



Cheshire West and Chester Council Local Plan  
Issues and Options (Regulation 18) Consultation 2025  
Church Commissioners for England  
August 2025

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# 1. Introduction

- 1.1.1. Deloitte LLP is instructed by the Church Commissioners for England (“the Commissioners”) to submit representations to the Cheshire West and Chester Local Plan – Issues and Options (Regulation 18) Consultation (“the Consultation”), which is the subject of public consultation until 29<sup>th</sup> August 2025.
- 1.1.2. The Consultation marks the first formal stage in producing a new Local Plan, in line with the Local Planning Regulations 2012 (as amended), and is seeking views on whether the right issues have been identified and which options are the best for addressing them.
- 1.1.3. The Commissioners welcomes the preparation of the new Local Plan for Cheshire West and Chester Council (“the Council” or “CWCC”). The Cheshire West and Chester Local Plan provides an opportunity to help shape the future of the authority over the plan period and deliver much-needed housing and economic growth across the borough.
- 1.1.4. The Commissioners believes their extensive landholdings, extending to approximately 256.6ha, in the borough, known as ‘Land south of Ellesmere Port’ (referred to hereafter as ‘the Site’), offer significant potential for sustainable development, which provides an excellent opportunity to positively contribute to the borough’s overall needs. This Site is readily available to be delivered within the plan period. The Commissioners would welcome continued early engagement and discussions with the Council to explore the opportunities presented by the Site.

## 1.2. The Church Commissioners for England

- 1.2.1. The Commissioners is a registered charity, established in 1948 to manage the Church of England’s historic assets, and is responsible for providing financial support for the work and mission of the Church of England across the country. This is achieved through the responsible and ethical management of the Church’s permanent endowment fund, a diverse investment portfolio which enables the Commissioners to provide financial support for the Church, by helping to ensure funding is intentionally used for mission and growth. The Church’s historic land holding is held by the Commissioners as part of this investment portfolio and equates to c. 80,000 acres of land across England, a proportion of which already has significant identified development potential.
- 1.2.2. The Commissioners brings forward land for strategic-scale development with the aim of delivering new homes and employment opportunities that support and enhance local surroundings. It does this by seeking to build new, and strengthen existing, communities helping to create and sustain vibrant places. The importance of high-quality placemaking and thorough engagement with local authorities, existing communities and local churches and dioceses is at the heart of what it does.
- 1.2.3. The Commissioners therefore has considerable interest in the preparation of the Cheshire West and Chester Local Plan and how it can play an integral part in the delivery of much needed housing across the authority.

## 1.3. Background

- 1.3.1. This representation has been prepared having regard for the Commissioners’ landholdings known as ‘Land south of Ellesmere Port’.
- 1.3.2. In the context of the above, the following Site was submitted to CWCC as part of the Call for Sites exercise within the Land Availability Assessment – Stage One Consultation (2024), as a unique, mixed-use development to provide a new sustainable community to the south of the Ellsemere Port.

- 1.3.3. The Commissioners historically promoted the Site through the previous Local Plan process, with a Vision Document being prepared to support the promotion of the Site (as prepared by Corstophine and Wright (August 2021)). In addition to this, the Commissioners engaged with various stages of the previous Local Plan process through providing representations to relevant consultations.
- 1.3.4. Since the conclusion of the previous Local Plan process, the Commissioners has continued engagement with stakeholders in the region including Planning, Regeneration and Energy and Decarbonisation Officers at CWCC, McArthur Glen (Cheshire Oaks Designer Outlet), United Utilities, Stanlow and Hynet as well as Cheshire Wildlife Trust and the Canal and Rivers Trust in order to ensure the future promotion of the Site supports the future strategic aspirations of both Ellesmere Port, and Cheshire West and Chester more widely.
- 1.3.5. The representation will be submitted via email to CWCC alongside a Vision Document as prepared by JTP, titled 'Land at Little Stanney Lane, Ellesmere Port' (January 2025). This Vision Document builds on earlier visioning work submitted in 2024 to demonstrate a developed and considered approach to the unique opportunity the Site provides for a large scale, mixed-use development.
- 1.3.6. Alongside the Vision Document, the following documents are submitted to support this consultation response, these are:
- Land at Little Stanney Lane, Ellesmere Port – Green Belt Review Technical Note (August 2025);
  - Land at Little Stanney Lane, Ellesmere Port – Landscape Technical Note (August 2025);
  - Ellesmere Port I&O Submission – Transport Technical Note (August 2025); and
  - Solar Capacity Concept Plan (July 2025).

## 1.4. Context of Representation

- 1.4.1. In preparing this representation, consideration has been had for the CWCC Local Plan Regulation 18 'Issues and Options' Document ("the Consultation Document" or "the draft Local Plan") (July 2025), as well as a suite of Evidence Base documents as listed within the Consultation Document, the Sustainability Appraisal and latest CWCC Annual Monitoring Report.
- 1.4.2. This representation has also been framed against the National Planning Policy Framework (December 2024) ("NPPF") and supporting Planning Policy Guidance ("PPG") with which the Local Plan should be consistent.

## 1.5. Structure of Representation

- 1.5.1. This document provides a response to the following questions within the Consultation Document, as below:
- Local Plan Vision;
  - Local Plan Objectives;
  - Sustainable Development;
  - Spatial Strategy;
  - Ellesmere Port;
  - Green Belt and Countryside;
  - Transport and Accessibility;
  - Economic Growth, employment and enterprise;
  - Visitor Economy;
  - Housing;
  - Health and Wellbeing;

- Open Space, Sport, Recreation and Community Facilities;
- Landscape;
- Green Infrastructure, Biodiversity and Geodiversity;
- Energy; and
- Miscellaneous.

1.5.2. Concluding comments are provided at the end of the document.

## 2. Executive Summary

2.1.1. This representation is submitted in support of the Commissioners' 256.6ha Site ('Land south of Ellesmere Port') with regards for its potential for sustainable development within Cheshire West and Chester.

2.1.2. The Commissioners advocates for the Site's **complete allocation** within the Local Plan, and has provided justification for its necessary removal from the Green Belt. This approach, is justified by several factors which are detailed within this representation to the Cheshire West and Chester Local Plan – Issues and Options (Regulation 18) Consultation.

### 2.2. Plan Period, Housing Need & Spatial Strategy

2.2.1. The Commissioners advocates for a 20-year plan period to ensure sufficient flexibility and alignment with national policy. The Commissioners strongly supports a minimum annual housing target of 1,914 homes aligning with the standard method figure, but encourages CWCC to be aspirational when considering the delivery of housing, given that CWCC have continuously delivered a surplus in housing delivery compared with the housing target of the current Local Plan.

2.2.2. The Commissioners proposes that the Local Plan spatial strategy should prioritise large-scale, mixed-use developments such as 'Land South of Ellesmere Port', located near established settlements, to maximize infrastructure benefits and sustainable community creation.

2.2.3. Additionally, undeveloped planning permissions and undelivered local plan allocations should be reassessed for deliverability before being re-included within the emerging Local Plan.

### 2.3. Green Belt Release

2.3.1. The Commissioners contends that circumstances have significantly changed since the adoption of the previous Local Plan, primarily due to the increased housing need.

2.3.2. Furthermore, the Green Belt designation of 'Land South of Ellesmere Port' is outdated, given its detachment from the wider North Chester Green Belt caused by existing infrastructure (M53 and M56 motorways) which now limits its contribution to the Green Belt's intended purposes.

2.3.3. The Commissioners asserts that removing the Site from the Green Belt would not negatively impact the separation of Ellesmere Port and Chester. Furthermore, if required, the development could align with the "Golden Rules" for Green Belt release, offering affordable housing, infrastructure improvements, and enhanced green spaces.

### 2.4. Economic Growth & Ellesmere Port

2.4.1. The Commissioners highlights Ellesmere Port's potential for economic growth, particularly in the low-carbon energy sector. As such, the Commissioners advocates for the allocation of their Site to support this growth, providing co-located housing and employment opportunities, alongside the provision of solar energy development. The Site's strategic location and single-ownership status offers advantages for comprehensive masterplanning and timely delivery.

### 2.5. Environmental Considerations

2.5.1. The Commissioners' proposal incorporates significant green infrastructure, biodiversity enhancements, and nature recovery initiatives, which, if delivered in its totality, would exceed the 10% mandatory biodiversity net gain. The Commissioners emphasises the Site's potential to create a new nature recovery network, linking existing green spaces and supporting CWCC's climate change ambitions.

### 2.6. Conclusion

- 2.6.1. The Commissioners' representation strongly urges CWCC to consider the complete allocation of their Site, 'Land south of Ellesmere Port', and advocates for its removal from the Green Belt in order to unlock its full potential for sustainable development.
- 2.6.2. Development of the Site would assist in meeting the borough's housing and economic needs whilst significantly contributing to environmental improvements and the achievement of CWCC's climate change ambitions.

## 3. Evidence and Plan Period

IN 1 - Do you agree that this is the right evidence that we need to inform the new Local Plan? Is there further evidence that you think will be required?

- 3.1.1. The Commissioners recommends that a robust evidence base be prepared to support and inform the emerging Local Plan, with evidence provided to support strategic policies for housing, employment and low carbon energy provision specifically.
- 3.1.2. The Consultation Document signposts to the evidence base documents prepared to date, to support the emerging Local Plan, include the Employment Areas Survey, Economic Needs Assessment, Playing Pitch Strategy, Peatlands of Cheshire West and Chester, Places Background Papers, Land Availability Assessment, Brownfield Land Register, Waste Needs Assessments and Local Aggregate Assessments.
- 3.1.3. Additionally, it is noted that the following additional evidence is needed to support the new Local Plan:
- Retail and Town Centres Study (in preparation)
  - Strategic Flood Risk Assessment (in preparation)
  - Gypsy Traveller Accommodation Assessment (GTAA) (in preparation)
  - Housing Needs Assessment (to be prepared)
  - Green Belt Study (to be prepared)
  - Infrastructure Delivery Plan (to be prepared)
  - Strategic Viability Assessment (to be prepared)
  - Transport Assessment (to be prepared)
  - Land Availability Assessment (in preparation).
- 3.1.4. The Commissioners notes that the aforementioned list is not consistent with that referenced within Paragraph 3.1 of the Sustainability Appraisal, and therefore suggest that a comprehensive list encompassing all evidence base documents is provided across both the Sustainability Appraisal (2025) and draft Local Plan consistently, to ensure that this can be appropriately reviewed and considered.
- 3.1.5. The Commissioners is particularly supportive of the preparation of a Green Belt Study, which should be utilised to inform whether *“exceptional circumstances exist [justifying to the removal of land from the Green Belt] and if so, which parts of the Green Belt need to be reviewed and amended”* as noted within the Sustainability Appraisal. Given the significant increase in the standard method figure of 1914 homes per annum which CWCC should be planning for through this Local Plan, the Green Belt Study is key in ensuring that the Local Plan can evidence and successfully deliver growth across the borough.
- 3.1.6. It is important that these documents are completed to inform the next consultation stage of the Local Plan process, particularly in relation to the overall growth options and subsequent allocations that will underpin these within the Local Plan, and therefore it would be helpful if CWCC could provide a timeframe for when these will be provided.

