



Our Ref: DIO SPA – Manchester/04C500394/RS/LS  
Your Ref: Issues and Options (Regulation 18) Consultation

29 August 2025

Planning Policy,  
Cheshire West and Chester Council,  
The Portal,  
Wellington Road,  
Ellesmere Port,  
CH65 0BA

Sent via email only: [planningpolicy@cheshirewestandchester.gov.uk](mailto:planningpolicy@cheshirewestandchester.gov.uk)

Dear Sir/Madam,

**Representations to the Cheshire West and Chester Local Plan Issues and Options Consultation (July – August 2025)**

Thank you for the opportunity to submit representations to the consultation on the Cheshire West and Chester Local Plan Review 'Issues and Options'. Avison Young has been instructed by our Clients, Defence Infrastructure Organisation ('DIO') who have land interests within the borough, in particular land at Dale Barracks, Chester (LAA Reference 1403). We understand that the Cheshire West and Chester Local Plan Review is at an early stage of preparation and that the Council is currently seeking views on strategic growth options and policy updates. These representations therefore provide comments on whether the planning and strategic policy directions identified within the consultation document are broadly correct, specifically in response to the following topics set out within the Issues and Options Regulation 18 Document (July 2025):

- Sustainable Development
- Spatial Strategy
- Chester

The remainder of these representation set out our comments on the various questions under the above heads and also provides an overview of our Clients site at Dale Barracks in response to the questions on Chester Growth Areas, demonstrating that it is a deliverable site for residential development.

It is noted that Avison Young reserve the right to provide further representations to future stages of the Local Plan, once further evidence base documents are prepared.

## Sustainable Development

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*Question SD1: Do you agree with the suggested policy approach towards sustainable development, as set out in SD 1 'Sustainable development' above? If not please suggest how it could be amended?*

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Overall, the DIO are supportive of draft Policy SD 1 (Sustainable Development) as it is reflective of national planning policy in regard to mitigating and adapting for climate change. It is however noted that it is important to ensure flexibility within the policy as not all forms of renewable energy or other climate changes measures are suitable on all sites. It is also important to ensure that the policy is not over onerous to ensure that development is still viable.

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*Question SD 2: Do you have any comments on how feasible district heat networks are? Should district heat networks be a requirement on strategic sites?*

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Policy SD 1 requires that all strategic sites should be connected to a district heat network. This policy should allow for flexibility, should this not be a feasible option for developers. The policy should be reworded as follows:

*“Strategic sites should be connected to a district heat network, where feasible and viable.”*

## Spatial Strategy

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*Question SS1: Is there any reason for the Council not to plan for delivering a minimum of 1,914 new homes each year?*

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Central to the NPPF is the need to create strategic policies which set out the overall strategy for the pattern, scale and design quality of places and to make sufficient provision for homes (including affordable housing). The DIO fully supports the approach to deliver a minimum of 1,914 new, high-quality homes across the borough, which would be in line with national planning policy and the new standard housing requirement for the borough.

There is clear justification to support the approach for the emerging Local Plan to meet its identified housing need, as failure to do so can result in harm, such as slower economic growth, a lack of labour force mobility, critical affordability issues, disruption to commuting patterns and the delivery of housing choice.

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*Question SS2: Do you think the Council should consider a stepped housing requirement that plans for a lower level of housing delivery earlier in the plan period?*

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It is our position that the Council should wait until they have undertaken a full housing land supply review and established the level of land available and potential delivery rates prior to considering if a stepped housing requirement can be justified. Notwithstanding this we would raise some concerns about the utilisation of a stepped housing approach, as there is a clear unmet housing needs in the Borough and an acute affordability issue, that needs to be addressed as early as possible in the plan period. As such we would propose that a stepped approach is not taken forward for the new Local Plan, to avoid any worsening of the current position.

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*Question SS4: Do you agree with the suggested policy approach towards the spatial strategy principles, as set out in SS 3 'Spatial strategy principles' above? If not please suggest how it could be amended?*

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The DIO fully supports the proposed Spatial Strategy approach which seeks to direct new development to previously developed land ('PDL') first, which is clearly in line with national planning policy. However it is noted that whilst the draft approach reference existing settlements first, this should be expanded to include all PDL within, adjacent or in close proximity to existing settlement boundaries.

