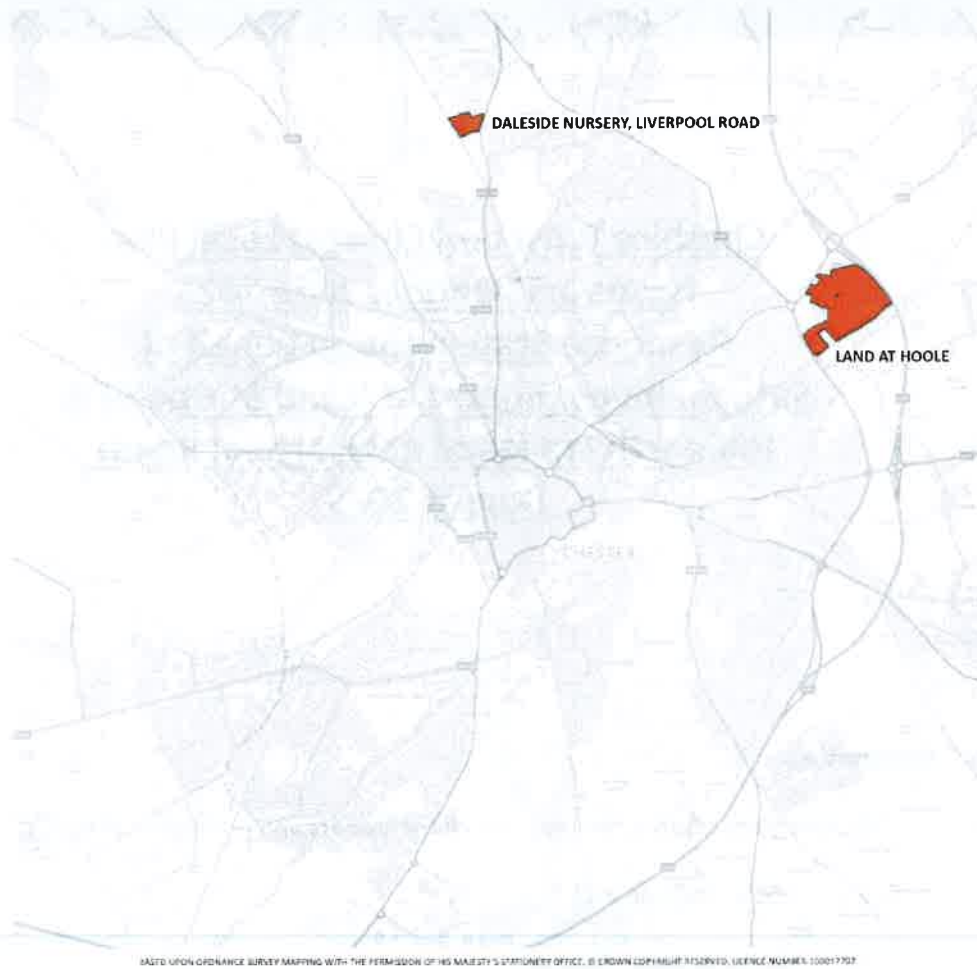


Cheshire West and Chester Local Plan
Issues and Options June 2025
Response Statement on behalf of
Satnam Investments Ltd (Land at Hoole) &
Hillmarch Ltd (Land at Liverpool Road)
August 2025

1. Introduction.

- 1.1 This statement sets out the response of the owners and promoters of land at,
- 1.1.1 Hoole, Chester, and
 - 1.1.2 Liverpool Road, Chester
to the Issues and Options Document published for consultation by the Council in July 2025.
- 1.2 In summary both sites are immediately available for residential led development, capable of delivering completions within 5 years.
- 1.3 Both sites are within the areas identified as suitable for development in the Chester Growth Options, CH02 and CH01, required as part of suggested Options B & C.
- 1.4 Both sites are currently located within the designated Green Belt. Land at Hoole is located on the eastern edge of Chester, adjacent to the settlement boundary and immediately south of the Hoole Island Junction (Junction 12 of the M53 motorway). The former Daleside Nursery site is located on the north-western edge of Chester, between Liverpool Road to the east and the operational railway line to the west. Both sites are sustainably located on the edge of the City of Chester and are deliverable, available and achievable for housing to help meet CWaC's identified housing needs.

Figure 1 Location of Satnam's land interests in relation to the wider settlement of Chester



