

Consultation on Interim Housing Planning Policy Statement

Summary of responses

Ref No	Type	Comment
All Topics – Headline Response		
0.1	Support, generally.	Generally supportive of the proposals; endorsed are the proposals for smaller developments and staged release of land for new housing.
0.2	Object	Proposed IHPPS should be abandoned.
0.3	Object	Do not support the introduction of an IHPPS. Until such time that the new Local Plan has been tested at Examination and adopted, our client strongly considers that housing applications should be considered in the context of paragraph 49 of the NPPF if the Council is to perform with national planning policy.
0.4	Object	The Interim Housing Planning Policy Statement (IHPPS) is a document that can carry no weight in decision making. New planning policies may only be adopted by a Local Planning Authority (LPA) as part of a Local Plan, or through another Development Plan Document that has been subject of an examination in public. Do not consider that sufficient evidence has been produced by the Council to justify the IHPPS. Consider that the topic paper does not constitute an objective assessment of the future housing needs of the district, as required by the Framework. Such assessment of housing need should be carried out through an up-date of the Strategic Housing Market Assessment (SHMA). That work will be necessary before the Council is able to define any new housing requirement, taking into account the other provisions in the Framework including cooperating with neighbouring authorities.
0.5	Object	A proposed IHPPS should be abandoned as it serves no purpose, other than to bridge the gap before a future Local Plan is adopted by seeking to impose untested policy objectives that will not withstand close scrutiny. Furthermore, it is not likely that such an IHPPS will accord with advice contained in NPPF and the latest statements from Central Government concerning the delivery of new housing. NPPF has, as a key objective, to boost significantly the supply of housing (Para 47 and elsewhere). Any IHPPS that departs from that objective is likely to be accorded no weight in the determination of planning applications.
Question 1 - Do you believe that the new proposed evidence based target should be introduced post-RSS revocation?		
1.1	Support	Agree that housing number should be changed.
1.2	Support	Agree. This seems sensible.
1.3	Support	There should be no relaxation in requirement for affordable housing.
1.4	Support	There is concern that developers are going for large 3-5 bed roomed houses on green land - easy to build on - making quick profit - but not consistent with the preferred directions balance.
1.5	Support	N/A
1.6	Support	Understand may be some time before the RSS is fully revoked, however, do agree with the new evidence based

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		target as it is a more realistic and attainable figure.
1.7	Object	Until the Local Plan is adopted any proposed evidence based housing provision figure (target) should not be introduced. However, should the Council proceed any non-RSS based figure should be expressed as minima.
1.8	Object	The Authority cannot adopt an IHPPS with a different housing number than that within RSS.
1.9	Object	Premature and unjustified to introduce a new housing target so close to EiP. Put simply a different housing target cannot be introduced in accordance with National Policy without going to EiP or being produced as a DPD.
1.10	Object	The emerging target of 1,050 units per annum (based on historic completion rates) has not yet been thoroughly tested at an external examination and can be afforded no weight.
1.11	Object	It is important to set out that the Interim Housing Planning Policy Statement (IHPPS) can carry no weight in decision making. The only mechanism available to the Council to re-set its housing numbers is through the local plan process. Before revised numbers can be adopted they must be subject to rigorous examination and testing. Equally, the IHPPS cannot become SPD, even with consultation, because it does not support the development plan or add detail to policies in the plan. In fact the IHPPS is contrary to the development plan, which includes the extant RSS and housing requirement within it.
1.12	Object	The Council cannot introduce or adopt an Interim Housing Planning Policy Statement that establishes a different housing requirement from that in the Regional Strategy (RS) or which introduces other policies. A new housing requirement and other policies pertaining to residential development may only be adopted via a Local Plan (or another Development Plan Document should this be clearly justified, see paragraph 153 of the NPPF) that has been subject to an examination in public. To do otherwise is contrary to national planning policy. The RS target remains part of the development plan until the Council has carried-out an objective assessment of its housing need, then considered what its requirement is based upon this while taking into account the other provisions of the NPPF.
1.13	Support	Agree with the lowering of the site threshold. Further consideration is required with regard to definition of suitable, available and viable.
1.14	Object	There is absolutely no justification for the introduction of an Interim Housing Planning Policy Statement (IHPPS). Until such time as RSS is replaced, there is no legal basis for any policy approach which differs from that set out in RSS. There is also no evidence base to support the 1050 target. If and when RSS is replaced, then the Council should focus its resources on producing a credible evidence base to underpin a future housing target that can properly be consulted upon through the emerging Local Plan and tested via SEA.
1.15	Object	The proposed new target should not be used until it has been tested at an Examination in Public.
1.16	Object	The IHPPS is an entirely challengeable and unacceptable way in which to seek to amend housing numbers downwards to overcome a five year supply issue, which has been caused by consistent underperformance. The only mechanism available to the Council to re-set its housing numbers is through the local plan process – this is clearly

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		set out at paragraph 156 of the NPPF. The Framework is clear that Supplementary Planning Documents (SPDs) should only be adopted where they can assist in the submission of successful applications or aid infrastructure delivery.
1.17	Object	As long as Green Belt not encroached on.
1.18	Support	N/A
1.19	Object	<p>If an IHPPS were introduced it must be based on the RSS 'Option 1' housing figures (i.e. 1317 net additional homes per annum). RSS remains part of the Development Plan until such time as it is abolished following SEA, and following this then the scrutinised and independently examined RSS Option 1 housing figure should be retained until new housing figures based on credible evidence have been independently examined and adopted. Guidance on this is set out in the Secretary of State's letter dated 6th July 2010 to all Chief Planning Officers.</p> <p>The Preferred Option Core Strategy currently undergoing public consultation cannot be supported as the basis for the 1,050 figure until such time the evidence base underpinning the policy has been tested. Furthermore the NPPF requires that LPAs undertake an objective assessment of housing need through a Strategic Housing Market Assessment (SHMA).</p>
1.20	Support	N/A
1.21		<p>A IHPPS should not be prepared by the Council. However, if one were to be introduced it must be based on the RSS 'Option 1' housing figures (i.e 1317 net additional homes per annum). RSS remains part of the Development Plan until such time as it is abolished by the Government following SEA. The scrutinised and independently examined RSS Option 1 housing figures should be retained by the Council until new housing figures based on credible evidence have been independently examined and adopted. Guidance on this is set out in the Secretary of State's letter dated 6th July 2010 to all Chief Planning Officers. The letter states: "...Authorities may base revised housing targets on the level of provision submitted to the original Regional Spatial Strategy examination (Option 1 targets), supplemented by more recent information as appropriate. These figures are based on assessments undertaken by Local Authorities. However, any target selected may be tested during the examination process especially if challenged and authorities will need to be ready to defend them." The Preferred Option Core Strategy is currently undergoing public consultation and as such has not been subject to scrutiny. Therefore it cannot be supported until such time the evidence base underpinning the policy has been tested. Furthermore the NPPF requires that LPAs undertake an objective assessment of housing need through a Strategic Housing Market Assessment (SHMA).</p>
1.22	Object	<p>An IHPPS should not be prepared by the Council. However, if one is to be introduced it must be based on the RSS 'Option 1' housing figures (i.e. 1317 net additional homes per annum). RSS remains part of the Development Plan until such time as it is abolished by the Government following SEA. The scrutinised and independently examined RSS</p>

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1.28	Object	<p>Peel objects to the introduction of the proposed annual housing requirement of at least 1,050 units per annum, introduced under consultation topic 1, which represents a significant reduction on the RSS figures, a position which is contrary to the pro-growth stance taken by the NPPF. Do not accept that the proposed target is based on a robust objective assessment of the housing need facing the authority over the Plan period. The requirement proposed will not enable the authority to grow to meet its own economic aspirations and does not satisfy the roles required of the planning system as stipulated through paragraph 7 of the NPPF. In addition further evidence needs to be provided as to how the requirement recognises the assessed housing needs of the wider housing market area, with a wealth of historic evidence highlighting the housing and economic relationships between the Borough and its neighbours including Warrington and Cheshire East, with this reflected in the spatial definition of the Local Enterprise Partnership. Peel will provide a full response to the proposed housing requirement through the appropriate process as part of the consultation on the Local Plan.</p>
1.29	Object	<p>An IHPPS should not be prepared by the Council. However, if one is to be introduced it must be based on the RSS 'Option 1' housing figures (i.e. 1317 net additional homes per annum). RSS remains part of the Development Plan until such time as it is abolished by the Government following SEA. The scrutinised and independently examined RSS Option 1 housing figures should be retained by the Council until new housing figures based on credible evidence have been independently examined and adopted. Guidance on this is set out in the Secretary of State's letter dated 6th July 2010 to all Chief Planning Officers. The letter states: "...Authorities may base revised housing targets on the level of provision submitted to the original Regional Spatial Strategy examination (Option 1 targets), supplemented by more recent information as appropriate. These figures are based on assessments undertaken by Local Authorities. However, any target selected may be tested during the examination process especially if challenged and authorities will need to be ready to defend them." The Preferred Option Core Strategy is currently undergoing</p>