With regards to urban extensions, the DIO supports the approach of development on sites on the edge of existing settlements in locations with good levels of access to transport, services and infrastructure, as these are considered the next best sustainable option for growth. In terms of larger scale strategic sites such as Dale Barracks, the site is considered to be a sustainable growth option, due to its location on the boundary of Chester settlement with good access to public transport, existing services and infrastructure; re-use of previously developed land; and the site is large enough to accommodate a cohesive and well-coordinated development.

This large strategic site is considered a preferred option to come forward, on par with various PDL within settlement boundaries which may be fragmented across the borough. With regards to releasing Green Belt land to provide opportunity for urban extensions to come forward, the DIO are wholly supportive of this and are seeking their land asset to be considered a residential-led allocation for housing and potentially other supporting uses.

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*Question SS5: Do you agree with the suggested policy approach towards the settlement hierarchy, as set out in SS 4 'Settlement hierarchy' above? If not please suggest how it could be amended?*

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Policy SS 4 (Settlement Hierarchy) states that Chester (city) is the highest-ranking settlement on the settlement hierarchy, based on its status and role in providing local infrastructure and services

its local population. As such, it is the DIO's position that large scale strategic development should be focussed on the largest settlement and surrounding areas adjacent to this settlement boundary. The policy states that an individual place-based policy for each settlement will set out the vision, core features, key issues and clear strategy for what development will take place in each settlement. The DIO would support a policy which focusses on supporting development with a preference of accommodating this in the largest settlements first. Within the new policy for Chester, there should be reference to the DIO's land interest (Dale Barracks) and the ambition to eventually repurpose the site for a residential-led development which would see the provision of new homes, with the opportunity to provide care homes, public open space, local centre, landscaping and active transport routes.

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*Question SS9: Have circumstances changed since the adoption of the Local Plan (Part One), that would now justify Green Belt release?*

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It is our position that there is a clear and justified need to consider Green Belt release as part of the new Emerging Local Plan. The current Local Plan (Part One) sought to deliver the borough objectively assessment need, which was calculated as 1,100 homes per year at the time of adoption, however it is noted that the new housing targets released in December 2024, now set a minimum figure of 1,914 new homes a year, which is a significant increase. Whilst further evidence will be provided to underpinned the new Local Plan, it is clear from the council's own initial assessment (Land Availability Assessment Stage One, 2025 Update) that there is a significant shortfall of housing land that is available within the existing urban area to meet the proposed housing target and as such exceptional circumstances do exist for the release of Green Belt land.

The emerging Local Plan must consider the implications and the harm that will occur from failing to meet identified needs in the Borough, such as slower economic growth, a lack of labour force mobility, critical affordability issues, disruption to commuting patterns and the delivery of housing choice.

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*Question SS14: Do you feel that Option A is an appropriate spatial strategy for the new Local Plan?*

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For the reasons previous set out under our response to Question SS9, it is our position that Option A is not an appropriate spatial strategy. It is clear from the council's own initial assessment (Land Availability Assessment Stage One, 2025 Update) that there is a significant shortfall of housing land that is available within the existing urban area to meet the proposed housing target. As such it appears from the evidence presented to date that it would not be possible to meet the identified housing needs in the Borough under Option A, which would have significant impacts and harm including, slower economic growth, a lack of labour force mobility, critical affordability issues, disruption to commuting patterns and the delivery of housing choice.

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*Question SS15: If you do not feel that Option A is an appropriate spatial strategy option, are there any changes that you could suggest?*

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For the reasons given in response to Question SS9 and SS14 it is our position that there aren't any changes to Option A that could be made to ensure that it would be an effective or justified approach.

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*Question SS16: Do you feel that Option B is an appropriate spatial strategy for the new Local Plan?*

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Based on the evidence available to date, it appears that Option B could be an appropriate strategy for the new Local Plan as it ensures that the plan meets the new standard housing requirement figures and focusses development in the most sustainable locations in and on the edge of main urban areas and smaller settlements which have adequate services and facilitates which clearly accords with national policy and has already been established as a sound spatial strategy under the current Local Plan.

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*Question SS18: Do you feel that Option C is an appropriate spatial strategy for the new Local Plan?*

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Based on the evidence available to date, it appears that Option C could also be an appropriate strategy for the new Local Plan as it ensures that the plan meets the new standard housing requirement figures and focus development within sustainable transport corridors and PDL sites which also accords with national policy.

