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

Dig Lane, Frodsham

Barratt David Wilson Homes North West

August 2025

Turley

Contents

1. Introduction

1.1 This representation to the Cheshire West and Chester ('CWAC') Regulation 18 Local Plan Issues and Options ('I&O') Consultation is submitted by Turley on behalf of Barratt David Wilson North West ('BDW'). These representations relate specifically to BDW's land interests at Dig Lane, Frodsham (the 'Site') and should be read in conjunction with the detailed representations prepared by Pegasus Group , which relate to BDW and Redrow's wider land interests across CWAC, and Lichfield's Research Paper on CWAC's Objectively Assessed Housing Need (**Appendix 1**)

1.2 A Site Location Plan which identifies the land at Dig Lane is enclosed at **Appendix 2.**

1.3 In addition to the I&O Consultation Document, CWAC Council are also consulting on a Sustainability Appraisal, incorporating a Strategic Environmental Assessment ('SEA') Equalities Impact Assessment, Health Impact Assessment, and Rural Proofing, as well as a Habitat Regulations Assessment. The evidence base includes a Background Data Document, containing information on population, housing, employment, and settlement surveys.

The Applicant

1.4 BDW is part of the Barratt Redrow Group, the UK's leading housebuilder in the FTSE 100, delivering high-quality, energy-efficient homes and sustainable communities across Britain.

1.5 680,000 homes have been built by BDW since 1958 and they have earned a 5-star housebuilder award from the Home Builders Federation for 15 consecutive years, demonstrating their commitment to quality and customer service.

1.6 As part of BDW's commitment to local economies, they create an average of 2.5 jobs per home, work with local contractors and suppliers, and 90% of our materials are manufactured in the UK. £1 billion area also invested annually in affordable housing and community initiatives, reinforcing their dedication to delivering not just homes, but thriving communities.

1.7 BDW have an extensive track record of delivering high quality, well landscaped residential development across CWAC Council over the last 20 years. Their developments have been spread across the borough, in locations such as Tarporley, Winnington Urban Village, Mickle Trafford, Neston and Winsford, providing hundreds of beautiful new homes, with associated infrastructure improvements. BDW have proudly shaped communities across the borough.

Planning Background

1.8 BDW submitted a comprehensive planning application for the residential development of the Site on 9th July 2025 (LPA ref. 25/02109/FUL). The description of development is:

"Residential development for 91 dwellings including access from A56 Chester Road, public open space, landscaping, sustainable urban drainage, car and cycle parking and associated works." ('The Proposed Development')

1.9 A Planning Layout Plan, which demonstrates how the Proposed Development will be accommodated at the Site, is enclosed at **Appendix 3.**

1.10 At the time of writing, the application is pending determination. The statutory determination deadline is 8th October 2025. The application was accompanied by an Environmental Impact Assessment Screening Request (LPA ref. 25/02187/SCR). No screening opinion has been provided by CWAC at the time of writing.

1.11 The application has been prepared in response to the ongoing housing crisis and emerging housing needs in CWAC Council, and the need to provide high-quality housing in sustainable locations in response. The application is supported by a Green and Grey Belt Appraisal (**Appendix 4**), which demonstrates that the Site meets the definition of 'grey belt' land, as set out at Annex 2 of the NPPF, and meets the required tests including the 'Golden Rules'. As such, the development of the Site is not inappropriate development in the Green Belt.

1.12 The technical assessments which support the application demonstrate that the Site represents a sustainable location adjacent to Frodsham with development underpinned by a high-quality approach to design, layout, and landscape which respects and responds to the Site constraints and its wider environment.

Overview of Representations

1.13 BDW has made representations to previous rounds of consultation on the emerging CWAC Local Plan, including the Local Plan Conversation 2021 and associated Call for Sites exercise in September 2021.

1.14 The preparation and adoption of a new Local Plan for CWAC is critical to being able to deliver local housing and employment needs in a planned and sustainable manner, particularly in light of recent national planning reform and the current absence of a five-year housing land supply ("5YHLS").

1.15 Since its election in July 2024, the Government has made clear that the *"sustained economic growth is the only route to improving the prosperity of our country and the living standards of working people"*[1]. It has stated that its *"central mission"* is to *"restore economic growth"* and it also aims to deliver the infrastructure that the country needs, *"including one and a half million homes over the next five years"*[2]. The Treasury has confirmed that: *"The government's housing targets, coupled with investment in supporting infrastructure, will remove barriers to economic growth."*[3].

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1 Proposed reforms to the National Planning Policy Framework and other changes to the planning system (MHCLG, August 2024)

2 Speeches by the Chancellor, The Rt Hon Rachel Reeves MP, on 5/8 July 2024

1.16 The revisions to the National Planning Policy Framework ('NPPF') in December 2024 provide a policy framework to facilitate the Government's commitments to economic growth and to tackle the housing crisis. Alongside publication of the revised NPPF in December 2024, a revised standard methodology for calculating Local Housing Need ('LHN') was introduced to help ensure that the Government's target of delivering 300,000 new homes per year can be achieved. The NPPF now makes clear that Local Plans should accommodate the minimum number of homes needed, as dictated by the LHN when using the standards methodology.

1.17 These site-specific representations demonstrate why the proposed Site at Dig Lane is a suitable and deliverable option for a residential allocation in the new Local Plan. They also comment on the proposed policy approaches relevant to the Site at Dig Lane, and the associated live planning application. BDW hopes that these representations will assist the Council and be fully considered as part of the preparation of the next stage of the CWAC Local Plan. BDW would welcome the opportunity to engage further with the Council regarding the Site and the matters raised in these representations.

1.18 The structure of these representations is outlined below:

- **Section 2 'The Site'** – provides a detailed description of the Site and its surroundings confirming its highly sustainable location and proximity to a range of services and facilities; and confirms the suitability, availability and achievability of the Site, demonstrating why the Site provides a sustainable and deliverable allocation / development option (as already recognised by the Council).

- **Section 3 'Response to Issues and Options**' – provides responses to the questions posed through the Issues and Options consultation document focussing on those of most relevance to the Site and development opportunity it presents.

- **Section 4 'Summary and Conclusion' –** this section provides a brief summary of the representations and concludes why the Site should be released from the Green Belt and allocated for residential development within the new Local Plan.

1.19 The representations are supported by a number of plans and documents previously submitted as part of the planning application, and enclosed again here for reference. These include:

- Appendix 1: Research Paper – Cheshire West and Chester's Objectively Assessed Housing Need, prepared by Lichfields (August 2025)

- Appendix 2: Location Plan (ref. DWH072-LP01-A)

- Appendix 3: Planning Layout Plan (ref. DWH072-PL01-F)

- Appendix 4: Green and Grey Belt Appraisal, prepared by Turley (June 2025)

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10 Year Infrastructure Strategy Working Paper – A Cross-Government Plan for Infrastructure, page 1 (HM Treasury, January 2025)

2. The Site

Site Description

2.1 The Site is located in Frodsham – which is situated along the northern boundary of the CWAC administrative boundary. Frodsham is located in between Runcorn to the north (in the borough of Halton) and Helsby to the south (**Figure 2.1**).

Figure 2.1: Aerial Site Context Plan

Aerial Image of Strategic Location of Site (red edge) (CWACC boundary in blue) (Source: Google Earth).

2.2 The Site lies approximately 800m to the south west of Frodsham Town Centre and borders the settlement edge of Frodsham, separated by the railway line and the A56 Chester Road.

2.3 The Site extends to 4.65 hectares and largely comprises a single field of arable land, with a smaller area of loosely managed grassland, wetland and scrub. Mature trees are also present at the junction of Dig Lane and Chester Road. There are no buildings or structures within the Site.

2.4 The Site is contained to the north by the railway line, which is raised on a vegetated embankment; and mature hedge planting and the A56 Chester Road to the east. The western boundary of the Site is delineated by existing hedgerows and vegetation and also residential properties.

2.5 Access to the Site is provided via an existing gated pedestrian access point and adjoining gated agricultural access point from Dig Lane at the south-east corner of the Site.

2.6 The topography of the Site slopes notably down from c.27.5m AOD at the south-east corner to c.12m AOD at the northeast corner. The fall in levels is particularly experienced along the eastern boundary with the A56 Chester Road. The Site slopes gently down from east to west up to the central portion where it becomes more level, slightly undulating arable field. Beyond the site to the north and west, the topography is relatively flat.

2.7 The Site is located in Flood Zone 1, i.e. at lowest risk of fluvial flooding. Some areas of the Site, predominantly adjacent to the railway line, are identified as having low to high chance of surface water flooding. The Proposed Development demonstrates how areas of surface water flooding can be avoided in the design of the scheme.

2.8 There are no designated heritage assets within the Site. Rock Cottage and Rock Farm (Grade II Listed Building) is at the immediate southern end of the Site. Milk Bank Cottage (Grade II Listed Building) and Millbank Farm (Grade II Listed Building) are at the immediate north-eastern point of the Site. The Castle Park Grade II Registered Park and Garden, and Frodsham (Town) Conservation Area are at the immediate east and immediate north-east of the Site respectively.

2.9 The Site itself is not subject to any statutory environmental designations. There are, however, a number of statutory designations within proximity of the Site. The Site is situated nearby to a number of Sites of Special Scientific Interest (SSSI): Dunsdale Hollow SSSI, located c. 800m to the south; and two areas of Frodsham Railway and Road Cuttings SSSI, located c. 515m to the east, and c. 760m to the north east, respectively.

2.10 There are no Tree Preservation Orders which effect the Site.

Site Surroundings

2.11 The Site lies to the west of the established settlement of Frodsham. Frodsham Town Centre, which can be accessed within a c.10-minute walk, provides a wide range of facilities and services, including schools, post office, community centre, library, convenience stores. This is as confirmed within the Places Background Paper[4] which accompanies the Local Plan consultation. Castle Park (with athletics track and tennis court) is a short walking distance from the Site.

2.12 The Site benefits from direct access to the A56 Chester Road, providing connections (via the M56) towards Runcorn, Widnes, Chester, Speke and Liverpool.

2.13 Bus services are provided at Netherton Hall (southern end of the Site) and Main Street (north-west of the Site). They offer connections to Chester Bus Interchange, Halton Hospital and Runcorn where a range of amenities and services are available.

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4 Places background paper- Frodsham (amended 2024) (1).pdf

2.14 The closest railway station to the Site is Frodsham which is 1.3km from the Site. This station provides frequent services to Chester, Liverpool, Manchester Airport, Leeds, Llandudno and Holyhead.

2.15 The eastern area of the Site is mostly residential in character. The majority of the dwellings within the locality are two-storeys in height and being detached or semi-detached, with a medium density pattern.

2.16 The surrounding land to the north (beyond the railway line) and west consist predominantly of agricultural land.

2.17 Public Right of Way footpath 'Frodsham FP33' runs along the western boundary of the Site, providing a connection between A56 Chester Road and Hatley Lane. Where footpath 'Frodsham FP33' terminates at Hatley Lane, footpaths 'Frodsham FP53' and 'Frodsham FP34' can be accessed a short distance to the north-west and south-east respectively.

2.18 A short distance to the south of the A56 Chester Road/Dig Lane junction, footpath 'Frodsham FP32' can be accessed via steps in the western verge of the A56 Chester Road, which provides a shortcut route for those travelling between the A56 Chester Road and Howey Lane.

2.19 The Site is therefore in a highly sustainable location, in close proximity to a range of services and facilities.

The Places Background Paper (2024)

2.20 The Places Background Paper 2024, prepared by CWAC Council provides detailed information on the availability of services and facilities in Frodsham, further reinforcing the town's credentials as a sustainable location for development. In summary, the paper confirms that Frodsham benefits from the following:

"Availability of services and facilities

- *Frodsham is identified as a town centre for the purposes of retail policy. There is a good mix of retail and leisure as well as national chains and independent retailers. Residential is often mixed between the commercial uses. There is a popular weekly market in the centre that draws a wider audience than local residents. Frodsham is a large settlement and does have a wide catchment of residents to support the centre. The town centre has a variety of key local services including a supermarket, post office, leisure centre, and medical services. Castle Park Arts Centre is a key asset for Frodsham providing three art galleries, craft units, coffee shop and workshop rooms.*

Social and Community Infrastructure

- *Education – four primary schools*
- *Health – GP practice and medical centre, dentists, care homes and pharmacies*

- *Community, culture and entertainment – community hall, library, places of worship, several pubs and restaurants*

- *Castle Park House and Gardens offers a mixture of formal gardens and lawns and recreational leisure facilities such as a bowling green and tennis courts. The house offers access to Council Services and purpose built conference and office facilities.*

Accessibility / access to public transport

- *Frodsham has excellent transport links to the A56 and M56 to Manchester and Chester and has a railway station which is served by an hourly service from Chester to Manchester via Warrington and between Chester and Liverpool.*

- *There is an hourly bus service to Ellesmere Port and the Countess Hospital/Chester and an hourly service to Warrington via Runcorn and Halton. A service runs once every two hours to Northwich via Cuddington.*

- *Frodsham is at the head of the Sandstone Trail which stretches 34 miles (55km) and offers superb walking opportunities across Cheshire between Frodsham and Whitchurch in rural north Shropshire, to the south. Access can also be gained along the River Weaver and Frodsham Marshes for other walking opportunities."*

Green Belt Context

2.21 The Site is currently located within the Green Belt. However, as set out in the accompanying planning application[5], there is a clear case for releasing the Site from the Green Belt in this location. It has been demonstrated that the Site does not perform a strong Green Belt function, owing largely due to its strong boundaries adjacent to existing development and infrastructure. It represents a logical, modest extension to Frodsham.

2.22 The live planning application demonstrates that the Site comprises grey belt land. In these circumstances, such sites should be prioritised for allocation over other Green Belt locations, to meet identified needs in accordance with paragraph 148 of the NPPF. Should the Council disagree that the Site comprises grey belt land, exceptional circumstances exist to justify the removal of the Site from the Green Belt, consistent with the National Planning Policy Framework (NPPF), given:

- The Council's acknowledged housing land supply shortfall and the need to identify sustainable and deliverable sites.

- The strategic context of the Site as part of growth Options B and C (ref. FRO03) in the emerging Local Plan (discussed in the following section of this report).

[5] Green and Grey Belt Appraisal, prepared by Turley (June 2025) (**Appendix 3**); Planning and Affordable Housing Statement, prepared by Turley (June 2025)

- The Site's ability to deliver housing immediately following the grant of planning permission, as supported by the live planning application.

2.23 Accordingly, the Site is a strong candidate for Green Belt release through the Local Plan process. Indeed, this is recognised by the Council in identifying the Site within the Frodsham growth area (ref. FRO03) under Growth Options B and C.

Suitability, Availability and Achievability

Suitability

2.24 As demonstrated above, the Site represents a logical and sustainable location for growth. It adjoins the existing settlement edge and is well-related to local services and facilities including schools, and public transport connections, providing a natural extension to Frodsham that consolidates the built-form. There are no overriding environmental or technical constraints that would prevent development. Where further technical work is necessary, it is anticipated that any additional constraints identified could be appropriately managed through masterplanning and mitigation.

2.25 Importantly, the Council's own Growth Options B and C have identified the Site within the Frodsham growth area (ref. FRO03) , reflecting the deemed suitability of the Site in contributing to meeting local housing needs. This is discussed further in this report.

Availability

2.26 BDW have an option over the land and are actively promoting the residential development of the Site through the live planning application and the Local Plan process. There are no known legal or ownership constraints.

2.27 The submission of a planning application demonstrates the clear intention and commitment of the landowner and BDW to bring the Site forward for residential development.

Achievability

2.28 The Site is deliverable in the short-term. It is being promoted by a national housebuilder, who have an option over the land, with a proven track record of delivery in and around the local area and nationally.

2.29 The live planning application confirms that a high-quality residential development of market and affordable housing can be delivered within a landscape-led scheme. The Site can make an immediate and meaningful contribution to the Council's housing land supply.

Conclusion

2.30 In accordance with paragraph 159 of the NPPF, and the NPPF glossary definition of a deliverable site, the Site is demonstrable suitable, available and achievable. Its allocation would provide a sustainable and deliverable development opportunity that can support the Council in addressing its housing land supply shortfall, and longer-term growth requirements – as recognised by the Council in identifying it within the Frodsham growth area under Growth Options B and C (ref. FRO03).

3. Response to Issues and Options

Evidence Base

Question IN1 – Do you agree that this is the right evidence that we need to inform the new Local Plan? Is there further evidence that you think will be required?

3.1 The I&O Consultation Document confirms that CWAC Council intend to prepare additional evidence to support the emerging Local Plan, including a Housing Needs Assessment, Green Belt Study, Infrastructure Delivery Plan, Strategic Viability Assessment and Land Availability Assessment.

3.2 The Council must ensure that all proposed policy directions and spatial strategy are thoroughly justified and supported by evidence. The outlined documents, alongside any other necessary studies, will be essential to robustly underpin the policies set out in the emerging Local Plan.

3.3 It is essential that the evidence base that informs the emerging Local Plan reflects the latest national policy as set out in the NPPF and Planning Practice Guidance ("PPG"). In particular, this includes ensuring that the proposed Green Belt Study aligns with the updated Green Belt PPG published in February 2025[6], including consideration of grey belt opportunities.

3.4 In addition to the evidence already identified by CWACC, other evidence that should be produced or updated to ensure it reflects the latest context includes:

- Site Selection Paper – to date there is no evidence provided by CWAC Council on the proposed allocations, including FRO03. As set out in these representations, the live planning application for the Site is supported by a full suite of technical documents. BDW are happy to assist CWACC in sharing relevant evidence, as necessary.
- Places Background Paper 2024, which should be extended to consider all identified Local Service Centres (in addition to the urban areas and Key Service Centres) and the potential for these to be 'moved up' the settlement hierarchy.
- Economic Needs Assessment 2025
- Brownfield Land Register
- Playing Pitch Strategy 2021
- Public Open Space Assessment
- Duty to Cooperate Statement

[6] MHCLG (February 2025) *Green Belt PPG*. Available: Green Belt - GOV.UK

- Updated Conservation Area Appraisals and Management Plans for all Conservation Areas in CWAC

Monitoring

Question IN 2 – Do you have any comments on what the monitoring framework should include?

3.5 The emerging Local Plan should have a clearly defined monitoring framework, which establishes key monitoring indicators for each relevant policy and defines how the objectives / targets established in the Local Plan are being met and, if not, why and what actions will be taken and when to address any issues. It should also confirm the associated data sources and means of reporting.

3.6 Effective monitoring of housing delivery is particularly critical. If annual monitoring reveals delays in housing delivery across CWAC, prompt action must be taken to rectify this. The Council should monitor housing delivery against a published Housing Trajectory and conduct site-by-site housing monitoring at least annually, in accordance with Paragraph 78 of the NPPF.

Plan Period

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

3.7 The I&O Consultation Document confirms that CWAC Council intends to plan for a period of 15 years.

3.8 Paragraph 22 of the NPPF states that strategic policies should look ahead over a minimum 15-year period from adoption and that, where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

3.9 To ensure a robust approach to the emerging Local Plan, reflecting the anticipated preparation timescales and providing the 15-year plan period post-adoption required by paragraph 22 of the NPPF, BDW considers that the Council should, at a minimum, prepare a Local Plan extending to at least 2045. This would secure the necessary 15-year period following adoption. However, it is also noted that the current adopted Local Plan covers a 20-year period. The Council should therefore consider whether the scale of housing and employment needs, along with the strategic sites identified to meet them, warrant extending the emerging Local Plan beyond 15 years. A 20-year plan period may be more appropriate.

Neighbourhood Plans

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.

3.10 In accordance with paragraph 13 of the NPPF, *"neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies".* Footnote 17 of the NPPF confirms that *"neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area".* Similarly, as set out at paragraph 30 of the *NPPF "neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies".* Furthermore, they must meet the 'basic conditions' set out in paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended) (as per paragraph 38 of the NPPF).

3.11 BDW recognises the value of neighbourhood planning in providing communities with an opportunity to shape a vision for their area. However, it is essential that the emerging Local Plan seeks to meet all housing (and employment) needs in CWAC by allocating sufficient land to accommodate these needs and does not rely on any shortfall to be delivered by neighbourhood plans. Frodsham's Neighbourhood Plan ('FNP') in particular was adopted long after the LPP1 (i.e. 9 years after) as such its housing policies and provision are no longer aligned with the NPPF and are considered out of date in this regard.

3.12 BDW therefore disagrees with the Council's assertion at paragraph 1.27 of the Reg 18 Consultation Draft Plan that much of the content of the existing neighbourhood plans across CWAC won't be affected by the emerging Local Plan. Once the emerging Local Plan has been adopted, it will be necessary for the respective neighbourhood forums to review and update their neighbourhood plans to ensure continued consistency with the strategic policies of the Local Plan. Paragraph 30 of the NPPF states that *"Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies".* Neighbourhood plans should not attempt to overtly restrict development where it is necessary to meet local needs and should be informed by an evidence base to support all proposed policies.

3.13 As such, BDW request that paragraph 1.27 is updated to remove reference to existing neighbourhood plans not being affected by the emerging Local Plan. This is a review exercise each neighbourhood forum will have to undertake once the Local Plan is adopted, to ensure alignment with the new Local Plan. To pre-empt this conclusion is unnecessary nor justified.

Vision and Objectives

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

3.14 VI1 of the I&O Consultation Document sets out the vision for CWAC, including the overarching principles of tackling climate change; promoting wellbeing; providing infrastructure; and protecting character.

3.15 BDW generally agrees that the key principles outlined in the proposed vision are necessary and demonstrate a commitment to addressing the key challenges facing CWAC. However, in line with paragraph 15 of the NPPF, Local Plans should set out a

positive vision for the future of the Plan area. BDW considers that the emerging Local Plan should establish an ambitious yet realistic vision for CWAC's future, clearly articulating how the Council envisions the area's growth and development through to the end of the Plan period.

3.16 A key element of this vision must be a clear commitment to meeting the identified current and future housing needs of the Borough, including market housing, family homes, affordable housing, homes for older people, and homes for first-time buyers. Currently, the I&O vision lacks explicit reference to meeting housing needs, which BDW believes should be addressed—particularly given in the context of the ongoing national housing crisis.

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?

3.17 Subject to the inclusion of explicit reference to meeting housing (and employment) needs as above, BDW agrees that the key principles included in the proposed vision (i.e. tackling climate change, promoting wellbeing, providing infrastructure and protecting character) are necessary and show commitment to addressing key challenges facing CWACC.

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?

3.18 The key places identified in the new Local Plan include Chester, Ellesmere Port, Northwich, Winsford, Frodsham, Neston and Parkgate. BDW support the proposed approach to establishing specific visions for key places within the Borough, subject to this aligning with the defined Spatial Strategy and Settlement Hierarchy and being informed by the evidence base.

3.19 BDW are particularly supportive of the Local Plan setting out an individual vision for Frodsham. The I&O Consultation Document recognises Frodsham as a market town, highlighting its important role in providing infrastructure and services to both its relatively large population and the surrounding hinterland. This marks a significant shift from its previous designation in the current Local Plan (Part One) ('LPP1') (January 2015), where Frodsham was classified as a rural area key service centre. Given this notable growth, it is essential that future development in Frodsham is guided by a clear and focused vision. BDW support and welcome this approach to Frodsham and trust this elevated status will ensure a proportionate level of growth is allocated to the town.

Frodsham and Spatial Strategy

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

3.20 As set out in the accompanying Lichfield's Research Paper[7], the new standard method for calculating housing need is one of the central tenets of achieving the Government's objective to deliver 1.5 million homes in the current Parliament.

3.21 The updated standard method results confirm that CWAC's housing need figure is 1,928 dwellings per annum ('dpa'), which is considerably higher than the previous standard method demographic-based figure of 489dpa, and also much higher than the 2015 Local Plan figure of 1,100dpa. Applying the updated standard method equates to a total requirement of 28,920 dwellings over a 15-year plan period and 38,560 dwellings over a 20-year plan period. In accordance with the NPPF, the standard methodology for assessing local housing need in England and the July 2024 Written Ministerial Statement – *"Building the Homes we need"* – this is the *minimum* housing need figure that should be considered in preparing the emerging Local Plan. Furthermore, in line with paragraph 69 of the NPPF, the Council may also need to consider if it is appropriate to plan for a higher housing need figure than the standard method indicates to reflect growth ambitions linked to economic development or infrastructure investment.

3.22 To assist the Council in ensuring that the emerging Local Plan meets all of CWAC's housing needs, including in terms of the types and tenures of housing required across the Borough and maintaining an appropriate balance of development, BDW consider that it will be essential for appropriate evidence to be gathered. This should take the form of a local housing needs assessment (including affordable housing) and a viability assessment to determine what types of homes may be needed and can be delivered in CWAC. These documents should be made available for future consultation. Any affordable housing requirements should be clearly defined and evidenced, with flexibility provided within relevant policies where viability challenges exist.

3.23 The emerging Local Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver CWAC's housing requirement, including the maintenance of a 5-year housing land supply. This will also enable the Housing Delivery Test to be achieved. BDW strongly recommends that the plan allocates more sites than necessary to meet the *minimum* housing requirement as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the emerging Local Plan to be positively prepared.

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

3.24 At this stage of plan preparation and until the Spatial Strategy is confirmed (including the scale of individual site allocations), BDW do not consider that it will be necessary for the Council to plan for a stepped housing requirement. To be proactive and avoid delaying delivery too late in the Local Plan period, the Council should be planning as a minimum to meet its annual housing requirement of 1,928 dwellings.

[7] Paragraph 2.3

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?

3.25 The Council's proposed spatial strategy seeks to direct new development firstly towards previously developed sites within settlements, and then 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, existing services and infrastructure. The Council suggests that this may require the release of Green Belt land, depending on the settlement.

3.26 To ensure the delivery of sufficient homes across all types and tenures, BDW considers it necessary to plan for development on land outside of existing settlement boundaries. Given the extent of Green Belt designation in CWAC, particularly in the north of the borough where many key settlements such as Frodsham are significantly constrained, some Green Belt release will be essential.