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		public consultation and as such has not been subject to scrutiny. Therefore it cannot be supported until such time the evidence base underpinning the policy has been tested. Furthermore the NPPF requires that LPAs undertake an objective assessment of housing need through a Strategic Housing Market Assessment (SHMA). The proposed housing figure of 1,050 dwellings per annum has not been subject to scrutiny and therefore is not credible and robust. As a minimum, the IHPPS should be clear that it does not apply until the RSS has been fully revoked.
1.30	Object	Assumes that the emergent Preferred Policy Direction of identifying not less than 21,000 new homes during the plan period 2010 to 2030 (1,050 units per annum) is correct. This assumption cannot be accepted as the figures are not based upon any credible evidence base. Indeed, the Council's latest SHMA indicates a need to provide for 18,060 units alone. RSS revocation may well be expected but without using credible and justifiable figures it is not for the IHPPS to determine a strategic policy direction that uses a figure plucked from nowhere and on this basis until such a base is produced and exists to be agreed (at Examination) then the RSS figure of 1,317 units per annum ought to be used as the default position.
1.31	Object	The RSS still comprises part of the development plan and therefore, the housing requirement is set in the development plan by Policy L4 of the RSS. The abolition of the RSS does not appear imminent. However, even if the RSS is abolished, the target set by Policy L4 remains the most recently tested figure. In a recent Secretary of State appeal decision (ref: APP/U4230 /A/11/ 2157433), the Secretary of State disagreed with his Inspector that significant weight should be attached to an interim housing target set in a non-statutory interim policy document. "The Secretary of State disagrees with the weight that the Inspector accords to the Interim Housing Figure. He notes that the figure derives from updated household growth forecasts and explicitly seeks to meet only forecast growth and demand generated within Salford; that it has not been tested at examination and has no development plan status. He considers that in this case the housing requirement should be taken from the most up to date plan, which is the RS." Although the decision refers to the RSS which was part of the development plan at the time of the decision, its abolition or otherwise is immaterial to the Secretary of State's main conclusion that the Interim Housing Figure has not been tested at examination and has no development plan status. Exactly the same will be true of the Cheshire West IHPS. As seen at a number of recent Core Strategy examinations, for example Central Lancashire and more recently Salford, a reduced housing requirement is highly likely to be found unsound by an Inspector under examination. This emphasises the point that no weight should be given to an untested requirement, particularly where unresolved objections exist. The only place these objections can be resolved is through examination. Therefore the appropriate place for the soundness of the proposed housing requirement to be tested is through the Local Plan process. The target set by Policy L4 of the RSS is one that the council supported. It is of note that the council actually committed to deliver over and above the RSS target through the Growth Point programme. The council's apparent decision to now shy away from its growth commitments is directly contrary to the Government's

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		<p>objectives as set out in the NPPF and the Planning for Growth Ministerial Statement. One concerning element of the IHPS is that it proposed to effectively write off the shortfall accumulated from 2003 to 2010. This is a fundamentally flawed approach. Unmet housing need does not cease to exist because a local planning authority decides to reset the plan period to an arbitrary date, in this case 2010. Having regard to the evidence before us we see no justification for diverting from the RSS requirement of 23,700 net additional dwellings for the period 2003 to 2021 to a lower requirement. If anything, the evidence of housing need as demonstrated in the SHMA points to a significantly higher requirement. Evidence of shortcomings in recent delivery only reinforces the point that unmet housing need will need to be met by increased levels of development in the future.</p>
1.32	Object	<p>Persimmon considers the Council cannot arbitrarily resolve to adopt a new interim target except through the Local Plan process, prepared in accordance with the Framework. Any new housing requirement should be evidence-based and tested through the plan making process and ultimately Examination. The annual housing requirement outlined in the Preferred Policy Directions Local Plan does not reflect the growth potential, or the likely identifiable need for housing present within Cheshire West and Chester. The Council's 2012 Housing Land Monitor clarifies against the Regional Spatial Strategy (RSS) target of 1,317 p.a., the current residual annual requirement is for 1,752 dwellings p.a. Furthermore, according to the 2010-Based ONS Population Projections, which will inform the 2010- Based Household Projections, it is likely a need for circa 1,300 dwellings p.a. will be identified; which is before historic shortfalls are considered. This figure supports a housing requirement close to the original RSS target. The economic growth aspirations of the area, embodied by the goals of the Cheshire and Warrington Local Enterprise Partnership, provide a platform for greater housing delivery within the Borough than what is identified through the ONS Household Projections. Indeed, as part of the Local Plan one option consulted upon was the delivery of 1,900 dwellings p.a. (38,000 between 2010 and 2030); the Council must consider what positive growth requires in terms of ensuring housing delivery is informed by economic aspirations. Such a sentiment is in accordance with the National Planning Policy Framework (NPPF), which states "every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth".</p>
1.33	Object	<p>The housing requirement contained in the Interim Housing Planning Policy Statement can be afforded minimal weight unless it is consistent with the housing requirement set out in the RSS. As the proposed housing target has not been tested it cannot be used for decision making purposes. Strongly believe that the IHPPS is fundamentally flawed by relying upon a housing requirement that is not part of the Development plan and which has not been subject to proper scrutiny and examination.</p>

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Question 2 - Do you agree with the proposals on how development should be directed?		
1.34	Object	Disagree with the proposal to introduce the new housing requirement post-RSS revocation; a new evidence based target should be tested in detail through the examination process.
2.1	Support	Agree with proposed direction of development
2.2	Support	Again this seems a sensible way to describe the various types of geographical areas in the Council Area and to allocate the extent of development expected in each.
2.3	Support, in part	Generally accepted that bulk of housing should be in urban areas and that Winsford has scope for growth. However, would not like to see further residential development of industrial sites.
2.4	Support	There is concern that developers are going for large 3-5 bedroomed houses on green land - easy to build on - making quick profit - but not consistent with the preferred directions balance.
2.5	Support	N/A
2.6	Support, in part.	Yes but with credible, evidence based and substantiated figures for the Key Service Centres.
2.7	Support	Support the broad principles for the direction of growth, with most new homes directed to Chester, Ellesmere Port, Winsford and Northwich.
2.8	Object	Whilst understandable it is wrong to assume that these four key urban areas can accommodate significant housing developments in a sustainable manner. This could create a free for all with sites being brought forward in an uncoordinated manner, providing not in the Green Belt. It should be taken forward through the Core Strategy that would identify one or two properly planned urban extensions.
2.9	Broadly supportive	Broadly agree with the proposed distribution of new housing, but believe there is a need for a reasonable amount of flexibility with regards to the location of development. Support the principle of development in the main urban areas. A sequential approach to sites and development locations should be adopted in the first instance.
2.10	Support, partly	To increase the supply of new homes the Council should look to allocated sites and safeguarded land to deliver in accordance with the presumption in favour of sustainable development. The four key settlements of Chester, Ellesmere Port, Winsford and Northwich should be the focus. There should be recognition that development may occur within and adjacent to these urban areas to bring forward development particularly where brownfield development has been stalled and where other benefits can be derived and specific needs met in accordance with the findings of the SHMA.
2.11	Support	Agree with the lowering of the site threshold.
2.12	Object	The development plan is sufficiently robust to direct development.
2.13	Generally Support	Growth is generally in accordance with the hierarchy of settlement sizes and associated services. However, would

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		note that in the absence of a 5 year housing land supply, a good deal of flexibility should be shown as to the location of new housing to ensure that an adequate housing supply can be achieved.
2.14	Object	As long as green belt not encroached on.
2.15	Support	N/A
2.16	Support, broadly	The key principal locations within the Borough are Chester, Ellesmere Port, Northwich and Winsford. These locations due to their size and infrastructure should receive a high proportion of future development. The Councils Core Strategy, once adopted, will identify the level of growth which settlements should receive. Whilst the proposals of how development should be directed are broadly acceptable, we request that paragraph 5.4 a) is revised as follows: a) The bulk of new housing is provided within and around the urban areas of Chester, Ellesmere Port, Winsford and Northwich.
2.17	Support	We agree that Northwich should be one area focussed for new housing development and the preferred one since Northwich is a town strategically well placed with its primary road, rail and river connections to the surrounding settlements.
2.18	Support, in part	Whilst the proposals of how development should be directed are broadly acceptable, propose revision to 5.4 a) as follows: a) The bulk of new housing is provided within and around the urban areas of Chester, Ellesmere Port, Winsford and Northwich.
2.19	Support, in part	The proposals are broadly acceptable, but request that paragraph 5.4 a) is revised as follows: a) The bulk of new housing is provided within and around the urban areas of Chester, Ellesmere Port, Winsford and Northwich.
2.20	Support, in part	The key principal locations within the Borough are Chester, Ellesmere Port, Northwich and Winsford. These locations due to their size and infrastructure should receive a high proportion of future development. Whilst the proposals of how development should be directed are broadly acceptable, request that paragraph 5.4 a) is revised as follows: a) The bulk of new housing is provided within and around the urban areas of Chester, Ellesmere Port, Winsford and Northwich.
2.21	Support, in part	The key principal locations of Chester, Ellesmere Port, Northwich and Winsford due to their size and infrastructure should receive a high proportion of future development. In addition to these, there are ten Key Service Centres and a range of other settlements, which whilst they are smaller in size, will have future housing development needs as well. The Councils Core Strategy, will not only set the overall level of housing development across the Borough but it will identify the level of growth which settlements should receive. The proposals are broadly acceptable, request that paragraph 5.4 a) is revised as follows: a) The bulk of new housing is provided within and around the urban areas of Chester, Ellesmere Port, Winsford and Northwich. Similarly, that sustainable greenfield sites in and around the identified Key Service Centres can deliver growth and address local needs in those areas, it is often only larger

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		developments that have the ability to deliver infrastructure requirements that simply will not arise through piecemeal incremental developments.
2.22	Support, partly	The key principal locations within the Borough are Chester, Ellesmere Port, Northwich and Winsford. These locations due to their size and infrastructure should receive a high proportion of future development. The Councils Core Strategy will not only set the overall level of housing development across the Borough for the plan period but it will identify the level of growth which settlements should receive. Whilst the proposals of how development should be directed are broadly acceptable, request that paragraph 5.4 a) is revised as follows: a) The bulk of new housing is provided within and around the urban areas of Chester, Ellesmere Port, Winsford and Northwich.
2.23	Support, in part	Chester, Ellesmere Port, Northwich and Winsford due to their size and infrastructure should receive a high proportion of future development. The Councils Core Strategy, once adopted, will not only set the overall level of housing development across the Borough for the plan period but it will identify the level of growth which settlements should receive. Whilst the proposals of how development should be directed are broadly acceptable, request that paragraph 5.4 a) is revised as follows: a) The bulk of new housing is provided within and around the urban areas of Chester, Ellesmere Port, Winsford and Northwich.
2.24	Support, in part	In principle, in line with previous representations submitted by Peel, generally support the proposed distribution of new housing across the authority. Continue to support the position taken that Ellesmere Port, alongside Chester, should continue to represent the location for the bulk of new housing. Question the validity of apparently identifying Winsford and Northwich in the same tier given their comparative limited existing infrastructure and scale of existing services. Do not, as stated through the general comments, think that it is appropriate for a proposed distribution of development land to be established in advance of the Local Plan statutory process. We believe that Ellesmere Port may indeed have the scope to play an even greater role in accommodating new housing and employment over the plan period. This will need to be considered as part of the Local Plan process in defining a proposed framework for distributing new development.
2.25	Object	No as above the NPPF makes no reference to directing residential development in this manner. Instead, the IHPPS should direct development in accordance with the three sustainability principles of the NPPF (that of economic, social and environmental) so that all applications should be determined on their own merits. Whilst agree that the majority of new homes should be focussed towards the main towns, this should not exclude sites on the edge of settlement boundaries. Paragraph 14 of the NPPF states that for plan-making: "local planning authorities should positively seek opportunities to meet the development needs of their area ... with sufficient flexibility to adapt to rapid change, unless ... any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole". In terms of decision-making, the presumption in favour of sustainable development means that where the Council's development plan is absent,