### IN 3 - Do you have any comments or views on the proposed plan period for the new Local Plan?

- 3.1.7. The CWCC Local Development Scheme (2025) ('LDS') sets out the anticipated adoption of the new Local Plan in Summer/Autumn 2027. As noted within the LDS, *"further changes to the national planning system represent a high risk that could introduce some uncertainty and delay"*.
- 3.1.8. Although the Commissioners is supportive of the general development of the new Local Plan, given national policy and legislative uncertainties, it is considered that a period of 15 years would not provide adequate flexibility if delays to adoption of the Local Plan were to happen.
- 3.1.9. Additionally, the NPPF states in Paragraph 22 that *"strategic policies should look ahead over a minimum 15 year period from adoption"*, and where larger-scale development such as new settlements or significant extensions are proposed within the Local Plan *"policies should be set with a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery"*.
- 3.1.10. The Commissioners is supportive of the inclusion in principle of larger-scale developments, such as urban extensions, within the Local Plan particularly given the significantly increased standard method figure of 1914 homes per annum that CWCC should be planning for. However, the Commissioners considers that a period of 15 years does not adequately allow for policies to be positively prepared with consideration of the timescales for delivery of such developments.
- 3.1.11. The Commissioners therefore suggests that the Plan period for the new Local Plan go above the *"minimum"* period as noted within the NPPF, and should reflect that of the currently adopted CWCC Local Plan, covering a period of 20 years.

## 4. Local Plan Vision

VI 1 - Do you agree with the suggested approach towards the new Local Plan vision, as set out in VI 1 'Vision' above? If not please suggest how it could be amended?

- 4.1.1. The Commissioners is supportive of the approach towards the new Local Plan vision which aims to ensure that *“Cheshire West and Chester is to be a desirable and attractive place to live, work, learn and visit with vibrant towns and villages, by meeting our development needs in sustainable locations”*. The Commissioners particularly supports the need to meet development needs in sustainable locations from the outset, and suggests that the Vision go further, and contain clear aspirations to achieve ambitious levels of growth over the new Plan period.
- 4.1.2. The Commissioners considers that the Local Plan Vision should be distinctive to Cheshire West and Chester in order to successfully provide the mechanisms and policies needed to ensure that all areas of the borough are able to *“grow and evolve”*, contributing positively to the ambitions of other CWCC documents such as the Plan for the Borough (2024-2028) and the Cheshire West and Chester Climate Emergency Response Plan (2020).
- 4.1.3. The Commissioners recognises that responding successfully to the Climate Emergency is a priority for the Council, particularly noting the significant aspirations detailed within the Cheshire West and Chester Climate Emergency Response Plan (2020) and Local Action Plans (2022). These need to be progressed across this Local Plan period in order to achieve the Council’s ambition to become a carbon negative borough by 2045. The Commissioners therefore stresses the important role that the Local Plan can play in this, and considers that alignment to the climate change ambitions should be referenced within the Vision.

VI 2 - Should the vision include/establish a set of principles and priorities? Are these the right ones – do you have any other suggestions?

- 4.1.4. The Commissioners is supportive of establishing a set of principles and priorities within the Local Plan Vision, and are supportive of the four current established principles as drafted. However, the Commissioners considers that the Vision principles should include a fifth statement, directly addressing the need to achieve ambitious levels of growth over the new Local Plan period in order to supports its housing and economic needs.
- 4.1.5. Cheshire West and Chester has a significant housing need figure of 1,914 homes per annum demonstrated through the December 2024 standard method. CWCC note that a key issue for the borough will be *“meeting national policy obligations while maintaining the special character of Cheshire West and Chester”* in light of the level of housing development required by the government.
- 4.1.6. Aspiring to these levels of growth will also attract increased inward investment, as well as satisfying the aims of the distribution of both housing and employment growth. In doing so, the Vision and Objectives will be *“prepared positively, in a way that is aspirational but deliverable”* in line with NPPF Paragraph 16b. Stating this from the outset will create a clear growth aspiration for the Local Plan, which will then subsequently be supported through strategic policies and allocations.

VI 3 - Do you agree with the approach of establishing concise visions for the key places identified in the new Local Plan? Or do you have an alternative suggestion?

- 4.1.7. The Commissioners is supportive of the approach to establish concise visions for the key places identified in the new Local Plan, notably Ellesmere Port. Aligning with the Ellesmere Port Places Background Paper, the Commissioners considers that the vision should centre around capitalising

on the settlement's role as a *“major employment land resource for the borough”* that has *“become increasingly successful in attracting new employment opportunities”*, particularly in relation to providing new co-located housing, employment and low carbon energy development.

- 4.1.8. The Commissioners stresses the importance of considering housing and economic development aspirations and strategy for growth holistically, in order to deliver sustainable development and communities across the borough. This is a consideration that should be referenced within the vision for Ellesmere Port, cognisant of its current unique makeup as a town in proximity to significant employment provision and emerging opportunities.
- 4.1.9. The Commissioners considers that these visions should ensure alignment with the overarching vision of the Local Plan, to avoid diluting the aspirations of the Local Plan and ensure the successful delivery of much needed sustainable growth across the borough.

# 5. Local Plan Objectives

OB 1 - Please select the option which is the most appropriate approach for the new Local Plan:

- a. Option A – Take forward current Local Plan Objectives
- b. Option B – Use the Sustainability Appraisal Objectives
- c. Neither of these

- 5.1.1. The Commissioners considers that Option C is most appropriate. Paragraph 3.1 and 3.2 of the Consultation Document note the key issues impacting the drafting of the Local Plan objectives, *“changes to national planning policy, including the weakening of Green Belt protection; introduction of grey belt; and a significant increase in the local housing need”* as reasons for some objectives being more difficult to deliver.
- 5.1.2. Cognisant of the above, the Commissioners considers that the current Local Plan objectives, although a good starting point, will need to be updated to reflect the current and emerging national policy context.

OB 3 - Do you feel that the option of taking forward the current Local Plan objectives into the new Local Plan, as set out in Option A 'Take forward the current Local Plan objectives' above, is an appropriate approach?

- 5.1.3. Generally, the Commissioners considers that the current Local Plan objectives provide a stronger baseline for updating the Sustainability Appraisal objectives insofar as they provide overarching strategic goals, formatted in the context of the principles of sustainable development. However, as mentioned within the response to question OB 1, the Commissioners considers that updates should be made, not only to objectives SO1, SO3, SO9, SO10, but to all objectives, to ensure that these reflect the new Local Plan vision for the borough.
- 5.1.4. The Local Plan objectives should focus on delivery in order to achieve the growth aspirations of the borough, whilst also including reference to the Climate Emergency and achieving the overarching aims of the Plan for the Borough (2024-2028) and the Cheshire West and Chester Climate Emergency Response Plan (2020).
- 5.1.5. The Commissioners considers that, although all current Local Plan objectives should be updated to reflect the new emerging opportunities and challenges facing the borough, objectives SO4, SO5 and SO6 represent those which are key to ensuring the delivery of necessary growth across Cheshire West and Chester. Cognisant of this, the Commissioners suggests that the following updates to these objectives are made:

## 5.2. Current Local Plan Objectives – SO4 and SO5

- 5.2.1. The Commissioners is supportive of objectives SO4 and SO5 insofar as they highlight the importance of placing the provision of infrastructure, facilities and amenities at the forefront of the emerging Local Plan, both through, and in support of, the delivery of new development. Furthermore, the Commissioners supports the general aim of these objectives, as they will enable sustainable growth to be bolstered across Cheshire West and Chester, in alignment with paragraphs 20(b) and 22 of the NPPF.

- 5.2.2. In order to strengthen the effectiveness of these objectives, the Commissioners considers that direct reference should be made to the role of large-scale development sites located on the edge of key settlements, in achieving improved infrastructure and reliable transport networks. The Commissioners notes that such reference would align with the objective SO9, as well as the Commissioners’ preferred spatial strategy for the Local Plan, which is centred around focussing development in proximity to strategic transport corridors.
- 5.2.3. The Commissioners considers that new development, particularly development in proximity to existing strategic transport corridors and key settlements, will act as a catalyst for future infrastructure investment in the borough, in turn bolstering the sustainability and growth aspirations of the emerging Local Plan and ensuring that Cheshire West and Chester becomes increasingly inclusive and accessible.

### 5.3. Current Local Plan Objective – SO6

- 5.3.1. The Commissioners supports objective SO6, and notes that in order to ensure this objective is met, a range of viable and readily deliverable sites should be allocated within the emerging Local Plan, which should ensure all differing market requirements and housing needs are identified and responded to positively across the borough.
- 5.3.2. Such allocations should be distributed in line with identified need in order to provide choice in housing type and location across all areas of the borough, regardless of size. However, a preference should be given to sites that benefit from proximity to the existing city of Chester and the main towns, in order to ensure the delivery of sustainable communities across the borough and more generally, to assist in meeting the wider ambitions of the emerging Local Plan.

OB 4 - Do you think that objectives SO1, SO3, SO9, SO10 need to be amended if they are to be taken forward into the new Local Plan? Do you have any suggestions for how they should be amended?

- 5.3.3. As noted in response to questions OB 1 and OB 3, the Commissioners considers that updates be made to all objectives, inclusive of objectives SO1, SO3, SO9, SO10, to ensure that these reflect the new Local Plan vision for the borough.

### 5.4. Current Local Plan Objective – SO1

- 5.4.1. The Commissioners supports objective SO1 and considers that it remains largely reflective of the preferred settlement hierarchy within the emerging Local Plan. The Commissioners particularly supports reference to the main town of Ellesmere Port, and considers that allocations within this settlement should underpin this objective in order to bolster sustainable growth within the borough.

### 5.5. Current Local Plan Objective – SO9

- 5.5.1. Whilst the Commissioners notes the important role previously developed land can play in delivering sustainable development, as is noted within Paragraph 125 of the NPPF, large-scale greenfield opportunities will be fundamental in not only meeting the housing needs of the borough, but also ensuring the growth and vitality of all areas in Cheshire West and Chester through the delivery of infrastructure, community facilities, and open space.
- 5.5.2. Cognisant of this, the Commissioners supports objective SO9 however suggests that, in the context of *“the majority of development within and on the edge of the main urban areas and key service centres”*, reference to the role of large-scale development sites in these areas should be noted. The Commissioners concurs that growth should be prioritised in established settlements that benefit from a range of supporting services and facilities but notes that the emerging Local Plan should look to allocate sites that would be best equipped to benefit from existing infrastructure, whilst also providing new infrastructure and services to the borough. The Commissioners notes that their Site would be able to provide and/or connect into new infrastructure and services to support and expand upon the existing sustainable communities. The Site would also provide the opportunity for

the creation of high-quality sustainable travel modes i.e., walking routes, cycle routes, and bus services as well as the possibility for mobility hubs which benefit not only the new community, but also existing residents within Ellesmere Port and the wider locality.

- 5.5.3. Finally, the Commissioners notes that the language used within objective SO9 should be updated to reflect the settlement hierarchy as referenced within SS 4 – notably this refers to Chester as the “city”, and the settlements of Ellesmere Port, Northwich and Winsford as “main towns”.

## **5.6. Current Local Plan Objective – SO10**

- 5.6.1. The Commissioners generally supports objective SO10 insofar as it aims to support the environmental quality and character of the borough. However, the Commissioners considers that the objective should retain the intention to protect the character of the North Cheshire Green Belt, but to also reflect the removal of Green Belt land, if, following robust evidence, such a removal is to be undertaken to bolster growth within the borough.

## 6. Sustainable Development

SD 1 - 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?

