

Representations to Cheshire West & Chester Local Plan Issues and Options Consultation (Regulation 18)

On behalf of Barratt Redrow

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1. Introduction

- 1.1. Pegasus Group has been instructed on behalf of their client, Barratt Redrow, to prepare representations to the Cheshire West & Chester Issues and Options Local Plan Consultation (Regulation 18), which ran between 4th July and 29th August 2025. These representations cover Redrow's, David Wilson's and Barratt's Green Belt interests in the Borough.

Introducing Barratt Redrow

- 1.2. Barratt Redrow Plc is the UK's largest housebuilder and is comprised of three nationally recognised high-quality brands: Barratt Homes, David Wilson Homes and Redrow. As a company, Barratt Redrow delivered 16,500 homes last year and have built over 680,000 homes across the country in the last 60 years.
- 1.3. With three offices across the North West region, Barratt Redrow have a well-established presence, operating within 43 North West Local Authorities, with Cheshire West and Chester being a key area for the business.
- 1.4. Not only does Barratt Redrow build in great volume, but it has a long history of, and an award-winning reputation for the delivery of the highest quality development. Barratt Redrow are committed to the highest standards of design, sustainability, construction and customer service which has allowed them to achieve HBF 5 Star Status every year since 2009, more than any other housebuilder. Barratt Redrow were also the only UK-based housebuilder to feature in TIME and Statista's World's Most Sustainable Companies in 2025, highlighting their commitment to environmental sustainability.
- 1.5. Barratt Redrow's unique brand portfolio provides homes for people at all stages of life, including first time buyers, families and downsizers. There are key differentiations between the brands, including the product range and character, which allow Barratt Redrow to create balanced communities and deliver high quality developments that meet the objectives of good urban design. Delivering multiple brands on site provides the customer with a high degree of choice and ultimately allows Barratt Redrow to build out faster, speeding up delivery and helping Local Planning Authorities to meet their housing needs.

Redrow's Land Interests

- 1.6. The Council will be aware through the submission of previous representations/call for site submissions in March 2024 that Redrow has a number of land interests across CW&C, which they are actively promoting for residential allocation in the emerging Local Plan. At the outset, we provide a summary of the sites below, to provide context for the remainder of our representations.

Lache Lane/Wrexham Road Extension, Chester (Site CH03)

- 1.7. Land at Lache Lane/Wrexham Road Extension comprises the north-eastern section of Growth Area CH03, as identified at Map 5.4 of the Issues and Options Consultation Paper. It comprises **6.8 ha** of agricultural land located immediately south of the Kings Moat Garden Village development (see **Figure 1**), which is currently being built out by Redrow and Taylor Wimpey.

Figure 1 – Lache Lane/Wrexham Road Extension, Chester Site Location & CH03 Growth Area



- 1.8. The Council will be aware that Redrow has an interest in the wider land parcel, known as Decoy Farm (which covers the entire CH03 potential growth area), through their previous promotion of the site through the call for sites exercise. Following the previous submissions made to the March 2024 call for sites consultation, updated technical information has been prepared for what represents the logical first development phase of the site (noting its

Grey Belt credentials, as well as being a logical extension to Kings Moat Garden Village). Whilst this first phase is the focus of these representations, noting the Borough's substantial housing needs and strong demand in Chester, it is considered that Green Belt release will also likely be required to extend to the A55 to the south.

1.9. A Delivery Statement for the site and highways technical note are contained at **Appendix 1**. In summary, the submitted technical information confirms that:

- The site can deliver around 160 homes and associated green infrastructure (as shown at **Figure 2** below). This includes a 20 metre wide linear park that connects to the proposed green link from Kings Moat Garden Village local centre.

Figure 2: Lache Lane/Wrexham Road Extension, Chester Illustrative Masterplan



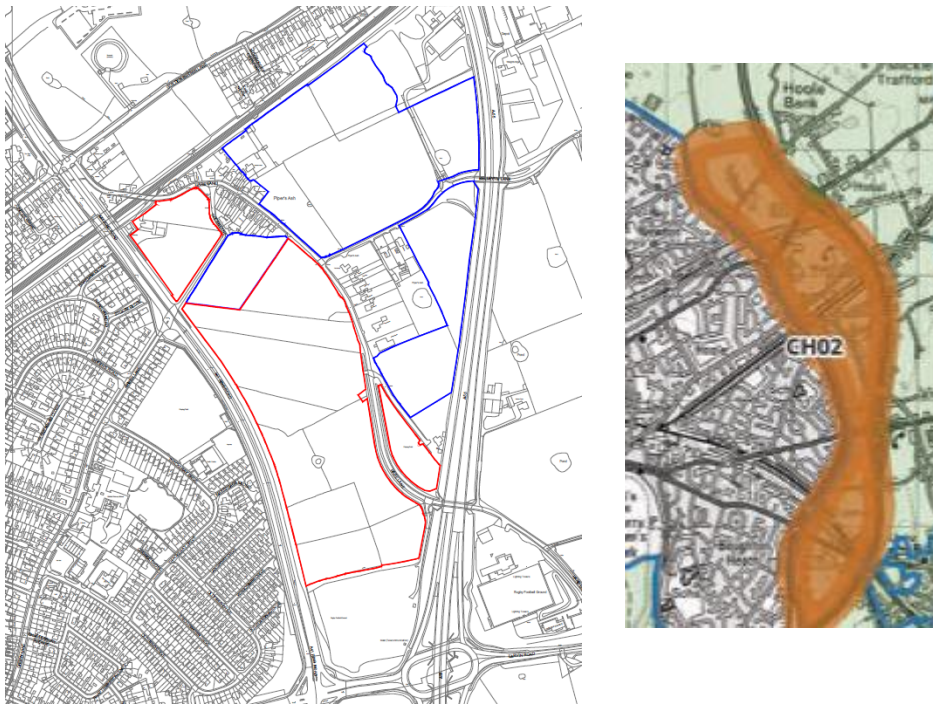
- Access to the site will take via the currently consented and substantially built out Land at Wrexham Road/Kings Moat Garden Village site, part of which is being developed by Redrow. One of the adjacent internal estate roads will be extended to provide access into the site. The site access, and the internal road network, will be designed to meet adoptable highways standard.
- The site is wholly deliverable, with no technical constraints preventing it coming forward for residential development.

- The site will deliver a number of benefits, including much needed market and affordable housing and construction and operational economic benefits (job creation and increased GVA).
- The site does not provide a strong contribution to purposes A (weak), B (no contribution) and D (weak) of the Green Belt and there are no footnote 7 exclusions which would restrict development. The site therefore meets the definition of Grey Belt, as defined in Annex 2 of the NPPF.

Hare Lane, Chester (part of CH02)

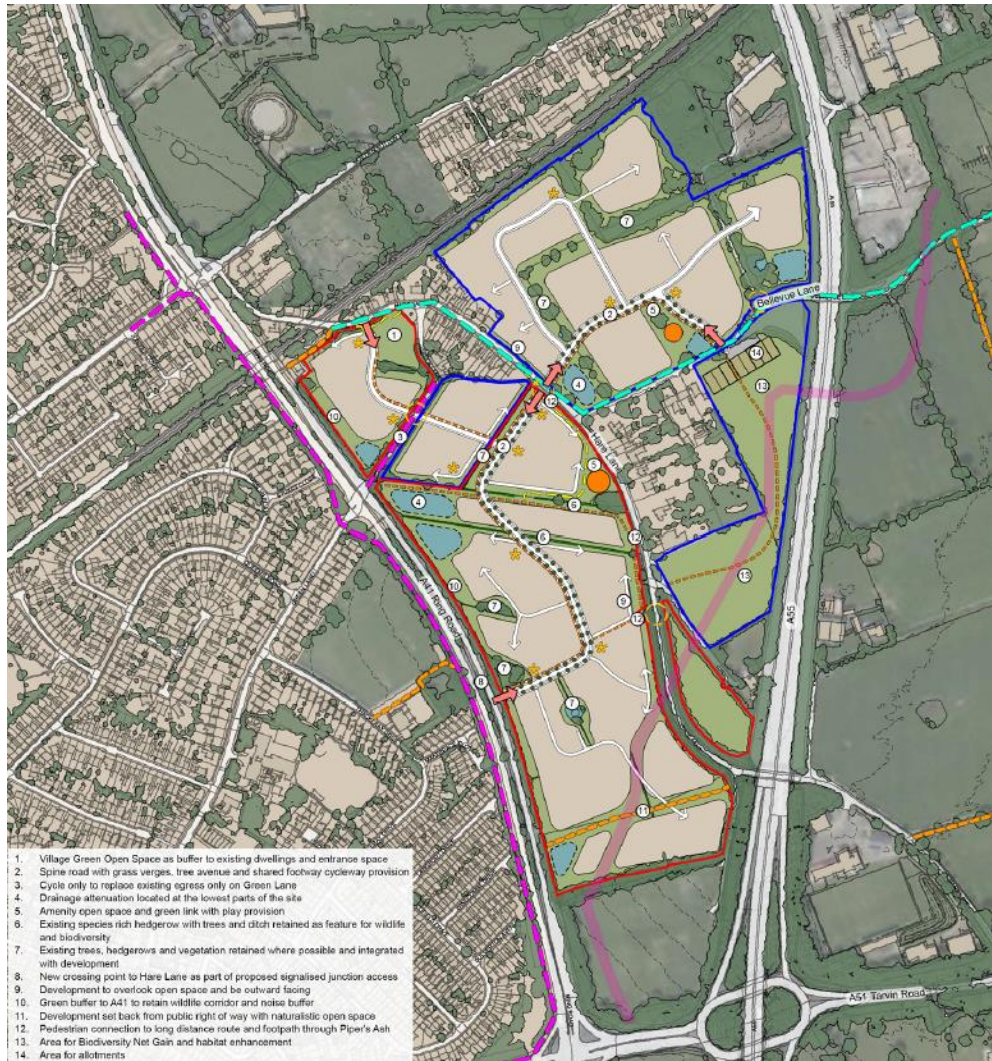
- 1.10. Hare Lane comprises the central section of potential growth area CH02, as identified at Map 5.4 of the Issues and Options Consultation Paper. This site comprises **29.34 Ha** of agricultural land located to the east of Chester, between Hare Lane and the A41 Ring Road (see **Figure 3** below).

Figure 3 – Hare Lane, Chester Site Location & CH02 Growth Area



- 1.11. Following the previous submissions made to the March 2024 call for sites consultation, updated technical information for the site has been prepared, including an updated Development Framework Plan. These reports are contained at **Appendix 2**. In summary, the additional technical information confirms that:
- The site can deliver around 560 homes and associated green infrastructure, including potential allotments (as shown at **Figure 4**).

Figure 4 – Hare Lane, Illustrative Masterplan

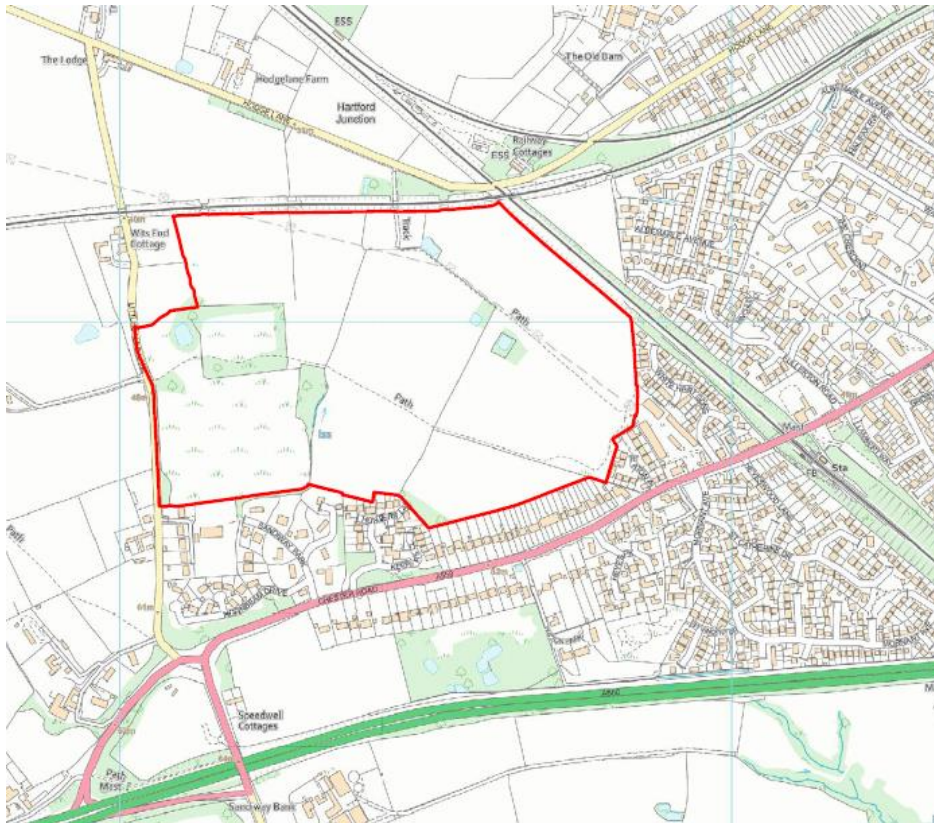


- Access to the main (western) site parcel will take via the A41 to the west, in the form of a new traffic signal-controlled junction. Access will be taken via Hare Lane for the smaller (northern/eastern) land parcel.
- The site is wholly deliverable, with no technical constraints preventing it coming forward for residential development.
- The site will deliver a number of benefits, including much needed market and affordable housing and construction and operational economic benefits (job creation and increased GVA).
- The site does not provide a strong contribution to purposes A, B and D of the Green Belt and there are no footnote 7 exclusions which would restrict development. The site therefore meets the definition of Grey Belt, as defined in Annex 2 of the NPPF.