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		<p>silent or the relevant policies are out-of-date, planning permission should be granted unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Taking into consideration the need for a significant amount of Greenfield land to cater for CWaCs' annual housing requirement, it is often sites on the edge of existing settlement boundaries that are both spatially adequate, and characterised by the sustainable criteria as outlined in the NPPF. As such, sites on the edge of the urban areas of Chester, Ellesmere Port, Winsford and Northwich should be included in the IHPPS.</p>
2.26	Object	<p>IHPPS is attempting to ask strategic spatial planning questions that are best left to the emergent Local Plan Preferred Policy Directions consultation and have doubts that this consultation and the IHPPS is the best place and vehicle to influence and change spatial policy. Do not disagree with the principle of the hierarchical approach advocated and the identified roles, but must point out that growth must be proportionate and balanced whereby the largest settlements ought to take the greatest burden of new development simply because they are the most sustainable and have the best existing infrastructure. This would lead to lesser settlements of a smaller disposition taking less, but also ensuring that small settlements are not marginalised and become less sustainable. It is a matter of enhancing and building sustainable communities. Moreover, despite the claims that the Authority is keen to see growth the less than ambitious housing and employment targets paint another picture. Furthermore, recent planning decisions at the coalface of determining planning applications suggest that this agenda of growth is not accurate.</p>
2.27	Object	<p>The existing development plan provides policies on the location of new housing development, but as there is not a 5 year supply these policies must be considered out of date in accordance with the NPPF (paragraph 49), and the presumption in favour of sustainable development should apply (paragraph 14). To take any other approach is contrary to the NPPF. This is the Government's clear intention. It is not an invitation to create an interim policy to determine which locations are appropriate for growth. The NPPF provides the appropriate policies for determining what is sustainable development. If there is a need for development and a location is capable of accommodating that development, then the presumption in favour should apply and the development need should be met. We consider that a range of sites will be required across the borough to meet the immediate shortfall and also the long term needs of the borough, including but not limited to the main settlements and key service centres identified in the IHPS, and also the rural areas. The presumption in favour of sustainable development in the NPPF should secure this. Rather than the IHPS, the appropriate place to determine the distribution of new development is through the emerging Local Plan.</p>
2.28	Support, in part	<p>In terms of the preferred locations for growth, the recognition that Winsford should be one of the settlements where the bulk of new housing should be delivered is supported. Winsford is a sustainable location for additional</p>

Ref No	Type	Comment
		development as it provides a good range of services and facilities. Turning to development outside of the key service centres the consultation documents advise that small scale developments outside of the key services centres will be delivered through small infill, windfall and rural exception sites. This approach is inappropriate and does not reflect the requirements of the NPPF. It will not deliver houses that the Council need to demonstrate a five year supply of housing land.
2.29	Object	It would be helpful for the Council to clarify what the unique nature and heritage of Cheshire West and Chester is that is to be preserved. In terms of paragraph 5.5e concerned that the IHPPS will potentially have the effect of starving rural areas of much needed growth. This has been clearly articulated in the Council Rural Housing Strategy and Rural Regeneration Strategy.
Question 3 - What mechanisms could be used to ensure that the bulk of housing development comes forward in urban areas?		
3.1	Opinion	Reduction of % of affordable housing on each Scheme. Better understanding of Developers problems, cash flows etc.
3.2	Opinion	As set out in the emerging local plan. Any large scale developments should be in the towns as part of their regeneration strategy.
3.3	Opinion	Speaking to developers and identifying brownfield sites.
3.4	Opinion	The building of not just housing but also good infrastructure, employment opportunities, schools and public transport networks etc in order to make a place both sustainable and an attractive area to both live and work. The re-using of redundant buildings and of brownfield sites as long as this is economically viable. Planning policies which guarantee delivery rather than land-banking.
3.5	Opinion	To encourage the development of the main urban areas, the IHPPS should include a reference to the prospects for the release of land adjacent to the built up area, at appropriate and sustainable locations.
3.6	Opinion	Insufficient viable land in the urban areas.
3.7	Opinion	A flexible policy is promoted which seeks in the first instance priority for housing within the main urban areas, focusing on brownfield sites and sustainable urban greenfield sites. If these cannot be achieved then growth should be directed to sustainable edge of centre sites.
3.8	Opinion	Preference for development of brown field sites within urban areas.
3.9	Opinion	The use of a phrase such as “bulk of new housing”, need qualifying. However, the mechanism that would guide or control such development is an up to date development plan containing appropriate policies.
3.10	Opinion	No ‘mechanism’ should be put in place. Development should be located on the most sustainable sites, which is likely to include those adjacent to urban areas. This will protect the environment within urban areas as well as, in some

Ref No	Type	Comment
		cases, allowing the delivery of infrastructure which might not otherwise be brought forward.
3.11	Opinion	Using derelict or brownfield sites.
3.12	Opinion	As the Council has a record of persistent under delivery of housing, it should plan for an additional buffer of 20%. The Council requires additional deliverable sites to come forward now to assist it in meeting its failing housing land supply.
3.13	Opinion	By locating new housing development on the edge of the urban areas utilising greenfield land where brownfield land is not available and if necessary in order to deliver the housing requirement, utilising green belt land where the role of Green Belt as defined in NPPF is not being achieved or is superfluous.
3.14	Opinion	The Council should be cautious in its interpretation of the NPPF as it has removed the sequential approach which previously directed new development to brownfield sites in the first instance. This position is reflected in the Secretary of State's decision at Worsley, Salford (2012), paragraph 17 states: "...In response to the referral back to parties on the implications of the Framework, the Council advised that the RS policies for the sequential approach to development and for the priority locations for growth should no longer be used, as the Framework sets out new guidance. The Secretary of State agrees that the sequential approach to location of housing development is not reflected in the Framework". The NPPF requires the Council to identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirements. As the Council has a record of persistent under delivery of housing, it should plan for an additional buffer of 20%. The Council requires additional deliverable sites to come forward now to assist it in meeting its failing housing land supply. Brownfield sites in urban areas can have environmental constraints which create viability implications stalling the delivery of housing development. Therefore, should not prevent the development of sustainable greenfield sites on the edge of settlements such as Northwich.
3.15	Opinion	The Council should be cautious in its interpretation of the NPPF as it has removed the sequential approach which previously directed new development to brownfield sites in the first instance. Paragraph 17 of the NPPF only encourages the effective use of brownfield land. As the Council has a record of persistent under delivery of housing, it should plan for an additional buffer of 20%. The Council requires additional deliverable sites to come forward now to assist it in meeting its failing housing land supply. Brownfield sites in urban areas can have environmental constraints which create viability implications stalling the delivery of housing development. Therefore, should not prevent the development of sustainable greenfield sites on the edge of settlements such as Chester. These developments are much needed to ensure that the Council can deliver a five year supply plus an additional 20% buffer.
3.16	Opinion	The Council should be cautious in its interpretation of the NPPF as it has removed the sequential approach which previously directed new development to brownfield sites in the first instance. Paragraph 17 of the NPPF only

Ref No	Type	Comment
		encourages the effective use of brownfield land. As the Council has a record of persistent under delivery of housing, it should plan for an additional buffer of 20%. The Council requires additional deliverable sites to come forward now to assist it in meeting its failing housing land supply. Brownfield sites in urban areas can have environmental constraints which create viability implications stalling the delivery of housing development. Therefore, should not prevent the development of sustainable greenfield sites on the edge of settlements such as Chester. These developments are much needed to ensure that the Council can deliver a five year supply plus an additional 20% buffer.
3.17	Opinion	The Council should be cautious in its interpretation of the NPPF as it has removed the sequential approach which previously directed new development to brownfield sites in the first instance. Paragraph 17 of the NPPF only encourages the effective use of brownfield land. As the Council has a record of persistent under delivery of housing, it should plan for an additional buffer of 20%. The Council requires additional deliverable sites to come forward now to assist it in meeting its failing housing land supply. Brownfield sites in urban areas can have environmental constraints which create viability implications stalling the delivery of housing development. Therefore, should not prevent the development of sustainable greenfield sites on the edge of settlements such as Northwich. These developments are much needed to ensure that the Council can deliver a five year supply plus an additional 20% buffer.
3.18		The Council should be cautious in its interpretation of the NPPF as it has removed the sequential approach which previously directed new development to brownfield sites in the first instance. Paragraph 17 of the NPPF only encourages the effective use of brownfield land. As the Council has a record of persistent under delivery of housing, it should plan for an additional buffer of 20%. The Council requires additional deliverable sites to come forward now to assist it in meeting its failing housing land supply. Brownfield sites in urban areas can have environmental constraints which create viability implications stalling the delivery of housing development. Therefore, should not prevent the development of sustainable greenfield sites on the edge of settlements. These developments are much needed to ensure that the Council can deliver a five year supply plus an additional 20% buffer.
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Ref No	Type	Comment
		buffer.
3.20	Opinion	The Council should be cautious in its interpretation of the NPPF as it has removed the sequential approach which previously directed new development to brownfield sites in the first instance. Paragraph 17 of the NPPF only encourages the effective use of brownfield land. As the Council has a record of persistent under delivery of housing, it should plan for an additional buffer of 20%. The Council requires additional deliverable sites to come forward now to assist it in meeting its failing housing land supply. Brownfield sites in urban areas can have environmental constraints which create viability implications stalling the delivery of housing development. Therefore, should not prevent the development of sustainable greenfield sites on the edge of settlements, such as Winsford. These developments are much needed to ensure that the Council can deliver a five year supply plus an additional 20% buffer.
3.21	Opinion	It is not appropriate to introduce policy mechanisms as an interim position in advance of the statutory Local Plan process. The weight these mechanisms would carry would be limited therefore undermining their worth and effectiveness of implementation. The NPPF provides a clear policy position against which planning decisions should be tested. The presumption in favour of sustainable development should be used by the authority to enable development which is sustainable across the authority. Through the Local Plan the Council should adopt a clear framework for distributing new development which could use a criteria and capacity based assessment.
3.22	Opinion	The suggestion made by this question would lead to a natural answer being one where new development is concentrated on PDL (brownfield) land only, but this is would be the simple answer. The fact is that the Council managed to sterilise past growth by having a policy of restraint from 2003 to 2008, which resulted in high density apartment living and poor quality schemes being developed. A return to imposing PDL levels would simply exacerbate this situation. Even the former PPS3 recognised the damage this policy had on towns and cities. NPPF reinforces the need to be a lot more pragmatic and as such encourages Authorities to review Green Belt boundaries and seek release in order to promote sustainable development. The Authority must address the sustainable growth of its settlements as to fail now will result in another 20 years of unsustainable growth which will inevitably harm the competitiveness of the Authority.
3.23	Opinion	There are already policies in place that seek to direct development towards the urban area and it is clear that these policies have been a barrier to the delivery of development with the consequence that Cheshire West has been unable to deliver a five year supply of housing land. The IHPPS should not perpetuate this situation but instead it should seek to deliver housing in suitable locations where deliverable outcomes can be achieved. This approach is clearly supported by the Secretary of State and Inspectors in recent appeal decisions. In the absence of a 5 year housing land supply the approach to delivering new development is set out in paragraph 14 of the NPPF applies. The IHPPS should seek to direct development to sustainable locations and support residential development unless

