

Planning Policy

Cheshire West and Chester Council
The Portal
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By email to: planningpolicy@cheshirewestandchester.gov.uk

Date: 28 August 2025

Our Ref: 22-029-ltr-001

Re: Formal response to the Cheshire West and Chester Local Plan Issues and Options (Regulation 18) Consultation on behalf of Mr and Mrs Hall.

To whom it may concern

I write on behalf of my clients, Mr and Mrs Hall, in response to the formal consultation on the issue and options (I&O) relating to the emerging replacement Local Plan for Cheshire West and Chester.

My clients are the owners of a parcel of land to the southern end of West Road, Weaverham, which comprises of land between the settlement edge and the A49 Weaverham Bypass – an extract from the land registry showing their ownership is appended for your information. We note that the LPA have already identified this as a possible site for housing and employment uses (it is the southern portion of site 2065) but can confirm that my clients will be promoting this site further for a mixture of residential uses during the local plan process.

With regard to paragraph 1.29 of the I&O document we have made a representation to your call for sites given that the site may not be associated with an active owner or promoter within your records. Should the LPA have any specific questions or queries about our client's land holding, or the site's availability, achievability or deliverability, we'd be delighted to speak to officers. The client intends to make a more substantial and formal submission to the LPA as part of a second part of your Land Availability Assessment (Stage 2) or future stages of the formal Local Plan consultation which we anticipate will occur following this Issues and Options consultation. This will provide additional information to the authority in respect of the site's technical constraints whilst providing a wider vision for how the site may come forward.

In preparing this response we are mindful of the specific set questions that form part of the Issues and Options consultation paper. Our response has been prepared based on these questions, however, there is considerable overlap between the matters covered. Where relevant, reference is also made to our clients' land holding and the contribution it may make to delivering / achieving the matters raised. The policy topics that are considered relevant to our clients land holding are set out below in the order in which they appear in the documentation.



General comments on the I&O approach

As a general comment we would highlight that the preparation of a new Local Plan provides an opportunity to create a vision-led plan for Cheshire West and Chester which can fully maximise the opportunities provided by the current and future planning system. The current system has changed significantly since the extant local plan was adopted in January 2015, in part due to a greater recognition of the impacts of climate change (which your plan clearly identifies), but also due to the increasing issues surrounding housing delivery and supply. The new plan should embrace these changes and challenges within its emerging planning policy.

On behalf of our client, we acknowledge that it is important that the plan continues to be 'positively prepared'. Within its ongoing work post-consultation we anticipate that the Council will begin to explore the types and nature of development that is (or is likely to) coming forward, including relevant opportunities and drawbacks, to help influence and inform the nature of the plan and its context. Our client would encourage the Council to consider a pro-development approach to the emerging local plan, coupled with a recognition that small and medium sites can make a real contribution to meeting growth aspirations, often in a more sustainable manner than larger allocations.

The approach, vision and objectives

Question IN1 – Required evidence

Having considered the evidence that the LPA seeks to collate in order to support the decisions on the emerging Local Plan (listed under paragraph 1.19 of the document) it seems that the breadth of evidence is appropriate. It is assumed that the second stage of the land availability assessment may seek to consider sites in a much more robust manner than a typical SHLAA or SHMA and would sensibly include an assessment based on the design, landscape and character impact of any sites. It would not be considered appropriate for the evidence to conflate these important matters with the Green Belt and the assessment that would be undertaken for that study.

There is also likely to be a number of available sites which have a significant townscape or visual impact, however, the evidence base currently lacks the requisite depth which would enable such matters to be appropriately considered. In this respect we note that there is reference to the Cheshire West and Chester heritage strategy which does not appear in the list of 1.19 and should form part of any holistic assessment of potential allocations. Looking forward, many of the questions posed relate to the provision and capacity of local services and local character (assuming this is townscape / landscape). In that respect it is recommended that additional work looking at the attributes of all settlements is undertaken to help underpin decision making.

Question IN3 – Plan period

Whilst the most common plan period for Local Plans, once a 15 year plan is adopted there is often a 4 – 6 year period of the plan which is already past, and much of the early period of the plan is focused (necessarily) on bringing newly allocated sites online. As a result, the strategic, forward-looking nature of the plan becomes slightly truncated and it results in limited use of a plan for strategic purposes. We agree that it would be sensible to have a vision that looks towards the next 30 years but suggest that the plan covers a 20-year period (and includes allocations to meet the demand as such). Whilst aware of other arguments which would suggest this approach would lack flexibility and the ability to modify the plan to meet short and medium terms goals, given the current guidance and emerging national legislation on regular plan review this does not appear to be something that would unduly constrain future plan making, and may in fact reduce the resource burden of future plan reviews.