Land at Chester Road, Hartford (Site NOR09)

- 1.12. Land at Chester Road, Hartford comprises the vast majority of potential growth area NOR09, as identified at Map 5.6 of the Issues and Options Consultation Paper. The site measures **34 Ha** of agricultural land located to the north of Chester Road, Hartford (see **Figure 5** below).

Figure 5 – Chester Road, Hartford Site Location & NOR9 Growth Area

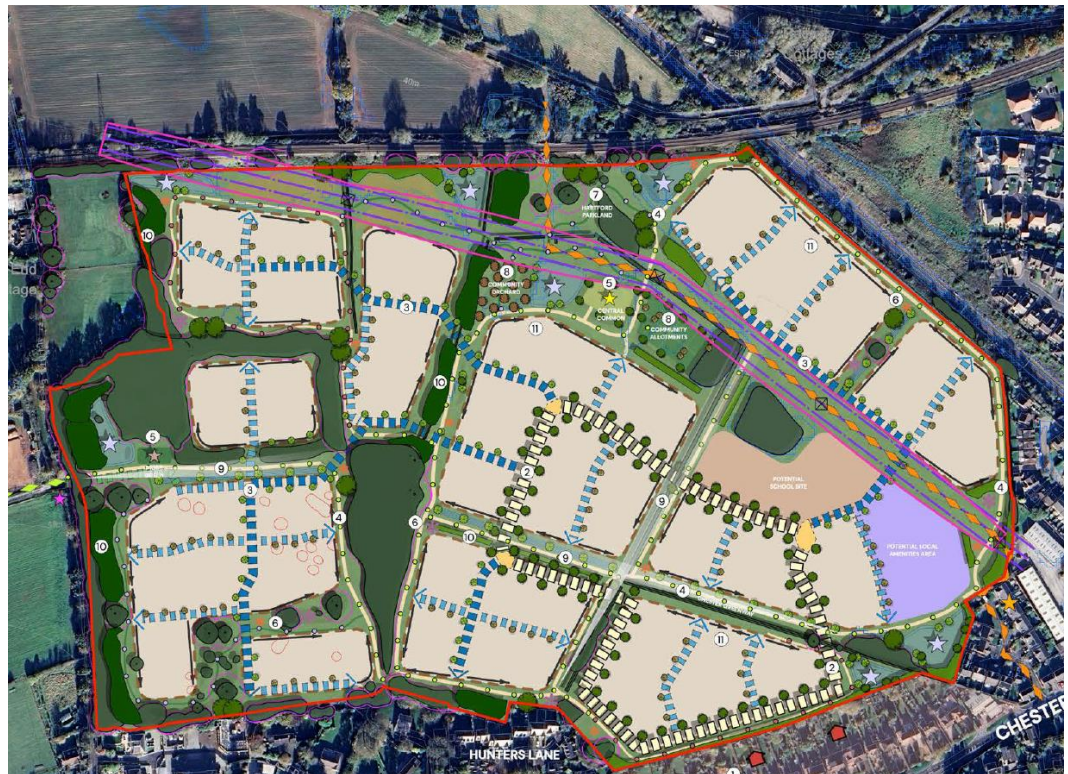


- 1.13. Following the previous submissions made to the March 2024 call for sites consultation, updated technical information for the site has been prepared, including an updated

Development Framework. These reports are contained at **Appendix 3**. In summary, the additional technical information confirms that:

- The site has capacity to deliver circa 580 new homes, as well as potential for a new school and local amenities area, as shown at **Figure 6** below.

Figure 6 – Land at Chester Road, Hartford Illustrative Masterplan



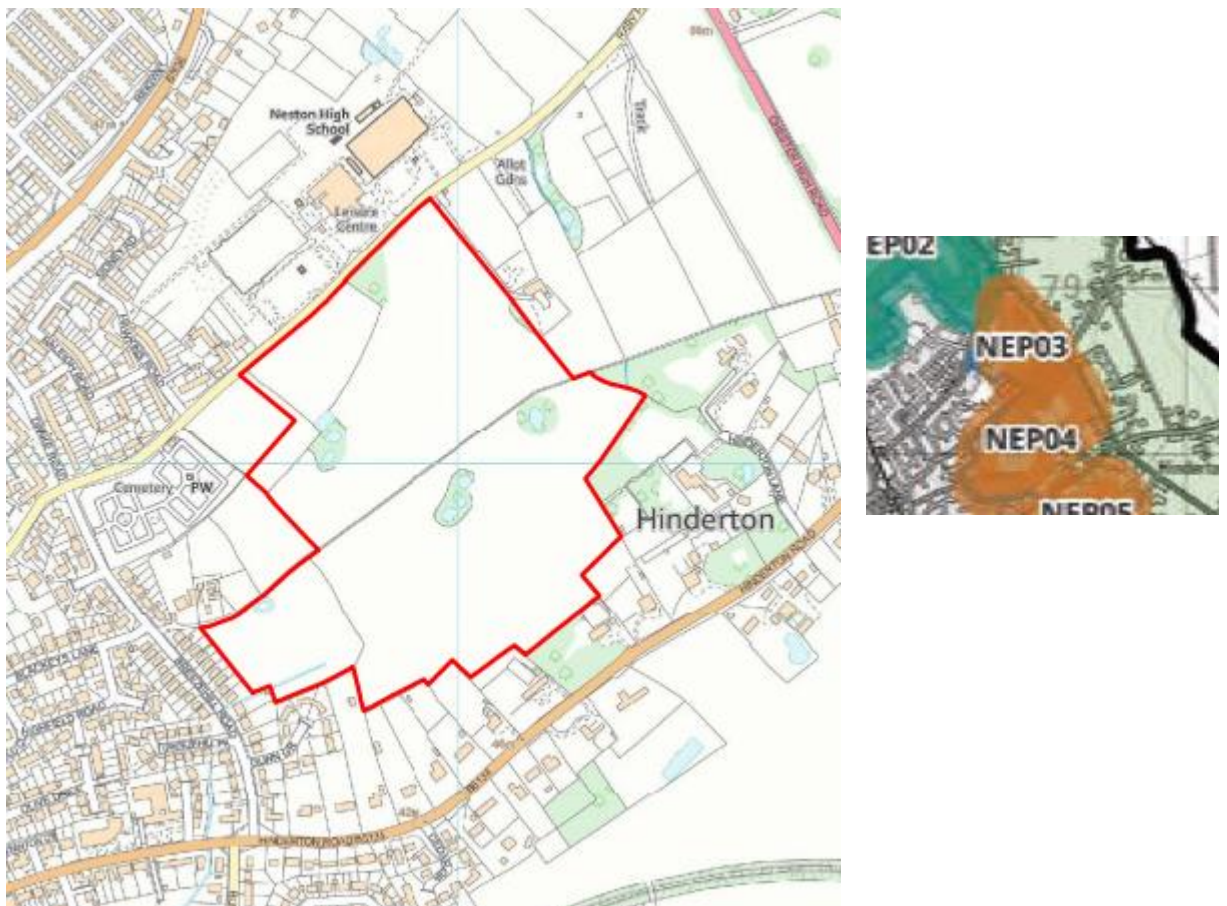
- The site will deliver significant areas of green infrastructure on site, including a Parkland area, community allotments, community orchard and various other areas of infrastructure, including 'Central Common' and formal play facilities.
- There are a number of potential locations where access can be taken via Chester Road to the south.
- The site is wholly deliverable, with no technical constraints preventing it coming forward for residential development.
- Can deliver 10% biodiversity net gain on site.
- The site will deliver a number of benefits, including much needed market and affordable housing and construction and operational economic benefits (job creation and increased GVA). Furthermore, the provision of a new potential primary school and local amenities area on site will provide a number of social and infrastructure benefits to the local community.
- The site does not provide a strong contribution to purposes A (weak), B (no contribution) and D (no contribution) of the Green Belt, there are no footnote 7

exclusions which would restrict development, and the site can meet all ‘Golden Rules’. The site therefore meets the definition of Grey Belt, as defined in Annex 2 of the NPPF.

Raby Park Road, Neston (Site NEP04)

- 1.14. Land at Raby Park Road comprises the western section (approximately 2/3rds) of potential growth area NEP04, as identified at Map 5.14 of the Issues and Options Consultation Paper. The site comprises **18 Ha** of agricultural land, located to the south of Raby Park Road and to the east of Neston (see **Figure 7** below).

Figure 7 – Land at Raby Road, Neston Site Location & NEP04 Growth Area



- 1.15. Following the previous submissions made to the March 2024 call for sites consultation, updated technical information for the site has been prepared, including an updated Development Framework. These reports are contained at **Appendix 4**. In summary, the additional technical information confirms that:
- The site has capacity to deliver circa 400 new homes, alongside significant levels of green infrastructure – including potential allotments, a Central Green, a LEAP and a LAP. This is shown at **Figure 8**.

Figure 8 – Land at Raby Park Road, Neston Illustrative Masterplan

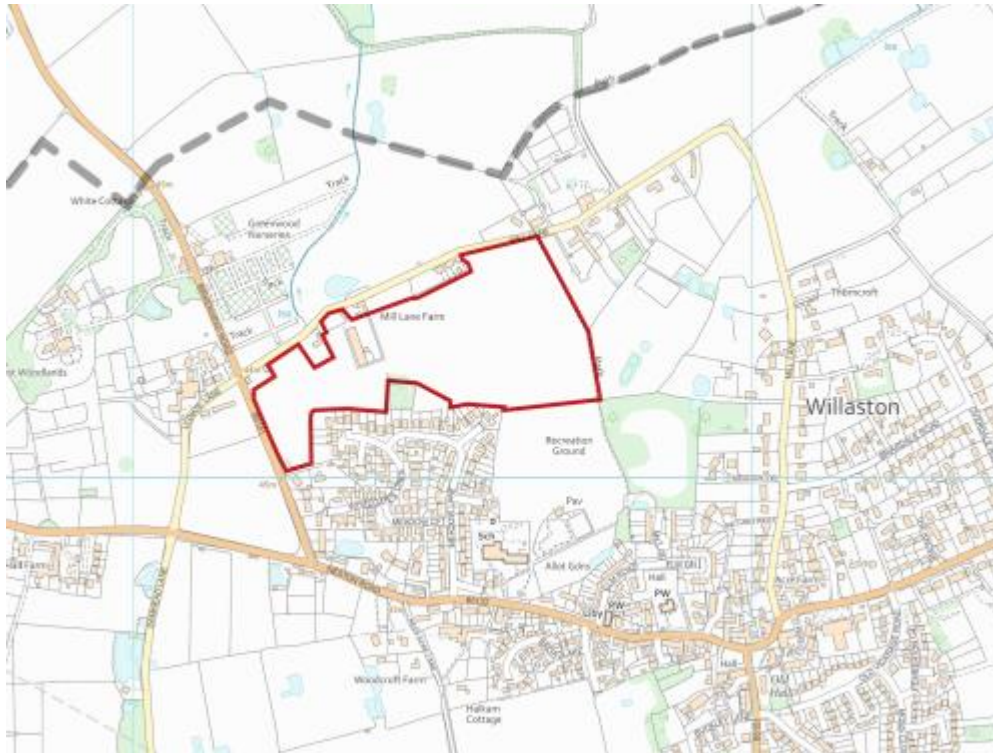


- Access to the site will be taken via Raby Park Road to the north, in the form of two priority access junctions.
- The site is wholly deliverable, with no technical constraints preventing it coming forward for residential development.
- 10% biodiversity net gain can be delivered on site. The site can also deliver substantial gains in respect of hedgerow and watercourse units – with all trading rules satisfied.
- The site will deliver a number of benefits, including much needed market and affordable housing and construction and operational economic benefits (job creation and increased GVA).
- The site does not provide a strong contribution to purposes A, B and D of the Green Belt, there are no footnote 7 exclusions which would restrict development, and the site can meet all 'Golden Rules'. The site therefore meets the definition of Grey Belt, as defined in Annex 2 of the NPPF.

Mill Lane, Willaston

- 1.16. The site comprises **9.6 Ha** of agricultural land located south of Mill Lane, Willaston (see **Figure 9** below), and is not identified as a potential growth area in the Issues and Options Consultation Paper, as this does not consider growth options in Willaston or any of the other currently defined 'Local Service Centres' (LSCs).

Figure 9 – Mill Lane, Willaston Site Location



- 1.17. Following the previous submissions made to the March 2024 call for sites consultation, updated technical information for the site has been prepared, including an updated Development Framework. These reports are contained at **Appendix 5**. In summary, the additional technical information confirms that:

- The site has capacity to deliver circa 160 new homes, alongside significant levels of green infrastructure. This includes existing agricultural land at the eastern section of the site, which will be made available for informal recreation and where a network of accessible paths is proposed. This is shown at **Figure 10**.