Ref No	Type	Comment
		any adverse impact of the development would significantly demonstrably outweigh the benefits when assessed against the policies in the NPPF. It is clear that land adjacent to the urban area of Winsford and Moulton are sustainable locations, which meet the requirement. It is inappropriate for the IHPPS to seek to focus the bulk of development in existing urban areas particularly as these areas have failed to deliver housing completions in the past.
3.24	Opinion	Disagree with the question. The appropriate mechanism is the Local Plan which will be published in due course. In the meantime, and until the Council has a five year land supply, the guidance in the Framework Para 49 should apply.
Question 4 - What mechanisms could be used to ensure 'managed growth' within the rural areas?		
4.1	Opinion	Seek partnerships with local Parish Councils to gain better understanding of their particular issues. Ensure sufficient infrastructure is delivered alongside any new developments.
4.2	Opinion	A simple percentage growth could be used such as 5% over the 20 years 2010-2030. In our village of Whitegate & Marton we have 550 houses so this would mean 25 or so houses over 20 years. We feel this could be best achieved through sensitive infill but not a "free for all". We also feel development of some affordable housing would be appropriate and have agreed the following statement: To help with the general problem of a lack of housing and to help ensure the village has a healthy mix of families and properties we the W&MPC would like to encourage the development of a small number of mixed/ affordable housing in the village that fully takes into account the needs of existing residents whilst enabling younger families to live and contribute to our community. If done sensitively we feel this will not only not detract from what the village is now but will add something positive to our village life.
4.3	Opinion	Ensure that only small scale development is permitted in the rural areas. A possible exception would be the use of previously developed land.
4.4	Opinion	Speaking to developers and identifying brownfield sites.
4.5	Opinion	There should be restrictions on how many properties can be built at any one time. Growth should be phased, proportionate and incremental to the size of the settlement. It should be in appropriate locations, balanced to meet the overall identified local need and of a scale and mass that complements the present built environment.
4.6	Opinion	A similar reference is made in paragraph 5.5(a) in order to accommodate growth in and adjacent to the Key Service Centres.
4.7	Opinion	Managed growth is and should be managed through Core Strategy. Policy could prejudice Core Strategy and create a series of ad hoc developments.
4.8	Opinion	Ensure that only small scale developments are permitted within the rural area.

Ref No	Type	Comment
4.9	Opinion	The use of phrases such as “bulk of new housing”, “smaller scale” need qualifying. However, the mechanism that would guide or control such development is an up to date development plan containing appropriate policies.
4.10	Opinion	It is not appropriate to impose mechanisms to ensure ‘managed growth’ when there is an absence of a 5 year housing supply. NPPF is clear that local authorities need to boost the supply of housing and to do this they must identify an annual supply of specific deliverable sites sufficient to provide 5 years’ worth of housing against their housing requirements.
4.11	Opinion	Continue with the rules on development and not utilise the relaxing of the green belt laws.
4.12	Opinion	Initial policy meetings between the Planning Department and Rushton Parish Council. Pre-application discussions between the Planning Department, Developers and Parish Council.
4.13	Opinion	Set an overall target but treat each case on its merits. Applying for example quotas for each rural settlement would be too rigid.
4.14	Opinion	The rural areas must be allowed to grow, become more sustainable and attract development proportionate to their current position in a sound settlement hierarchy.
4.15	Opinion	The saved local plan policies can be used to manage growth in the rural area. In the context of an absence of a 5 year land supply, the guidance set out in paragraphs 49 and 14 of the NPPF applies and the advice contained within these paragraphs sets out the appropriate mechanism for delivering new residential development. There is, therefore, already a mechanism in place for managing growth in the rural area set out in the NPPF which obviates the need for the IHPPS.
4.16	Opinion	Disagree with the question. The appropriate mechanism is the Local Plan which will be published in due course. In the meantime, and until the Council has a five year land supply, the guidance in the Framework Para 49 should apply.
4.17	Opinion	The use of such a phrase needs qualifying. However, the mechanism that would guide or control such development is an up to date development plan containing appropriate policies.
Question 5 - What should be classed as ‘small scale’ developments in areas outside of the key service centres?		
5.1	Opinion	Up to 12 dwellings
5.2	Opinion	Do not feel any small scale developments should be allowed in open countryside rather any development being infill. There may be small scale developments on the fringes of key service centres but the size should be determined on an individual basis rather than setting a figure that sets a precedent.

Ref No	Type	Comment
5.3	Opinion	Three or more dwellings per 0.1 hectare.
5.4	Opinion	A maximum of 10% growth over a five year period.
5.5	Opinion	The appropriate scales of development at particular centres and on particular sites will vary between the nine centres because of the different levels of constraints that will be evident in relation to those settlements. Therefore, IHPPS should indicate, at the very least, that development in these settlements will be directly related to the unconstrained opportunities for sustainable growth, within or on the edge of the towns and at a scale that relates to the size of the settlement, its landscape setting and the capacity/range of facilities and services available within the existing urban area.
5.6	Opinion	Less than 100 units and not judged on site areas.
5.7	Opinion	1 - 5 properties where defined as windfall or infill 5-10 properties on open sites
5.8	Opinion	The Council appears to be using "Urban area" as code for "within existing policy boundaries". However, the question of what is an appropriate scale of development within a particular settlement relates to the consideration of a number of variables and opportunities and not just some mathematical formula or similar approach.
5.9	Opinion	A settlement hierarchy methodology needs establishing to determine the settlement hierarchy for development purposes. Ribble Valley Borough Council has a methodology that scores each settlement on the level of local services and facilities data as well as the accessibility to each. This then produces a settlement hierarchy that can be used to direct development so that its overall size is in relation to the settlement and those of neighbouring developments and populations. Although there are constraints it does provide a general indication of the main settlements and key services centres and in addition, highlights the more rural settlements, which in turn can be grouped together. An alternative to, or in addition, a number of key service centres can be assigned a minimum number of new homes applicable for all key service centres, such as 60 units. 60 units is, on average, a build time of two years for a mainstream developer and therefore provides a scheme with a delivery timescale to ensure inclusion of all the dwellings in the 5 year supply.
5.10	Opinion	Flexible. Site specific in relation to infilling. Strict control of development of windfall sites to avoid encroachment into open countryside, unless the proposals include affordable housing within or on the edge of Eaton and/or other facilities e.g. public open space and areas for sport and recreation.
5.11	Opinion	To be treated on their merits.
5.12	Opinion	It is unclear at this stage what the Council means in terms of "small scale". The emerging Core Strategy will define the overall level of housing development across the Borough and the proportion of development which should be

Ref No	Type	Comment
		apportioned to settlements. Therefore, should not be seeking to limit development but should be promoting housing development in line with the NPPF to ensure that a five year housing supply can be delivered.
5.13	Opinion	It is unclear at this stage what the Council means in terms of “small scale”. The emerging Core Strategy will define the overall level of housing development across the Borough and the proportion of development which should be apportioned to settlements. Therefore, should not be seeking to limit development but should be promoting housing development in line with the NPPF to ensure that a five year housing supply can be delivered.
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5.15	Opinion	It is unclear at this stage what the Council means in terms of “small scale. The emerging Core Strategy will define the overall level of housing development across the Borough and the proportion of development which should be apportioned to settlements. Therefore, should not be seeking to limit development but promoting this in line with the NPPF to ensure that a five year housing supply can be delivered.
5.16	Opinion	It is unclear at this stage as to what the Council means in terms of “small scale”. The emerging Core Strategy will define the overall level of housing development across the Borough and the proportion of development which should be apportioned to settlements. Therefore, the IHPPS should not be seeking to limit development but should be promoting housing development in line with the NPPF to ensure that a five year housing supply can be delivered.
5.17	Opinion	It is unclear at this stage what the Council means in terms of “small scale”. As stated above, the emerging Core Strategy will define the overall level of housing development across the Borough and the proportion of development which should be apportioned to settlements. Therefore, should not be seeking to limit development but should be promoting housing development in line with the NPPF to ensure that a five year housing supply can be delivered.
5.18	Opinion	It is unclear at this stage what the Council means in terms of “small scale”. The emerging Core Strategy will define the overall level of housing development across the Borough and the proportion of development which should be apportioned to settlements. Therefore, should not be seeking to limit development but should be promoting housing development to ensure that a five year housing supply can be delivered.
5.19	Opinion	Do not agree that the hierarchy is right and that there are many of the identified “key service centres” where a development of less than 20 units would be considered “small scale” and in settlements not identified as key service centres small scale could be considered as being 10 units and less. The reason being is that anything over this ought to come forward as part of the Local Plan process as it is likely to have strategic, spatial and sustainable impacts,

