



Cheshire West and Chester Local Plan Representations

On behalf of Tata Chemicals Europe

Local Plan Review

Prepared for

Tata Chemicals Europe

**August 2025
5285-01-REPS**



Document Control

| Revision | Date | Prepared By | Reviewed / Approved By |
|--------------|-------------|-------------|------------------------|
| 5285-01-REPS | August 2025 | CF | |
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1.0 INTRODUCTION

1.1 Background

- 1.1.1 This representation has been produced by Axis on behalf of Tata Chemicals Europe Limited (TCEL) in response to the Regulation 18 Issues and Options (I&O) consultation on the Cheshire West and Chester Local Plan prepared by Cheshire West and Chester Council (CWAC or 'the Council').
- 1.1.2 The Council has embarked on preparing a new Local Plan for Cheshire West and Chester under the current plan-making system, with the option to switch to the new plan-making system should it prove necessary and expedient to do so.
- 1.1.3 The I&O document is the first formal stage in producing a new Local Plan and the Council are seeking views on whether the right issues have been identified, and which options are best for addressing the identified issues.
- 1.1.4 The new Local Plan will create a single Local Plan document, replacing the existing Local Plan (Part One) and Local Plan (Part Two) policies.
- 1.1.5 The purpose of this representation is to provide initial comments on behalf of TCEL on the proposed scope and content of the Local Plan, and specifically the policies relating to industrial development, renewable energy development and Northwich Town.

1.2 Contact Details

- 1.2.1 TCEL is one of Europe's leading producers of sodium carbonate (Soda Ash), Pure Dried Vacuum (PDV) Salt and Sodium Bicarbonate and other associated products, from its plants located in Northwich (Winnington and Lostock) and in Middlewich.
- 1.2.2 TCEL's high-quality Soda Ash is used in the manufacture of glass, detergents and chemicals and in several other industrial applications. TCEL's many grades of Sodium Bicarbonate (manufactured at the Winnington plant) have applications ranging from haemodialysis and pharmaceuticals, food and animal feed, flue gas treatments through to detergents and personal care products.
- 1.2.3 The existing CHP Power Plant at Winnington was commissioned in 2000. The highly efficient plant generates 96MW of electricity and up to 400MW of heat in the form of steam for use by TCEL to produce Sodium Bicarbonate. The CHP Power Plant also provides heat and electricity to local industrial users and supplies electricity to the



local distribution network for use by consumers and businesses as well as supporting the wider UK electricity system.

1.3 Sites Relevant to this Representation

1.3.1 TCEL own and operate four sites within Cheshire West and Chester that are relevant to this representation. The four sites are as follows:

- i) Winnington Works
- ii) Winnington Limebeds
- iii) Lockstock Works
- iv) Lockstock Limebeds

Winnington Works

1.3.2 The Winnington Works Site is located to the north of Winnington Lane (A533), Winnington, Northwich on the southern bank of the River Weaver directly opposite the Anderton Boat Lift. It comprises a large complex of industrial plant and buildings. However, many of the plant and buildings on-site have been removed following formal decommissioning in 2013, in advance of residential led redevelopment.

1.3.3 The Winnington Works Site is currently allocated under Policy N 2.B of the Local Plan (Part Two) as a regeneration area for redevelopment to a comprehensive mixed use residential, neighbourhood retail and employment development.

1.3.4 TCEL support the existing allocation at the site, and separate representations have been made by Gladman Developments to the I&O with regard to the Winnington Works Site. In addition to representations made by Gladman Developments in respect of the site, we believe that the new Local Plan should continue to support modern waste management and energy-related development on the remainder of the site located outside of the land allocated under Policy N2.B.

Winnington Limebeds

1.3.5 The Winnington Limebeds comprise circa 56 hectares of former deposit grounds located to the west of Winnington Avenue and to the north of Wallerscote, Winnington, Northwich.

1.3.6 The site is not allocated in the current Local Development Plan. Representations were previously made on behalf of TCEL in response to the Council's Land



Availability Assessment and Call for Sites that took place between January and March 2024. The representation stated that the Winnington Limebeds should be allocated for renewable energy opportunities to encourage the redevelopment of previously developed land.