Question IN6 - Neighbourhood Plans

Both our client and we are supportive of the role that neighbourhood planning can play in the planning process. We have indeed been involved in helping several local Parish Councils prepare their plans - including Cuddington and Moulton – but recognise that responsibility for allocating sites to meet strategic need at this level is something that is not always appropriate. However, we are very supportive of neighbourhood planning having a role within the design and landscape approach to sites which are to be allocated, but the LPA must ensure that they have sufficient resources to provide any additional guidance to allow for a consistent approach across all neighbourhood plans which are prepared under the new local plan.

Question VI2 – Vision (principles)

Whilst there is nothing that our client would wish to see omitted from the suggested draft vision within the document, they are concerned that it completely omits any reference to the requirement to meet the objectively assessed need for new homes, employment land and other uses. Whilst some of this may come through the suggested smaller ‘visions’ for the key settlements, it is recommended that some reference be made to ensuring that new homes to meet identified need are provided in a sustainable and balanced pattern of growth, seeking to locate them where they can make effective use of existing infrastructure and facilities. Decisions about land should not simply be a result of what land is available, or free of constraints (although both important) but should encourage sustainable, long term patterns of growth – along rail corridors, key highways routes, close to existing shopping and employment areas – as well as exploring the appropriate use of higher densities.

Question VI3 – Vision (Key Places)

We are in complete support of smaller visions for the key places in the Local Plan area. As a small suggestion we note that both the current Local Plan and emerging policies later consider Northwich to include a cluster of satellite settlements – including Weaverham. Perhaps the vision should reflect this in its new title – for example a term like the ‘Northwich cluster’ might be more appropriate. This means that it is clear that development within these satellite settlements are covered by the vision.

Question OB1 and OB2 - Approach to objectives

The client does not consider that either option 1 (Take forward existing objectives) or option B (Use the sustainability appraisal objectives) are appropriate. In this respect, option C is supported. It is considered that a strong opportunity here exists to prepare a series of forward thinking, pro-growth objectives which are based around thinking beyond policy designations and more about sustainable growth patterns. As currently proposed, the current objectives may undermine the plan's ability to think beyond traditional concepts of land use planning. The use of the sustainability appraisal objectives would be counter-productive and would remove an important 'check and balance' between the two documents, which is the primary purpose of the sustainability appraisal. This again would also constrain the visionary and forward-looking elements of the plan.

Question OB4 - Existing objectives

Whilst the client could conceive of a position whereby the existing Local Plan objectives SO1 and SO3 could be amended and adapted, SO9 and SO10 are not considered suitable. This is particularly true of policy SO10, which conflates design and character with Green Belt policy. This approach should be avoided within any future objectives - design and landscape impact should be a separate matter from Green Belt, and in any case would be effectively balanced against new objectives which consider at locational sustainability, such as those identified in SO2 and SO12 of the existing Local Plan objectives.

Question SD1 - Approach to sustainable development

Our client supports the LPA's commitment to addressing climate change through policy, however, the policy as written may be too specific, with many of the policy criteria cross-referencing to matters which are appropriately covered elsewhere in the plan - this is particularly the case with the 'Additional environmental and social requirements'. The policy is a mix of strategic policy and specific policy requirements. The LPA are reminded that the development plan should be read as a whole, and it would seem more appropriate if this policy simply focussed on climate change and climate adaptation.

Question SD2 - District heating

Our client supports the concept of district heat networks (DHN), but notes that these are more appropriate in larger, higher density environments and that there will be a range of localised issues that would determine whether this was the best approach as opposed to other energy efficiency measures. It could be inappropriate for a strategic policy of the emerging Local Plan to be so specific about the requirement for district heating, especially where there is little guidance as to the thresholds for DHN implementation. If the LPA is intent on including such a policy, it seems sensible that this should be a separate policy or built directly into specific larger allocations. It is also unclear why this topic does not feature more within the policy approach outlined under DS2.

The Spatial Strategy

Question SS1 – Planning for new homes

It is acknowledged that the number of new homes required across the plan area is significant, however, this seems appropriate given the proximity of the larger metropolitan centres within the north-west and the good transportation connections within the area. There are also significant affordability issues within all but a few settlements in the local areas. Whilst there are constraints within the Borough there is still a significant proportion of both greenfield and previously developed land which is free from ‘showstopper’ constraints. If we consider the Borough (as a whole) against the items identified in footnote 7 of the NPPF, notwithstanding some constraints there is still land within and surrounding the main urban centres that would be suitable for accommodating new housing growth.

