO 1) 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?**

- 3.66 It is key to combine the existing approach based on up-to-date evidence alongside market knowledge to deliver the best opportunities for housing mix.
- 3.67 Policies for older persons and specialist housing, including the optional technical housing standards, should be based on evidence of need and tested for viability.
- 3.68 Opportunities for sites for older persons housing / specialist housing could be identified in masterplans for strategic sites but there must be a mechanism to allow for alternative development where demand is not expressed. Site allocations should satisfy criteria such as proximity of sites to public transport, local services and facilities, health services and town centres.

**3.69 (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?**

- 3.70 Beck Homes agree that a percentage approach should be given to provide guidance to what is expected and needed in the borough. However, this should be a flexible approach given changing needs throughout the plan period and allow for evidence to be provided at the time of submission of an application if any deviations from mix, type or specialist housing is required. At most, a percentage approach would need to enable a range of percentages (e.g. 5-10%) to account for individual site needs and constraints.
- 3.71 A flexible approach also requiring consideration against the Housing Needs Assessment (or any such later document) would enable sites to more accurately meet local market demands and respond to updated assessments in real time.

**(HO 4) Do you agree with the suggested policy approach towards delivering affordable housing, as set out in HO 2 'Delivering affordable housing' above? If not please suggest how it could be amended?**

- 3.72 The policy as written suggest the intention to reflect the government's requirement for housing sites in the Green Belt to provide at least 50% affordable housing.
- 3.73 The amount of affordable housing a scheme can provide depends on the overall viability of a project and a flexible approach is needed to take account of the circumstances of individual schemes. The approach should be justified by up-to-date evidence of need and viability tested as deliverability should not be compromised by over ambitious requirements.
- 3.74 There is a need to identify the areas where affordable housing is most needed and take a flexible approach where need is greatest.

**Health and Wellbeing**

**(HW 3) Should we consider reviewing the separation distances between facing windows of main habitable rooms, as set out in current Local Plan (Part Two) policy DM 2 Impact on residential amenity, and include them in a policy in the new Local Plan?**

- 3.75 Whilst we recognise the importance of separation distances in order to protect residential amenity and prevent overlooking, we believe that this would better be served as part of a design guide or supplementary guidance document (SPD).

- 3.76 An SPD would enable the LPA to review appropriate separation distances across a range of locations and types of development, in order to respond to individual needs across the district.

***(HW 4) What is an appropriate quantity of outdoor amenity space to be provided in new development? What approach should we apply to apartments/flats?***

- 3.77 It is essential that new developments, particularly major developments, provide an appropriate level outdoor amenity space, or public open space. As with HW 3, this is something that could be progressed in detail within an outdoor amenity and open space SPD, establishing thresholds, requirements and exceptions for outdoor amenity and open space within new developments.
- 3.78 This may include garden sizes, POS thresholds and play requirements.

**Open Space**

***(OS 1) Do you agree with the suggested policy approach toward open space, sport and recreation, as set out in OS 1 'Open Space, sport and recreation' above? If not, please suggest how it could be amended?***

- 3.79 The proposed approach requires major residential development to include provision of open space, sport and recreation in accordance with current policy DM35, and for contributions to be required for playing pitches based on additional demand.
- 3.80 The policy will also follow a space hierarchy of: on-site, off-site, financial contribution.
- 3.81 We agree with the policy approach to protect, manage and enhance open spaces, sport and recreational facilities, and agree with the spatial hierarchy. However, protection must be balanced with meeting housing needs. Releasing carefully chosen Green Belt land along the urban edge of settlements, such as land at School Lane, provides an opportunity to secure new and enhanced open space and recreation provision as part of a comprehensive development and provide more direct access to sport and recreation facilities to the benefit of the wider area.
- 3.82 However, the required provisions (in line with DM35) must be reviewed and updated in accordance with a new Open Space Assessment. The most recent assessment was undertaken in 2016, covering the period to 2030. As such, the assessment does not reflect the current position, and the emerging plan will extend well over the current period.
- 3.83 As such, the evidence base should be updated, and policy requirements reflected.

**3.84 (OS 3) Is the current evidence sufficient or does it require updating (Open Space Study and Playing Pitch Strategy)?**

- 3.85 As previously noted, the Open Space Study requires updating to inform the required provision of open space for new development. This approach is set out under NPPF Paragraph 103 whereby it is clearly set out that Planning policies should be based on robust and **up to date** (NJL Emphasis) assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from these assessments should then be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.
- 3.86 The Playing Pitch Strategy was updated in February 2025 and as such is considered appropriate to inform the emerging Local Plan.

## **Green Infrastructure**

***(GI 1) Do you agree with the suggested policy approach towards green infrastructure, biodiversity and geodiversity, as set out in GI 1 'Green infrastructure, biodiversity and geodiversity' above? If not, please suggest how it could be amended?***

- 3.87 The proposed approach is supported, in so far as it would protect and enhance green infrastructure, biodiversity and geodiversity.
- 3.88 However, the LNRS proposed Hedgerow section should include 'where possible' with regards to external hedgerow. Hedgerow boundaries may not be appropriate for a number of reasons, and so the policy must be designed to allow for flexibility where necessary.

***(GI 2) Should new development contribute to woodland in Cheshire West and Chester? Is a 2:1 tree replacement ratio enough for a tree replacement policy?***

- 3.89 The ambition to increase tree cover within the district is supported, and where sites form part of woodland, it is reasonable to require developments to contribute to the maintenance/enhancement elsewhere if this is to be lost.
- 3.90 The 2:1 tree replacement policy is supported as a reasonable and realistic measure.

***(GI 3) Should new Local Plan policy go above the 10% mandatory biodiversity net gain set nationally?***

- 3.91 The Environment Bill set out to require a 10% net gain as a significant benefit to the protection and enhancement of development sites and where not possible on site, land banks across the country.
- 3.92 Achieving a 10% net gain requires significant investment as well as land to deliver required habitat units. An uplift from this baseline figure will result in further development requiring expensive off-site units, which could impact on viability and other essential developer contributions (such as affordable housing) will be lost.
- 3.93 As such, the 10% net gain should be maintained and not increased.

## 4. Conclusion

- 4.1 These representations, submitted on behalf of Beck Homes, comment primarily on the suitability of proposed spatial strategy, with specific reference to their site north of School Lane, Guilden Sutton, Cheshire. Comments are provided specific to other key themes within the Issues & Options document.
- 4.2 In summary, we feel the emerging Plan must consider the following:
- Ensuring the housing distribution correlates with need and is not distributed unevenly.
  - The emerging Local Plan should look to provide more than the minimum housing need to ensure growth potential is maximised within CWAC.
  - Employment growth is met in full within each Local Authority area.
  - The two key themes of employment growth and housing are considered in conjunction to ensure economic growth is not restricted and that housing is provided to accommodate growth expected.
  - In consideration of the above, suitable housing allocations should be provided particular emphasis must be placed on providing more homes in Guilden Sutton due to the large housing need.
- 4.3 Therefore, the Council must ensure suitable housing sites are allocated to help meet the growth expected in this area of CWAC with the site detailed through this representation as one particular example.
- 4.4 The Site, as highlighted in this document, is sustainably located and no technical constraints exist to prevent delivery of the site. It is plainly suitable for housing and would meet the housing needs of Guilden Sutton.
- 4.5 We trust this document is considered as part of the Local Plan preparation and we welcome the opportunity to discuss any of the content within this representation note (both in regard to the suggested growth areas, or general comments regarding the Issues & Options document) to help CWAC produce a sound Local Plan.

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party. Any such party relies on this report at their own risk.

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