- 1.3.7 A planning application (ref. 23/02766/FUL) for the re-engineering, remediation and restoration of the limebeds and the subsequent installation of a commercial scale photovoltaic solar park and battery energy storage system was allowed at appeal (ref. APP/A0665/W/25/3359308) on 21 July 2025, following examination by a Secretary of State appointed, independent inspector at public hearing.
- 1.3.8 Ahead of implementation of any planning permission, the new Local Plan should look to be consistent with the decision of the inspector, and allocate the Winnington Limebeds for renewable energy development.

Lostock Works

- 1.3.9 The Lostock Works Site is located to the east of the A530 and to the south of the Northwich / Knutsford railway line. It comprises a large complex of industrial plant, waste management facilities and energy-related development.
- 1.3.10 The Lostock Works Site is currently safeguarded under Policy ENV 8 of the Local Plan (Part One) for waste management development and Policy DM 54 of the Local Plan (Part Two) requires proposals for new large waste management facilities to be located on sites safeguarded for such development and makes reference to the Lostock Works Site.
- 1.3.11 We support the existing allocations at the site and expect the new Local Plan to replicate these. It is important that the new Local Plan allocates the site for industrial, commercial and ancillary development, provided this does not compromise its current or future role in meeting Cheshire West and Chester's waste management needs. Such an approach would ensure that underutilised previously developed land is put to the most effective use while safeguarding the site's strategic waste management allocation.

Lostock Limebeds

- 1.3.12 The Lostock Limebeds comprises circa 49 hectares of limebeds, located to the east of the A530 and to the west of Cookes Lane. The site is a permitted facility that until recently was used for the storage and separation of lime waste material from the



manufacturing of soda ash at the adjacent Lostock Works Site. Whilst the site is still dredged, it is not currently in active use.

- 1.3.13 The site is subject to a Conservation Covenant which aims to deliver lasting conservation benefits. In partnership with Green Earth Developments Group, TCEL are developing the Lostock Limebeds as a regionally significant Habitat Bank that developers could utilise to achieve off-site biodiversity net gains.
- 1.3.14 The site is not currently allocated in the Local Development Plan. Although it is not the role of the Council to establish and promote sites for off-site biodiversity gains, TCEL believe that the unique circumstances at the Lostock Limebeds should be recognised in the new Local Plan, through supporting the Conservation Covenant and safeguarding the land for biodiversity enhancement and conservation.



2.0 ISSUES AND OPTIONS

2.1 Introduction

2.1.1 The following section responds to the relevant questions within the I&O. The responses have been grouped according to the categories in which they are presented within the I&O.

2.1.2 Not all of the questions set out within the I&O are considered relevant to this representation. As such, where a question has not been included in the response below, it should be assumed that the question is not relevant to this representation.

2.2 Introductory Questions

Question 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?

2.2.1 TCEL do not disagree with the evidence referenced at Paragraph 1.19 of the I&O; however, it is considered that further evidence will be necessary prior to Regulation 19 and adoption. This should include a Landscape Character Assessment and a review of both existing and potential Conservation Areas within the plan area. This will help provide an appropriate baseline for assessment, demonstrate the Council's justifications in terms of designations and allocations, and ensure consistency of approach in decision making.

2.2.2 In addition, Paragraph 165(b) of the National Planning Policy Framework 2024 (NPPF) highlights that plans should identify suitable areas for renewable and low-carbon energy sources. Accordingly, it is recommended that the evidence base for the new Local Plan also includes an assessment of potential sites for renewable energy development to ensure that opportunities to support the transition to net zero are fully considered.

Question IN 2

Do you have any comments on what the monitoring framework should include?

2.2.3 The purpose of the plan monitoring is to ensure that a plan remains relevant, consistent and compliant throughout its life. Consequently, the framework will need to set out how monitoring would be undertaken, by whom and over what period. The



monitoring framework will need to set out the criteria used for measuring compliance, and the points at which a partial or full review of the plan is required. Question 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.

2.2.4 Neighbourhood Plans play an important role in shaping local development, particularly in rural areas, by reflecting the specific needs, character, and priorities of local communities. TCEL support the preparation and use of Neighbourhood Plans in principle; however, it is essential that they do not undermine or contradict the strategic policies, site allocations, and overarching objectives set out in the new Local Plan.