3.27 The I&O Consultation Document identifies around 6,000 homes from existing planning permissions and a further 5,000 homes on previously developed land without permission within main urban areas and Key Service Centres. However, this combined capacity of approximately 11,000 homes falls significantly short of the housing need identified over both a 15-year (28,920 dwellings) and 20-year (38,560 dwellings) plan period. This leaves a shortfall of 17,920 and 27,560 dwellings respectively. Furthermore, the deliverability of the identified supply has not yet been fully tested.

3.28 Paragraph 146 of the NPPF confirms that exceptional circumstances for Green Belt release can arise where housing needs cannot otherwise be met. In order to justify such release, the Council must produce robust evidence on the capacity of brownfield land and urban sites, building on existing monitoring data. This evidence must consider both deliverability and viability.

3.29 When assessing sustainable locations for growth, the Council should not be unduly constrained by existing Green Belt boundaries. In some cases, development within the Green Belt adjacent to urban areas may be more sustainable than development further afield beyond the Green Belt, particularly where the latter would result in greater car dependency and infrastructure demands.

3.30 It is clear that development beyond current settlement boundaries will be required to meet both housing and employment needs. This will inevitably include Green Belt release in the north of the borough. The Council's approach should be informed by an up-to-date and robust Green Belt Assessment (GBA), prepared in line with the NPPF and Planning Practice Guidance, including consideration of 'grey belt' opportunities.

3.31 Finally, in accordance with paragraph 148 of the NPPF, the Council must consider not only currently sustainable sites but also those that could become sustainable or help improve the sustainability of existing settlements, as part of the Land Availability Assessment process.

Question SS 5 – Do you agree with the suggested policy approach towards the settlement hierarchy, as set out in SS4 'Settlement hierarchy' above? If not please suggest how it could be amended.

3.32 The emerging Local Plan should set out a logical and justified settlement hierarchy which meets all of CWAC's housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation.

3.33 The current spatial strategy, as set out within LPP1 Policy STRAT 2 (Strategic Development), distributes the majority of development to the larger settlements in the borough - Chester, Ellesmere Port and Northwich. Frodsham is currently designated as a Key Service Centre STRAT8 (Rural Area). This designation recognises that Frodsham is one of the *"most sustainable rural locations"* in the borough. Key Service Centres are acknowledged in LPP1 Policy STRAT8 to *"provide a good range of facilities and services and will be the focus for new development in the rural area"*.

3.34 The I&O Consultation Document proposes to add Frodsham, Winsford, Neston & Parkgate to the list of larger settlements, alongside continued recognition of the important role of Key Service Centres, and other Local Centres, which have a level of facilities and services to meet the needs of residents and surrounding areas.

3.35 BDW strongly agree with Frodsham's elevated status within the proposed settlement hierarchy, as the town represents a logical and sustainable focus for growth. Therefore, Frodsham should accommodate a commensurate level of growth to ensure it meets the needs of a successful market town.

3.36 The Places Background Paper confirms that Frodsham benefits from a range of existing services and facilities, as set out at paragraph 2.21 above, which confirms the town as a sustainable location for development.

3.37 Furthermore, the Frodsham Housing Needs Report (January 2025), prepared by Cheshire Community Action on behalf of CWAC Council, confirms that, while Frodsham benefits from a sought-after location in the Cheshire countryside and strong commuter links to Chester and Manchester, it nevertheless faces several challenges. These include an imbalanced resident demographic, with a higher proportion of older residents compared to the rest of the borough; and strong demand for affordable housing, evidenced by 45 individuals on the housing register with a local connection to Frodsham, and 83% of survey respondents confirming they would support an affordable housing development for local people.

3.38 The summary of CWACC's own evidence demonstrates that Frodsham has high levels of housing demand; an imbalanced population and housing tenure composition; a significant affordability gap and a high level of affordable housing need. Therefore, Frodsham's elevated status as a market town and the proportionate level of growth necessary in such locations, will address these important issues.

Question SS9 – Have circumstances changed since the adoption of the Local Plan (Part One), that would now justify Green Belt release?

3.39 Yes, there have been significant changes since the adoption of the current Local Plan that would now justify Green Belt release; including planning reforms and updated national policy and guidance. This has been recognised by the Council in their decision to prepare a new Local Plan, as set out in the CWAC January 2025 Report to Cabinet[8].

3.40 As set out in the response to Question SS 1 above, CWAC's housing need, as defined by the standard methodology, requires a *minimum* of 1,928 dwellings per annum to be delivered, which equates to a total of 28,290 dwellings over a 15-year plan period or 38,560 dwellings over a 20-year plan period.

3.41 The existing Green Belt boundary covers almost half of the borough and presents a significant constraint to the growth of settlements, particularly within the northern part of the borough. The NPPF (paragraph 146) is clear that the exceptional circumstances required for Green Belt release may include circumstances where a Local Authority cannot meet its identified housing need through other means. Policy 146 goes on to explain that, in this case, authorities should review Green Belt boundaries in accordance with the policies in this Framework and propose alterations to meet these needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.

3.42 The December 2024 iteration of the NPPF introduces the concept of 'grey belt', as defined within NPPF Annex 2[9]. Paragraph 148 of the NPPF confirm that, where it is necessary to release Green Belt land for development, plans should give priority to previously developed land, then consider grey belt which is not previously developed, and then other Green Belt locations.

3.43 As set out at paragraph 3.25 above, CWAC Council's own evidence identifies that there is not enough land to accommodate the borough's housing needs. BDW therefore reaffirm that the Council undertake a Green (and grey) Belt Appraisal to inform a review of the Green Belt boundaries. Reflecting that the extent of housing and employment needs to be accommodated will require a detailed appraisal of the contribution that land surrounding sustainable settlements make to the purposes of including land in the Green Belt, including identifying grey belt land in accordance with the February 2025 PPG.

3.44 As discussed in Section 2 and in detail within Appendix 3, the planning application for the Site confirms that the site comprises 'grey belt' land. Sites such as this, which are clearly evidenced to meet the definition of grey belt, should take priority over other Green Belt locations, when allocating sites to meet identified needs in accordance with paragraph 148 of the NPPF. Should the Council not agree that the Site comprises 'grey belt' land, as per paragraphs 2.24-2.29 in Section 2, the Site is demonstrably suitable,

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8 Report to Cabinet - Local Plan Post NPPF Changes Jan 25.pdf

9 *"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."*

available and achievable, such that exceptional circumstances exist to justify the removal of the land from the Green Belt and allocate it for residential development.

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

3.45 BDW reaffirm that the concept of grey belt, as introduced in the December 2024 iteration of the NPPF, with supplementary guidance provided in the February 2025 updates to Green Belt PPG, is an important consideration that should be taken into account. The emerging Local Plan must have full regard to the latest NPPF policy and the evidence base must include an assessment of whether land parcels within the Green Belt meet the definition of grey belt.

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) Option D – None of these

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

3.46 As explained above, BDW does not consider Option A to be an appropriate spatial strategy, as it fails to include any release of Green Belt land. Such release is a necessary component to meet the borough's housing needs. This is supported by the Council's own evidence base on land availability, which identifies a potential capacity of approximately 11,000 homes. As noted above (paragraph 3.25), there is insufficient land within the urban area to accommodate the minimum requirement of 28,290 dwellings over a 15-year plan period, or 38,560 dwellings over a 20-year period. Consequently, additional housing land must be identified beyond the existing settlement boundary, including land currently designated as countryside or Green Belt.

3.47 While BDW are generally supportive of Option B, which identifies significant Green Belt release around Ellesmere Port, Northwich and Chester, it is noted that larger settlements such as Neston and Frodsham will have a relatively limited level of new development compared to their size, transport connections and services. In particular, as Frodsham now has an elevated status in the settlement hierarchy as a 'market town', a proportionate level of growth should be assigned to Frodsham, as opposed to relying upon the previous level of distribution.

3.48 Option C seeks to direct development in and around locations which offer sustainable transport connections. This will require Green Belt release around more settlements and would introduce more development in some of the smaller settlements including Hooton, Capenhurst, Elton, Acton Bridge and Mouldsworth. A review the approach to locations for development in Option C identifies that, whilst the sites may be

sustainable in respect of their proximity to a rural train station, many of the proposed locations are limited in terms of their access to essential services and facilities such as schools and healthcare. BDW therefore urges the Council to exercise caution in prioritising transport hubs as the primary basis for new development. A more balanced, holistic approach to assessing site sustainability is recommended.

3.49 Under Option A/B, Frodsham is identified to accommodate up to 500 homes, whereas Option C proposes a significantly higher level of growth, ranging from 1,500 to 3,000 homes. The Dig Lane site (ref. FRO03) is included as a potential growth option for housing development in Frodsham in both Options B and C. Option A involves no Green Belt release around Frodsham.

3.50 As such, BDW recommend that the Council adopt a hybrid approach between Options B and C; one that recognises the strategic role of larger settlements such as Frodsham, while ensuring that sustainable considerations extend beyond transport accessibility alone. Further detail on this approach is outlined within Chapter 6 of the Pegasus representations.

Question SS 41 – Which of the identified potential growth areas around Frodsham do you consider to be the most suitable?

3.51 BDW consider that growth option FRO03 is the most suitable, as demonstrated throughout these representations. The area is located adjacent to the existing settlement of Frodsham, and benefits from existing natural boundaries including the A56 Chester Road to the east, the railway line to the north, and residential development to the south. The Site is sustainably located to make best use of existing sustainable transport provision; and is located within proximity to a number of facilities and services, which are accessible via a number of sustainable non-car modes including walking and cycling. The existing public transport provides a wide range of connections to key locations such as Manchester, Liverpool and is of high frequency.

3.52 The planning application for Dig Lane is supported by a range of technical assessments, which confirm that the Site is a suitable location for housing development. In particular, and as noted above, the submitted Green and Grey Belt Appraisal confirms that the Site meets the definition of grey belt, and that the Proposed Development meets the criterion in paragraph 155 of the NPPF and can be regarded as appropriate development.

3.53 The application also confirms that the Proposed Development will follow the Golden Rules in accordance with paragraph 151 of the NPPF, which states: *"where Green Belt land is released for development through plan preparation or review, the 'Golden Rules' in paragraph 156 should apply."*

3.54 The application demonstrates that the Proposed Development is underpinned by a high-quality approach to design, layout and landscape which respects and responds to the evidenced Site constraints and the wider environment. The application was accompanied by an Environmental Impact Assessment Screening Request (LPA ref. 25/02187/SCR), which includes a detailed appraisal of the construction and operational stage effects associated with the Proposed Development, and confirms that no likely significant effects have been identified.

3.55 BDW encourages the Council to consider the submitted application materials as part of the process for selecting growth locations and residential allocations within the emerging Local Plan. The work undertaken to date clearly demonstrates that the Site is both suitable and sustainable for development.

Question SS 42 – Do you have any further comments about any of the potential growth areas identified around Frodsham?

3.56 BDW supports accommodating sufficient growth in Frodsham to meet identified needs. This may necessitate the allocation of more than one growth option. As aforementioned, the Site forms the northernmost part of the identified Frodsham growth area FRO03 (i.e. directly adjacent to the settlement boundary). The remainder of the land within FRO03 therefore represents a logical and coherent extension for accommodating future growth beyond BDW's land interests at Dig Lane. In this context, it is recommended that the entirety of the FRO03 growth location be allocated for development within the new Local Plan.

3.57 Whilst BDW is generally supportive of all sustainable growth in Frodsham, it is noted that the potential growth locations FRO01 and FRO02—both situated to the east of the town—lack the strong natural boundaries that define FRO03. As a result, these sites present a greater risk of contributing to urban sprawl.

3.58 Furthermore, FRO03 benefits from direct access to the A56 Chester Road, a key arterial route offering strategic connections to Runcorn, Widnes, Chester, Speke, and Liverpool. In contrast, FRO01 and FRO02 are accessed via smaller local roads, such as Townfield Lane. The capacity of these routes to accommodate development of the scale proposed should therefore be robustly assessed.

3.59 In summary, it is strongly recommended that growth location FRO03 be allocated for development within the new Local Plan. The land offers a more suitable and sustainable location for growth, with BDW well-positioned to deliver development on part of the site in the short term. Development at Dig Lane could also facilitate infrastructure improvements, supporting the delivery of the wider FRO03 area in a sustainable and coordinated manner.

3.60 The allocation of any growth areas should also be supported by sufficient and robust evidence demonstrating that the sites are suitable to accommodate development.

Question SS 43 – Are there any constraints, including infrastructure provision that should be considered for Frodsham when developing the new Local Plan?

3.61 The Places Background Paper 2024 highlights the availability of services and facilities in Frodsham, as outlined in paragraph 3.34 above. It confirms that Frodsham benefits from a broad range of existing services and infrastructure. Accommodating new housing growth in the settlement would support the long-term viability of these existing facilities and could be aligned with infrastructure improvements, to be identified by the Infrastructure Delivery Strategy, which will form part of the evidence base.

Question FR 1 – Do you agree with the suggested policy approach towards Frodsham, as set out in FR 1 'Frodsham' above? If not please suggest how it could be amended?

3.62 FR 1 identifies Frodsham as a market town within the settlement hierarchy of the emerging Local Plan. BDW supports the elevation of Frodsham within this hierarchy and encourages the Council to recognise the town as a sustainable location capable of accommodating a proportionate level of future growth.

3.63 It is noted that the proposed policy approach seeks to align with the objectives and projects identified in the FNP. However, it is reiterated that the FNP was prepared under the provisions of LPP1—albeit nine years after its adoption—and is therefore based on policies that are now considered out of date. As set out in paragraph 3.11 above, following the adoption of the new Local Plan, it will be necessary for the FNP Group to undertake a review and update of the neighbourhood plan to ensure continued alignment with the strategic policies of the NPPF and the new Local Plan, in accordance with paragraph 30 of the NPPF.

3.64 To support the continued vitality of Frodsham as a market town, additional site allocations beyond those identified in the FNP will be required. As outlined throughout these representations, this will necessitate the allocation of land beyond the existing settlement boundary, including sites within the Green Belt. BDW therefore reiterates its view that FRO03 represents a prime opportunity for sustainable growth and would make a valuable contribution to meeting identified housing needs.

3.65 Otherwise, BDW supports the overarching principles of the proposed policy approach, particularly the emphasis on delivering a mix of housing, including affordable homes for young people and families, starter homes, and smaller properties to support downsizing, as well as homes that meet the needs of older residents.

3.66 As part of the preparation of the planning application at Dig Lane, BDW undertook public engagement to provide local residents and stakeholders with the opportunity to share their views. Feedback was invited through a range of channels, including a dedicated website, phone line, email, and Freepost. Most notably, there has been overwhelming support for the provision of 3 / 4-bedroom family homes, affordable housing, and the enhanced pedestrian and cycle links. Out of the 243 responses received, 51 respondents expressed an interest in purchasing a home on the Site. This equates to over 20% of the total respondents. This reflects the clear need for family and affordable housing in the locality and CWACC generally.

3.67 As such, it is recommended that the Local Plan be informed by a robust and up-to-date Housing Needs Assessment (HNA). It is also important that the policy remains flexible and not overly prescriptive, to avoid constraining or delaying housing delivery. To ensure the Council's requested housing mix remains accurate and effective, the HNA should be reviewed and updated regularly to reflect evolving market conditions and local needs. This will help maintain a responsive and evidence-based housing strategy over the lifetime of the Plan.

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.

3.68 BDW are in general agreement with the suggested policy approach towards Green Belt and countryside. In particular, the relevant Green Belt policy must align with the latest national policy context regarding the Green Belt, as set out in the revised NPPF (December 2024) and the updated PPG on Green Belt (February 2025). This includes recognising the introduction of 'grey belt' land and its potential role in supporting housing and employment growth.

3.69 The Council should also give due consideration to the findings of the emerging Green Belt Review, once this evidence becomes available. It is essential that the Council consults on the proposed methodology and approach to the Green Belt Assessment in advance of undertaking the work, to ensure transparency and allow for stakeholder input.

3.70 In addition, the existing countryside boundaries will need to be amended to reflect the spatial strategy, revised settlement boundaries, and proposed site allocations necessary to meet the borough's identified housing and employment needs within the emerging Local Plan.

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.

3.71 BDW advises that the general provisions set out in LPP1 STRAT11 are appropriate and accepts the approach to amend the policy to ensure educational needs are included. Specific comments are provided below in relation to the identified topics for infrastructure and developer contributions:

- Net Zero objectives – BDW advises caution in seeking to secure these outcomes solely through developer contributions. National regulations and planning policy already seek to achieve net zero goals, and duplicating such requirements at the local level risks creating unnecessary complexity and restriction. It is important that any local policy complements, rather than duplicates, existing frameworks.

- Digital Infrastructure – The policy should provide for a degree of flexibility, particularly in relation to the delivery of digital infrastructure such as electronic communications networks and high-speed broadband. Delivery of such infrastructure may be constrained by technical or viability issues, and the policy should recognise that such requirements should only be applied where demonstrably feasible and deliverable, without prejudicing the acceptability of a proposed development. The requirement on developers should not go beyond that set out in Building Regulations, as set out by the HBF.

- Public Art – BDW does not support the inclusion of public art as a requirement for developer contributions, as it does not constitute essential infrastructure necessary to make development acceptable in planning terms.

- Maximising employment opportunities for residents – BDW endorses Home Builders Federation ('HBF') position that the approach to this should be developed in dialogue with the HBF and wider industry. The costs associated with this should also be tested within the emerging Viability Assessment.

3.72 The policy should emphasise the importance of a collaborative and transparent relationship between the local authority and developers, ensuring that infrastructure delivery is effectively coordinated and proportionate to the development proposed. Furthermore, the Viability Assessment and Infrastructure Delivery Plan should test all of these costs, ensuring the delivery of the plan is not compromised, in accordance with paragraph 35 of the NPPF.

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

3.74 BDW considers that developer contributions should be proportionate and directly related to the scale and type of development proposed. While it is appropriate for the majority of infrastructure contributions to be secured from major developments, there may be circumstances where smaller developments have a cumulative impact on infrastructure and should contribute accordingly—provided this is justified, reasonable, and does not undermine viability.

3.75 The definition of 'major development' should align with the existing national definition set out in the Town and Country Planning (Development Management Procedure) (England) Order 2015. This provides clarity and consistency across local authorities. Any local variation to this definition should be clearly justified by evidence and tested through the Local Plan process.

3.76 Flexibility should also be retained to ensure that contributions are only sought where they meet the statutory tests set out in Regulation 122 of the Community Infrastructure Levy ('CIL') Regulations 2010 (as amended), particularly in terms of necessity, and direct relationship to the development.

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

3.77 BDW acknowledges that it is appropriate for developers to contribute to the infrastructure necessary to make their developments acceptable in planning terms. However, such contributions must be fair, proportionate, and aligned with the statutory tests set out in Regulation 122 of the CIL Regulations 2010 (as amended), and paragraph 58 of the NPPF.

3.78 BDW emphasises the importance of a collaborative and coordinated approach between the Council and developers. Infrastructure planning should be based on an understanding of the cumulative impact of committed and planned development across the area, rather than being addressed in isolation on a site-by-site basis. This

ensures that infrastructure is strategically planned, appropriately phased, and capable of supporting both current and future needs.

3.79 Requiring individual developers to meet the full cost of infrastructure in isolation risks undermining the viability and deliverability of schemes, particularly where the infrastructure serves a wider area or multiple developments. In such cases, the cost burden should be shared equitably, with consideration given to funding mechanisms such as Section 106 agreements, the CIL, or other public funding sources where appropriate.

Question ID 4 – In the event of viability being an issue how could the new Local Plan prioritise the provision of infrastructure across the borough and/or on a settlement-by-settlement basis?

3.80 BDW supports a pragmatic and flexible approach to infrastructure delivery, particularly where viability is a recognised constraint. The Local Plan should establish clear priorities for infrastructure provision, informed by robust evidence such as an Infrastructure Delivery Plan (IDP), viability assessments, and engagement with infrastructure providers.

3.81 Where viability issues arise, the Plan should identify which infrastructure types are considered critical to support development (e.g. education, transport, utilities) and which are desirable but secondary. This prioritisation should be clearly set out and agreed through plan-making to provide transparency and certainty for both developers and the local authority.

3.82 A settlement-by-settlement approach may be appropriate where infrastructure pressures vary significantly across the borough. This would enable a more locally responsive strategy that reflects the scale of growth, existing infrastructure capacity, and site-specific constraints in each area.

3.83 The Local Plan should continue to support a flexible, collaborative approach to negotiations on planning obligations, allowing for site-specific viability to be taken into account. Where full contributions are not achievable, policies should allow for open-book viability assessments and a transparent process for considering trade-offs, such as deferral, phasing, or the use of review mechanisms to secure contributions over time.

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?

3.84 BDW supports the principle of delivering a range and choice of homes that meet local needs, which is informed by up-to-date evidence, agrees that the emerging Local Plan should promote a mix of house types, sizes, and tenures to ensure choice for homebuyers and respond to demographic and market trends.

3.85 However, it is essential that any housing mix policy provides flexibility and is not overly prescriptive, to avoid impeding housing delivery. Policies should allow for changing market demands over time and between local areas. In addition, housing mix requirements should take into account the scale and characteristics of individual sites, with flexibility to depart from a fixed mix where justified—particularly where site constraints or viability considerations indicate that an alternative approach would be more appropriate.

3.86 The Council suggest that, if justified by evidence, a new policy will be brought in to require compliance with Nationally Described Space Standards ("NDSS"). UK Government has made clear that the NDSS are intended to be optional and should only be introduced where there is a clear need for them and they retain development viability. The evidence required to justify NDSS policies is set out within PPG, which includes evidencing need, viability and timing. BDW will provide further comment once the necessary evidence is made available for consultation.

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?

3.87 A percentage policy approach is overly restrictive, failing to allow for changes in market conditions which may occur in different parts of the borough and/or over the lifetime of the Local Plan and changes in site specific circumstances. It is important that the policy remains flexible, and the Council's requested housing mix should be informed by a regularly updated HNA which reflects evolving market conditions and local needs.

Question HO 4 – Do you agree with the suggested policy approach towards delivering affordable housing, as set out in HO2 'Delivering affordable housing' above? If not, please suggest how it could be amended?

3.88 The Council is proposing to set out the percentage of affordable housing required across the borough including potentially by sub-area, for development sites of 10 or more dwellings (in designated rural areas it will be three or more dwellings). The policy will reflect the Government's requirement, as set out at paragraph 67 of the NPPF, for housing sites in the Green Belt to provide at least 50% affordable housing. BDW reiterate that the requirement for 50% affordable provide relates to sites released from the Green Belt, and this level of provision should not be required for sites outside of the Green Belt.

3.89 BDW considers that it is appropriate for the Council to plan for the affordable needs of its community, and to ensure that it does this in line with the requirements of paragraph 35 and 64-66 of the NPPF.

3.90 Paragraph 67 of the NPPF confirms that, as part of the 'Golden Rules,' specific affordable housing requirements should be established for major housing developments—whether on land proposed for release from the Green Belt or on land within the Green Belt where development may be permitted. For land released from the Green Belt, a minimum affordable housing provision of 50% is required. However, the NPPF policy also allows flexibility for development to be except should this requirement make the scheme unviable.

3.91 Paragraph 68 of the NPPF goes on to state that *"the affordable housing requirement for land within or released from the Green Belt may be set at a single rate or be set at differential rates, subject to meeting the criteria of the Golden Rules."* As such, in accordance with national policy, the Council's affordable housing requirements should be clearly set out and evidenced as viable through a Viability Appraisal. BDW also recommends that flexibility is embedded within the policy to ensure that affordable housing provision responds to local needs data and viability on a case-by-case basis.

Question HO 6 – Do you agree with the suggested policy approach for residential development proposals, as set out in HO3 'Proposals for residential development' above? If not please suggest how it could be amended?

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Question HO 7 – Are Local Plan (Part Two) policies DM19, DM21 and DM22 working effectively; remain relevant; or are all issues covered by current national policy and guidance?

3.92 The policy approach for HO3 seeks to adopt the same approach as Local Plan Part Two ('LPP2') Policy DM19, whether this be retained as a separate policy, or the general policies incorporated into other policies in the new Local Plan. LPP2 Policies DM21 and DM22 are proposed for retention, with only minor amendments.

3.93 LPP2 Policy DM19 relates to proposals for residential development on land not allocated for development, such as on sites within the countryside or Green Belt. It is reiterated that the policy's approach is fully consistent with the latest iteration of the NPPF, particularly paragraphs 82-83 which address rural housing needs and sustainable development in rural areas.

3.94 It is noted that the current wording of Policy DM19 replicates LPP1 Policies STRAT 1, STRAT 9 AND SOC2. BDW urges caution in duplicating policy content within the Local Plan. Development Management policies should provide additional clarity and implementational detail to guide decision-making, rather than restate strategic policy objectives already set out elsewhere in the plan. For this reason, it is suggested that the general policies are incorporated into other policies in the new Local Plan.

Development Management Policies

Open Space

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.

3.95 BDW are in general agreement with the policy approach to open space, sport and recreation. It is noted that the policy approach seeks to requires all major development to make provision for open space in accordance with the current open space quantity and accessibility standards and onsite thresholds as set out in the current LPP2 Policy DM35, including that all forms of residential development should make provision for open space.

3.96 However, BDW recommends that the standards underpinning the policy be reviewed and informed by up-to-date, robust evidence that is specifically prepared to support the new Local Plan. In addition, it is important that the policy allows for a degree of flexibility in its application. This is to ensure that the requirement to deliver specific types of open space does not unduly impact development viability or the ability to bring forward sustainable, deliverable housing schemes—particularly where certain typologies of open space may not be appropriate or necessary in all contexts.

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?

