



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

In relation to:

Land at A54 Holmes Chapel Road / Pochin Way,
Middlewich

On behalf of Northern Powerhouse Land Ltd

August 2025

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APPENDICES

APPENDIX 1: Site Location Plan

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1 INTRODUCTION

- 1.1 These representations have been prepared by Asteer Planning LLP (“Asteer”) on behalf of Northern Powerhouse Land Ltd (“NPL”) in response to the Cheshire West and Chester (“CWaC”) Local Plan Issues and Options (Regulation 18) Consultation (“Issues and Options Consultation”), running from 4th July 2025 until 29th August 2025. These representations provide a response to the Issues and Options Consultation specifically in relation to land under NPL’s control at A54 Holmes Chapel Road / Pochin Way, Middlewich (“the site”). A Site Location Plan is enclosed at **Appendix 1**.
- 1.2 NPL supports the Council’s decision to progress with a new Local Plan to create a single Local Plan document, which will update and replace all policies in the current Local Plan (Part One) (“LPP1”) and Local Plan (Part Two) (“LPP2”). The new Local Plan will provide an opportunity for CWaC to plan for its strategic growth, ensuring that its development needs are met over the next Plan period and beyond. This is particularly important in light of the Government’s revised National Planning Policy Framework (“NPPF”) and the updated method for estimating housing need, which has resulted in CWaC’s Local Housing Need (“LHN”) figure increasing substantially from 532 dwellings per annum (“dpa”) to 1,914dpa (259.77% increase). The Council has also recently published its latest Housing Land Monitor Summary Report (2025), which states that the Council has a five-year housing land supply position of 1.89 years. Therefore, it is clear that there is an acute and serious level of housing need in CWaC.
- 1.3 The purpose of these representations is to help to inform the emerging Local Plan’s spatial strategy, strategic policies and land allocations, and to demonstrate the deliverability of the site for residential-led, mixed-use development.
- 1.4 NPL is committed to demonstrating the site’s deliverability and suitability as a residential-led, mixed use allocation as the emerging Local Plan is progressed and would welcome continued engagement with the Council as the consultation responses are considered. NPL would be happy to discuss any feedback regarding these representations or in relation to the site specifically.
- 1.5 NPL has engaged in pre-application discussions with CWaC Officers regarding a prospective planning application for residential-led, mixed use development on the site. NPL is currently developing the proposals for the site in line with the pre-application feedback received from officers.

NPL Limited

- 1.6 NPL is a family run business focusing on strategic land development and property investment in the North West and North Wales. The directors of the business have been involved in development across the North West for the last 30 years.
- 1.7 NPL is promoting significant strategic residential and employment sites in Cheshire East,, Trafford and across the North West. NPL is experienced in the delivery of large-scale development and has been involved in the successful delivery of major manufacturing and logistics development at Ma6nitide, Middlewich, and major mixed-use development at Deeside, including the delivery of 770 units.
- 1.8 NPL has an impressive track record of delivering high-quality mixed-use schemes which combine residential, employment, and logistics space, demonstrating consistent capability in unlocking strategic land and delivering long-term benefits.

Structure of Submission

- 1.9 The remainder of this submission is set out as follows:
 2. **Background to the Site:** describes the site and its surroundings, details the site's relevant planning history, and summarises the site's technical and environmental considerations;
 3. **Planning Policy Context:** provides an overview of the national planning context and presents the case for the allocation of the site for residential-led, mixed-use development;
 4. **Comments on the Issues and Options Document:** comments on the potential growth strategy options and suggested policy approaches detailed in the Issues and Options Document, specifically in relation to the site;
 5. **A Deliverable Site:** assesses the site's context and its surroundings and accessibility/sustainability, and provides a summary of the deliverability of the site and its key benefits; and,
 6. **Conclusions and Recommendations:** provides conclusions and recommendations on the Issues and Options Document, which it is respectfully requested are taken forward in the next stage of the new Local Plan.

2 BACKGROUND TO THE SITE

- 2.1 This section of the representations describes the site and its surroundings, details the site's relevant planning history, and summarises the site's technical and environmental considerations.

The Site and its Surroundings

- 2.2 The site (as edged in red at **Appendix 1**) extends to circa. 15.9 hectares ("ha") and is located to the east of the urban area of Middlewich. An electricity sub-station is located to the north of the site and is excluded from the site red edge.
- 2.3 The site is closely related to Cheshire East, sharing its western boundary with this authority, and the town centre of Middlewich is located approximately 1km to the west of the site.
- 2.4 According to the adopted Proposals Map, the site is within the Open Countryside (LPP1 Policy STRAT 9), a Minerals Supply and Safeguarding Area (LPP1 Policy ENV 9), the Jodrell Bank Radio Telescope Consultation Zone (LPP2 Policy DM 12), PEDL licensed block (12 July 2016) (LPP2 Policy M 4), and a Preferred Area for Controlled Brine Extraction (LPP2 Policy M 6).
- 2.5 The site is bound by the A54 Holmes Chapel Road to the north. To the north-west of the site is a residential allocation (CEC Reference: SADPD Policy MID 2), to the west of which is established residential development. To the west of the site is a restaurant and employment units, which comprise part of the Midpoint 18 allocated employment site (CEC Reference: LPS 44). The site is bound to the south and east by a strong, existing landscape framework, comprising mature trees and hedgerow.

Relevant Planning History

- 2.6 The site forms part of a wider site, which crossed both CWaC and Cheshire East administrative boundaries and for which hybrid planning permission was granted for the following development on 4th September 2014 (LPA reference: 13/03828/FUL / known as "the Cheshire Fresh Scheme"):

"Full application for erection of a new auction centre for Cheshire and associated livestock accommodation building, barn and pump house and parking for cars and HGV's with vehicular access from A54 and Pochin Way. Estate road and associated infrastructure and hard and soft landscaping. Outline application for food production centre, business and offices, starter industrial units, light industrial, manufacturing and distribution areas,

machinery dealership, veterinary practices, garden centre, farm shop and associated food hall, a box park, restaurant and cafes.”

- 2.7 Owing to the majority of the site being located within CWaC, powers were granted to CWaC by Cheshire East Council (“CEC”) to determine the hybrid planning application.
- 2.8 An application to discharge conditions pursuant to the hybrid planning permission in relation to the new access from Holmes Chapel Road was granted on 1st September 2017 (LPA reference: 17/02990/DIS). The access to the site from Holmes Chapel Road was then successively implemented and this permission is, therefore, extant.
- 2.9 Approval of reserved matters in relation to the outline element of the hybrid planning permission was granted on 18th July 2019 (LPA reference: 19/00652/REM). Applications to discharge the pre-commencement conditions attached to the hybrid planning permission and the reserved matters consent in relation to Unit 25 were granted approval on 15th July 2021 (LPA references: 21/01833/DIS and 21/01832/DIS). A lawful start was made on the construction of Unit 25 ahead of the expiration date of 17th July 2021. Since then, NPL has submitted further applications to discharge pre-commencement conditions attached to the hybrid planning permission in relation to the majority of the site.
- 2.10 Consequently, the site benefits from an extant planning permission for a major mixed-use development, which includes some retail uses.

Technical and Environmental Considerations

Ecology and Trees

- 2.11 The site is not covered by any ecological designations, including Sites of Special Scientific Interest (“SSSI”) or Special Protection Areas (“SPA”). As part of any prospective planning application at the site, the relevant ecological surveys would be undertaken and the proposed development would achieve a Biodiversity Net Gain (“BNG”) of at least 10%. The mitigation hierarchy would be followed and habitat would be provided on site where possible.
- 2.12 According to CWaC’s map of Tree Preservation Orders (“TPOs”), there are five individual Oak trees within the site that are protected by a TPO (Order No. 13/00026/ORD). The TPOs are situated along the site boundaries. Working with an experienced arborist, the impact of any proposed development on the site on TPOs, and trees that are not subject to a TPO, would be carefully considered and would be reflected on the proposed site layout.

Heritage

- 2.13 The site is not located within a Conservation Area and does not contain any statutory or locally listed buildings. The site is partially contained within the Jodrell Bank World Heritage Site (“WHS”). It is circa. 9km from the Lovell Telescope at the Jodrell Bank Observatory and is identified as being within the Jodrell Bank Radio Telescope Consultation Zone (according to LPP2 Policy DM 12),
- 2.14 As demonstrated by the hybrid planning permission granted at the site, built development at scale has already been consented on the site and, thus, can be acceptable at the site in planning policy and technical terms. Furthermore, Jodrell Bank had no objection to the hybrid planning application, subject to electromagnetic screening materials being incorporated into the design of the buildings.
- 2.15 As part of any prospective planning application at the site, the impact of the proposed development on Jodrell Bank, both in terms of the potential electromagnetic interference of the proposed development and its impact on the WHS, would be assessed.

Flood Risk and Drainage

- 2.16 The site is located entirely within Flood Zone 1, within which there is a low probability of flooding from rivers and the sea. The site typically falls to the drainage ditch running along the southern boundary. Also running east-west through the site is an existing ditch. A future planning application at the site would be accompanied by a flood risk assessment and drainage strategy prepared by a specialist consultant.