2.2.5 Neighbourhood Plans should complement the Local Plan by providing detailed guidance on local design, housing mix, and community infrastructure, while ensuring that the CWAC's overall development needs and spatial strategy are fully met.

2.3 Vision

Question VI 1

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

2.3.1 TCEL do not disagree with the overarching principles of the Council's vision; however, they could be amended to provide a clearer and more comprehensive direction for the new Local Plan. As currently drafted, the principle on 'Tackling Climate Change' primarily addresses adaptation and mitigation of the effects of climate change. This element should be reworded to also support the reduction of greenhouse gas emissions and the promotion of renewable energy development as part of climate change mitigation.

2.3.2 None of the overarching principles under Policy VI 1 specifically reference strengthening the local economy. It is considered that the principle on 'Providing Infrastructure' should explicitly include infrastructure that supports existing and new employment opportunities, helping to ensure that Cheshire West and Chester remains a prosperous and attractive place to live and work.



- 2.3.3 It is also suggested that the principle on 'Protecting Character' be amended to reference the protection of the special character of towns in addition to villages, ensuring that the distinctive identity of urban as well as rural areas is safeguarded.

Question VI 2

Should the vision include/establish a set out principles and priorities? Are these the right ones – do you have any suggestions?

- 2.3.4 There is currently no reference to specific priorities under Policy VI 1, and as such, no detailed comment or suggestions can be provided regarding priorities at this stage.
- 2.3.5 The vision should collectively address the three pillars of sustainable development (economic; social; environmental). As noted above, the current vision does not make reference to strengthening the local economy, and therefore, it does not fully reflect the economic pillar of sustainable development.

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?

- 2.3.6 The approach of establishing concise visions for each place is considered appropriate.
- 2.3.7 Any vision for Northwich should present the town as a location that transforms its industrial legacy into mixed-use residential developments, renewable energy infrastructure, and biodiversity enhancements, while maintaining its strategic role in waste management. The vision should also ensure that previously developed and underutilised land is repurposed effectively, achieving a balance between economic, social, and environmental objectives.



2.4 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*

2.4.1 TCEL consider Option A to be the most appropriate approach for the new Local Plan. The objectives under Option A provides a clear framework to deliver the purpose of the plan and can be examined and influenced at a local level. Option A better addresses the three pillars of sustainable development (when compared to Option B), as it explicitly considers economic, social, and environmental outcomes. Option A ensures that the new Local Plan can support local economic growth and the provision of jobs more effectively than Option B.

2.4.2 In addition, it would be more challenging to effectively assess or 'test' development proposals against the objectives set out in the Sustainability Appraisal, as these are not as directly applicable to local planning decisions than the objectives set out under Option A.

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?

2.4.3 As set out above, Option A is considered an appropriate approach for the new Local Plan.



Question OB 4

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

- 2.4.4 TCEL support the inclusion of Northwich within Objective SO1 and the reference to previously developed land in Objective SO9, and do not consider that these objectives require amendment. Objective SO3 is not relevant to this representation.
- 2.4.5 Objective SO10 should be amended to take account of the introduction of grey belt land within the NPPF, ensuring that the objective reflects current national policy and its implications for land release and development.

2.5 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?

- 2.5.1 TCEL are generally supportive of the suggested policy approach set out in Policy SD 1. However, the policy could be strengthened to more closely reflect national policy regarding energy infrastructure and emissions targets.
- 2.5.2 Part 1 should be amended to explicitly reference the use of carbon capture technologies and the aim of achieving net zero emissions.
- 2.5.3 Part 2 should be updated to include the generation of energy from renewable and low-carbon sources, ensuring that new developments actively contribute to the transition to a low-carbon economy while supporting the wider national and local energy strategy.

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?

- 2.5.4 The implementation of district heat networks at existing strategic sites would require significant changes to existing infrastructure, including retrofitting buildings, connecting energy supply and demand points, as well as integrating with local heat



users. These challenges mean that delivering district heat networks at many existing strategic sites could be technically complex, costly, and potentially unviable within current development timelines. Additionally, the feasibility of connecting multiple heat sources and users depends on site-specific constraints, including the layout of buildings, proximity of heat demand, and availability of land for energy infrastructure.