Figure 10 – Mill Lane, Willaston Illustrative Masterplan

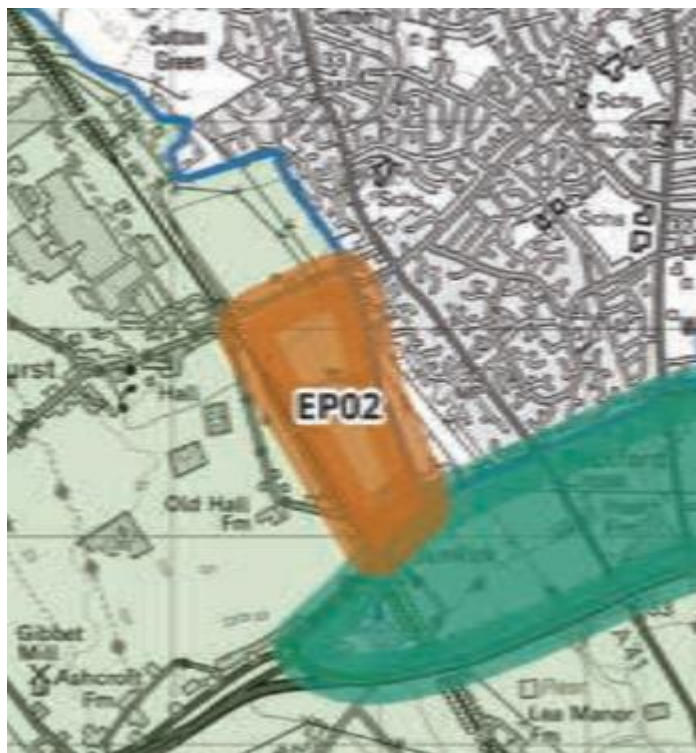
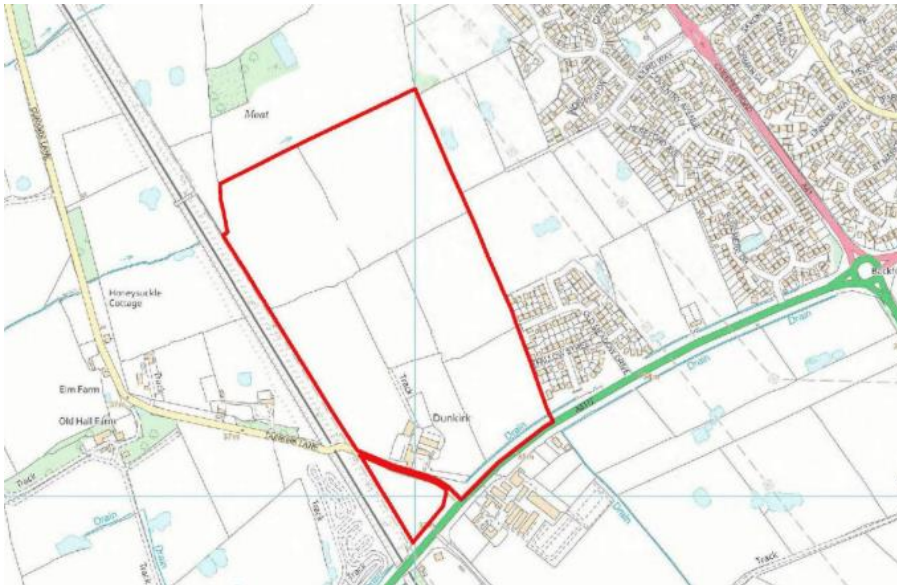


- Access to the site will be taken via Birkenhead Road to the west, in the form of a simple priority junction.
- The site is wholly deliverable, with no technical constraints preventing it coming forward for residential development.
- 10% biodiversity net gain can be delivered on site. Indeed, the site proposes significant areas of green and blue infrastructure, securing extensive biodiversity enhancement.
- The site will deliver a number of benefits, including much needed market and affordable housing and construction and operational economic benefits (job creation and increased GVA).
- The site does not provide a strong contribution to purposes A (no contribution), B (no contribution) and D (no contribution) of the Green Belt, there are no footnote 7 exclusions which would restrict development, and the site can meet all 'Golden Rules'. The site therefore meets the definition of Grey Belt, as defined in Annex 2 of the NPPF.

Dunkirk Farm, Ellesmere Port

- 1.18. Dunkirk Farm comprises the south-western extension of potential growth area EPO2, as identified at Map 5.5 of the Issues and Options Consultation Paper. The site comprises **23 Ha** of agricultural land, located to the north of Dunkirk Way and to the east of Ellesmere Port (see **Figure 11** below).

Figure 11: Dunkirk Farm, Ellesmere Port Site Location



- 1.19. The Council will be aware that as part of the March 2024 call for sites consultation, Redrow submitted a Development Framework for the site. This is contained at **Appendix 6**,

alongside additional technical reports (highways, trees, ecology and Planning/Green Belt note) which confirm that:

- The site has capacity to deliver circa 550 dwellings and associated green infrastructure. This is shown at **Figure 12** below.

Figure 12: Dunkirk Farm Illustrative Masterplan



- Access to the site will be taken via Dunkirk Way to the south, in the form of a priority junction (which includes potential for an active travel arrangement, with cyclists given priority via a raised crossing). A secondary access point can also provide connectivity between the two main development parcels.
- The site is wholly deliverable, with no technical constraints preventing it coming forward for residential development.
- 10% biodiversity net gain can be delivered on site.

- The site will deliver a number of benefits, including much needed market and affordable housing and construction and operational economic benefits (job creation and increased GVA).
- The site does not strongly contribute to purposes a), b) or d) of the Green Belt and meets the definition of Grey Belt (as outlined at Annex 2 of the NPPF).

1.20. Redrow continue to actively promote all sites for housing allocation as part of the emerging Local Plan process.

David Wilson’s Land Interest

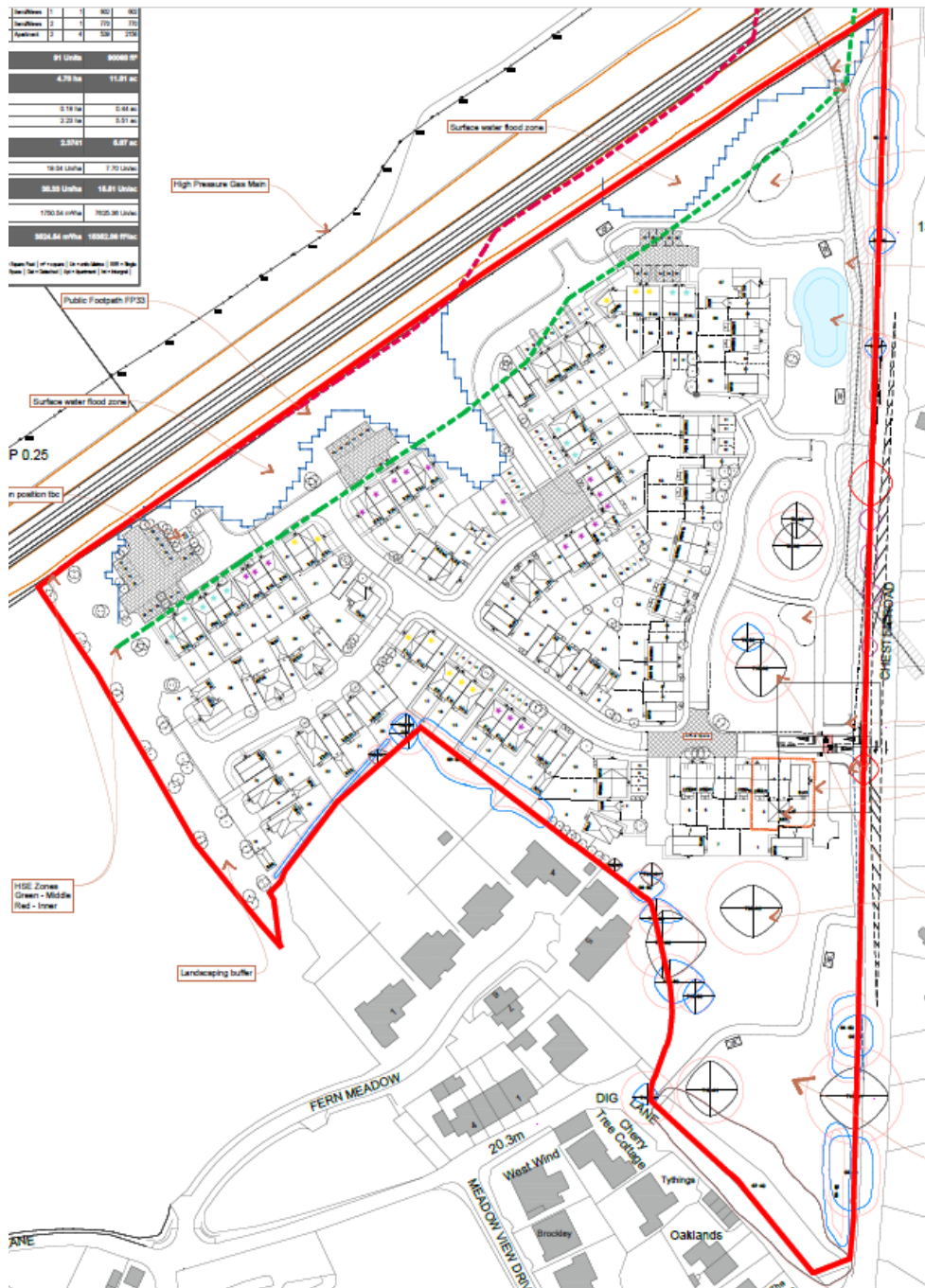
1.21. David Wilson is actively promoting land at Dig Lane, Frodsham for housing allocation. The site comprises 4.78 hectares of land which forms the eastern extent of potential growth area FRO03 (see **Figure 13** below).

Figure 13: Dig Lane, Frodsham Site Location



- 1.22. As shown on the Site Layout contained at **Appendix 7**, and replicated at **Figure 14**, the site can deliver 91 homes and associated green infrastructure, including local areas of play (LAPS).

Figure 14: Dig Lane, Frodsham Site Layout



- 1.23. It is important to note that a detailed planning application (reference: 25/O2109/FUL) for the development of 91 homes on this site is currently pending determination. This further demonstrates the deliverability of the site – which has an ability to deliver early in the plan period and can make an immediate contribution to the Council’s five-year housing land supply.

- 1.24. Turley has prepared site-specific representations in respect of Dig Lane, which demonstrate the deliverability of the site and should be read in conjunction with these overarching representations.

Barratt's Land Interest

- 1.25. Barratt is actively promoting land at Sandy Lane, Weaverham for housing allocation. The site comprises circa 16.12 hectares of agricultural land which forms part of potential growth area NOR11 (see **Figure 15** below).

Figure 15: Sandy Lane, Weaverham Site Location & Illustrative Masterplan



- 1.26. As shown in further detail on the Illustrative Masterplan contained at **Appendix 8**, the site can deliver around 330 homes, significant green infrastructure and a Skate Park.
- 1.27. Savills has prepared site-specific representations in respect of Sandy Lane, which demonstrate the deliverability of the site and should be read in conjunction with these overarching representations.

Representation Structure

1.28. Following this introductory section, these Representations are structured as follows:

- **Section 2** – covers the Local Plan’s Introduction (Local Plan Chapter 1)
- **Section 3** – comments on the Plan’s Vision & Objectives (Chapters 2 & 3)
- **Section 4** – covers Sustainable Development and Policy SD1 (Chapter 4)
- **Section 5** – comments on the Spatial Strategy in respect of Housing Needs (Chapter 5)
- **Section 6** – comments on the Spatial strategy in terms of the Settlement Hierarchy & Spatial Options (Chapter 5)
- **Section 7** – covers the Chester Growth Areas and Policy CH1 (Chapter 6)
- **Section 8** – covers the Ellesmere Port Growth Areas and Policy EP 1 (Chapter 7)
- **Section 9** – covers the Northwich Growth Areas and Policy NO 1 (Chapter 8) and also discusses the growth strategy around Winsford
- **Section 10** – covers the Neston & Parkgate Growth Areas and Policy NP 1 (Chapter 11)
- **Section 11** – reviews other relevant policies in the plan (Chapters 13 – 27)
- **Section 12** – draws together our overall conclusions

2. Local Plan Introduction (Plan Chapter 1)

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?

- 2.1. Paragraph 1.19 of the consultation paper confirms that the Council consider the following additional evidence will be required in support of the 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)
- 2.2. Barratt Redrow fully support the list above, in particular the Green Belt Study. As set out throughout these representations, it is clear from the Issues and Options Paper and wider evidence base that Green Belt release will be required in order to meet emerging development requirements, therefore early preparation of a Green Belt Study is supported and welcomed. It is also important that this Study is comprehensive in its scope and considers Green Belt across the authority area, rather than just around Chester, as the previous Green Belt Study did in 2013, in support of the current adopted plan.
- 2.3. The Housing Needs Assessment, Strategic Viability Assessment and Land Availability Assessment are also critical to the emerging strategy for housing delivery, and therefore we would expect these to have progressed/ been published by the time of the next consultation stage.
- IN 2: Do you have any comments on what the monitoring framework should include?***
- 2.4. It will be critical for the monitoring framework within the plan to closely monitor housing land supply at regular intervals. NPPF paragraph 34 is clear that policies in local plans should be reviewed to assess whether they need updating at least once every five years. Due to CW&C's significant housing requirements (which as a minimum will comprise the local housing need figure of 1,928 dwellings per annum¹), it is important for housing delivery

¹ Latest calculation as a result of latest affordability ratios (published March 2025) and housing stock data (published May 2025).

to be regularly monitored and appropriate trigger points inserted into the monitoring framework in respect of a potential early Local Plan Review.

- 2.5. We reserve the right to comment on this matter further as the Local Plan progresses and the evidence base in respect of land supply and proposed allocations becomes available.

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

- 2.6. At paragraph 1.23, it is noted that the Council think that the updated Local Plan should plan for a period of 15 years. Paragraph 22 of the NPPF notes that strategic policies should look ahead over a **minimum** 15-year period from adoption. NPPF paragraph 22 also states that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery.

- 2.7. A range of site sizes will be required in order to meet housing requirements, ranging from small, medium to larger sites. The Local Plan should therefore consider extending beyond the minimum 15-year period, potentially to 20 years as per the current Local Plan, to help ensure plan-led development on larger sites across the main settlements of Chester, Ellesmere Port, Northwich and Winsford.

- 2.8. ***IN 4: Do you have any comments on the initial SA/SEA that accompanies the new Local Plan Issues and Options?***

- 2.9. At Table 5.2, the SA contains a high-level assessment of spatial options A, B and C against key objectives – which score the same against all objectives, with the following (not all) notable exceptions:

- Option A (Retain the Green Belt) scores worse (amber) than the other two options (green) in respect of ‘infrastructure – reducing the need to travel and encouraging sustainable modes of transport’.
- Options B (current LP level and distribution) and C (sustainable transport corridors) score worse (red) in respect of conserving and enhancing the historic environment objective. The red scoring relates to Green Belt release in Chester – which we respond to in more detail under Question SS 10.
- Options B & C score better than option A under climate change and reduction of air pollution objectives.