- 6.1.1. The Commissioners is largely supportive of the suggested policy approach towards sustainable development which sets out enhanced requirements for new developments in the context of ensuring that climate change mitigation and adaption is prioritised in light of Cheshire West and Chester's declared Climate Emergency.
- 6.1.2. The Commissioners is supportive of the use of the caveat "*where relevant*" within the policy approach, and suggests that, when considering these sustainable development requirements in conjunction with the need to deliver much needed housing across the borough, such requirements should be considered on a case by case basis.
- 6.1.3. It is considered that new development will act as a catalyst to future infrastructure investment in the district, which will bolster the sustainability and growth aspirations of the emerging Local Plan and ensure that Cheshire West and Chester becomes increasingly inclusive and accessible, satisfying many of the requirements of policy approach SD 1. Cognisant of this, and with awareness of the need for CWCC to deliver 1,914 homes per annum as a minimum under the new standard method, the Commissioners stresses the importance of ensuring that these requirements do not result in much needed development becoming unviable or undeliverable. Each development should endeavour, where possible, to deliver these climate mitigation and adaption requirements, however this should not come at a detriment to timely delivery.
- 6.1.4. The Commissioners understands the importance of delivering these climate mitigation and adaption requirements in order to futureproof the borough in reaction to the declared Climate Emergency. Therefore, the Commissioners suggests that the Local Plan seek to prioritise the allocation of large-scale development sites which are more easily able to incorporate requirements such as "*high quality, interconnected and multifunctional green and blue infrastructure*", "*water efficiency, water recycling and rainwater harvesting measures*" and "*sustainable transport choices to create healthy and inclusive communities*", through holistic masterplanning.

# 7. Spatial Strategy

SS 1 - Is there any reason for the Council not to plan for delivering a minimum of 1,914 new homes each year?

- 7.1.1. To ensure that the emerging Cheshire West and Chester Local Plan is positively prepared, the Commissioners considers that the Council should set a housing requirement of at least 1,914 homes per annum, in line with national policy.
- 7.1.2. The Planning Policy Guidance (PPG) states that the standard method figure identified under the recently published NPPF and adjusted following guidance of affordability ratios, is *“a minimum annual housing need figure”*. The new Standard Method figure was introduced under the backdrop of the Government’s strong ambitions to deliver 1.5 million homes over the next five years. As such, Cheshire West and Chester’s housing requirement should be no less than 1,914 homes per annum, which equates to approximately 28,710 homes over the proposed 15 year plan period. However, as the Commissioners has already noted, the emerging Local Plan period should be aligned to that of the current CWCC Local Plan, covering 20 years – which would result in approximately 38,280 homes across the plan period.
- 7.1.3. The Commissioners considers that, at a minimum, the standard method figure should be planned to ensure alignment with Paragraphs 15 and 16 of the NPPF, which states that plans should *“provide a positive vision for the future”* and be *“prepared positively in a way that’s aspirational and deliverable”*.
- 7.1.4. The Consultation Document acknowledges that *“authorities would be able to justify a lower housing requirement than the figure the method sets on the basis of local constraints on land and delivery”*. The Commissioners notes that any reduction on the housing requirement of 1,914 homes per annum, as set out through the standard method, would have to be clearly justified through robust evidence, and all opportunities for meeting this need should be fully explored. At present, the Commissioners does not consider that there is any evidence which would justify a lower housing requirement, and stresses the importance of the preparation of a Housing Needs Assessment to establish the housing requirement figure for the borough.

## 7.2. Housing Land Monitor Summary Report (2025)

- 7.2.1. The Housing Land Monitor Summary Report 2025 notes that there has been an annual surplus in the delivery of homes since 2014 compared with the adopted Local Plan target of 22,000 homes (1,100 per annum). With the report detailing that year’s 2016/17, 2017/18 and 2018/19 delivered annual net completions in excess of even the new proposed standard method figure of 1,914 homes per annum.
- 7.2.2. The net total of homes anticipated to be delivered from 2017-2025 as summarised within the Housing Land Monitor Summary Report 2025 totalled 8,800, however 15,335 were delivered. This significant surplus of delivery suggests that the adopted Local Plan is not aspirational enough, with the housing target falling short of the actual delivery potential of the borough.

- 7.2.3. Cognisant of the above, the Commissioners considers it essential to ensure the housing target within the emerging Local Plan is **at least** the proposed standard method figure of 1,914 homes per annum, in order to not only sufficiently meet demand, but to also support the growth aspirations of the borough. As the net completions across 2016/17, 2017/18 and 2018/19 has demonstrated, housing has historically been delivered in excess of this standard method figure and therefore the Commissioners considers that the Local Plan should be able to facilitate the level of growth detailed through the proposed standard method figure, **as a minimum**. The Commissioners stresses the importance of ensuring that the Local is *“prepared positively, in a way that is aspirational but deliverable”* as required by paragraph 16 of the NPPF, which should be reflected within the housing delivery target for the borough.
- 7.2.4. The Commissioners recommends that CWCC seek to commission an updated Housing Needs Assessment to inform the preparation of the emerging Local Plan. The Commissioners emphasises the importance of this document and in turn the methodology utilised within it when identifying the needs and requirements of different parts of the borough and to reach an appropriate and aspirational minimum homes per annum figure for the emerging Local Plan. This will ensure that the Local Plan remains in line with paragraph 16 of the NPPF.

### 7.3. Undeveloped Planning Permissions and Local Plan Allocations

- 7.3.1. The Land Availability Assessment (Stage One) (2025) report suggests that there are sites on previously developed land without planning permission, including undeveloped Local Plan allocations, within the main urban areas and Key Service Centres, with a potential capacity of just over 5,000 homes. Additionally, the latest housing land monitoring data indicates that the borough currently has undeveloped planning permissions for almost 6,000 homes.
- 7.3.2. The Commissioners notes that the continued inclusion of such allocations and planning permissions within the Local Plan would result in uncertainty in the deliverability of the overall housing needs across the borough. The Commissioners considers that a Local Plan that does not provide allocated sites that are confidently deliverable over the plan period nor an appropriate strategy for the delivery of the housing requirement would ultimately result in an unsound Local Plan.
- 7.3.3. Therefore, the Commissioners considers that CWCC should undertake further research on the undeveloped and unimplemented sites in order to appropriately justify the retention of any allocations which have not been brought forward through the current Local Plan.
- 7.3.4. It is stressed that, in order for the plan to be sound, sites should be evidenced to be deliverable and achievable within the Plan period. Only then should they be allocated and subsequently considered as contributors to meeting the housing need of the borough. The Commissioners considers that alternative sites that provide deliverable and achievable sustainable development, such as the Commissioners’ landholdings ‘Land South of Ellesmere Port’, should be prioritised for allocations over those which have remained unimplemented.

SS 2 - 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?

- 7.3.5. The Commissioners does not consider that a stepped housing requirements that plans for a lower level of housing delivery earlier in the plan period to be appropriate for the emerging Local Plan. As noted within the response to question SS 1, the Commissioners considers that the borough has evidenced potential to deliver a significant number of homes per annum, and that the emerging Local Plan should seek to plan for the delivery of 1,914 homes per annum as a minimum, across the whole Local Plan period, in line with the standard method figure.
- 7.3.6. In order to ensure that fulfil the aspiration of the emerging Local Plan, in which all areas of the borough are able to *“grow and evolve”*, delivery of the evidenced housing need should be met and sustained throughout the plan period, and not focussed only on the latter years.

- 7.3.7. In addition to sustained delivery of homes being essential for the growth of the borough, it is also needed to ensure the Local Plan is prepared in line with national policy. Paragraph 72 of the NPPF notes that planning policies should identify a supply of *“specific, deliverable sites for five years following the intended date of adoption”* as well as *“specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period”*.
- 7.3.8. Cognisant of this, to ensure that growth is bolstered across the borough throughout the entire Local Plan period, and the Local Plan aligns with national policy, the Commissioners considers that the Local Plan should allocate available, deliverable and viable sites that ensure a minimum of 1,914 homes are delivered per annum, every annum.

### SS 3 - Is there any reason for the Council not to plan for delivering a minimum of 9.9 hectares of employment land each year?

- 7.3.9. The Consultation Document notes that the Economic Needs Assessment (2025) concludes *“that the most robust approach is for the authority to plan for around 198 hectares of employment land to meet a range of types and sizes of site over a 20-year period (this equates to 9.9 hectares per year)”*.
- 7.3.10. However, forming a general review of the current employment land supply across the borough, the Annual Monitoring Report (2024) notes that the trajectory under indicator STRAT2(F) shows that for 2010-2030, there is sufficient provision of employment land to meet the borough wide requirement of 365ha over the existing plan period.
- 7.3.11. At present, it is proposed that the emerging Local Plan would deliver significantly less employment land than the current Local Plan (9.9ha compared to 18.25ha) which the Commissioners considers contradicts the robust and resilient Cheshire West and Chester economy which the Economic Needs Assessment (2025) notes has *“seen growth over the last decade”*.
- 7.3.12. Cognisant of this this, the Commissioners considers that the emerging Local Plan should be aspirational in determining a target figure for the supply of employment land in order to continue to bolster growth across Cheshire West and Chester. Therefore, the Commissioners considers that additional employment land supply should be sought in order to ensure that the emerging Local Plan meets the delivery potential of the borough, and in turn its economic growth potential. This would also ensure that the emerging Local Plan meets the requirements paragraph 16 of the NPPF which notes that Local Plans should be aspirational and positively prepared.

## 7.4. Ellesmere Port

- 7.4.1. Considering the above, the Commissioners notes that the settlement of Ellesmere Port provides a unique opportunity to bolster economic growth through the delivery of employment opportunities and should be considered as a key growth area within the emerging Local Plan.
- 7.4.2. As noted within the Employment Needs Assessment (2025), the *“Government has recently announced further carbon capture investment that Ellesmere Port is expected to benefit from, developing its cluster of existing businesses. This location can continue to attract innovative flagship low carbon technologies as well as broader general industrial and distribution activities”*. In addition to this, Ellesmere Port also boasts a large visitor economy, that also provides significant employment opportunity for the borough.
- 7.4.3. The settlement of Ellesmere Port is positioned in a strong location to benefit from continued economic growth and associated job creation, with paragraph 7.12 of the Draft Employment Areas Survey (2023) noting that it’s *“excellent access to the motorway network M53 and M56”* and *“strategic location for new economic development, investment and specialist industries linked to green technologies, petro-chemicals and advanced motor manufacturing”* provide a unique opportunity to bolster economic growth within the borough, whilst helping achieve CWCC’s emerging aspirations around futureproofing the borough in light of the Climate Emergency declared by CWCC in May 2019.

7.4.4. The Commissioners considers that large-scale sites in proximity to Ellesmere Port in particular, such as 'Land South of Ellesmere Port', should be allocated, contributing to an aspirational employment land figure to continue to bolster economic growth across the borough. Further details of the opportunities provided by 'Land South at Ellesmere Port' are discussed within this representation, as well as through the Vision Document as prepared by JTP, that forms part of this submission.

SS 4 - 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?

7.4.5. Whilst the Commissioners considers a 'previously developed land-first' approach to be an appropriate starting point when considering the growth of a borough or district, as is noted within Paragraph 125c of the NPPF, in the case of Cheshire West and Chester, the Commissioners would advocate for the prioritisation of greenfield opportunities in order to ensure that the significant housing needs of the borough are met, but also to ensure that the growth and vitality of all areas in Cheshire West and Chester is maximised.