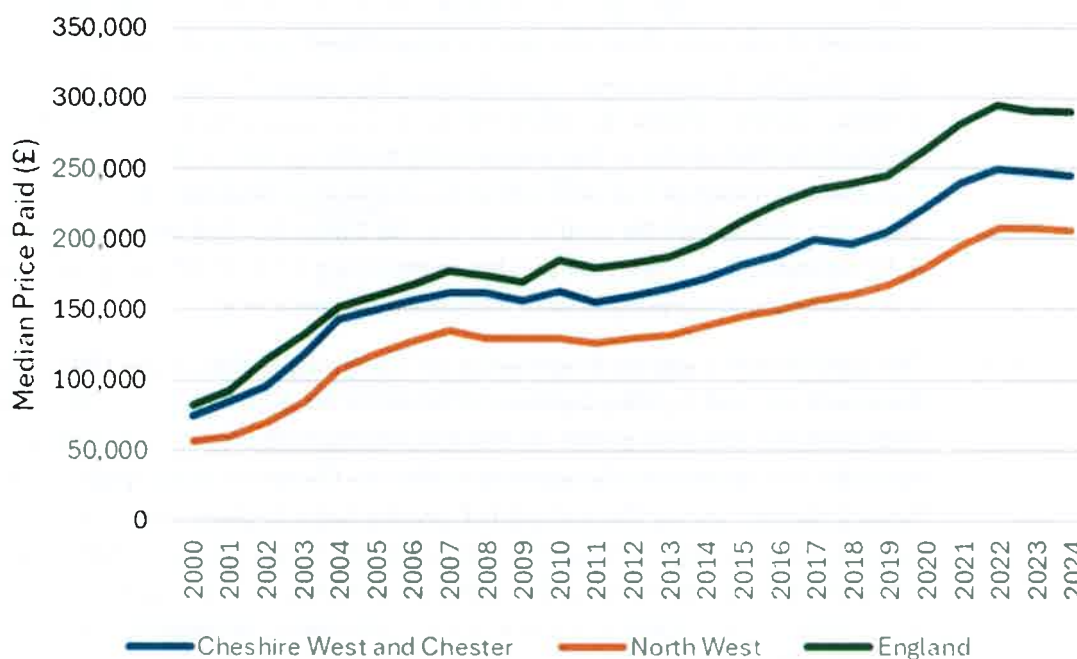
- 1.5 Both sites are located within wider land parcels identified in the LPIO as potential growth areas on the edge of Chester in refs. CH01 and CH02. Satnam and Hillmarch support the identification of its land interests to support the very high level of residential growth required and welcomes the opportunity to provide comments to inform the preparation of the Council's emerging Local Plan. The owners respectfully requests that its comments are taken into account during the development of the LPIO consultation and that its land interests are taken forward as proposed residential allocations in the emerging Local Plan.
- 1.6 This note has been structured to provide an overview of the Council's housing need and supply position, before providing our analysis and commentary on relevant approach set out to the future policies in the emerging Local Plan.

2. Housing Needs

- 2.1 The introduction of a new standard methodology (SM3) by the Government in December 2024 has significantly increased CWaC's local housing need (LHN) from 532 dwellings per annum (dpa) (calculated using SM2) to 1,928 dpa, an increase of +262%. CWaC's current LHN is also significantly higher (+43%) than the Council's currently adopted housing requirement of 1,100 dpa in its Part One Local Plan (LPP1).

- 2.2 The National Planning Policy Framework (NPPF) (published in December 2024 and amended in February 2025) sets out the Government's policy in respect of housing and other matters. It states that, to determine the minimum number of homes needed, strategic policies should be informed by a LHN assessment, conducted using the standard method set out in national planning practice guidance (PPG). In this regard, it is important to recognise that SM3 sets only the minimum housing requirement. The NPPF goes on to outline that 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.
- 2.3 The possible policy approach outlined at SS 1 (Housing Needs) of the LPIO consultation document sets out a policy approach of planning for a minimum of 1,914 new homes each year over the plan period. As this is a minimum housing requirement and can be exceeded, we would strongly recommend that the Council proactively plans to maximise housing delivery across the plan period, putting steps in place now to ensure plan-led development to best achieve the objective of supporting a vibrant, diverse and competitive local economy with sufficient flexibility in the supply to respond to unforeseen circumstances and guard against speculative development in unsustainable locations. This will also help to maximise the longevity of the Council's emerging Local Plan by reducing the likelihood of CWaC's housing requirement needing to be reviewed within five years of the Plan's adoption.
- 2.4 Indeed, since the publication of the LPIO consultation document the SM3 figure has already increased to 1,928 dpa having regard to the latest stock and affordability data. This still represents the minimum amount of housing development that should be planned for, but it is likely to continue to increase incrementally over time as housing prices increase due to constrained supply, and wage growth fails to reflect that localised house price inflation. This points to a need to plan for a higher requirement, even without uplifts for other factors such as economic growth and strategic needs.
- 2.5 CWaC has not escaped the national housing crisis, with rising house prices worsening the Borough's historic affordability pressures. This in turn makes it increasingly difficult for younger residents to remain in the Borough, pricing out the economically active future generations to other areas that offer a wider range of more affordable housing options. For example, house prices have grown by over 225% since 2000 in CWaC, with median average house prices at £245,000 as of December 2024. This is c.19% higher than the regional average of £206,000.

Figure 2 Median House Price Paid in CWaC and comparator areas (2000-2024)



Source: ONS (2025)

2.6 This house price growth has resulted in the Borough becoming increasingly unaffordable. This is evident in the Borough’s ratio of median house price to median gross annual workplace-based earnings, which averaged 7.35 in the 5-year period 2019-2024. House prices are now 7.35 times the annual average wages in CWaC, well above the regional level.