- 2.5.5 TCEL therefore believe that any policy regarding district heat networks should not make their implementation mandatory at strategic sites. However, policies could require that strategic sites actively consider the potential for district heat networks and incorporate necessary infrastructure to enable future connections where feasible. This approach would encourage sustainable heating solutions while ensuring flexibility and avoiding unnecessary constraints on the delivery and operation of strategic sites.

Question SD 3

Are there any other sustainable development issues or requirements that should be included in the new Local Plan?

- 2.5.6 As noted above, the new Local Plan should more explicitly recognise the benefits of capturing and reusing greenhouse gas emissions by including this within Policy SD 1, alongside its coverage in Policy EN 5.
- 2.5.7 Similarly, the new Local Plan should emphasise the role of sustainable development in achieving a net zero built environment. While net zero goals are referenced in relation to the transport network and residential and commercial development, the new Local Plan currently does not address net zero ambitions for industrial development or targets for energy generation from renewable sources, nor are these objectives reflected under Policy SD 1. Including such references would ensure a comprehensive approach to sustainability across all sectors.

2.6 Spatial Strategy

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?

- 2.6.1 We have concerns with requiring the delivery of a fixed annual minimum. Although the policy states that the figure is a minimum, in practice annualised targets are often



interpreted as maximums. Once the stated requirement has been achieved in a given year, there is a risk that further applications may be deterred or refused on the basis that the “target” has already been met. Likewise, if delivery in one year exceeds 9.9 hectares, there is a danger that this will reduce requirements in subsequent years, thereby constraining growth.

2.6.2 The policy also assumes that sufficient infrastructure capacity exists to support the annual delivery of 9.9 hectares of employment land. However, in general the successful delivery of employment development is dependent on directing growth to locations where appropriate infrastructure is already in place, or where enhancements can be reasonably secured. By focusing on an annual target delivery, there is a risk that infrastructure will be required to follow development, rather than employment land being directed to locations where it can be supported sustainably from the outset.

2.6.3 In this context, it is considered that the Local Plan would be more effective if it set a strategic requirement for employment land over the plan period, with monitoring undertaken over 5-year periods. This would ensure that sufficient employment land is allocated and safeguarded, while retaining the flexibility to respond to changing economic circumstances and supporting the delivery of sustainable development in the most appropriate locations.

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?

2.6.4 Yes, TCEL agree with the suggested policy approach towards the spatial strategy principles set out in Policy SS 3.

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?

2.6.5 Any policy regarding the settlement hierarchy must be carefully worded to ensure it does not create confusion about how development is directed between settlements. While it is accepted that the scale of growth should be proportionate to the size,



function and demand of each settlement, the policy should not be applied as a sequential test whereby proposals in settlements lower down the hierarchy are resisted unless settlements higher up the hierarchy have first been fully considered. Such an approach would be overly restrictive and inconsistent with the objectives of a positively prepared Local Plan.

- 2.6.6 A sequential interpretation of the hierarchy would also conflict with Policy VI 1, which recognises that different settlements have their own visions. Each settlement also faces distinct needs, constraints and opportunities that may justify different forms of growth irrespective of its position within the hierarchy. The settlement hierarchy should therefore act as a guide to ensure broad proportionality, but it must also allow flexibility such that development can come forward in appropriate locations across the plan area in accordance with local circumstances.

Question SS 9

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

- 2.6.7 Yes. As noted in response to Question OB 4, the introduction of a grey belt policy within the NPPF would provide clear justification for the release of Green Belt land, or for bringing forward proposals on land previously designated as Green Belt but now reclassified as grey belt.
- 2.6.8 The release of Green Belt should be done so strategically to ensure that opportunities to redevelop previously developed land are first explored before development on greenfield land is proposed and/or encouraged.



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*

2.6.9 Option C (sustainable transport corridors) is considered the most favourable of the three, however a balanced approach drawing on all three elements may be beneficial for Cheshire West and Chester.

2.6.10 The retention of parts of the Green Belt remains important in preventing the merging of settlements and limiting unrestricted urban sprawl. However, a strategy focused solely on retaining the Green Belt would be overly restrictive and risks constraining necessary growth. Similarly, continuing with the current Local Plan's level and distribution of development would not sufficiently account for population growth, evolving economic drivers, or the reduced availability of previously developed land compared with the circumstances under which the existing strategy was determined. Finally, while a strategy based on sustainable transport corridors is inherently positive, there could be an over-reliance on existing transport infrastructure which would risk underserving settlements and communities located away from these corridors. Furthermore, the policy approach does risk scenarios in which ribbon development is favoured along arterial routes, which can negatively impact on many of the rural assets that Cheshire benefits from. Consequently, any such approach would need to be supported by clear and defensible policy constraint.