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*Question SS23: Which of the identified potential growth areas around Chester do you consider to be the most suitable?*

*Question SS 24: Do you have any further comments about any of the potential growth areas identified around Chester?*

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Our response to Question SS23 and SS24 relates to the DIO's land interest at Dale Barracks which falls within the proposed growth allocation CH01. The DIO are fully supportive of the potential removal of the site from the Green Belt and allocation as part of a wider allocation under CH01.

Policy GBC1.C of the Cheshire West and Chester Council Local Plan (Part Two) currently identifies most of Dale Barracks as a development opportunity. The whole site represents a highly sustainable location that offers an opportunity for sensitive land release from the Green Belt and

allocation for housing development on a PDL site. The DIO and their technical team have prepared a Development Statement for the site (enclosed with theses representations), which seeks to clearly articulate the opportunity that exists at the site for release from the Green Belt and allocation for residential development, by providing; an analysis of the site and its surroundings; setting out the case for the removal of the site from the Green Belt; analysing the sustainability of the site, including a review of key technical considerations and demonstrating that the site is suitable, available and achievable.

On the basis of the information contained within the Development Statement, it is the DIO position that growth area CH01 is the most suitable growth area for Chester.

## **Chester**

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*Question CH1: Do you agree with the suggested policy approach towards Chester, as set out in CH 1 'Chester' above? If not please suggest how it could be amended?*

*Question CH2: Do you have any comments on the suggested allocations/sites, set out above?*

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CH1 sets out the overall vision for Chester and its function as a city centre, which is generally supported by the DIO. However, with reference to Dale Barracks, it is noted that the DIO have confirmed that it will become surplus to requirements by 2030 and as such, it is our position that the draft approach to Policy CH1 should be amended to ensure that the site is identified for removal from the Green Belt and reallocated for residential led development. As set out in our response to Question SS23, the site is located in a highly sustainable location and is a deliverable site to deliver much needed housing on a PDL site. Whilst it is noted that Dale Barracks is one of several sites identified within the Upton Triangle (CH01), for delivery purposes, it would be necessary for the site to have its own policy allocation.

## **Summary**

In summary it is the DIO position that the Council should proceed with either Option B or Option C, as the most suitable growth options over the course of the Local Plan period, as these options will ensure that an effective and justified level of development is delivered for the Borough.

With reference to the DIO land interests at Dale barracks, it is clear, as demonstrated by the enclosed Development Statement, that the site represents an opportunity for the Council to allocate a site for development, which would contribute positively towards meeting housing targets across the Borough, in a sensitive manner that would have limited impacts to the purposes of the Green Belt, whilst making the most effective use of PDL.

The site demonstrates a sustainable, deliverable, and available option for a residential-led strategic development, which could be delivered in a co-ordinated fashion, whilst also delivering social, environmental and economic benefits including but not limited to:

- Creation of jobs during the construction phase of any subsequent development on site;
- Creation of a number of other off-site employment opportunities in the building trade ranging from suppliers of building materials to architects;
- An increase in expenditure in the local economy through both construction workers and from new residents will help to support Chester and surrounding businesses;
- Delivery of a range and type of housing to meet local needs, including affordable housing and where market demands indicate specialist housing to be suitable;
- Provision of public open space throughout the site for the benefit of existing and future residents;
- Delivery of a sustainable, co-ordinated development which will have good access to jobs, shops, services and transport links;
- Delivery of a scheme which ensures efficient use of land by maximising its development whilst taking into account key site opportunities and constraints, delivering a viable scheme; and,
- Following a full technical review, not result in any significant adverse/unacceptable environmental impacts such as flood risk, land contamination, ecology, heritage and landscape.

The DIO welcomes the opportunity to work collaboratively with the Council and other key stakeholders as the Local Plan progresses and would welcome an ongoing dialogue about the site prospects and contribution it can make to meeting future development needs in the Borough.

These representations have highlighted a number of key issues that need to be considered during the production of the Cheshire and West and Chester Local Plan Review, to ensure that the Local Plan meets the test of soundness. We would be grateful if you could confirm safe receipt of this letter, and we respectfully request that these representations are considered by the Council in the preparation of the Cheshire West and Chester Local Plan Review.

Should you require further information or wish to discuss these matters further, please do not hesitate to contact me.

Yours sincerely



**Rhian Smith**  
**Director**



**For and on behalf of Avison Young (UK) Limited**