7.4.6. The Commissioners is supportive of the concept of Urban Extensions, and notes that NPPF paragraph 77 considers that *"the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities"*. Given the need for the Local Plan to deliver 1,914 homes per annum as a minimum, however the Commissioners notes there is an opportunity to deliver more than this, the Commissioners considers that the spatial strategy should first look to prioritise the allocation of readily available, deliverable and viable Urban Extensions, and then look to supplement these allocations with previously-developed sites.

7.4.7. Large-scale Urban Extensions are able to provide and/or connect into new infrastructure and services including schools, community centres and doctor's surgeries to create and subsequently support both existing and new sustainable communities. Such sites also provide the opportunity for the creation of high-quality sustainable travel modes such as walking routes, cycle routes, and bus services, as well as providing the possibility for mobility hubs. These infrastructure provisions, which will be implemented alongside large-scale sites, benefit not only the new community, but also existing residents within the adjacent settlements and wider borough, by reducing the need for travel by car and providing easier access to services/facilities. These large-scale Urban Extensions also provide the opportunity to integrate high-quality and considered green and blue infrastructure into a holistic masterplan from an early stage, ensuring biodiversity enhancements, open space and sustainable drainage solutions are provided, which would assist CWCC in achieving its climate change aspirations.

7.4.8. The Commissioners notes the reference to the possibility of release of Green Belt land to provide such Urban Extensions, and are supportive of this approach insofar that it can be evidenced that the removal of such sites would not negatively impact the function of the Green Belt. The Commissioners notes that 'Land South of Ellesmere Port', represents an example of a large-scale Urban Extension site that would not impact upon the function if the Green Belt should its designation be removed. Further information on the Site's Green Belt designation is provided later in this representation.

SS 5 - 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?

7.4.9. The Commissioners is supportive of a Settlement Hierarchy in order to prioritise the location for the majority of housing growth, and are generally supportive of the current Settlement Hierarchy as drafted within policy approach SS 4.

- 7.4.10. The Commissioners notes that a considered approach to the Settlement Hierarchy and subsequent distribution of allocations should be utilised through the emerging Local Plan. The allocation of new development should be centred around place-based need and the creation of truly sustainable communities that will serve the needs and wants of Cheshire West and Chester’s residents as well as support the region’s health, wellbeing, and climate change agenda. The Commissioners also notes that the Settlement Hierarchy should be aligned to the Spatial Strategy, which prioritises the allocation of Urban Extensions to established settlements, which already benefit from facilities, services and infrastructure. In this respect, the Commissioners is supportive of focussing the largest proportion of growth in the larger and more sustainable settlements identified in the Settlement Hierarchy, such as Ellesmere Port.
- 7.4.11. The Commissioners is also supportive of ensuring proportionate growth is also planned for across smaller sustainable settlements, however stresses that this should be considered secondary.
- 7.4.12. The Commissioners considers that the Settlement Hierarchy policy be supported by a suite of robust evidence documents in order to be effective through the plan period, as well as to ensure the needs of the whole borough are met holistically.

## 7.5. Ellesmere Port

- 7.5.1. The Commissioners is supportive of the position of Ellesmere Port as a “*main town*” within the Settlement Hierarchy.
- 7.5.2. Furthermore, the Commissioners considers that, within Ellesmere Port, the allocation of large-scale sites such as ‘Land South of Ellesmere Port’ provides an opportunity to deliver sustainable development to assist in meeting the boroughs’ housing need, whilst also providing co-located employment provision, community facilities, high-quality open space, infrastructure and active travel links.
- 7.5.3. The allocation of such sites, in proximity to existing sustainable settlements, would enable existing infrastructure and services to be utilised and improved, in line with paragraph 77 which notes that “*the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as. . . significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes)*”.

SS 6 - Should all settlements have some level of development, regardless of whether they are identified in the settlement hierarchy?

- 7.5.4. The Commissioners is supportive of the emerging Settlement Hierarchy and Spatial Strategy, in which the important role of well-considered Urban Extensions and large-scale allocations is prioritised.
- 7.5.5. However, as noted within the response to question SS 5, the Commissioners is supportive of allocating proportionate growth to smaller settlements across the borough, whether they are referenced within the Settlement Hierarchy or not. The Commissioners considers the importance of understanding place-based need and framing housing provision around this with regards to specific areas across the borough, in order to assist in the growth of the more rural areas and provide choice on where to live.

SS 9 - Have circumstances changed since the adoption of the Local Plan (Part One), that would now justify Green Belt release?

- 7.5.6. The Commissioners considers that the circumstances have significantly changed since the adoption of the Local Plan (Part One), particularly in the context of the Government’s strong ambitions to deliver 1.5 million homes nationally over five years. The new Standard Method figure was introduced under the backdrop of this ambition, which resulted in a significant uplift of the minimum annual housing need figure for Cheshire West and Chester to 1,914 homes per annum.

7.5.7. Due to the significant size of the North Cheshire Green Belt, the borough is challenged with a limited amount of available previously-developed land or non-Green Belt greenfield land. Therefore, given the need to deliver 38,280 homes, spread across a suggested 20 year plan period, and cognisant of the position of available land across the borough, the Commissioners considers that Green Belt release is now justified to ensure that the housing needs of the borough can be met.

## 7.6. Green Belt Designations

7.6.1. More generally, the Commissioners considers that many of the Green Belt designations across Cheshire West and Chester precedes the development of significant highways infrastructure. Therefore, the Commissioners considers that a Green Belt Review be undertaken to inform the growth locations to be allocated within the emerging Local Plan.

7.6.2. With regards to the Commissioners' Site specifically, the designation of the Green Belt across the Site precedes the developments of the M53 and M56 motorways and as such the land between Ellesmere Port urban area and the M56 is now separated from the wider countryside north of Chester with the M56 acting as a defensible boundary to the south. Given this, the Commissioners considers that the removal of the Site from the Green Belt would not impact on the separation of the settlements of Ellesmere Port and Chester and that the land no longer meets the purposes of designating land as Green Belt set out in the NPPF. Further information on the justification for the removal of the Site from the Green Belt is provided within the Land at Little Stanney Lane, Ellesmere Port – Green Belt Review Technical Note (August 2025) submitted alongside this representation.

SS 11 - Please select the option which is the most appropriate spatial strategy for Cheshire West and Chester:

- d. Option A - Retain the Green Belt
- e. Option B - Follow current Local Plan level and distribution of development
- f. Option C - Sustainable transport corridors
- g. None of these

7.6.3. The Commissioners considers that Option B is the most appropriate spatial strategy for Cheshire West and Chester.

SS 16 - Do you feel that Option B is an appropriate spatial strategy for the new Local Plan?

7.6.4. The Commissioners considers that Option B is an appropriate spatial strategy for growth across the borough. As referenced in response to SS 4 and SS 5, the Commissioners supports the focus of development in proximity to the "*Cheshire, Ellesmere Port, Northwich and Winsford*" and highlights the role large-scale sites such as 'Land South of Ellesmere Port' (a portion of which makes up growth area EP01) can play in enhancing the already "*good sustainable connectivity and design relating to existing built form*" that they benefit from.

## 7.7. Housing

7.7.1. The Commissioners is particularly supportive of "*large urban extensions around Ellesmere Port*" as is referenced in Option B, which would include the "*total Green Belt release of sites to deliver 11,000 homes*".

7.7.2. The Commissioners considers that large-scale greenfield sites in proximity to "*main towns*" such as Ellesmere Port, provide an opportunity to holistically plan for a new community, incorporating the services, facilities and infrastructure required to support a truly sustainable development, providing a vibrant and sustainable location for residents to live. In addition to providing new well-located housing and additional facilities, large-scale sites can also expand on and improve existing services, facilities and infrastructure in proximity by supporting improvements to sustainable transport links, as well as existing community and retail services and facilities.

7.7.3. Additionally, large-scale greenfield sites, such as the Commissioners’ Site, offer greater flexibility for on-site affordable provision, which directly contributes to mixed communities. The Commissioners considers the importance of allocating such sites for market housing, as a key method in which to support the delivery of affordable homes across both Ellesmere Port, and the wider Cheshire West and Chester area.

## 7.8. Employment

7.8.1. For employment development specifically, utilising Option C would enable residents to access new and existing job opportunities easily, positioning themselves in sustainable locations in regard to the strategic and sustainable transport networks. Furthermore, many of the locations in which development is intended to be focussed, such as Ellesmere Port, benefit from established and growing industries. Notably, the Draft Employment Areas Survey 2023 notes that there are “*major employers located in Ellesmere Port with large scale sites and scope for expansion (Encirc and Protos)*”. Focussing development in this location presents an opportunity to expand upon and complement these innovative low carbon technology facilities through the provision of complimentary new low-carbon energy solutions within new sustainable mixed-use communities.

7.8.2. Large-scale sites earmarked within Option B, such as the Commissioners’ Site ‘Land South of Ellesmere Port’ (part of which is included within reference EP01), are located in close proximity to strategic and sustainable transport networks and provide the opportunity for transport connection extensions associated with bolstering network capacities and accessibility. Through these network improvements, residents of the both the new sustainable mixed-use community and wider residents of the existing settlement, in this case Ellesmere Port, benefit from increased accessibility and connectivity around the settlement. In addition, these large-scale mixed-use sites provide the opportunity for the creation of high quality sustainable travel modes i.e., walking routes, cycle routes, and bus services which also benefit not only local residents, but also residents within the wider locality. Employment developments also provide the opportunity to integrate well-considered green and blue infrastructure strategy into the masterplan from an early stage, ensuring appropriate biodiversity enhancements, open space and sustainable drainage solutions are provided, which assists CWCC in achieving its climate change aspirations.

## 7.9. Environmental Considerations

7.9.1. Finally, considered masterplanning of the large-scale greenfield sites, such as ‘Land South of Ellesmere Port’ could ensure that areas of openness are retained through the provision of integrated high-quality open space and considered development parcels, which would assist in retaining the distinction between these “*main towns*” and other settlements, mitigating the removal of such sites from the Green Belt, whilst also improving access to open space for new and existing residents, bettering their health and wellbeing.

SS 20 - Do you think that the potential ‘showstopper’ constraints identified above, are correct or are there any others that we should consider?

7.9.2. The Commissioners notes that, when considered in isolation, the identified ‘showstopper’ constraints are largely correct, however the Commissioners considers that areas of land should not be excluded based on these ‘showstoppers’ where it can be demonstrated that complementary uses can be provisioned through a holistically masterplanned large-scale sustainable development.

7.9.3. As an example, the Commissioners Site includes a large area of land to the east of the M53 which lies within area of flood risk. However, as is detailed within the Vision Document as prepared by JTP, , this area of land is earmarked for nature recovery and low carbon energy provision, which the Commissioners consider to be uses compatible with a site constrained by flood risk.

7.9.4. Cognisant of the above, the Commissioners stresses the importance of ensuring that the allocation of sites such as 'Land South of Ellesmere Port' are brought forward wholesale, rather than areas of land being excluded due to potential 'showstopper' constraints, in order to ensure that nature recovery and ecological connectivity opportunities can be fully unlocked and subsequently delivered, as these significant interventions would require integration within a wider proposed development in order to be delivered.

SS 26 - Which of the identified potential growth areas around Ellesmere Port do you consider to be the most suitable?