- 2.10. As we explain throughout these representations, it is considered that a hybrid approach will be required in order to sustainably meet housing requirements. No spatial option in isolation will be sufficient, and a dispersed spatial strategy (both Green Belt and non-Green Belt options) will be required across the Borough. Clearly, the SA also takes a very high-level approach, when in reality, development and allocations should be settlement capacity and site-led, to deliver the best and most suitable options for development across the plan area.

2.11. In respect of the settlement specific policies (Chester – CH 1, Northwich – NO 1 etc) assessed in the SA, we do not have any particular comments to make at this stage, given allocations have not yet been formally identified or assessed.

2.12. Due to the early stage of the Local Plan making process, we note the SA (and Consultation Paper) at this stage only refer to delivery of a minimum of 1,914 dwellings per annum. As required at NPPF paragraph 36, Local Plans must be justified – taking into account reasonable alternatives. One such alternative will be to explore a higher growth option which is higher than the standard method figure, which is a minimum starting point².

IN 5: Do you have any comments on the HRA screening that accompanies the new Local Plan Issues and Options?

2.13. No comments at this early stage, in the absence of site-specific assessments, but we reserve the right to make further comments as the Local Plan progresses and more detailed HRA assessments are published.

IN 6: Do you have any comments on what role Neighbourhood Plans should play in terms of meeting Cheshire West's development needs and other suggested policy approaches for the new Local Plan? This could include things like meeting housing needs, local connection tests, or design etc.

2.14. Barratt Redrow is supportive of the Neighbourhood Plan process and the role it plays in delivering community led development, however it is important to note that Neighbourhood Plans should not promote less development than set out in strategic policies for the area, or undermine those strategic policies.

2.15. In light of this, and the increased development needs in the emerging Local Plan, all current Neighbourhood Plans within CW&C will need to be reviewed and updated to ensure they do not undermine the delivery of this growth.

² NPPF paragraph 62 states: To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning practice guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

3. Vision & Objectives (Chapters 2 & 3)

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

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

- 3.1. Barratt Redrow believe that the overarching principles must include reference to meeting current and future development needs including the delivery of market and affordable housing of all types, as this is a critical issue within Cheshire West and is also critical to delivery of the other principles listed, most notably 'promoting wellbeing' and 'providing infrastructure'.

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?

- 3.2. Barratt Redrow has no issue in principle with establishing concise visions for each of the key places identified, as long as these are not overly prescriptive and include a level of flexibility, and we reserve the right to make further comments once these visions are drafted.

- 3.3. To ensure no unnecessary delays and to avoid any potential delivery concerns, it is considered that Developers who are promoting land in these key places should be consulted on the visions as part of the Local Plan process.

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

- 3.4. In respect of the objectives, we support the HBF position that whilst the Council may take inspiration from the objectives of the current Local Plan and the Sustainability Appraisal, that it should prepare objectives specific to this Plan, that address the issues and challenges that are current in Cheshire West, including acute housing need as noted above.

4. Sustainable Development – Policy SD1 (Chapter 4)

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?

- 4.1. Barratt Redrow is supportive of the general principles of Policy SD 1, with the only comment at this stage being the importance of the need for flexible wording. At times, the current wording of Policy SD 1 reads as stringent, and it is important to recognise that there may be site-specific instances where all of the criteria cannot be met. We therefore recommend the first sentence of the policy is amended as follows:

"New developments must, where feasible and relevant"

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

- 4.2. It is not considered that district heat networks should be a requirement on strategic sites. The potential use of such networks can be appropriately considered as part of the energy strategy for each individual site and should be considered on a site-by-site basis.
- 4.3. Indeed, we echo the sentiments of the HBF of this matter, who highlight that over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery, but at the moment, one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost.
- 4.4. It is therefore considered that heat networks requiring the installation of low-carbon technologies will remain uneconomic for the foreseeable future. As such, district heat networks are not a feasible and viable option on strategic sites.

5. Spatial Strategy – Housing Needs (Chapter 5)

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

5.1. Barratt Redrow support the Council’s clarification (at bullet point 1, page 22) that:

“The new Local Plan must plan to meet the government’s housing target (the standard method number) which was revised in December 2024. The Council has no choice in this.”

5.2. Indeed, Paragraph 62 of the December 2024 NPPF makes it clear that the local housing need figure represents the minimum number of homes required. The latest standard method (SM) figures have recently been updated following the publication of the latest affordability ratios in March 2025 and 2024 housing stock data (published May 2025). The latest SM for CW&C is now 1,928 dpa, which equates to 28,920 dwellings over a 15 – year period (or 38,560 over a 20–year period).

5.3. In light of the recent data, CW&C therefore need to plan for a minimum of **1,928 dwellings** per annum³.

5.4. On behalf of Barratt Redrow and Taylor Wimpey, Lichfields has prepared an Objectively Assessed Housing Need Research Paper for CW&C. This report is contained in full at **Appendix 8**, however in summary:

- The Consortium urges CWaC to adopt a **minimum** housing target for the new local plan period derived from the standard method figure of 1,928 dpa.
- There are potentially significant economic benefits of pursuing at least the 1,928 dpa figure which will not be realised if a lower requirement is set, including:
 - Over £340m in capital investment p.a.;
 - Over 10,000 FTE direct and indirect construction jobs p.a.;
 - Almost £950 million in economic output p.a.;
 - £22m in resident expenditure p.a.; and
 - Council Tax revenue of £4.3m p.a.
- The economic benefits associated with pursuing a more positive economic growth-led housing requirement would be even higher.
- CWaC's population is projected to grow at a faster rate than any of its neighbouring authorities as well as relative to the wider regional and national projected growth

³ We note the Council’s latest ‘Housing Land Monitor Summary Report 2025’ sets out a requirement of **1,912 dpa**, which was correct at the base date of 1st April 2025, but has since changed with the 2024 housing stock data (published May 2025) to 1,928 dpa, which is the latest figure that should be used for the purposes of the emerging Local Plan.

rates. This presents a need to ensure that sufficient housing is provided so that this growth potential is not constrained.

- There is a case to deliver at least 2,169 dpa, based on a scenario which aligns economic growth and housing needs in line with the Cheshire and Warrington Local Enterprise Partnership growth aspirations.

5.5. In summary, there are no circumstances in which the Local Plan should not deliver the minimum 1,928 requirement, and in order to achieve the Borough's full potential, a scenario which aligns economic and housing growth generates a requirement to deliver at least 2,169 dpa.

SS 2: Do you think the Council should consider a stepped housing requirement that plans for a lower level of housing deliver earlier in the plan period?

5.6. Barratt Redrow do not support a stepped/staggered approach to housing delivery over the plan period. An even distribution of delivery throughout the plan period is achievable when a mixture of small, medium and large sites are appropriately allocated.

5.7. Furthermore, CW&C has an acute 5 year housing supply shortfall, with their latest 'Housing Land Monitor Summary Report 2025' confirming a supply of just **1.9 years** at 1st April 2025 (see footnote 3 below), equating to a shortfall of **6,250 homes** by 2030. As such CW&C will actually require elevated delivery within the early years of the plan period to address this shortfall, and must encourage this within the emerging plan. The Council should also support early applications on suitable and deliverable sites, in line with the latest NPPF guidance (including Grey Belt development).

6. Spatial Strategy – Settlement Hierarchy & Spatial Options (Chapter 5)

Spatial Strategy Principles

- 6.1. Policy SS 3 (spatial strategy principles) outlines how the spatial strategy will follow the principle of directing new development and allocating land towards previously developed sites within settlements first. Where there are not enough planning permissions and opportunities for redevelopment within urban areas and towns, the approach will be to develop on the edge of existing settlements in locations with the best access to public transport and existing services and infrastructure. The policy concludes that this may require the release of Green Belt land.

SS 4: Do you agree with the suggested policy approach towards the spatial strategy principles, set out in SS 3? If not, please suggest how it could be amended?

- 6.2. Barratt Redrow fully supports the suggested policy approach outlined at Policy SS 3. There is insufficient previously developed land (and land generally) within existing settlement boundaries to meet CW&C’s substantial housing requirements alone, as confirmed by a five year housing supply of just 1.9 years (which equates to a shortfall of 6,250 homes), meaning undeveloped land on the edge of existing settlements (urban extensions) will be required, with preference rightly given to the most sustainable locations.
- 6.3. To achieve sustainable development patterns in line with the established settlement hierarchy, this will logically require a level of Green Belt release alongside Open Countryside development, given that a number of high performing, sustainable settlements (such as Chester, Ellesmere Port and Northwich which are the three largest settlements at the top of the settlement hierarchy) are surrounded or impacted by Green Belt. In addition, other settlements with access to key services, including Frodsham, Neston and Parkgate and some Key Service Centres, are also constrained by Green Belt but are equally suitable and sustainable locations for growth. Therefore, there will clearly be a need to release Green Belt land in order to deliver sustainable development at the levels required in the Borough.
- 6.4. This approach is entirely consistent with NPPF paragraph 148, which states:
- “Where it is necessary to release Green Belt land for development, plans should give priority to **previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.** However, when drawing up or reviewing Green Belt boundaries, **the need to promote sustainable patterns of development** should determine whether a site’s location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.”*
- 6.5. In light of this, and as we discuss in further detail below, Spatial Option A (Retain the Green Belt) is not considered feasible and should be ruled out, as it would generate unsustainable development patterns. This position is further reinforced by recent changes to national planning policy in respect of Grey Belt (as discussed elsewhere in the Framework at

paragraphs 155 & 156), which categorically recognises the importance Grey/Green Belt sites make in tackling the national housing crisis.

Settlement Hierarchy

SS 5: Do you agree with the suggested policy approach towards the settlement hierarchy, as set out in SS 4? If not please suggest how it could be amended?

- 6.6. Policy SS 4 states that the new Local Plan will set out a settlement hierarchy, based on their status and role in providing local infrastructure and services for their relatively larger populations and the surround hinterland, for the following places:
- Chester (city)
 - Ellesmere Port (main town)
 - Northwich (main town)
 - Winsford (main town)
 - Neston and Parkgate (market town)
 - Frodsham (market town)
- 6.7. It is then noted that individual, place-based policies for each settlement will set what development will take place in each of these settlements.
- 6.8. Taking each relevant settlement in turn, Barratt Redrow **support the retention of Chester as a city and Northwich as a main town**, as these are the first and third largest settlements in the Borough respectively and are already at the top of the adopted settlement hierarchy. To avoid unnecessary repetition, Chester's continuing status as the principal settlement (and only city) in CW&C is undisputed.
- 6.9. In respect of Northwich (which incorporates Hartford and Weaverham), we reiterate some of the key sustainability credentials (of the wider town and the Chester Road site/ NOR09 potential growth area), which are set out in the 2024 Places Background Paper and discussed in our previous representations:
- Northwich had a population of 54,700 residents in the 2021 census, which equates to 15.3% of the Borough's population.
 - Northwich has a good retail and leisure offer in the Town Centre and Barons Quay and a number of Local Centres in the surrounding settlements, with Hartford considered a healthy centre with a Sainsburys and Coop, 2 train stations and good bus connections, which are directly accessible to this site.
- 6.10. It is therefore entirely justified to retain Northwich as a main town in the emerging settlement hierarchy, which is very well placed to accommodate a higher proportion of growth given its high level of sustainability.
- 6.11. Barratt Redrow also **support the retention of Ellesmere Port as a main town**, noting that (as per the 2024 Places Background Paper and our previous representations):

- Ellesmere Port is the Borough's second largest settlement with 65,400 residents in the 2021 census, which equates to 18%. The age profile shows that the highest percentage of residents are between 55 and 59, suggesting an ageing population, that the Council may seek to rebalance by increasing the provision of housing targeted at younger families.
- Ellesmere Port is home to numerous local services and facilities both in the Town Centre, Cheshire Oaks and a number of outlying Local Centres.
- Ellesmere Port is well served by social and community infrastructure – including a Hospital, GP practices, pharmacies, primary schools and secondary and special educational needs schools.
- Ellesmere Port is well served by public transport with a Railway Station which provides access to Liverpool (two services an hour), and regular bus services which link across Cheshire, with good bus accessibility.

6.12. Barratt Redrow also **fully support the elevation of Neston and Parkgate to a market town** from its current status as a Key Service Centre in the adopted Local Plan. This is entirely justified given the sustainability credentials of the settlement, which are set out in the 2024 Places Background Paper and discussed in our previous representations:

- Neston & Parkgate is the largest of all current Key Service Centres – with a population of 15,400 in the 2021 census (equating to 4.9% of the Boroughs population).
- Neston Town Centre is in good health, with a good number of convenience uses and a growing food and drink offer.
- Neston also has a number of primary schools, a High School, Doctors and Railway Station.

6.13. Notwithstanding the settlement hierarchy and settlement statistics, Neston is already a Market Town in an official sense, having been granted a royal charter in 1728, with a weekly market that continues to this day, and this status is confirmed on the Town Council's website⁴.

6.14. The settlement is therefore very well placed to accommodate additional development, as reflected by the Council's intention to elevate it to a market town higher up in the settlement hierarchy.

6.15. Barratt Redrow also **support the elevation of Frodsham to a market town** from its current status as a Key Service Centre in the adopted Local Plan. Similar to Neston & Parkgate, this is justified by the 2024 Places Background Paper which notes that:

- Frodsham had a population of 9,100 residents in the 2021 census, which equates to 2.6% of the Borough's population.

⁴ <https://neston.org.uk/community/about-neston/local-history/history-of-the-villages/>

- Frodsham town centre has a good retail and leisure offer, home to national chains and independent retailers.
- Has four primary schools, excellent transport links (Railway Station and Bus Services) and a GP practice and Medical Centre.

6.16. In addition, and as with Neston, Frodsham is already an official market town, having been chartered in the 13th century and still having a regularly weekly market today, as noted on the Visit Cheshire website⁵.