Ref No	Type	Comment
		particularly where they happen to be cumulative in nature.
5.20	Opinion	Paragraph 5.4 of the topic paper advises that small scale developments will be delivered through small infill and windfall sites and rural exception sites. This is considered inappropriate. Given the housing requirements for Cheshire West and Chester and the significant reliance placed upon the rural area for delivering this requirement, it seems inappropriate to use the term 'small scale' to define the level of development that is appropriate outside of the key service centres. The quantum of housing directed towards villages outside of the key service centres should reflect the facilities available and the ability of a particular village to accommodate further growth without conflicting with wider policies in the NPPF and development plan. The IHPPS should refer to the development of 'sustainable' rural sites rather than 'small scale'.
Question 6 - What approaches should be used to ensure that communities feel fully engaged in development proposals pre-application?		
6.1	Opinion	Parish Council consultations
6.2	Opinion	Use Parish Councils to engage parishioners through existing mechanisms including existing communication methods such as newsletters and web site. Involve community in developing a Neighbourhood plan where communities can engage in the development of preplan proposals.
6.3	Opinion	A thorough consultation should take place; this doesn't always happen.
6.4	Opinion	Provide evidence that the authority is listening to local communities and acting to support strong wishes from these towns and parish councils - of whom few if any object to the authority and area targets.
6.5	Opinion	Consultation and meaningful local forums particularly linked with local councils.
6.6	Opinion	Essential that developers consult with communities no matter what size their development is. Should provide evidence based justification for the need, in that area, of what they are proposing to build and they should display good knowledge of the community, its environs and the impacts that development will have.
6.7	Opinion	Consultation proportionate to the size of the development proposed.
6.8	Opinion	The Council's statement for community involvement and NPPF provide an appropriate framework and direction for ensuring that communities are engaged in pre-application consultation. Any IHPPS should reiterate the requirements of the NPPF and Localism Act (2011), but should provide flexibility such that any consultation undertaken is reflective of the nature and scale of proposals and their location.
6.9	Opinion	Consultation, communication, consideration and engagement with Neighbourhood Plan
6.10	Opinion	This policy approach has already failed to deliver the required amount of housing. The council must recognise the undeniable need for the release of deliverable housing land and it is clear that this must include Greenfield Land. The involvement of communities is, of course, important, but any such involvement must be responsible and

Ref No	Type	Comment
		informed, otherwise, such involvement may block necessary development. It is vital that the Council makes this clear to communities (and adopts a similar approach itself).
6.11	Opinion	Firstly ensure that pre-application fees are maintained at a reasonable level so developers engage in pre-application discussions early within the development process. Secondly, set out minimum consultation requirement for schemes of various sizes. This will ensure consistency between different development proposals, clarity for developers on what is expected of them, and clarity for local residents on what can be reasonably expected of them. A number of local authorities require (as a validation necessity) that developers carry out pre-application community consultation where significant applications are involved (such as applications subject to an EIA, above 30 dwellings and over 1 hectare).
6.12	Opinion	Make information more readily available and do not make it difficult to find on the web site, like this consultation is. Do not assume everyone has access to the Internet.
6.13	Opinion	Open meetings. Rushton is a Parish that participates in development issues guided by its Parish Plan and encouraged through its quarterly newsletters. Recently some 80 residents attended a meeting to discuss a developer's proposals for the site of the former Red Lion public house.
6.14	Opinion	Community engagement such as exhibitions and public meetings in the relevant locality where appropriate and of scale.
6.15	Opinion	The Council's adopted Statement of Community Involvement (SCI), July 2009, provides guidance to developers and house builders around the engagement of communities pre-application. The NPPF provides guidance to local authorities as to the expectations of their role in encouraging pre-application consultation with communities (Para 189). Therefore do not think it is necessary as part of an Interim Statement outside of the SCI to produce supplementary guidance.
6.16	Opinion	Communities are already engaged through the pre-application process and whilst cannot speak for other agents/applicants the schemes we promote involve a significant amount of front loading with the involvement of local and statutory stakeholders, residents and officers prior to submission. The expectation for engagement, through the Localism Act and NPPF, has raised awareness and interest in this arena and the obligations to engage already exist and are sufficient.
6.17	Opinion	Follow the guidance in the Framework
Question 7 - Do you agree with the proposed role for each area?		
7.1	Support	Agree.
7.2	Support	Generally seems a common sense approach
7.3	Support	Provided that 'role' means 'allocation'. We agree with 4,200 as the target for Northwich.
7.4	Support	N/A

Ref No	Type	Comment
7.5	Support except for e)	Yes for a, b, c, and d. However do not agree with the “on the edge of “statement, which invites the circling of villages with another village. Whenever possible sites should be brownfield but should also be appropriate in position to the surrounding area. Where edge of settlement development is the only option it should be small scale and must not be obtrusive. It should complement and integrate smoothly with the adjacent built environment.
7.6	Support	In broad agreement with the roles for the settlements as set out.
7.7	Object	More focus on Key Service Centres and rural areas where there has been little development and capacity for new houses. Four settlements could suffer from over supply and a dysfunctional housing market.
7.8	Broadly supportive.	With regards to Chester we fully support its identification as a sub-regional city and that its housing growth should be reflective of its employment, retail and tourism roles. This places the greatest emphasis for housing delivery on Chester.
7.9	Not specified	It is clear that in Ellesmere Port brownfield sites are not being delivered as quickly as hoped but brownfield sites are not the complete answer to local regeneration issues. The contribution that greenfield sites can make to meeting regeneration objectives should not be overlooked.
7.9	Support	Aware that within Northwich there is many hectares of brownfield sites and would request that these sites are developed to revitalise the town centre.
7.10	Object	Despite the need for housing and under supply of the Council continues to suggest roles that fail to deliver housing.
7.11	Support, generally	Care needs to be taken when expressing reliance on brownfield delivery because there is not a guarantee that these sites are automatically deliverable due to potential viability constraints. This is reflected in the NPPF, which does not promote a sequential approach to the selection of sites. This is made clear in the SoS decision letter relating to the Burgess Farm site in Salford (APP/U4230/A/11/2157433).
7.12	Object	N/A
7.13	Support	N/A
7.14	Support, in part	The Vale Royal settlement policy boundary and hierarchical approach to development identified Winsford as a Tier 1 location. The role of Winsford as referenced in the IHPPS should therefore be amended. A stronger reference to the future needs of these Tier 1 settlements should be made rather than “scope to grow”. Winsford has significant infrastructure and represents a sustainable location for future housing development. Therefore future development in and on the edge of Winsford should be acceptable and the IHPSS should be amended accordingly.
7.15	Object in part	Northwich should assume a higher role for the reasons mentioned in answer to Q2.
7.16		The Vale Royal settlement policy boundary and hierarchical approach to development identified Northwich as a Tier 1 location. The role of Northwich as referenced should therefore be amended. A stronger reference to the future needs of these Tier 1 settlements should be made rather than “scope to grow”. Northwich has significant

Ref No	Type	Comment
		infrastructure and represents a sustainable location for future housing development. Therefore future development in and on the edge of Northwich should be acceptable.
7.17	Support, in part	We agree with the identification of Chester as a sub-regional City to be supported with housing growth reflective of its role in providing employment, retail and tourism. In view of the Council's Green Belt Review and acknowledgement in the background papers to the Preferred Policy Directions that there will be a requirement to release Green Belt land around Chester for housing, this should be acknowledged here. It should also be confirmed that Chester, as the main settlement in the Borough will be the receiver of the majority of new housing development for which it is acknowledged there is an acute need.
7.18	Support, in part	The Vale Royal settlement policy boundary and hierarchical approach to development identified Northwich as a Tier 1 location. The role of Northwich as referenced in the IHPSS should therefore be amended. A stronger reference to the future needs of these Tier 1 settlements should be made rather than "scope to grow". Northwich has significant infrastructure and represents a sustainable location for future housing development. Therefore future development in and on the edge of Northwich should be acceptable.
7.19	Object, in part	The Vale Royal settlement policy boundary and hierarchical approach to development identified Northwich and Winsford as a Tier 1 location. The role of both Northwich and Winsford as referenced should therefore be amended. A stronger reference to the future needs of these settlements should be made rather than "scope to grow". Future development in and on the edge of Northwich and Winsford is acceptable and the IHPSS should be amended accordingly. As currently drafted, the IHPSS does also not sufficiently distinguish between the status of different settlements within the rural area, in particular, the role of Key Service Centres. This is an important point as the Key Service Centres are recognised in the emerging Core Strategy as the primary focus for development and growth in the rural area. As such, the Council's approach to sustainable development on sites in and around the Key Service Centres will be different to that relating to sites more generally in the rural area. The current policy wording reads as follows: 'Small scale developments outside of the Key Service Centres could be delivered through small in-fill through small infill and windfall sites, and rural exception sites'. The scale of development proposed in the emerging Core Strategy in the Key Service Centres is likely to exceed the capacity of any available infill sites and therefore, larger sustainable greenfield extensions are likely to be required. The current reference (above) should therefore be made clearer and more precise and to read as follows: 'Small scale developments in other settlements outside of the Key Service Centres'
7.20	Support, in part	The role of Chester as an area identified for housing growth is supported.
7.21	Support, in part	The Vale Royal settlement policy boundary and hierarchical approach to development identified Winsford as a Tier 1 location. The role of Winsford as referenced should therefore be amended. A stronger reference to the future needs of these Tier 1 settlements should be made rather than "scope to grow". Winsford has significant infrastructure and