2.6.11 Accordingly, a hybrid approach is probably preferable ((one that safeguards the most sensitive areas of the Green Belt, allows for a rebalanced distribution of growth in response to changing needs, and ensures development is focused in areas with sustainable transport connections without excluding locations can be made suitable through investment in new or improved infrastructure and services).



Question SS 19

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

- 2.6.12 While Option C offers a broadly positive approach by focusing growth in and adjacent to sustainable transport corridors, there are concerns that if the strategy is applied too rigidly it would overlook the important role of strategic brownfield and employment sites that fall outside the immediate influence of existing sustainable transport corridors.
- 2.6.13 For example, the redevelopment potential at the Winnington Works Site is significant and should be positively supported in the new Local Plan, regardless of whether it is located directly within a transport corridor. Similarly, planning permission for the development of a solar park and battery energy storage facility has recently been secured at the Winnington Limebeds, an opportunity that would not have arisen from a corridor-based strategy but is nonetheless essential to meeting local and national climate objectives.
- 2.6.14 The Lostock Works Site is safeguarded for waste management development and has capacity for industrial and commercial uses that would make more effective use of underutilised brownfield land. However, these opportunities are primarily linked to the site's established industrial function, existing infrastructure, and strategic role, rather than its direct relationship with transport corridors. A spatial strategy that prioritises corridors without sufficient flexibility could therefore risk constraining or delaying development in locations that are otherwise well suited for growth and are critical to meeting borough-wide needs.
- 2.6.15 Accordingly, while the principles underpinning Option C are supported, the strategy should be amended to ensure that major brownfield, industrial, and energy-related sites are explicitly recognised as priority development locations, regardless of their relationship to transport corridors. This would deliver a more balanced approach that captures the benefits of sustainable transport connectivity while also securing enhancements to the transport network in areas that are not located in or adjacent to existing transport corridors, as well as the regeneration of strategic sites that are fundamental to the Council's housing, employment, and climate change objectives.



Question SS 20

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

- 2.6.16 TCEL consider that the list of showstoppers should be expanded to include ecological conservation sites. While the current reference to designated habitat sites is noted, there is concern that this does not provide sufficient protection for conservation sites that fall outside formal local, regional, or national designations. Such sites can play an equally important role in safeguarding and enhancing priority habitats and biodiversity, as well as contributing to climate change mitigation.
- 2.6.17 Separately, Paragraph 5.12 of the I&O states: *'We have excluded areas of land that are subject to constraints that would act as potential 'showstoppers' to restrict future development, including...'*
- 2.6.18 TCEL question the use of the word 'including' in Paragraph 5.12, as this implies that there may be additional 'showstoppers' beyond those expressly identified. For clarity and certainty, the new Local Plan should set out a definitive list of 'showstoppers' where land will be excluded from potential growth areas. An open-ended list risks discouraging investment and could undermine confidence in the Local Plan, as developers and landowners would be unable to reliably assess whether sites are suitable for development from the outset.

Question SS 30

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

- 2.6.19 TCEL support the principle of identifying growth areas and acknowledge that some encroachment into the Green Belt will be necessary to facilitate continued growth. However, the new Local Plan should clearly articulate a hierarchical approach whereby development is prioritised within existing settlement boundaries, with a strong emphasis on the redevelopment of brownfield land before considering sites on the periphery of settlements.
- 2.6.20 In addition, TCEL believe that growth areas should not be limited to residential and employment uses but should also include provision for industrial development, including built waste facilities (as opposed to landfill), and renewable energy projects such as those proposed at the Winnington Limebeds. Any policy framework for



growth areas could also take a more strategic approach by identifying locations suitable for circular economy development.