3.97 LPP2 Policy DM36 currently sets out the approach to securing developer contributions towards sport and recreation provision, including playing pitches. The policy confirms that contributions will be required to enhance existing provision where new residential development generates additional demand, and where existing facilities are insufficient to meet current or future needs. This is to be informed by Sport England's strategic planning tools and the findings of the Playing Pitch Strategy, in order to determine the appropriate amount and type of contribution or on-site provision.

3.98 BDW is broadly supportive of this evidence-based and context-sensitive approach. In particular, the recognition that the scale and nature of contributions should reflect the specific circumstances of each site is welcomed. This provides a fair and proportionate mechanism for securing necessary infrastructure while allowing for flexibility in delivery.

3.99 To ensure the continued effectiveness of this approach, BDW recommends that the thresholds and methodologies used to calculate contributions are regularly reviewed and clearly set out, supported by up-to-date local evidence within the Playing Pitch Strategy. This will help provide clarity for developers and ensure consistency with national policy and the relevant legal tests for planning obligations.

Question OS 3 – Is the current evidence sufficient or does it require updating (Open Space Study and Playing Pitch Strategy)?

3.100 As noted in the response to Question OS1, BDW considers it essential that the policy is underpinned by robust, relevant, and up-to-date evidence. The current Open Space Study and Playing Pitch Strategy, which covers the period from 2016–2020, is now significantly out of date and should be reviewed and updated as a priority.

3.101 Updated evidence is necessary to accurately reflect the current level of provision, usage, condition, and future needs across the borough. It will also help ensure that developer contributions and on-site provision requirements are appropriately tailored, justified, and aligned with the latest national planning guidance.

3.102 To remain effective throughout the plan period, the evidence base should also be regularly reviewed and updated, enabling the policy to respond to changing local circumstances.

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?

3.103 As per the answer to Question OS 1 above, BDW recommend that the policy allows for a degree of flexibility which takes account of site context and viability of the scheme.

Flood risk and water management

Question FW1 – Do you agree with the suggested policy approach towards flood risk and water management, as set out in FW 1 'Flood risk and water management' above? If not please suggest how it could be amended?

3.104 Whilst BDW are in general support of the policy approach in respect of flood risk and water management. However, it is noted that the policy approach seeks to apply a borough wide Sequential Test where required in line with the NPPF and PPG.

3.105 It is widely acknowledged that the recent revisions to paragraphs 171–174 of the NPPF impose an overly stringent requirement to apply the Sequential Test in areas at risk of surface water flooding. Specifically, paragraph 174 states that *"the aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding from <u>any source</u>"* (emphasis added).

3.106 The Environment Agency's Flood Risk Mapping, which is widely used to identify surface water flood risk, is currently recognized as inaccurate, and lacks specificity when downloaded for use in software applications. Obtaining detailed and reliable data on surface water flooding therefore places an undue burden on developers, requiring extensive technical and geophysical assessments at the earliest stages of planning.

3.107 Moreover, the application of the Sequential Test to surface water flooding has recently been addressed in numerous appeal decisions, where Inspectors have permitted development despite the Sequential Test not being fully met[10]. In these cases, it was determined that the absence of a Sequential Test would not lead to significant real-world consequences once site-specific flood risk mitigation measures are applied[11].

3.108 In light of these considerations, BDW strongly recommends that the policy approach to Sequential Tests incorporates flexibility to assess flood risk from any source on a site-by-site basis. This would help avoid imposing unnecessary and potentially abortive work on developers, as well as the Council, while still ensuring effective flood risk management.

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?

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10 Land North East of Grove Lane, Lydney [APP/P1615/W/25/3363981]

11 Land at Ham Road, Faversham, Kent [APP/V2255/W/24/3350524]

3.109 BDW supports the proposed approach to consolidate LPP1 Policies ENV 3 and ENV 4, along with relevant elements of LPP2 Policies DM44 and DM45, into a single, comprehensive policy on green infrastructure, biodiversity, and geodiversity.

3.110 The creation of an integrated policy is welcomed, as it provides greater clarity and consistency for both developers and decision-makers. A single, consolidated policy will help ensure that the relevant policy tests are clearly articulated and applied in a proportionate and effective manner, while reducing duplication across the Local Plan.

3.111 To ensure the effectiveness of the proposed policy approach, BDW recommends that the policy strikes a balance between protecting important green and natural assets and supporting sustainable development. It should be informed by up-to-date ecological evidence and allow for flexibility in its application, taking account of site-specific circumstances, viability considerations, and the potential for biodiversity enhancements to be achieved both on- and off-site where appropriate.

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

3.112 BDW acknowledges the Council's ambition to achieve a minimum of 16% tree cover in all wards across Cheshire West and Chester, and supports the principle of enhancing woodland and tree planting as part of new development where appropriate.

3.113 However, BDW cautions against the policy becoming overly prescriptive in its requirements—for example, by specifying required tree species, numbers, or replacement ratios such as a 2:1 standard, which does not take account of tree condition etc. As such, this level of detail may not be appropriate in all contexts and could undermine the deliverability or viability of development, particularly on more constrained sites.

3.114 The policy should allow for sufficient flexibility to enable site-specific solutions that deliver meaningful tree planting and green infrastructure enhancements, while recognising other design and viability considerations. Any tree replacement or contribution policy should be proportionate, supported by clear evidence, and include scope for off-site contributions where on-site delivery is not feasible.

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

3.115 BDW strongly advises against the Council imposing a mandatory biodiversity net gain (BNG) requirement that exceeds the 10% target set nationally. The current national requirement has been carefully calibrated to balance environmental benefits with the practicalities and viability of delivering development.

3.116 Increasing the mandatory BNG beyond 10% risks placing undue burdens on developers, potentially affecting the viability and delivery of sustainable housing and infrastructure. Instead, the Council should support a flexible approach that encourages enhancements above the national minimum where feasible, through incentives or partnership working, rather than making higher gains compulsory.

3.117 This approach will help ensure that biodiversity objectives are met without compromising the overall effectiveness and deliverability of the Local Plan.

Historic Environment

Question HI 1 – Do you agree with the suggested policy approach towards the historic environment, as set out in HE 1 'Historic environment' above? If not please suggest how it could be amended?

3.118 BDW are supportive of the proposed policy approach set out in HE 1. In particular, BDW agrees that development should be prevented where it results in substantial harm to or total loss of the significance of a designated heritage asset, unless it is demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. This approach is consistent with paragraph 214 of the NPPF.

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?

3.119 BDW supports the principle of delivering high-quality design and is generally supportive of the proposed policy approach set out in DS1. However, it is noted that the policy seeks to apply a wide range of national and local design standards and guidance, including:

- Nationally Described Space Standards (NDSS)
- National Design Guide
- National Model Design Code
- Manual for Streets
- Locally prepared Design Guides and Design Codes (including those from neighbourhood planning groups)

3.120 The cumulative application of all these standards risks creating an overly prescriptive approach that could constrain development and compromise scheme viability. Site-specific factors such as flood risk, ecology, highways, and utilities—each governed by their own technical requirements—must also be carefully balanced with design aspirations.

3.121 BDW recommends that the policy be amended to incorporate flexibility in its application. This will allow for site-responsive design solutions that achieve high-quality outcomes without being unduly restricted by a one-size-fits-all policy framework.

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

3.122 BDW would not object to the preparation of a borough-wide Design Code, provided it is used as a flexible guidance document rather than a rigid policy tool.

The Design Code should be proportionate, evidence-based, and allow for site-specific interpretation to reflect varying local character, development contexts, and technical constraints. It should also be subject to public consultation and viability testing to ensure it supports, rather than hinders, the delivery of sustainable development across the borough.

Energy and Sustainability

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?

3.123 BDW supports the objective of delivering high sustainability standards in buildings, in line with the Council's ambition to achieve net zero carbon emissions in new residential and commercial development. However, BDW strongly cautions against the introduction of local policy requirements that duplicate or go beyond sustainability standards already secured through national building regulations or other established frameworks. Such duplication risks creating unnecessary complexity, uncertainty, and potential viability issues for future development.

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

3.124 BDW supports a clear and consistent approach to sustainable design and energy efficiency. The National Design Guide energy hierarchy provides a nationally recognised and balanced framework that prioritises energy demand reduction, energy efficiency, and the use of low-carbon and renewable energy sources. As such, BDW considers it appropriate for the Local Plan to adopt this hierarchy, provided it is applied flexibly and in a manner proportionate to site-specific constraints and viability considerations.

3.125 It is important that any adopted energy hierarchy aligns with national policy and avoids introducing prescriptive local requirements that could conflict with or duplicate national standards.

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?

3.126 BDW does not support the introduction of higher local standards that go beyond those set out in national Building Regulations. The Building Regulations are the appropriate mechanism for securing energy efficiency and carbon reduction in new development, and they are subject to regular review and updates to reflect national policy objectives, including the transition to net zero.

3.127 Introducing locally specific standards risks fragmenting policy requirements, adds complexity to the planning process, and may impact development viability. As above, BDW therefore considers that the Local Plan should align with national standards and avoid setting additional local requirements.

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?

3.128 BDW are generally supportive of the suggested policy requirements in principle, recognising the importance of promoting energy efficiency, low-carbon energy supply, and water conservation in new development. However, it is noted that the proposed criteria may be overly prescriptive, particularly if all developments, including at the outline stage, are expected to meet all requirements without exception.

3.129 It is therefore essential that the policy incorporates a degree of flexibility to reflect site-specific constraints, viability considerations, and practical feasibility. BDW also supports the inclusion of a carbon/energy offsetting contribution mechanism as a final resort, where on-site measures cannot reasonably be achieved, to ensure a deliverable approach to meeting the Council's wider sustainability objectives.

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

3.130 BDW supports the proposed policy approach under DS2, which provides an alternative route to compliance where residential development achieves a recognised certification, such as the PassivHaus standard. In such cases, a full sustainable design statement would not be required, and the submission of technical information demonstrating compliance with the relevant standard would be accepted. BDW welcomes this approach.

3.131 This flexibility is particularly beneficial for volume housebuilders, as it enables sustainability objectives to be met through an approach that is tailored to the specific nature and scale of development. BDW considers that recognising established industry standards is a positive mechanism to support delivery, while avoiding duplication of requirements or the achievement of requirements which are not applicable to certain types of developments.

4. Summary and Conclusion

4.1 These representations to CWACC's Regulation 18 Issues and Options Consultation have been prepared on behalf of Barratt David Wilson North West in respect of the Site at Dig Lane, Frodsham, which is currently subject to a live planning application and EIA screening request.

4.2 The representations demonstrate that the site represents a logical and sustainable location for development. While currently designated as Green Belt, the Site performs a weak Green Belt function, being contained by existing built-form and infrastructure and forming a logical extension to the adjacent settlement of Frodsham. The live planning application demonstrates that the Site comprises grey belt land, in these circumstances, such sites should be prioritised for allocation over other Green Belt locations, to meet identified needs in accordance with paragraph 148 of the NPPF. Should the Council not agree the Site comprises grey belt land, it has been demonstrated that the Site is suitable, available and achievable, such that exceptional circumstances exist to justify the removal of the land from the Green Belt and allocate it for residential development. Indeed, the Site is included as a potential allocation in Growth Options B and C (ref. FRO03).

4.3 As such, these representations encourage the Council to proceed with the elevated status of Frodsham within the settlement hierarchy, and in particular to pursue a spatial strategy that recognises Frodsham's role as one of the borough's larger and more sustainable settlements. In doing so, the Local Plan should allocate sufficient land to meet the borough's identified housing needs, including at locations such as the Site at Dig Lane, which offer logical and deliverable opportunities for growth. This submission also includes responses to specific consultation questions that are directly relevant to both the Site and the live planning application.

4.4 BDW would welcome the opportunity to engage further with the Council to discuss the content of these representations and the future role of the Site in meeting local development needs.

Appendix 1: Research Paper – Cheshire West and Chester's Objectively Assessed Housing Need

Research Paper

Cheshire West and Chester's Objectively Assessed Housing Need

Cheshire West and Chester Regulation 18 Local Plan Consultation

Barratt Homes, David Wilson Homes, Redrow Homes and Taylor Wimpey

26 August 2025

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1.0 Introduction

1.1 Lichfields has been instructed by a Consortium of housebuilders, Barratt Homes / David Wilson Homes, Redrow Homes and Taylor Wimpey [the Consortium], to prepare a Research Paper setting out the economic and social benefits to Cheshire West and Chester [CWaC or the Council] Borough of maintaining high levels of housing growth as the Council moves forward with the CWaC Local Plan [LP].

1.2 Lichfields has extensive experience and knowledge of CWaC, having helped to bring forward numerous housing developments in the Borough over recent years. As such, we are well placed, having the technical expertise and local experience, to prepare this Research Paper.

1.3 The CWaC LP is currently in the early stages of its preparation, with the Issues and Options (Regulation 18) Consultation open until the end of August 2025. The intention of this Research Paper is to help inform the Council's early decision making on its overall spatial strategy, particularly with regards to the scale of housing required in the Borough to meet its overarching economic and social objectives.

The Consortium

1.4 We would like to state at the outset the Consortium welcomes the Council's intention to commence preparation of a new LP. The Consortium has a clear and specific interest in the preparation of the LP in the context of continued growth and housing delivery in CWaC, and the multifaceted benefits this can bring to its local residents.

1.5 The Consortium includes a range of housebuilders operating in the North West housing market, namely Barratt / David Wilson Homes, Redrow Homes and Taylor Wimpey. Collectively, the Consortium has delivered a significant proportion of the homes delivered in CWaC since the adoption of the Local Plan in 2015.

1.6 Together, they have extensive experience in delivering homes in CWaC and have worked positively with the Council over recent years to achieve these mutual goals. They are keen to continue delivering high quality housing in sustainable locations over the coming years. The Consortium is therefore eager to see a LP which is positively prepared and aspirational.

Purpose of the Research

1.7 The Consortium welcomes the Council's intention to produce a new Local Plan in line with the requirements of the Local Plan Regulations (The Town and Country Planning (Local Planning) (England) Regulations 2012). It is vital that CWaC Borough Council seizes the opportunity to prepare a new Local Plan at this time to ensure it can respond positively to the housing and affordability crisis, plan for a higher housing requirement generated by the new standard method and respond to recent and future projected changes in the economy. It will provide an opportunity to ensure the Council continues to plan for and deliver the minimum levels of housing growth across the Borough expected by Government, and if justified, going beyond that to further the economic prospects of the Borough and life chances of its residents.

Structure of the Research Paper

1.8 The Research Paper is structured as follows:

- Chapter 2: Provides a review of relevant planning policy, strategic drivers and the macroeconomic context.
- Chapter 3: Undertakes a local contextual review and an objective assessment of the Council's housing requirement to understand the implications of the new standard method figure and why it should represent a minimum housing target;
- Chapter 4: Provides an assessment of the wider economic, health and societal benefits of new housing to understand the implications of pursuing a reduced housing target;
- Chapter 4: Summarises our key conclusions to the Research Paper.

2.0 Setting the Context

2.1 Significant changes have occurred politically and economically over the past 12 months. This has led to knock-on effects for national planning policy and guidance, including mandated housing need requirements for each local authority area, plans for a programme of new towns, as well as an intention to implement a new style of local plan making, national development management policies, the reintroduction of regional planning through spatial development strategies and devolved decision making for elected Mayors.

2.2 Given the intertwined nature of local plan making and national policy, and the ongoing changes to the planning system and challenges facing the Borough from a demographic and economic perspective, the Council needs to carefully consider the preparation of their new local plan, and in particular the role that housebuilding plays.

Standard Method 3

2.3 The new standard method for calculating local housing need is one of the central tenets of achieving the Governments objective to deliver 1.5 million homes in the current Parliament. The new method is much more ambitious than its predecessor (targeting 372,000 homes per year, up 21% from the previous target of 305,000). The new method aims to boost housing numbers by pinning targets to existing housing stock (rather than household projections, as per the former method) and then uplifting needs, and the target, based on affordability using a 5-year average.

2.4 At present, the SM3 results in a local housing need figure of 1,928 dpa for Cheshire West and Chester (considerably higher than the previous SM2 demographic-based figure of 489 dpa, and also much higher than the 2015 Local Plan figure of 1,100 dpa). The starting point for assessing local housing need in Cheshire West and Chester is therefore 1,928 dpa.

The National Planning Policy Framework

2.5 The National Planning Policy Framework [NPPF] places a particular emphasis on sustainable development, including the provision of homes and employment land, through a process of:

1. Supporting strong, vibrant and healthy communities by ensuring that there is a sufficient number and range of homes to meet the needs of present and future generations;
2. Fostering well-designed, beautiful and safe places that reflect current and future needs.
3. Reviewing employment land allocations to ensure the supply meets identified needs;
4. Proactively supporting sustainable economic development to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure; and,
5. Encouraging the effective use of land by re-using land that has been previously developed (brownfield land), with a view to promoting regeneration.

2.6 It states that the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner [§7].

2.7 Paragraph 11 of the NPPF retains the presumption in favour of sustainable development and refers to the expectation that plans should *"meet the development needs of their area"* and *"as a minimum provide for the objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

i *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area[7]; or*

ii *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*

2.8 Ultimately, the Council's Local Plan will need up-to-date and comprehensive evidence to inform its judgements about the need for land in its area, particularly in respect of housing needs and a review of Green Belt boundaries.

2.9 NPPF now states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or 'brownfield' land [paragraph 124].

2.10 The NPPF also reforms longstanding Green Belt Policy. Paragraph 146 sets out that housing, commercial and other development needs can expressly justify exceptional circumstances for Green Belt release, mandating that LPAs review and, if necessary, alter Green Belt boundaries when they cannot fully meet housing or commercial requirements unless there is evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.

Housing Need

2.11 Regarding housing need, the NPPF has reinforced the Government's objective of significantly boosting the supply of homes, making explicit reference to the overall aim of meeting an area's identified housing need, including with an appropriate mix of housing types for the local community [§61]. It states that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need [LHN] assessment, conducted using the standard method [SM3] [§62]:

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

2.12 Local Housing Need LHN is defined in Annex 2 of the NPPF as:

"The number of homes identified as being needed through the application of the standard method set out in national planning practice guidance."

2.13 Within this context of establishing need, the size, type and tenure of housing for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing (including Social Rent); families with children; looked after children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes [§63].

2.14 There is an increasing emphasis on the need to plan specifically for social rented properties in the latest iteration of the NPPF Paragraph 64 states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, including the minimum proportion of Social Rent homes. In the Annex 2 glossary, Social Rent is now given increased prominence and is defined separately from 'other affordable housing for rent' when discussing affordable housing.

2.15 The NPPF reconfirms that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. It goes on to state that the housing requirement may be higher than the identified housing need if it reflects growth ambitions linked to economic development or infrastructure investment:

"*The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.*" [§69]

2.16 This makes it increasingly important that assessments of housing needs include robust labour supply scenarios to ensure that future housing targets and employment land needs are in alignment.

2.17 The NPPF also includes a new paragraph extoling the virtues of mixed tenure sites:

"*Mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported). Mixed tenure sites can include a mixture of ownership and rental tenures*" [§71].

2.18 The NPPF goes on to say that authorities should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability [§72].

Planning Practice Guidance

2.19 The PPG states that the NPPF expects strategic policy-making authorities to follow the standard method in assessing local housing need. This uses a formula that incorporates a

baseline of local housing stock which is then adjusted upwards to reflect local affordability pressures to identify the minimum number of homes expected to be planned for[1].

2.20 The new standard method [SM3] identifies a minimum annual housing need figure and ensures that plan-making is informed by an unconstrained assessment of the number of homes needed in an area. It does not produce a housing requirement figure. It is important to note that the housing requirement may be higher than the identified housing need, and authorities should consider the merits of planning for higher growth if, for example, this would seek to reflect economic growth aspirations[2].

2.21 The minimum annual local housing need [LHN] figure calculated using SM3[3] firstly sets a baseline using 0.8% of the existing housing stock (including vacant units) for the local authority area (using the most recent data). Housing stock is used because it provides a stable and predictable baseline that ensures all areas, as a minimum, are contributing a share of the national total that is proportionate to the size of their current housing market.

2.22 The housing stock baseline figure is then adjusted based on the affordability of the area. The affordability data used is the ratio of house price to workplace-based earnings lower quartile median, published by ONS at a local authority level. The mean average affordability over the five most recent years, for which data is available, should be used.

2.23 The affordability adjustment is applied to ensure that SM3 responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes and set at a level to ensure that minimum annual housing need starts to address the affordability of homes[4].

2.24 The calculation is as follows:

Adjustment Factor = ((five year average affordability ratio-5)/5)×0.95 + 1

2.25 No adjustment is applied where the ratio is 5 or below. For each 1% the ratio is above 5, the housing stock baseline should be increased by 0.95%. An authority with a ratio of 10 will have a 95% increase on its annual housing stock baseline.

2.26 The PPG explains that the affordability adjustment is applied to take account of past under-delivery. As SM3 identifies the minimum uplift that will be required, it is not a requirement to specifically address under-delivery separately[5].

2.27 Whilst the resultant LHN figure (which can be applied to the whole plan period) should be kept under review and revised where appropriate, it may be relied upon for plan making for a period of 2 years from the time that the plan is submitted to the Planning Inspectorate for examination.

2.28 Whilst stressing that the standard method should be used to assess housing needs, the PPG notes that there are some specific circumstances in which an alternative approach could be justified. This is particularly relevant when considering economic aspirations of individual local authority areas or indeed sub-regions such as Cheshire and Warrington which take a

[1] 2a-002-20241212
[2] 2a-040-20241212
[3] 2a-004-20241212
[4] 2a-006-20241212
[5] 2a-011-20241212

strategic approach to economic development via The Cheshire and Warrington Local Enterprise Partnership [LEP].

Current Approach to Determining Housing Needs

2.29 For many years, UK governments have stressed the need to increase housing delivery to address the housing and affordability crisis, which is characterised by a shortage in new housing leading to ever-increasing housing costs. This imbalance between housing supply and demand has resulted in average house prices in England rising from £156,496 in July 2005 to £290,956 in July 2025 – a c.86% increase in 20 years which now represents around 8 times the average workplace-based salary. As a consequence, many homes are unaffordable for first time buyers and housing costs now consume a disproportionately large amount of a family's income, which in turn impacts on quality of life for many.

2.30 As a result of this crisis many people are living in overcrowded homes or homes unsuited to their specific needs, and younger people have little option but to live with their parents/guardians or extended family until they are much older as they are unable to save for a deposit to buy their own home whilst paying high rental costs. The average age of first time buyers has grown to approximately 33 years. A large number of people that are unable to meet their housing aspirations look to move out of particular market areas to where housing is more affordable which has many knock-on effects for local economic conditions and availability of community infrastructure.

2.31 The ability to meet housing aspirations is often out of reach of young people where owning a home is unachievable and renting is often insecure and expensive, particularly in places where the good jobs are most plentiful. This results in difficulties within the labour market where businesses find it more difficult to recruit and retain staff.

2.32 This results in unsustainable commuting patterns, with commuting distances increasing and challenges for some areas seeking economic growth but facing challenges accessing a labour force which can help realise these economic aspirations.

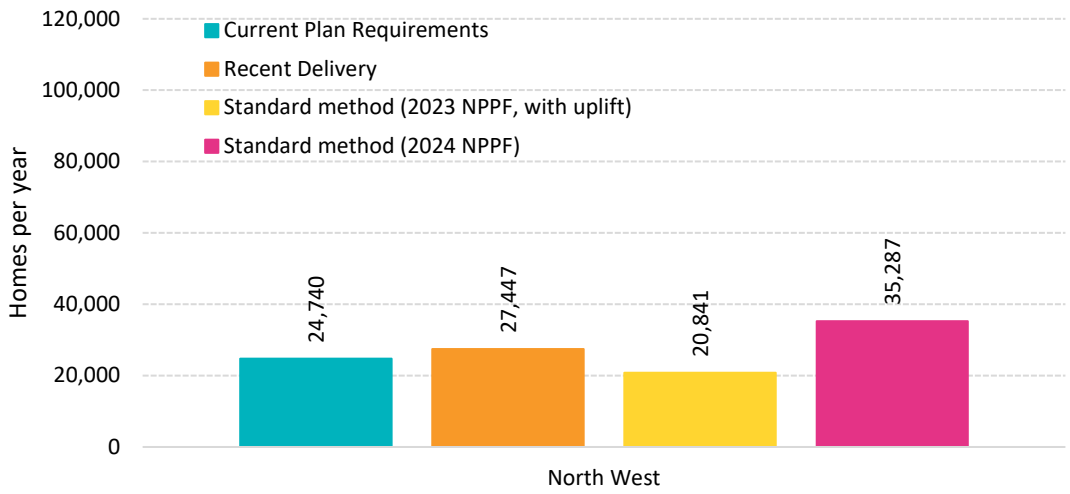
2.33 The Labour Government has ambitions to deliver 300,000 new homes a year in England, equating to 1.5 million homes in five years. These manifesto ambitions have led to changes in national planning and housing policy, as well as changes to the Standard Method for calculating housing needs.

2.34 The introduction of a standard method for assessing housing needs for planning purposes in 2018 was intended to shift time, resources and debate at local plan examination away from the 'numbers' question and towards the 'how' and 'where' of building new homes. This method - which equated to a figure of around 266,000 per annum when launched - was based on the 2014-based Household Projections plus an uplift for affordability, subject to a 'cap'.

2.35 In August 2020, the Government consulted on a proposed new Standard Method, which had a greater focus on affordability, the results of which were to boost the national figure to 337,000, with most of the increases in the areas where the gap between house prices and incomes was greatest. This unleashed a political and media storm that led to the proposal being dubbed 'the mutant algorithm', and the Government indicated that it would be reviewing its draft proposals. On 16th December 2020, the Government launched its solution: revert back to the method it introduced in 2018, but with a modification to top up the number in the 20 largest cities and urban areas by 35%, reflecting Government objectives to drive housing into existing urban areas and encourage brownfield development.