Public Rights of Way

- 2.17 There are no Public Rights of Way (“PRoW”) within the site.

Utilities and Services

- 2.18 There are two pylons within the site; one to the north of the site close to the Holmes Chapel Road frontage and the other towards the southern boundary. The pylons connect overhead power lines running north-south. Also running along the north-south axis through the centre of the site is an underground gas pipeline. The existing utilities and servicing infrastructure would be considered fully as part of any future development proposals.

Accessibility and Sustainability

- 2.19 The site is in a sustainable and accessible location, with access to a range of services in proximity, including:

- Convenience shopping (Shell c. 500m; Tesco Express c. 1.3km; Lidl c. 1.8km);
- Schools (Middlewich High School c. 1.6km; Middlewich Primary School and St Mary's Catholic Primary School c. 1.9km; Holmes Chapel Comprehensive School and Sixth Form College c. 4km; Warrington & Vale Royal College (Winsford Campus) and Sandbach High School and Sixth Form College c. 6.5km);
- Post Office (Middlewich Post Office c. 1.4km);
- Sports facilities (Middlewich Leisure Centre and Pro Football Academy Middlewich c. 1.6km; Middlewich Town Social Club c. 2.1km; Middlewich Cricket Club c. 2.25km);
- Parks (Fountain Fields c. 1.6km);
- Nurseries / Children's centres (Kids Planet Middlewich c. 1.6km; Little Learners Day Nursery c. 1.9km);
- Pubs (The Boars Head, Middlewich and The Kinderton c. 1.13km; The Kings Arms and The Vaults c. 1.29km; The White Bear c. 1.45km);
- Hot Food Takeaways (Balti Spice Takeaway and Dragon City c. 1.23km);
- Cafes (Starbucks c. 0.32km; Number 28 Hightown c. 1.23km);
- Restaurants (Miller & Carter Middlewich adjacent to the west of the Site);
- General Practice (Waters Edge Medical Centre c. 1.29km);
- Pharmacy / Chemist (Rowlands Pharmacy Oaklands c. 1.61km); and,
- Hairdresser (Salon 32 and Tims Gents Hair Shop c. 1.23km).

2.20 The site is situated approximately 1km to the east of Middlewich Town Centre, which hosts a number of local services and amenities.

2.21 The nearest bus stops are located on Centurion Way, c. 800m to the northwest of the site, and can be accessed within a 10-11 minute walk. These provide access to Congleton, Crewe, and Leighton via the No. 42. Further bus stops are located within Middlewich Town Centre, c. 1.29km to the southwest of the site, and can be accessed via a 15-17 minute walk from the Site. These provide an additional service, the No. 37, which provides access to Northwich, Winsford, Sandbach, and Crewe.

- 2.22 The nearest rail station to the site is Winsford railway station, which is located approximately 4.9km from the site. Furthermore, it is important to note that there are plans for a train station to be delivered in Middlewich in the future. The train station is expected to come forward as part of the "Brooks Lane" Strategic Location LPS 43 (identified within the Cheshire East Local Plan Strategy 2010-2030), which is located approximately 1km to the south-west of the site (as referred to at paragraph 12.4 of the Issues and Options Document).
- 2.23 The site is well located in terms of the wider highways network as it is only 2.5km from the junction with the M6 providing links south towards Stoke-on-Trent, Stafford and Birmingham, as well as links north towards Manchester. Moreover, the Middlewich Eastern Bypass ("MEB"), for which funding was recently confirmed by the Department for Transport¹, will provide a new access road into the site.

Summary

- 2.24 The site extends to approximately 15.9 hectares and is located to the east of the urban area of Middlewich. The site is currently identified as Open Countryside, however, it has extant planning permission for major mixed-use development (LPA reference: 13/03828/FUL) and sits on the edge of the existing urban area, benefitting from good accessibility to a wide range of local services, facilities, and transport connections.
- 2.25 The site is not constrained environmentally or technically (as further evidenced by the granting of planning permission for major development at scale on the site), and, with appropriate design and mitigation, a residential-led, mixed-use development on the site would be able to deliver a sensitively designed, landscape-led scheme.
- 2.26 Overall, the site represents a suitable and appropriate location to deliver a high-quality residential-led, mixed-use development, which would contribute positively towards meeting the identified development needs within the Borough.

¹ Cheshire East Council, 2025, *Government approval given to Middlewich Eastern Bypass*, Available online: https://www.cheshireeast.gov.uk/council_and_democracy/council_information/media_hub/media_releases/government-approval-given-to-middlewich-eastern-bypass.aspx

3 PLANNING POLICY CONTEXT

3.1 This section provides an overview of the national planning context and presents the case for the allocation of the site for residential-led, mixed-use development.

National Policy Context

3.2 Housebuilding is at the forefront of the Government's economic agenda, with the stated intention being to deliver 1.5 million homes over its Parliament². To achieve this, the Government has already published a "new growth focused [National Planning Policy Framework]"³ and is pushing ahead with a Planning and Infrastructure Bill, which the Government sees as central to its plan to deliver economic growth.

3.3 The aim of the updated NPPF, which was published in December 2024, was to "radically reform the planning system" and included various changes to speed up and streamline the planning process.

Local Housing Need

3.4 Following the publication of the latest iteration of the NPPF, the Government updated the method for estimating housing need by introducing a new standard method. As set out in paragraph 78 of the NPPF, the new Local Housing Need ("LHN") is applied with immediate effect to CWaC's five year housing land supply (as the adopted Local Plan is more than five years old). The new standard method has resulted in a substantial increase in Cheshire West and Chester's LHN figure from 532 dwellings per annum ("dpa") to 1,914 dpa (259.77% increase).

3.5 In the Local Plan Part One (Strategic Policies) Review (January 2025), the Council acknowledged the considerable impact that the revised LHN has had on its housing numbers and has re-emphasised the need for an updated Local Plan, stating that (Author's emphasis in **bold**),

*"The **dramatic increase** for Cheshire West and Chester from a Local Housing Need (LHN) of **around 530 dwellings to over 1,900 dwellings per annum represents a significant change**. The **Local Plan housing requirement of 1,100 dwellings is now***

² Gov.uk., 2024, *Press release: Planning overhaul to reach 1.5 million new homes*, Available at: <https://www.gov.uk/government/news/planning-overhaul-to-reach-1-5-million-new-homes#:~:text=Our%20Plan%20for%20Change%20means,blockers%20and%20obstructs%20the%20builders>

³ *ibid.*

considerably lower than LHN. As set out in the Cabinet report in January 2025 it is acknowledged that changes to LHN are significant and that if the Council had not already decided to update the Local Plan would have prompted an update.

- 3.6 Consequently, and as recognised by the Council, the changes to the LHN “*significant*” and there is a clear need for housing to be delivered in Cheshire West and Chester.
- 3.7 Further to the above, the Council’s Cabinet recently decided to adopt the Housing Strategy 2025-2035, within which it is acknowledged that “*...there are challenging times ahead, there is a national housing crisis, housing is less affordable, and many people have support needs making it even more difficult to access and sustain accommodation.*”⁴ Coupled with these challenges, the Housing Strategy acknowledges that the population of Cheshire West and Chester is forecast to increase by more than 10% by 2038. Therefore, there is a clear need for housing within the borough.

Five-Year Housing Land Supply

- 3.8 As set out above, the five-year housing land supply is calculated based on the new standard method requirement (1,914 dpa). As a result, according to CWaC’s Housing Land Monitor Summary Report (2025), the Council has a five-year housing land supply position of **1.89 years**.

The Case for Allocation

- 3.9 NPL previously sought to promote the site as an employment-led allocation through the CWaC LPP2 and attended the Examination in Public. However, the site was not allocated as such and, instead, it is currently identified as ‘Open Countryside’. More recently, NPL submitted representations to CWaC in March 2024 to the Council’s consultations on the Stage 1 Land Availability Assessment and Draft Employment Areas Survey 2023. However, it is important to note that these representations were submitted ahead of the revised NPPF being published and the new standard method being introduced. Since this time, there has been a clear and significant shift in the Government’s economic agenda, which clearly sees housebuilding as key to unlocking and driving economic growth and recognises the “*chronic housing crisis*”⁵ that the country is facing (as detailed above).