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		represents a sustainable location for future housing development. Therefore future development in and on the edge of Winsford should be acceptable and the IHPSS amended accordingly.
7.22	Support, in part	Generally support the broad definitions of the proposed roles for each of the delivery areas listed. In line with previous representations submitted as part of the Local Plan process endorse the significant potential of Ellesmere Port to deliver new housing and employment sustainably. Also continue to support the status given to Ellesmere Port as a key contributor to housing delivery in the context of the need to continue to deliver regeneration benefits and attract further inward investment into the area. This role needs to be recognised in terms of the wider functional relationships of Ellesmere Port with both Chester and the employment centres within Merseyside. The strategic importance of the town and surrounds is established through the Atlantic Gateway proposals as well as the Cheshire and Warrington LEP Business Plan. Do not object to the very broad role definitions given to the other delivery areas would expect these to be developed further through the Local Plan process and will provide comments on this through that process.
7.23	Object	Strategic spatial planning questions that are best left to the emergent Local Plan Preferred Policy Directions consultation. Do not disagree with the principle of the hierarchical approach advocated and the identified roles, but must point out that growth must be proportionate and balanced whereby the largest settlements ought to take the greatest burden of new development simply because they are the most sustainable and have the best existing infrastructure. This would lead to lesser settlements of a smaller disposition taking less, but also ensuring that small settlements are not marginalised and become less sustainable. It is a matter of enhancing and building sustainable communities. Moreover, despite the (publicity) claims that the Authority is keen to see growth the less than ambitious housing and employment targets paint another picture. Furthermore, recent planning decisions at the coalface of determining planning applications suggest that this agenda of growth is not accurate.
7.24	Object	The existing development plan provides policies on the location of new housing development, but as there is not a 5 year supply these policies must be considered out of date in accordance with the NPPF (paragraph 49), and the presumption in favour of sustainable development should apply (paragraph 14). To take any other approach is contrary to the NPPF. The correct response to the shortfall in the 5 year supply is to apply the NPPF presumption in favour of sustainable development. This is the Government's clear intention. It is not an invitation to create an interim policy to determine which locations are appropriate for growth. The NPPF provides the appropriate policies for determining what is sustainable development. If there is a need for development and a location is capable of accommodating that development, then the presumption in favour should apply and the development need should be met. We consider that a range of sites will be required across the borough to meet the immediate shortfall and also the long term needs of the borough, including but not limited to the main settlements and key service centres identified in the IHPS, and also the rural areas. The presumption in favour of sustainable development in the NPPF

Ref No	Type	Comment
		should secure this. Rather than the IHPS, the appropriate place to determine the distribution of new development is through the emerging Local Plan.
7.25	Support, in part	The recognition that Winsford should grow in support regeneration is supported. The town centre requires significant inwards investment. The development of new houses in and around the town will improve the town centre by increasing retail expenditure in the area. Development should take place adjacent to rural settlements that reflect the facilities available within the village and the ability of the settlement to accommodate further growth without conflicting with wider policies in the NPPF or development plan. The test for development within the rural area should be whether the development is sustainable.
7.26	Object	Disagree with this question as this is a matter that should be determined within the Local Plan process.
Question 8 - What could constitute 'very special circumstances' to warrant development in the Green Belt?		
8.1	Opinion	This is too difficult to define without having some test case / examples.
8.2	Opinion	People like to know which of the discounted sites are within the ten areas of Green Belt review - and which are in GB rural villages e.g. Mickle Trafford. It's possible that some 'special circumstances' have already been created by the review that has been published for the ten areas. Hopefully the new SHLAA will help.
8.3	Opinion	Would have to be dealt with on a case by case basis.
8.4	Opinion	Very special circumstances refer to a specific development being proposed. In this case you need to specify the development in question. However your question relates to ANY development by the nature of the question. Contest the validity of consultation when one vital question which could result in harm to Chester's green belt via mass development - unspecified - has been posed in a highly ambiguous and technically incorrect way.
8.5	Opinion	If the community agrees that the development enhances the natural environment and provides valued amenities or facilities.
8.6	Opinion	When there is no further room for development to allow the community to have a sustainable future
8.7	Opinion	A small community wishing to provide, within their settlement boundary, some infill development or to create an exception site to provide for affordable housing for local people. Possible infrastructure development although this would only be considered having full regard for its impact and would be subject to strict ecological and environmental mitigation measures imposed. Possible release of small pockets of Green Belt if it was land of poor quality. Lost green space should be replaced elsewhere locally and again strict mitigation measures imposed. The Green Belt must never be eroded to such an extent that the boundaries between towns and villages become blurred.
8.8	Opinion	The need to provide development land from areas designated as Green Belt is primarily a matter for the Development Plan. Whilst a critical shortage of development land may be regarded as a "very special circumstance"

Ref No	Type	Comment
		that warrants the release of such sites, that approach is not always supported by the Inspectorate in the absence of emerging changes to areas of Green Belt in a Development Plan.
8.9	Opinion	Demonstration of very special circumstances needs to be tied to evidence of a significant lack of delivery of housing within a particular settlement, and a proven lack of availability of alternative brownfield or sustainable greenfield sites within the settlement or at its edge.
8.10	Opinion	Where there is no availability of brownfield sites or suitable greenfield sites where a local need for development has been identified.
8.11	Opinion	Restriction of time for developers to complete a project to prevent land banking for financial gain.
8.12	Opinion	The approach to Green Belt release is well established in National policy and it is inappropriate for the Council to seek to redefine such matters.
8.13		<p>Based on the specific local position, thrust of NPPF and the Queensway SoS decision, 'very special circumstances' would consist of:</p> <ul style="list-style-type: none"> • a contribution to the 5 year housing supply; • the protection of urban green spaces; • the protection of the highest quality Green Belt; • the protection of a historic centre; • the delivery of a more sustainable pattern of development than without the release of Green Belt, and; • a material additional benefit, such as strategically important infrastructure provision (for example a Park and Ride facility). <p>First two points are likely to apply equally to all Green Belt sites on the edge of a given urban area. The final four points will therefore prove the most important in the identification of individual sites. This makes it abundantly clear how beneficial sites that can also meet infrastructure requirements for the wider area will be.</p>
8.14	Opinion	None. Green belt should be preserved at all costs.
8.15	Opinion	Not appropriate as Rushton Parish is not within the green belt, but the Parish Council considers its open countryside status should afford the same level of protection against unsuitable development as would apply within the green belt. The only special circumstances that might apply are where a proposed development on the fringe of the Village includes an even greater level of planning gain than might apply to the development of a windfall site eg. a higher proportion of affordable housing and a larger area of public open space and recreational facilities.
8.16	Opinion	If land does not meet the functions of Green Belt as set out in NPPF and in any event where there is an unsatisfied requirement for new housing.
8.17	Opinion	Whilst the exceptions to preventing new residential development within the Green Belt are outlined in the NPPF;

Ref No	Type	Comment
		consideration should also be given to site specific circumstances that would warrant development in the Green Belt. For example, existing uses within the Green Belt may be physically constrained and in need of land for expansion, with the only option of utilising land outside of their ownership. Where this is the case, in order to cross fund the loss of land to a lower value use, the remaining part of a site may need to be developed for residential development. If this was unable to happen due to Green Belt restrictions this could hinder the future of existing uses within the Green Belt preventing them from improving and expanding. 'Very special circumstances' should therefore be extended to allow for an assessment on a site by site basis that enables specific circumstances to be taken into account in the consideration of Green Belt release.
8.18	Opinion	Do not support the need to provide a local definition for 'very special circumstances'. PPG2 did not define what constituted very special circumstances, nor does the NPPF. It is not appropriate for the Council to seek to provide its own definition or even to provide an indication of what could constitute very special circumstances. This is a matter for judgement on an individual case basis.
8.19	Opinion	In the context of the IHPPS we would consider that under delivery and under supply would hold significant material planning weight in demonstrating very special circumstances. As any Planning Barrister will advise, there is no one panacea and it is generally a suite of benefits that cumulatively provide for a VSC case.
8.20	Opinion	It is inappropriate to try to define very special circumstances in any form of policy document. If it was appropriate to define very special circumstances it is suggested that this would have been done in the NPPF. Very special circumstances will need to be reviewed on a case by case basis.
8.21	Opinion	Applications should be decided on a case by case basis and be decided in conjunction with Planning Law.
Question 9 - Are there other mechanisms that could be used to encourage developments to be built out?		
9.1	Opinion	Reduce the current planning permission life from 5 to 3 years and stop developers using the system to extend permissions.
9.2	Opinion	Asking communities for positive developments rather than always thinking people are only thinking of restricting development. Are there case studies for developments where communities have welcomed development or where affordable/mixed development has gone - well?
9.3	Opinion	Assurance that developers start on site before seeking permission for others. Developers should also be encouraged to employ local labour and offer apprenticeships.
9.4	Opinion	That any approval is given a realistic time limit for starting. This is to avoid land banking. Provide support for Housing Associations to build properties for rent or shared ownership.
9.5	Opinion	None proposed.