7.9.5. The Commissioners considers that growth area EP01 is the most suitable area for development within Ellesmere Port.

7.9.6. The Commissioners notes the importance of considering both housing and economic development aspirations and strategies for growth, concurrently, in order to deliver sustainable development and communities within Cheshire West and Chester. By ensuring that the development of homes and employment spaces are not considered in isolation, and more specifically, delivered through large-scale mixed-use sustainable development, CWCC will be able to ensure greater access and provision of services, facilities and sustainable transport modes across the borough. Therefore, the Commissioners are most supportive of area EP01, which is earmarked for both housing and employment use.

7.9.7. At present, EP01 encompasses an area of land owned largely by the Commissioners, in addition to a number of other landowners. The Commissioners is supportive of development in this location, and strongly supports the allocation of their landholdings at Ellesmere Port, but would encourage CWCC to consider whether a single landowner site, such as 'Land South of Ellesmere Port' would provide a more available and deliverable site, given the potential complexities that could arise from a multi-landowner allocation.

## **7.10. Land South of Ellesmere Port**

7.10.1. The Commissioners notes that the growth area includes a portion of their Site', which was submitted to CWCC as part of the Call for Sites exercise within the Land Availability Assessment – Stage One Consultation (2024), as a unique, mixed-use development to provide a new sustainable community to the south of the Ellesmere Port.

7.10.2. The Commissioners considers that, in addition to EP01, the growth area should span to the east of the M53 to encompass the remainder of 'Land South of Ellesmere Port' to allow all elements of the sustainable community, as detailed within the accompanying JTP Vision Document (January 2025), to be realised.

7.10.3. A large-scale development such as a new mixed-use sustainable community at 'Land south of Ellesmere Port' would be able to extend on the existing character of Ellesmere Port through high-quality, holistic masterplanning. Furthermore, development on the Site would provide not just a range of new services, facilities and transport and connectivity infrastructure, but also employment opportunities that will attract new investment to Ellesmere Port and complement existing employment locations within the settlement and a range of new homes to support a diverse and inclusive community, assisting CWCC in meeting housing need within the borough.

7.10.4. Given the scale of the Site and its proximity to the M53 and M56, there is the potential to provide significant employment opportunities which could support growth within a range of sectors. In addition to this, the Site's strategic location provides a strong opportunity to provide low-carbon energy solutions within the new mixed-use community, which could be utilised by adjacent established industries such as Stanlow and ORIGIN.

- 7.10.5. Unlike the currently earmarked EP01, 'Land South of Ellesmere Port' is owned entirely by one landowner and can therefore be comprehensively masterplanned and is readily available to be delivered. The Site would help deliver well-located residential and employment land within Ellesmere Port that would utilise existing infrastructure links and the nearby emerging and established employment institutions to assist in bolstering economic growth in Cheshire West and Chester, which would help to realise the aspirations and vision of the emerging Local Plan.
- 7.10.6. Further information has been provided through the submission of the Vision Document as prepared by JTP, , as well as a series of technical notes and an solar energy concept plan. These submissions have been informed by a comprehensive range of technical evidence to further demonstrate that the Site is developable, readily available and beneficial to the growth of Ellesmere Port.

## 8. Ellesmere Port

EP 1 - Do you agree with the suggested policy approach towards Ellesmere Port, as set out in EP 1 'Ellesmere Port' above? If not please suggest how it could be amended?

- 8.1.1. The Commissioners is supportive of the suggested policy approach towards Ellesmere Port, particularly with regards to the requirement for *“all developments...to support physical and landscape improvements to the gateways, corridors and green spaces within Ellesmere Port including along the M53/Shropshire Union Canal Corridor.”* As noted within the response to question OS 1, GI 1, GI 3 and MISC 3 within this representation, and within the Landscape Technical Note prepared by Bradley Murphy Design (August 2025) as submitted, the Commissioners’ Site provides an opportunity to create key landscape-led gateways along existing highways infrastructure, as well as provide a destination for canal side leisure and learning activities along the Shropshire Union Canal.
- 8.1.2. As mentioned previously, if the entirety of the Site is brought forward, as part of a future Local Plan allocation, there is an opportunity for the Commissioners to collaborate and partner with both the Cheshire Wildlife Trust and the Canals & Rivers Trust, as part of future development proposals. Indeed, the Commissioners has already been in initial conversation with both parties as critical friends, to assist in the development of the Vision for the Site.
- 8.1.3. Allocation of the Site in its entirety would provide the opportunity for:
- An enhanced and activated Canalside with development frontages, public open space and marina / moorings;
  - improved recreational capacity and connectivity along towpath and highways assets, with an enhanced leisure route for cycling and walking celebrate and enhance the Canalside, its natural and historic assets, with the creation of a new quayside parkland destination;
  - creation of a new tourism offer and relieve the recreational pressure along the towpath, by providing an alternative recreational route through the adjacent Commissioners land;
  - creation of a new marina and Canalside frontages, through a leisure hub, providing a stop off point for boats between Chester and Ellesmere Port and bring a host of economic benefits to the area.
- 8.1.4. Exclusion of the land to the east of the M53, from any future EP01 allocation, precludes the ability to enhance these green infrastructure initiatives, with the wider benefits and opportunities from development of the Site not fully achieved - the Shropshire Union Canal would remain enclosed on its boundaries, lacking activity and positive frontages and with ongoing limits to the recreation capacity on the towpath (due to existing narrow width of c. 1.5m and poor surfacing).

EP 2 - Do you have any comments on the use of previously developed land within Ellesmere Port?

- 8.1.5. As noted within the Commissioners response to SS 1 and SS 4, the Commissioners consider a ‘previously developed land-first’ approach to not be an appropriate starting point when considering growth in the borough. Although the Commissioners notes the sustainability opportunities previously-developed land provides, as is noted within Paragraph 125c of the NPPF, the prioritisation of greenfield opportunities will be fundamental in not only meeting the housing needs of the borough, but also ensuring the growth and vitality of all areas in Cheshire West and Chester.
- 8.1.6. The Commissioners is supportive of the use of small areas of previously developed land in proximity to the Ellesmere Port town centre in order to assist in catalysing the vibrancy and activity

of the settlement, but stresses that this should be considered secondary to the allocation of large-scale greenfield sites, which provide a much greater opportunity for sustainable development, the provision of improved and additional services and facilities, affordable housing, and green infrastructure which will ultimately better assist CWCC in achieving both their wider growth and climate change aspirations.

# 9. Green Belt and Countryside

GB 1 - Do you agree with the suggested policy approach towards Green Belt and countryside, as set out in GB 1 'Green Belt and countryside' above? If not please suggest how it could be amended?

- 9.1.1. The Commissioners is generally supportive of the policy approach towards Green Belt and Countryside, particularly the need to update the policy to set out the approach to grey belt and Green Belt Review evidence.
- 9.1.2. The Commissioners is also supportive of including potential uses appropriate to countryside, and consider that low carbon energy should be included in these uses. Low carbon energy development such as solar and wind development often lends itself to be collocated with nature recovery. Indeed, the policy approach to solar development notes that *“the land around the structures should be used for livestock grazing, other agricultural use or another use beneficial to the environment or biodiversity”*. The Commissioners considers that, in order to ensure consistency across policies, the opportunity to provide low carbon energy development in the countryside should be referenced within the future Green Belt and Countryside policy.

## 9.2. Land South of Ellesmere Port

- 9.2.1. The Commissioners' Site is currently designated Green Belt; however the designation precedes the highways development of the M53 and M56 motorways and as such the land between Ellesmere Port urban area and the M56 is now separated from the wider countryside north of Chester by a substantial defensible boundary.
- 9.2.2. When considering the Site against the purposes of the Green Belt, it can be summarised that the Commissioners' Site is subject to urbanising influences from substantial existing built form on the southern settlement edge of Ellesmere Port and motorway and highway infrastructure on all sides and therefore:
- makes limited contribution to checking unrestricted sprawl;
  - makes no contribution to preventing towns from merging into one another, with the M56 acting as a clear and defensible southern boundary; and
  - makes no contribution to preserving the setting and special character of historic towns.
- 9.2.3. Therefore, the Commissioners considers that their Site 'Land South of Ellesmere Port' does not contribute positively in a material way to any of the Green Belt purposes and should be removed to allow for its sustainable development. A comprehensive Green Belt Review of the Site has been undertaken by Bradley Murphy Design, which has been submitted with this Representation.

## 9.3. Golden Rules

- 9.3.1. Paragraph 151 of the NPPF notes that *“where Green Belt land is released for development through plan preparation or review, the ‘Golden Rules’ ... should apply”*. The NPPF also notes at Paragraph 158 that *“a development which complies with the Golden Rules should be given significant weight in favour of the grant of permission”*.
- 9.3.2. The Commissioners considers the Site could deliver a sustainable development that complies with the Golden Rules, and therefore notes its suitability for an allocation within the Local Plan in order to assist in the delivery of much needed housing and employment growth across the borough. Table 8.1 provides a summary of the opportunities the Site could provide, in accordance with the Golden Rules.

Table 8.1 – Opportunities at ‘Land South of Ellesmere Port’ in line with the Golden Rules (NPPF Paragraph 156)

NPPF Paragraph 156 – Golden Rule	Compliance of ‘Land South of Ellesmere Port’
<p>a) affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below</p>	<p>Subject to viability, the Site would endeavour to meet the requirements of national planning policy set out at paragraphs 156 and 157. In doing so, the Site will make a very positive contribution to the affordable and market housing needs of the borough.</p>
<p>b) necessary improvements to local or national infrastructure</p>	<p>Improvements to, and creation of, new community facilities, cycling and walking routes and increased areas of green infrastructure accessible to the existing proposed local community.</p>
<p>c) the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.</p>	<p>Enhancing biodiversity through collaboration and partnership with Cheshire Wildlife Trust, to complement Gowy Meadows nature reserve, transforming farmland pastures into a biodiverse wetland habitat mosaic</p>
	<p>The retention and enhancement of the hedgerow, tree and woodland network across the Site, in collaboration &amp; partnership with Mersey Forest, seeking opportunities for new tree / woodland community planting.</p>
	<p>Opportunities to provide access on land currently private and inaccessible. A new active travel network will be pursued – connecting with the existing PRow network and the canal towpath, promoting walking and cycling.</p>
	<p>The provision of high quality accessible green open spaces, integrating active travel and recreational routes:</p> <ul style="list-style-type: none"> <li>- within a 15 minute walk of all homes on the Site and connecting with existing and emerging adjacent green corridors.</li> <li>- making on-site formal and informal recreational facilities available to the existing and new communities.</li> </ul>

9.3.3. Further information on the justification for the removal of the Site from the Green Belt is provided within the Land at Little Stanney Lane, Ellesmere Port – Green Belt Review Technical Note (August 2025) submitted alongside this representation.

# 10. Transport and Accessibility

TA 1 - Do you agree with the suggested policy approach towards transport and accessibility, as set out above in TA 1 'Transport and accessibility'? If not please suggest how it could be amended?