Considering the functional economic market areas (FEMA) which exist within the area (FEMA) alongside the authority’s relationship with surrounding boroughs, there may be further points for consideration. Recent changes to housing figures have affected all the neighbouring authorities – particularly Cheshire East who equally are unable to meet their housing needs with their current plan. Whilst recent plan adoptions in Wirral and Warrington are somewhat immune from these changes (under the transitional arrangements), the fact that their plans still fail to deliver the newly published objectively assessed needs highlights that this demand will still need to be accommodated elsewhere. Given the close relationship between these authorities and the shared FEMA it seems sensible that the Authority speak with neighbours to understand how collectively this can be addressed within both the Chester housing market and the south-Manchester housing market.

As a final point, it may help the plan to be understood more logically if the housing requirement was perhaps rounded up to 2000 from 1914.

Question SS2 – Stepped housing requirement

Our client does not consider that it is appropriate for the Plan to include a stepped housing requirement. The increased housing numbers that were introduced in December 2024 are not currently being delivered in the Borough, with a significant shortfall predicted until perhaps the adoption of this plan in the next three years. In that respect, the authority should focus attention on making sure that sites and allocations can be delivered with all speed from the moment the plan is adopted in order to meet this shortfall and the strategic provision. In order to do so, it is strongly recommended that the Plan allocates a range of different types and sizes of sites – including a strong commitment to smaller sites – which can help bring forward significant numbers in the short and medium term.

Question SS4 - Spatial strategy principles

The principles of the spatial strategy outlined are, in principle, acceptable. It is noted that the final line of the suggested approach indicates that this may require the release of Green Belt and in this respect it is considered that this will be necessary in order to ensure a balanced strategy.

Despite this, our client does not support the use of ‘urban extensions’ as part of any spatial strategy, instead believing that a range of small and medium sized sites are preferable to larger swathes of land release. These sites can be more easily assimilated into a settlement form, the landscape and spread the impacts of traffic and infrastructure.

Furthermore, there are several railway lines that run through the plan area and there are smaller settlements along these routes which could significantly contribute to the housing

need whilst maximising the use of existing infrastructure. Proximity to transport infrastructure (the ability to walk and cycle to a train station or regular bus route) should be a key test within the spatial strategy.

Question SS5 – Settlement hierarchy

In principle there are no issues raised in response to settlement hierarchy. That said, further clarity on the definition of ‘Northwich’ within this context would be helpful. In the currently adopted local plan it includes satellite settlement including Weaverham, where our client’s site is located. We support the continuation of this approach.

If another approach was required, our client could conceive of an alternative approach where settlements like Weaverham, Barnton and Wincham are considered either independently or as a grouping which may include Cuddington, Frodsham and Farndon. However, as the existing local plan identifies, these smaller areas are to all intents and purposes a part of Northwich, often sharing services and facilities. In this respect, on behalf of our client we would recommend that the current approach in the local plan be retained.

Question SS6 – Level of development

In principle it would make sense to allow some growth in most settlements, including smaller ones, to allow for sustainable population growth and to support sustainable communities. Without new homes, smaller settlements may stagnate and services and facilities within them could close - as considered with the Framework. Of course, there may be specific constraints within certain settlements (big and small) that may result in their inability to deliver growth. There is perhaps a proportionally greater role possible for the medium sized settlements / villages within the plan area than some of the larger / key towns and settlements given that there are less constraints, but may still have good access to services and facilities.

This notwithstanding, decisions on the extent of settlement growth should not be made arbitrarily but informed by a finalised and complete evidence base.

Question SS8 – Smaller settlements

The impact of development upon the character of small settlements, and their potential impact on the capacity of services and infrastructure, are important considerations. However, our client believes that each settlement is different and should be treated as such. As a particular example, the principle that development should not exceed the capacity of existing services and infrastructure may be appropriate for some particularly constrained settlements which cannot accommodate additional infrastructure provision, yet unduly restrictive in other instances where new infrastructure delivery is also possible. In any event, any principle which assumes a baseline of ‘no impact’ should be avoided, instead considering how any impacts could be best mitigated.