Ref No	Type	Comment
9.6	Opinion	For large scale housing developments there should be no outline applications. Applications should be “full” so that communities are aware of exactly what will be imposed upon them. Developers should provide a financial report showing that they are economically able to build and a timeline agreed with the LPA showing build out time. There should be financial penalties set under the S106 Agreement for not building or if an agreed number of properties is not built, fit for occupancy, within a specified time then they should be asked to re-apply for planning permission.
9.7	Opinion	Welcome pre-application discussions, where the Development Plan is not up to date and does not provide a sufficient benchmark against which to evaluate applications for development. Council should not consider the introduction of pre-application charges, which will run counter to the initiative set out in the IHPPS. Agree with planning applications being supported by a statement setting out anticipated timescale for the delivery of the proposed new homes. However, such timescales are indicative as they have to make assumptions about the actions of other parties involved in the determination of applications, such as statutory consultees. Will also make assumptions completion of any necessary Planning Obligations. Consider the approach to Section 106 Agreements appropriate. Also consider that any payments due under the S106 should be geared to the completion of the new homes and any thresholds or trigger points that may be identified, e.g. the point at which additional school places may need to be funded.
9.8	Opinion	Not directly an issue of planning policy more of development management. Need to avoid unnecessary planning conditions often imposed by statutory consultees and note delays caused by strategic land management companies gaining approval to sell on the land, which then requires tender process and reserved matters application to be submitted and approved.
9.9	Opinion	Support collaboration between the Council and developers to better understand build programmes for sites and agree helpful for developers to provide likely build programmes and when completions might be occupied. Do not support the application of Section 94 with regard the service of completion notices, after which on expiry of the date permission is lost. Given the nature of development the reasons for ceasing are unlikely to be resolved through the service of a Section 94 notice. The reasons are more likely to be triggered on housing market, availability of finance and costs. As an alternative the Council ought to apply a flexible approach to Section 106 contributions in order to minimise the costs and risks to developer with regards freeing up working capital. Section 106 costs should be phased where possible, allowing development value to be realised early on and in cross funding infrastructure provision.
9.10	Opinion	Housing releases in Ellesmere Port and Northwich have been concentrated to a significant extent on Brownfield land. The Council is already aware of viability issues and in the case of Northwich 10 Brownfield sites allocated in the Vale Royal Local Plan have never come forward even at the height of the property market. In the absence of clear evidence of sites being ‘banked’ in the manner suggested, there is no need to pursue policies of the type

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		suggested. The priority should be to identify and release sites which are viable and in the right location to meet market demand so that development can be delivered.
9.11	Opinion	We do not believe that any such mechanisms should be imposed. The premise that this consultation topic is based on is not correct. It is stated that there is concern that developers will simply ' <i>bank</i> ' planning permissions and not bring sites forward. This is rarely the case. Having committed the time and expenditure to securing a planning permission, the vast majority of land owners look to secure a return on that investment as quickly as possible. This is usually either through building out the consented scheme or selling the site to a developer. Section 106 Agreements should only cover those items which pass the tests set out in Community Infrastructure Levy (CIL) Regulation 122. They must be proportionate to the development and required to make the development acceptable in planning terms. S106s are not a mechanism for local authorities to share in the profits of development. In cases where developers are able to meet the appropriate, evidenced policy requirements in full, S106s should make no provision for a review of viability. Such reviews of viability may be appropriate where the Council has accepted a reduced level of contributions (typically a reduction in the level of affordable housing) in order to ensure that the development is initially viable. Phasing of payments would be welcomed as it would assist in ensuring the viability of development as a consequence of the cash flow profile of residential projects which has been previously set out. Council can assist by being proactive and open-minded to developer's requests to reconsider the viability of existing consents. DWH have had experience of attempting to renegotiate a S106 Agreement with the Council as part of the Winnington Urban Village consortium. The time taken to move those discussions forward significantly delayed the delivery of new homes on a strategically important, brownfield site
9.12	Opinion	Expiry dates on planning permissions. State expenditure on infrastructure to accommodate development – roads, sewers, surface water drainage. However, the rate of development cannot be controlled by mechanisms, the state of the Economy and the Housing Market are the key factors controlling the demand and supply of housing development land.
9.13	Opinion	Yes, extending time limits for submission of reserved matters/completion of development as a faster method of getting housing completions rather than having developers/applicants having to re-apply, a time consuming process. This is a government initiative anyway. Don't agree with service of completion notices unless in exceptional circumstances.
9.14	Opinion	In considering alternative mechanisms firstly, with the exception of proposal (a), do not support the proposed mechanisms set out. Believe that individual developments should be judged on a case by case basis rather than considering the introduction of a set of general proposals, as set out under Consultation Topic No. 4. The unique development and market context on individual sites will make the consistent application and the validity of such a requirement as set out in proposal (b) impossible. Nationally there is a clear message around the importance of

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		<p>applying flexibility in the application of S106 agreements in order to ensure that these do not serve to create blockages for the delivery of development. The current wording of proposal (c), however, is far too ambiguous, therefore serving to remove rather than add to a position of certainty for developers, the risk being a further slow-down in activity. Do not consider that point (d) is appropriate and are of the opinion that the introduction of such a mechanism would have the opposite of the desired effect in that it would be likely to stifle rather than increase development activity across the authority. The provision of a suitable supply of deliverable land represents the fundamental role of the planning system to ensure the delivery of housing to meet current and future needs and to support wider growth and economic regeneration. The actual realisation of development is linked to a wider array of market factors over which planning policy has limited control or influence, including the availability of development and household finance and confidence levels in the market place. The Council should adopt a pro-active response to growth and give greater confidence and clarity through the planning process.</p>
9.15	Opinion	<p>Agree with to ensure that approved dwellings will be completed within the envisaged timescales. In particular we fully support point (c) of paragraph 6.3 which states that Section 106 agreements will be drafted to provide for a periodic review of viability, with contributions staged to encourage development. Applicants should be able to demonstrate that they can deliver their permission within 5 years.</p>
9.16	Opinion	<p>The Council should be encouraged to enter into Service Level Agreements with applicants in the determination of applications and this same principle could be applied for implementation phases. Additionally, the issue of project/development viability and agreeing whether something is or isn't much earlier on would benefit all parties and provide surety and certainty. This is more about being realistic and employing best practice so that deliverability can be proven. The suggestion that S.94 Completion Notices are used is draconian and unreasonable. It is rare that applicants go to the cost nowadays of funding an application without making every attempt to see it implemented. This is a proposal that is not acceptable.</p>
9.17	Opinion	<p>The council's key issue with delivery of sites lies with the large brownfield sites in the borough. The council needs to address this through a flexible and realistic approach to planning contributions, including removing planning obligations where they are not reasonable or viable. Currently negotiations on such matters can take months if not years to progress. It is clear from the Government's recent announcements that they want to facilitate development on such sites by removing unviable obligations as promptly and as efficiently as possible.</p>
9.18	Opinion	<p>In order to address this it may be necessary for the Council to review Section 106 Agreements. During the course of the preparation of the SHLAA the Council should actively involve house builders in order to establish the size of sites that they are interested in developing and their preferred location. Such a process would be in accordance with advice set out in the NPPF.</p>

Ref No	Type	Comment
9.19	Opinion	Applying the guidance in the Framework should provide sufficient context for encouraging housing supply.
Question 10 – Do you agree with the proposed land release policies?		
10.1	Object	Disagree.
10.2	Support, in part	If there is no immediate prospect of land designated for employment being taken up then consideration should be given to housing particularly if it would contribute to the five year housing supply. A more flexible approach is required.
10.3	Support	Generally seems a common sense approach.
10.4	Support, in part	Support policy on employment land, other than in Winsford. Strongly support the use of brownfield land. Also support small scale developments on sustainable sites, where this doesn't undermine development of urban brownfield sites.
10.5	Support, in part	On condition that 'around' the towns is not used to allow development in green areas and corridors. The identity and character of a village community must be safeguarded by protecting and respecting its boundaries against encroachment.
10.6	Support	N/A
10.7	Support	In principle, we agree with the land release policies.
10.8	Support, in part	Reference to the particular Plans in which the policy boundaries to the four main towns are defined should be incorporated in any IHPPS. The term small scale is imprecise. The contribution that development on the edge of Northwich and Winsford can make towards the overall regeneration of these towns and their town centres, will be greater if appropriate and sustainable larger scale sites (for example, about 100 dwellings or more) are brought forward. Development adjacent to or within the Key Service Centres should not be confined to sites of less than 0.5 ha.
10.9	Object, but agree with some aspects.	Agree with some aspects, such as development in and around Key Service Centres, but this is still too restricted and the 0.5 hectares should be increased.
10.10	Support	Overall, support the policies in particular the emphasis on housing development being permitted within the existing 'policy' boundaries of Chester, Northwich, Winsford and Ellesmere Port. On permitting housing within allocated employment sites there is a need for some degree of caution so as not to see the significant loss of areas of employment land. Support the Council working proactively with developers to address site viability as an obstacle to development, and would fully endorse the approach of flexibility in the provision of Section 106 contributions where there are site viability issues.
10.11	Not specified	The Council should be looking to its development control team to bring forward allocated and safeguarded sites as quickly as possible to help reduce the housing land supply shortage.

Ref No	Type	Comment
10.12	Support	Agree that sites must be sustainable so the infrastructure and vitality of a village is not compromised.
10.13	Object	The suggested policy approach conflicts with recent decisions taken both by the Council and by the Inspectorate on appeal and looks highly unlikely to do anything to address the housing land shortfall, indeed, it would be likely to make the problem worse. The Council needs to recognise it has a serious problem and adopt a positive strategy to address this.
10.14	Support in part	Agree (b) in part. The policy should also allow redevelopment of such sites if they are no longer needed for employment uses. This is in accordance with the requirements of the NPPF to be flexible on employment allocations. (c) should read ' on the edge of all settlements ' instead of highlighting individual settlements. In addition, the reference to ' small scale ' should be deleted. If the borough does not have a deliverable 5 year supply of housing land (the position the proposed Interim Policy seeks to address) then all scales of development should be allowed, provided they are sustainable. Reference to ' they will not undermine the development of brownfield sites ' should also be removed, as the NPPF does not require a sequential approach to the selection of sites. Agree (e) in part but in the absence of 5 year housing land supply, greater flexibility should be shown as to the scale and location of development. Disagree with (g) as it is not a material consideration. The NPPF is clear that there should be flexibility and choice in the land market, and that this will necessitate granting planning permission for more housing land than is required for the 5 year supply in order to ensure that supply is actually delivered. Furthermore, some sites may have a disproportionate lead-in time before the first home can be completed as a consequence of site specific constraints such as remediation works or the provision of strategically important infrastructure. Agree (h) in part although would point out the NPPF requirements regarding when development plan policies are no longer a material consideration having regard to either their age, or the absence of an adequate supply of housing land.
10.15	Object	N/A
10.16	Support	Broadly speaking.
10.17	Support in part	Proposed changes: a) Housing development will be permitted within and on the edge of existing policy boundaries defined around Northwich, Winsford, Chester and Ellesmere Port; b) Housing development will be permitted on allocated employment sites within the policy boundary of Northwich, Winsford, Chester and Ellesmere Port; c) On the edge of Northwich and Winsford, housing developments on sustainable sites will be approved.
10.18	Support in part	c) Agree that sustainable sites on the edge of Northwich should be approved, without prejudice to equally sustainable brownfield sites, but should not be limited to "small scale". Each site to be treated on its merits.
10.19	Support, in part	Provided redrafted proposed land release Policies:

