

Cheshire West & Chester Local Plan

Representations on Issues and Options Draft

Date of report: August 2025

PREPARED FOR:
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savills

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Document History

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1.0	08/08/25	SW	Draft for review
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1. Introduction

- 1.1 Savills (UK) Limited ('Savills') is instructed by Michael and Amanda Vernon to submit representations on the Issues and Options (Regulation 18) draft of the Cheshire West and Chester Council Local Plan ('New Local Plan').
- 1.2 The current Local Plan for Cheshire West and Chester ('CW&C') comprises 2 parts. Part 1 sets out the strategic policies, including the housing requirement, spatial strategy, and strategic designations. This was adopted in January 2015. Part 2 sets out land allocations and detailed development management policies. These are based on the strategic framework set by Part 1. Part 2 was adopted in July 2019.
- 1.3 The Council has resolved to begin the preparation of a New Local Plan which will, upon adoption, supersede both parts of the current Local Plan. We support this approach.
- 1.4 The Issues and Options Regulation 18 draft represents the first publication of the New Local Plan and the first opportunity for interested parties to comment. It is supported by Background Papers on various topics as well as background data on settlements.
- 1.5 At the heart of the National Planning Policy Framework (NPPF) is the Presumption in Favour of Sustainable Development (Paragraph 11), which requires plans to meet the development needs of their area and sets out requirements for strategic policies.
- 1.6 These representations will focus on ensuring that the new Local Plan is drafted in accordance with the criterion set out in the NPPF and associated guidance within Planning Practice Guidance (PPG).
- 1.7 The interests of our client are set out in detail at Section 2. However, for clarity the land holding relates to two clear adjacent parcels of land. These are - :
 1. Land to the east of the railway line and south of Gadbrook Park, Northwich (site reference 1402). This land is being promoted for inclusion in the new Local Plan as an employment allocation within the Gadbrook Park employment area and an extension to existing employment allocation under Policy N4(f). This land is shown in red on the below location plan and provided at Appendix A.
 2. Land south of A556 West of Gadbrook Park, Northwich (Site reference 0878), which is an existing employment allocation under Policy N(f) of the CW&C Local Plan Part 2. This land is being brought forward by Stoford Developments and is only mentioned in these representations in terms of its relevance to the delivery of 1) above. This land is shown in blue on the location plan (below and at appendix A).
- 1.8 The focus of these representations is 1) above, referred to as land to the east of the railway line.



Figure 1.1: Location Plan (the area outlined in red is the focus of these representations)

- 1.9 For completeness a location plan is provided at **Appendix A**.
- 1.10 We have also made a separate Call for Sites submission for site 1).
- 1.11 This document is structured into the following sections:
 - Section 2 – The Opportunity
 - Section 3 – Current Planning Policy Context
 - Section 4 – Representations on the New Local Plan – Issues and Options
 - Section 5 – Summary and Conclusions

2. The Opportunity

The Site

- 2.1 The Site in red lies to the south of the Gadbrook Park employment area about 2km from the Northwich Town Centre. The entire Site falls within Policy N5 'Gadbrook Park' employment area. Access will be gained via a new junction on the A556 to be brought forward by Stoford Developments.
- 2.2 The Site in red is being promoted as part of the new Local Plan as a new employment allocation, which would represent a sensible extension to the employment offering in Northwich. The land to the east of the railway, extends to circa 18 Ha.
- 2.3 The Site in blue is specifically allocated for employment uses under Policy N4(f) and which is being brought forward by Stoford Development under a development agreement with the landowner. We understand that pre-application advice has been sought and obtained for this parcel of land, with a planning application due to be submitted imminently. The Site in blue extends to 33.49 hectares.
- 2.4 Under the terms of the agreement with Stoford, all the necessary rights of access and connection to the red land via the blue land have been retained. Therefore the delivery of the Stoford scheme is the key to delivering the red land as well.



Figure 2.1: Location Plan

- 2.5 Both of the sites together would therefore total c. 51 Ha of land which would make a sensible extension to the existing Gadbrook Business Park to the north and wider Gadbrook Park employment area. The entire site is an opportunity to create a significant clustering of economic activity in this part of Northwich.
- 2.6 To ensure flexibility moving forward and to cater for a wide range of occupiers, the land to the east of the railway (Site 1 red land) is being put forward for a range of employment uses, covering Class B2, B8 and Class E(g) (iii). This proposed offering would complement the existing uses and those proposed by Stoford on the existing employment allocation.