- 2.6.21 For Northwich specifically, TCEL recommend that the Lostock Works site is recognised as a strategic location for circular economy initiatives, given its existing industrial role and capacity to accommodate complementary uses without undermining its safeguarded waste management function.
- 2.6.22 By broadening the scope of growth areas to include industrial and renewable energy development, and by prioritising the reuse of previously developed land, the new Local Plan can support sustainable economic growth, accelerate the transition to a low-carbon economy, and ensure that Northwich plays a leading role in delivering climate resilience and green infrastructure for Cheshire West and Chester.

Question SS 31

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

- 2.6.23 The town of Northwich has developed since Roman times, albeit it grew significantly in the 16th Century due to the development of salt beds and associated industries. It was not until the 19th Century that large scale industrial development changed Northwich into the town of today, and which TCEL is built upon. This mix of semi-rural / market town / heavy industrial uses has created a special and unique blend of land uses. The road network has had to develop over time, albeit constrained by the River Weaver which meanders through it, and the system bridges that cross it. The road system is regularly cited as a constraint to development, however in reality the bottle-necks control development growth and private vehicle use, and should not be seen as an insurmountable constraint by the planning system to ongoing development. The town is now significant in scale and economic importance (service, sales and manufacturing sectors), and it is important that new houses are built, industry is supported, and growth continues. A road network built on a historical small town does not mean that the planning system should resist modern development. The ability to massively re-design the road network is limited both as a result of cost, and physical land availability. Therefore, a programme of manageable, piecemeal maintenance and improvement is needed across the Northwich network. Continued use of road modelling and improved wider links should offset any concern that the road network is at capacity.



2.7 Northwich

Question NO 1

Do you agree with the suggested policy approach towards Northwich, as set out in NO 1 'Northwich' above? If not please suggest how it could be amended?

- 2.7.1 Yes, TCEL strongly support the retention of allocations set out in the current Local Plan, particularly at Winnington Works, where mixed-use residential development remains a key priority given that delivery has not progressed at the anticipated rate. However, the allocation at the Winnington Works Site should be amended such that the site is designated as a major housing-led mixed-use allocation in future iterations of the new Local Plan, replacing its current designation in the existing Local Plan as a 'regeneration area'.
- 2.7.2 When considering the vision principles set out under Policy VI 1, it is essential that the policy explicitly references the delivery of infrastructure that will enable progress towards net zero. The new Local Plan should therefore identify existing and emerging sites that can facilitate this transition. This includes the Lostock Works Site, which has the potential to accommodate net zero industrial development, and the Winnington Limebeds, which has recently secured planning permission for renewable energy generation and battery energy storage infrastructure but has not yet been implemented.

Question NO 4

Are there any infrastructure requirements required to support the suggested policy approach set out above?

- 2.7.3 Ongoing improvements to the existing transport network will be required to support continued growth in Northwich, as current traffic systems are operating close to capacity and potentially stifling new development opportunities.
- 2.7.4 As highlighted under Question NO 1, the policy should explicitly commit to tackling climate change. Embedding this within the policy framework would necessitate the provision of infrastructure to support renewable energy generation, facilitate net zero development, and enable the growth of the circular economy. Such infrastructure is essential to ensure that Northwich can accommodate future development sustainably while contributing to wider climate objectives.



Question NO 5

Should the settlements that make up the wider Northwich urban area be retained?

- 2.7.5 Yes, the settlements that make up the wider Northwich urban area should be retained as many contain strategic sites that make a substantial contribution to both the objectives of Northwich and the wider Cheshire West and Chester region.
- 2.7.6 Retaining these settlements ensures that strategic assets can continue to contribute to economic growth, housing delivery, climate change mitigation, and biodiversity enhancement. Their inclusion within the settlement structure is essential for the comprehensive and sustainable development of Northwich and its surrounding area.
- 2.8 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?

- 2.8.1 TCEL are generally supportive of the suggested policy approach towards economic growth, employment, and enterprise as set out in EG 1. The emphasis on supporting existing businesses, attracting inward investment, and ensuring a flexible supply of employment land is welcomed. However, TCEL consider that the policy should go further by explicitly linking economic growth to the national net zero ambitions and climate change mitigation objectives. Future economic development should not only generate employment opportunities but also prioritise decarbonising industries, renewable energy infrastructure, and the circular economy.
- 2.8.2 In this context, strategic sites such as Lostock Works and Winnington Works play an essential role in meeting these ambitions. The Lostock Works Site already supports waste management and energy-related infrastructure and has the capacity to accommodate further industrial development aligned with low-carbon technologies and circular economy principles. Similarly, Winnington Works offers an opportunity for mixed-use development that integrates sustainable employment provision alongside residential uses.