2.36 Fast forward to December 2024 and a new Labour Government, the scale of housing need has increased again via SM3 which now calculates a need for over 370,000 new homes per year. The national completion data for England shows just 153,900 homes were delivered in 2024, whilst starts had fallen to 77,780 – the lowest figure since 2009 in the aftermath of the financial crash. The scale of the challenge is clear to see nationally, and indeed in the North West where annual housing need is now in excess of 35,000 per annum, well in excess of the adopted local plan requirements or levels of recent delivery.

Figure 2.1 North West: Local Plan requirements, recent delivery and SM2/SM3 needs



Source: Lichfields analysis

Current Macro-economic Outlook

2.37 Macro-economic trends are a critical influence on the future performance of Cheshire West and Chester's economy and the resulting need for new housing to support the growth of the labour market.

2.38 The outbreak of Covid-19 and resulting pandemic developed rapidly with far reaching impacts on the economy and businesses across the country. The series of lockdown measures led to unprecedented shutdowns of large parts of the economy simultaneously, with effects being transmitted rapidly across all sectors.

Figure 2.2 GDP Monthly Index, Jan 2007 – June 2025

Source: ONS

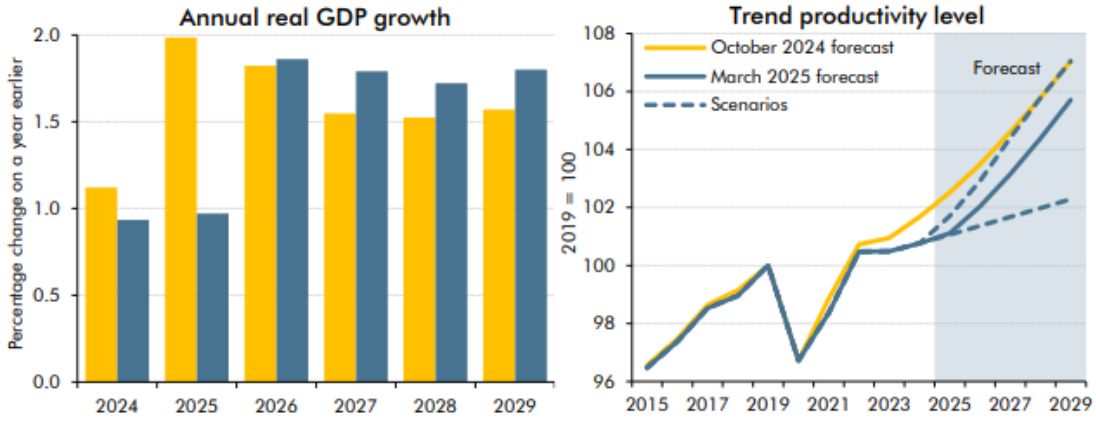
2.39 The latest official figures from the Office for National Statistics [ONS] show that UK monthly real Gross Domestic Product [GDP] grew by 0.4% in June 2025, following falls of 0.1% in both April and May 2025. Real GDP is estimated to have grown by 0.3% in the three months to June 2025 compared with the three months to March 2025.

2.40 All three main sectors grew in June 2025. Services output was the largest contributor to growth in monthly GDP, increasing by 0.3%, whilst production and constriction output increased by 0.7% and 0.3% respectively.

2.41 This means that GDP is now 4.3% above its pre- Covid-19 peak (January 2020). However, whilst services and construction are 6.3% and 8.2% above their pre-pandemic levels respectively, production is 12.1% below.

2.42 The Office for Budget Responsibility's [OBR's] latest Economic and Fiscal Outlook [EFO] (March 2025) reports that the economic outlook has recently become more uncertain, with output stagnating in the second half of 2024 and business and consumer confidence trending lower, alongside rising energy prices and greater geopolitical risk. The OBR reports it now expects real GDP growth of 1.0% in 2025 – half the 2.0% growth predicted in its October 2024 forecast, before recovering to around 1.75% per year over the rest of the decade.

Figure 2.3 Real GDP growth and productivity trend level



Source: OBR (2025): Economic and Fiscal Outlook (March 2025) – Chart 1.1

2.43 These forecasts bake-in government policy's effect on the housing market, with the OBR forecasting net additions to rise from a 12-year low in 2025/26 to reach 305,000 a year by the end of the decade, adding around 0.5% to the housing stock by 2029/30 and adding around 0.2% to economic output.

Wider Role of Housing in the Economy

2.44 Research has focused on the wider role that new housing can play in supporting economic growth, alongside the need to ensure greater value for money in public expenditure terms. The role of housing in the economy is complex, however; new housing delivery has the potential to generate a range of improved economic outcomes.

2.45 Housebuilding is a relatively labour-intensive activity and generates a high number of jobs per £1 of investment made. This drives up productivity, support existing jobs and make new job creation more likely. Strong local supply chains for materials also mean a far greater share of spending remains in the UK, rather than being channelled into imports as with many other sectors.

2.46 The economic contribution of new housing development has been acknowledged by Government announcements and policy documents, including the Planning White Paper: Planning for the Future[6], 'Fixing our broken housing market' Housing White Paper[7] and within the updated National Planning Policy Framework[8]. Housebuilding is therefore recognised in national policy as having a major role in stimulating economic growth and ensuring the long-term competitiveness of the UK economy.

2.47 Recent Lichfields research on behalf of the Home Builders Federation [HBF] assessed the economic footprint of the national housebuilding industry and quantified the economic contribution to the national economy[9]. This indicated that in 2023 c.240,000 new homes were built across the UK, generating the following economic impacts:

- £10.5 billion capital investment and expenditure on land and buildings for housing;
- £16.6 billion annual expenditure on supplies, with 90% retained in the UK;

[6] MHCLG (August 2020): *White Paper: Planning for the Future*
[7] MHCLG (2017): *Housing White Paper: 'Fixing our broken housing market'*
[8] UK Government (2024): *National Planning Policy Framework*
[9] HBF (2024): The Economic Footprint of House Building in England and Wales

- Supporting nearly 834,000 direct and indirect construction jobs;
- 271,000 people directly employed in the sector – 33% of the construction industry;
- 6,000 apprentices, 900 graduates and 3,300 other trainees supported;
- £6.4bn in tax raised, and £1.5bn of new infrastructure and public facilities funded; and
- Generating £53.3 billion of economic output.

2.48 In its latest Economic Outlook (March 2025)[10] the Office for Budget Responsibility [OBR] estimates that net additions to the housing stock will increase to 305,000 per year by the end of the decade, with around 170,000 additions due to the Government's reforms to the NPPF. The OBR goes on to predict that this will add 0.2% to the level of potential economic output by 2029/30 thanks to a boost in the productivity of residential construction and an increased flow of housing services, rising to 0.5% impact by 2034/35 when factoring in further agglomeration and labour mobility effects.

2.49 This indicates that the house building industry has an important role to play in stimulating economic growth and supporting significant levels of employment. The stark drop off in completions during 2024 will inherently mean greatly reduced economic contributions of the industry during that period.

Demographic Challenges

2.50 CWaC has the fourth largest resident population in the North West at 371,652 in 2019, having risen by 35,215 or 10.5% in the decade since 2014. In contrast, the populations of the North West and England & Wales have grown by 7.6% and 8.4% respectively over the same period[11].

2.51 The Borough's working age population (16-64) increased by 18,037 or 8.6% over this period, compared to an increase of 6.3% within the North West and 7.1% across England and Wales. Meanwhile, the number of retirement age residents (aged 65+) in the Borough has risen by 12,800 people or 19.0% since 2014, compared to 15.4% regionally and 13.9% nationally.

2.52 Population change in the past decade has seen the share of retirement-age residents increase from 20.1% in 2014 to 21.6% in 2024, whilst the share of working-age residents has fallen from 62.5% to 61.4%[12].

2.53 The latest 2022-based Sub-National Population Projections [SNPP] indicate that between 2025 and 2043 (the final year of the forecasts) the population of CWaC is projected to increase by 30,750 people or 8.6%; a level of growth much higher than projected across England at 6.3% and the North West's 5.4%. This is also the highest projected population growth of any of the neighbouring authorities, higher than Cheshire East's 6.4% and significantly above the projected growth in Halton (4.2%), Warrington (2.7%) and Wirral (2.7%) over the same time period, respectively.

2.54 Figure 2.4 shows the extent of overall projected population growth and growth by age cohort. It shows that:

[10] OBR Economic and Fiscal Outlook March 2025
[11] ONS (2025): Mid-Year Population Estimates 2024
[12] Ibid

1 CWaC is expected to experience a rise in 0-15 year olds of 2.5%, against an expected decline in this cohort regionally (-0.3%), nationally (-1.4%) and within the neighbouring authorities (-0.2% to -6.0%);

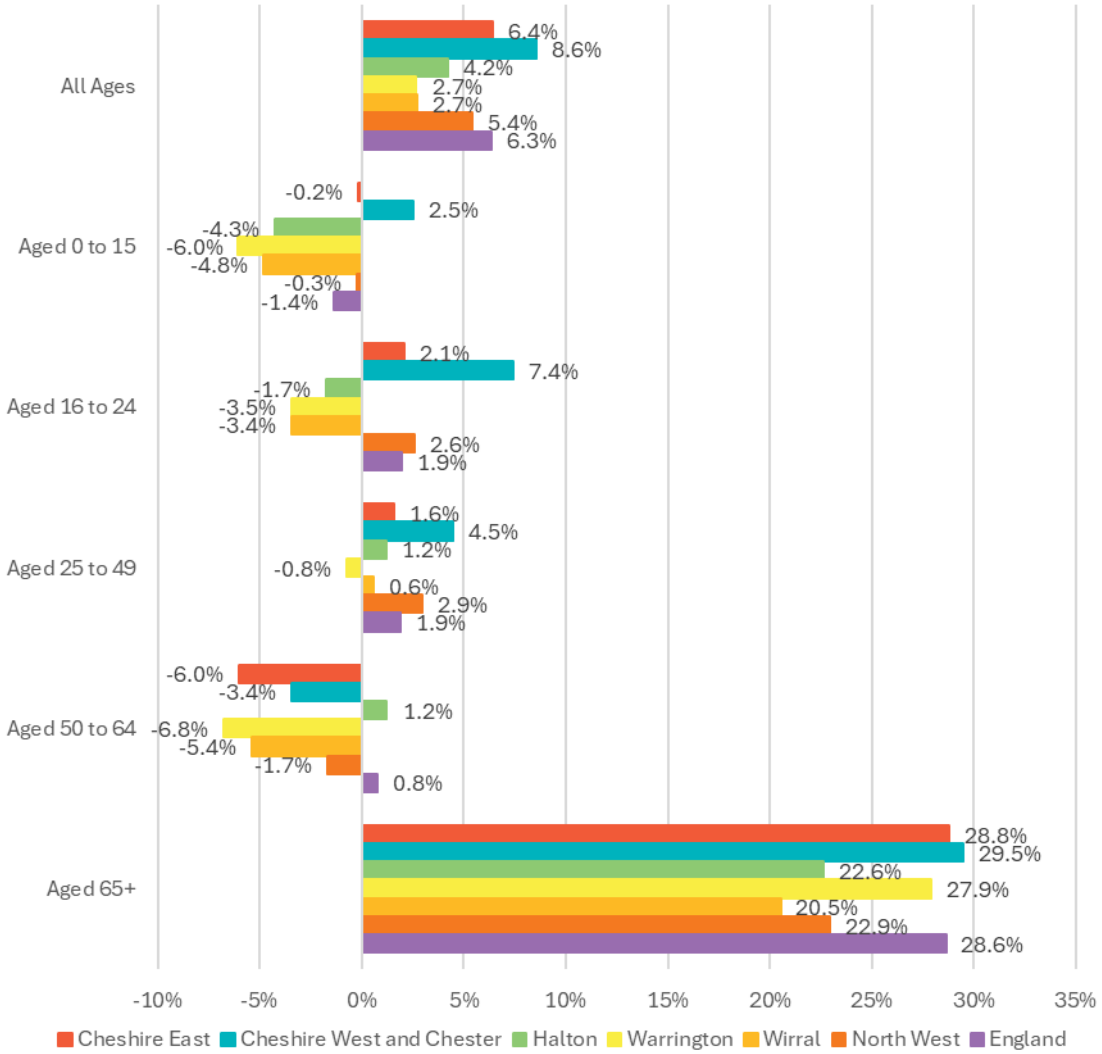
2 The Borough is similarly expected to see a greater increase in the population aged 16 to 24 and 25 to 49 than the comparator areas, with anticipated growth in these cohorts of 7.4% and 4.5% respectively;

3 The population aged 50 to 64 is expected to decline by 3.4%, with declines also projected in the neighbouring authorities and the North West despite a slight increase of 0.8% projected nationally;

4 The population aged 65+ is expected to grow by 29.5% or 24,554 people, the highest level of projected growth across the neighbouring authorities and higher than both the regional and national increases of 22.9% and 28.6% respectively; and

5 This increase will see the share of the Borough's residents aged 65 and over increase from 23.2% in 2025 to 27.7% in 2043, whilst the working age population will decrease from 58.9% of the population to 55.5%.

Figure 2.4 Population Projection by Age Band 2025 - 2043

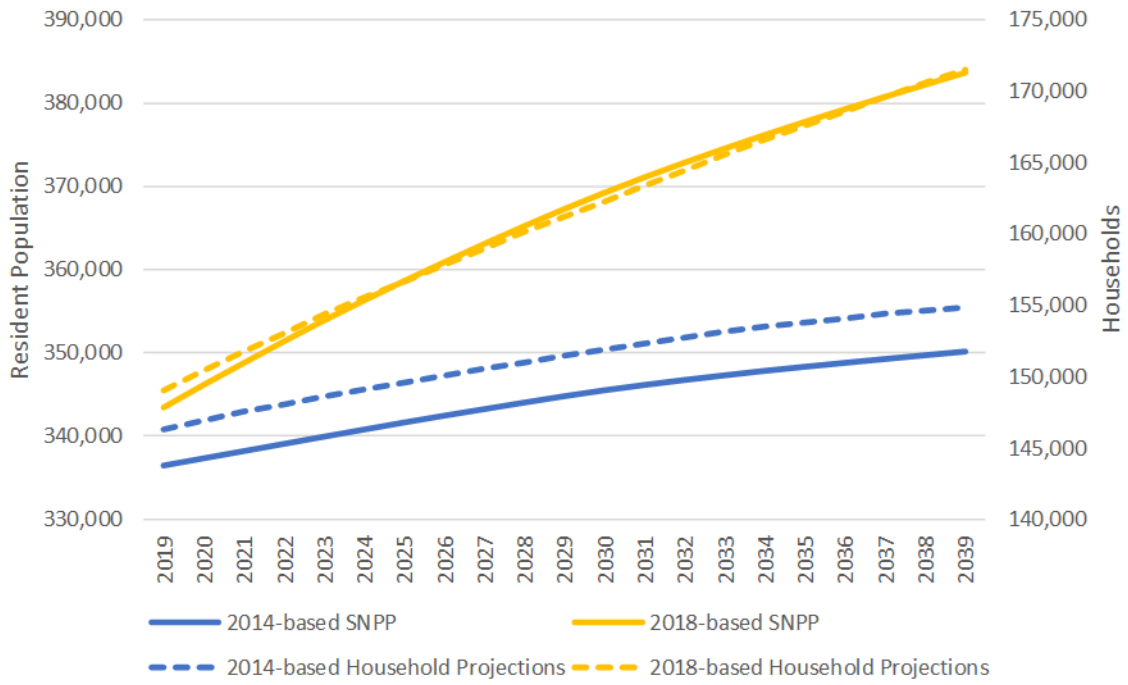


Source: ONS (2024): 2022-Based SNPP

2.55 Figure 2.5 demonstrates the issues faced by CWaC from the latest population projections. The former 2014-based SNPP (and the equivalent SNHP) underpinned the Government's SM2 calculations previous to the introduction of the new stock-based SM3 in December 2024. The Government chose not to revert to the more up to date 2018-based SNPP under the previous Standard Method because this would not be "*consistent with the Government's objective of significantly boosting the supply of homes.*[13]" This may have been the case nationally, where the 2018-based projections are generally significantly lower than the 2014-based SNPP/SNHP, but it is certainly not the case in CWaC.

2.56 The net population growth for CWaC in the 2014-based SNPP is just 13,678 between 2019 and 2039 (the end of the forecasts), with the 2018-based projections almost three times higher with a net growth of 40,198 over the same period. This translates across into the household projections, with the net growth projected in the 2018-based SNHP, of 22,534, significantly higher than the previous 2014-based SNHP (+8,540) over the same time period. This is partly due to the very high levels of housing growth (and associated net in-migration) that have taken place in CWaC since 2014.

Figure 2.5 CWaC's Population Projection 2019 - 2039



Source: ONS (2020): 2018-Based SNPP and SNHP / 2014-based SNPP and SNHP

2.57 The key points to glean from this assessment for CWaC's emerging Local Plan are as follows:

1 Firstly, CWaC's population will **grow at a faster rate** than any of its neighbouring authorities as well as relative to the wider regional and national projected growth rates. This **presents a significant economic opportunity** for the Borough and **a need to ensure that sufficient housing is provided** so that this growth potential is not constrained;

2 The Borough is likely to see an **increased number of families** with children and will need to plan accordingly for larger housing.

[13] PPG Paragraph: 005 Reference ID: 2a-005-20190220

3 Whilst the **ageing population** is an issue to be faced by all areas, **the scale of the issue within CWaC is particularly acute**. This will increase the share of the Borough's population aged 65+ from 23.7% in 2025 to 27.7% by 2043.

4 There is set to be **heightened demand for housing across all sizes and tenures**, with the only age groups forecast to decline in overall numbers being 0-9 year olds (albeit only a marginal fall) and 50-64 year olds. This will necessitate the need to provide for a complex and varied housing market for those looking to move but remain within CWaC.

Labour Market

2.58 The Borough performs well across a range of labour market indicators, with high relative levels of economic activity[14] and low unemployment, highlighting the strong resilience of the local economy and good job security. The local job market is diverse, with key international employers such as MBNA, Encirc, Vauxhall Motors and many others helping to support high levels of employment in highly-paid sectors such as finance, scientific, advanced manufacturing and professional roles.

2.59 The Borough is also a desirable place to live for workers in well-paid jobs in other areas, as evident in the difference between resident and workplace-based earnings. Resident-based median annual earnings within the Borough stood at £39,201, considerably higher than the North West and England and Wales earnings of £35,298 and £37,474 respectively[15]. This indicates that the Borough is a desirable location for living, with a high share of residents commuting to work in other areas such as Manchester, or in some cases over the border into North Wales where Airbus employs a significant workforce.

2.60 This presents an opportunity in the future as revised working patterns post-pandemic stabilise, with a shift away from daily commuting to a hybrid approach of home working and some days in the workplace. This change is driving requirements for larger properties with an extra bedroom capable of being converted into a home office. Overall, the labour market indicators highlight a need for a diverse housing offer that maintains recent strong levels of housebuilding to capitalise on the already strong economic foundations as the Borough navigates its demographic changes, hybrid working and economic recovery.

Housing Market

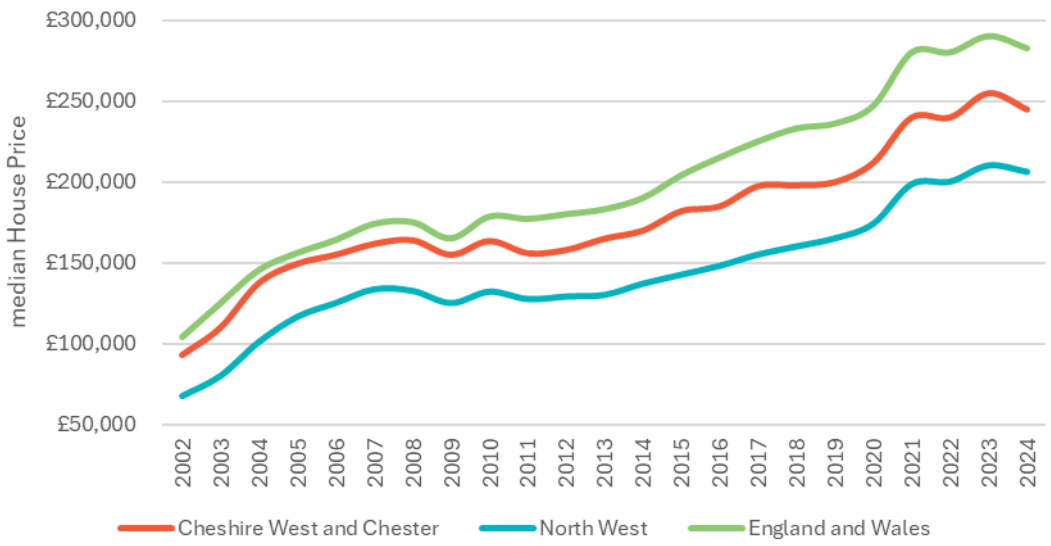
2.61 Cheshire West and Chester has not escaped the symptoms of the housing market crisis with rising house prices and worsening affordability ratios that make it increasingly likely that younger residents have to move out of the Borough to find suitable housing choices.

2.62 House prices have increased by around 86% in CWaC over the last 20 years, and although this rate of change is slightly lower than the increases experienced in England and across the North West, the median house price is now £245,000, well above the regional average of £206,000.

[14] According to the ONS Annual population Survey (2025), in the year to March 2025 there were 206,400 economically active (in or seeking employment) residents between the age of 16-64 within Cheshire West and Chester, accounting for 83.0% of 16-64 year olds in the Borough. This is a greater share than across the North West (76.7%) and England and Wales (78.7%).

[15] ONS (2021): Annual Survey of Hours and Earnings (2024)

Figure 2.6 Median Price Paid Comparison



Source: ONS (2025): House price to residence-based earnings ratio

2.63 This house price increase has taken place alongside housing becoming increasingly unaffordable for many, as demonstrated by a medium workplace-based affordability ratio which has risen by 0.62 in CWaC over the past 20 years to reach 6.25 in 2024. This is higher than the 5.84 ratio across the North West as a whole.

Figure 2.7 Residence-Based Median Affordability Ratio

Source: ONS (2025): House price to residence-based earnings ratio

3.0 Assessing Local Housing Need

Starting Point – Standard Methodology

3.1 The new standard method for calculating local housing need is one of the central tenets of achieving the Governments objective to deliver 1.5 million homes in the current Parliament. The new method is much more ambitious than its predecessor (targeting 372,000 homes per year, up 21% from the previous target of 305,000). The new method aims to boost housing numbers by pinning targets to existing housing stock (rather than household projections, as per the former method) and then uplifting needs, and the target, based on affordability (using a 5-year average). It no longer includes a 35% uplift for urban areas and also does away with the 'cap'.

3.2 At present, the SM3 results in a local housing need figure of **1,928 dpa** for Cheshire West and Chester (considerably higher than the previous SM2 demographic-based figure of 489 dpa, and also much higher than the 2015 Local Plan figure of 1,100 dpa). The SM3 housing need figure has been generated as follows:

- Cheshire West and Chester's housing stock was 166,601 in 2024. The baseline is calculated as 0.8% of stock, therefore the housing stock baseline figure is 1,333 per year.
- The affordability uplift equates to 44.65%, based on a 5-year average median workplace-based affordability ratio of 7.35 between 2020 and 2024, calculated as follows:
  - (i) Average Median local workplace-based affordability ratio[16] (2020-2024) = 7.35
  - (ii) deduct 5 = 2.35
  - (iii) divide by 5 = 0.47
  - (iv) multiply by 0.95 = 0.4465 (or 44.65%).

3.3 Applying the 44.65% uplift to the stock baseline figure of 1,333 per annum equates to 1,928 dpa.

3.4 **The starting point for assessing local housing need in Cheshire West and Chester is therefore 1,928 dpa.**

Consideration of a different figure to the LHN generated by the Standard Method

3.5 The NPPF is clear that to determine the minimum number of homes needed, strategic policies should be informed by an LHN assessment, conducted using the standard method in the PPG. Although the previous NPPF text suggested that 'exceptional circumstances' could justify an alternative approach which also reflected current and future demographic trends and market signals, this has now been removed from the NPPF.

3.6 Instead, alongside meeting any additional needs that cannot be met within neighbouring areas over the plan period, the requirement could be increased if it "*reflects growth ambitions linked to economic development or infrastructure investment*" [paragraph 69].

3.7 Otherwise, an alternative approach may have to be used in the PPG only:

[16] ONS (2025): Ratio of median house price to median gross annual workplace-based earnings by local authority district, England and Wales, 1997 to 2024

"*Where strategic policy-making authorities do not align with local authority boundaries (either individually or in combination), or the data required for the model are not available such as in National Parks and the Broads Authority, or local authority areas where the samples are too small*"[17].

3.8 This is not the case for Cheshire West and Chester.

3.9 The PPG states that calculating housing need is a separate process from establishing a housing requirement figure, which factors in policy considerations and constraints[18].

3.10 However, the latest version of the NPPF is quite clear that when planning for housing and employment land, the approach should be an integrated one:

"*Planning policies should* (inter alia):

c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment" [paragraph 86d]

3.11 This is re-iterated later in the document:

"To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should (inter alia)*:*

e) ensure an integrated approach to considering the location of housing, economic uses and community facilities and services." [paragraph 98e]

3.12 The remainder of this paper addresses these elements to assess whether the 1,928 dpa figure adequately supports the Council's growth ambitions linked to economic development and whether this could justify uplifting the LHN figure generated by the standard method, as well as exploring the potential demographic, socioeconomic and housing market implications of a reduced housing requirement.

Demographic-led Needs

Household Projections

3.13 As set out above, the 2018-based projections have resulted in considerable upward revisions compared to the 2014-based projections.