Question SS9 and SS10 – Green Belt considerations and policies

Yes. Since the adoption of the existing local plan, national policy on green belt has changed significantly, most recently with the introduction of Grey Belt but also through a significant relaxation of previously developed land in these locations. Whilst recent government policy has offered an ability to relax housing supply where plan areas were constrained by Green Belt, this is no longer seen as an acceptable approach. In this context, it would be sensible for the emerging plan to take a much more pragmatic and nuanced approach to Green Belt policy. It may be that green belt policies become more akin to open countryside policies in the way that they function.

Question SS11 and SS12 – Spatial strategy options

Our client considers that a blend of options B and C will be most appropriate spatial strategy for the plan as a whole. Option A would simply result in disproportionate growth in Winsford and in the Middlewich hinterland, as well as pushing development into some of the more rural areas of the plan area. Compared to the current approach, a more dispersed approach of small and medium sized growth across a wider range of areas, including along transport corridors, might yield a more flexible and deliverable strategy.

Option C has the benefit of maximizing the potential of some of the railway stations within the plan area – Acton Bridge being particularly relevant to our client’s site, only 1.5km along the local road network. This seems to be a sensible use of these high capacity transportation assets, many of which have been overlooked for the last 40 years within plan-making due to the presence of the Green Belt.

Question SS20 – Potential ‘showstoppers’

The list of potential ‘showstoppers’ seems sensible and sufficiently detailed to allow for strategic plan making. We note that local green spaces should be treated like ‘Green Belt’ and as such it may not be appropriate to include them in this list. If it is the intention to protect parks, playing fields and other recreational assets currently in use then this may be a useful ‘showstopper’ to consider, but there is also the possibility of requiring replacement(s) within a new allocation.

Question SS21 – Assessing sites for allocation

In addition to the other comments previously made, our client considers the following information to be relevant and this should be taken into account when allocating sites. In broad terms there are five considerations:

1. *Ability to meet the spatial objectives* – insofar as it would contribute to options B or C of the spatial strategy but also thinking carefully about access to services, facilities and a range of transport options.
2. *Ability to provide a wide range of different sizes and locations for development* – avoiding a series of large urban extensions, or a significant number of brownfield sites both of which have the potential for delivery delay.
3. *Ability to be accommodated by existing or new infrastructure* – using the studies of existing settlements and their capacity (additional study required) to ensure that development is located to maximise access to existing community infrastructure.
4. *Ability to be assimilated into the townscape and landscape* – considering the ability of the site to sit within the landscape or the townscape, considering impacts on heritage, key views and local density patterns.
5. *Ability of the site to be delivered* – Key constraints (other than those already screened out) such as vehicle and pedestrian access, key vegetation and trees and any electric, gas or water infrastructure.

Northwich growth options

As noted, our client's site is located on West Road, Weaverham, and as such our more detailed comments specifically address the spatial strategy and broad locations for growth in Northwich. Our client's site sits within potential growth parcel NOR11.

Question SS29 – Potential growth areas

The potential growth options around Northwich appear sensible and considered. It would be very easy for the options to entirely focus on land to the south – outside of the green belt – but sensibly much of this land is well beyond the settlement boundary and disconnected from shops, services and transport options other than the private car. The officers preparing these growth options should be commended for taking a 'policy off' approach. In general, the possible locations for growth are most favourable towards the south and west of the map, offering better connection to the strategic highways network as well as offering access to the railway stations. In addition, other sites appear to be somewhat awkwardly placed against the side of settlements without any form of natural containment. There are other, better sites which are bounded by existing highway and railway infrastructure which lessens the landscape impact.

Question SS30 – Further comments on potential growth areas

On behalf of our client, we have grouped potential growth areas in Northwich (as identified in the I&O document) into three broad categories:

- Sites which are well related to existing boundaries and infrastructure, as well as being close to transport infrastructure (well performing growth areas): NOR04, NOR05, NOR06, NOR07, NOR09, NOR10, NOR11;
- Sites with good access to transport infrastructure, but would form awkward boundaries or enclosure (reasonable growth areas): NOR02, NOR03, NOR06; and
- Sites which are a distance from the transport infrastructure, as well as lacking strong boundaries, and would extend into the landscape (poor growth areas): NOR01, NOR08, NOR12.

We also note that it is important that the possible growth options for Northwich – especially those to the south west along the A556, will need to be considered in relation to those for Cuddington and Sandiway. It is considered important in both Green Belt and spatial planning terms that Hartford and Cuddington do not conjoin. This may mean that sites NOR08 and NOR09 are less favourable.