- 2.8.3 TCEL therefore suggest that the policy should include a specific commitment to:
- i) Encourage economic growth sectors that directly contribute to net zero targets, including renewable energy, energy storage, and circular economy industries.
 - ii) Identify and safeguard strategic sites, such as Lostock Works, for these purposes.
 - iii) Facilitate investment in infrastructure necessary to support low-carbon industries, ensuring these sites remain viable and attractive for green economic development.
- 2.8.4 By embedding these objectives, the Local Plan will ensure that economic growth is sustainable and aligned with both local and national climate change commitments.

2.9 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?

- 2.9.1 TCEL are generally supportive of the suggested policy approach towards green infrastructure, biodiversity, and geodiversity as set out in GI 1, particularly the continued emphasis on safeguarding and enhancing biodiversity.
- 2.9.2 However, TCEL believe that the policy and its supporting evidence should explicitly recognise the importance of certain sites that contribute significantly to biodiversity and ecological recovery. The Lostock Limebeds should be included as part of the Local Nature Recovery Strategy (LNRS) Opportunity Areas or as a designated area for nature recovery. This site not only provides an established habitat for priority species and supports biodiversity enhancement, but also offers potential for ecological connectivity within the wider landscape.
- 2.9.3 Including Lostock Limebeds within the LNRS will ensure that development proposals in and around Northwich acknowledge its strategic value for nature recovery and biodiversity net gain. Furthermore, the inclusion of this site aligns with the Council's climate change objectives by safeguarding natural assets that help with carbon sequestration and ecological resilience.



2.9.4 TCEL therefore recommend that:

- i) The LNRS mapping and policy wording should incorporate Lostock Limebeds as an ecological opportunity site.
- ii) The policy should commit to identifying and safeguarding additional locally significant sites that, while not statutorily designated, play a critical role in supporting biodiversity, mitigating climate change, and delivering environmental net gain.

2.9.5 By doing so, the new Local Plan will deliver a more robust and spatially comprehensive approach to biodiversity and nature recovery.

2.10 Energy

Question EN 1

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

2.10.1 TCEL are broadly supportive of the suggested policy approach towards energy, as set out in EN 1, particularly the emphasis on locating energy-related developments on previously developed land and within industrial areas wherever possible. This aligns with national and local objectives to prioritise brownfield redevelopment and reduce pressure on greenfield and agricultural land.

2.10.2 However, TCEL believe that the policy could be strengthened to better align with net zero targets and the growing need for renewable and low-carbon energy infrastructure. The policy should make explicit reference to the potential role of strategic brownfield and industrial sites, such as the Lostock Works Site, in supporting low-carbon and renewable energy generation and net zero infrastructure. The site is uniquely positioned to accommodate energy-related development with minimal environmental impact, due to the industrial character and existing infrastructure.

2.10.3 Similarly, Policy EN 1 should explicitly support low-carbon and renewable energy developments and give priority to schemes that facilitate the transition to net zero ahead of more carbon-intensive alternatives.



2.10.4 The policy should also ensure flexibility to accommodate emerging energy technologies and storage solutions that support the transition to net zero. Specific reference could be made to battery energy storage systems which are critical for balancing supply and demand in a renewable-based energy system.

Question EN 4

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

2.10.5 TCEL welcome the criteria set out in Policy EN 3 and note that the inclusion of the relevant EN 1 criterion is particularly positive, ensuring that solar developments are appropriately assessed for landscape, environmental, and biodiversity impacts.

2.10.6 However, TCEL consider that the policy should include greater flexibility regarding sites currently classified as “highly sensitive”. In practice, such classifications may not accurately reflect a site’s actual capacity to accommodate solar development without causing significant environmental harm. This was successfully demonstrated at the Winnington Limebeds, where the planning application established that the solar park and battery energy storage facility could be delivered without unacceptable environmental impacts.

2.10.7 TCEL therefore suggest that Policy EN 3 includes wording to allow development proposals on sites identified as highly sensitive, provided that it can be robustly demonstrated that:

- i) The site is not sensitive to the scale and nature of the proposed solar development; or
- ii) The proposal would not result in significant adverse environmental, landscape, or visual impacts.