Site Context

- 2.7 To the north of the Site is Gadbrook Business Par where a number of businesses are located including THG and Roberts Bakery. Further east of Gadbrook Business Park is Morrison's Distribution Centre.
- 2.8 Gadbrook Park, as subject to Policy N5, is located in a highly accessible location for development, where it can meet an established need for industrial, storage and distribution uses.
- 2.9 The Site is located in an excellent location for commercial development, where it can meet an established need for manufacturing, industrial, storage and distribution uses. It has good connectivity to the strategic highways network with immediate access to the A556. This connects to junction 19 of the M6, approximately 9km to the north east, and which is a prime corridor for strategic commercial occupiers.
- 2.10 The Site itself is in a wholly suitable location for large scale employment development and is set within a context of urbanising influences and existing employment development.
- 2.11 There are considered to be synergies between the well-established businesses at Gadbrook Park and the proposed development at the Site with the potential to create a significant clustering of economic activity.



Figure 2.2: Map showing Site Context

3. Current Planning Policy Context

Current Development Plan Policies

- 3.1 The Site is already subject to the policies set out within the 'Local Plan (Part One) Strategic Policies' (adopted 29th January 2015) and the 'Local Plan (Part Two) Land Allocations and Detailed Policies' (adopted 18th July 2019). The Local Plan covers the period up to 2030.
- 3.2 Within the adopted Local Plan, Northwich is defined as a 'town'. Policy Strat 5 sets out that Northwich is a key focus for development in the east of the District, with the provision of at least 4,300 new dwellings and 30 Ha of additional land for business and industrial development. Policy Strat 5 identifies Gadbrook Park to be retained and protected for continued employment use.
- 3.3 Policy N4 of LP2 allocated specific sites to meet the strategic requirement for new employment development and land is allocated to provide a south westerly expansion of the Gadbrook Park. Policy N4 (f) which relates to land to the south A556/south-west Gadbrook Park, which is the land outlined in blue (Site 2) and which is currently being brought forward by Stoford Developments. This allocates 19 hectares of land for uses classes B1, B2, B8, albeit the area allocated covers c. 33 hectares of land.
- 3.4 Policy N5 focuses on an area of Northwich referred to as Gadbrook Park, which is identified as an established area for employment uses, including the Gadbrook Business Park. The land to the east of the railway line (Site 1 / site reference 1402) is also identified within the policy boundary associated with Policy N5.
- 3.5 Site 1 / the land to the east of the railway line was considered at the time of the previous Local Plan to be of longer term development potential.
- 3.6 The areas mentioned above, are shown on the below figure for completeness.
- 3.7 To confirm Site 1 / the land to the east of the railway line (site reference 1402) is:
1. Situated directly south of Gadbrook Business Park.
 2. Situated within Policy N5 area, Gadbrook Park.
 3. Situated directly east of employment allocation N4 (f) (Site 2 being brought forward by Stoford Developments) and which will facilitate improved access to it.
- 3.8 Site 1, land to the east of the railway line, is therefore strategically positioned between the existing Gadbrook Business Park (to the north) and employment allocation N4(f) (to the west). The Site is situated within Policy N5 area which is recognised as an established employment area of Northwich. The Site therefore makes an appropriate new employment allocation. The Site would ensure flexibility moving forward, cater for a wide range of occupiers and create a significant clustering of economic activity to this part of Northwich.