Northwich spatial policies

Question NO1 – policy approach to Northwich

In principle our client is supportive of the general approach that is suggested for Northwich. We note that we have already given some indication that sites to the west and south of the town may well perform more effectively against the goals of the preferred options. Our client also welcomes the approach that seeks to maintain the countryside gaps and separation between the various satellite settlements and Northwich itself (existing policy GBC3), whilst still accommodating growth in these locations. Support is also encouraged for the safeguarding of the Northwich conservation area in the policy, however, it is noted that whilst conservation areas are important heritage assets, this should not preclude development within or adjacent to them.

Question N02- Key allocations

It is noted that the policy approach seeks to identify a number of former industrial developments within Northwich (including Winnington Works and the Wincham urban Village under policies N2B and N2C respectively). These sites have already formed part of the existing local plan and whilst their redevelopment should remain a planning policy objective, their delivery capacity in the short and medium term is likely to be limited. Care needs to be taken to ensure that Northwich has a range of different types and sizes of other sites to ensure delivery in the earlier years of the plan.

Question N05 – Settlement of the Northwich Wider Urban Area

In our view this is a matter for the officers to determine. Satellite settlements (like Weaverham, Hartford and Wincham) could remain as part of Northwich, or alternatively could be disaggregated and treated like the other settlements and villages such as Cuddington and Sandiway a little further to the west. However, as already mentioned, the lack of capacity in and around Northwich alone means that this would be impracticable. Either way, the size, transportation connections and range of community and retail services within these surrounding satellite settlements means that they would still sensibly form part of the overall spatial strategy for growth in the plan. However, disaggregating these from Northwich may prove more difficult given that there is often a contiguous settlement boundary and as such the status quo in policy terms might be preferable.

Other detailed policies

Questions GB1 and GB2 – Green Belt and open countryside policy approaches

The broad principles set out within the I&O document under GB1 appear to be sensible and compliant with the approach advocated by national policy. However, as previously mentioned, national policy agendas suggest a more pragmatic and flexible approach be taken to decision-making – especially where previously developed sites (the tests of which have been relaxed to encourage the redevelopment of such sites) or sites adjacent to existing settlements might be concerned. As such our client would wish to see this more clearly reflected within local policy, and as such it is suggested that the existing policies are not ‘rolled forward’.

Our client welcomes the recognition of grey belt as part of this policy but would be opposed to rigid criteria in this respect – any policy should rightly and properly allow the decision maker to arrive at a decision on a case-by-case basis. It is acknowledged that national development management policies could make this policy broadly redundant.

Questions TA1 and TA2 – Transport and Accessibility

Our client is supportive of the general overarching principles that are outlined within the I&O document pertaining to encouraging sustainable transport and locating new development where it can access services and facilities via sustainable modes. Should the spatial strategy seek to favour the option that seeks to locate developments along or adjacent to transit routes (which in part is supported by our client) then this ought to be reflected in the decision-making criteria. Sites and development that can be easily accessed by existing (or new) sustainable transport infrastructure should clearly be given priority over those that need more substantial road transport construction.

Question TA3 – Transport Infrastructure Priorities

It is noted that a great number of these projects are highways and road building projects that in some cases seems to run counter to the climate change emergency and approach identified in both the previous section as well as in the document overall (see answer to question SD1). Clearly there are strong possibilities provided by locating and supporting development adjacent to existing transport infrastructure and railway infrastructure and in this case these matters should clearly be brought up the agenda and allocations and spatial strategies designed to reflect the same.

Question ID1 – Infrastructure and developer contributions

In principle our client is happy to support the general approach outlined within the I&O document. Two matters for consideration might be how sites are able to help provide additional community infrastructure (such as village halls, meeting places etc) in addition to protecting those which already exist. Furthermore, there needs to be some consideration of scale of development and the ability of smaller and medium sites in meeting these requirements. In that respect our client would strongly advocate a different approach to developer contributions being considered for small and medium sites (i.e. 10 - 50 dwellings).

Question HO1 – Policy approach to housing mix and type

Our client is broadly supportive of the policy approach outlined as it seems sensible and is reflective of typical policies of this type and national guidance. However, it may be that some of this could be tied more specifically to the spatial strategy for the key settlement areas, as there may well be differing requirements for different settlements. This might be particularly the case for elderly persons or specialist housing where specific locations could be appropriate as part of the mix. The client recognises that sites with good access to shops, services and public transport would be more appropriate for including these in a mix.