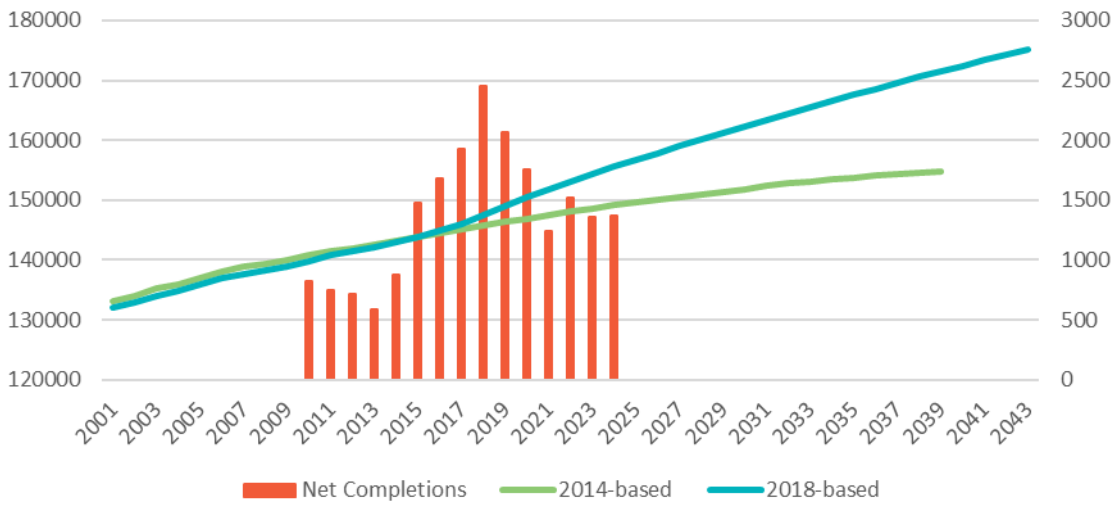
3.14 Between 2025 and 2039 (when the 2014-based projections end), the 2014-based projections suggested an increase of 5,254 households or 375 per year, compared with a projected increase of 14,839 households or 1,060 per year in the 2018-based projections. This is driven by a combination of significantly higher population growth, change in age-cohorts and changes in household formation.

[17] PPG: 2a-014-20241212

[18] "*When preparing strategic policies, it may be concluded that insufficient sites / broad locations have been identified to meet objectively assessed needs, including the identified local housing need. In the first instance, strategic policy-making authorities will need to revisit their assessment...If insufficient land remains, then it will be necessary to investigate how this shortfall can best be planned for. If there is clear evidence that strategic policies cannot meet the needs of the area, factoring in the constraints, it will be important to establish how needs might be met in adjoining areas through the process of preparing statements of common ground, and in accordance with the duty to cooperate. If following this, needs cannot be met then the plan-making authority will have to demonstrate the reasons why as part of the plan examination*". PPG ID: 3-025-20190722

3.15 Figure 3.1 highlights the impact that net housing completions have had on household growth projections in CWaC, and particularly the stark difference between the 2014 and 2018-based projections.

Figure 3.1 Household growth projections and net completions for CWaC Borough

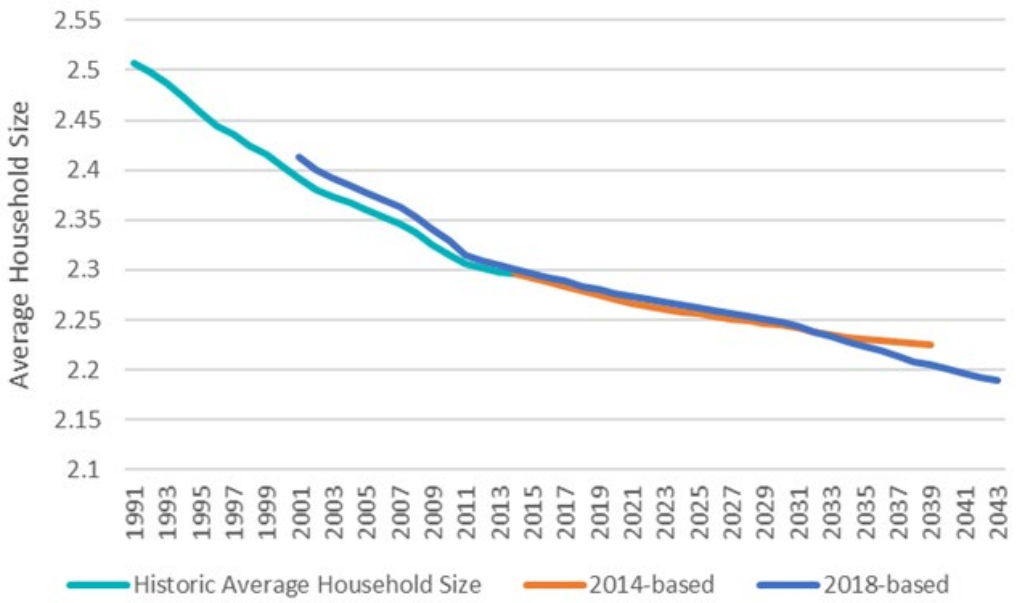


Source: CLG 2014/ONS 2018 Household Projections/MHCLG Table 122

Household Formation

3.16 Figure 3.1 shows how CWaC's average household size has declined historically, and how the most recent Government projections (2018-based) and the 2014-based household projections project this longstanding trend to continue. It highlights that there has been a steady decline in average household size, with the 2018-based projections showing a continuing decline in average household size.

Figure 3.2 Average household size comparison for CWaC Borough



Source: MHCLG/ONS Household Projections

3.17 Given there are historically strong levels of housebuilding in the Borough (particularly during 2017-2020) which increased the level of inward migration to CWaC, well above levels that were envisaged by the 2014-based SNPP, there is a very strong argument that without returning house building to these levels, and indeed going beyond those levels to the 1,928 dpa suggested by SM3, there is every likelihood that the Borough will continue to become increasingly unaffordable for its own residents to live in. In tandem, we will see a pronounced ageing of the overall population and concurrent reduction in the available labour force which could lead to increased levels of unsustainable in-commuting.

Economic Growth Strategies / Strategic Infrastructure Improvements

3.18 The NPPF at paragraph 86d states that planning policies should *"seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment"*. This retains the link between integrating economic growth and housing need. There is a clear risk that where the labour force supply is less than the projected job growth, this could result in unsustainable commuting patterns and reduce the resilience of local businesses, resulting in a barrier to investment.

3.19 Ensuring a sufficient supply of homes within easy access of employment opportunities represents a central facet of an efficiently functioning economy and can help to minimise housing market pressures and unsustainable levels of commuting (and by association, congestion and carbon emissions). If the objective of employment growth is to be realised, then it will generally need to be supported by an adequate supply of suitable housing. The challenge of meeting employment needs is clearly given great importance, and the NPPF highlights this by stating that *"significant weight should be placed on the need to support economic growth and productivity"* [para 85].

3.20 In this context, it is an important part of responding to both the NPPF and the PPG that CWaC's new local plan should consider the extent to which the SM3 figure of 1,928 dpa is consistent with the economic success of the Borough and the wider LEP area.

3.21 The Cheshire and Warrington Local Enterprise Partnership [LEP] celebrates the fact that the Cheshire and Warrington sub-region is the best performing economy in the North of England and one of the most successful and fastest-growing economies in the country.

3.22 The LEP's Strategic Economic Plan [SEP] sets out the growth ambitions for the sub-region, including:

1 growing the economy to at least £50m of GVA per annum;

2 boosting productivity per resident to 20% above the UK average; building economic resilience;

3 building vibrant town centres; and

4 creating a balanced housing market.

3.23 At the forefront of the LEP's aims is a clear ambition to significantly strengthen what is an already well functioning and successful economic sub-region. This will be supported by the potential opportunities arising from Northern Powerhouse Rail, or the HyNet North West hydrogen and carbon capture storage project, for example, which will help transform the North West region into the world's first low carbon industrial cluster and support 75,000 jobs across the country by 2035.

3.24 As set out in the SEP, housing is going to be a key component which underpins these economic growth aspirations. It is critical that the right numbers, type and quality of housing in the right locations and at affordable price points are provided in order to ensure CWaC's future prosperity. Delivering a functioning and balanced housing market in CWaC is vital to create the conditions to support economic growth in the sub-region.

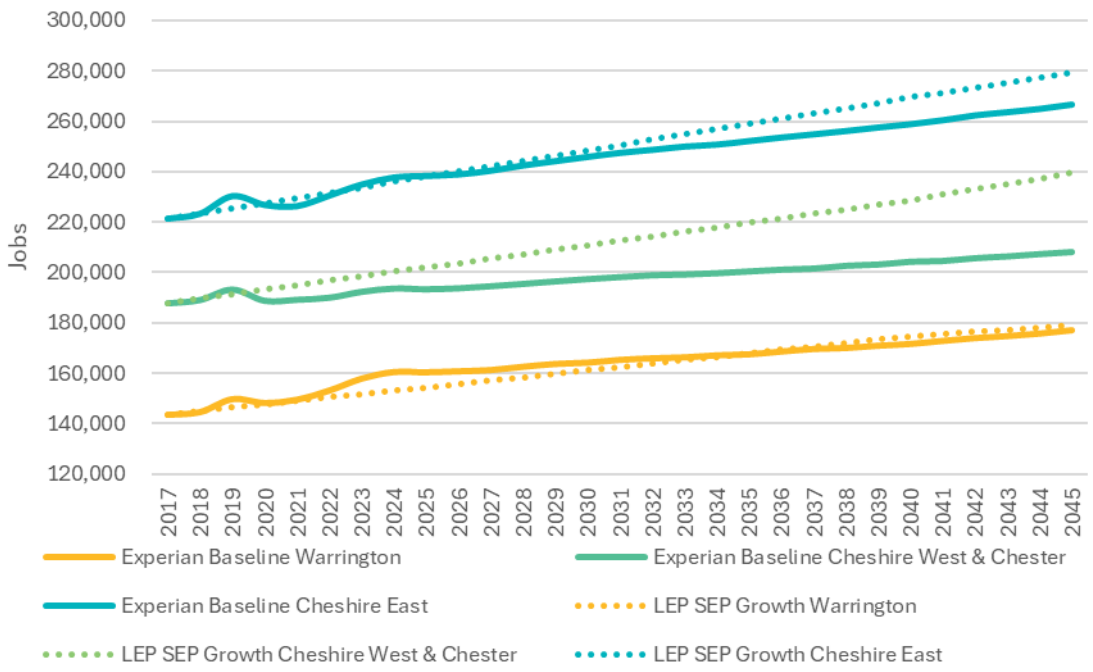
3.25 The SEP includes an aspiration to deliver 120,000 net additional jobs across CWaC, Cheshire East and Warrington by 2040. Although there is no target specifically set for CWaC, there is an expected jobs growth for Warrington and if it is assumed the balance of jobs between CWaC and Cheshire East remains as it is currently, CWaC's economy would need to grow by c.40,766 jobs over the period 2024 to 2040 to align with this aspiration.

3.26 This economic scenario is considered alongside a more pessimistic Experian economic forecast which anticipates a growth of 10,500 jobs over the period 2024 to 2040. This is a policy-off economic forecast which is considered modest in the context of past trends in CWaC where jobs growth increased by 13,200 in the decade between 2014 and 2024.

3.27 Figure 3.3 plots the Experian baseline job growth forecast and the trajectory each member of the LEP needs to aim for in order to hit the LEP SEP target by 2040. It shows that Warrington has actually overshot the SEP growth trajectory since 2017, adding 16,900 jobs in this period, with 14,100 left to add by 2040 for its target to be reached. Cheshire East has also out performed the growth trajectory to 2024, adding 16,400 jobs to 2024 against a target of 14,680.

3.28 On the other hand, **CWaC is lagging behind its neighbours**, adding only 5,800 jobs between 2017 and 2024 against a target for this period of around 12,400, meaning that the Borough needs to add a further c.34,970 jobs before 2040 if its fair share contribution of meeting the LEP SEP target is to be achieved.

Figure 3.3 Experian baseline and LEP SEP job growth



Source: Experian (June 2025), LEP SEP (2017)

3.29 A significant number of new homes would therefore need to be delivered in CWaC in order to support the LEP's economic ambition and provide enough workers to fill the new jobs created by projects such as the Cheshire Science Corridor Enterprise Zone – this has the potential to attract in the order of 20,000 jobs and 500 businesses to Cheshire and Warrington through a significantly enhanced profile; attractive business incentives and the ability to retain and reinvest new business rate revenue. In CWaC, this includes sites at Ellesmere Port, Thornton Science Park and Protos.

Previous levels of housing delivery

3.30 Whilst CWaC is certainly not immune from the national housing crisis, in recent years the Borough has performed well in terms of housing delivery. Since the adoption of its Local Plan in January 2015, the availability of a large volume of allocated housing sites in the pipeline has helped to boost housing development, with almost 17,000 homes constructed over the past 10 years against a target of 11,000. This highlights the strength of the local market and the demand for new homes in CWaC, and the ability for the market to deliver them via a plan-led approach to strategic planning.

Table 3.1 Net Additional Dwellings in CWaC 2014/5 – 2023/24

	Net Additional Dwellings	Local Plan Target	Difference
2014/15	1,481	1,100	+381
2015/16	1,679	1,100	+579
2016/17	1,930	1,100	+830
2017/18	2,456	1,100	+1,356

2018/19	2,064	1,100	+964
2019/20	1,759	1,100	+659
2020/21	1,245	1,100	+145
2021/22	1,519	1,100	+419
2022/23	1,355	1,100	+255
2023/24	1,370	1,100	+270
Total	16,857	11,000	+5,857

Source: MHCLG (2024): Live tables on housing supply: net additional dwellings Table 122

3.31 Similarly, the latest Housing Delivery Test results were published in December 2024 and are replicated in Table 2.2 below. It highlights that a greater number of homes have been delivered in CWaC compared to that identified by the requirements; by c. 1,418 homes over the identified requirement (based on the lower household projections rather than the Local Plan target given the age of the Plan). This results in a HDT measurement of 275% for 2023 in CWaC.

Table 3.2 CWaC Housing Delivery Test 2023 Results

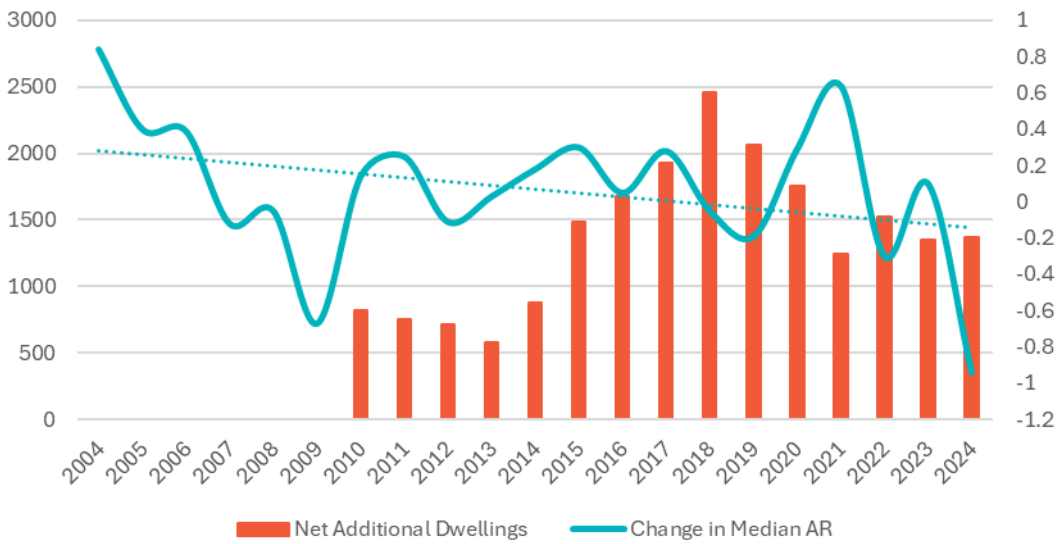
	2020-21	2021-22	2022-23
Number of homes required	389	579	560
Number of homes delivered	1281	1530	1399
Housing Delivery Test Measurements	+892	+951	+839

Source: MHCLG (December 2024): Housing Delivery Test 2023 Measurement

3.32 Interestingly, there seems to be some **evidence that the high level of housing delivery in CWaC since 2015 is starting to slow down the growth in house prices and affordability ratios**. As can be seen in Figure 3.4, the annual change in the affordability ratio has been on a downward trend, with the biggest falls coming in the years following the peak of CWaC's recent delivery of 2,456 dpa in 2017/18. Indeed, in 2024 the affordability ratio had fallen back to 6.25, which is lower than even the years preceding the 2008 financial crisis.

3.33 Although the situation is clearly very complex, it is unlikely to be a complete coincidence that CWaC's affordability ratio fell by 0.12 since 2015, whilst neighbouring authorities' ratios have worsened considerably – Warrington's increased by 0.61 and Cheshire East's by 0.57 respectively.

Figure 3.4 Housing Delivery and Affordability



Source: MHCLG (2025) Table 122/ ONS (2025): House price to residence-based earnings ratio

Updated Assessment of Local Housing Need

3.34 In order to understand the level of future housing which would support the future growth aspirations of CWaC, Lichfields has carried out an independent assessment of the LHN for CWaC using the most recently available data, including the 2022-based SNPP, 2018-based SNHP and job growth projections from Experian (June 2025). Given 2022-based household projections are not yet available, all scenarios use assumptions around household headship rates and persons who do not live in households taken from the 2018-based SNHP which have been updated to reflect the 2021 Census.

3.35 Lichfields has modelled these scenarios and considered future housing need over the period 2024 to 2042, to align with the likely plan period of CWaC's emerging Local Plan. The scenarios modelled include:

- Demographic-led:
  - A: 2022-based SNPP Demographic Baseline
  - B: Mid-Year Estimates [MYEs]– as above but utilising the most up-to-date MYE data for 2023
- Jobs-led:
  - C: Experian forecast from June 2025
  - D: LEP/SEP economic growth ambition
- Housing-led:
  - E: SM3 (1,928 dpa)
  - F: Adopted Local Plan target (1,100 dpa)
  - G: Past delivery since Local Plan adoption (1,686 dpa)

3.36 A summary of the scenarios is shown in Table 3.3. All of the scenarios modelled show an increase in population, ranging from 20,931 under the Local Plan target scenario, to 59,826 under the Economic Growth scenario.

Table 3.3 Summary of Modelling Scenarios

	A: SNPP	B: MYE	C: Experian Baseline	D: Econ Growth	E: SM3	F: Local Plan	G: Past Delivery
Population 2024	369,819	368,900	371,918	368,562	368,900	368,900	368,900
Population 2042	414,295	413,470	393,279	428,388	419,661	389,831	410,945
Difference	44,477	44,570	21,361	59,826	50,761	20,931	42,046
p.a	2,471	2,476	1,187	3,324	2,820	1,163	2,336
Households 2024	162,113	161,473	162,538	161,354	161,473	161,473	161,473
Households 2042	193,030	192,338	182,681	199,320	195,220	180,727	190,984
Difference	30,917	30,865	20,143	37,966	33,747	19,254	29,511
p.a	1,718	1,715	1,119	2,109	1,875	1,070	1,640
Homes 2024	166,708	166,050	167,146	165,928	166,050	166,050	166,050
Homes 2042	198,502	197,791	187,859	204,970	200,754	185,850	196,398
Difference	31,794	31,740	20,714	39,043	34,704	19,800	30,348
p.a	**1,766**	**1,763**	**1,151**	**2,169**	**1,928**	**1,100**	**1,686**
Workers 2024	175,093	174,278	176,100	174,074	174,278	174,278	174,278
Workers 2042	200,895	200,089	186,828	209,837	204,127	184,562	198,410
Difference	25,803	25,811	10,728	35,763	29,849	10,284	24,132
p.a	1,433	1,434	596	1,987	1,658	571	1,341
Jobs 2024	192,592	191,696	193,700	191,471	191,696	191,696	191,696
Jobs 2042	220,974	220,086	205,500	230,808	224,528	203,008	218,240
Difference	28,382	28,391	11,800	39,337	32,832	11,312	26,544
p.a	1,577	1,577	656	2,185	1,824	628	1,475

Source: Lichfields/Popgroup

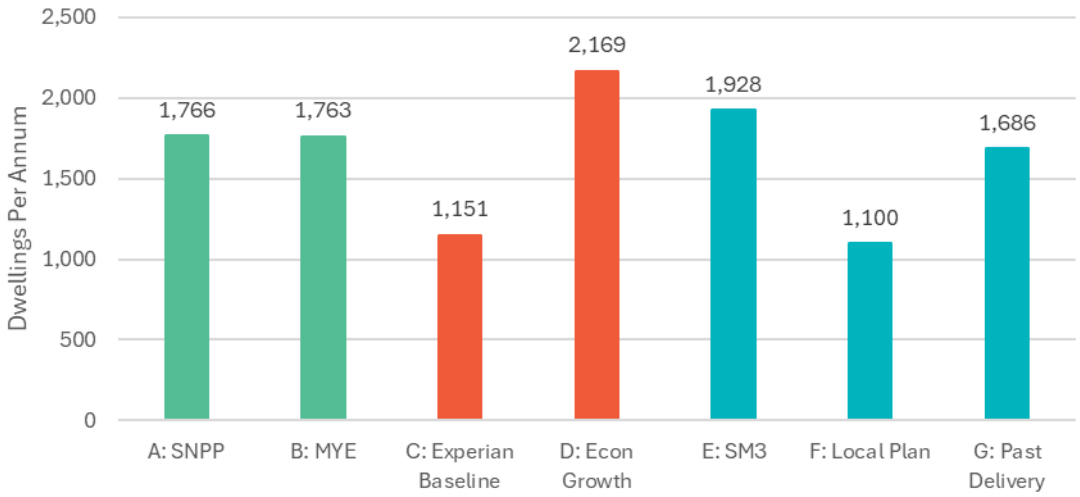
3.37 The Experian forecast (June 2025) indicates a jobs growth of c.11,800 jobs between 2024 and 2042 – generating a requirement for 1,151 dpa. It should be noted that the Experian economic forecast is considered pessimistic. This level of jobs growth is significantly lower than past trends in jobs growth and does not reflect the economic growth which took place over the 10 year period between 2014 and 2024 where CWaC experienced a jobs growth of 13,200 in the decade.

3.38 An assessment of the likely future scale of job growth has been made using Experian forecasts alongside the aspirations within the SEP. Planning for the LEP jobs growth ambitions would generate a requirement for 2,169 dpa – a scenario requiring a level of housing delivery higher than the SM3 figure. This scenario would result in a considerable growth in the labour force (35,763) which would support the projected economic jobs growth of 39,337 jobs over the plan period.

3.39 As shown in Figure 3.5, all scenarios modelled result in a housing requirement above the adopted CWaC 2015 Local Plan target of 1,100 dpa, even the pessimistic Experian Baseline scenario. The demographic-led scenarios produce housing requirements of between 1,763

and 1,766 dpa which is a level of delivery that would purely sustain the current and projected demographic shift towards on older population and a reduction in the available workforce – these scenarios are slightly higher, albeit closely reflecting, the past delivery rates which demonstrates how feasible they are to achieve. The highest requirement of 2,169 dpa results from the Economic Growth scenario, representing the level of delivery required to support the growth in the workforce necessitated by the growth ambitions set out within the SEP.

Figure 3.5 Summary of dpa figures resulting from modelling scenarios



Source: Lichfields/Popgroup

3.40 In light of our analysis, it is clear that for CWaC to achieve its economic potential, to deliver the homes it is expected to by Government, whilst at the same time addressing challenges of affordability and choice, the SM3 figure should be treated as a minimum. In fact, we would advocate targeting a higher housing annual number, linked to the economic potential of the Borough and the many direct and indirect benefits that could flow from this. The high levels of past delivery show what the market can achieve in partnership with CWaC and other stakeholders. The Consortium stand ready to work towards delivering the new housing the Borough needs now, and in future years, and supports an aspirational new local plan that seeks to deliver high levels of economic growth supported by high quality homes for its residents.

4.0 Impact of Reducing the Housing Requirement

Economic Benefits

4.1 Utilising Lichfields' eVALUATE economic benefits methodology, the potential economic benefits of four housing requirement scenarios are set out in Table 4.1. Achieving 1,928 dpa in line with the SM3 requirement would deliver significant economic benefits to the Borough, including supporting over 5,000 direct FTE construction jobs, over 5,700 FTE supply chain jobs, over £947 million in GVA, over £48 million in resident expenditure and £4.9 million in Council Tax revenue in each year of the plan period.

Table 4.1 Direct and Indirect Economic Benefits of CWaC's Housing Requirement Targets

	Adopted Requirement – 1,100 dpa	Past Delivery - 1,686 dpa	SM3 – 1,928 dpa	Economic Growth – 2,169 dpa
Market Housing	770	1,180	1,350	1,518
Affordable Housing (at 30%)	330	506	578	651
Total	1,100	1,686	1,928	2,169
Construction Benefits				
Construction Cost	£194.3m	£297.8m	£340.5m	£383.1m
Direct FTE p.a.	2,855	4,380	5,005	5,630
Direct GVA p.a	£236.0m	£361.7m	£413.6m	£465.3m
Indirect FTE p.a.	3,285	5,035	5,760	6,475
Indirect GVA p.a.	£304.4m	£466.5m	£533.5m	£600.2m
Total FTE p.a.	**6,140**	**9,413**	**10,765**	**12,110**
Total GVA p.a.	**£540.3m**	**£828.2m**	**£947.1m**	**£1.07bn**
Operational Benefits				
First Occupation Expenditure	£6.1m	£9.3m	£10.6m	£11.9m
Jobs Supported	35	55	60	70
Ongoing Resident Expenditure p.a.	£27.5m	£42.2m	£48.2m	£54.2m
Net Additional Resident Expenditure p.a.	£12.6m	£19.3m	£22.0m	£24.8m
Ongoing Jobs Supported p.a.	130	200	230	260
Council Tax p.a.	£2.3m	£3.8m	£4.3m	£4.9m

Source: Lichfields Analysis

4.2 If the housing requirement were to be reduced from the SM3 target of 1,928 dpa to the average past delivery figure of 1,686 dpa, we might expect to see a reduction of 1,352 construction jobs per year; £118.9 million in direct/indirect construction GVA per year; £2.7 million of resident expenditure annually; and, a loss of £500,000 in annual council tax revenues.