- 10.1.1. The Commissioners strongly agrees with the suggested policy approach towards transport and accessibility as set out within policy approach TA 1, particularly with regards to extending and improving access to the *“local footpath and cycle networks, including greenways, canal towpaths and the Public Rights of Way networks”* by placing new development in *“more sustainable locations”*.
- 10.1.2. In this regard, the Commissioners suggests that reference to large-scale development sites be made within TA 1, specifically noting the ability such sites have in provisioning connectivity enhancements that will aid in connecting these new community to existing settlements, as well as providing enhancements to existing sustainable modes of transport.
- 10.1.3. Additionally, TA 1 notes that *“developments and places should maximise any opportunities for people to be able to meet their regular day to day needs within a reasonable (10 minute/800 metres) walking distance of their homes”*. Again, the Commissioners stresses the importance of the role of large-scale development sites in this context, as the provision of services and facilities in proximity to new housing can be created through the holistic masterplanning of a new community, ensuring that day to day needs can be accommodated within walking distance of a residents home.
- 10.1.4. Considering the Commissioners’ Site specifically, a detailed Transport Note (August 2025) has been prepared by Pell Frischmann which notes the opportunities sustainable development on this Site could provide, which has been submitted alongside these representations.

TA 3 - Are there any schemes listed above in TA 2 'Key local transport infrastructure priorities' that should be retained, modified, or deleted?

- 10.1.5. Generally, the Commissioners is supportive of the key local transport infrastructure priorities as identified. The Commissioners supports the inclusion of the Shropshire Union Canal within the strategic recreational routeways. As noted within the Commissioners’ response to question MISC3, their Site ‘Land South of Ellesmere Port’ provides an opportunity to create a destination for canal side leisure and learning activities along the Shropshire Union Canal. The Site Vision aims to utilise the canal to enhance links to the town centre by improving active travel routes along and to the Canal, whilst activating the canal-side for recreation to improve the health and wellbeing of new and existing Ellesmere Port residents.
- 10.1.6. Overall, the Commissioners considers that the key local transport infrastructure priorities should be reviewed, in the context of new growth options for the borough, and supporting infrastructure needed in order to deliver such options. The Commissioners encourages this to be undertaken through the Infrastructure Delivery Plan which it understands is currently being prepared. Subsequently, these priorities should be updated in order to ensure they represent the most relevant infrastructure schemes across the borough in the context of emerging growth options, rather than reiterating those identified within the adopted Local Plan.

# 11. Infrastructure and Developer Contributions

ID 1 - Do you agree with the suggested policy approach towards infrastructure and developer contributions, as set out above in ID 1 'Infrastructure and developer contributions'? If not please suggest how it could be amended?

- 11.1.1. The Commissioners is generally supportive of the policy approach towards infrastructure and developer contributions insofar as it aims to set clear requirements for developers with regards to infrastructure and service provision. The Commissioners is particularly supportive of the policy approach which notes that *“where viability is a genuine issue...the Council will seek views on how infrastructure requirements could be prioritised”*, demonstrating a level of flexibility which will ensure that much needed development is not delayed or undeliverable.
- 11.1.2. However, the Commissioners considers that, at present, the policy approach could risk viability issues across the borough, particularly with regards to the large-scale greenfield sites, a number of which have been highlighted as potential growth areas under the spatial strategy, and will be much needed in order for the borough to meet its significant housing need.
- 11.1.3. Paragraph 15.7 within the infrastructure and developer contributions supporting text notes that *“viability arguments are unlikely to be justified especially on greenfield sites”* and *“the payment of off-site contributions will not be accepted as a solution if additional costs will fall on the Council or the funding and/or provision off site would not deliver the necessary infrastructure”*. The Commissioners considers these statements to be onerous and lack flexibility, ultimately risking delays to delivery of the large-scale greenfield sites across the borough.
- 11.1.4. The Commissioners considers that, although an overarching infrastructure and developer contributions policy should be in place, it should be flexible to ensure infrastructure and service requirements can be considered on a site by site basis, and development can be flexible in reaction to wider market and political conditions. This is key for large-scale greenfield sites in particular, given the significant period of time in which new sustainable communities take to be delivered.
- 11.1.5. CWCC should consider the implications of requirements around infrastructure and developer contributions in relation to location and type of site, as well as from a viability perspective. The policy should also be suitably flexible to allow for design practicality, necessity over time and suitability (including the nature of the development and physical constraints), rather than being a blanket policy that provides the same requirements to all allocations.
- 11.1.6. Additionally, the Commissioners notes that developers must have the opportunity to be able to demonstrate *“whether particular circumstances justify the need for a viability assessment at the application stage”* if needed, in line with paragraph 59 of the NPPF, which should be able to be considered by the Council without bias. At present, an assumption that *“viability arguments are unlikely to be justified especially on greenfield sites”* suggests a predetermined position with regards to greenfield sites. The Commissioners suggests that reference to viability assessments should be included within the policy, with reference to these being considered by the *“decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date”*.
- 11.1.7. Finally, the Commissioners considers the importance of both the Viability Study and the Infrastructure Delivery Plan in ensuring the viability of sites in relation to the development of essential infrastructure and services. In particular, the Infrastructure Delivery Plan should ensure alignment with new infrastructure required to support the growth of the district brought about by

the new Local Plan, and provide clarity around the delivery of such infrastructure, particularly if this is to be through developer contributions. The Commissioners welcomes the ability to review and provide comment on such evidence base documents, once drafted, and stresses the importance of the robustness of these documents, in order to ensure that viable sites can be allocated through the Local Plan.

# 12. Economic growth, Employment and Enterprise

EG 1 - Do you agree with the suggested policy approach towards economic growth, employment and enterprise, as set out in EG 1 'Economic growth, employment and enterprise' above? If not please suggest how it could be amended?

- 12.1.1. The Commissioners is generally supportive of the policy approach to EG 1, however suggests that greater reference be made to the role of Ellesmere Port in bolstering economic growth, employment and enterprise across the borough, particularly with reference to development opportunities that lie outside of the established Employment Areas.
- 12.1.2. Additionally, the Commissioners considers that direct reference, and subsequent policy alignment should be made for the Invest 2035: The UK's Modern Industrial Strategy (NPPF Footnote 43), which identifies priority sectors for growth. The Commissioners particularly notes that *"clean energy industries"* should be proactively encouraged, and therefore suggests that CWCC seek to *"identify strategic sites"* to accommodate such development within the Local Plan, in order to ensure the Local Plan *"proactively encourages sustainable economic growth, having regard to the national industrial strategy"*.

## 12.2. Ellesmere Port

- 12.2.1. The Employment Area Survey (2023) attributes Ellesmere Port's large offering of flagship or strategically located sites to its *"excellent transport connectivity close to the M56, M53, Manchester Ship Canal and with rail discharge and port facilities"*. The Commissioners considers that Ellesmere Port has the unique opportunity to bolster a large proportion of the boroughs employment growth through the emerging Local Plan, and therefore it is particularly important to ensure that any established Employment Areas, as referenced within EG 1, are deliverable and capitalise on the unique strategic location of the settlement.
- 12.2.2. Rather than prioritising the established Employment Area, the Commissioners considers that locations for allocations for employment land should be based on the needs of the district and ability to deliver the most sustainable developments. These allocations should *"be flexible enough to accommodate needs not anticipated in the plan"* as noted within NPPF paragraph 86d. This should include a range of both new and existing sites, which have been robustly assessed through Economic Needs Assessments and Economic Land Availability Assessments and subsequently allocated to ensure that the growth aspirations of the emerging Local Plan are achieved.
- 12.2.3. It is referenced within the 'Places Background Paper – Ellesmere Port' (March 2024), that Ellesmere Port *"provides a major employment land resource for the borough and has become increasingly successful in attracting new employment opportunities"*. The Commissioners considers that there should be a focus of employment space within Ellesmere Port that looks to go further than the 22 established Employment Areas noted within the Employment Area Study (2023), which should be brought forward specifically through new allocations within the emerging Local Plan. These new allocations should be able to capitalise on existing connectivity infrastructure, as well as compliment the established Employment Areas, to bolster economic growth and vitality across both Ellesmere Port and the wider borough.

## 12.3. Modern Economy

- 12.3.1. The Commissioners considers that the policy wording should acknowledge the importance of supporting the needs of the modern economy, in order to align with Paragraph 86b of the NPPF

which notes that policies should *“pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics”*.

- 12.3.2. Cognisant of this, the Commissioners considers that their Site, provides an optimal location for meeting the economic needs of a modern economy. In doing so, it is considered that Policy EG1 should also make a link to the energy sector specifically recognising the potential for delivering Battery Energy Storage Systems, which are ideally located in close proximity to existing industrial and low carbon energy uses and key strategic road networks. The Commissioners’ Site provides a unique opportunity to provide BESS, which could be suitably integrated within a wider mixed-use masterplan, delivering key development to support the modern economy alongside possible complementary solar energy provision, as well as biodiversity enhancements. The Site Vision has identified land to the east of the M53 as best placed to provide such development, which would be unlocked by the delivery of the wider mixed-use development, proposing housing, employment and community uses to the west of the M53.
- 12.3.3. As noted previously within these Representations, the area of the Site to the east of the M53 is not currently identified within the draft Local Plan growth options. The Commissioners considers that their Site should be allocated wholesale, in order to maximise its potential to serve the modern economy whilst also supporting much improved green infrastructure and nature recovery.

# 13. Visitor Economy

VE 1 - Do you agree with the suggested policy approach towards the visitor economy, as set out in VE 1 'Visitor economy' above? If not please suggest how it could be amended?

- 13.1.1. The Commissioners agrees with the policy approach towards the visitor economy, particularly noting that *“the creation of new tourism opportunities will be supported where this would enhance the existing tourism offer, benefit the local economy and be of a suitable design, scale and type for its location.”*
- 13.1.2. In developing the ‘Land South of Ellesmere Port’ Vision, the Commissioners has been in discussion with the Canals and Rivers Trust (“CRT”), CWCC Regeneration Officers, and neighbours at Cheshire Oaks Designer Outlet which have detailed the existing visitor economy offerings around Ellesmere Port. The Commissioners’ Site presents an opportunity to provide complementary *“cultural attractions and visitor accommodation”* in proximity to Ellesmere Port to support the vitality of the town, in line with the policy approach.
- 13.1.3. At present, the Vision notes the following opportunities that could be provided as part of a large-scale mixed-use development at in proximity to Ellesmere Port:
- A hotel with conference facilities to complement the existing cultural attractions of Ellesmere Port;
  - Provision of outdoor activities along the Shropshire Union Canal to activate the existing waterways asset, and the improvement of key active travel routes along the towpath to improve connections to and from Ellesmere Port;
  - Provision of a leisure hub comprising indoor and outdoor sport facilities; and
  - Outdoor recreational offers in the form of a new park and nature reserve.
- 13.1.4. As the Vision for the Site progresses, the Commissioners will continue to collaborate with local neighbours and key stakeholders to identify key visitor economy opportunities that could be successfully implemented within the proposed development.

# 14. Housing

HO 4 - Do you agree with the suggested policy approach towards delivering affordable housing, as set out in HO 2 'Delivering affordable housing' above? If not please suggest how it could be amended?

- 14.1.1. The Commissioners is supportive of the policy approach towards delivering affordable housing within Cheshire West and Chester.
- 14.1.2. The Commissioners supports the need for an affordable housing policy within the Local Plan which will deliver the level of provision required to support the needs of the borough. At this early stage in the Plan-making process, the Commissioners considers that further work regarding the Plan's viability is required in order to establish the affordable housing requirement, particularly if there are variations proposed on a sub area basis or indeed between Green Belt and non-Green Belt sites.
- 14.1.3. Should the Council seek to propose a significantly higher affordable housing requirement on sites released from the Green Belt than non-Green Belt sites, it is critical that the Council considers carefully whether there are any viability implications, taking into account different housing market areas, and the requirements that are more frequently placed upon large-scale development sites such as provision of supportive infrastructure and additional services and facilities.
- 14.1.4. In order to ensure that the borough's significant housing need can be met, the Commissioners considers that CWCC should look to prevent any delay to the delivery of large-scale development sites that have been released from the Green Belt, which could be brought about by a significantly higher affordable housing requirement.