⁴ CWaC, 2025, *Housing Strategy 2025-2035*,

<https://cmttpublic.cheshirewestandchester.gov.uk/ieListDocuments.aspx?CId=983&MId=7225>

⁵ Gov.uk., 2024, *Press release: Planning overhaul to reach 1.5 million new homes*, Available at:

<https://www.gov.uk/government/news/planning-overhaul-to-reach-15-million-new->

- 3.10 As demonstrated by CWaC’s five-year housing land supply position and the substantial increase in the Borough’s LHN (259.77% increase), it is clear that there is an acute and serious level of housing need in Cheshire West and Chester. Therefore, there is a undeniable need to allocate sufficient, suitable sites through the new Local Plan to meet the Borough’s identified housing needs now and for the duration of the Plan-period.
- 3.11 The site that is the subject of these representations is currently allocated as Open Countryside in CWaC’s adopted Local Plan; it is not within the Green Belt and is bound by the existing urban area of Middlewich to the east. Furthermore, the site has extant planning permission for major mixed-use development and development has lawfully commenced on the site (as detailed at Section 2 of these representations). Therefore, as a result of the consented scheme, it is clear that built development at scale can be acceptable at the site in planning policy and technical terms. Additionally, since the hybrid planning permission was granted, not only has there been a significant change in the planning policy context (i.e., the increased LHN and the Government’s emphasis on accelerating housebuilding), but the site’s physical context has changed/is changing, with a site for around 75 new homes allocated in CEC’s SADPD (Policy MID 2) to the north of Holmes Chapel Road and funding having recently been confirmed for the Middlewich Eastern Bypass (“MEB”)⁶.
- 3.12 NPL has strong connections with the development industry and would work with the relevant partners to deliver a high-quality residential-led, mixed-use development on the site, which could be delivered early within the Plan period.
- 3.13 Consequently, the site represents a suitable and appropriate location to deliver a high-quality residential-led, mixed-use development, which would contribute positively towards meeting the identified need for housing within the Borough, and, thus, the site should be allocated accordingly in the new Local Plan.

[homes#:~:text=Our%20Plan%20for%20Change%20means,blockers%20and%20obstructs%20the%20builders](#)

⁶ Cheshire East Council, 2025, *Government approval given to Middlewich Eastern Bypass*, Available online: https://www.cheshireeast.gov.uk/council_and_democracy/council_information/media_hub/media_releases/government-approval-given-to-middlewich-eastern-bypass.aspx

4 COMMENTS ON THE ISSUES AND OPTIONS LOCAL PLAN

- 4.1 This section comments on the potential growth strategy options and suggested policy approaches detailed in the Issues and Options Document, specifically in relation to the site.

Suggested Policy Approach VI 1 – Vision

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

- 4.2 NPL supports the overarching vision for Cheshire West and Chester to be *“a desirable and attractive place to live, work, learn and visit with vibrant towns and villages, by meeting [its] development needs in sustainable locations.”* However, central to achieving this vision will be the delivery of new homes and jobs within the Borough and, yet, no reference is made to the provision of new housing and employment opportunities within the four *“overarching principles”* that are currently stated in the VI 1 text. Therefore, an additional overarching principle should be added to state: ***“Providing new housing and employment opportunities – ensuring the provision of new housing and employment opportunities in sustainable and accessible locations within the Borough.”***
- 4.3 VI 1 also explains that, *“[CWaC] would expect the larger settlements to have an individual vision”*. The *“larger settlements”* are stated to be: Chester; Ellesmere Port; Northwich; Winsford; Frodsham; and, Neston and Parkgate. However, as acknowledged in CWaC’s LPP1, *“to the east the borough borders Cheshire East and has particularly strong links with the town of Middlewich that is surrounded on three sides by Cheshire West and Chester”*⁷. The Borough’s strong connection to Middlewich is also recognised within the CWaC Issues and Options Document, within which it states that, *“Middlewich falls within Cheshire East but the built-up area is tightly enclosed to the east, west and north by the borough boundary with Cheshire West and Chester”*⁸. The Issues and Options Document further notes that Middlewich is identified as a Key Service Centre in the Cheshire East Local Plan. Therefore, although Middlewich sits outside of the administrative boundary of Cheshire West and Chester, it is clear that the Borough has strong links to this town and, thus, it is important that Middlewich is recognised within the spatial strategy of the emerging Local

⁷ CWaC, 2015, *Local Plan (Part One) Strategic Policies*, paragraph 1.2

⁸ CWaC, 2025, *Local Plan: Issues and Options (Regulation 18)*, page 127

Plan (as is currently the case under LPP1 Policy STRAT 7) and that this is also reflected in the 'vision' for the Borough.

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

- 4.4 As detailed above, no reference is made to the provision of new housing and employment opportunities within the four “*overarching principles*” that are currently referred to in VI 1, despite new homes and jobs being central to achieving the stated vision. Therefore, an additional overarching principle should be added to state: **“Providing new housing and employment opportunities – ensuring the provision of new housing and employment opportunities in sustainable and accessible locations within the Borough.”**

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

- 4.5 In principle, NPL agrees with the approach of establishing concise visions for the key places identified in the new Local Plan. However, as emphasised above, despite being located outside of the Borough, Middlewich is a key place that should also be identified in the new Local Plan owing to its strong connection to the Borough.

Suggested Policy Approach OB 1 – Objectives

Question 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*

- 4.6 As explained at Section 3 of these representations, the new standard method has resulted in a substantial increase in CWaC’s LHN figure from 532dpa to 1,914dpa (259.77% increase). Furthermore, the Council has a five-year housing land supply position of 1.89 years. Therefore, there is clearly a need to develop on suitable sites that are located outside of the current settlement boundaries, such as in the Open Countryside. Consequently, Option A ‘*Take forward the current Local Plan objectives*’ is not an appropriate approach, particularly as objective SO10 refers to “*maintaining the general extent and character of the North Cheshire Green Belt and Cheshire countryside*”.

4.7 Comments pertaining to Option B are provided in answer to Question OB 5 below.

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

4.8 NPL does not agree with the option of taking forward the current Local Plan objectives into the new Local Plan ('Option A') for the reasons detailed in NPL's response to Question OB 1 above.

Question OB 4: *Do you think that objectives S01, S03, S09, S010 need to be amended if they are to be taken forward into the new Local Plan? Do you have any suggestions for how they should be amended?*

4.9 As detailed above, the new standard method has resulted in a substantial increase in CWaC's LHN figure from 532dpa to 1,914dpa (259.77% increase). This is a considerable increase when compared to the current Local Plan requirement of 1,100dpa. It is important that the future housing needs of CWaC are rooted in the new standard method to ensure that the new Local Plan is robust. Therefore, the previous Local Plan objectives, particularly objective S010, cannot be taken forward into the new Local Plan and must instead be updated to reflect the Borough's substantial housing needs.

Question OB 5: *Do you feel that the option of using the Sustainability Appraisal objectives in the new Local Plan, as set out in Option B 'Use the Sustainability Appraisal objectives' above, is an appropriate approach?*

4.10 Any approach towards the new Local Plan objectives must ensure that it is reflective of the Borough's substantial housing needs (as detailed above). Furthermore, any future objectives must include the necessary flexibility to acknowledge that these are for development to comply with "where possible" to ensure that the viability and/or delivery of development would not be threatened.

Question OB 6: *If you do not feel this is an appropriate approach, are there any changes that you could suggest?*

4.11 Please see NPL's response to Question OB 5 (above).

Suggested Policy Approach SD 1 – Sustainable Development

Question 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?*

- 4.12 NPL supports the Council's commitment to mitigating and adapting to climate change. Nevertheless, where the new Local Plan seeks to introduce additional policy requirements that could threaten the viability and/or delivery of development, there must be a robust and flexible mechanism whereby these additional requirements and/or other requirements (such as affordable housing or other developer contributions) can be relaxed if viability is threatened. Therefore, NPL supports the use of words such as "maximise" and "minimise" within SD 1, which acknowledge that there is flexibility in the delivery of the stated measures to mitigate and/or adapt to climate change and should be incorporated within any prospective planning policy relating to sustainable development.

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

- 4.13 It is acknowledged that SD 1 currently states that,

"Strategic sites should be connected to a district heat network. Where this is not currently feasible, new homes should be built with the necessary infrastructure in place to enable such connections to be easily integrated in the future. Opportunities should be sought to connect commercial development producing sufficient levels of waste heat, with residential development or other developments with demand for heating, where they are located within close proximity."

- 4.14 NPL supports the Council's acknowledgement that connecting to a district heat network may not be feasible. NPL would not support an indiscriminate policy requirement for new development to connect to a district heat network or any other Local Plan policies that would threaten the viability and/or delivery of development.

Suggested Policy Approach SS 1 – Housing Needs

4.15 Paragraph 5.4 of the Issues and Options Document refers to the new standard method and states that, “*The figure for Cheshire West and Chester is a **minimum** of 1,914 new homes each year, and for a plan covering a 15-year period, this equates to a total figure of 28,710 new homes*” (Author’s emphasis in **bold**). NPL supports the Council’s recognition that a “*minimum*” of 1,914dpa is required both at paragraph 5.4 and within SS 1. However, this should be further acknowledged throughout the new Local Plan when citing the total figure in the relevant policies and supporting policy text to make it clear that 28,710 new homes across the 15-year Plan period is also a minimum figure.

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

4.16 There is no reason for the Council not to plan for delivering a minimum of 1,914 new homes each year. It is important that the future housing needs of CWaC are rooted in the new standard method to ensure that the new Local Plan is robust.

4.17 Further to the above, the Council’s Cabinet recently decided to adopt the Housing Strategy 2025-2035, within which it is acknowledged that “*...there are challenging times ahead, there is a national housing crisis, housing is less affordable, and many people have support needs making it even more difficult to access and sustain accommodation.*”⁹ Coupled with these challenges, the Housing Strategy acknowledges that the population of Cheshire West and Chester is forecast to increase by more than 10% by 2038. This further emphasises the clear need for new housing within the Borough.