Table 1 Housing Affordability in CWaC and comparator areas

| | House Price (year ending September 2024) | Income (2024) | 5 year Affordability Ratio Average |
|---------------------------|--|---------------|------------------------------------|
| Cheshire West and Chester | £245,000 | £36,851 | 7.35 |
| North West | £206,000 | £35,170 | 6.28 |
| England | £289,995 | £37,630 | 8.32 |

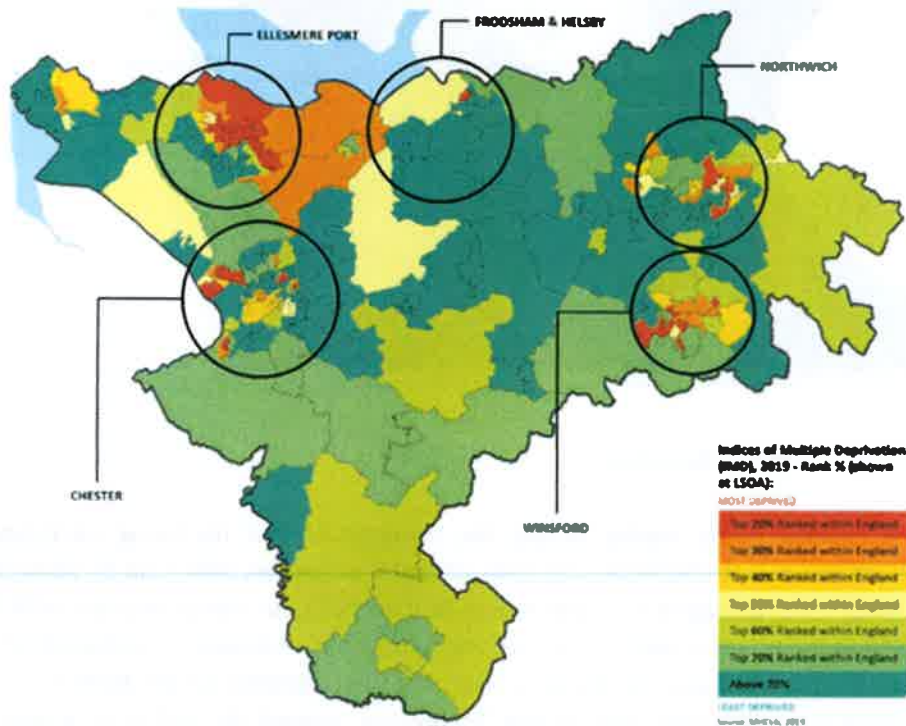
Source: ONS (2025): House price to workplace-based earnings ratio

2.7 The English Indices of Deprivation (IMD) 2019 provides an indication of levels of deprivation based on a range of indicators, including income, employment, health, education, barriers to housing & services and crime. Whilst overall CWaC is marginally less deprived than England as a whole, there are pockets of very high deprivation that are concentrated within the urban settlements of Chester, Ellesmere Port, Northwich and Winsford. 69 of the 212 Lower Super Output Areas that make up the Borough are within the 30% more deprived nationally regarding access to housing and services. Therefore, barriers impacting the physical and financial accessibility of housing and local

services across CWaC are contributing to the levels of deprivation that are evident. This is reflected in the fact that there were 6,656 households on the Council's housing register waiting list in 2024.¹

- 2.8 The Satnam and Hillmarch land interests are located in close proximity (as the crow flies) to deprived parts of Chester city, particularly Daleside Nursery which is situated to the north-east of Blacon (parts of which are within the top 10% most deprived nationally). Boosting housing delivery in these locations would play a beneficial role in reversing the trends, by enhancing quality of life and boosting economic productivity.

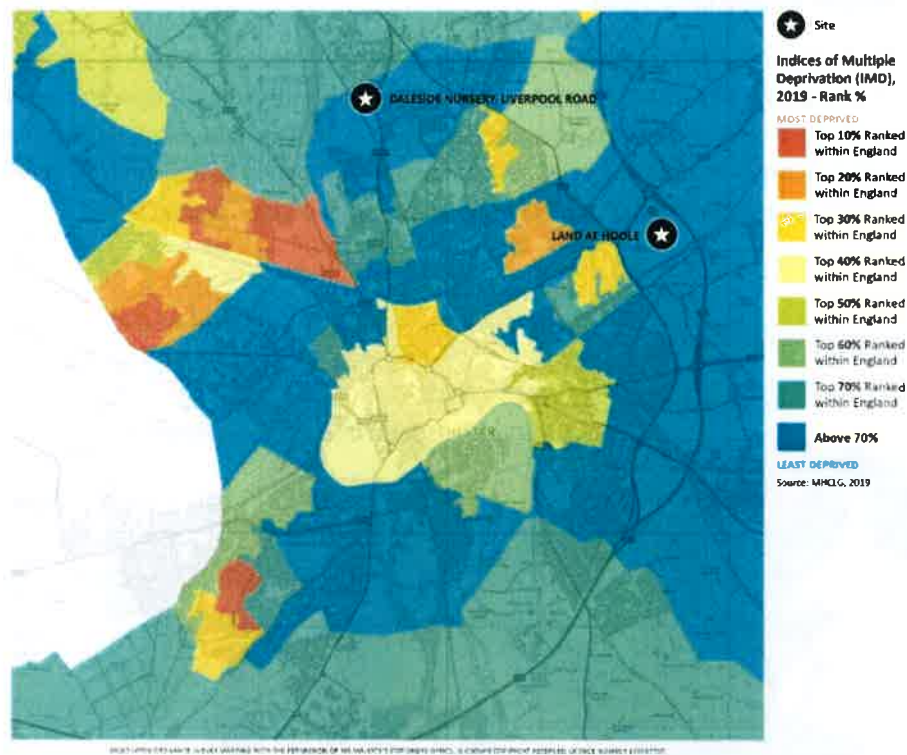
Figure 3 Deprivation levels in CWaC



Source: MHCLG (2019): Indices of Multiple Deprivation

¹ ONS (2025): Table 600: number of households on local authority housing registers (waiting lists), by district.