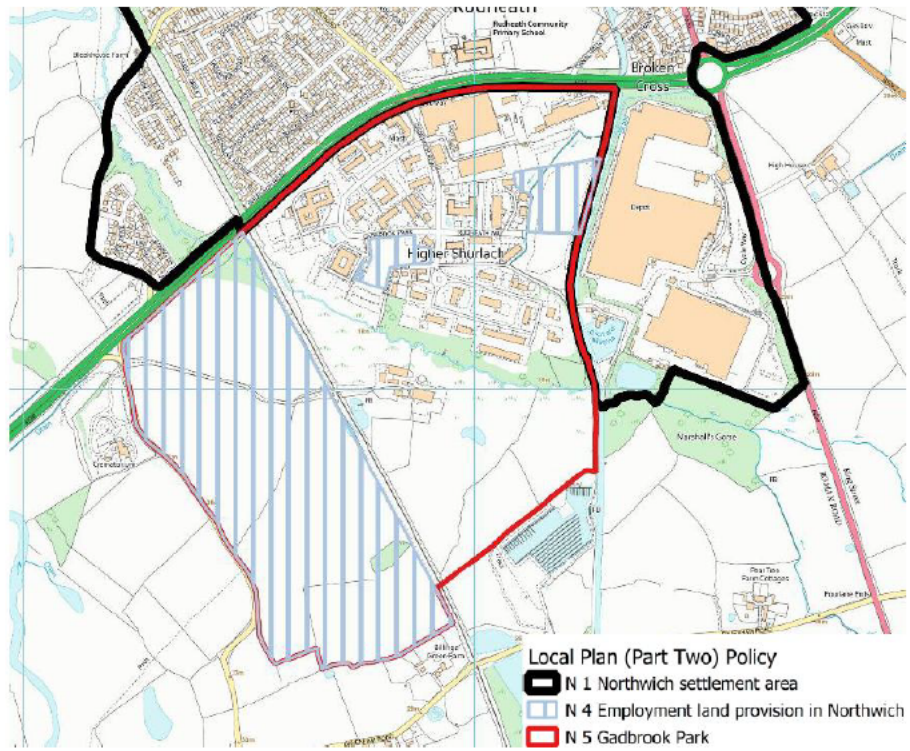


Figure 3.1: Map showing current planning policies relevant to the Site

4. Representations on the CW&C Local Plan Issues & Options

- 4.1 This section of the Representations sets out our client's position in relation to the questions posed in the Issues and Options document. Where appropriate, reference will be made to the supporting evidence published by the Council.
- 4.2 It should be noted that answers are only provided to questions that are employment land related and are pertinent to Site 1 and wider landholdings at Gadbrook Park, Northwich in so far as they are relevant (site reference 1402).

Introduction

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

- 4.3 Yes. The Council propose that the update to the Local Plan should plan for a period of 15 years.
- 4.4 Paragraph 22 of the National Planning Policy Framework (NPPF, 2024) states that 'strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery'. This is echoed in PPG Paragraph: 064 Reference ID: 61-064-20190315. We consider that the Council will need to ensure that their plan covers an appropriate period of at least 15 years following adoption.
- 4.5 The latest Local Development Scheme (LDS) (2025) suggests that the Local Plan will be adopted during 2027 at the earliest. This is ambitious. Given that the Local Plan adoption process can be prolonged, we suggest that the end date of the Plan should be kept under review to ensure that the Local Plan looks far enough into the future. Of course, the evidence base documentation will need to reflect this.

Vision

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

- 4.6 CW&C is a large and diverse District with distinct towns and settlements each of which have specific development needs. As such, the Council's approach is supported which will establish concise visions for the key settlements, in addition to an overarching vision for the whole District.
- 4.7 Local visions for each of the larger settlements (Chester, Ellesmere Port, Northwich, Winsford, Frodsham, Neston and Parkgate) will help to ensure that the specific development objectives of each settlement can be met through the Local Plan policies, which will in turn inform development proposals.

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?

- 4.8 No. The Issues and Options draft sets out that the Council's policy approach is to deliver a minimum of 1,914 new homes each year over the Plan period.
- 4.9 To ensure that the emerging Local Plan is consistent with national policy, the Council should use the Standard Method to calculate the local housing need (LHN) figure. The new method to calculate housing need uses housing stock as the starting point rather than population projection as it was felt that housing stock provides a better baseline 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*"¹.
- 4.10 Savills notes that the most recent housing need figure for Cheshire West and Chester is actually 1,928 dpa as of May 2025 affordability ratios and not the figure of 1,914 dpa as referenced within the Issues and Options consultation material.
- 4.11 **In response to question SS1, it is strongly recommended that the new Local Plan should support the delivery of 1,928 homes per year as a minimum.** The requirement for the new Local Plan to meet the Standard Method figure is clearly established in the NPPF and is the necessary approach that must be taken to ensure that the plan is consistent with national policy.
- 4.12 It must be noted that the current adopted Local Plan's housing requirement is 1,100 dwellings per annum, which is significantly below the new Standard Method of 1,928 dwellings per annum.
- 4.13 Emphasis is placed on the fact that the national policy requirement is for Local Plans to adopt the Standard Method figure as a minimum. Savills recommends that the Council should take an ambitious approach and aim to exceed the minimum housing delivery indicated by the Standard Method, in order to support sustainable growth.
- 4.14 It should be noted that this housing need figure is a minimum – it is a without constraints 'policy off' assessment of the minimum number of homes needed in an area. Assessing housing need is the first step in deciding how many homes to plan for. However, it does not directly translate to the actual housing requirement. The housing requirement is a "policy on" figure. It considers local factors, policies, and constraints to determine whether the unconstrained housing need figure can be delivered in full. However, it is the Government's clear intention that the identified housing need in an area should be met in full. The housing requirement can also exceed the minimum housing need figure to account for circumstances which include (but are not limited to) significant infrastructure or economic investment, large scale regeneration, or a new town development.