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

4.18 The new Local Plan is being brought forward in the context of a substantial increase in CWaC’s LHN and a situation whereby the Council has an acute need for housing, with CWaC having 1.89 years’ supply of deliverable housing land. It is, therefore, important that sufficient land is allocated for housing delivery early in the Plan period.

⁹ CWaC, 2025, *Housing Strategy 2025-2035*, Page 13

Suggested Policy Approach SS 2 – Employment Needs

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

- 4.19 The Land Availability Assessment (“LAA”) Stage One 2025 excel document relating to employment identifies ‘Land off Holmes Chapel Road Middlewich (Cheshire Fresh plots SHA/0073a, c, d and e)’ as reference 1491. It is acknowledged within the aforementioned excel document that the site has extant planning permission and, for this reason, is within the employment land supply 2025 (allocations and planning permissions). However, the Employment Areas Survey (2024), despite referencing NPL’s previous representations to the 2023 consultation, does not include this site within the employment areas that are subsequently assessed in Table E.1. Furthermore, in the latest Annual Monitoring Report (“AMR”) (2024) for CWaC, the trajectory under indicator STRAT 2 (F) shows that for 2010-2030, there is sufficient provision of employment land to meet the Borough wide requirement of 365ha over the current Plan period, with overall provision amounting to 416.07ha.
- 4.20 As explained at Section 3 of these representations, NPL previously sought to promote the site as an employment-led allocation through the CWaC LPP2 and attended the Examination in Public. However, the site was not allocated as such and, instead, it is currently identified as ‘Open Countryside’. More recently, NPL submitted representations to CWaC in March 2024 to the Council’s consultations on the Stage 1 LAA and Draft Employment Areas Survey 2023. However, it is important to note that these representations were submitted ahead of the revised NPPF being published and the new standard method being introduced, which has resulted in a substantial increase in CWaC’s LHN (259.77% increase). As evidenced in the preceding sections of this report, there is an acute and serious level of housing need in Cheshire West and Chester. Therefore, there is a undeniable need to allocate sufficient, suitable sites through the new Local Plan to meet the Borough’s identified housing needs now and for the duration of the Plan-period.
- 4.21 The site does not comprise built-out employment space and, thus, residential-led development on the site would not limit the range, choice and quality of employment sites available to meet future employment needs in the Borough. Furthermore, the site is adjacent to the existing urban area of Middlewich, it is not within the Green Belt, and CEC has a good supply of employment land close to the site at Midpoint 18.
- 4.22 To the north-west of the site is a residential allocation (CEC Reference: SADPD Policy MID 2), to the west of which is established residential development. To the west of the site is

a restaurant and employment units, which comprise part of the Midpoint 18 allocated employment site (CEC Reference: LPS 44). Therefore, the site is an appropriate and sustainable location for residential-led, mixed-use development, which would be compatible with the neighbouring land uses and the character of the surrounding area, and would make a positive contribution towards meeting the Borough’s substantial housing needs and, thus, the site should be allocated accordingly in the new Local Plan.

Suggested Policy Approach SS 3 – Spatial Strategy Principles

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

4.23 SS 3 explains that new development and allocations will be directed towards previously developed sites within settlements first. It is stated that,

“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, as the next best sustainable option. Depending on the settlement this may require the release of Green Belt land.”

4.24 NPL supports the Council’s intention for development to be located on the edge of existing settlements in locations with the best access to public transport and existing services and infrastructure.

4.25 The site that is the subject of these representations is located on the edge of the existing settlement of Middlewich, which is identified as a Key Service Centre within the Cheshire East Local Plan, and has strong links to Cheshire West and Chester (as detailed in the preceding sections of these representations). Furthermore, it is important to note that the site comprises land currently identified as ‘Countryside’ as opposed to Green Belt.

4.26 Further to the above, the site has good accessibility including to public transport and existing services and infrastructure, including:

- **Active Travel** – The majority of Middlewich centre lies within 2km walking distance of the site and within a 5km cycle ride.
- **Bus** – The nearest bus stops are located on Centurion Way, c. 800m to the northwest of the site, and can be accessed within a 10-11 minute walk. These provide access to

Congleton, Crewe, and Leighton via the No. 42. Further bus stops are located within Middlewich Town Centre, c. 1.29km to the southwest of the site, and can be accessed via a 15-17 minute walk from the Site. These provide an additional service, the No. 37, which provides access to Northwich, Winsford, Sandbach, and Crewe.

- **Rail** – The nearest rail station to the site is Winsford railway station, which is located approximately 4.9km from the site. Furthermore, it is important to note that there are plans for a train station to be delivered in Middlewich in the future¹⁰. The train station is expected to come forward as part of the “Brooks Lane” Strategic Location LPS 43 (identified within the Cheshire East Local Plan Strategy 2010-2030), which is located approximately 1km to the south-west of the site (as referred to at paragraph 12.4 of the Issues and Options Document).

4.27 Additionally, the site is well located in terms of the strategic road network being only 2.5km from Junction 18 of the M6, which provides links south towards Stoke-on-Trent, Stafford and Birmingham, as well as links north towards Manchester. Moreover, the Middlewich Eastern Bypass (“MEB”), for which funding was recently confirmed by the Department for Transport¹¹, will provide a new access road into the site.

Suggested Policy Approach SS 4 – Settlement Hierarchy

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

4.28 SS 4 explains that the new Local Plan will set out a settlement hierarchy and outlines that an individual place-based policy for each settlement will set out the vision, core features, key issues and a clear strategy for what development will take place in each settlement.

4.29 As detailed earlier within these representations, the current and emerging Local Plan both acknowledge the strong links that the Borough has with the town of Middlewich, which is surrounded on three sides by Cheshire West and Chester and is identified as a Key Service Centre in the Cheshire East Local Plan. Therefore, although Middlewich sits outside of the administrative boundary of Cheshire West and Chester, it is important that Middlewich is

¹⁰ Land for a new railway station is allocated within the Cheshire East Local Plan as part of Strategic Location LPS 43 'Brooks Lane, Middlewich.

¹¹ Cheshire East Council, 2025, *Government approval given to Middlewich Eastern Bypass*, Available online: https://www.cheshireeast.gov.uk/council_and_democracy/council_information/media_hub/media_releases/government-approval-given-to-middlewich-eastern-bypass.aspx

recognised within the spatial strategy of the emerging Local Plan (as is currently the case under LPP1 Policy STRAT 7) and that this is referred to in any settlement hierarchy established by the new Local Plan.

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

- 4.30 If, contrary to NPL's comments in regard to Question SS 5, the Council decides not to recognise Middlewich within the settlement hierarchy, it is important that development adjacent to the settlement of Middlewich is supported in any case, as it is clear that Middlewich has strong links to Cheshire West and Chester (as detailed above).
- 4.31 The site that is the subject of these representations is adjacent to the urban area of Middlewich and, thus, presents a logical and appropriate location for residential-led, mixed-use development.

Suggested Policy Approach SS 5 – Spatial Strategy Options

Question SS 11: *Please select the option which is the most appropriate spatial 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*

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

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

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

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

- 4.32 It is understood that:

- Option A seeks to retain the Green Belt by focussing development on settlements without Green Belt constraints;
- Option B seeks to follow the current Local Plan level and distribution of development with reference to the settlement hierarchy by locating most new development on the edge of main urban areas or around smaller settlements which have adequate services, facilities and access to public transport; and,
- Option C seeks to focus development around settlements on the railway network or main bus route corridors.

4.33 As detailed above, the new standard method has resulted in a substantial increase in CWaC's LHN figure from 532dpa to 1,914dpa (259.77% increase). This is a considerable increase when compared to the current Local Plan requirement of 1,100dpa. It is important that the future housing needs of CWaC are rooted in the new standard method to ensure that the new Local Plan is robust. Therefore, the new Local Plan must allocate sites beyond the existing settlement boundaries to meet its substantial housing needs.

4.34 The site is located on the edge of the urban area of Middlewich, which is identified as a Key Service Centre within the Cheshire East Local Plan, and has strong links to Cheshire West and Chester (as detailed in the preceding sections of these representations). As detailed above, the site has good accessibility to public transport, including bus services and a railway station is planned in Middlewich. Furthermore, it is important to note that the site comprises land currently identified as 'Countryside' as opposed to Green Belt.

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

4.35 As detailed earlier within these representations, Middlewich has strong links to Cheshire West and Chester and, thus, it is important that development adjacent to the settlement of Middlewich is supported.

4.36 The site that is the subject of these representations is adjacent to the urban area of Middlewich and, thus, presents a logical and appropriate location for residential-led, mixed-use development.

Question 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?*

4.37 Please see NPL's response to SS 12.

Potential Growth Areas

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

4.38 As detailed in the preceding sections of these representations, the site is currently identified as being in the Open Countryside, as opposed to Green Belt. However, the site benefits from an extant planning permission for a major mixed-use development, which includes some retail uses. Therefore, as a result of the consented scheme, it is understood that built development at scale can be acceptable at the site in planning policy and technical terms. Furthermore, the site is well-related to the existing urban area, being situated adjacent to Middlewich. Additionally, since the hybrid planning permission was granted, not only has there been a change in the planning policy context (i.e., the increased LHN and the emphasis on accelerating housebuilding), but the site's physical context has changed, with a site for around 75 new homes allocated in CEC's SADPD (Policy MID 2) to the north of Holmes Chapel Road, and funding having recently been confirmed for the Middlewich Eastern Bypass ("MEB")¹².