4.3 Similarly, achieving the level of housing delivery required under the economic growth scenario would see an increase in these impacts over and above the SM3 figure in the region of 1,345 construction jobs per year; £122.9 million in direct/indirect construction GVA per

year; £2.8 million of resident expenditure annually; and, an increase of £600,000 in annual council tax revenues.

Health and Wellbeing Benefits of New Housing

4.4 This section of the reports seeks to set out the social and health benefits of new housing and how it can have a positive effect on general well-being.

4.5 CWaC's Regulation 18 Local Plan Issues and Options consultation sets out a vision which includes promoting wellbeing by enabling all to enjoy a safe and healthy lifestyle with a good quality of life. It goes on to recount the existing Local Plan objectives and whether these should be carried forward – these include promoting mixed and balanced communities through the provision of a range of housing to meet market affordable and specialist needs. Fuel poverty is a concern noted throughout the Borough, something that new energy efficient housing can help to alleviate through the Future Homes Standard.

4.6 It has long been accepted that there is a direct link between housing and health. The Healthy Urban Development Unit identify decent and adequate housing as being critically important to health and wellbeing and the NPPF highlights the importance of ensuring safe and healthy living conditions.

4.7 It is estimated that in 2023, up to 3.8 million homes in England failed to meet the Decent Homes Standard and, whilst this figure has fallen over recent years, it still amounts to approximately 15% of homes in the country. The situation is particularly acute in the private rented sector, where 21-22% of homes do not meet the Standard. As such, poor quality housing is a challenge faced by a huge number of families in England, including within CWaC.

4.8 Poor housing also has significant economic impacts. Research by the Building Research Establishment in 2023 estimates that treating patients with housing related hazards caused by poor conditions costs the NHS over £1 billion a year (cold, damp, mold and falls for example). Yet, despite its far-reaching impacts, the issue of poor-quality housing and housing inequality does not receive the attention it deserves. Consortium members recognise the importance of providing new homes that will help address these costs through high quality, sustainable new homes, for example by providing compliant Building Regulations Part M design standards, including adaptable and accessible homes.

4.9 The provision of new housing generates many other benefits – creating sustainable, mixed and balanced communities, expanding the opportunity for home ownership and reducing reliance on the private rented sector and potential insecurity of tenure that results, reducing hidden homelessness, mitigating affordability risks, and creating churn in the market to free up smaller properties for first time buyers and larger properties for families to occupy as elderly transition to retirement villages and care.

4.10 Larger housing schemes can more ably deliver the social and physical infrastructure needed to mitigate adverse impacts resulting from population increases. They allow the creation of sustainable communities with homes built to high environmental standards, across a wide range of types, size and tenures, and they can create cohesive well-planned neighbourhoods with open space, recreational facilities set within attractive and sensitively designed environments, as well as community infrastructure such as GP surgeries, dental surgeries, shops, cafes, hairdressers and a variety of other related services.

Crisis of Supply

4.11 The Governments standard method puts the number of new homes needed in England at c.370,000 per year. In 2023/24, Government data shows the total housing stock in England increased by around 221,000 homes. The last time annual increases exceeded 250,000 was 1987. The challenge to deliver the required number of homes is therefore unprecedented in modern times.

4.12 The delivery of affordable housing has also fallen significantly short for a prolonged period. As of February 2025, over 1.3m households were on the waiting list for social housing in England, a figure that has increased 10% in the past 2 years (MHCLG, February 2025). There are 123,000 households in temporary accommodation (including 160,000 children) at an annual cost to the Government of approximately £2bn. The average annual affordable housing delivery in England over the past 10 years has been just over 54,000.

4.13 Housing need manifests itself in a variety of ways, such as increased levels of overcrowding, acute affordability issues, more young people living with their parents for longer periods, and increased levels of homelessness[19]. A lack of affordable housing may also negatively impact lower income families by reducing the amount they can spend addressing other health and wellbeing needs.

4.14 CWaC has performed well in recent years and has delivered high levels of housing which has started to reverse some of the worst extremes of affordability. Government data shows that over the 10 year period between 2013/14 and 2023/24, a total of 5,291 affordable dwellings have been completed, which represents 48% of the overall housing delivery target included in CWAC Local Plan Part One.

4.15 However, it must be ensured that this level of delivery can be maintained by planning for the right number of homes over the upcoming plan period, to help continue to address the issues associated with poor housing affordability. This is also particularly important in the context of recent demographic changes within the Borough and an increased need for homes for first time buyers, families and the ageing population.

Impact of Poor Housing Affordability

4.16 The effects of poor housing affordability are both direct (causing stress and anxiety, for example) and indirect – particularly through reducing the disposable income that people have available to spend on other things which may promote good health (such as quality food and exercise). Affordability problems can also contribute to overcrowding, as households seek to share the fixed costs of accommodation across more individuals.

4.17 Adequate and appropriate housing may be unaffordable because rents or mortgages are high or because of high running costs associated with maintenance, energy, water and drainage and local taxes; or both. These issues can arise in all tenures, but private tenants pay the highest proportion of their household incomes on housing costs.

4.18 The crisis in affordable housing delivery has also driven people into poor quality homes. In England, around 23% of homes in the private rented sector fail to meet statutory minimum standards, which include being in a reasonable state of repair, with modern facilities and services and a reasonable degree of thermal warmth[20]. Research from the Resolution Foundation found that those in the rental sector are more likely to report issues such as

[19] House of Commons Library - Tackling the under-supply of housing in England (January 2021)
[20] House of Commons Library (2022): Housing conditions in the private rented sector (England)

their home being in a poor state of repair, heating/plumbing/electrical issues, and damp than those who own their own home or have a mortgage[21]. They are also much more likely to be worried about their housing costs.

4.19 The broader negative impacts of high housing costs are significant. The provision of sub-market housing has the greatest impact on reducing poverty after housing costs[22], and high rents lead to overcrowding, higher reliance on borrowing and constraints when purchasing essentials, such as food and clothing[23]. Struggling to meet housing costs can also lead to rent or mortgage arrears, which can lead to eviction or repossession.

4.20 These issues are compounded by a limited supply of good quality affordable housing. Conversely, provision of affordable housing as part of a mix of tenures helps to create mixed and balanced communities. Investment in affordable housing has significant benefits which include:

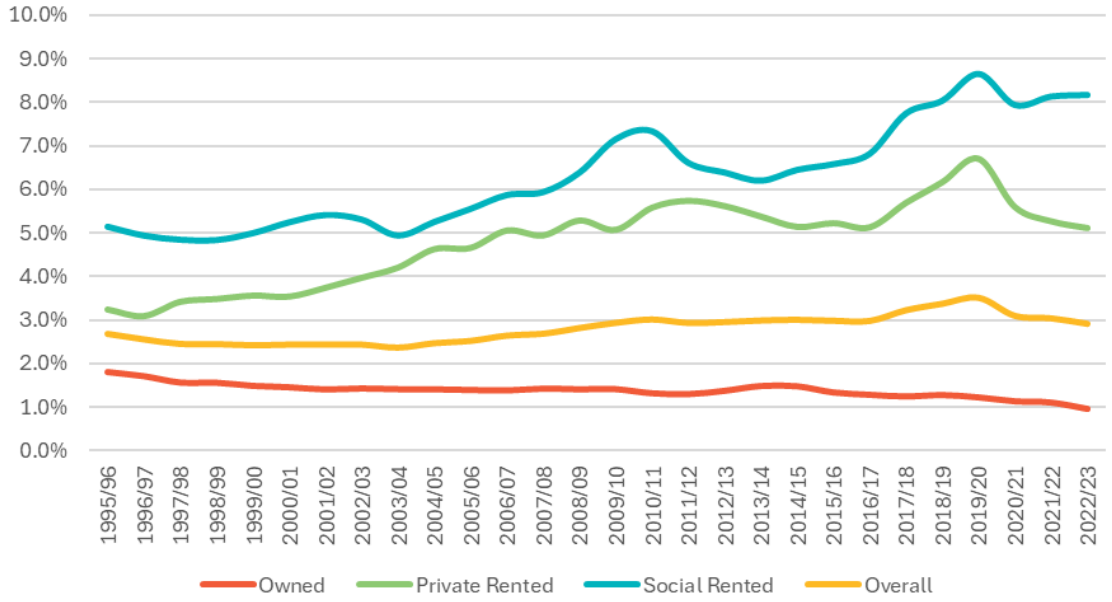
1. Promoting inclusive growth by creating jobs, increasing GVA and providing large multiplier effects;
2. Increasing the supply of affordable housing helps to tackle inequalities by reducing child poverty and homelessness and by providing inclusive, sustainable housing options;
3. Homes transferred to affordable housing providers can support the delivery of affordable and good quality homes which can improve health and wellbeing, contribute to successful placemaking and strengthen community resilience, (including rural community resilience)[24].

Overcrowding and Homelessness

4.21 Overcrowding - defined as when the number of occupants of a home exceed the space they could reasonably be expected to inhabit - is another measure of housing condition and is often associated with affordability. As shown in Figure 4.1 overcrowding in England has become a more widespread problem in recent years, with large increases in overcrowding in private rented and particularly social rented tenures.

[21] Resolution Foundation (2023), Trying Times: How people living in poor quality housing have fared during the cost of living crisis
[22] Tunstall R, Bevan M, Bradshaw J, Croucher K, Duffy S, Hunter C, Jones A, Wallace A and Wilcox S (2013). The links between housing and poverty: An evidence review
[23] Pennington J, Ben-Galim D and Cooke G (2012) No place to call home: The social impacts of housing undersupply on young people
[24] The Impact of Social Housing: Economic, Social, Health and Wellbeing - UK Collaborative Centre for Housing Evidence (CaCHE) and Housing Associations' Charitable Trust (HACT) (August 2020)

Figure 4.1 Overcrowding in Rented Tenures in England

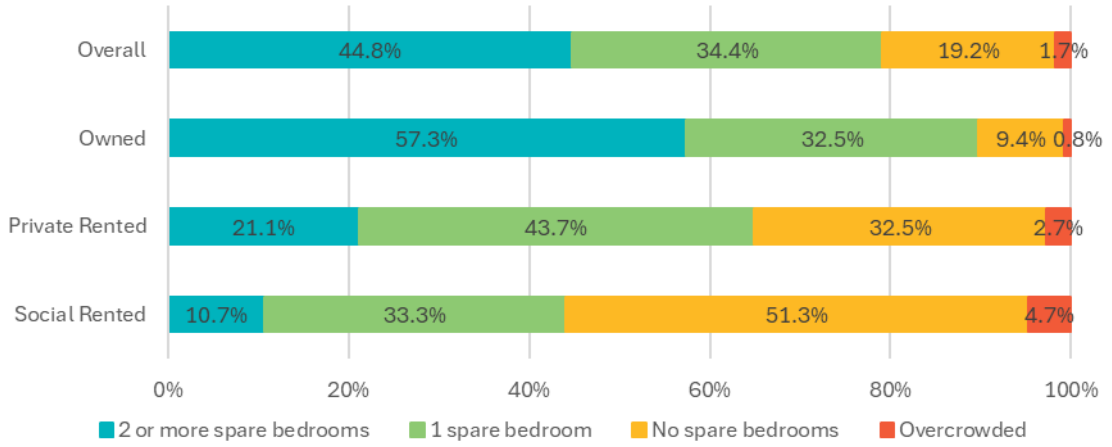


Source: MHCLG, English Housing Survey 2023

4.22 Overcrowding remains highest in the social rented sector (8.2% in 2022/23) but has increased strikingly in private renting (from 3.2% in 1995/96 to 5.1% in 2022/23). As private renting has expanded and housed more of the poorest households, so overcrowding has become a greater problem within the tenure.

4.23 As shown in Figure 4.2, overcrowding remains a clear issue in CWaC, with 2.7% of private rented accommodation and 4.7% of social rented housing households living in overcrowded conditions.

Figure 4.2 Statistics on Overcrowding in CWaC



Source: Census (2021): Tenure by occupancy rating (bedrooms)

4.24 Housing has a significant influence on mental health and wellbeing - children living in crowded homes are more likely be stressed, anxious and depressed, have poorer physical health, and attain less well at school. Distress is generally higher for overcrowded households, and data from the Covid-19 pandemic period seem to show this intensifying

during the more severe lockdown in April 2020, when 39% of people in overcrowded households were indicating psychological distress.

4.25 The factors relating to issues of homelessness within the population are highly complex, though it is recognised that a shortage of good quality affordable housing and the high costs associated with private renting can lead to issues of homelessness[25].

4.26 Homelessness is an issue which is present in CWaC, with 476 households assessed as being owed prevention or relief duty in the year to March 2025[26]. The CWaC Housing Strategy 2025-2035 consultation states that all forms of homelessness have increased in CWaC over the last five years. It reports that the number of households in temporary accommodation has increased significantly since January 2019, peaking recently in January 2024. Of the 226 households in temporary accommodation, 178 (79%) were in hotel accommodation, generating significant costs for the Council. At the heart of the problem is an overall lack of affordable housing, and CWaC must seek to maintain its high levels of affordable housing delivery to help ensure that this level of homelessness can be reduced.

Provision of Affordable Housing

4.27 According to the CWaC Housing Strategy 2025-2035 consultation[27], as of 31 March 2024 there were 6,735 households registered on the housing waiting list. This number is broken down into bands, as follows:

- Band A (urgent housing need): 240 households
- Band B (high housing need): 1,589 households
- Housing Options Band (HOB; no statutory preference): 4,906 households

4.28 As previously set out in Table 4.1, achieving the SM3 target of 1,928 dpa would infer the delivery of 578 affordable dwellings each year (i.e. 30%, as per adopted Local Plan Policy SOC 1), which could potentially provide accommodation to just 8.1% of households on the housing waiting list. Under the current adopted Local Plan target of 1,100 dpa this would fall to 330 affordable homes per year, or alternatively, a much higher 651 affordable homes per year if the level of housing delivery required to support the LEP's economic growth ambitions is realised.

4.29 The 2013 CWaC Strategic Housing Market Assessment [SHMA] demonstrated a need for 714 affordable dwellings per annum. Data on additional affordable housing delivery shows that around 5,291 additional affordable homes have been delivered in the Borough between 2013/14 and 2023/24 at an average of 481 per annum[28], implying under delivery of around 2,563 units against the SHMA target. Clearly, the need for affordable housing is another reason why the SM3 target of 1,928 dpa should be viewed as a minimum.

[25] https://www.crisis.org.uk/ending-homelessness/housing/
[26] MHCLG (2025): Live tables on homelessness
[27] https://participatenow.cheshirewestandchester.gov.uk/housing-strategy-consultation-data-snapshots?
[28] MHCLG (2025), Live tables on affordable housing supply Table 1008c

5.0 Conclusion

5.1 The purpose of this Research Paper is to help inform the Council's early decision making on its overall spatial planning strategy for its new local plan, particularly with regards to the scale of housing required in the Borough to meet its overarching needs, as well as economic and social objectives.

5.2 Significant changes have occurred politically and economically over the past 12 months, with a newfound focus from the Government on boosting housing delivery and addressing the housing crisis, principally through changes to the planning system and the move to a new stock-based Standard Methodology for determining Local Housing Needs.

5.3 The Consortium, comprising Barratt / David Wilson Homes, Redrow Homes and Taylor Wimpey, is eager to see a new Local Plan that is positively prepared and aspirational. It is vital that CWaC seizes the opportunity to review its Local Plan at this time to ensure it can respond to the acute housing and affordability crisis, the recent and future projected changes in the economy, and as a minimum, plan for the levels of housing across the area expected by Government, or indeed going beyond that level where justifiable to further the economic prospects of the Borough and life chances of its residents.

5.4 The Borough faces a number of challenges, including a rapidly growing and aging population which will see the proportion of working-age residents shrink and a greater share of residents above retirement age if current demographic trends continue. CWaC's population will grow at a faster rate than any of its neighbouring authorities as well as relative to the wider regional and national projected growth rates. This presents a significant economic opportunity for the Borough and a need to ensure that sufficient housing is provided so that this growth potential is not constrained. Similarly, the Borough is likely to see an increased number of families with children and will need to plan accordingly for larger housing.

5.5 The Borough has not escaped the symptoms of the housing market crisis with rising house prices and worsening affordability ratios that make it increasingly likely that younger residents have to move out of the Borough to find suitable housing choices. However, housing delivery has been healthy since the adoption of the current Local Plan in 2015 (averaging 1,686 dpa). This consistent level of recent delivery demonstrates that the market is capable of achieving the housebuilding needs set by Government, and there is evidence that the recent high level of housing delivery is starting to slow down growth in house prices and affordability ratios in this Borough.

5.6 The standard method figure of 1,928 dpa should therefore be treated as a minimum, because:

1. The NPPF clearly states that local plans should meet the development needs of their area and <u>as a minimum</u> provide for the objectively assessed needs for housing. Numerous Inspectors at local plan examinations have supported this position.

2. Housing needs can now expressly justify exceptional circumstances for Green Belt release, and it is mandatory for LPAs, if necessary, to alter Green Belt boundaries when they cannot fully meet housing requirements (unless there is evidence that

doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan).

3. Housing need modelling scenarios which maintain current demographic trends, including an aging population, suggest a housing requirement of at least 1,763 dpa, whilst a scenario which aligns economic growth and housing needs in line with LEP growth aspirations suggests a requirement of at least 2,169 dpa. These two scenarios straddle the SM3 figure of 1,928 dpa.

4. There are potentially significant economic benefits of pursuing at least the 1,928 dpa figure which will not be realised if a lower requirement is set, including:

    a. Over £340m in capital investment p.a.;

    b. Over 10,000 FTE direct and indirect construction jobs p.a.;

    c. Almost £950 million in economic output p.a.;

    d. £22m in resident expenditure p.a.; and

    e. Council Tax revenue of £4.3m p.a.

    The benefits associated with pursuing a more positive economic growth-led housing requirement would be even higher. This needs to be considered against a context of CWaC falling behind its neighbours when it comes to job growth over recent years.

5. CWaC's population is projected to grow at a faster rate than any of its neighbouring authorities as well as relative to the wider regional and national projected growth rates. This presents a need to ensure that sufficient housing is provided so that this growth potential is not constrained.

6. Despite high levels of housing delivery over recent years, there remains a crisis of supply nationally and regionally, and a very challenging affordability gap, both of which can be addressed, or at least slowed, by delivering more housing.

7. Despite high levels of affordable housing delivery, there remains an acute need for new affordable homes to address significant housing waiting list numbers and rising levels of homelessness. The cost of temporary accommodation is having an unsustainable impact on the public purse.

8. High levels of homebuilding will create churn in the market, providing opportunities for first time buyers, growing families or downsizers, and new forms of retirement and care for the ageing population.

9. High levels of new home provision will help to deliver better health and wellbeing outcomes for residents – for example, by addressing overcrowding and the associated mental health toll this can generate, providing greater choice in housing tenures, type, size and location, delivered to modern high efficiency standards which in turn reduces the burden on NHS resources and addresses other related issues such as fuel poverty and cost of living.

5.7 The Consortium urges CWaC to adopt a minimum housing target for the new local plan period derived from the standard method figure of 1,928 dpa. The Consortium looks

forward to working with CWaC during future stages of the local plan preparation to ensure that suitable sites can be allocated to meet this level of need

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Appendix 2: Location Plan

Disclaimer:
Do not scale from this drawing
All contractors must visit the site and be responsible for taking and checking dimensions.
All construction information should be taken from figured dimensions only.
Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.

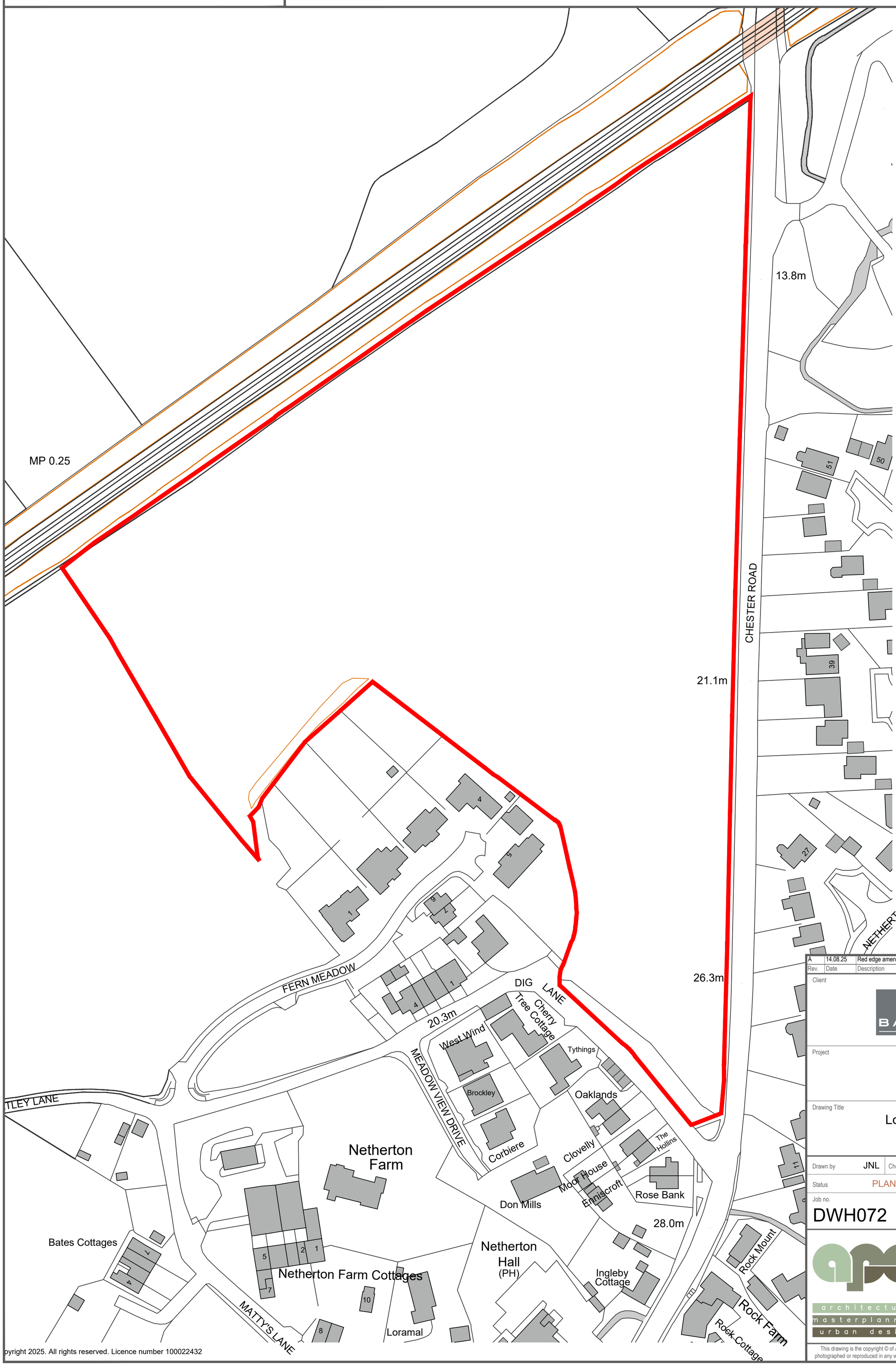
This drawing is for planning purposes only. It is not intended to be used for construction purposes. Whilst all reasonable efforts are used to ensure drawings are accurate, Astle Planning and Design Ltd accept no responsibility or liability for any reliance placed on, or use made of, this plan by anyone for purposes other than those stated above.