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

- 4.15 No. This is an underestimate of the likely employment Need. The Economic Needs Assessment (2025) looked at a range of methods to derive employment needs (in line with national policy and planning practice guidance): labour demand, labour supply, past take-up and/or future property market requirements. The report considers that the most robust approach is for the authority to plan for around 198 hectares of employment land to meet a range of types and sizes of site over a 20-year period, thus equating to 9.9 hectares per annum.

¹ MHCLG, Guidance on housing and economic needs assessment (February 2025), paragraph 005

- 4.16 The 193 hectares of industrial land need identified in the CW&C Economic Development Needs Assessment (2025) is derived from a sensitivity-adjusted gross completions trend, i.e. trend based.
- 4.17 The sensitivity-adjusted element relates to a small number of large developments, such as Stellantis expansion at Hooten Park (62,151sqm) and Encirc rail discharge facility (11,000sqm), which were excluded from the trend, with the report stating that this was to avoid overestimating future need. Rather than CW&C using these large developments to focus on future growth, these developments have been removed from the trend based assessment, resulting in an artificially low employment land figure of 193 Ha. In reality these developments (Hooten Park and Encirc) clearly demonstrate the unconstrained demand when sites of sufficient scale and capacity are made available.
- 4.18 Furthermore, the use of trend based assessment to arrive at the employment land need is considered flawed as it does not consider suppressed demand, which refers to the unmet or constrained demand for employment space - typically due to limitations in available land, planning restrictions, or market conditions that prevent businesses from expanding, relocating, or establishing themselves in an area. as there is now a significant supply and demand imbalance. Whilst the Economic Needs Assessment touches on these issues, by setting out examples such as limited availability of suitable sites, the only changes to the overall employment figure as a result of this was to include the margin of choice (at 10% margin) and highlighting the protection of remaining employment sites. Both of these elements should be included in any event and not as a response to suppressed demand. It is imperative that local planning authorities bringing forward new policy frameworks must accurately forecast future demand and allocate sufficient employment land. If not, the issue of suppressed demand will only worsen.
- 4.19 We however do support the inclusion of a 10% margin for forecasting uncertainty, market choice and delays to site delivery.
- 4.20 The Economic Needs Assessment identifies that there is not a single economic geography for the borough. The economic mix is extremely diverse and as such there is a need to plan for a range of different sizes and types of employment sites. The new Local Plan policy therefore must provide employment land of various scales and types across the borough alongside new housing development, enabling people to work close to where they live, ensuring this is attractive to indigenous and inward investors.
- 4.21 Comparatively, it must be noted that the current adopted Local Plan's employment land requirement is 365 hectares of land. This is over a 20 year period between 2010 and 2030, equating to over 18 hectares per annum. The proposed delivery of a minimum of 9.9 hectares per annum for the new Local Plan is therefore a significant reduction. This is also despite a significant jump in housing requirement.
- 4.22 Matching housing with employment growth is clearly in the interests of good, sustainable planning. This is to ensure that the housing requirement in the Local Plan supports the districts economic aspirations. Therefore with the increased housing numbers as a result of the new Standard Method this should correlate to a higher level of employment growth as part of the new Local Plan.
- 4.22.1 Increasingly, occupiers are wanting energy efficient buildings due to net zero commitments and high energy costs. CW&C have also set a target of 2045 to be carbon neutral. Modern buildings are typically built to such standard.
- 4.23 **In response to question SS3, it is strongly recommended that the new Local Plan should support the delivery of a higher employment figure than 9.9 hectares, instead considering a figure closer to the previous local plan of 18 hectares to ensure the new Local Plan responds positively to wider opportunities for growth and to align with housing growth.**

Question SS 4 - Do you agree with the suggested policy approach towards the spatial strategy principles, as set out in SS3 'Spatial strategy principles' above? If not please suggest how it could be amended?