Figure 4 Deprivation levels in Chester in relation to Satnam's two land interests.



Source: MHCLG (2019): Indices of Multiple Deprivation

- 2.9 The private rental market across the Borough is also becoming increasingly less affordable due to the increasing costs of rental properties driven up by rising demand. Private rents averaged £926 per month in June 2025, an annual increase of 9.3% from £848 in the previous year.² This is pricing people out of private-rented accommodation. The Borough is currently failing to meet the requirements of the NPPF to ensure an appropriate size, type and tenure of housing needed for different groups in the community is available, including people who rent their homes. Increasing the supply of a wide range of housing, including affordable properties, is critical to help meet this demand.
- 2.10 A key focus of both the Council's current and emerging development plan is to provide opportunities for economic growth and investment, with an emphasis on delivering a range of job opportunities to support sustainable communities. Strong levels of housing delivery are key to a properly functioning, sustainable economy. For example, providing a wide choice of housing, particularly affordable dwellings, will allow the Borough's younger residents to access and move up the housing ladder, enabling them to live and work in CWaC. Additionally, a diversified housing market will attract more skilled workers to live in Chester, promoting sustainable commuting patterns and strengthening CWaC's labour pool. This in turn will help to increase inward investment to the Borough, raising CWaC's profile as a sought-after place to live and bringing with it new job opportunities, particularly within the construction and housebuilding sectors.

² ONS (2025): Price Index of Private Rents.

- 2.11 There is therefore a very strong and fully justified case to be made that CWaC's housing requirement should meet and, in all probability, exceed its current SM3 figure in order to best achieve the area's growth ambitions in accordance with the NPPF. CWaC should be seeking to maximise residential development in the most sustainable locations such as Chester City, across a wide range of tenures in its emerging Local Plan, particularly affordable properties, to reverse the Borough's affordability pressures and improve accessibility to high quality housing. This in turn will help to create inclusive, diverse communities that promote social wellbeing and increased economic productivity.

Given Chester's role as the only identified Tier 1 settlement in the Borough, housing growth around Chester can serve as the catalyst to promoting the wider sustainable economic and social growth of the Borough. CWaC's approach should be pragmatic and attribute a high proportion of new residential development in and around Chester and other key settlements, as reflective of their size and status. Allocating these two sites in Chester would go a long way towards meeting this objective.

- 2.12 As an aside, a stepped housing requirement is not considered appropriate in this instance given the significant scale of housing delivery required across the Borough and the immediacy of CWaC's need. The Council should be seeking to maximise housing delivery from the very start of the plan period, particularly by identifying housing sites such as these, that are capable of coming forward in the short term.

3. Housing Supply

- 3.1 Paragraph 78 of the NPPF requires local planning authorities (LPAs) to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement. In a report presented to Cabinet in January 2025, CWaC confirmed that applying the Council's increased LHN figure (to reflect SM3) would mean that it was now unable to demonstrate a five year housing land supply (5YHLS).
- 3.2 The Council's most recently published deliverable supply position is set out in its *Housing Land Monitor Summary Report 2025*. This document argues that, as of 1st April 2025, the Council has a total deliverable supply of 3,788 dwellings. CWaC claims to be able to demonstrate **1.89 years' supply** based on an annual housing requirement of 1,912 dpa with a 5% buffer. When accounting for this slightly increased figure in the calculation (in accordance with paragraph 78 of the NPPF), this would reduce the supply to just 1.87 years at best, even before any analysis is undertaken of the site-specific components. To date we understand that the Council's claimed supply has not been contested, but it acknowledges the significant shortfall in its deliverable five-year housing land supply and the implications it has for the emerging Local Plan.

Table 2 CWaC's 5YHLS position (base date 1st April 2025)

| | 2025 – 2030 (base date 1 st April 2025) | |
|--|--|---------------------------|
| | Council's Claimed Position | Satnam's Claimed Position |
| Annual Housing Requirement (r) (SM3) | 1,912 | 1,928 |
| Five Year Housing Requirement (5r) | 9,560 | 9,640 |
| Five Year Housing requirement with 5% buffer | 10,038 | 10,122 |
| Council's Claimed Housing Supply | 3,788 | 3,788 |
| 5YHLS position | 1.89 years | 1.87 years |