# 15. Health and Wellbeing

HW 1 - Do you agree with the suggested policy approach towards health and wellbeing, as set out in HW 1 'Health and wellbeing' above? If not, please suggest how it could be amended?

- 15.1.1. The Commissioners agrees with the policy approach towards health and wellbeing, particularly noting the support for proposals that *“aim to promote high quality access to green space across the borough that will support opportunities to widen and strengthen the boroughs cultural, sport, recreation and leisure offer”*. As detailed within section 12 of this Representation, ‘Land South of Ellesmere Port’ presents a unique opportunity to provide a large-scale mixed-use development incorporating the provision of considerable levels of high-quality green space and opportunities to strength the cultural, sport, recreation and leisure offer across the borough.
- 15.1.2. The Commissioners considers that CWCC should ensure their spatial strategy supports large-scale developments that are able to create vibrant and healthy communities across Cheshire West and Chester which will provide an opportunity to promote active and healthy lifestyles across the borough.

# 16. Open Space, Sport, Recreation and Community facilities

OS 1 - Do you agree with the suggested policy approach towards open space, sport and recreation, as set out in OS 1 'Open space, sport and recreation' above? If not please suggest how it could be amended?

- 16.1.1. The Commissioners agrees with the policy approach towards Open Space, Sport Recreation and Community Facilities, particularly noting the support for proposals that *“enhance public access and the recreation value of the recreational routeway network”*. As detailed within section 10 of this Representation, ‘Land South of Ellesmere Port’ presents an opportunity to provide a large-scale mixed-use development incorporating the provision of high-quality green space as well as enhancements to public access and recreation within and to the Shropshire Union Canal, an identified recreational routeway network.
- 16.1.2. CWCC is aware of the importance of the provision of new active travel links, open space, schools and community facilities alongside new homes, particularly their Local Cycle and Walking Infrastructure Plan (2020-2030) which highlights where strategic improvements to the active travel network are required, such as *“improved and safer links between the Ellesmere Port Town Centre and the railway station”*.
- 16.1.3. The Commissioners considers the important role large-scale development sites such as ‘Land South of Ellesmere Port’ can play in ensuring the provision of these new facilities and infrastructure elements, which will be provided in close proximity to residents, increasing accessibility to facilities through walking and cycling.
- 16.1.4. These large-scale development sites are able to provide and/or connect into new infrastructure and services including new schools, community centres and doctors’ surgeries to create sustainable communities whilst supporting the existing locality. Additionally, such sites provide the opportunity for the creation of high-quality sustainable travel options i.e., walking routes, cycle routes, and bus services as well as the possibility for mobility hubs which benefit not only the new community, but existing residents within the wider locality too.
- 16.1.5. Furthermore, large-scale development sites also provide the opportunity to integrate well-considered green and blue infrastructure strategies into a site masterplan from an early stage, ensuring appropriate biodiversity enhancements, open space and sustainable drainage solutions are secured, which ultimately provide opportunities to improve health and wellbeing outcomes. Provision of open space within these large-scale development sites can also ensure developments are safe, accessible and promote social interaction in keeping with paragraph 96 of the NPPF which directly relates to achieving healthy, inclusive and safe places. The Commissioners is committed to ensuring that a well-considered green and blue infrastructure strategy is incorporated into the masterplan at an early stage at their development sites.

# 17. Landscape

LA 1 - Do you agree with the suggested policy approach towards landscape, as set out in LA 1 'Landscape' above? If not please suggest how it could be amended?

- 17.1.1. The Commissioners agrees with the policy approach towards Landscape, particularly noting the support for proposals that *“take full account of the characteristics of the development site, its relationship with its surroundings and views into, over and out of the site”*.
- 17.1.2. As detailed within section 10 of this Representation, ‘Land South of Ellesmere Port’ presents an opportunity to provide incorporate the provision of high-quality green space as well as enhancements to public access and recreation within and to the Shropshire Union Canal. The Proposed Development would take a landscape-led approach to masterplanning, taking full account of the Sites’ relationship with its surroundings, and would seek to provide a series of gateways and linkages from Stanney Woods to the west, to Gowy Meadows in the east, encompassing key features such as:
- A New Nature Recovery Network - identified the potential for a new east / west green corridor through the whole of the Site. This new corridor could be of a scale that it presents a new a Nature Recovery Network (NRN) opportunity - connecting Stanney Woods, the Shropshire Union Canal, the River Gowy Corridor and Gowy Meadows Local Wildlife site (LWS) – providing a transitional landscape corridor through the Site, grading from woodlands to wetlands;
  - Enhancements to the function, environmental value and activation of Shropshire Union Canal;
  - Increased conservation and enhancement of the tree, hedgerow & pond network;
  - Enhancement and expansion Gowy Meadows and Ditches LWS and Nature Reserve, alongside opportunities for collocated renewable energy generation to maximise land efficiency and biodiversity net gain; and
  - Ecological enhancements that align with the emerging Nature Recovery Opportunity Areas within the Cheshire and Warrington Local Nature Recovery Strategy.
- 17.1.3. Further detail on the extensive landscape opportunities of ‘Land South of Ellesmere Port’ are detailed within the Land at Little Stanney Lane, Ellesmere Port – Landscape Technical Note (August 2025) submitted alongside this representation.

LA 2 - Should the key settlement gaps currently defined in Local Plan (Part Two) policy GBC 3 be reviewed? Could they be expanded, and/or should new key settlement gaps be identified in the Green Belt, or other areas to help protect the character of settlements?

- 17.1.4. The Commissioners does not consider that new settlement gaps should be identified within the Green Belt to protect the character of settlements, as this would duplicate a function already covered through a Green Belt designation.
- 17.1.5. As noted within NPPF Paragraph 143, the Green Belt serves five purposes, one of which is to *“prevent neighbouring towns merging into one another”*, another to *“preserve the setting and special character of historic towns”*. Therefore, the Commissioners considers it unnecessary to identify any settlement gaps within the Green Belt across the borough, as such protective functions are already established by virtue of a Green Belt designation.

# 18. Green Infrastructure, Biodiversity and Geodiversity

GI 1 - Do you agree with the suggested policy approach towards green infrastructure, biodiversity and geodiversity, as set out in GI 1 'Green infrastructure, biodiversity and geodiversity' above? If not, please suggest how it could be amended?

- 18.1.1. The Commissioners is generally supportive of the suggested policy approach towards green infrastructure, biodiversity and geodiversity, however, in order to ensure that sustainable growth is bolstered across the borough, elements of the policy criteria should be altered.
- 18.1.2. The Commissioners understands the increasing importance of nature recovery, and support the integration of Local Nature Recovery Strategy's within both plan-making and subsequently, decision-making. However, as noted within the Commissioners' response to the Cheshire and Warrington Local Nature Recovery Strategy Consultation, which took place in March 2025, in order to ensure sustainable development can continue to be brought forward effectively to meet the housing and employment needs, development should not be unnecessarily impacted at site promotion, planning application or delivery stage, by LNRS targets and priorities.
- 18.1.3. Given this, the Commissioners supports that *"developers will need to look at opportunities for nature recovery in line with the LNRS"* if they are *"within or adjacent to either areas of opportunity or designated areas identified in the LNRS"* however stresses that there should be no obligation to deliver such targets and priorities within the policy. Of course, the protection and enhancement of sites, habitats and species should be supported, however this should not come at a cost of delivering much needed sustainable development across Cheshire West and Chester.

GI 3 - Should new Local Plan policy go above the 10% mandatory biodiversity net gain set nationally?

- 18.1.4. The Commissioners considers that Local Plan policy should not exceed the 10% mandatory biodiversity net gain set out nationally. Instead, the Local Plan should direct development to areas in which *"net gains for biodiversity, including by establishing coherent ecological networks"* can be viably delivered, in line with Paragraph 187d of the NPPF. The Commissioners considers that the best opportunity in which to deliver such biodiversity gains and ecological networks is through their integration within large-scale mixed-use developments.
- 18.1.5. The Commissioners considers that their Site provides a significant and unique opportunity to create high-quality nature recovery areas, in proximity to existing green infrastructure assets Gowy Meadows and Stanney Woods. The Vision for the Site includes the potential to extend Gowy Meadows nature reserve, creating a large-scale wetland destination that would transform existing farmland to a biodiverse habitat mosaic. This nature recovery area would link into a wider landscape corridor strategy that spans coherently across the Site, enhancing ecological connectivity and biodiversity from Stanney Woods through to Gowy Meadows.
- 18.1.6. In developing this Vision, the Commissioners has had initial conversations with Cheshire Wildlife Trust ("CWT") in order to understand the potential opportunities that a large-scale mixed-use development could provide in terms of biodiversity enhancements in proximity to the existing assets to the south of Ellesmere Port, and how these could best align to the wider aspirations of the CWT. As the Vision for the Site progresses, the Commissioners will continue to collaborate with the CWT, as well as Mersey Forest, to further establish the nature recovery and ecological connectivity opportunities across the Site.

- 18.1.7. Cognisant of the above, the Commissioners stresses the importance of ensuring the allocation of Site is brought forward wholesale in order to ensure that the aforementioned nature recovery and ecological connectivity opportunities can be fully unlocked and subsequently delivered on Site, as these significant interventions would require integration within a wider proposed development in order to be delivered.

# 19. Energy

EN 1 - Do you agree with the suggested policy approach towards energy, as set out in EN 1 'Energy supplies and energy related developments' above? If not please suggest how it could be amended?

- 19.1.1. The Commissioners is generally supportive of the policy approach towards energy supplies and energy related development, however, considers some amendments should be made to highlight the role that large-scale developments can play in providing low carbon energy as part of wider mixed-use proposals, and to ensure that low carbon energy development and energy supplies can be delivered without restrictive policy requirements.
- 19.1.2. From a national policy perspective, Paragraph 165 of the NPPF notes that Local Plans should *“maximise the potential for suitable [renewable and low carbon] development”*, including *“identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development”*.
- 19.1.3. The borough of Cheshire West and Chester has the fifth highest carbon emissions of any local authority area in England (with the Ellesmere Port Industrial Estate alone consuming 5% of UK energy for industrial processes, heat and transport). Therefore, as noted within the CWCC Inclusive Economy Strategy (2022), *“moving to green energy and the transition to net zero is both a major challenge and a top priority”* for the borough.
- 19.1.4. Therefore, the policy criteria should go further to consider the opportunities that large-scale mixed-use developments can provide in delivering low carbon energy and energy supplies. It is noted that the EN 1 criteria states that *“wherever possible, schemes should be located on previously developed land and/or in industrial areas and in areas close to existing users/demand or supplier of the energy, fuel and/or heat”*. The Commissioners considers that this should be amended to remove the prioritisation for low carbon energy development to be provided on previously developed land, and include reference to large-scale mixed-use allocations, which will ultimately be provided as part of the Local Plan, which should be considered as equally viable and deliverable as *“previously developed land and/or in industrial areas”* within the policy.