4.39 Therefore, the site represents a logical and appropriate location to deliver a high-quality residential-led, mixed-use development, which would contribute positively towards meeting the identified need for housing within the Borough, and, thus, the site should be allocated accordingly in the new Local Plan.

Question 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?*

4.40 As detailed earlier within these representations, Middlewich has strong links to Cheshire West and Chester and, thus, it is important that development adjacent to the settlement of Middlewich is supported.

4.41 The site that is the subject of these representations is adjacent to the urban area of Middlewich and, thus, presents a logical and appropriate location for residential-led, mixed-use development.

¹² Cheshire East Council, 2025, *Government approval given to Middlewich Eastern Bypass*, Available online: https://www.cheshireeast.gov.uk/council_and_democracy/council_information/media_hub/media_releases/government-approval-given-to-middlewich-eastern-bypass.aspx

Suggested Policy Approach MI 1 – Middlewich

4.42 Map 12.1 of the Issues and Options Document is stated to show the ‘Middlewich area and key constraints’ (Map 12.1 is below for ease of reference).

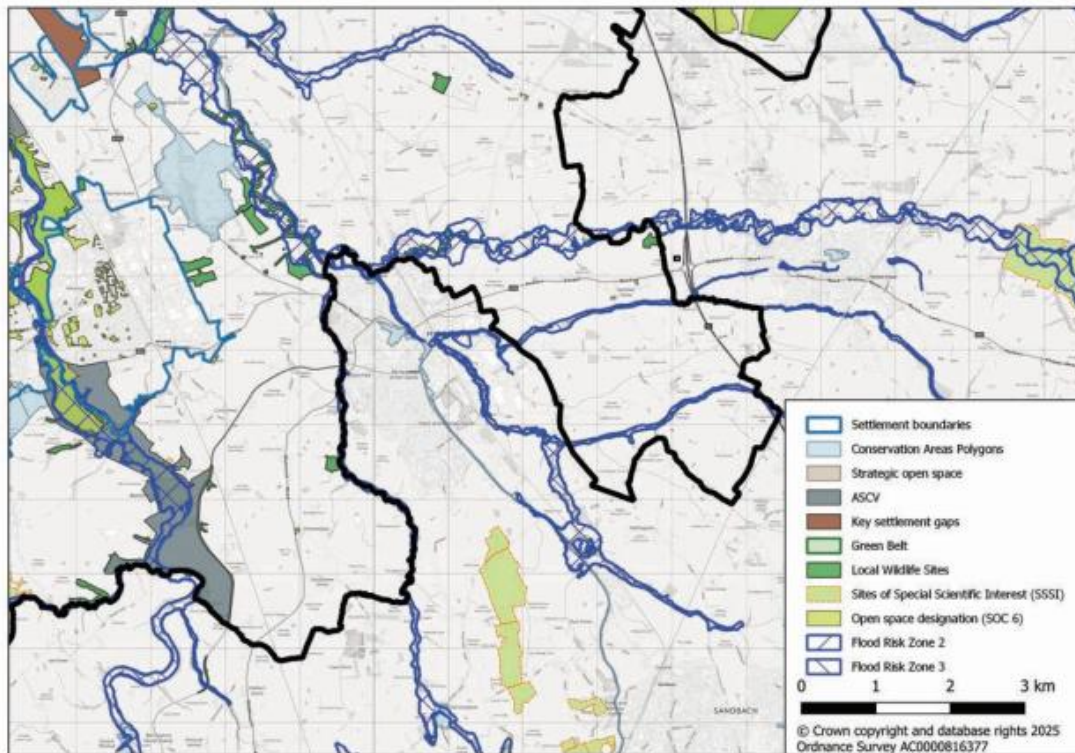


Figure 1: Map 12.1 of the Issues and Options Document

4.43 Map 12.1 shows that there are no ‘key constraints’ that would preclude the redevelopment of the site for residential-led, mixed-use development. This is supported by the assessment of technical and environmental considerations presented earlier in these representations and is evidenced by the site having been granted consent (which is extant) for major mixed-use development at scale.

Suggested Policy Approach M1 – Middlewich

Question MI 1: Do you agree with the suggested policy approach towards Middlewich, as set out in MI 1 ‘Middlewich’ above? If not, please suggest how it could be amended?

4.44 M1 sets out the Council’s commitment to “take a pragmatic approach to avoid delays to plan-making to enable land in Cheshire West to meet future needs in Middlewich”. NPL strongly supports this approach, which is necessary in the context of Cheshire West and Chester’s substantial housing needs and its strong links to the town of Middlewich.

4.45 The allocation of the site for residential-led, mixed-use development would, thus, be entirely logical and appropriate and would help to fulfil the Council’s stated intention of enabling land in Cheshire West to meet future needs in Middlewich in the immediate-term.

Question MI 2: *What issues should be considered through the Cheshire West and Chester Local Plan to ensure the future needs of Middlewich are properly considered?*

4.46 Notwithstanding Cheshire West and Chester’s substantial housing need, as evidenced by the 259.77% increase in its LHN requirement (532dpa to 1,914dpa) and by its housing land supply of 1.89 years, when considering Middlewich, it is also important to recognise that:

- The December 2024 LHN figure increased Cheshire East’s need to 2,461dpa. This equates to a 152% increase against the previous standard method (977dpa), or a 37% increase against Cheshire East’s adopted housing requirement (1,800dpa); and,
- Cheshire East Council’s (“CEC’s”) draft Housing Monitoring Update states that at 1st April 2024, CEC had a deliverable supply of 10,604 dwellings, which against the LHN and a 5% buffer equates to a supply 4.10 years.

4.47 Therefore, the future housing needs of Middlewich need to be considered not only in light of Cheshire West and Chester’s substantial housing needs, but also the immediate need for housing that has been identified in Cheshire East.

Question MI 3: *With the Cheshire West and Chester and Cheshire East Local Plans currently on different timelines, how can any potential future needs for Middlewich be met?*

4.48 Both boroughs have a clear and immediate need for housing. Therefore, the delivery of housing adjacent to Middlewich is required to come forward as soon as possible .

4.49 The site that is the subject of these representations is adjacent to the urban area of Middlewich and represents a logical and appropriate location to deliver a high-quality residential-led, mixed-use development. Therefore, the site should be allocated accordingly in the new Local Plan for Cheshire West and Chester to ensure that it can contribute positively towards meeting the current and future needs for Middlewich in the immediate-term.

Question MI 4: *Could land be safeguarded to be released for development, if a need was established through the Cheshire East Local Plan?*

4.50 As detailed above, there is a clear and identified need for housing in Cheshire East. Consequently, sites adjacent to Middlewich should be allocated for housing now, as opposed to being safeguarded to be released for development in the future.

4.51 The site presents a logical and appropriate location for residential-led development, mixed-use development and, thus, should be allocated as such as part of the new Local Plan.

Question MI 5: *What approach should be taken to the 'Cheshire Fresh' site and do you have any comments on other land put forward for future allocation around Middlewich?*

4.52 The site that is the subject of these representations forms the majority of the 'Cheshire Fresh' site. As explained at Section 3 of these representations, NPL previously sought to promote the site as an employment-led allocation through the CWaC LPP2 and attended the Examination in Public. However, the site was not allocated as such and, instead, it is currently identified as 'Open Countryside'. More recently, NPL submitted representations to CWaC in March 2024 to the Council's consultations on the Stage 1 LAA and Draft Employment Areas Survey 2023. However, it is important to note that these representations were submitted ahead of the revised NPPF being published and the new standard method being introduced, which has resulted in a substantial increase in CWaC's LHN (259.77% increase). As evidenced in the preceding sections of this report, there is an acute and serious level of housing need in Cheshire West and Chester. Therefore, there is a undeniable need to allocate sufficient, suitable sites through the new Local Plan to meet the Borough's identified housing needs now and for the duration of the Plan-period.

4.53 The site does not comprise built-out employment space and, thus, residential-led development on the site would not limit the range, choice and quality of employment sites available to meet future employment needs in the Borough. Furthermore, the site is adjacent to the existing urban area of Middlewich and is not within the Green Belt. To the north-west of the site is a residential allocation (CEC Reference: SADPD Policy MID 2), to the west of which is established residential development. To the west of the site is a restaurant and employment units, which comprise part of the Midpoint 18 allocated employment site (CEC Reference: LPS 44). Therefore, the site is an appropriate and sustainable location for residential-led, mixed-use development, which would be compatible with the neighbouring land uses and the character of the surrounding area, and would make a positive contribution towards meeting the Borough's substantial housing needs and, thus, the site should be allocated accordingly in the new Local Plan.