Source: Council's Housing Monitor Summary Report 2025

- 3.3 The effect of the assessment (summarised in Table 2) is that the Council must identify an additional 6,334 dwellings against a 5-year housing requirement of 10,122 dwellings when applying the relevant buffer. This is a significant number of houses that the Council must identify to mitigate the ability for speculative residential applications to come forward on the basis of a lack of 5YHLS. This shortfall will only increase if the Council takes our advice and plans for a housing requirement that exceeds its LHN.
- 3.4 It is therefore essential that the Council allocates a wide range of sites, including both smaller sites as well as larger, more strategic, housing allocations that have high prospects of coming forward within a five year period. This will need to avoid backloading supply in the later years of the plan period. Smaller sites are less likely to have significant technical or physical constraints to impact delivery and are typically more capable of being brought forward in the early part of the plan period to address identified needs in the shorter term.
- 3.5 These 2 land interests on the edge of Chester are available, achievable and deliverable and should therefore be allocated for residential development to come forward in the early part of the plan period. The sites will make a strong contribution to CWaC's 5YHLS, accounting for the Council's significantly higher housing requirement.
- 3.6 Furthermore, we have concerns that the total housing capacity of sites identified in the Council's Land Availability Assessment (LAA) (Stage One) (April 2025) could fail to meet CWaC's overall housing requirement for the plan period. The LAA estimates a total capacity of 28,924 dwellings, which is only slightly above the Council's total minimum housing requirement of 28,710 homes based on SM3. The Council has failed to incorporate a suitable buffer in its supply should the identified sites not come forward at the rate they expect or fail to come forward at all. The lack of any kind of meaningful buffer to the figures means that the Council's current supply figure will not meet or exceed its housing requirement, which is likely to put additional strain on the Council to allocate a considerable number of housing sites as part of a future Local Plan Review.

- 3.7 To mitigate this, the Council should build in sufficient flexibility to its supply to ensure needs are met in full (as a very minimum). We would recommend that the Council takes a more proactive approach and seek to exceed its LHN. The Council should therefore review its housing land supply in this context.
- 3.8 Whilst we welcome the consideration of both these land interests in the Council's LAA under references 1930 (Land at The Dale, west of Liverpool Road, south of Percival Close, Upton, Chester) and 1416 (Land off Warrington Road (A56), Hoole, Chester), it has concerns regarding the methodology used to assess the Borough's land availability. The Council's methodology, which removes sites containing more than 10% of land located in the Green Belt from further assessment in Stage One of the LAA, is clearly flawed. The LAA states that sites may be revisited as a result of the review stage of the LAA, or as part of the plan making process. Regardless of whether sites are located in the Green Belt or not, they should not be discounted at this stage. Instead, they should be taken forward for further consideration on the basis that allocating the most sustainable, least constrained Green Belt sites will be required to ensure the emerging Local Plan has the greatest prospect of being found sound at Examination. It is critical that sites around the edges of Chester in particular (to include refs. 1930 and 1416) are considered further through the emerging Local Plan, by taking them forward into Stage Two of the Assessment. This will allow the Council to identify the most sustainable sites around Chester, a top-tier settlement already heavily constrained by Green Belt, for a residential allocation through the emerging plan.

4. The Council's Proposed Vision

- 4.1 CWaC set out its proposed vision in VI 1 of the LPIO consultation document (it is assumed that this is not proposed to form a Policy in the future). It sets out the vision for CWaC in order for it to be a desirable and attractive place to live, work, learn and visit. The vision is made up of four overarching principles, one of which is to ensure the provision of appropriate infrastructure in suitable locations to make CWaC a good place to live. Whilst it appears that 'appropriate infrastructure' is intended to include the provision of housing, the vision does not currently make specific reference to the need to deliver new homes. This is concerning given the scale of housing growth CWaC should be planning for going forward, which is vital for promoting economic growth and development across the Borough.
- 4.2 The provision of new, high quality, housing to include a range of types, sizes and tenures is paramount to ensuring the Borough remains a desirable and attractive place to live. **We are of the view that the four principles should be expanded to include a further principle that focuses solely on the provision of new housing**, so that the right homes are delivered in the right places at the scale required to meet identified needs.
- 4.3 We also support the creation of specific visions for the larger settlements, particularly Chester, where a large concentration of the Borough's overall housing requirement should be focused towards. This should include the Satnam and Hillmarch land interests.

5. SS 3 – Spatial Strategy principles

- 5.1 The possible policy approach outlined at SS 3 (Spatial Strategy Principles) focuses on directing new development and allocating land towards previously-developed sites within settlements first, before developing on the edge of existing settlements in locations with best access to public transport and existing services and infrastructure. The Policy states that depending on the settlement this may require the release of Green Belt land.
- 5.2 We support the broad principles of CWaC's spatial strategy, given its alignment with national planning policy's brownfield first approach. However, an overreliance on brownfield land to deliver new housing is a risky strategy given the increased likelihood of technical and viability constraints delaying residential development coming forward on such sites.
- 5.3 Given the scale of housing growth required across the Borough, allocating deliverable and unconstrained housing sites in and around Chester will be fundamental due to the City's scale and sustainability. However, the supply of brownfield sites within Chester is limited; the settlement edges are heavily constrained by the Green Belt; and other constraints largely within the city centre (including heritage and flood risk) are apparent, therefore extensions to the current urban area will be required. This will therefore involve revisions to Chester's existing Green Belt boundaries.