EN 4 - Do you agree with the suggested policy approach towards energy, as set out in EN 3 'Solar energy' above? If not please suggest how it could be amended?

- 19.1.5. The Commissioners is generally supportive of the policy approach towards solar energy provision, however, considers some amendments should be made to highlight the role that large-scale developments can play in providing solar energy as part of wider mixed-use proposals, and to ensure that much needed solar development can be delivered without onerous policy requirements.
- 19.1.6. From a national policy perspective, Paragraph 165 of the NPPF notes that Local Plans should *“maximise the potential for suitable [renewable and low carbon] development”*, including *“identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development”*.
- 19.1.7. Additionally, the CWCC Climate Emergency Response Plan (2020) notes that, to provide sufficient solar power to support the decarbonisation of the grid, *“a 25x increase in installed capacity”* is needed by 2050. The Commissioners considers that this clearly illustrates a demonstrable need for solar energy developments to be prioritised through the policies of the emerging Local Plan, without which, a transition to net zero will not be possible across Cheshire West and Chester.

## 19.2. Landscape Sensitivity Study and Guidance on Wind and Solar Photovoltaic Development (2016)

- 19.2.1. Cognisant of the above national and local position, the Commissioners considers that local policy should ensure solar developments can be delivered without delay. The Commissioners is concerned that solar proposals will be impacted by requiring such developments to be located in areas of least impact, as noted within the currently drafted Landscape Sensitivity Study and Guidance on Wind and Solar Photovoltaic Development (2016). This document was prepared prior to CWCC declaring a Climate Emergency in 2019, which the Commissioners considers has changed the context and need for low carbon energy sources.
- 19.2.2. The Commissioners supports the context set out in the Landscape Sensitivity Study and Guidance on Wind and Solar Photovoltaic Development (2016), insofar as it details the potential impacts development can have on the landscape, in line with Paragraph 165a of the NPPF. However, the Commissioners stresses that, if this is to be listed within policy, it should be updated to reflect the pressing need for low carbon energy in the borough. Furthermore, the Commissioners considers that, as currently drafted, the Landscape Sensitivity Study and Guidance on Wind and Solar Photovoltaic Development (2016) does not currently align with the emerging growth options of the borough, or wider CWCC documents such as the CWCC Inclusive Economy Strategy (2022) and the Climate Emergency Response Plan (2020) which again highlights the need for the document to be updated.
- 19.2.3. The Commissioners particularly disagrees with the onerous assessment of the Landscape Character 9 – Cheshire Plain West, which covers a significant area of land between Ellesmere Port and Malpas. As currently drafted, the Landscape Sensitivity Study and Guidance on Wind and Solar Photovoltaic Development (2016) notes that the Landscape Character Area (“LCA”) would be particularly sensitive to a medium, large or very large solar farms, and somewhat sensitive to small solar farms. The Commissioners considers that rendering this large area as unsuitable for solar development would significantly hinder the opportunity to “*maximise the potential for suitable [renewable and low carbon] development*” in line with national policy, and ultimately limit CWCC from meeting their net zero ambitions.
- 19.2.4. Furthermore, the Commissioners notes that areas within this LCA, such as their Site ‘Land South of Ellesmere Port’ have been included as the growth options within the emerging Local Plan, and therefore have been considered as potentially appropriate for development. Given this, the Commissioners stresses that the approach to the LCA’s should be revisited, in a current policy context, to ensure that any much-needed solar development is not precluded.

## 19.3. Solar Development on Greenfield Land

- 19.3.1. EN 3 notes that “*where development is proposed on greenfield land, the land around the structures should be used for livestock grazing, other agricultural use or another use beneficial to the environment or biodiversity. Use of agri-voltaics will be supported*”. The Commissioners is largely supportive of ensuring that solar development is provided in proximity to complementary green infrastructure uses, however given the increasing need to provide solar development, considers that this requirement should be amended to include the text “*where possible*”, which is used elsewhere within the criteria of EN 3. This will ensure that the Local Plan is “*maximis[ing] the potential for suitable [renewable and low carbon] development*” in line with national policy.
- 19.3.2. Additionally, the Commissioners notes the key role large-scale mixed-use developments can play in unlocking low carbon energy development within wider proposals, particularly on large greenfield sites such as the Commissioners’ Site ‘Land South of Ellesmere Port’, is currently not referenced within the EN 3 criteria.
- 19.3.3. Therefore, the Commissioners considers that text should be included within the solar development policy to highlight that support will be given to large-scale mixed-use developments that can provide low carbon energy, particularly where such developments can ensure solar development is co-located with “*uses beneficial to the environment or biodiversity*” such as high-quality green space and nature recovery areas.

## 19.4. Land South of Ellesmere Port

- 19.4.1. The Commissioners' Site provides a significant opportunity to provide much needed solar energy development and energy supplies as part of a wider large-scale mixed-use development, which is proposed within the Site Vision to be co-located with *"another use beneficial to the environment or biodiversity"*. An area of the Site has been identified under growth options 2 and 3 within the draft Local Plan, for a mixed-use development, and therefore is already considered potentially suitable for development. By providing low carbon energy in this strategic location as part of a wider mixed-use development, renewable energy could be provided to neighbours such as ORIGIN, Ellesmere Port Waste Water Treatment Works, HyNet, Stanlow, Cheshire Oaks and others. As mentioned previously, the Commissioners has been in conversation with such neighbours around the possibility of providing renewable energy in order to assist them in meeting their own net zero ambitions. Furthermore, as the Ellesmere Port Industrial Estate alone consumes 5% of UK energy for industrial processes, heat and transport, the Commissioners considers that the development of any low carbon energy in this location should be prioritised.
- 19.4.2. The Commissioners commissioned a Solar Energy Capacity Study for an area of their Site, to the east of the M53 in close proximity to the aforementioned neighbours, a layout plan is submitted in support of this submission detailing the possible location if the low carbon energy development. It is suggested that solar energy would be delivered as part of a wider mixed-use development on the Site, and would be co-located alongside nature recovery areas and improved green infrastructure. As noted previously within these Representations, the area of the Site to the east of the M53 is not currently identified within the draft Local Plan growth options. The Commissioner considers that their Site should be allocated wholesale, in order to ensure that any proposed development can unlock and provide much needed solar energy and collocated nature recovery and green infrastructure in an optimally located area which could assist in meeting *"a 25x increase in installed capacity"* to assist in decarbonising the grid, as well industrial neighbours in proximity meet their own net zero ambitions.

## 20. Miscellaneous

MISC 3 - Do you agree with the suggested policy approach towards waterways and mooring facilities, as set out in MISC 3 'Waterways and mooring facilities' above? If not please suggest how it could be amended?

- 20.1.1. The Commissioners is supportive of the suggested policy approach towards waterways and mooring facilities, particularly the suggestion of supporting *“development proposals adjacent to waterways that can provide positive regeneration benefits... in Ellesmere Port”* as well as improved *“public access and recreational use of the waterways”*.
- 20.1.2. The Commissioners agrees with the Ellesmere Port Places Background Paper (2024) insofar as it considers the presence of the Manchester Ship Canal as a considerable opportunity for improving the economy of the town, as well as the borough as a whole.
- 20.1.3. The Shropshire Union Canal, which links the canal systems of the West Midlands with the River Mersey and the Manchester Ship Canal, runs north to south through the Commissioners’ Site. As detailed through the Vision Document submitted alongside this Representation, the Site provides an opportunity to create a destination for canal side leisure and learning activities along a currently underutilised waterway asset. In addition, the Vision aims to utilise the canal to improve the links to the town centre by improving active travel routes along and to the Shropshire Union Canal. The Vision looks to activate the canal from the early stages of development, unlocking access to blue infrastructure in the area, and ultimately improving the health and wellbeing of new and existing Ellesmere Port residents.
- 20.1.4. As the Vision for the Site progresses, the Commissioners will continue to collaborate with the CRT to identify key interventions that could be successfully implemented along the Shropshire Union Canal.

# 21. Conclusion

- 21.1.1. This representation has been prepared on behalf of the Church Commissioners for England in response to the Cheshire West and Chester Council Local Plan – Issues and Options Regulation 18 Consultation 2025.
- 21.1.2. The Commissioners is generally supportive of the proposed scope of the emerging Local Plan and its overall ambitions underpinned by the challenges and opportunities of the region as highlighted within other CWCC documents such as the Plan for the Borough (2024-2028) and the Cheshire West and Chester Climate Emergency Response Plan (2020).
- 21.1.3. In conclusion, the Commissioners suggests the following pertinent points be taken forward in the Local Plan process:
- The Spatial Strategy and Settlement Hierarchy should ensure that development is balanced appropriately in order to best support the successful delivery of the housing need of the borough, prioritising the majority of development in proximity to existing established settlements such as the “*main town*” of Ellesmere Port. In addition to development in proximity to established “*main towns*” and the city of Chester, the Commissioners notes that consideration should also be given for development across smaller settlements and locations, to ensure that a genuine and considered choice of housing is provided for local people.
  - The emerging Local Plan should provide further, robust consideration for the provision of an appropriate mix of market-led housing across the district, in order to meet the objectively identified need of the growing population of Cheshire West and Chester, particularly in the context of the new standard method figure of **at least** 1,914 homes per annum. The Commissioners stresses the importance of ensuring the Local Plan is positively prepared, in line with the NPPF, and consider this will be achieved by utilising the standard method as a minimum housing need figure. This is of particular note, when considering that CWCC have been delivering housing in a surplus since 2014/15, suggesting that the current Local Plan housing target is not ambitious enough. In addition, the emerging Local Plan should also ensure it successfully addresses housing affordability issues through appropriately allocating a range of sites across the district that can viably deliver affordable housing as part of a larger sustainable development.
  - In order to ensure that the significant increase in Cheshire West and Chester's housing need can be met, cognisant of the limited availability of land outside the Green Belt, the Commissioners considers that CWCC should undertake a Green Belt Review. The Commissioners considers that many current designations predate major highway infrastructure, and specifically, that 'Land South of Ellesmere Port', now effectively separated from the wider countryside by the M53 and M56 motorways, no longer serves the purposes of Green Belt protection as defined in the NPPF. Therefore, with particular reference to 'Land South of Ellesmere Port', large-scale greenfield sites that no longer serve the purposes of the Green Belt should be released, and subsequently allocated for development.
  - The Commissioners suggests further flexibility should be given with regards to land use around solar development on greenfield sites, in order to ensure that much needed low-carbon development can be delivered. Rather than requiring the land around solar development to be utilised as mandatory agricultural or environmentally beneficial uses, consideration should be given to the co-location of solar with green spaces and nature recovery areas which can be delivered as part of large-scale sustainable communities.

- 21.1.4. The Commissioners suggests that consideration be given to their Site as submitted to the CWCC as part of the Call for Sites exercise within the Land Availability Assessment – Stage One Consultation (2024), as a unique, mixed-use development to provide a new sustainable community to the south of the Ellsemere Port. The Site is readily available to be delivered and is located in a sustainable location that provides an ideal opportunity to holistically masterplan for a sustainable development that would create a range of new homes to deliver a truly mixed community, with considerable employment, recreation, low carbon energy and green infrastructure opportunities.
- 21.1.5. A new allocation comprising the Site **in its entirety** and subsequent development of a new sustainable community will help to fulfil the emerging housing and economic objectives of CWCC, as well as aspirations around addressing climate change and sustainability by optimising opportunities for sustainable development that helps meet a range of needs in the district.



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