6.17. Policy SS 4 then notes how the following settlements have a level of facilities and services that mean they can meet the day-to-day needs of their residents and those living in surrounding areas:

- Cuddington and Sandiway
- Farndon
- Helsby
- Kelsall
- Malpas
- Tarporley
- Tarvin
- Tattenhall

6.18. Depending on the spatial strategy option selected for the new Local Plan, the consultation paper notes that these settlements may be amended, and we reserve the right to make further comments at that point.

6.19. Whilst not defined within emerging policy SS 4, all of these settlements are currently designated as Key Service Centres in the adopted Local Plan. For the avoidance of doubt, it is considered that future versions of the Local Plan should clarify that these settlements will be retained as Key Service Centres (or have equivalent status in the new plan).

6.20. Barratt Redrow support the continued identification of **Cuddington and Sandiway** as a Key Service Centre, noting that (as per the 2024 Places Background Paper and our previous representations):

- Cuddington Railway Station provides direct access to Manchester and Chester.
- The settlement has two Local Retail Centres within it, Mere Lane and Norley Road, which together include a diverse mix of retail premises, focusing on convenience retail. There are also other facilities including a library, dentist and primary school.

⁵ <https://visitcheshire.com/other-towns-villages/frodsham>

- 6.21. Policy SS 4 then states that it is recognised that smaller settlements which have a lower level of services and access to public transport could acceptably accommodate infill development and small previously developed sites to meet local needs. No reference is currently made to the existing Local Service Centres identified in the adopted Local Plan.
- 6.22. The Council will be aware of our previous representations in respect of the settlement of **Willaston**, which is currently a Local Service Centre in the adopted Local Plan. It is our strong view that not only should Willaston be identified within in the settlement hierarchy, it should also be upgraded to a Key Service Centre in light of the following sustainability credentials:
- Willaston had a population of 2,470 in 2021, representing a large Local Service Centre. The Key Service Background Paper (July 2013), which forms part of evidence base for the adopted Local Plan, provides an assessment of the Key Service Centres in the Borough. Willaston has a larger population than the Key Service Centres of Farndon and Malpas, and a comparable population bracket (2,000–3,000) to four other Key Service Centres.
 - The age profile of Willaston shows that the highest percentage of residents are between 70 and 79 suggesting an ageing population, that the Council may seek to rebalance by increasing the provision of housing targeted at younger families.
 - Within the Local Plan Local Service Methodology evidence document (January 2016), Willaston scores highly within detailed settlement assessment with a score of 4 out of 4. The assessment confirms the settlement has access to a range of community, education and shopping facilities, alongside bus services, providing a broad mix of local services for residents day to day needs.
 - Willaston benefits from good public transport connectivity. Bus stops are located throughout the village, including Neston Road. The number 272 and 22 provides direct access to Ellesmere Port and Chester respectively.
 - A variety of facilities are available within Willaston village, including a primary school, a pharmacy, local convenience store, sport facilities and other shops/restaurants to serve a range of needs.
- 6.23. In conclusion, we are generally supportive of the settlement hierarchy as set out at policy SS 4, particularly the elevation of Neston & Parkgate and Frodsham to Market Towns. However, we also feel there is strong justification to elevate **Willaston** from **a Local Service Centre to a Key Service Centre (or equivalent)** for the reasons set out, as it is a sustainable settlement that is well placed to accommodate higher levels of growth.
- SS 6: Should all settlements have some level of development, regardless of whether they are identified in the settlement hierarchy?***
- 6.24. The suitability and sustainability of each settlement needs to be considered on a case by case basis. In some instances, it may be appropriate to rely on windfall development, whereas in other settlements which can support higher levels of development due to existing services and amenities, planned growth (i.e. Local Plan allocations) should be pursued.

SS 7: Do you think the new Local Plan should contain place-based policies for smaller settlements such as: Cuddington and Sandiway; Farndon, Helsby; Kelsall; Malpas; Tarporley; Tattenhall; and Tarvin?

- 6.25. It is considered that allocations for smaller settlements can be dealt with in a similar manner to adopted policy STRAT 8 of the Part 1 Local Plan, which sets out the minimum housing required for each settlement.
- 6.26. If place based policies are to be pursued, we would ask that they are not overly prescriptive and include sufficient flexibility to allow for changing local circumstances over the course of the plan period.

SS 8: Do you agree that in smaller settlements, the character should be protected and development should not exceed the capacity of existing services and infrastructure?

- 6.27. Barratt Redrow support developments in smaller settlements that are in keeping with the scale and character of the settlement and have existing service and infrastructure capacity, or the ability to increase capacity through service and infrastructure improvements (including Active Travel links).
- 6.28. This position is supported by NPPF paragraph 83, which states under the heading rural housing:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”

- 6.29. This is relevant to Willaston, should this remain a Local Service Centre (or equivalent status) as it has both the existing and potential capacity (in terms of services and infrastructure) to accommodate additional development.
- 6.30. Indeed, the Land at Mill Lane site is sustainably located and will enhance the vitality of Willaston, in line with the requirements of NPPF paragraph 83. This is outlined in full detail in the updated Development Framework contained at **Appendix 5**, which confirms that:
- A development of circa 160 homes at Mill Lane will not have an adverse impact on the existing highway network in respect of capacity.
 - The site is well located to existing sustainable travel options, with bus stops located within a 400m along Mill Lane and Neston Road. The number 272 and 22 service operates off Mill Lane and provides direct access to Ellesmere Port and Chester respectively.
 - Active travel points can also be provided to the wider area, including onto Mill Lane and onto the existing public right of way to the east.
 - A variety of other facilities are also located within an 800m radius of the site within Willaston, including a primary school, a pharmacy, local convenience store, sport facilities and other shops which can be accessed by pedestrians and cyclists.

- 6.31. It is Barratt Redrow's strong view that Mill Lane, Willaston is a suitable and sustainable location for residential development, in line with NPPF paragraph 83. It should therefore be allocated for residential development in the emerging Local Plan.

Spatial Strategy Options

- 6.32. Policy SS 5 (spatial strategy options) sets out three initial options for growth, identified as follows:

- Option A – Retain the Green Belt
- Option B – Follow current Local Plan level and distribution of development
- Option C – Sustainable transport corridors

- 6.33. The consultation paper is clear that each option had a range of benefits and disadvantages and are illustrative only, indicating the possible pattern and scale of development.

- 6.34. The diagram base map gives a visual impression of where growth might take place but does not identify specific locations or sites for development. All options are stated to be capable of accommodating at least 29,000 new homes and 149 hectares of employment land, however in reality, Option A is unable to as it is simply not realistic or sustainable to deliver all of the Borough's development requirements on non Green Belt land.

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

- 6.35. Yes – strong exceptional circumstances exist to justify Green Belt release. CW&C's housing requirements has increased significantly since the adoption of the Local Plan (Part One) in 2015, from **1,100 dpa to 1,928 dpa** (an increase of 75% and an extra 828 homes per year, 12,420 homes across a 15 year period, and 16,560 across a 20 year period).
- 6.36. The previous plan required a level of Green Belt release around Chester to meet its needs, so it follows that the emerging plan will need significant additional Green Belt release in line with increasing needs, and this is borne out by the evidence, most notably a five year housing supply of just **1.9 years** (which equates to a shortfall of 6,250 homes).
- 6.37. This is coupled with the need to achieve sustainable development patterns in line with the established settlement hierarchy, which will require Green Belt release alongside Open Countryside development, given that a number of high performing, sustainable settlements (such as Chester, Ellesmere Port and Northwich which are the three largest settlements at the top of the settlement hierarchy) are surrounded or impacted by Green Belt.
- 6.38. NPPF paragraph 146 is clear that exceptional circumstances for a review of Green Belt boundaries includes (amongst other matters), instances where an authority cannot meet its identified need for homes. There is therefore clear justification to release suitable land from the Green Belt as part of the emerging Local Plan.
- 6.39. Accordingly, Spatial Option A (retaining the Green Belt as is), is simply not credible and must be discounted, as it would constrain growth and generate unsustainable settlement patterns.

SS 10: Are there any other considerations that we should take account of in relation to future Green Belt policy?

6.40. We note that Policy SS 5 refers to the examiner's report into the Local Plan (Part One) in 2015, which concluded that:

"additional release of Green Belt land around Chester would have a significant adverse effect on the purposes of including land within the Green Belt including to the historic setting, and that the amended Green Belt boundary proposed was capable of enduring and would not need to be altered at the end of the plan period (2030)."

6.41. As noted above in the response to SS 9, circumstances have changed significantly since 2015, with a 75% increase to the housing requirement in the authority area; and wider changes to the NPPF that include the introduction of 'Grey Belt' land, which must be considered in respect of Green Belt release in the emerging Local Plan.

6.42. The introduction of Grey Belt policy in the December 2024 NPPF is reflective of national government's commitment to tackle the housing crisis. Green/grey belt land will play a critical role in delivering this aim. In short, for a site to be considered Grey Belt, it must not strongly contribute to purposes a), b) or d) of the Green Belt, the latter of which relates to 'preserving the setting and special character of historic towns'. Whilst other criteria/tests also need to be satisfied in order to be considered Grey Belt, it is clear that a balanced view needs to be taken, which is moving away from the blanket protection of all Green Belt land. The change in approach is also reflected at NPPF paragraph 148 in respect of plan-making:

"Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework"

6.43. CW&C must carefully consider the Grey Belt tests when preparing the Local Plan, particularly in respect of growth around Chester, given this is the principal settlement in the authority area, and this will require a balanced and nuanced judgment in respect of purpose d) in particular.

6.44. In short, it is our strong view that the above changes in Green Belt policy, and the substantial housing requirements, justify Green Belt release and supersede/ override the previous Inspector's position that Chester's Green Belt boundary would not need to be altered at the end of the current plan period (2030).

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

- a. **Option A – Retain the Green Belt**
- b. **Option B – Follow current Local Plan level and distribution of development**
- c. **Option C – Sustainable transport corridors**
- d. **None of these**

6.45. We do not support any of these options in isolation, please see response to SS 12 below.

6.46. We note the HBF also agree that no option will be suitable in isolation – suggesting that positive elements of each approach should be taken forward, including supporting the vitality of smaller settlements, but also supporting the development of land within or adjacent to the larger settlements where developments are likely to be more sustainable.

SS 12: Do you have any alternative spatial strategy options that you would like to suggest?

6.47. Barratt Redrow consider a hybrid of Options B and C will provide the most appropriate/sustainable approach in respect of the spatial distribution of development. We have already noted under question SS 9 that Option A is not appropriate.

6.48. Barratt Redrow advocate a hybrid option which would follow the general distribution from the current Local Plan but also take account of the revised settlement hierarchy – as set out at Policy SS 4. It would also incorporate the general ethos of Option C, however; should be site-led and widened to focus on sustainability and accessibility in the round, including Active Travel, instead of being solely focused on sustainable transport corridors.

6.49. Indeed, the Planning Inspectorate recently hosted a webinar⁶ entitled '*what is meant by a sustainable location?*'. Key points of note include reiterating the fact that walking and cycling are at the top of the sustainable transport hierarchy, followed by public transport. Whilst public transport connectivity/corridors are clearly important, it should not be the sole focus. Instead, the site selection process for each settlement should also heavily focus on a site's location and it's pedestrian and cycle connectivity to existing local amenities (shops, schools etc), which all reduce car trips on a day to day basis. Public transport is clearly helpful for longer distance trips, but has to be considered alongside the aim to reduce day to day trips to local facilities. This highlights the issue with Option C's overreliance/focus on public transport, as although places like Delamere and Mouldsworth have train stations, they do not have primary schools which are a key focus of day to day trips. This therefore does not represent a balanced approach to sustainability, which is more nuanced and multi-faceted.

6.50. It is considered a hybrid option of Option B and C is the most appropriate spatial strategy because:

- It would still facilitate the brownfield first approach to development, as enshrined in national policy, across the authority area;
- It would deliver both non Green Belt and Green Belt sites in the most sustainable locations;
- It would result in a more even spatial distribution across settlements, and not lead to an over-concentration of development in certain locations. This will deliver a number of benefits, including variety of choice and tackling affordability issues across the Borough;

⁶ <https://www.youtube.com/watch?v=yTKYHTffS80>

- Would reflect recent changes in Green Belt policy, specifically Grey Belt, and the key role Green Belt sites will play in delivering development requirements; and
- Is settlement capacity and site led, which will provide the most sustainable and suitable spatial distribution of development for the Borough.

SS 13: Aside from those settlements identified in the spatial strategy options, should new housing or other development be allowed in other settlements? If so, please specify what type of development? For example, infill etc?

6.51. Please see our response to question SS 6 and SS 8 confirming our general support for development in smaller settlements where capacity exists, including Willaston, and the land at Mill Lane site, which we have demonstrated to be a suitable and sustainable site that will infill and round off of the existing settlement, and should be considered for allocation in the emerging plan on this basis.

SS 14: Do you feel that Option A is an appropriate spatial strategy for the new Local Plan?

6.52. No, we reiterate that Option A will not meet CW&C's emerging development requirements and would result in uneven and unsustainable development patterns, by concentrating all growth outside the Green Belt and away from the authority area's largest and most sustainable settlements (including Chester and Northwich).

SS 15: If you do not feel that Option A is an appropriate spatial strategy option, are there any changes that you could suggest?

6.53. No, we think it should be removed entirely, and that the plan should focus on a hybrid of Options B & C as noted.

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

SS17: If you do not feel that Option B is an appropriate spatial strategy option, are there any changes that you could suggest?

6.54. Option B recognises that larger areas of Green Belt and/or countryside are likely to be needed in comparison to the current Local Plan, which Barratt Redrow fully support. For housing development it includes:

- Large urban extensions around: Chester; Ellesmere Port; Northwich and Winsford. Accompanying Map 5.2 indicates 5,000 + homes in Chester, Ellesmere Port and Northwich.
- Total Green Belt release of sites to deliver 11,000 homes.
- Development in Cuddington and Sandiway; Farndon; Frodsham; Helsby; Kelsall; Malpas; Neston and Parkgate; Tarporley; Tarvin; and Tattenhall of 3,000 homes in total. Map 5.2 indicates up to 500 homes in these settlements.
- 2,500 homes across the rest of the rural area, including both Green Belt and non-Green Belt land.