6. SS 4 – Settlement Hierarchy

- 6.1 The possible policy approach outlined at SS 4 (Settlement Hierarchy) states that the emerging Local Plan will set out a settlement hierarchy, based on their status and role in providing local infrastructure and services for their relatively larger populations and the surrounding hinterland.
- 6.2 Chester, the only City in the Borough, is rightly at the top of the settlement hierarchy, due to its scale and the wide range of services and infrastructure it has to offer its large population.
- 6.3 We support the Council's settlement hierarchy and ask that the Council allocate sustainable sites for housing on the edge of Chester's existing settlement boundary, particularly to the north and east of the city to include Satnam's land interests. Housing growth should be prioritised in and around Chester to maximise its potential as a sub-regional settlement.

7. SS 5 – Spatial Strategy Options

- 7.1 The possible policy approach outlined at SS 5 (Spatial Strategy Options) sets out three growth options for where development could be located across the Borough:
 - Option A – Retain the Green Belt
 - Option B – Follow current Local Plan level and distribution of development
 - Option C – Sustainable transport corridors

The policy states that all options could accommodate at least 29,000 new homes, albeit with a different distribution of sites and settlements depending on the Option. These are discussed below.

No Green Belt Release (Option A)

Option A proposes to retain the existing Green Belt by allocating brownfield sites within existing settlement boundaries; increasing densities; and proposing growth in areas not located in the Green Belt. This option proposes major development in and to the south of Northwich (just over 5,000 homes); significant urban extensions to the south/west of Winsford (more than 11,000 homes); growth in non Green Belt Key Service Centre villages such as Tarporley, Tattenhall, Malpas and Farndon; and more limited development to the south/east of Tarvin, Kelsall and Cuddington and Sandiway.

- 7.2 This option is reliant on the significant expansion of existing settlements outside of the Green Belt to meet the Council's identified housing needs. It fails to identify any potential housing growth areas in the most sustainable settlements higher up on the Council's settlement hierarchy, particularly the City of Chester and Ellesmere Port, a main town. Satnam has very serious concerns that this option will create considerable infrastructure pressures on a small number of settlements, particularly Northwich and Winsford, alongside a handful of villages where existing facilities and services are relatively limited. The option is likely to result in less sustainable sites coming forward within the existing settlement limits to avoid releasing land within the Green Belt, but on the edge of much more sustainable settlements in the Borough, most notably Chester.
- 7.3 The possible policy approach outlined at SS 5 references the findings of the Inspector's Report into the LPP1 to seek to justify the retention of Green Belt land around the edges of Chester. **The significant increase in the Council's housing requirement since the Examination of LPP1 in 2014 has materially changed the context in which the Inspector's findings were made.** These findings, which are now out-of-date, can no longer provide the necessary justification for preventing Green Belt release around Chester.
- 7.4 The scale of growth required to meet the Borough's housing needs is so substantial that it is considered unrealistic that it can be accommodated within the Borough without any Green Belt release. The NPPF states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified [§145]. Exceptional circumstances include where an authority cannot meet its identified need for homes [§146]. If this is the case, the NPPF sets out a sequential approach to the release of Green Belt land, giving priority to previously developed land, then grey belt land which is not previously developed, and then other Green Belt locations [§148].
- 7.5 We strongly consider that Option A, proposing no Green Belt release, will prevent the Council from meeting its housing needs in full. This is an unsound strategy. In accordance with the NPPF, exceptional circumstances therefore exist to allow the Council to review and amend its Green Belt boundaries through the Local Plan process.
- 7.6 Additionally, not only should CWaC be seeking to maximise development in the emerging plan period, paragraph 145 of the NPPF requires any Green Belt boundaries to be amended so they can endure beyond this period. In accordance with national policy, CWaC must safeguard land for development that is capable of coming forward for housing beyond the plan cycle. Whilst the spatial strategy options claim to be able to

accommodate a minimum of 29,000 homes, CWaC has failed to account for the development needs of the Borough beyond this plan period. CWaC should not only be accounting for needs within the emerging plan period, but also beyond the plan period to ensure Green Belt boundaries endure.

- 7.7 We respectfully ask that the Council does not pursue this option further and instead takes a more proactive approach to meeting needs now, in and around the most sustainable settlements in the Borough. This will avoid a position where the Council cannot demonstrate a 5YHLS going forward and reduce the risk of planning by appeal as speculative housing applications continue to come forward in the short term. It will also help to mitigate the need for the Council to release further land (particularly land within the Green Belt) in future local plan cycles.

44. Green Belt Release (Options B and C)

Both Option B (*Follow current Local Plan level and distribution of development*) and Option C (*Sustainable transport corridors*) propose to release Green Belt land.