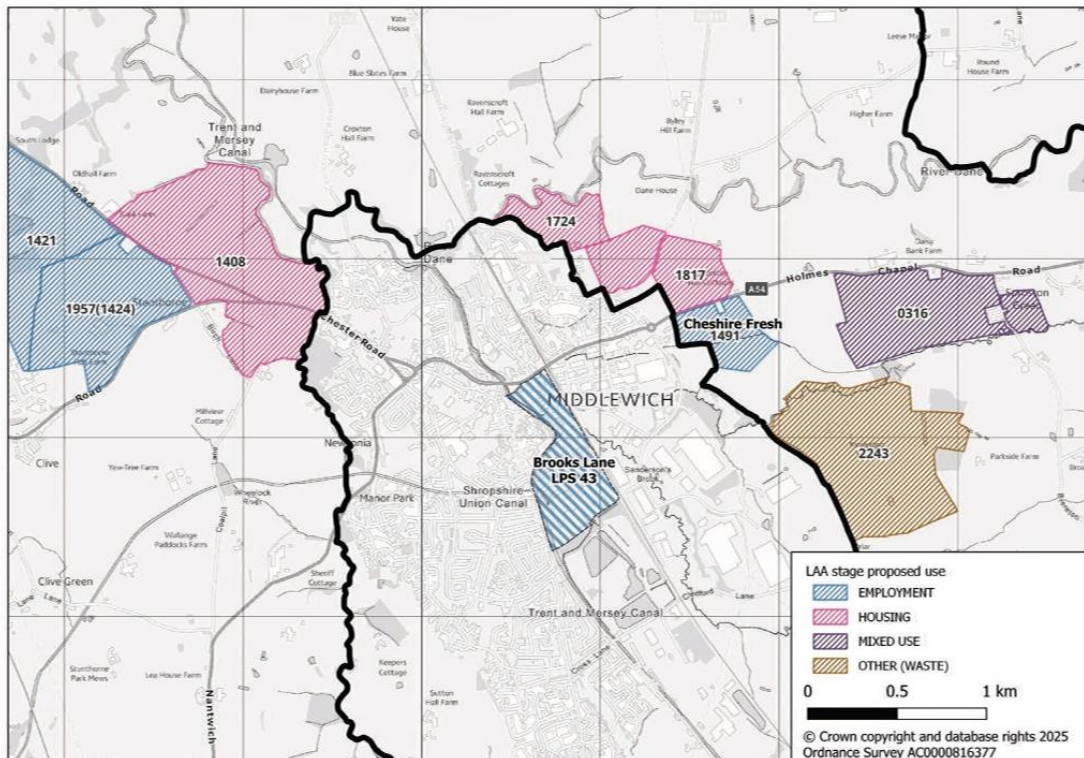


Figure 2: Map 12.2 of the Issues and Options Document

Suggested Policy Approach GB 1 – Green Belt and Countryside

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

Question GB 2: Should there be a separate policy for countryside and Green Belt areas?

4.54 It is NPL’s view that there should be a separate policy for Countryside and Green Belt areas. NPL reserves the right to comment further on any policy relating to development within the countryside at the appropriate time.

Suggested Policy Approach TA 1 – Transport and Accessibility

Question 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?*

- 4.55 TA 1 refers to new development being encouraged in “more sustainable locations, recognising that the approach to transport will vary depending on site location.” NPL supports the Council’s recognition that there should not be a ‘one size fits all’ approach to transport and that this will be influenced by locational factors. However, any prospective policy relating to transport and accessibility should also make it clear that development will be supported in locations where it is or can be made sustainable.
- 4.56 As detailed at Section 2 of these representations, the site is within an accessible location with access to sustainable modes of transport. Furthermore, the majority of Middlewich centre lies within 2km walking distance of the site and within a 5km cycle ride.

Suggested Policy Approach ID 1 – Infrastructure and Developer Contributions

Question 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.*

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

- 4.57 NPL acknowledges the Council’s suggested policy approach towards infrastructure and developer contributions, as detailed in ID 1. However, NPL would not support policy requirements that could threaten the viability and/or delivery of development. There must be a robust and flexible mechanism whereby these additional requirements and/or other requirements (such as affordable housing or other developer contributions) can be relaxed if viability is threatened. NPL reserves the right to comment further on the Council’s approach towards infrastructure and developer contributions at the appropriate time.

Question ID 2: *Should developer contributions only apply to major developments? How should 'major development' be defined?*

- 4.58 Annex 2 of the NPPF (2024) provides a definition of ‘major development’. Any reference to ‘major development’ within the new Local Plan should be consistent with national policy to ensure that the plan meets this test of soundness.

Suggested Policy Approach EG 1 – Economic Growth, Employment and Enterprise

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

Question EG 5: *Do you agree with the suggested policy approach towards the protection of employment land or premises?*

- 4.59 EG 1 states that the Borough’s employment land supply *“will be met through extant planning commitments, vacant/previously developed land in established employment areas, expansion land for specific employers or new allocations identified to meet strategic development needs.”*
- 4.60 It is further stated that *“Proposals for alternative uses on allocated employment land must not limit the range, type, choice and quality of employment land available to meet future employment needs”*, and goes on to explain when the redevelopment to non-employment uses will be permitted.
- 4.61 As detailed in the preceding sections of these representations, although the site has extant consent for mixed-use development and has, for this reason, been included within the employment land supply 2025 (allocations and planning permissions), the site does not comprise built-out employment space and was not allocated for employment use through the CWaC LPP2. Therefore, residential-led development on the site would not limit the range, choice and quality of employment sites available to meet future employment needs in the Borough. Furthermore, the site is adjacent to the existing urban area of Middlewich and is not within the Green Belt. To the north-west of the site is a residential allocation (CEC Reference: SADPD Policy MID 2), to the west of which is established residential development. To the west of the site is a restaurant and employment units, which comprise part of the Midpoint 18 allocated employment site (CEC Reference: LPS 44). Therefore, the site is an appropriate and sustainable location for residential-led, mixed-use development, which would be compatible with the neighbouring land uses and the character of the surrounding area, and would make a positive contribution towards meeting the Borough’s substantial housing needs and, thus, the site should be allocated accordingly in the new Local Plan.

4.62 Notwithstanding the above, any prospective policy relating to economic growth, employment and enterprise must include the necessary flexibility to allow for the redevelopment of employment sites to non-employment uses or employment uses outside of Use Classes B2, B8 and E(g), i.e., retail uses, to ensure that the Borough is able to effectively respond to changes in market conditions and demands over the Plan period.

Suggested Policy Approach TC 1 – Town Centres

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

Question TC 2: *Do you agree with requiring consideration of previously developed sites within the catchment of the proposal, or available and suitable sites that have a main town centre use permission, as part of the sequential test?*

Question TC 3: *Do you agree with retaining the centre hierarchy?*

4.63 Paragraph 17.6 of the Issues and Options Document refers to a Retail Study, which is currently in preparation. It is stated that the Retail Study “*will identify the need for future retail and leisure floorspace including for food and non-food retail.*” It is further stated that, “*The new Local Plan will need to reflect this evidence base.*” NPL reserves the right to comment on the Retail Study at the appropriate time.

4.64 The site benefits from an extant planning permission for a major employment-led mixed-use development, which includes some retail uses. The maximum quantum of development approved under the hybrid planning permission is detailed at condition 11 and is provided below for reference. However, it is important to note that the condition details the former Use Classes; the current Use Classes were last updated on 1st September 2020:

a) *“The business and offices areas (use class B1 and A2) will comprise a maximum of 1,800sqm (gross internal area);*

b) *The starter industrial areas (use class B1 and B2) will comprise a maximum of 2,400sqm (gross internal area);*

c) *The food production areas (use class B1 and B2) will comprise a maximum of 2,650sqm (gross internal area);*

d) *The light industrial, manufacturing and distribution areas (use class B2 and B8) will comprise a maximum of 9,500sqm (gross internal area);*

e) *The veterinary practices (use class D1) will comprise a maximum of 700sqm (gross internal area); and,*

f) *The restaurant and café areas (use class A3 and A5) will comprise a maximum of 232sqm (gross internal area)."*

4.65 The site offers the potential to include retail uses alongside housing. It is well-established that retail uses can be complementary to housing and employment development. Furthermore, NPL has undertaken a Retail Impact Report, which has been submitted to CWaC as part of a recent pre-application request in relation to the site, which considers the retail impact associated with the provision of a foodstore/foodstores on the site.

Suggested Policy Approach HO 1 – Mix and Type of Housing in New Developments and Specialist Housing

Question 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 'Mix and type of housing in new developments and specialist housing' above? If not please suggest how it could be amended?*

Question 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?*

4.66 The supporting text to HO 1 states that a Housing Need Assessment is being prepared, which it is stated *"will provide the basis for delivering the mix of homes required and requirement for affordable housing."* NPL reserves the right to comment on the Housing Need Assessment at the appropriate time, particularly as it is noted that the Council intends for this assessment to provide the basis for new Local Plan policies relating to the mix of housing. Nevertheless, it is important that any prospective planning policy relating to housing mix allows for flexibility owing to this being dependent on site and market factors. Therefore, if the Council is intending to *"provide detailed policy requirements e.g. % of 1-2 bed dwellings including by tenures; % of plots for self-build and custom housebuilding..."* (as detailed in HO 1), these percentages should be labelled as 'indicative'. Furthermore, the future planning policy should acknowledge that the mix should be proportionate to the scale of the development proposed.