2.10.8 Incorporating this flexibility would ensure that the policy does not unnecessarily preclude renewable energy developments on potentially suitable sites and would support the Council’s wider objectives for low-carbon and renewable energy generation and net zero targets.



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?

- 2.10.9 TCEL generally supports the suggested policy approach set out in EN 4, particularly the emphasis on zero-carbon and net-negative energy solutions. These measures align with the wider objectives of achieving net zero and reducing reliance on fossil fuels.
- 2.10.10 However, the policy could be strengthened by explicitly encouraging the use of previously developed land for renewable energy and heat projects, as well as prioritising locations where excess heat or energy can be efficiently utilised to support nearby industrial processes. This would help maximise the efficiency of energy generation and distribution, while also reducing the carbon footprint of new developments.
- 2.10.11 Policy EN 4, and all other policies relating to energy, should also include wording that supports energy-related development where it can be demonstrated that the benefits of the scheme outweigh any potential harm.

Question EN 6

Do you agree with the suggested policy approach towards energy, as set out in EN 5 'Low carbon fuel and carbon capture' above? If not please suggest how it could be amended?

- 2.10.12 TCEL generally support the suggested policy approach set out in EN 5, which prioritises low-carbon fuels and carbon capture technologies. The policy's emphasis on green and blue hydrogen, the appropriate use of waste-derived fuels, and the promotion of carbon capture and utilisation aligns with the net zero objectives and the need to decarbonise energy systems across Cheshire West and Chester.
- 2.10.13 However, TCEL believe that Policy EN 5 should explicitly recognise the potential of established industrial sites, such as Lostock Works and Winnington Works, to accommodate low-carbon fuel production and carbon capture facilities. These sites already have the necessary industrial infrastructure and connections to existing energy and waste networks, making them suitable locations for low-carbon fuel and carbon capture projects.



2.10.14 Policy EN 5 should also include wording that allows flexibility for emerging low-carbon fuels and carbon capture technologies, ensuring that developments which contribute to reducing emissions but do not fall strictly into current definitions are not inadvertently excluded.

2.11 Managing Waste

Question MW 1

Do you agree with the suggested policy approach towards managing waste, as set out in MW 1 'Managing waste' above? If not please suggest how it could be amended?

2.11.1 TCEL are broadly supportive of the policy approach set out in Policy MW 1 regarding the management and safeguarding of waste facilities. However, TCEL consider that the policy could be strengthened in key areas.

2.11.2 The policy should explicitly recognise the Lostock Works Site as a strategic site for regional waste management and energy recovery. Safeguarding the site is critical, not only for current waste management capacity but also to enable future low-carbon energy and circular economy developments. Similarly, sites such as the Winnington Works Site should be acknowledged for their potential to integrate waste management and energy-related infrastructure. In addition, the policy could also link waste management to net zero and low-carbon energy objectives.

2.11.3 It is also considered that Policy MW 1 could be improved by explicitly promoting circular economy developments that co-locate waste, energy, and industrial processes to maximise resource efficiency, reduce transport impacts, and create low-carbon industrial clusters.



Question MW 2

The Waste Needs Assessment (2023) identifies that there is sufficient waste management capacity in existing sites and sites with planning permission to meet the projected management requirements up to 2045 (apart from landfill). However, we are not proposing to limit waste management development or prevent future developments due to a lack of 'need', as there will be waste flows between authority areas. Any new proposals for waste developments would be assessed on their own merits and against the criteria identified above. Do you agree with this approach? Please provide reasons for your answer.

- 2.11.4 TCEL agree with this approach. Historically overprovision within local plan could result in increased waste management towards the bottom of the hierarchy (landfill) and demotivation towards driving waste up the hierarchy. With the advent of fiscal constraint (principally the landfill tax escalator) market forces have driven the delivery of waste management solutions up the hierarchy. Under provision risks not having the facilities we require to meet the need within the authority area, and adjoining areas (further up the hierarchy). Over provision of recycling and recovery facilities doesn't happen because investors/developers simply will not build facilities where there is a shortage of waste to serve them. Consequently, it is much better from a plan perspective to over provide than under provide.

