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Kingfisher Business Centre
Burnley Road
Rossendale
Lancashire
BB4 8EQ

Planning Policy Team

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

E | info@connollysgroup.com

By email only: planningpolicy@cheshirewestandchester.gov.uk

Dear Sir/Madam,

**CHESHIRE WEST & CHESTER LOCAL PLAN ISSUES & OPTIONS (REGULATION 18) CONSULTATION
REPRESENTATIONS ON BEHALF OF ERIC WRIGHT GROUP
LAND AT LLOYD DRIVE, ELLESMERE PORT**

Connollys acts on behalf of the Eric Wright Group in respect of their landholding at Lloyd Drive, Ellesmere Port. We are now instructed and welcome the opportunity to submit representations to the Council's Issues & Options (Regulation 18) consultation. The site has already been positively discussed with officers, and a draft site-specific policy (May 2025) was prepared at the Council's request, which is now submitted as part of these representations for formal consideration. The subject site is shown below outline in red.



Land at Lloyd Drive, Ellesmere Port

Our comments and representations to the Regulation 18 Consultation document are now set out below.

Strategic Policy Context

The Issues & Options consultation recognises that Cheshire West must plan for a significant uplift in growth:

- Housing: 1,914 dwellings per annum (28,710 dwellings over 15 years), derived from the Standard Method (NPPF, Dec 2024).
- Employment: 198 hectares over 20 years (149 hectares over the plan period), as identified in the Economic Needs Assessment (2025).

This scale of provision represents a step change compared with the adopted Local Plan. Meeting these requirements necessitates a proactive strategy that prioritises urban brownfield regeneration, whilst also acknowledging the need for strategic extensions where justified by exceptional circumstances.

National policy emphasises that plans should:

- Meet development needs in full (NPPF para. 11);
- Make effective use of land, giving priority to previously developed sites (para. 119);
- Support a positive strategy for economic growth (para. 86).

Role of Ellesmere Port

Ellesmere Port is correctly identified as a “main town” within the settlement hierarchy (SS4). Its advantages are clear:

- Excellent strategic accessibility (M53, A5117, rail connections, proximity to Merseyside and Chester);
- A well-established economic base (Stanlow, Protos, Origin and related clusters);
- Significant capacity for regeneration through brownfield and underutilised land.

Directing growth to Ellesmere Port represents the most sustainable means of accommodating the borough’s needs. It makes best use of existing infrastructure and services and maximises the potential for linked regeneration and investment.

Land at Lloyd Drive

Our client’s landholding at Lloyd Drive comprises:

- A series of ageing office buildings (now outdated and increasingly costly to maintain);
- An undeveloped parcel with an active care home proposal;
- Surroundings that include residential to the west, commercial and retail to the north and east, and the A5117 corridor to the south.

The site has the following attributes:

- Highly sustainable – within the built-up area, close to services, retail, and employment.
- Previously developed – contributing to urban regeneration.

- Versatile – capable of accommodating a broad mix of uses as set out in our draft policy: Class E employment and service uses, complementary retail, care and residential uses, and community/leisure facilities.
- Deliverable – no overriding constraints, and supported by a developer with the capacity to invest.

Redevelopment of Lloyd Drive offers:

- Replacement of declining office stock with modern, efficient, and sustainable buildings;
- Potential for new housing supply, including specialist accommodation and a natural residential extension adjoining Shetland Drive;
- A continued employment role, aligned with evidence of need for flexible employment land;
- Tangible regeneration benefits, supporting Ellesmere Port’s economic and social role.

In short, Lloyd Drive is a model “brownfield-first” site: central to Ellesmere Port’s future growth and highly consistent with national policy.

Growth Options and Potential Growth Areas

We note the three options presented at Section SS5:

- Option A – Retain the Green Belt: This Option cannot meet the identified scale of growth and cannot be supported.
- Option B – Current distribution: Most realistic Option.
- Option C – Sustainable transport corridors: Attractive in principle, but risks dispersed and incremental growth with limited regeneration benefit.

With reference to the potential growth areas for Ellesmere port, EP01 is the most appropriate and ambitious strategy to meet identified development needs. It is incredibly likely that exceptional circumstances for Green Belt release at Ellesmere Port will exist, given the step change, to support urban brownfield opportunities such as Lloyd Drive, which would be complimentary for any policy framework that may be devised for EP01 in future version of the Local Plan. We would welcome Officers’ formal consideration of our proposed site specific policy, which is enclosed with this letter for consideration.

Conversely, EP04 is the least appropriate option, being less sustainable, more dispersed, and inconsistent with national policy emphasis on regeneration.

Response to Consultation Questions

Q SS1: The Council must plan for the full Standard Method requirement (1,914 homes p.a.).

Q SS4: Support the spatial strategy principles, especially prioritising previously developed land. Lloyd Drive exemplifies this approach.

Q SS5/6: Support Ellesmere Port’s role as a main town. Request a stand-alone allocation and policy for Lloyd Drive, ensuring certainty and deliverability.

Q SS9–12: Exceptional circumstances exist for Green Belt release. Our client’s support Growth Area EP01 and oppose EP04.

Conclusion

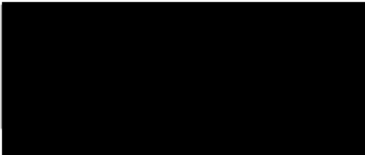
Cheshire West faces a major growth challenge. To be found sound, the new Local Plan must be positively prepared, justified, effective, and consistent with national policy. This requires:

- Ambitious growth at Ellesmere Port;
- Brownfield site regeneration along with Green Belt release to meet identified development needs;
- Clear identification of deliverable sites such as Lloyd Drive.