Ref No	Type	Comment
		<p>a) Housing development will be permitted within and around existing policy boundaries defined around Northwich, Winsford, Chester and Ellesmere Port;</p> <p>b) Housing development will be permitted within allocated employment sites within the policy boundary of Northwich, Winsford, Chester and Ellesmere Port;</p> <p>c) On the edge of Northwich and Winsford, housing developments on sustainable sites will be approved;</p>
10.20	Support, in part	<p>Redrafted version of the proposed land release Policies:</p> <p>a) Housing development will be permitted within and around existing policy boundaries defined around Northwich, Winsford, Chester and Ellesmere Port;</p>
10.21	Support, in part	<p>Propose revisions:</p> <p>a) Housing development will be permitted within and around existing policy boundaries defined around Northwich, Winsford, Chester and Ellesmere Port;</p> <p>b) Housing development will be permitted within allocated employment sites within the policy boundary of Northwich, Winsford, Chester and Ellesmere Port;</p> <p>c) On the edge of Northwich and Winsford, housing developments on sustainable sites will be approved;</p>
10.22	Object, in part	<p>Redraft proposed land release policies as below.</p> <p>a) Housing development will be permitted within and around existing policy boundaries defined around Northwich, Winsford, Chester and Ellesmere Port;</p> <p>b) Housing development will be permitted within allocated employment sites within the policy boundary of Northwich, Winsford, Chester and Ellesmere Port; and</p> <p>c) On the edge of Northwich and Winsford, housing developments on sustainable sites will be approved.</p> <p>In terms of e) object on the grounds that incremental housing development of sites under 0.5 hectares in the areas identified may not represent the most sustainable sites and may impact upon the delivery of necessary infrastructure. The policy should not restrict the size of development and should enable housing schemes to come forward which are larger than 0.5 hectares in area.</p>
10.23	Support, in part	<p>Redrafted version of the proposed land release Policies:</p> <p>a) Housing development will be permitted within and around existing policy boundaries defined around Northwich, Winsford, Chester and Ellesmere Port;</p> <p>b) Housing development will be permitted within allocated employment sites within the policy boundary of Northwich, Winsford, Chester and Ellesmere Port;</p> <p>c) On the edge of Northwich and Winsford, housing developments on sustainable sites will be approved;</p> <p>In addition, in light of our representations above we strongly urge the Council to remove criterion (f) from the draft</p>

Ref No	Type	Comment
		policy as this repeats national policy and is therefore unnecessary.
10.24	Support, in part	Redrafted version of the proposed land release policies below: a) Housing development will be permitted within and around existing policy boundaries defined around Northwich, Winsford, Chester and Ellesmere Port; b) Housing development will be permitted within allocated employment sites within the policy boundary of Northwich, Winsford, Chester and Ellesmere Port; c) On the edge of Northwich and Winsford, housing developments on sustainable sites will be approved;
10.25	Object	Do not support the inclusion of specific land release policies in an interim policy Statement as this should be left to the Local Plan. Where the proposed policies are directly aligned with the NPPF (for instance on the need for very special circumstances to be proven), they serve little purpose other than duplication. Where the proposed policies are more locally specific, they are seeking to introduce a policy basis which has not been tested through the proper process, i.e. through the Local Plan process. This will significantly limit the weight that can be attributed to them, thereby undermining the purpose and usefulness of the policies. Indeed, the final guideline (h) recognises the comparative lack of weight able to be afforded to the policies, noting that the Interim Policy would not over-ride policies as set out in development plans and national policy. This serves to highlight the ineffectiveness of establishing an Interim Policy position in advance of a Local Plan. On a final point of note, the Council provides no evidence as to the practical effects of implementing such policies. On what basis can the Council be certain that these policies will deliver against the requirements of the NPPF? Without such evidence, and a methodical, wholly inclusive approach to the preparation of such policy, the Council and all other parties cannot be clear that the strategy is appropriate and will deliver the scale of development that is needed.
10.26	Object	Points (a) and (b) need to be amended to include sites on the edge of the settlement boundaries of Chester, Northwich, Ellesmere Port and Winsford. Similarly, disagree with point c) which states that “on the edge of Northwich and Winsford, small scale housing developments on sustainable sites will approved provided that it is demonstrated that they will not undermine the development of urban brownfield sites”. Again, all applications should be determined on their own merits, and irrespective of size, if the current Local Plan is out of date, but a site offers a sustainable location for residential development, then an application should be approved without delay, as per the NPPF. Object to point (e), which states that housing development on sustainable sites of less than 0.5 hectares will be permitted in key service centres, on small infill and windfall sites, and in rural exception sites. Small scale, incremental development like this can in no way deliver the necessary infrastructure required in such areas. As such, this piecemeal method of development contradicts the IHPPS’s focus on “planned” manner. Agree with point (h).
10.27	Object	Do not consider such a policy or indeed an IHPPS is needed. It is a wholly negative policy that effectively seeks to

Ref No	Type	Comment
		<p>introduce a moratorium over new housing coming forward outside of the legitimate Local Plan policy process. It is flawed in so many other respects:</p> <ul style="list-style-type: none"> • It would impede sustainable development coming forward • It is in conflict with NPPF • It will be in conflict with the extant Local Plans and the emerging Local Plan • It is not based on any credible evidence base • It pre-empts any findings associated with an up-to-date Employment Land Study by encouraging the development of existing employment allocations for housing • It would be technically impossible to prove that edge of settlement greenfield sites in Northwich /Winsford would not undermine within settlement brownfield sites. Certain that consultation will unequivocally demonstrate that the development industry is against such a policy being introduced and would encourage Members to note such consultation responses rather than being tempted to reflect the minority wishes of the anti-development lobby groups. It is recognised that Members of the Authority can be nervous of many development proposals that seek to challenge the status quo, but would encourage Members to show mettle and place this policy aside. Encourage Members to truly embrace growth and speed up the plan making process, rather than being tempted into introducing yet another tier of obfuscation and delay. Authority might be cautioned against introducing this policy for it has not been through any Examination and if approved for development management purposes there is a significant risk that applicants will test it at appeal.
10.28	Object	<p>In respect of the policy for the release of sites to meet the shortfall, we consider that the IHPS is contrary to the NPPF. The NPPF is clear (paragraph 49) that where there a 5 year supply cannot be demonstrated, relevant policies for the supply of housing should not be considered up-to-date and the presumption in favour of sustainable development as set out in paragraph 14 of the NPPF is engaged. This means that housing development should be granted, unless the adverse impacts of doing so would significantly outweigh the benefits when assessed against the policies of the NPPF or where specific policies in the NPPF indicate development should be restricted. In short, the NPPF becomes the interim policy for Cheshire West. Consequently, even if the IHPS was part of the statutory development plan, which it is not, when the council is unable to demonstrate a 5-year supply of housing land, it would be considered out of date and the presumption in favour of sustainable development would be engaged across the borough and not just to the areas described in the IHPS. Therefore we question the need for the IHPS and the weight it can be given in decision making.</p>
10.29		<p>Option 'a' advises that housing development will be permitted within existing settlement boundaries around Northwich, Winsford, Chester and Ellesmere Port. Adopted policy already allows for such development, provided</p>

Ref No	Type	Comment
		<p>that it does not conflict with other policies in the local plan, but to date, this strategy has not been able to deliver the quantum of housing that is required. As such a continuation of this approach will have no real effect in addressing the Council's housing land supply shortfall. Option 'b' advises that housing development will be permitted within allocated employment sites in Northwich, Winsford, Chester and Ellesmere Port. This approach could lead to the loss of employment land and displace jobs from established employment areas. Consequently this would not work towards the Council's stated objective to encourage economic growth. In Winsford, where there is a need for economic regeneration, this approach could have significant adverse effects on regeneration. Option 'c' advises that on the edge of Northwich and Winsford, small scale housing developments on suitable sites will be approved, provided that it can be demonstrated that such provision will not undermine the development of urban brownfield sites. 'Small scale' housing development adjacent to settlement boundaries will not be sufficient to meet the pressing need for additional residential development. The Council should instead bring forward sites that are capable of delivering a significant quantum of housing in order to meet the pressing need for housing development against the policies in the NPPF. A similar criticism can be levelled at option 'e' that advises that sustainable sites of less than 0.5 hectare on size will be granted permission in the key service centres. In addition, small scale development outside of the key service centres could be delivered through small infill and windfall sites and rural exception sites. As it stands the Council does not have a 5 year housing land supply. That being the case the guidance in paragraph 49 of the NPPF applies and all policies which are relevant to the supply of housing land should be considered out of date. NPPF paragraph 14, therefore, defines the approach which the Council should adopt to the release of housing land. The land release policies in the IHPPS must be consistent with this guidance. Sustainable developments should be approved unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.</p>
10.30	Object	<p>This is the area in which we believe the IHPPS is most deficient. The proposed policies provide no greater source of housing supply than are currently being permitted under existing local plan policies and The Framework. The proposals in Paragraph 7.a are already permitted under existing Local Plan policies. Likewise Paragraph 7.b proposals are already permitted under existing Local Plan policies; recent examples include the Lostock Triangle site in Northwich. Paragraph 7.c proposals would already be allowed under Policy GS2 of the Vale Royal Local Plan. Paragraph 7.d proposals are already permitted under existing Local Plan policies and The Framework. The Council is already being flexible in terms of developer contributions. However, this may not necessarily represent a sustainable option as proposals that do not make their full and proper contribution to community, social and physical infrastructure and affordable housing fail to assist in building sustainable communities and will place undue burdens on public finance. Paragraph 7.e proposals are already permitted under existing Local Plan policies. The</p>

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		<p>policy will also have potentially adverse impacts on Council public/private sector development aspirations. Limiting sites to this size will not yield affordable housing as it is below the threshold in the relevant local plan policies. The rural areas of Cheshire West and Chester are the parts of the Borough where affordable housing problems are most acute. The document will therefore serve to exacerbate affordability issues. Therefore the IHPPS will not deliver any additional dwellings over and above existing policy. It will actually serve to prevent sustainable development opportunities and inhibit the delivery of affordable housing in areas of most need.</p>