1:1000 0 10 20 30 50m

DIG LANE, FRODSHAM

LOCATION PLAN

NORTH



Rev.	Date	Description	By	Chd
A	14.08.25	Red edge amended	JNL	-

Client

BARRATT HOMES

Project

Dig Lane
Frodsham

Drawing Title

Location Plan

Drawn by	JNL	Checked by	-	Date	16.06.2025
Status	PLANNING	Scale @ A2	1:1000		
Job no.	Dwg.no.	Rev.			
DWH072	LP01	A			

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masterplanning
urban design

Appendix 3: Planning Layout Plan

1:500 0 5 10 15 25m

DIG LANE, FRODSHAM

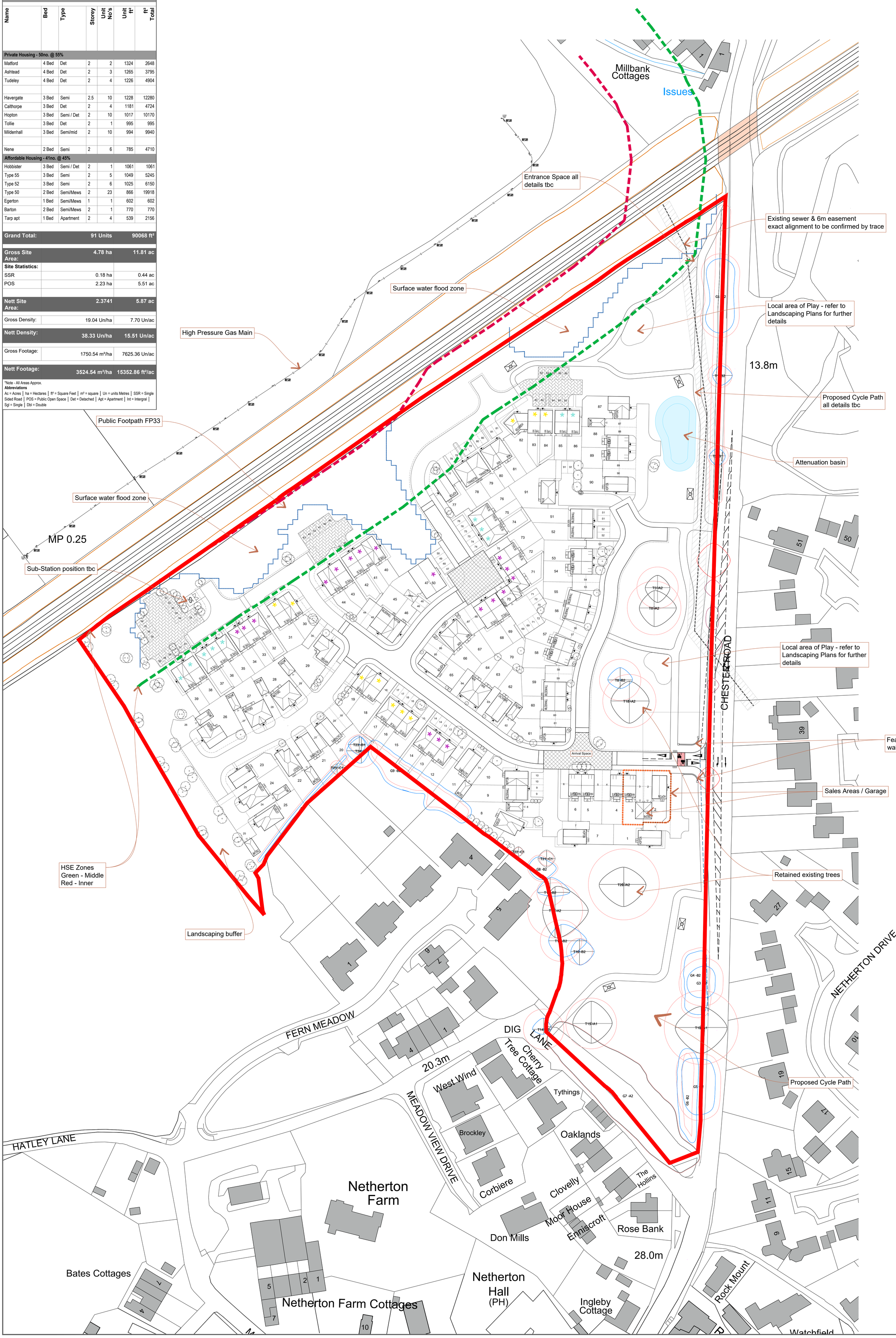
NORTH

ACCOMMODATION SCHEDULE

Name	Bed	Type	Storey	Unit No's	Unit ft²	ft² Total
Private Housing - 50no. @ 55%						
Matford	4 Bed	Det	2	2	1324	2648
Ashtead	4 Bed	Det	2	3	1265	3795
Tudeley	4 Bed	Det	2	4	1226	4904
Havergate	3 Bed	Semi	2.5	10	1228	12280
Calthorpe	3 Bed	Det	2	4	1181	4724
Hopton	3 Bed	Semi / Det	2	10	1017	10170
Tollie	3 Bed	Det	2	1	995	995
Mildenhall	3 Bed	Semi/mid	2	10	994	9940
Nene	2 Bed	Semi	2	6	785	4710
Affordable Housing - 41no. @ 45%						
Hobbister	3 Bed	Semi / Det	2	1	1061	1061
Type 55	3 Bed	Semi	2	5	1049	5245
Type 52	3 Bed	Semi	2	6	1025	6150
Type 50	2 Bed	Semi/Mews	2	23	866	19918
Egerton	1 Bed	Semi/Mews	1	1	602	602
Barton	2 Bed	Semi/Mews	2	1	770	770
Tarp apt	1 Bed	Apartment	2	4	539	2156
Grand Total:				**91 Units**		**90068 ft²**

Gross Site Area:	**4.78 ha**	**11.81 ac**
Site Statistics:		
SSR	0.18 ha	0.44 ac
POS	2.23 ha	5.51 ac
Nett Site Area:	**2.3741**	**5.87 ac**
Gross Density:	19.04 Un/ha	7.70 Un/ac
Nett Density:	**38.33 Un/ha**	**15.51 Un/ac**
Gross Footage:	1750.54 m²/ha	7625.36 Un/ac
Nett Footage:	**3524.54 m²/ha**	**15352.86 ft²/ac**

*Note - All Areas Approx.
Abbreviations
Ac = Acres | ha = Hectares | ft² = Square Feet | m² = square | Un = units Metres | SSR = Single Sided Road | POS = Public Open Space | Det = Detached | Apt = Apartment | Int = Intergral | Sgl = Single | Dbl = Double



Key:-

- Rent
- First Homes
- Shared Ownership
- Indicative Trim-Trail Locations. For further details refer to Landscaping Plan

Rev.	Date	Description	By	Chd
F	14.08.25	Red Edge amended	JNL	-
E	18.06.25	LAP positions added, additional footpath & trim trail positions amended as per Landscaping Design	JNL	-
D	17.06.25	Extent of red edge amended	JNL	-
C	16.06.25	Access details updated - SUDs basin added as per drainage design	JNL	-
B	12.06.25	Layout amended to tracking comments	JNL	-
A	05.06.25	Layout Prepared for Planning Application	JNL	-

Client: BARRATT HOMES

Project: DIG LANE FRODSHAM

Drawing Title: Planning Layout

Drawn by JNL	Checked by -	Date 03.02.25	
Status PLANNING	Scale @ A0 1:500		
Job no. DWH072	Dwg.no. PL01	Rev. F	

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Appendix 4: Green and Grey Belt Appraisal

Green and Grey Belt Appraisal

Land at Dig Lane, Frodsham

June 2025

Turley

Contents

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Client
Barratt & David Wilson Homes North West

Our reference
01061 (v4)

27 June 2025

1. Introduction

1.1 This Green and Grey Belt Appraisal for the Land at Dig Lane, Frodsham has been prepared by Turley Landscape on behalf of Barrat & David Wilson Homes North West. The purpose of the report is to firstly provide an assessment of whether it meets the criteria of 'grey belt' land as set out in the National Planning Policy Framework (NPPF) (December 2024) and supporting Planning Practice Guidance (PPG) on Green Belt Assessment (February 2025 update). Secondly, it provides an assessment of whether development on the Site would be regarded as not inappropriate development in the Green Belt in the context of NPPF paragraphs 155 and 156.

1.2 This Green and Grey Belt Appraisal is arranged in four sections; this first section sets out the site location and description, the methodology and approach; the second section summarises the key characteristics of the Site and local surrounding context; the third and fourth sections comprises a Green Belt Appraisal including a grey belt assessment which considers the Site against the new grey belt tests as set out in the December 2024 NPPF and supporting PPG.

Site Location and Description

1.3 The Site largely comprises a single field of arable land, with a smaller area of loosely managed grassland, wetland grass and scrub as well as several notable mature oak trees. It is located to the south-west of the settlement edge of Frodsham, separated from Frodsham by the railway line and the A56 Chester Road. The Site, as illustrated in **Figure 1.1** is contained to the North by the railway line which is on a raised vegetated embankment. There are further arable fields to the south-west of the Site and to the north-west and west on the opposite side of the railway line, adjoining Hare's Lane. The Site is accessed off Dig Lane on the south-western corner and the boundary along this part of the Site comprises residential streets (Dig Lane and Fern Meadows) with housing and gardens which back onto the Site boundary. The East is bounded by mature hedge planting and the A56 Chester Road.

1.4 The Site is not currently allocated for development in the adopted Development Plan.

Figure 1.1: Site Location

Study Area

1.5 The study area for this assessment includes both the Site and the surrounding wider context within a c.1km radius from its centre. This is considered an appropriate area of study in terms of the enclosure of the Site and the scale of the potential development. **Figure 1.2** illustrates the wider context of the Site: it's position on the edge of the Frodsham settlement boundary and its relationship to the nearest settlement of Helsby, approximately 1.3km to the south west. The context plan (**Figure 1.2**) also highlights areas which are identified within this report such as the industrial areas to the north east of Elton and at Weston Point which, along with Frodsham Wind Farm, form dominant features in views from the Site and surrounding areas.

Figure 1.2: Site Context

Surveys

1.6 A preliminary desk study was undertaken to validate the physical components of the Site and its surroundings. Ordnance Survey (OS) maps and aerial photography were utilised to identify these features. A field study was undertaken by a chartered landscape architect from Turley Landscape in October 2024, during which the visibility was good. The field study recorded the Site and surrounding context's landscape features and the existing settlement pattern of the local area. It involved travelling throughout the study area and producing a working photographic record of the area.

Methodology

1.7 The revised NPPF (December 2024) introduced a new sub-type of Green Belt which is referred to as grey belt land and is defined as:

'land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.'

1.8 Supporting guidance on the methodology and criteria to be used when undertaking green belt assessments and identifying grey belt land was provided in a Planning Practice Guidance Update on Green Belt Assessment (February 2025). This report provides an assessment of the Site against the confirmed definition of grey belt set out in the

December 2024 NPPF and uses the criteria and methodology set out in the new Planning Practice Guidance (PPG). It has been informed by a desktop appraisal of relevant mapping, background documents and a site visit which was undertaken in October 2024.

1.9 The assessment has considered the Site which is currently being promoted for development by Barrat & David Wilson Homes North West.

1.10 The grey belt assessment has been undertaken in two stages. The first stage assessed whether the land makes a 'strong contribution' to any of Green Belt purposes: a) – restricting urban sprawl; b) – preventing towns from merging or d) - preserving the setting and special character of historic towns. The assessment has been informed by the PPG which provides guidance on the indicative features that should be considered when making judgements on the level of contribution for each of these purposes. These are included in **Appendix 1** to this report. The first stage also assessed whether applying the policies relating to the areas or assets of particular importance identified in footnote 7 to paragraph 11 of the NPPF could potentially provide a '*strong reason for refusing or restricting development on the Site'*[1].

1.11 The second stage of assessment was undertaken to assist in judging whether the introduction of residential development on the Site could be regarded as 'not inappropriate' development in the Green Belt in the context of NPPF paragraphs 155 and 156.

[1] NPPF glossary definition of grey belt land

2. Key Characteristics of the Site and Local Context

2.1 The site survey and desktop appraisal of background documents identified the following features and characteristics of the Site and the surrounding Green Belt area.

.1 **Land use:** Primarily open arable field with loosely managed grassland in the southern corner and a wetland grass area towards the centre.

.2 **Site boundaries:** The Site is contained by a hedgerow to the east; residential properties associated with Dig Lane and Fern Meadows which wrap around the Site to the south-west and south; the railway line set upon embankment to the north; and, mature tree planting along the boundary Fern Meadows properties as well as Dig Lane to the south. The condition of boundary treatments that separate the residential plots from the Appraisal Site is variable. Boundary treatments include close board timber fencing, some of which is partially screened by mature tree planting (**Figures 2.4 and 2.5**).

.3 **Topography:** The topography of the Site slopes notably down from c.27.5m AOD at the south-east corner to c.12m AOD at the north east corner. The fall in levels is particularly experienced along the eastern boundary with the A56 Chester Road. The Site slopes gently down from east to west up to the central portion where it becomes more level, slightly undulating arable field. Beyond the site to the north and west, the topography is relatively flat.

.4 **Sense of enclosure and views:** The Site is well contained on all sides by a combination of built features and vegetation including: a mature boundary hedge (comprising thorn species and holly), mature oak species trees, residential properties and railway embankment. Views from within the arable field area are restricted northwards and limited westwards. There are long distance views towards The War Memorial at the summit of Overton Hill and the wooded Sandstone Ridge which stretches from Frodsham to Malpas, to the south east of the Site. Residential properties at Fern Meadows and Dig Lane are prominent features within these views (**Figure 2.3**). There are also open and extensive views, from the higher ground within the Site, across the Frodsham, Helsby and Lordship Marshes towards the River Mersey and industrial areas at Weston Point, south of Runcorn (**Figure 2.1**).

.5 **Access** : A public footpath (ref: FP33) crosses the Appraisal Site along its northern extend, accessed through a field gate at the north-east corner of the Site adjacent to the railway bridge. Private access to the Site is gained off Dig Lane, through a field gate (**Figure 2.4**). The Site is several minutes' walk from Main Street Frodsham. It is opposite Castle Park and the Frodsham Town Council building, separated by the A56 Chester Road.

.6 **Urban features and human influences:** Noise from the busy A56 is audible when in the Site and vehicles are glimpsed moving along the carriageway (**Figure 2.3**). Properties along Netherton Drive and the streetlights which line the road, are noticeable features from within the Site as well as when travelling along the A56. Views looking north west from within the Site feature the railway line which bounds the northern edge of the Site, the M56 North Cheshire Motorway, Frodsham Wind Farm and industrial development on the north bank of the River Weaver all to the north/north-west (**Figure 2.2**).

.7 **Settlement pattern:** Policy STRAT 2 Strategic Development within the Adopted Local Plan[2] sets out the Settlement Hierarchy for the District. In this, the main focus for new development is within or on the edge of Chester and the towns of Ellesmere Port, Northwich and Winsford. Frodsham and Helsby are both identified as secondary areas for development and as '*key service centres'*.

.8 **Landscape character:** The Site is situated within landscape character area *LCA5f Helsby to Frodsham* and is within the typology of *Undulating Enclosed Farmland*[3]. A landscape character appraisal is set out within the CSA LVIA report with references to the Cheshire Landscape Character Assessment and is not repeated here. However a key point to note, with relevance to the Site and the Green Belt assessment, is the description of Landscape Condition on page 190 which identifies the suburban character of the local environment: "*The areas of 20th century ribbon development give the landscape a 'suburban' appearance, particularly alongside the A56 which is lit along its entire length through this character area between Helsby and Frodsham".* The concerns set out within the 'Forces for Landscape Change' section of the Landscape Strategy are the gradual suburbanisation and "*narrowing of the open gap between Helsby and Frodsham*". As demonstrated by **Figure 2.1** below, the Site does not form part of the open gap between the two settlements.

[2] Cheshire West and Chester Council Adopted Local Plan (Part One) Strategic Policies, January 2015

[3] A Landscape Strategy for Cheshire West and Chester Borough, 2016 (Part 2)

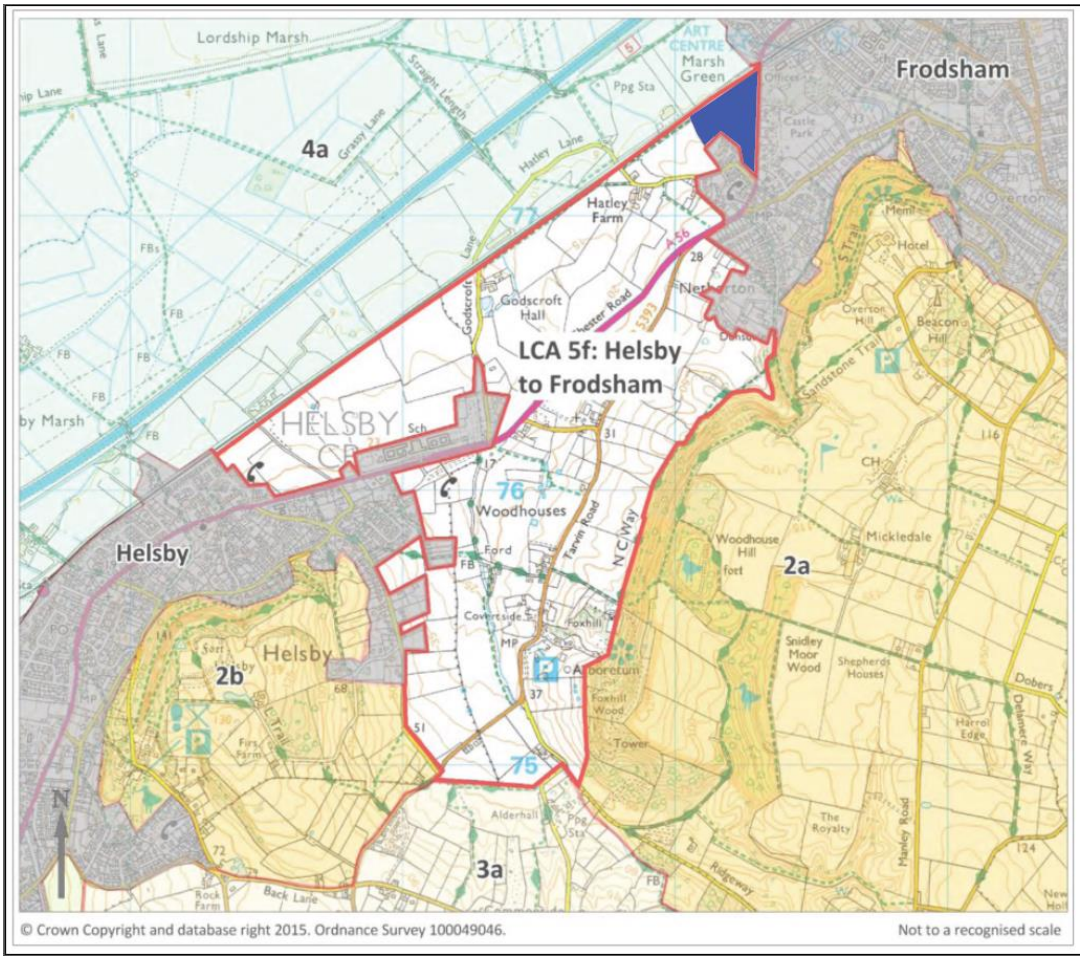

Figure 2.1: LCA5f: Helsby to Frodsham. Map extracted from 'A Landscape Strategy for Cheshire West and Chester Borough'. The Site location is indicated with a dark blue shaded area.

Figure 2.2: **View looking north west from within the Site towards the railway line, M56 North Cheshire Motorway, Frodsham Wind Farm and industrial development on the north bank of the River Weaver demonstrating the presence of urbanising features in views from this area**

Figure 2.3: **View through one of the gaps in the hedgerow along the eastern boundary of the Site. This illustrates the prominence of traffic along the adjacent A56 Chester Road and the properties along Netherton Drive.**

Figure 2.4: **View looking towards south-east from the public footpath ref: FP33 which runs along the northern edge of the Site. The residential properties along Fern Meadows feature within the view: containing the Site and contributing to the settlement edge character. The War Memorial at the summit of Overton Hill and the Sandstone Ridge forms a notable feature on the skyline.**

Figure 2.5: **Residential properties along Dig Lane contain views from the south east corner of the Site. The industrial area to the north east of Elton is a prominent feature in the background of views.**

Figure 2.6: **An example of the south-western boundary of the Site which is contained by vegetation and boundary fencing of the residential properties along Dig Lane and Fern Meadows.**

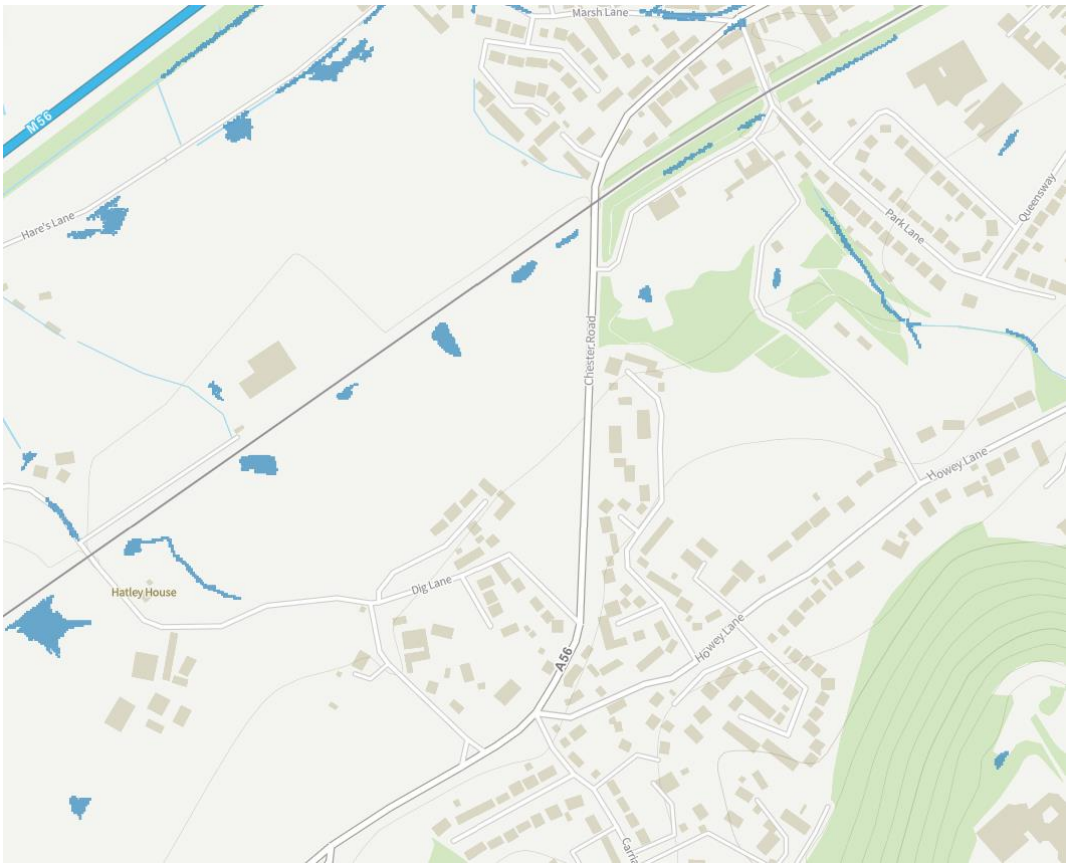

Figure 2.7: **Extract from Environment Agency surface water flooding map**

2.2 The current Environment Agency flood map [4] shows the Site is in flood zone 1 and has a very low probability of flooding from rivers and the sea. The Site is not generally at risk of surface water flooding, with the exception of localised areas at the base of the railway embankment on the north-western boundary, as shown on **Figure 2.7** above.

2.3 As illustrated on **Figure 2.8**, the Site area owned by Barrat & David Wilson Homes North West does not fall within or close to a national landscape designation. Cheshire West & Chester Council designate important regional landscapes through the term 'Area of Special County Value (ASCV). The Site does not fall within this designation with the closest being the Helsby & Frodsham Hills ASCV, as illustrated by **Figure 2.9**. The draft Frodsham Neighbourhood Plan identifies Local Green Space in line with NPPF and PPG guidance. The Site is not designated as a Local Green Space. The Archaeology & Heritage Desk-Based Assessment (DBA) prepared by CSA Environmental (Revision B 26/06/25) sets out and describes the designated heritage assets (and other heritage assets of archaeological interest) on and within the vicinity of the Site. There are two conservation areas in the vicinity of the Site: Castle Park (which is also a Registered Park and Garden) to the east and Frodsham (Town) to the north-east.

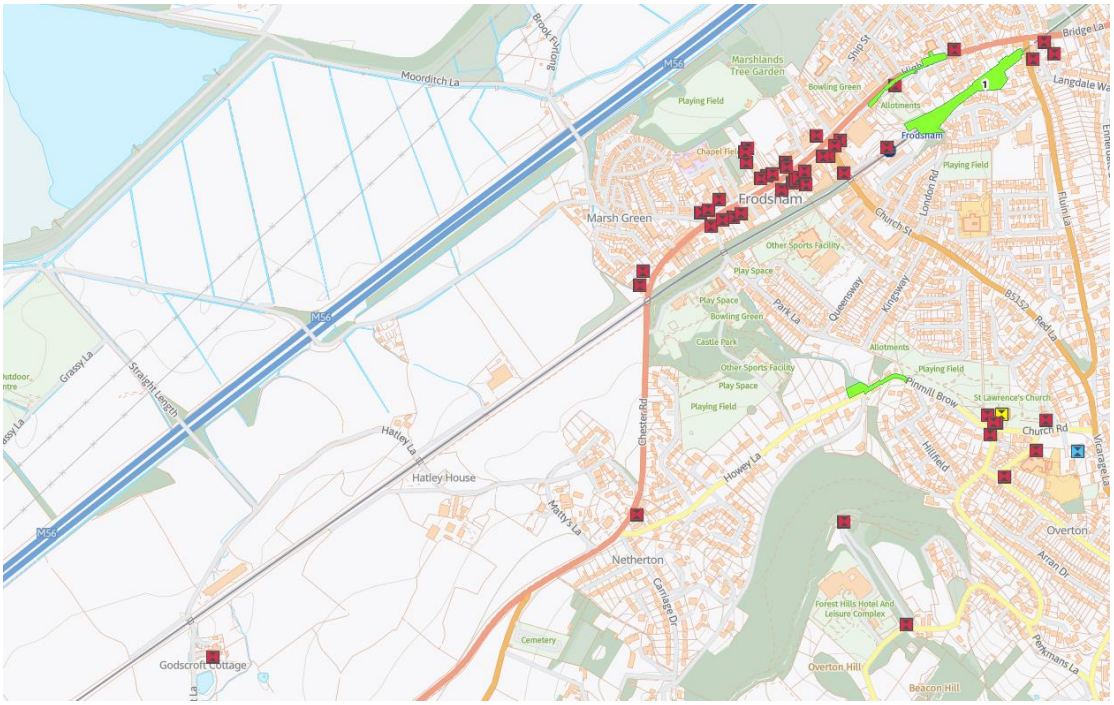

Figure 2.8: Extract from MAGIC Map confirming there are no national designations within the Site. Grade II listed buildings are indicated with a red square, Grade II* with a blue square and Grade I with a yellow square.