Question HO4 – Affordable housing

In principle we are supportive of the approach outlined for delivery of affordable housing, although would wish to comment further once the more detailed approaches are outlined. Any policy should also respond to paragraph 67 of the NPPF where there is a requirement to consider and set levels for affordable provisions for major development in the Green Belt, which is not currently considered.

Question HW2 – Health Impact Assessments

Without a clear threshold being proposed our client could not comment on the appropriateness or otherwise, other than to say that for residential development, the health impacts should have the potential to be substantial for such an assessment to become reasonable – i.e. over 500 dwellings. Furthermore, if the plan is going to allocate certain sites for new housing it would be assumed that the health impacts of these allocations would have been addressed at the plan making stage and as such it should not be incumbent on individual applications on allocated sites to justify or provide such guidance.

Question HW3 – Amenity distances

As with all policies of this type, the genesis of amenity requirements are derived from post-war guidance which in our client's view is outdated and does not assist with achieving an efficient use of land or good urban design. Certain forms of residential development could comfortably be delivered without the need for the 21m habitable window relationship and in our view this could be relaxed. There also several examples throughout the UK where front to front distances have been reduced to 18m or even 15m and we would be happy to share these

examples with officers if that would prove useful. More generally, retaining rigid amenity requirements may work effectively for development management decision making but does not help facilitate architects and developers to meet the goals of the National Design Guide.

Question HW4 – Garden spaces

Whilst our client raises no objection to the setting of standards for amenity space (gardens), the increased range of types of houses which now exists may require garden space policies to be expanded to accommodate shared garden spaces, communal areas or even courtyards. This would better enable the plan to encourage more diverse housing typologies.

Question LA1 – Landscape policy approach

In broad terms our client is supportive of the policy approach to landscape in the I&O document. The suggestion to consider more carefully and facilitate the increased protection of the Sandstone Ridge seems sensible as the landscape quality and characteristics are clearly more special than many of the other open countryside areas surrounding many of the larger urban settlements – the hinterland of which is devoid of quality landscape due to infrastructure, horsiculture and many brownfield sites. It may be that the plan could seek to identify some of these areas of high value and lower value landscape to assist with making decisions about the allocations (see previous comments under SS21).

Question LA2 – Additional ‘green gaps’

The identification of strategic green gaps within the Green Belt is not necessary in our client’s view as the one of the five purposes of Green Belt includes provisions to maintain the separation between settlements and to stop merging and sprawl. The I&O document identifies that a green belt assessment would be undertaken which presumably would identify where the most valuable parcels of Green Belt were located against the five tests. This would act as the prime evidence to support decision making about allocations and any speculative ‘grey belt’ applications.

Question HI1 – Heritage assets

It appears that this policy would simply reflect national policy. In that respect our client has no further comment to make on this but may wish to comment on the merging Cheshire West and Chester heritage strategy when this is published.

Question DS1 – High quality design

Whilst local character and identity is important, our client believes that this should not be at the expense of appropriate innovation and change (see paragraph 135 of the NPPF). The use of the term ‘respect’ in the first line is different to being ‘sympathetic’ to local character and could prevent appropriate design evolution, innovation and wider visual improvements to an area over time. Use of the term ‘sympathetic’ would better enable innovation in house types, methods of construction, density increases and an efficient use of land to be accommodated – key objectives of the new plan.

Question DS2 – Borough wide design guide

The client would support the preparation of a borough wide design guide (subject to appropriate consultation and engagement) forming a key part of the new local plan. It is recommended, as per guidance within the National Design Guide, that any guide or code contains specific sections for larger allocated sites which would help to achieve higher quality design. Our client would be happy to work alongside the Council in developing such guidance should their land form part of an allocation.

Conclusions

Our client would like to thank the Council for the opportunity to contribute and comment on the emerging Issue and Options related to the emerging Local Plan. In many cases our client is pleased to be able to support the broad outlines included in the document, but it is noted that the level of detail provided is insufficient to definitively provide views in some instances. Nevertheless, our client considers that they have a site that will be able to strongly contribute toward the future sustainable delivery of housing growth in the Borough, and would request that the Council also considers the role that smaller and medium sites can make to the plan.

We reiterate our previous offer that should officer have any further questions or queries about our response or the site we would be delighted to speak to them. Contact details are on the first page of this letter, and my email address is below.

Yours sincerely

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Bob Phillips

MTCP(Hons), MA(Urban Design), FRTPI
Director, Planner and Urban Designer

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