- 6.55. Barratt Redrow is supportive of the general principles of Option B, particularly the need for both non Green Belt and Green Belt allocations and urban extensions around Chester. However; as explained under question SS 12, Barratt Redrow advocate a hybrid approach combining elements of Options B & C.
- 6.56. Willaston should also be identified as a Key Service Centre, as justified under question SS 5.

SS 18: Do you feel that Option C is an appropriate spatial strategy for the new Local Plan?

SS 19: If you do not feel that Option C is an appropriate spatial strategy option, are there any changes that you could suggest?

- 6.57. Option C would see new homes focused in and around settlements on the railway network, and on main bus route corridors (based on those routes with a bus service of at least one per hour). For housing development, it includes:
- *A more distributed pattern of development.*
 - *More modest urban extensions around: Chester; Ellesmere Port; Northwich; and Winsford*
 - *Smaller settlements with a rail station, such as: Cuddington and Sandiway; Helsby; Frodsham; and Neston and Parkgate would take a bigger role in accommodating development.*
 - *Total Green Belt release of sites to deliver more than 12,000 homes.*
 - *Potential for further development in the rural area and in places along bus corridors including: Farndon; Malpas; Tarporley; Tarvin; and Tattenhall.*
 - *Potential for an enhanced role around rural rail stations including: Acton Bridge; Capenhurst; Delamere; Elton; Hooton; Lostock Gralam; and Mouldsworth.*
- 6.58. As highlighted under question SS 12, Barratt Redrow advocates a hybrid approach which would combine elements of spatial Options B and C. In respect of Option C, this should be amended to focus on overall sustainability, in recognition that walking and cycling (i.e. Active Travel) are at the top of the sustainable travel hierarchy, above public transport). We highlight the following key points in this respect:
- Covid has changed travel patterns, with working from home increasingly becoming the norm. Walking and cycling to local amenities is becoming even more important in this context, with less day to day reliance on public transport for longer distance.
 - The aforementioned PINS webinar highlights that improvements to pedestrian routes is the key/top priority to make meaningful modal shift changes.
 - The PINS webinar also highlights the importance of context, high frequency bus routes are not always realistic/feasible in smaller settlements. It is Barratt Redrow's view that this does not make a development unsustainable with a site's pedestrian and cycle connectivity to local amenities being more important.

- NPPF paragraph 110 also recognises the above, noting that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

6.59. In light of the above, and in line with NPPF paragraph 83 which notes how planning policies should identify opportunities for villages to grow and thrive, Option C needs to be widened to focus on sustainability in a more holistic manner. Growth should not be solely focused on high frequency public transport corridors and railway stations, as this alone will not achieve genuine modal shift to sustainable travel modes. Proximity to other day to day local amenities, including schools, is equally important.

Potential Growth Areas

6.60. Section 5.1 of the consultation paper notes how it may be necessary to identify new areas or broad locations for development if not enough land can be identified within settlements. A series of maps of 'potential growth areas' on the edge of the city, main towns, market towns and larger villages are then presented, which we comment on further in subsequent sections of this representation.

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

6.61. No particular comments in respect of those listed at paragraph 5.12, other than to echo the HBF's comment that not all of the list provided are showstoppers, rather, some elements (such as flood risk) just need careful consideration in respect of masterplanning and how development is delivered on site.

SS 21: What information should we take into account when assessing sites for allocation in the new Local Plan?

6.62. Sites must be demonstrated to be developable, sustainable and deliverable, in line with the NPPF definitions and PPG Guidance.

SS 22: Do you have any other comments or suggestions you wish to make about our approach to identifying potential growth areas or allocations in the new Local Plan?

6.63. Overall, we welcome the identification of potential growth areas as a proactive measure to seek to address the significant emerging housing needs within CW&C.

7. Chester Growth Areas and Policy CH1 (Chapter 6)

7.1. This section covers questions in respect of Chester Growth Areas (SS 23 – SS 25) and Chester Policy CH1 (QCH1-10).

SS 23: Which of the identified potential growth areas around Chester do you consider to be the most suitable?

7.2. Barratt Redrow fully support Chester receiving the highest level of growth in the emerging plan, as it did in the adopted plan, where it was and remains the largest settlement and only City at the top of the settlement hierarchy. As such we support spatial Option B in respect of Chester (which proposes 5000+ homes), and note that if the previous local plan apportionment (5,200 of 22,000 or 23.64%) is applied to the emerging 15 year requirement of 29,000 then Chester would receive growth of **6,855 homes**, which seems entirely reasonable and deliverable, with the 4 potential growth areas shown having a total indicative capacity of 11,980.

7.3. Whilst the final development numbers for Chester will be refined as the Local Plan progresses, Barratt Redrow fully support the identification of potential growth areas **CHO3 (Lache Lane)** and **CHO2 (Land at Hare Lane)** on Map 5.4 at this stage of the plan process, and consider that these two areas are suitable options for housing allocation in Chester because:

7.4. In respect of **CHO3**, Redrow's Land at Lache Lane/Wrexham Road Extension site, which is located at the north-eastern extent of CHO3, represents a logical first development phase of CHO3 as:

- It comprises a Grey Belt site which can deliver development of circa 160 dwellings in the first five years of the plan period.
- It is unconstrained in respect of all technical considerations.
- It benefits from a sustainable location, located directly adjacent to Kings Moat Garden Village, which is being built out by Redrow and Taylor Wimpey.

7.5. Whilst Land at Lache Lane/Wrexham Road Extension can be delivered in isolation, the wider CHO3 parcel (known as Decoy Farm) – which extends to the A55 to the south, represents a logical rounding off to the Green Belt boundary and is a suitable broad location for growth. It does not provide a strong contribution to the historic setting of Chester and purpose d) of the Green Belt. It is considered that this entire CHO3 growth area will be required to meet Chester's and CW&C's substantial housing requirements. The entire CHO3 parcel has capacity to deliver around 1,200 homes.

7.6. In respect of **CHO2**, Redrow's site at Land at Hare Lane is a highly suitable residential site as:

- It comprises a Grey Belt site which can deliver development of circa 560 dwellings early on in the plan period.

- It is unconstrained in respect of all technical considerations.
- Benefits from a highly sustainable location for growth, with various facilities and services located within walking distance.

7.7. Again, whilst Land at Hare Lane can be delivered in isolation and as an early development phase, it will not undermine the delivery of the wider CHO2 site – which is also appropriate for Green Belt release in its entirety. When reviewing Green Belt boundaries in this location, releasing the land parcels located between the A55 and A41 is entirely logical, noting the requirement of NPPF paragraph 149 in respect of the need to identify clear, permanent boundaries. The A55 clearly comprises a durable Green Belt boundary.

7.8. This is equally the case in respect of the CHO3 Growth Area – which also benefits from strong, durable boundaries including the A55 to the south and a railway line to the west. The same cannot be said for growth areas CHO1 and CHO4, which have less durable boundaries and are more open in character.

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

7.9. No comments at this stage.

SS 25: Are there any constraints, including infrastructure provision, that should be considered for Chester when developing the new Local Plan?

7.10. Barratt Redrow do not have any particular comments to make at this stage.

Policy CH 1 (Chester)

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

7.11. Policy CH 1 notes how the new Local Plan will set out the level and location of new development with protection of the historic environment and special character of the city remaining the priority.

7.12. Barratt Redrow is wholly supportive of this approach, and the need to protect the historic character of the city, whilst at the same time delivering sustainable development in the right location. As explained earlier in this section, Land at Lache Lane and Land at Hare Lane can deliver this aim, without adversely impacting the historic character/setting of Chester, particularly in light of recent updates to the NPPF and NPPG in respect of Grey Belt land.

CH 2: Do you have any comments on the suggested allocations/sites, set out above?

7.13. The suggested allocations relate to employment only, therefore no comments at this stage.

7.14. Barratt Redrow do not have any comments in respect of questions CH 3 – CH 10.

8. Ellesmere Port Growth Areas and Policy EP 1 (Chapter 7)

8.1. This Section covers questions in respect of Ellesmere Port Growth Areas (SS 26 – SS 28) and Ellesmere Port Policy EP 1 (questions EP 1 – EP 2).

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

8.2. Barratt Redrow support the high levels of growth suggested for Ellesmere Port under Options B (5,000+homes) and C (3,000–5,000 homes), noting that if the previous local plan apportionment (4,800 of 22,000 or 21.81 %) was applied to the emerging 15-year requirement of 29,000 then Ellesmere Port would receive growth of **6,325 homes**, which seems entirely reasonable and proportionate.

8.3. Whilst the final development numbers for Ellesmere Port will be determined as the Local Plan progresses, Barratt Redrow fully support the identification of potential growth area **EPO2 (Dunkirk Farm)** on Map 5.5 at this stage of the plan process. This potential growth area is the most suitable option for housing allocation in Ellesmere Port because, as discussed in more detail in the Development Framework and other technical reports contained at **Appendix 6**:

- It will deliver much needed homes (around 550) in a sustainable location – with a number of facilities located within walking distance from the site, including bus services, a local pharmacy and primary school.
- It is unconstrained in respect of all technical considerations and can deliver 10% biodiversity net gain on site.
- It comprises a Grey Belt site, in line with the NPPF definition.
- Has the ability to deliver housing early on in the Plan Period and could start to deliver some housing within the first five years.

SS 27: Do you have any further comments about any of the potential growth areas identified around Ellesmere Port?

8.4. No detailed comments at this stage – other than to note that growth option EPO1, located to the immediate south of the Dunkirk Farm Growth Area, is a mixed housing/employment area. Should additional employment development be located in the area to the south, Dunkirk Farm is very well placed to accommodate this growth and to meet the additional housing needs of the area in a sustainable manner.

SS 28: Are there any constraints, including infrastructure provision, that should be considered for Ellesmere Port when developing the new Local Plan?

8.5. No comments at this stage.

Policy EP 1 (Ellesmere Port)

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

- 8.6. The policy notes how development in Ellesmere Port has the potential to deliver substantial economic growth, through continued and new investment in Ellesmere Port Origin. Ambitious economic growth in Ellesmere Port will need to be supported by additional housing – as the two go hand in hand. This further justifies the case to allocate additional housing sites in Ellesmere Port, including Dunkirk Farm.

EP2: Do you have any comments on the use of previously developed land within Ellesmere Port?

- 8.7. No detailed comments to make at this stage – other than to highlight that previously developed land will be insufficient to meet Ellesmere Port's housing requirements alone. There will be a need to allocate suitable Green Belt release sites, including Dunkirk Farm/growth area EPO2.

9. Northwich Growth Areas and Policy NO 1 (Chapter 8)

9.1. This section covers questions in respect of Northwich Growth Areas (SS 29 – SS 31) and Northwich Policy NO 1 (NO 1 – NO 6).

SS 29: Which of the identified potential growth areas around Northwich do you consider to be the most suitable?

9.2. Barratt Redrow support the high level of growth suggested for Northwich under Options B and C (5,000 + homes in both options), noting that if the previous local plan apportionment (4,300 of 22,000 or 19.55%) was applied to the emerging 15 year requirement of 29,000 then Northwich would receive growth of **5,668 homes**, which seems entirely reasonable and proportionate. This is also considered entirely deliverable with the 12 potential growth areas shown having a total indicative capacity of 7,166.

9.3. Whilst the final development numbers for Northwich will be determined as the Local Plan progresses, Barratt Redrow fully support the identification of potential growth area **NOR09 (Land at Chester Road, Hartford)** on Map 5.6 at this stage of the plan process. This potential growth area is one of the most suitable options for housing allocation in Northwich because, as discussed in more detail in the Development Framework contained at **Appendix 3:**

- It will not just deliver much needed homes (around 580), it can also deliver a potential new school and local amenities area. It represents an infrastructure-led development.
- Will deliver substantial levels of green infrastructure on site, including a new Parkland, community allotments, community orchard and various formal play facilities.
- It is unconstrained in respect of all technical considerations and can deliver 10% biodiversity net gain on site.
- It comprises a Grey Belt site, in line with the NPPF definition. Therefore, the site has the ability to deliver housing early on in the Plan Period and can start to deliver some housing within the first five years.

9.4. Barratt Redrow also fully support the identification of potential growth area **NOR11 (Sandy Lane, Weaverham)** on Map 5.6 at this stage of the plan process. This potential growth area is also considered a highly suitable option for housing allocation, alongside NOR09. This is because, as illustrated on the Masterplan contained at **Appendix 7**, and as demonstrated in the accompanying Savills representations:

- It will not just deliver much needed homes (around 330), it can also deliver a new skate park and BMX dirt track which will deliver significant social benefits to the local community.
- It will deliver substantial levels of green infrastructure on site, including significant areas of open space.

- It is unconstrained in respect of all technical considerations and can deliver 10% biodiversity net gain on site.
- It comprises a Grey Belt site, in line with the NPPF definition. Therefore, the site has the ability to deliver housing early on in the Plan Period and can start to deliver some housing within the first five years.

SS 30: Do you have any further comments about any of the potential growth areas identified around Northwich?

- 9.5. We do not have any comments to make on other potential growth areas, other than to raise a query in respect of the selection methodology for including potential growth areas in Options B Option C (the methodology for inclusion in Option A is fairly evident), as the explanatory text at Appendix B (Page 260) focuses on the general identification of these areas (identified through a land search then filtered for significant constraints then given a standard indicative capacity), however it does not explain how areas are selected for each option.
- 9.6. Option C (sustainable growth corridors) confirms an onus on locations well-served by rail and bus services, however it is unclear how this will be assessed/quantified moving forward. For example, potential growth areas **NOR01 (Barton North)** and **NOR10 (Weaverham South)** do not appear to fit the current criteria for Option C, being some distance away from railway stations and high frequency bus corridors, when compared with some of the other potential growth areas (including **NOR02, NOR06, NOR07, NOR08, NOR09, NOR11**). It will be important to clarify the site selection methodology when assessing and allocating potential sites as the Local Plan progresses towards Examination.