Our client respectfully requests that the Land at Lloyd Drive be expressly allocated in the new Local Plan, either as part of Growth Area EP01 or preferably via a stand-alone mixed-use policy, consistent with the enclosed draft (May 2025).

We would be pleased to continue dialogue with officers and to support the refinement of the policy as the plan progresses.

Yours sincerely,



Daniel Connolly
Managing Director
Connollys Planning & Development Ltd

Enc.

Summary of Responses to Consultation Questions

Proposed Draft Policy for Lloyd Drive

Appendix – Summary of Responses to Consultation Questions

Consultation Question	Response on behalf of Eric Wright Group
SS1 – Housing requirement (1,914 homes p.a.)	Support full requirement in line with NPPF. Agree with brownfield urban regeneration approach (e.g., Lloyd Drive) but consider that exceptional circumstances exist for Green Belt release to accommodate identified needs.
SS4 – Spatial strategy principles	Agree. Support the focus on previously developed land. Lloyd Drive is a sustainable urban brownfield site that exemplifies this principle.
SS5/SS6 – Settlement hierarchy	Support Ellesmere Port as a main town. Request stand-alone allocation/policy for Lloyd Drive to ensure clarity and deliverability.
SS9 – Exceptional circumstances for Green Belt release	Yes, justified by the scale of housing and employment need.
SS10–12 – Spatial strategy options	Support EP01 (ambitious growth at Ellesmere Port) which would complement and encourage the regeneration of sites such as Lloyd Drive. Oppose EP04 as it disperses growth unsustainably, undermining regeneration and accessibility.

Site-Specific Local Plan Policy: Land at Lloyd Drive, Ellesmere Port

Background

The Land at Lloyd Drive, Ellesmere Port, is situated in a highly accessible and sustainable location, benefiting from excellent public transport links and proximity to major road networks. The site is surrounded by a diverse range of existing uses, including established commercial premises, residential areas, and retail facilities. This strategic position presents a significant opportunity to broaden the range of uses on the site, fostering a more vibrant, mixed-use environment that complements the existing character of the area and maximizes the benefits of its sustainable location.

Policy LP[XX]: Land at Lloyd Drive, Ellesmere Port – Mixed-Use Development

1. **Scope:** This policy applies to the Land at Lloyd Drive, Ellesmere Port, as identified on the Policies Map.
2. **Principle of Development:** Development on the Land at Lloyd Drive will be supported for a range of uses, subject to the criteria set out below and where it delivers a high-quality scheme that contributes to the sustainable development of the site and wider area.
3. **Permitted Uses:** Planning permission will be granted for developments that include a diverse range of uses, specifically encompassing:
 - **Class E Uses:** This includes, but is not limited to, commercial, business and service uses, such as offices, research and development, light industrial processes (compatible with a mixed-use environment), clinics, health centres, nurseries, day centres, and indoor sports, recreation or fitness uses.
 - **Complimentary Retail:** Small-scale retail units (Class E) that are genuinely complementary to the primary uses on the site and serve the day-to-day needs of occupiers and visitors will be permitted. This may include convenience stores, cafes, and other ancillary retail provision, provided it does not undermine the vitality and viability of established town centres.
 - **Complimentary Residential Uses (Class C2 & C3):** Residential development will be permitted where it does not undermine the primary employment function of the site, contributing to a balanced and sustainable community. The scale and density of residential development should be appropriate to the site's context and provide a mix of housing types where feasible.
 - **Other Commercial Uses (Sui Generis):** Consideration will be given to other commercial uses, including leisure and community facilities, where it can be demonstrated that they are compatible with the surrounding environment, do not generate unacceptable impacts, and contribute positively to the overall mixed-use character of the site and wider area.
4. **Design and Amenity:** All development proposals must demonstrate high-quality design that responds positively to the site's context and character. Proposals should incorporate:
 - An appropriate urban form and building heights that respect the local area.
 - High-quality public realm, including well-designed open spaces, landscaping, and pedestrian and cycle friendly routes, integrating the site with the surrounding area.
 - Measures to ensure good levels of amenity for future occupants and neighbouring properties, addressing issues such as noise, light, and privacy.

- Sustainable design and construction principles, including energy efficiency, water conservation, and sustainable drainage systems.
5. **Accessibility and Movement:** Development proposals must prioritize sustainable modes of transport and ensure excellent connectivity. This includes:
- Providing safe and convenient pedestrian and cycling links to existing facilities and public transport nodes.
 - Maximizing opportunities for public transport use.
 - Adequate and appropriately located vehicle parking, including provision for electric vehicle charging.
 - A robust Transport Assessment that demonstrates how the development will manage travel demand and mitigate any impacts on the local highway network.
6. **Infrastructure:** Development will be required to demonstrate that necessary infrastructure, including utilities, drainage, and community facilities, can be provided without detriment to existing services or the environment.

Reasoning: This policy aims to capitalize on the highly accessible and sustainable nature of the Land at Lloyd Drive. By allowing a broad range of Class E uses, alongside complementary retail, residential, and other appropriate commercial uses, the policy seeks to create a vibrant, resilient, and attractive mixed-use environment. This will reduce the need to travel, support local services, enhance the quality of life for residents and workers, and contribute to the economic prosperity of Ellesmere Port, consistent with the principles of sustainable development. The policy also ensures that any development is of high quality, well-integrated with its surroundings, and supported by appropriate infrastructure.