- 7.8 Option B aims to locate most new development in or on the edge of the main urban areas, with an appropriate level of new development focused on the smaller settlements which have adequate services and facilities and access to public transport. This includes large urban extensions around Chester, Ellesmere Port, Northwich and Winsford; the release of Green Belt to deliver 11,000 homes; relatively limited development in smaller settlements to deliver 3,000 homes; and the delivery of 2,500 homes across the rest of the rural area.
- 7.9 Option C proposes new homes focused in and around settlements on the railway network and on main bus route corridors. This option is expected to require Green Belt release to deliver 12,000 homes, but results in a more widely distributed pattern of development that would result in more modest urban extensions around Chester; Ellesmere Port; Northwich; and Winsford than Option B. Smaller settlements with a rail station, such as Cuddington and Sandiway; Helsby; Frodsham; and Neston and Parkgate, would have a greater role in accommodating development under this option. It is noted that this option includes the potential for further development in the rural area and in places along bus corridors including: Farndon; Malpas; Tarporley; Tarvin; and Tattenhall.
- 7.10 Both options propose the urban expansion of Chester, which we fully supports. This is reflective of Chester's identification as the top tier settlement in the possible policy approach outlined at SS 4 (Settlement hierarchy) due to its status, scale and role in providing local infrastructure and services for its residents. We consider that housing growth should be concentrated in sustainable locations in and around the settlement boundary of Chester rather than directing development to smaller settlements that will more likely require significant infrastructure investment to support this scale of growth.
- 7.11 Table B.1 sets out the four potential growth areas identified around Chester, three of which are identified solely for housing and one for mixed-use development, specifically:
- CH01: Chester North – Upton Triangle (Mixed-use);
 - CH02: Chester East – Piper's Ash (Housing);
 - CH03: Chester South – Wrexham Road (Housing); and,
 - CH04: Chester North – North of Blacon (Housing).

- 7.12 Both land interests are identified as possible growth areas for residential development within Options B and C, with Daleside Nursery located in CH01 and Land at Hoole located in CH02. Going forward, we consider that CWaC should progress with a strategy (either of the two options or a combination of both) that involves the release of Green Belt land, particularly on the northern and eastern edges of Chester.
- 7.13 Both sites are well placed adjacent to the strategic highway network, specifically the A5116 Liverpool Road and the A56 Warrington Road, that offer a number of bus stops adjacent to the sites. The stops provide services into Chester city centre. A wide range of local services and facilities within the suburbs of Upton-by-Chester and Hoole are within walking distance. The sites are sustainable ones capable of meeting the development needs of the Borough.

8. CH 1 – Chester

- 8.1 CWaC proposes to include a place-based Local Plan Policy for Chester which combines LPP1 Policy STRAT 3 with LPP2 Policy CH 1 as the City's overarching policy. The suggested policy approach set out in the LPIO consultation document (confusingly also named CH 1 (Chester)) seeks to promote opportunities for sustainable travel; increase opportunities for people to live in the heart of the city through the right mix of housing and creating high quality places; supporting a vibrant city centre; and providing quality office space.
- 8.2 It goes onto state that the emerging Local Plan will set out the level and location of new development with protection of the historic environment and special character of the City remaining the priority.
- 8.3 We broadly support the suggested approach of CH 1, particularly the need to provide the right mix of housing and create high quality places. Chester, being the sole top tier settlement in the Borough should accommodate a significant proportion of development relative to its size and function. However, the wording implies a need to focus residential development towards the City Centre, where available and deliverable urban sites are more limited and will likely take much longer to come forward, if at all. Given the need to protect the City's historic environment, which is recognised in CH 1, and the urgency of the housing crisis facing the Borough, the wording should be amended to reference the importance of sites on the edge of Chester's settlement limits to facilitate residential development, where heritage and viability constraints are less likely to be a material consideration.
- 8.4 As mentioned above, Chester's settlement limits should be reviewed in light of the need to meet and exceed the Council's housing requirement informed by SM3. Sites in and around Chester should be a focus for housing development, given these locations can accommodate the scale of growth without straining existing infrastructure provision and services.

9. HO 1 – Mix and type of housing in new developments and specialist housing

- 9.1 The possible policy approach outlined at HO 1 (*Mix and type of housing in new developments and specialist housing*) sets out that the new policy approach will provide detailed policy requirements around housing mix and type, including the percentage of different sized dwellings including by tenures; the percentage of plots for self-build and custom housebuilding; requirements to meet the needs of an ageing population and meeting the needs of residents with disabilities.

- 9.2 Although these percentages are yet to be defined, we understand that they will be informed by the findings and recommendations of a Housing Needs Assessment (HNA) to be prepared in due course. The HNA should not only consider the mix and housing type requirements at a Borough- wide level but should also consider the requirements of smaller sub-areas to inform the approach to be taken at a more local level.
- 9.3 We support the suggested policy approach as long as the policy requirements are fully evidenced and justified. We ask that CWaC does not apply the policy requirements rigidly to every new housing site across the Borough. Instead, there should be a degree of flexibility in the application of the Policy which should be applied on a site-by-site basis to account for market factors, viability, constraints and locational requirements. This is in recognition of the fact that a different housing mix may be more appropriate in a specific location e.g. 1- and 2-bedroom dwellings may be more suited to Chester City centre whereas larger 3- and 4-bedroom properties may be more suitable in edge-of-settlement locations.
- 9.4 We request that the wording of the policy accounts for a suitable level of flexibility in the percentage mix and tenure requirements. This will ensure that residential proposals on sites address the housing requirements of the local area specifically, rather than a 'one size fits all' borough-wide requirement.