- 4.24 The Issues and Options consultation document sets out that the spatial strategy will follow the principle of directing new development and allocating land towards previously developed ('brownfield') sites within settlements first. It is acknowledged that previously developed sites within settlements are often the most sustainable locations to support new development, therefore development should be directed to these locations in the first instance.
- 4.25 However, it should be noted that not all brownfield land can be considered deliverable or a reasonable alternative to undeveloped sites. A detailed consideration of the deliverability and availability of each brownfield opportunity will be required to inform the urban capacity of the District.
- 4.26 The spatial strategy principles state that where there are not enough opportunities for redevelopment within urban areas and towns, the approach will be to direct development to the edge of existing settlements in locations with the best access to public transport, services and infrastructure, as the next best sustainable option. The document also states that depending on the settlement, this may require the release of land that is currently designated as Green Belt.
- 4.27 The principles of the spatial strategy as set out in the consultation document are broadly supported. It is a fundamental purpose of the Local Plan to ensure that the development needs of the District are met and that development is directed to the most appropriate and sustainable locations.
- 4.28 While a brownfield-first approach is supported and is consistent with national policy, the scale of development that is required in CW&C and the relative lack of appropriate previously developed sites, means it will be essential for development to be directed to other sites on the edge of existing settlements. For example, land within the Gadbrook Park area (Policy N5), Northwich is considered an appropriate area for additional employment development.

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

- 4.29 The Issues and Options document proposes that the new Local Plan will set out a settlement hierarchy based on the status and role of each settlement. The proposed settlement hierarchy is as follows:
- City – Chester
 - Main Towns – Ellesmere Port, Northwich, Winsford
 - Market Towns – Neston and Parkgate, Frodsham
- 4.30 Our client agrees with the suggested settlement hierarchy as set out above. Chester is the only City within the District and therefore performs a principal function and should be placed at the top of the settlement hierarchy.
- 4.31 The second tier of the proposed settlement hierarchy includes Ellesmere Port, Northwich and Winsford as 'Main Towns'. The inclusion of Northwich specifically as a 'Main Town' is endorsed, since it is an established settlement in the District with clear opportunities to deliver growth alongside housing and employment development. Northwich should continue to include satellite settlements, such as Weaverham, for the purpose of planning policy.
- 4.32 Northwich is a desirable location for development and is able to accommodate further growth through the new Local Plan. This should be reflected in its status in the settlement hierarchy.

4.33 The consultation document sets out that the New Local Plan will include individual place-based policies for each settlement which will set out the vision, core features, key issues and clear strategy for what development will take place in each settlement. The place-based policy is supported in principle as this will add clarity in terms of the expectations of the Council for each settlement area.

Question SS11 - Please select the option which is the most appropriate spatial strategy for Cheshire West and Chester:

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

4.34 The most appropriate spatial strategies for CW&C are Options B and C above. For the reasons outlined above, namely to ensure the Local Plan is ambitious and plans to deliver sufficient housing and employment land.

4.35 While Savills recognises the prioritisation of previously developed land for housing development, there is not a sufficient supply of available and viable previously developed land in urban areas that is capable of accommodating the development requirements in respect of both housing and employment needs. Green Belt and green field development will therefore be required.

Question SS21 - What information should we take into account when assessing sites for allocation in the new Local Plan?

4.36 At Paragraph 72, the NPPF makes clear that planning policies should identify 'a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability'. To ensure the new Local Plan is consistent with the NPPF, it is critical that the Council takes into consideration the availability, suitability and economic viability of proposed allocated sites.

4.37 In terms of availability, the Council should consider the ownership of proposed sites and whether sites can feasibly come forward within the Plan period. In the case of the Site to the east of the railway line (Site 1 / site reference: 1402), the land is clearly available, since it is under the control of a single landowner who is actively promoting through the Local Plan process. As such, there are no land assembly or ownership constraints that could pose a delay to development of the land. Furthermore, Site 2 (allocation N4 (f)), which is also owned by the same landowner is being brought forward by Stoford Developments. The involvement of a delivery partner further clarifies the commitment of the landowner to bring forward the wider ownership for employment uses.

4.38 When assessing sites for potential allocation, it will be important for the Council to ensure that allocated sites can realistically be delivered within the Plan period. As such, factors affecting deliverability will be a key consideration, so technical constraints, such as ecology, flood risk and topography should all be taken into account.

4.39 In terms of suitability, it is important for the Council to consider sites against the settlement hierarchy and sustainability credentials. In respect of employment land, the proximity to other employment allocations and well established employment sites would assist in a site being considered suitable.

4.40 Site 1 is therefore strategically positioned between the existing Gadbrook Business Park (to the north) and employment allocation N4(f) (to the south). The Site is situated within Policy N5 area which is recognised as an established employment area of Northwich. The Site therefore makes an appropriate new employment allocation. Please see our separate Call for Sites submission.