SS 31: Are there any constraints, including infrastructure provision, that should be considered for Northwich when developing the new Local Plan?

- 9.7. Alongside the provision of circa 580 homes, Land at Chester Road, Hartford also has the ability to deliver a potential new school and local amenities area, alongside substantial areas of greenspace (known as Hartford Parkland), a community orchard and community allotments.
- 9.8. Land at Chester Road, Hartford (**NOR09**) is therefore very well placed to deliver additional infrastructure for the beneficial use of the existing community, as well as future residents.

Policy NO 1 (Northwich)

NO 2: Do you have any comments on the suggested key allocations/sites?

- 9.9. At this stage, the policy refers to Winnington and Wincham Urban Villages (mixed-use allocations in the adopted Development Plan), Northwich Town Centre and Gadbrook Park (employment).
- 9.10. Redrow support the recognition in the draft policy that other sites to be identified will depend on the chosen spatial strategy. There will clearly be a need to allocate additional sites, with Land at Chester Road, Hartford (**NOR09**) and Sandy Lane, Weaverham (**NOR11**) comprising highly suitable residential sites which should be allocated in the new Local Plan.

NO 5: Should the settlements that make up the wider Northwich urban area be retained?

- 9.11. The draft policy notes how the new Local Plan will set out the level and location of new development within Northwich and the surrounding settlements which make up the Northwich urban area. Barratt Redrow wholly support the retention of the existing settlements that make up the wider Northwich urban area. Indeed, Hartford should remain as per its current designation within the Northwich urban area, with its boundaries redefined to accommodate a residential allocation at Land at Chester Road (growth area NOR09).
- 9.12. Weaverham should also remain as per its current designation within the Northwich urban area, with its boundaries redefined to accommodate a residential allocation at Sandy Lane (growth area NOR11).
- 9.13. No comments to make in respect of questions NO 1, NO 3, NO 4 and NO 6.

Growth in Winsford

SS 33: Do you have any comments about any of the potential growth areas identified around Winsford?

- 9.14. Noting our earlier comments in section 6 of these representations in respect of Spatial Option A not being feasible to accommodate growth in a sustainable manner, the growth options currently shown around Winsford (at Map 5.7) are disproportionate. Whilst Winsford is a main town, it should not be afforded a disproportionate amount of growth on the basis that it is unconstrained by Green Belt. Green Belt is merely a policy designation – delivering growth solely on non Green Belt land would fail to take account of all other planning considerations – most notably sustainability.
- 9.15. In short, housing delivery on non Green Belt land is not a panacea. Growth around Winsford needs to be considered on a proportionate basis and based on evidence which demonstrates the suitability of the settlement and specific sites to accommodate growth.

10. Neston and Parkgate Growth Areas and Policy NP 1 (Chapter 11)

10.1. This section covers questions in respect of Neston and Parkgate Growth Areas (SS 53 – SS 55) and Neston and Parkgate Policy NP 1 (NE 1–NE 2).

SS 53: Which of the identified potential growth areas around Neston and Parkgate do you consider to be the most suitable?

10.2. Barratt Redrow support the high level of growth proposed for Neston and Parkgate under Option C (between 1,500 – 3,000 homes), as elevated levels of growth will be required in Neston and Parkgate in order to meet emerging CW&C needs and to support Neston and Parkgate’s elevation to a ‘Market Town’ in the settlement hierarchy. This level of growth is entirely reasonable and deliverable given the 6 potential growth areas shown which have a total indicative capacity of 4,393.

10.3. Whilst the final development numbers for Neston and Parkgate will be determined as the Local Plan progresses, Barratt Redrow fully support the identification of potential Growth Area **NEP04 (Land at Raby Park Road, Neston)** on Map 5.14 at this stage of the plan process. This potential growth area is the most suitable option for housing allocation in Neston and Parkgate because, as confirmed in the information contained at **Appendix 4:**

- The site has capacity to deliver circa 400 new homes, alongside significant levels of green infrastructure – including allotments, a Central Green, a LEAP and a LAP.
- The site is technically unconstrained and therefore a suitable housing site.
- It benefits from a sustainable location to existing amenities and public transport – located within 700m of the centre of Neston where a wide range of amenities are located. Neston High School is also located directly opposite the site. It is understood that 30% of vehicle movements in the morning peak hour are related to taking children to school. The site therefore benefits from an excellent location in this respect, as there are unlikely to be any vehicle trips between the school and the site.
- It comprises a Grey Belt site, in line with the NPPF definition and has the ability to deliver housing early on in the Plan Period.

SS 54: Do you have any further comments about any of the potential growth areas identified around Neston and Parkgate?

10.4. Barratt Redrow also support the identification of Potential Growth Area **NEP02** at this stage of the plan process. Harrow Estates (who form part of the wider Barratt Redrow Group) have land interests in this growth area and are actively promoting it for allocation. Please refer to the site-specific representations prepared by Harrow Estates for full details.

10.5. No comments to make in respect of question SS 55.

Policy NP 1 (Neston and Parkgate)

NE 1: Do you agree with the suggested policy approach towards Neston and Parkgate, as set out in NP 1 'Neston and Parkgate' above? If not please suggest how it could be amended?

- 10.6. As already explained under question SS 5, Barratt Redrow fully support the elevation of Neston and Parkgate to a 'Market Town' in the emerging settlement hierarchy. This will necessitate the allocation of some Green Belt release site(s), with Land at Raby Park Road (**NEPO4**) representing a highly suitable and sustainable housing site.
- 10.7. Policy NP 1 notes that the policy approach will generally reflect the objectives and projects identified in the Neston Neighbourhood Plan (NP). We note that the adopted NP was adopted in March 2016 and covers the existing local plan period up to 2030. Therefore, whilst some of its general objectives will remain relevant, it will be important to ensure it is updated such that it remains in general conformity with the new Local Plan and does not undermine its strategic objectives. It's policies and objectives can therefore not be fully relied upon when drafting the emerging Local Plan, as the plan is now dated and a new planning policy context is emerging.

11. Other Policies (Chapters 13 – 27)

GB 1: Green Belt and Countryside

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

- 11.1. The draft policy states that current Local Plan policy STRAT 9 may need to be updated if required to set out the approach to grey belt and to reflect Green Belt review evidence in terms of overall approach and to inset areas/washed over settlements. As explained throughout these representations, exceptional circumstances exist to review Green Belt boundaries, namely CW&C's substantial development requirements and acute five year housing supply shortfall.
- 11.2. Barratt Redrow is supportive of the reference to Grey Belt. NPPF paragraph 148 clearly sets out the sequential approach in respect of Green Belt, namely:
- "Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."*
- 11.3. It will be important for the Local Plan to follow this approach to Green Belt release, to ensure that plan can be considered sound (justified and consistent with national policy).

TA 1: 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?

- 11.4. Barratt Redrow support the statement that new development will be encouraged in more sustainable locations, recognising that the approach to transport will vary depending on site location. Indeed, we address this in more detail under question SS 19, noting how approaches will vary depending on location with current Spatial Option C being overly focussed on higher frequency bus corridors and proximity to railway stations, when Active Travel is an equally (and arguably more) pertinent consideration.
- 11.5. The draft policy then 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, as well as being able to travel outside of their settlements by a range of sustainable travel choices. Well established guidance, namely the Chartered Institution for Highways and Transportation

(CIHT) document entitled ‘Providing for Journeys on Foot’ suggests walking distances outlined below.

	Town Centres (m)	Commuting/School/ Sightseeing (m)	Elsewhere/Local Services (m)
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred Maximum	800	2,000	1,200

- 11.6. Noting the above preferred maximum distances, it is considered that more flexibility is required when determining sustainability matters, and that 800m should not represent an upper limit/ cap for site selection.
- 11.7. Notwithstanding our general comments above, the submitted Development Frameworks for each of Redrow’s land interests confirms that each site is sustainably located in relation to local services, as summarised below:
- Land at Lache Road/Wrexham Road Extension, as confirmed in the Delivery Statement at **Appendix 1**, is sustainably located adjacent to the Kings Moat Garden Village. A range of facilities are located within 1,200m⁷, including Kings Moat Local Centre which can be accessed within a 10-minute walk.
 - Land at Hare Lane, as confirmed in the Development Framework at **Appendix 2**, is sustainably located in relation to local bus services.
 - Land at Chester Road, Hartford, as confirmed in the Development Framework at **Appendix 3**, has a range of local amenities⁸ located within walking distance of the site. This includes Hartford Railway Station being located within 400m (a 5-minute walk), as well as a number of bus stops.
 - Land at Raby Park Road, Neston, as confirmed in the Development Framework at **Appendix 4**, benefits from an excellent location directly opposite Neston High School. Neston Centre can also be accessed within a 10-minute walk⁹ and is home to numerous shops and amenities.
 - Land at Mill Lane, Willaston, as confirmed in the Development Framework at **Appendix 5**, benefits from a number of services being located within a 400m radius of the site (5-minute walk)¹⁰. This includes a primary school, GP surgery and bus stops.

⁷ See Site Context Plan, contained at page 11 of the Delivery Statement.

⁸ See Facilities and Services Plan, contained at page 6 of the Development Framework.

⁹ See Facilities and Services Plan, contained at page 16 of the Development Framework.

¹⁰ See Facilities and Services Plan, contained at page 22 of the Development Framework.

- Land at Dunkirk Farm, as confirmed in the Development Framework at **Appendix 6**, benefits from sustainable access to local bus stops¹¹ – which provides direct access to Liverpool at an operational frequency of two services per hour.

11.8. In respect of David Wilson’s land interests at **Dig Lane, Frodsham**, please refer to the site-specific representations prepared by Turley which demonstrate the sustainability of the site.

11.9. Similarly, in respect of Barratt’s land interests at **Sandy Lane, Weaverham**, please refer to the site-specific representations prepared by Savills which demonstrate the sustainability of the site.

TA 2: Key local transport infrastructure priorities

TA 3: Are there any schemes listed above in TA 2 that should be retained, modified, or deleted?

11.10. Barratt Redrow support the identification of the Chester Western Relief Road in Policy T2. It is considered that this long-standing infrastructure aspiration should be retained as a priority. Barratt Redrow would welcome further details on the proposed route of the Relief Road.

ID 1: 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.

ID 3: Do you agree that developers/operators should pay the full cost of infrastructure required to deliver their sites?

11.11. It is important that any proposed infrastructure and developer contributions are properly costed and assessed through the emerging Viability Assessment and Infrastructure Delivery Plan to ensure that they do not undermine delivery of the plan, in accordance with NPPF paragraph 35.

11.12. Furthermore any developer contributions should only mitigate their own impacts as per the CIL tests set out at NPPF paragraph 58 of the NPPF, and should not be sought to address existing deficiencies or shortfalls in local infrastructure or services.

11.13. It will also be important to ensure no overlapping with the Community Infrastructure Levy (CIL) Charging Schedule that is already in force in the Borough.

11.14. Finally, we endorse the HBF’s position on the following matters:

- Digital connectivity – that any requirement on developers should not go beyond that set out in Building Regulations.

¹¹ See Facilities and Services Plan, contained at page 21 of the Development Framework.

- Maximising employment opportunities for residents – that this needs careful consideration in dialogue with the HBF and wider industry and that the costs associated with such a policy are properly accounted for in the emerging Viability Assessment.

HO 1: Mix and type of housing in new developments and specialist housing

HO 1: Do you agree with the suggested policy approach towards mix and type and specialist housing in new developments, as set out in HO 1? If not please suggest how it could be amended.

HO 2: Should the housing mix and type and specialist housing be delivered through a percentage policy approach that sets requirements for each category of housing?

- 11.15. Barratt Redrow fully understand and support the need to provide a mix of house types, sizes and tenures on site to deliver sustainable, mixed communities. However, the draft policy states that the new policy approach will provide detailed policy requirements e.g. % of 1-2 bed dwellings including by tenures, % of plots for self-build and custom housebuilding and requirements to meet the needs of an ageing population. Barratt Redrow object to this suggested approach.
- 11.16. Prescriptive housing mix requirements often generate viability and deliverability issues. Instead, a flexible approach should be taken to housing mix which recognises that needs and demand will vary from area to area and site to site. A flexible approach also helps to ensure that housing schemes are viable and appropriate for the local market, i.e. housing mix is a matter which should be considered on a site-by-site basis.
- 11.17. In respect of self-build and custom housing, this type of product is generally best delivered on small-medium scale sites that have been specifically allocated for that purpose, rather than as part of larger traditional housing allocations. Such housing is also contingent on there being a demonstrable need. In the case of CW&C', their self-build and custom house building register¹² confirms that only 36 new registrations for self/custom build housing were made between 31st October 2023– 30th October 2024, which does not indicate particularly strong demand given the Borough's size, meaning a specific % requirement for self-build housing is not justified.
- 11.18. In terms of introducing the nationally described space standards, this would need to be justified and follow the guidance within the PPG¹³, which notes that local planning authorities must provide justification taking into account the following areas:
- **need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

¹² <https://consult.cheshirewestandchester.gov.uk/kpse/event/A4F1351D-DE17-4BOE-9967-E36E7154D9FO>

¹³ Paragraph: O20 Reference ID: 56-O20-20150327

- **viability** – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
- **timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.

11.19. We also note the HBF comments that there is a direct relationship between unit size, cost per square metre (sqm), selling price p

11.20. er sqm and affordability. The HBF recommends that the policy approach should recognize that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and affect customer choice.

HO 2: Delivering affordable housing

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

11.21. The government is still yet to publish additional guidance in the PPG in respect of whether there are circumstances in which site-specific viability assessments may be taken into account in respect of the ‘golden rules’ for Green Belt sites.