10. HO 2 – Delivering Affordable Housing

- 10.1. The possible policy approach outlined at HO 2 (*Delivering Affordable Housing*) sets out the suggested policy approach of setting the percentage of affordable housing required on 10 dwellings or more (unless in designated rural areas) across the borough including potentially by sub-area. The approach intends to reflect the Government's requirement for housing sites in the Green Belt to provide at least 50% affordable housing.
- 10.2 We support the proposed size threshold for delivering affordable dwellings on residential schemes and generally supports the potential for different sub-areas to have different affordable housing requirements. However, these requirements have not yet been identified. We request that the requirements are fully evidenced and justified to ensure that residential schemes help to address identified affordable needs both locally and borough-wide.
- 10.3 We recognise that the provision of at least 50% affordable housing on housing sites in the Green Belt reflects paragraph 67 of the NPPF. The development of their land interests for housing will therefore seek to deliver the 'Golden Rules' in the NPPF. However, the NPPF provides a degree of flexibility on the delivery of at least 50% should this make the development unviable (when tested in accordance with national planning practice guidance on viability). HO 2 should therefore incorporate suitable wording around viability to reflect the NPPF, to ensure that the delivery of residential schemes is not hindered due to viability constraints. Furthermore, the Policy should be supported by a viability appraisal that tests the level of affordable housing provision proposed under HO 2.

11. GB1-GB7, Green Belt and Countryside.

- 11.1 Clearly the green belt must be reappraised as part of this local plan process to reflect national policy (grey belt) and current development requirements. Once this appraisal is undertaken, the remaining green belt and countryside areas require adequate and appropriate policy protection. These policies must follow recent advice set out in NPPF.
- 11.2 A clear policy for grey belt circumstances must be set out, including clear and easily followed guidance.

12. TA1-TA8, Transport and Accessibility.

- 12.1 The transport policy is broadly acceptable, but sufficient flexibility should be included to ensure a range of sites in various location across the local plan area can come forward in as sustainable manner as possible.
- 12.2 Proposals for the A56/M53 park and ride should be clearly defined and funding set in place.

13. ID1-ID6, Infrastructure and Developer Contributions.

- 13.1 A clear policy on developer contributions and infrastructure delivery is required in the local plan. This needs to be sufficiently flexible to take account of changing market values and needs, together with the changes expected in the need for various forms of infrastructure over the length of the plan period. National policy should dictate the burden placed on development to provide infrastructure, always of course with the backdrop of viability testing if necessary.
- 13.2 Policies for the delivery of infrastructure via developer contributions or publicly funded should not hamper or curtail the delivery of the growth agenda in short to medium terms.

14. Summary

- 14.1 Overall, Satnam and Hillmarch are supportive of CWaC's plan-making process to date, particularly through the identification of its land interests to support high level residential growth within the Borough. We welcome the opportunity to provide comments to the Council's possible policy approach to be adopted in due course in the emerging Local Plan and will continue to engage through future consultations.
- 14.2 These representations have highlighted the importance of CWaC taking a pragmatic approach to plan making and seeking to exceed the Council's identified LHN informed by SM3. Promoting economic growth and investment across the Borough is a key objective of the Council's adopted and emerging development plan. Key to achieving this is reversing the symptoms of the Borough's housing crisis. The Council must take advantage of the current opportunity to plan for the scale of housing growth required to reverse the Borough's existing housing pressures. This will enable CWaC to make a more meaningful contribution to meeting the Government's target of delivering 1.5 million new homes by 2029.

- 14.3 The scale of housing growth required across the plan period, to deliver 1,928 dpa (at the very least), is so significant that pursuing a spatial strategy that proposes no Green Belt release (Option A) is simply not feasible or desirable and will not meet the soundness tests set out in the NPPF. Option A is reliant on the expansion of smaller settlements, which are lower down CWaC's settlement hierarchy, including a number of non-Green Belt villages where facilities and services are more limited. Residential development should focus in and around the larger, more sustainable settlements of the Borough such as Chester and Ellesmere Port.
- 14.4 Amending the Council's existing Green Belt boundaries, particularly around the edge of Chester to incorporate the Satnam and Hillmarch land interests, is considered justified to deliver sustainable housing growth. Chester, the only Tier 1 settlement in CWaC, should accommodate a proportionate level of housing growth around its limits to sustain and develop its role as a sub-regional settlement. As set out it is imperative that the Council also consider needs beyond the plan period and release sufficient land at this time so that there is at the very least a reasonable prospect that the green belt boundaries established through this review will endure beyond the end of the plan period (a requirement of paragraph 145 of the NPPF).
- 14.4 The Council should therefore pursue a spatial strategy based on either following the current Local Plan level and distribution of development (Option B) or directing development towards sustainable transport corridors (Option C), or a combination of the two, to include the allocation of land at Hoole and Daleside Nurseries. We fully welcome and support the potential strategy of allocating these land interests within growth areas CH01 and CH02.
- 14.5 Both Satnam's land interests are located on the edge of Chester and are available, achievable and deliverable. The allocation of both sites for housing will enable residential development to come forward in the short term following the adoption of the Local Plan. The strategy of allocating such sites, that are capable of being delivered in the early part of the plan period, will help to mitigate the Council's currently poor housing land supply position. This will increase the longevity of the emerging Local Plan by meeting housing needs in full from the outset.
- 14.6 Satnam and Hillmarch would welcome an opportunity to meet with policy officers at CWaC at the earliest opportunity to discuss these comments in detail and assist the Council in delivering a robust and sound Local Plan that meets the needs of its existing and future residents.