Suggested Policy Approach HO 2 – Delivering Affordable Housing

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

4.67 NPL acknowledges the Council’s intention within HO 2 for affordable homes to be sought within all new housing developments unless there are exceptional circumstances which can be demonstrated to justify off-site contributions.

4.68 The delivery of suitable and achievable sites for residential-led, mixed-use development, such as the site, provide an excellent opportunity to deliver a mix of affordable housing to meet local needs.

Question HO 5: *Do you have any views on thresholds for affordable housing in relation to applying a lower threshold for designated rural areas and what approach could be taken to parts of the borough not subject to the designation?*

4.69 The thresholds for affordable housing should be consistent with national planning policy. Therefore, in accordance with paragraph 65 of the NPPF (2024), the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).

Suggested Policy Approach HO 3 – Proposals for Residential Development

Question HO 6: *Do you agree with the suggested policy approach for residential development proposals, as set out in HO 3 'Proposals for residential development' above? If not, please suggest how it could be amended?*

Question HO 7: *Are Local Plan (Part Two) policies DM 19, DM 21 and DM 22 working effectively; remain relevant; or are all issues covered by current national policy and guidance?*

4.70 It is understood that the Council intends for LPP2 Policy DM 19 to be retained as a separate policy or the general principles incorporated into other policies of the new Local Plan. NPL reserves the right to comment further on any policy relating to development within the countryside at the appropriate time.

Suggested Policy Approach – Open Space, Sport and Recreation

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

Question OS 2: *Are the current thresholds for developer contributions for open space and playing pitches suitable, or do you have any comments or suggestions for what they should be?*

Question OS 4 *Should the policy approach be more flexible in the order provision of open space in new developments? If yes, do you have any suggestions how this could be achieved?*

- 4.71 NPL notes the Council’s intention for developer contributions to be required for playing pitches based on additional demand generated by new residential development, and for open space provision in new developments being sought firstly on-site, secondly off-site, and thirdly via a financial contribution. NPL does not object to these policy intentions in principle, however, where the new Local Plan seeks to introduce additional policy requirements that could threaten the viability and/or delivery of development, there must be a robust and flexible mechanism whereby these additional requirements and/or other requirements (such as affordable housing or other developer contributions) can be relaxed if viability is threatened.

Suggested Policy Approach G1 – Green Infrastructure, Biodiversity and Geodiversity

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

Question GI 2: *Should new development contribute to woodland in Cheshire West and Chester? 5. Is a 2:1 ratio enough for a tree replacement policy?*

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

- 4.72 NPL notes the suggested policy approach towards green infrastructure, biodiversity and geodiversity. The Environment Act requires 10% Biodiversity Net Gain for new developments and, thus, the new Local Plan should be consistent with the law.
- 4.73 It is understood that G1 is intending to retain the Council’s existing planning policy relating to replacement tree planting, but to add detail such as tree species and quantity. Any prospective planning policy relating to tree planting/cover must allow flexibility, as there should not be a ‘one size fits all’ approach to landscaping within new developments. This is equally as important when considering the Council’s intention for all external edges of

all new development to have hedgerows, which it is stated *“would be secured with an agreement specifying type/species and nature of hedgerow.”* A restrictive policy requirement to this effect would not be supported, not least because there may be security or other design-related reasons where external edges of development cannot be planted with hedgerow.

Suggested Policy Approach DS 1 – High Quality Design

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

4.74 NPL notes that the Council is currently preparing a borough-wide Design Code, setting out the design requirements for developments in Cheshire West, which it is intended will form part of the evidence base for the relevant policies relating to design and sustainable construction. NPL reserves the right to comment on this document at the appropriate time.

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

4.75 The Council’s Design Code should be treated as a Supplementary Planning Document, which should be produced in accordance with Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012. As explained in the Planning Practice Guidance,

“Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.”¹³

4.76 As stated above, NPL reserves the right to comment on the Council’s Design Code at the appropriate time. However, NPL considers that there is no reason to depart from the Planning Practice Guidance. Therefore, it should be made clear that the Design Code is a

¹³ Planning Practice Guidance, Paragraph: 008 Reference ID: 61-008-20190315
Revision date: 15 03 2019

material consideration in decision-making, but that it does not form part of the Development Plan.

Suggested Policy Approach DS 2 – Sustainable Construction

Question DS 4: *Do you agree with the suggested policy approach towards sustainable construction, as set out in DS 2 'Sustainable construction' above? If not please suggest how it could be amended?*

Question DS 5: *Do you think that the new Local Plan should adopt the National Design Guide energy hierarchy – or is there an alternative?*

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

Question 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?*

- 4.77 NPL supports the Council’s commitment to mitigating and adapting to climate change. Nevertheless, where the new Local Plan seeks to introduce additional policy requirements that could threaten the viability and/or delivery of development, there must be a robust and flexible mechanism whereby these additional requirements and/or other requirements (such as affordable housing or other developer contributions) can be relaxed if viability is threatened.
- 4.78 Further to the above, prospective planning policies relating to sustainable construction should be consistent with, and not go beyond, the requirements of Building Regulations to avoid duplication and inconsistencies.
- 4.79 DS 2 refers to carbon/energy off-setting and the potential to allow for a financial contribution to off-set any remaining residual carbon or energy. It also refers to the potential for the prospective policy to require carbon reporting and/or set a target that new buildings must meet. NPL reserves the right to comment on these potential policy requirements once further detail is received.

Suggested Policy Approach DS 3 – Climate Adaptation

Question DS 10: Do you agree with the suggested policy approach towards climate adaptation, as set out in DS 3 'Climate adaptation' above? If not please suggest how it could be amended?

- 4.80 NPL supports the Council's commitment to mitigating and adapting to climate change. Nevertheless, where the new Local Plan seeks to introduce additional policy requirements that could threaten the viability and/or delivery of development, there must be a robust and flexible mechanism whereby these additional requirements and/or other requirements (such as affordable housing or other developer contributions) can be relaxed if viability is threatened.

Suggested Policy Approach EN 4 – Sustainable Energy and Heat

Question EN 5: Do you agree with the suggested policy approach towards energy, as set out in EN 4 'Sustainable energy and heat' above? If not please suggest how it could be amended?

- 4.81 EN 4 states that, "All major schemes and schemes involving significant generation or use of heat should explore opportunities for linking to district heat networks or other users/providers of heat. All major schemes should consider the potential to use ground source heat from private or public green spaces or water source heat solutions to contribute to heating requirements. All schemes requiring provision of heat should consider use of air source heat pumps or ground source heat pumps as an alternative to fossil fuel based heat sources."
- 4.82 As detailed in NPL's response to SD 2, NPL would not support an indiscriminate policy requirement for new development to connect to a district heat network or any other Local Plan policies that would threaten the viability and/or delivery of development.

Suggested Policy Approach MISC 2 – Jodrell Bank

Question MISC 2: Do you agree with the suggested policy approach towards the Jodrell Bank consultation zone, as set out in MISC 2 'Jodrell Bank' above? If not please suggest how it could be amended?

- 4.83 It is understood that the Council proposes to retain the content of LPP2 Policy DM 12 and show the associated consultation zone on the policies map.
- 4.84 As demonstrated by the hybrid planning permission granted at the site, built development at scale has already been consented on the site and, thus, can be acceptable at the site in

planning policy and technical terms. Furthermore, Jodrell Bank had no objection to the hybrid planning application, subject to electromagnetic screening materials being incorporated into the design of the buildings.

- 4.85 As part of any prospective planning application at the site, the impact of the proposed development on Jodrell Bank, both in terms of the potential electromagnetic interference of the proposed development and its impact on the WHS, would be assessed.

5 A DELIVERABLE SITE

Deliverability

5.1 The NPPF seeks to ensure that deliverable sites are provided in appropriate locations to meet housing needs and support economic growth. To be considered deliverable, sites should be available, suitable and achievable and should be available to be brought forward within a realistic timeframe once a Local Plan is adopted.

Available

5.2 The site is controlled by NPL. As detailed at Section 1 of these representations, NPL has a strong track record in delivering high-quality mixed-use schemes which combine residential, employment, and logistics space, demonstrating consistent capability in unlocking strategic land and delivering long-term benefits.

5.3 Further to the above, NPL has strong connections with the development industry and would work with the relevant partners to deliver a high-quality residential-led, mixed-use development on the site, which could be delivered early within the Plan period.

Suitable

- 5.4 The site is suitable for residential-led, mixed-use development for the following reasons:
- The site is located adjacent to the urban area of Middlewich and has a strong existing landscape framework. Therefore, the site provides an opportunity for a logical extension to the existing urban area;
 - There are no environmental or technical constraints that would prevent the development of the site, subject to suitable mitigation and a sensitive approach to design; and,
 - Built development at scale has already been consented on the site and, thus, can be acceptable at the site in planning policy and technical terms.

Achievable

5.5 An assessment of the technical and environmental considerations illustrate that the delivery of the site is achievable; this is further emphasised by the extant hybrid planning permission at the site. Any future development proposals will be supported by a suite of technical reports prepared by a professional team of technical experts.

Key Benefits

5.6 Paragraph 8 of the NPPF (2024) highlights that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways, so that opportunities can be taken to secure net gains across each of the different objectives: economic; social; and, environmental.