11.22. The awaited publication of this additional guidance may alter the current blanket approach of 50% affordable housing on Green Belt sites released through Local Plans, as confirmed at NPPF paragraph 67:

*“As part of the ‘Golden Rules’ for Green Belt development set out in paragraphs 156– 157 of this Framework, a specific affordable housing requirement (or requirements) should be set for major development involving the provision of housing, **either on land which is proposed to be released from the Green Belt** or which may be permitted on land within the Green Belt. This requirement should:*

a) be set at a higher level than that which would otherwise apply to land which is not within or proposed to be released from the Green Belt; and

b) require at least 50% of the housing to be affordable, unless this would make the development of these sites unviable (when tested in accordance with national planning practice guidance on viability)”

11.23. NPPF paragraph 68 then notes that the affordable housing requirement for land within or released from the Green Belt may be set as a single rate or be set at differential rates, subject to the criteria above. 50% affordable housing should not be seen as a set rate to be achieved across the Borough – as this will not be viable. The reference in draft policy HO 2 to how affordable housing could potentially be determined by sub-area aligns with this and is therefore welcomed.

11.24. Any affordable housing requirement on Green Belt release sites must be viability tested through a robust evidence base. We reserve the right to make further comments at the next stage of the process, once the relevant PPG viability guidance is updated.

FW 1: Flood Risk and water management

FW 1: Do you agree with the suggested policy approach towards flood risk and water management, as set out in FW 1? If not please suggest how it could be amended?

FW 2: Should the SuDs element of the suggested policy approach include a requirement for nature-based solutions to maximise multifunctional benefits?

- 11.25. The draft policy is in line with the requirements of Section 14 of the NPPF in respect of the sequential test, however it is important that any emerging policy is also aligned with updated PPG Guidance. The PPG seeks to provide a more practical and pragmatic approach to development within areas of flood risk. Ultimately, the key test in respect of flood risk is to ensure that development will be safe throughout its lifetime and not lead to increased flood risk elsewhere¹⁴. This can be achieved through detailed design and an appropriate drainage strategy.
- 11.26. We reserve the right to make further detailed comments as Cheshire West and Chester Strategic Flood Risk Assessment evolves through the emerging plan process.
- 11.27. Barratt Redrow is supportive of multi-functional, nature-based drainage solutions where feasible, noting that some drainage solutions have significant overlaps in respect of ecological mitigation and biodiversity net gain.

LA 1: Landscape

LA 3: In advance of any formal designation of national landscape, how should the Local Plan deal with it?

- 11.28. It has recently been announced that the application for the Cheshire Sandstone Ridge to be designated as an Area of Outstanding Beauty (National Landscape) has been paused due to funding issues¹⁵. There is therefore not a need for planning policy to address this at this point in time and Barratt Redrow would strongly object to the introduction of a policy prior to any formal designation.

GI 1: 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? If not please suggest how it could be amended?

- 11.29. The draft policy states the following:

“New policy wording will broaden the current policy approach and improve and maintain tree canopy cover within the Borough on a strategic level. This would refer to a ‘league table’ of wards with low tree cover, where development in these wards will need to provide additional green space as would normally be required, with low performing

¹⁴ PPG Paragraph: O29 Reference ID: 7-O29-20220825

¹⁵ <https://www.sandstoneridge.org.uk/news/aonb-update-2.html>

wards prioritised for new tree planting. The aim is to get all wards to a minimum of 16% tree cover”

- 11.30. It is considered that further evidence will need to be provided to justify the above approach, including aim for 16% tree cover in all wards. There will also be a need to understand any viability implications of additional green space provision in certain wards, which will also provide additional clarity to developers who will be bringing schemes forward. This is particularly important in respect of understanding the implications this will have on the developable areas within individual schemes.

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

- 11.31. No – Whilst individual sites may have an ability to deliver in excess of the 10% mandatory BNG requirement, it is not considered justified to introduce a higher requirement above the nationally set requirement. This will lead to deliverability and viability issues, which would undermine the emerging plan and its ability to meet its massively increased housing needs and address its acute five year housing supply shortfall.

DS 1: High quality design

DS 1: Do you agree with the suggested policy approach towards high quality design, as set out in DS 1? If not please suggest how it could be amended?

- 11.32. We welcome that this policy is worded flexibly ‘*Development should, where appropriate*’ rather than more prescriptively.
- 11.33. In respect of the Nationally Described Space Standards please see our response to questions HO 1 – HO 2.

DS 2: If the Council produces a Borough-wide Design Code, should this form part of the new Local Plan?

- 11.34. If the Council is to introduce a Borough-wide Design Code, it is important that it is subject to viability testing. This will help to ensure no unnecessary delays to the delivery of development. As the new Local Plan is being prepared, there is likely to be merit in twin-tracking the production of any Borough-wide Design Code, to ensure the two are aligned and that the Local Plan design polices are viable.
- 11.35. Any Design Code should include similar flexibility to policy DS 1 above, allowing for site specific circumstances that may require departures from the standard Design Coding.

DS 2: Sustainable construction

DS 6: Do you think the new Local Plan should set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments?

11.36. The PPG¹⁶ notes that local planning authorities can set energy performance standards for new housing higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes. As a responsible housebuilder, Barratt Redrow fully support the need for new dwellings to be energy efficient and use sustainable construction methods.

11.37. However, should the Council look to introduce a higher local standard, this will need to be duly considered and tested in the viability evidence supporting the Local Plan, to ensure it will not lead to delays in delivery or viability concerns.

DS 7: Do you have any comments on the suggested policy requirements: 1. Energy efficiency; 2. Efficient, fossil-free and renewable energy supply; 3. Carbon/ energy offsetting; 4. Embodied carbon; or 5. Water efficiency – the type and size of development they should apply to, or the targets that should be met?

11.38. Part 5 of the policy notes how new dwellings will be required to meet the optional higher National Housing Standard for water consumption of 110 litres per person per day. This is therefore a higher requirement beyond the 125 litres/person/day set in building regulations.

11.39. The PPG¹⁷ notes that it will be for a local planning authority to establish a clear need for the introduction of any optional higher standards, based on:

- *existing sources of evidence.*
- *consultations with the local water and sewerage company, the Environment Agency and catchment partnerships.*
- *consideration of the impact on viability and housing supply of such a requirement.*

DS 8: Do you think that the new Local Plan should offer an alternative route to compliance if the development achieves a recognisable industry standard/certification?

11.40. The policy notes that as an alternative to the sustainable construction requirements (1-5), positive weight will be given to development proposals that, for residential development, will be certified PassivHaus standard. Barratt Redrow support the policy wording that this is an alternative requirement and not required for all new residential development moving forward.

¹⁶ Paragraph: 012 Reference ID: 6-012-20190315v

¹⁷ Paragraph: 015 Reference ID: 56-015-20150327

12. Conclusions

12.1. In summary, these representations welcome and endorse the Council's positive approach to the emerging plan, in acknowledging the need to meet its increasing housing requirements (through the governments revised standard method) in full, and in identifying potential growth areas across the authority area to help meet these needs.

12.2. Moving onto the detail within the current consultation document:

- We note that the latest standard method of figure of **1,928 dwellings per annum (dpa)** should be used as a minimum within **Policy SS1**, which includes the 2024 affordability ratios and stock data, which represents a 75% uplift from the adopted plan requirement of 1,100 dpa and generates a requirement for **29,000** homes across a 15 year period. It also leaves CW&C with a 5 year supply of just **1.9 years**, equating to a shortfall of 6,250 to be met in the next 5 years.
- There are no circumstances in which the Local Plan should not deliver the minimum 1,928 requirement, and in order to achieve the Borough's full potential, a scenario which aligns economic and housing growth generates a requirement to deliver at least 2,169 dpa.
- This massively increased need and existing supply shortfall provides the exceptional circumstances for Green Belt release through the new Local Plan, as does the need to achieve sustainable growth in line with the established settlement hierarchy, where a number of most sustainable settlements (such as Chester, Ellesmere Port and Northwich which are the three largest settlements at the top of the settlement hierarchy) are surrounded or impacted by Green Belt.
- Accordingly, we fully endorse the spatial strategy principle in **Policy SS3** of allocating 'sites on the edge of existing settlements in locations with the best access to public transport and existing services and infrastructure' and the acknowledgment that this will require Green Belt, as this approach is fully aligned with paragraphs 147 and 158 of the NPPF.
- We also support the elevation of Neston and Parkgate, and Frodsham to 'Market Towns' in the revised settlement hierarchy in **Policy SS4**, as well as the retention of Chester as the principal 'City', and Northwich and Ellesmere Port as 'Main Towns'. We also consider that Willaston should be elevated to a Key Service Centre (or equivalent status in the emerging plan) due to its size and sustainability credentials.
- In terms of the spatial strategy options in **Policy SS5**, it is our strong view that Option A should be discounted as there is compelling evidence that Green Belt release will be required and that retaining the existing Green Belt will constrain growth and generate unsustainable development patterns. We support a hybrid of Options B & C, following the general distribution from the adopted Local Plan (with the highest growth ascribed to Chester and the main towns including Northwich), whilst also taking account of the revised settlement hierarchy (including elevated growth in the 'Market Towns' of Neston and Frodsham), as well as the general sustainability ethos from Option C, but with more focus on site specifics and Active Travel, than sustainable transport corridors. We also support development in smaller settlements

where is capacity, to support the vitality of rural areas as per paragraph 83 of the NPPF.

- In respect of **Chester (Map 5.4 / Policy CH1)**, we support significant growth in line with Option B (5,000+ homes) and the adopted plan apportionment (equating to 6,855 homes), and the identification of potential growth areas at **CH03 (Land at Decoy Farm/Land at Lache Lane)** and **CH02 (Land at Hare Lane)**. As discussed in these representations, land at Lache Lane represents a logical first phase of growth area CH03 which can be delivered independently and can deliver around 160 no. dwellings. Land at Hare Lane can deliver around 560 homes. As confirmed in the information contained at Appendices 1 & 2, the two sites being promoted by Redrow can suitably accommodate 720 homes. Furthermore, potential growth areas CH02 and CH03 represent suitable areas for Green Belt release in their entirety.
- In terms of **Ellesmere Port (Map 5.5/Policy EP1)**, we support the higher level growth options suggested under Options B and C (up to 5,000 or 5,000+), which is entirely appropriate noting the economic growth ambitions for the area and would be reflective of the settlement's size as the second largest settlement in the Borough after Chester. We also fully support the identification of potential growth area **EPO2 (Dunkirk Farm)**, which has been demonstrated to be a suitable and deliverable site capable of delivering **550 homes** (see Appendix 6 for details).
- In terms of **Northwich (Map 5.6 / Policy NO1)**, we welcome the high level of growth suggested under Options B and C (5,000 + homes in both) which aligns with the adopted plan apportionment (equating to 5,668 homes). We fully support the identification of potential growth area **NOR09 (Land at Chester Road, Hartford)** which has been demonstrated to be a suitable and deliverable site capable of delivering **580 homes** (See Appendix 3 for more details). We also fully support the identification of potential growth area **NOR11 (Sandy Lane, Weaverham)** which has been demonstrated to be a suitable and deliverable site capable of deliver 330 homes (see Appendix 8 for Illustrative Masterplan and please refer to separate representations prepared by Savills).
- In considering growth in **Neston and Parkgate (Map 5.14 / Policy NP1)**, we would advocate the level of growth put forward under Option C (between 1,500 – 3,000 homes) to support its elevation to a 'Market Town'. We also fully support the identification of potential growth area **NEPO4 (Land at Raby Park Road, Neston)** which has been demonstrated to be a suitable and deliverable site capable of delivering **400 homes** (See Appendix 4 for more details).
- In considering growth in **Frodsham (Map 5.10)**, we fully support its elevation to a market town. Furthermore, we fully support the identification of potential growth area **FROO3 (Dig Lane, Frodsham)**, which has been demonstrated to be a suitable and deliverable site capable of delivering 91 homes (see Appendix 7 for Site Layout and please refer to separate representations prepared by Turley). The detailed planning application on site for 91 dwellings, which is pending determination, further demonstrates the deliverability of the site early on in the Plan Period.
- Whilst **Willaston** does not have specific policy or growth area map, we would reiterate our strong view that it should be elevated to a Key Service Centre (or equivalent status) and that the land at Mill Lane should be allocated for development,

on the basis it has been demonstrated to be a suitable and deliverable site capable of delivering **160 homes** with excellent opportunities for Active Travel improvements.

- We also provide comments on the suite of development management policies from chapter 13 to 27, and offer suggestions on how the evidence base and detailed wording can be further improved and justified.

12.3. On the basis of the above, we respectfully request that Barratt Redrow's following land interests are identified for housing allocation in the next version of the local plan:

- Land at Lache Lane, Chester (Redrow)
- Land at Hare Lane, Chester (Redrow)
- Land at Chester Road, Northwich (Redrow)
- Land at Raby Park Road, Neston (Redrow)
- Land at Dunkirk Farm, Ellsemere Port (Redrow)
- Mill Lane, Willaston (Redrow)
- Land at Dig Lane, Frodsham (David Wilson)
- Sandy Lane, Weaverham (Barratt)



Appendix 1: Lache Lane/Wrexham Road Extension, Chester – Delivery Statement & Highways Note



Appendix 2: Hare Lane, Chester – Delivery Statement, Ecology, Trees and Highway Reports



Appendix 3: Land at Chester Road, Hartford – Development Framework, Biodiversity Net Gain, Tree and Highway Reports



Appendix 4: Land at Raby Park Road, Neston – Development Framework, Biodiversity Net Gain, Trees and Highway Reports



Appendix 5: Mill Lane, Willaston – Development Framework and Heritage Report



Appendix 6: Dunkirk Farm, Ellesmere Port – Development Framework, Ecology, BNG, Trees and Planning/Grey Belt Notes



Appendix 7: Land at Dig Lane, Frodsham – Site Layout



Appendix 8: Sandy Lane, Weaverham – Illustrative Masterplan



Appendix 9: Lichfields Objectively Assessed Housing Need Research Paper for CW&C

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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