[4] https://check-long-term-flood-risk.service.gov.uk/ accessed 23/04/25

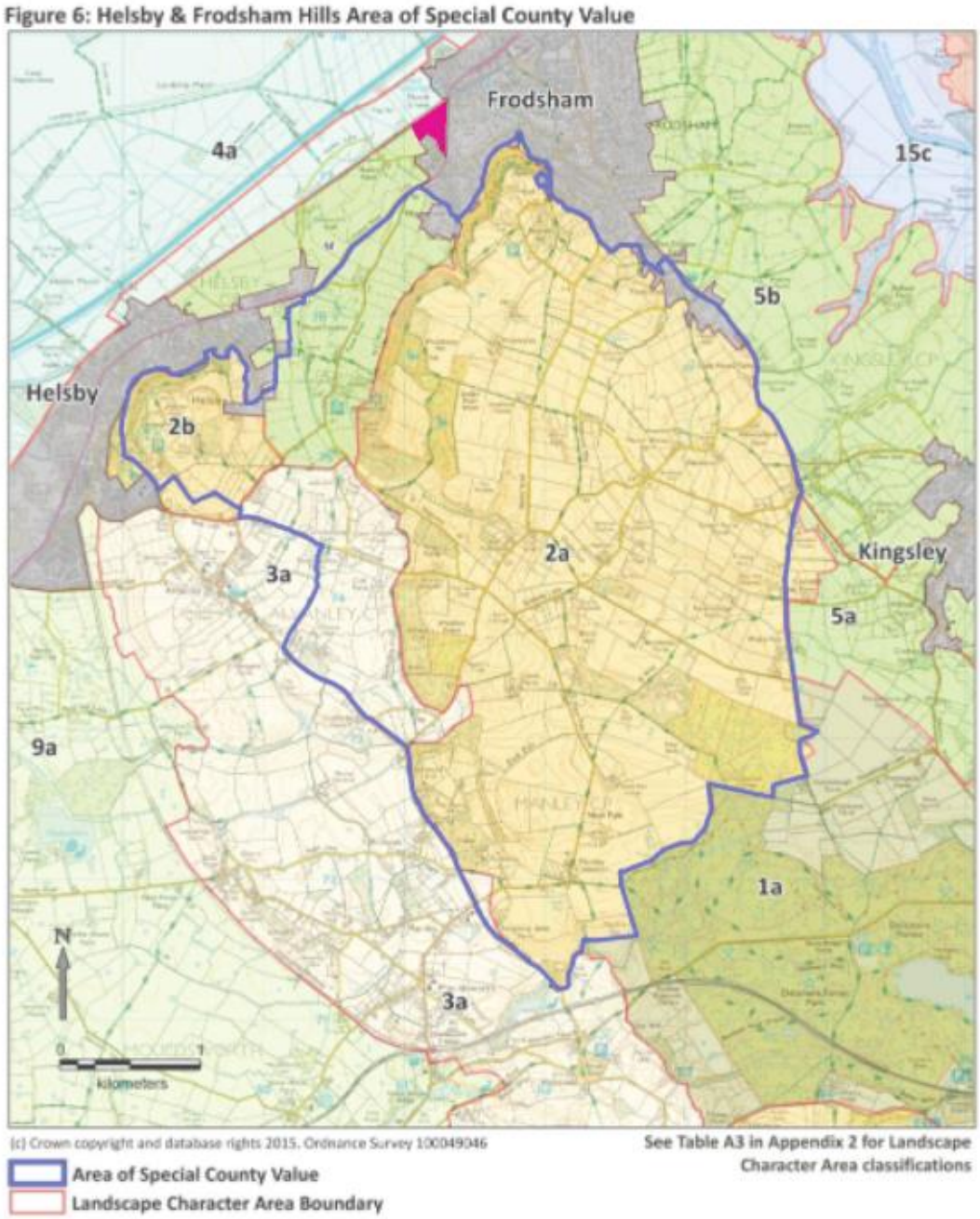

Figure 2.9: Map extracted from 'Local Landscape Designations: Areas of Special County Value in Cheshire Wester and Chester, June 2017'. The Site location is indicated with a pink shaded area.

3. Part 1: Does the Site meet the definition of grey belt land?

Introduction

3.1 As illustrated by **Figure 3.1** below, part 1 of this report makes an assessment of whether the land which forms the Site can be identified as grey belt, in line with government guidance[5]. The first part of this chapter considers whether the land contributes strongly to Green Belt Purposes a, b and d. The second part appraises whether there are areas or assets of importance (identified in footnote 7 to the NPPF) within or close to the Site which would provide a strong reason for refusing or restricting development.

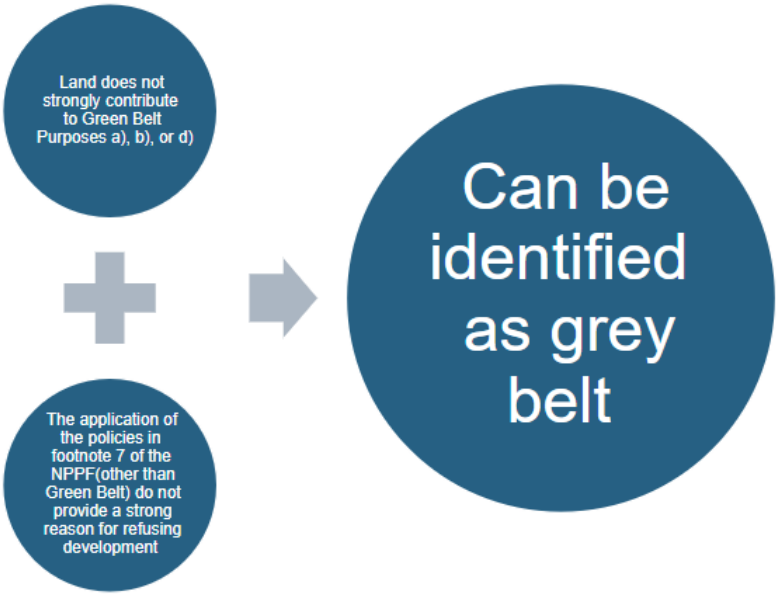

Figure 3.1: Extract from the Green Belt Guidance: 'Figure 1. When can land be identified as grey belt'. Paragraph: 007 ID: 64-007-20250225

Green Belt Context

3.2 Cheshire West and Chester Green Belt Study (Parts 1 and 2, March 2016) form the Council's latest Green Belt Study. However, this focuses on land around Chester and neither Part 1 or Part 2 provides an assessment of the wider Green Belt outside the fringes of Chester. As a result, no assessment of the Site or the Green Belt around Frodsham has been carried out by the Council.

[5] https://www.gov.uk/guidance/green-belt

Green/grey Belt Assessment of the Site

Contribution of the Site to Green Belt Purposes a, b and d

3.3 To meet the definition of 'grey belt', land must be previously developed land and/or, not contribute strongly to Green Belt purposes (a), (b) or (d). The Green Belt context of the Site is illustrated in **Figure 3.2** below and the contribution of the Site to purposes a), b) and d) is then considered below in **Table 3.1**. This assessment is based on the approach and criteria set out in the PPG on Green Belt Assessment (published February 2025), the criteria of which is enclosed within **Appendix 1**.

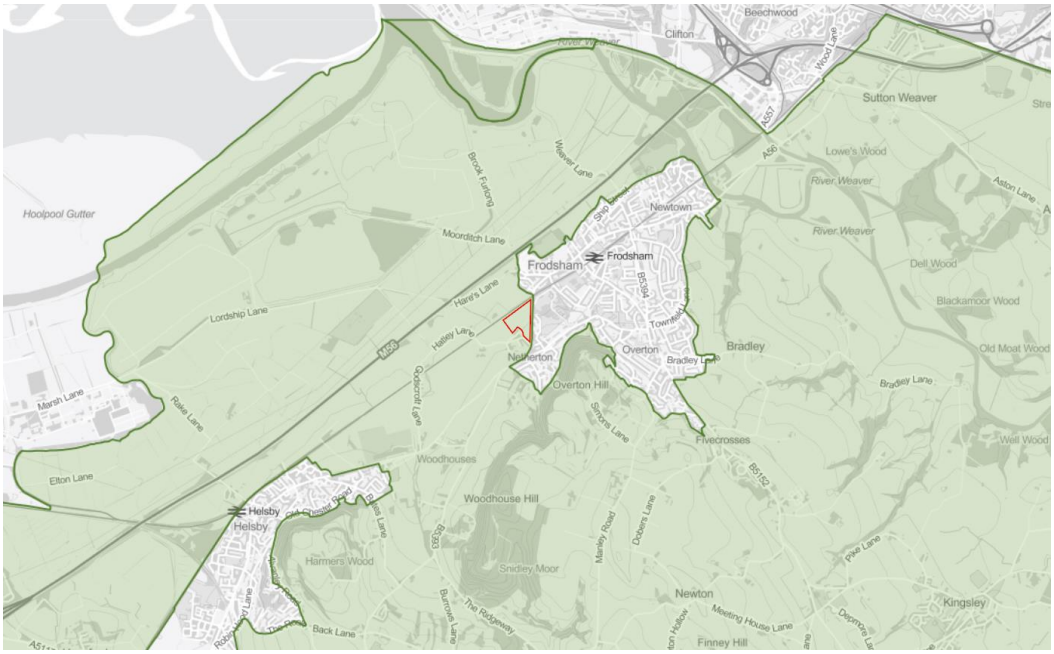

Figure 3.2: Green Belt context (source: English Local Authority Green Belt Dataset, December 2024). The Site is shown indicatively with a red outline

3.4 The Site boundary includes agricultural fields and does not comprise of Previously Developed Land.

Table 3.1: Assessment of Site against Green Belt purposes a, b and d

Purpose	Contribution
(a) To check the unrestricted sprawl of large built-up areas	**None -** Turley consider that Frodsham is a small town and does not constitute a 'large built-up area'. As a result, and in line with PPG guidance, the Site makes no contribution to this purpose. However, large built-up areas are defined and interpreted differently and there is no specific definition for Frodsham, particularly given the absence of a local authority Green Belt Study for the area,

		which would define large built-up areas for this purpose. Should Frodsham be defined as a large built-up area by Cheshire West & Chester Council, Turley would consider (in line with the PGG criteria) that the Site makes a **Moderate** contribution to this purpose, given the Site has physical features (the railway line and the A56 Chester Road) in reasonable proximity that could restrict and contain development.
(b)	To prevent neighbouring towns from merging into one another	**Weak** - The Site meets the PPG description for a weak contribution to purpose b as it performs a very small part of a wider gap between Frodsham and the nearest settlement: Helsby c.1.3km to the south-west, without making a contribution to the visual separation of the settlements. There are significant areas of open landscape between the Site and Helsby, with the village of Netherton (parts of which form the Frodsham Policy Boundary[6]) to the south of the Site forming the recognised and distinctive edge between these two Towns. The open landscape areas to the south-east of Netherton Hall, either side of the A56 Chester Road and the B5393 make the critical contribution to preventing the neighbouring towns of Frodsham and Helsby from merging.
(d)	To preserve the setting and special character of historic towns	**Moderate** - the Site meets PPG description for a moderate contribution to purpose d in that there is limited visual, physical, and experiential connection between the Site and the heritage aspects of the closest historic town (Frodsham) due to the separation by the rail line and more recent development.

3.5 In conclusion, the Site is not considered to perform strongly against the Green Belt purposes a), b), or d).

[6] Frodsham Town Design Statement, Adopted SPD July 2010

Relevance of Footnote 7 areas/assets of importance to the Site

3.6 Land defined as grey belt excludes areas *'where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development'*. The Site has therefore been reviewed against the areas/assets of particular importance identified in 'footnote 7' of the NPPF set out in **Table 3.2**. This analysis is based on available desktop sources and following a Site visit carried out in October 2024.

Table 3.2: NPPF Footnote 7 Area or Asset of Importance

Area or Asset of Importance	Comment
Habitats sites[7] (and those sites listed in paragraph 189) and/or designated as Sites of Special Scientific Interest	The Site is not covered by, or close to, any of the designations listed in paragraph 189 and it is not an SSSI.
Local Green Space	The Site is not designated (nor proposed) as Local Green Space.
Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast	The Site is not within, or close to, any of these designations.
Irreplaceable habitats	No 'irreplaceable habitats' have been identified on the Site.
Designated heritage assets (and other heritage assets of archaeological interest)	The Archaeology & Heritage Desk-Based Assessment (DBA) prepared by CSA Environmental (Revision B 26/06/25) sets out and describes the designated heritage assets (and other heritage assets of archaeological interest) on and within the vicinity of the Site. Castle Park Registered Park and Garden & Conservation Area lies to the east of the Site. The Frodsham (Town) Conservation Area extends from the historic core of the town either side of Main Street towards the north-east corner of the Site, separated by the railway line and overbridge. There are no Scheduled

[7] Habitat sites are defined in the glossary to the NPPF (December 2024) as *'Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.'*

	Monuments in the vicinity of the Site. There are two Grade II listed buildings to the north of the railway line and overbridge. The DBA concludes that the introduction of development on the Site would result in harm to Castle Park which (para 6.2) '*would be less than substantial, at the lower end of this harm spectrum'*. and (para 6.4) '*Residential development of the Site is not expected to adversely impact any other designated heritage assets as a result of alteration to setting'*. This level of harm is not considered likely to represent a strong reason for refusal.
Areas at risk of flooding or coastal change	Environment Agency flood risk mapping shows the Site as being within Flood Zone 1 and at low risk of flooding from other sources.

3.7 Based on the above, we consider it unlikely that the Site would be considered as containing any areas or assets of particular importance identified in footnote 7 to the NPPF that would potentially provide a strong reason for refusing or restricting development on the Site.

Opportunities to enhance Green Belt

3.8 National policy requires that where grey belt is brought forward for development it should meet the "golden rules" (NPPF para 156). These include, for housing development, higher levels of affordable housing; necessary infrastructure provision; and delivering enhancement to the Green Belt through the provision of new, or improvements to existing, green spaces that are accessible to the public. Potential opportunities for delivering Green Belt enhancements in association with development opportunities for the Site are detailed within the Planning Statement (paragraph 7.35).

Conclusion on the grey belt appraisal

3.9 The Site does not perform strongly against Green Belt purposes a), b) or d) and no assets or areas of importance have been identified which would potentially provide a strong reason for refusing or restricting development on the Site. There is therefore a strong case that the Site should be considered as grey belt land.

3.10 The potential impacts of proposed development within the Site on the strategic function of the Green Belt is provided in **Section 4**.

4. Part 2: Is development appropriate?

Introduction

4.1 For development on grey belt land to be regarded as not inappropriate in the Green Belt, a number of criteria need to be met (as set out in paragraphs 155 and 156 of the NPPF). These criteria are illustrated in Figure 4.1 and each one is then assessed below.

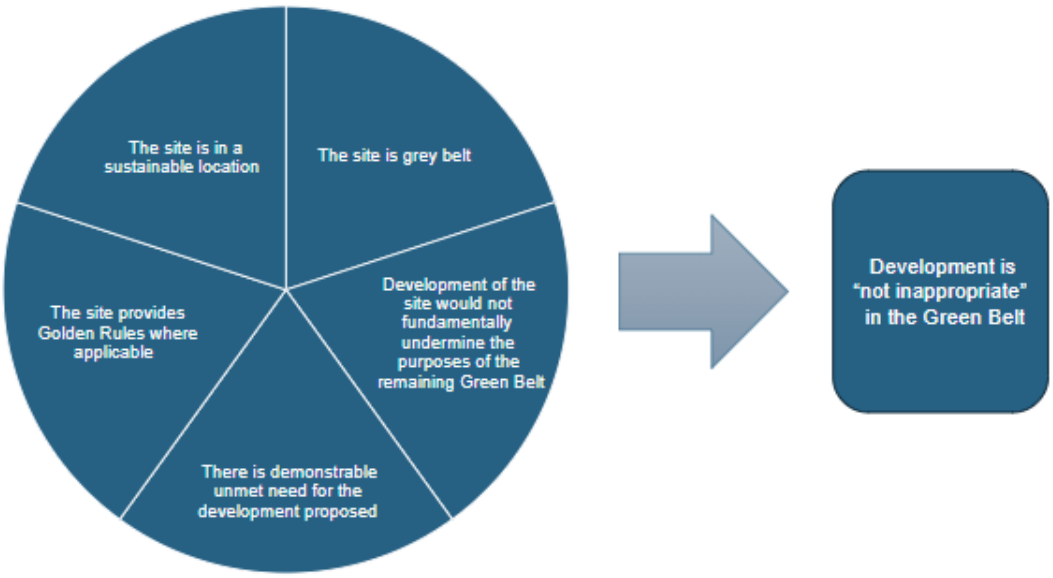

Figure 4.1: Extract from the Green Belt Guidance: 'Figure 2. When is development in the Green Belt not inappropriate under paragraph 155 of the NPPF?' Paragraph: 010. Reference ID: 64-010-20250225

Impact on the fundamental functioning of the Green Belt

4.2 Paragraph 155a requires that development proposals must not '*fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan*[8]'. The PPG on Green Belt Assessment advises that, to come to a judgement on this, '*authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way'.* This stage of the assessment is provided in **Table 4.1** below**.**

[8] NPPF para 155a

Table 4.1: Impact of development proposals on the strategic functioning of the remaining Green Belt

Green Belt Purpose	Impact on the strategic functioning of the remaining Green Belt
Purpose a - To check the unrestricted sprawl of large built-up areas	Turley considers that the Site does not contribute to this purpose (as demonstrated in **Table 3.1**). There would therefore be no change to the strategic functioning of the Green Belt in relation to this purpose. However, as stated in **Table 3.1**, should Frodsham be defined as a large built up area by Cheshire West & Chester Council, it is considered that the Proposed Development forms a modest part of the area of Green Belt land within the borough which contributes to this purpose and, (as demonstrated in **Table 3.1**), does not make a strong contribution to this purpose. Development of the Site would represent a limited change to the extent of large built-up areas in the borough and would be restricted and contained by existing physical features. Development would not fundamentally undermine the functioning of the Green Belt, and the remaining Green Belt across the area of the plan would continue to serve this purpose in a meaningful way.
Purpose b - To prevent neighbouring towns from merging	As set out in **Table 3.1**, the Site forms only a very small part of the wide area of Green Belt which separates the towns of Frodsham and Helsby. The proposals would represent a small change to the gap between these settlements and would not change the actual or perceived separation of these settlements. Resultantly, if development were introduced on the Site, it would not undermine the functioning of the remaining Green Belt, across the area of the plan, serving purpose b in a meaningful way.
Purpose c- to assist in safeguarding the countryside from encroachment	The proposals would introduce development into an area which is currently undeveloped land, but is enclosed, on all but a marginal section of the western side, by residential properties (accessed off Fern Meadows and Dig Lane), the railway line and the local road network (the A56 Chester Road). As such, the development area would be well contained and would integrate with the existing settlement edge. It would therefore have a weak influence on the character and appearance of the wider, surrounding countryside and not form an incongruous intrusion into the countryside. Consequently, it would not weaken or

	compromise the ability of the remaining Green Belt across the area of the plan from serving purpose c in a meaningful way.
Purpose d – To preserve the setting and special character of historic towns	Due to the expansion of Frodsham with more modern development and given the separation created by the railway line and local road network, the Site is not considered to form part of the setting or special character of Frodsham Town. Resultantly, the introduction of development on the Site would not undermine the ability of the remaining Green Belt in the plan area from serving purpose d in a meaningful way.
Purpose e - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land	All Green Belt within the plan area achieves purpose e to the same extent. There would be no change to this as a result of the development on the Site.

4.3 In conclusion, as demonstrated in **Table 4.1** above, it is clear that the Proposed Development would not '*fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan'* and would not '*affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way'*.

Unmet development needs

Five-year housing land supply and delivery

4.4 National planning policy[9] requires Local Planning Authorities (LPA's) to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old.

4.5 The Local Plan (Part Two) Land Allocations and Detailed Policies ('LPP2') was adopted in July 2019. As it is more than five years old, the five-year housing land supply (5YHLS) calculation must be carried out using the local housing need (LHN) figure derived from the standard method as required by NPPF and Planning Practice Guidance (PPG). The Council has clearly accepted this approach in their Cabinet meeting report (dated 15 January 2025), stating that:

"The impact of the change to LHN and applying this to calculate housing land supply is significant because it will mean that the Council ***will not be able to demonstrate a five-year housing land supply****. This means that plan policies considered the most important for determining planning applications are considered out of date and planning permission should be granted unless the site is in a protected area, such as vulnerable*

[9] NPPF, paragraph 78

to flood risk or important habitat, or the adverse impact would significantly and demonstrably outweigh the benefits."

4.6 CWACC's most recent housing land supply information is provided in the 2024 Annual Monitoring Report, which provides information as at 1 April 2024. This claimed a 5YHLS of 4,209 dwellings. Based on the annual requirement of 420 net dwellings per year (the standard method figure at that time, including a 5% buffer), this equates to a 9.5 years supply (as of 1 April 2024).

4.7 However, as a result of the recent changes to the standard method, the LHN figure is now far greater than that used in the Council's assessment. The revised standard method, including affordability adjustment, generates a local housing need figure in CWACC of 1,928 dpa.

4.8 In addition, the NPPF confirms that the 5YHLS should also include an additional 5% buffer (moved forward from later in the plan period) to ensure choice and competition in the market for land[10]. The revised five-year requirement in CWACC is therefore:

- 5 years x 1,928 dwellings = 9,640 dwellings, plus
- 5% buffer (5% of 9,560) = 482 dwellings
- Total = 10,122 dwellings (or 2,024 dpa)

4.9 In applying the updated standard method figure to CWACC's most recent supply information, it is identified that CWACC can only demonstrate a **2.1 year housing supply**. As such, there is a clear need for housing development in the borough.

4.10 For the avoidance of doubt, no interrogation of the robustness of CWACC's claimed supply has been undertaken as part of this planning application. It is expected that doing so would reduce this figure further either through the inclusion of undeliverable sites or flawed assumptions around the amount of housing that particular sites can deliver within the five-year assessment period.

Sustainable location

4.11 In accordance with paragraph 155 of the NPPF, consideration as to whether development is located within a sustainable location should have particular reference to paragraphs 110 and 115 of the NPPF.

4.12 Paragraph 110 states:

"The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport

[10] NPPF, paragraph 78

solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."

4.13 Paragraph 115 states:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;

b) safe and suitable access to the site can be achieved for all users;

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code[48]; and

d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach."

4.14 The proposed development lies adjacent to the settlement boundary of Frodsham and benefits from connectivity to sustainable transport modes including buses and railway.

4.15 Furthermore, the Site is well positioned to make use of the existing PRoW network. Footpath 'Frodsham FP33' runs along the western boundary of the Site, providing a connection between A56 Chester Road and Hatley Lane. Where footpath 'Frodsham FP33' terminates at Hatley Lane, footpaths 'Frodsham FP53' and 'Frodsham FP34' can be accessed a short distance to the north-west and south-east respectively.

4.16 A short distance to the south of the A56 Chester Road/Dig Lane junction, footpath 'Frodsham FP32' can be accessed via steps in the western verge of the A56 Chester Road, which provides a shortcut route for those travelling between the A56 Chester Road and Howey Lane.

4.17 Overall, the Site is well served by the existing sustainable transport provision. It is located within proximity to a number of facilities and services, which are accessible via a number of sustainable non-car modes including walking and cycling. The existing public transport provides a wide range of connections to key locations such as Manchester, Liverpool and is of high frequency.

4.18 A Transport Assessment has been prepared in support of the application, and includes an assessment of the proposed development in terms of its accessibility and demonstrates that the proposed development will have good access to a range of schools, health provision, local shops and food stores, employment opportunities and leisure facilities, enabling residents to access these everyday facilities on food and cycle.

4.19 The Town Centre facilities will also be accessible via foot or cycling, through enhanced connections proposed as part of the development. This is consistent with the requirements of NPPF paragraph 110.

4.20 The Transport Assessment also includes an assessment against the requirements of NPPF paragraph 115. It demonstrates compliance on the basis that the proposed development:

- Prioritises sustainable travel by future residents to and from the development, various sustainable transport links and improvements, as well as the production of a Travel Plan;
- Will provide safe and suitable access for all users;
- Is capable of being designed to a high quality, in accordance with relevant guidance; and
- Will not have unacceptable traffic impacts on congestion or road safety.

4.21 The development will form a logical extension of the existing urban area which can be integrated with the surrounding established community, existing employment locations, and key transport routes. The Site is therefore considered to represent a "sustainable location" for housing development for the purposes of consideration of grey belt.

Conclusions

4.22 NPPF provides that the absence of a 5YHLS or failure of the Housing Delivery Test would mean that new housing development on grey belt would not be regarded as inappropriate in the Green Belt. In applying the updated standard method figure to CWAC's most recent supply information, it is identified that CWAC can only demonstrate a 2.5 year housing supply. As such, there is a clear need for housing development in the borough.

4.23 This ongoing housing land supply position should be monitored closely.

4.24 Residential development within the Site could be successfully integrated into the landscape due to the existing pattern of development in the surrounding area, the containment from the wider landscape and the existing landscape features and framework that would provide a defensible settlement edge.

Appendix 1: Extract from Planning Practice Guidance (February 2025)

Green Belt

Advice on the role of the Green Belt in the planning system.

How should the contribution land makes to the relevant Green Belt purposes be assessed?

When making judgements as to whether land is grey belt, authorities should consider the contribution that assessment areas make to Green Belt purposes a, b, and d. Considerations for informing these judgements are set out below:

Purpose A – to check the unrestricted sprawl of large built-up areas

This purpose relates to the sprawl of large built-up areas. Villages should not be considered large built-up areas.

Contribution	Illustrative features
Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: - be adjacent or near to a large built up area- if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences
Weak or None	Assessment areas that make only a weak or no contribution are likely to include those that: - are not adjacent to or near to a large built up area- are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development

Purpose B – to prevent neighbouring towns merging into one another

This purpose relates to the merging of towns, not villages

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - forming a substantial part of a gap between towns- the development of which would be likely to result in the loss of visual separation of towns
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - Forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation
Weak or None	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation

Purpose D – to preserve the setting and special character of historic towns

This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose.

Contribution	Illustrative Features
Strong	Assessment areas that contribute strongly are likely be free of existing development and to include all of the following features: - form part of the setting of the historic town- make a considerable contribution to the special character of a historic town. This could be (but is not limited to) as a result of being within, adjacent to, or of significant visual importance to the historic aspects of the town

Moderate	Assessment areas that perform moderately are likely to form part of the setting and/or contribute to the special character of a historic town but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - being separated to some extent from historic aspects of the town by existing development or topography- containing existing development- not having an important visual, physical, or experiential relationship to historic aspects of the town
Weak or None	Assessment areas that make no or only a weak contribution are likely to include those that: - do not form part of the setting of a historic town- have no visual, physical, or experiential connection to the historic aspects of the town

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