5.7 The delivery of the site for residential-led, mixed-use development will provide significant benefits to the Borough and its community. These are summarised as follows:

Economic

5.8 The proposed development will contribute towards building a strong, responsible and competitive economy. Specifically, development of the site would:

- Support direct and indirect employment, especially through supporting construction-related jobs and in the wider economy through the duration of the build programme;
- Increase the supply of labour by providing homes for economically active and employed residents;
- Contribute to spending in the local economy and, once built and occupied, the households will generate additional spend per annum on goods within the Borough; and,
- Increase Council Tax income through the construction of new homes.

Social

5.9 The proposed development will support strong, vibrant and healthy communities. In particular, the development of the site would:

- Deliver a high-quality residential-led, mixed-use development in a suitable and appropriate location on the edge of the urban area of Middlewich, which would contribute positively towards meeting the identified need for housing within the Borough;
- Deliver affordable housing and be capable of providing a choice of affordable housing tenures, in accordance with the demand in the local area and across CWaC;
- Be capable of delivering a mix of housing types, meeting the Borough's identified needs;

- Include private and shared amenity space on-site for prospective residents and the local community; and,
- Create a safe and welcoming environment by ensuring that the proposed development is landscape-led and responds positively to the surrounding area.

Environmental

5.10 The proposed development will not result in significant harm to the natural environment and will help to improve biodiversity. In particular, the development of the site would:

- Achieve a Biodiversity Net Gain (“BNG”) of at least 10%. The mitigation hierarchy would be followed and habitat would be provided on site where possible;
- Deliver much-needed housing on the edge of the urban area of Middlewich, with good access to sustainable modes of transport;
- Incorporate a high-quality landscape scheme; and,
- Be capable of delivering an energy efficient development.

6 CONCLUSIONS AND RECOMMENDATIONS

- 6.1 These representations have been prepared by Asteer on behalf of NPL in response to the CWaC Issues and Options Consultation, running from 4th July 2025 until 29th August 2025. These representations provide a response to the Issues and Options Consultation specifically in relation to land under NPL's control at A54 Holmes Chapel Road / Pochin Way, Middlewich ("the site"). A Site Location Plan is enclosed at **Appendix 1**.
- 6.2 NPL previously sought to promote the site as an employment-led allocation through the CWaC LPP2 and attended the Examination in Public. However, the site was not allocated as such and, instead, it is currently identified as 'Open Countryside'. More recently, NPL submitted representations to CWaC in March 2024 to the Council's consultations on the Stage 1 Land Availability Assessment and Draft Employment Areas Survey 2023. However, it is important to note that these representations were submitted ahead of the revised NPPF being published and the new standard method being introduced. Since this time, there has been a clear and significant shift in the Government's economic agenda, which clearly sees housebuilding as key to unlocking and driving economic growth and recognises the "*chronic housing crisis*" that the country is facing (as detailed earlier in these representations).
- 6.3 As demonstrated by CWaC's five-year housing land supply position and the substantial increase in the Borough's LHN (259.77% increase), it is clear that there is an acute and serious level of housing need in Cheshire West and Chester. Therefore, there is a undeniable need to allocate sufficient, suitable sites through the new Local Plan to meet the Borough's identified housing needs now and for the duration of the Plan-period.
- 6.4 The site that is the subject of these representations is currently allocated as Open Countryside in CWaC's adopted Local Plan; it is not within the Green Belt and is bound by the existing urban area of Middlewich to the east. Furthermore, the site has extant planning permission for major mixed-use development and development has lawfully commenced on the site (as detailed at Section 2 of these representations). Therefore, as a result of the consented scheme, it is clear that built development at scale can be acceptable at the site in planning policy and technical terms. Additionally, since the hybrid planning permission was granted, not only has there been a significant change in the planning policy context (i.e., the increased LHN and the Government's emphasis on accelerating housebuilding), but the site's physical context has changed/is changing, with a site for around 75 new homes allocated in CEC's SADPD (Policy MID 2) to the north of Holmes Chapel Road and funding having recently been confirmed for the MEB.

- 6.5 NPL has strong connections with the development industry and would work with the relevant partners to deliver a high-quality residential-led, mixed-use development on the site, which could be delivered early within the Plan period.
- 6.6 Consequently, the site represents a suitable and appropriate location to deliver a high-quality residential-led, mixed-use development, which would contribute positively towards meeting the identified need for housing within the Borough, and, thus, the site should be allocated accordingly in the new Local Plan.
- 6.7 NPL is committed to demonstrating the site's deliverability and suitability as a residential-led, mixed use allocation as the emerging Local Plan is progressed and would welcome continued engagement with the Council as the consultation responses are considered. NPL would be happy to discuss any feedback regarding these representations or in relation to the site specifically.

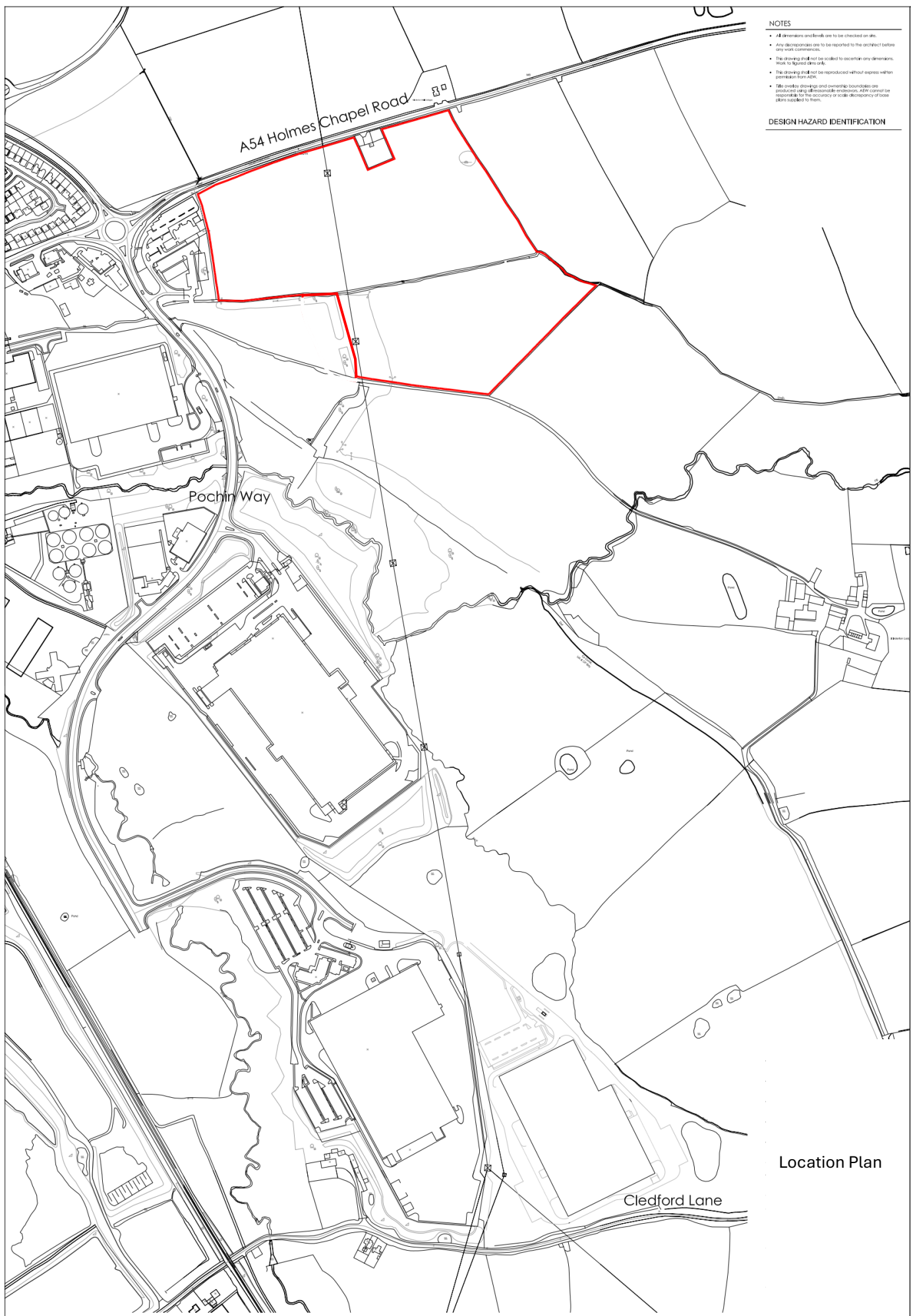
APPENDIX 1

Site Location Plan

NOTES

- All dimensions and breaks are to be checked on site.
- Any discrepancies are to be reported to the architect before any work commences.
- The drawing shall not be scaled to ascertain any dimensions, read to figure dimensions.
- This drawing shall not be reproduced without express written permission from AEC.
- The overall drawing and detailing boundaries are produced in the electronic enclosure. AEC cannot be held responsible for the accuracy or scale discrepancy of base plans supplied to them.

DESIGN HAZARD IDENTIFICATION



A54 Holmes Chapel Road

Pochin Way

Cledford Lane

Location Plan