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

- 4.41 The Issues and Options consultation document identifies several potential 'growth areas' around Northwich at Map 5.6 (page 45). The consultation document sets out three Spatial Strategy Options, as follows: Option A – Retain the Green Belt, Option B – Follow current Local Plan level and distribution development, and Option C – sustainable transport corridors.
- 4.42 Across all three growth options, Site 1 is proposed for allocation for employment purposes and Site 2 is to remain allocated for employment purposes. The map / Plan refers to site references NOR04 and NOR05, with the former representing land to the west of the railway line and existing employment allocation N4(f) and the latter site NOR05 relates to the land to the east of the railway line.
- 4.43 The fact that all three growth options include both sites NOR04 and NOR05, confirms that both sites are considered to be suitable and deliverable employment allocations. These would make an appropriate extension to Gladbrook Business Park and which both fall within Policy N5, Gadbrook employment area.
- 4.44 We would also highlight that sites NOR04 and NOR05 are the only large employment allocations directed to Northwich, other than the small employment site at NOR03. This is despite Northwich being one of the main towns and having good connectivity to the strategic highways network with access to Junction 19 of the M6, which is a prime corridor for strategic commercial occupiers.
- 4.45 The initial stage of the LAA therefore indicates that Northwich is the preeminent location for housing delivery in the District. The estimated capacity total for Northwich (3,586 units) is the highest out of all of the urban areas. Northwich is followed by Winsford, Ellesmere Port and Chester respectively in terms of total estimated capacity for housing delivery. Given the high levels of housing distribution directed to Northwich, in conjunction there should also be sufficient employment land to align with this level of growth to Northwich.
- 4.46 We therefore fully support the draft allocation of NOR04 and NOR05 within each of the growth options for Northwich and suitable employment allocations within the new Local Plan.

Northwich

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

- 4.47 The Issues and Options document proposes that the policy approach to Northwich will reflect the objectives of the Northwich Town Centre Development Framework and Northwich Transport Strategy. The Council's intention is to retain the overall policy content of the current Local Plan (Part One) Policy STRAT 5 and Local Plan (Part Two) Policy N1 relating to development in Northwich and safeguarding the character and individuality of the settlements that form the wider built-up area of Northwich.
- 4.48 The new Local Plan will set out the level and location of new development within Northwich and the settlements which make up the Northwich urban area, including Weaverham. The new Plan will identify key sites and land allocations to deliver strategic development needs for new housing and employment.
- 4.49 The initial key allocations/policies identified in the Issues and Options consultation document are:
- Wincham Urban Village
 - Northwich Town Centre e.g. Weaver Square, Northwich Market, Barons Quarry
 - Winnington Works (TATA)

- Gadbrook Park

- 4.50 The Issues and Options document states that other sites to be identified will depend on the selected Option for the Spatial Strategy (A, B or C). In all three options sites NOR04 and NOR05 are proposed for allocation.
- 4.51 The element of the NO 1 Policy that seeks to identify key sites and allocations for housing development in Northwich is supported. As stated above, Northwich will play a primary role in accommodating new housing and employment development in the new plan period and directing this development to a mix and variety of sites as part of the Northwich policy is essential to ensure delivery.
- 4.52 We also support the specific reference to Gladbrook Park as one of the key allocations/policies, with specific consideration to employment development. We comment further in respect of Gladbrook Park in our response to NO 2, below.

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

- 4.53 We support NOR04 and NOR05. These draft allocations follow on from Policy N5 of Local Plan Part 2 which is identified as an established area for employment uses, including the Gadbrook Business Park.
- 4.54 In terms of NOR04, this follows on from adopted Policy N4 (f) which relates to land to the south A556/south-west Gadbrook Park (Site 2). This employment site was allocated within the current development plan and is being brought forward by Stoford Developments with a planning application imminent.
- 4.55 NOR05 relates to Site 1 / land to the east of the railway line (site reference 1402). This site is also identified within Policy N5. Site 1 was considered at the time of the previous Local Plan to have longer term development potential.
- 4.56 We therefore support draft policies NOR04 and NOR05.

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

- 4.57 The Local Plan (Part One) defines Northwich (under Policy STRAT 5) as *'the town of Northwich and adjacent settlements of Anderton, Barnton, Davenham, Hartford, Lostock Gralam, Lower Wincham, Rudheath and Weaverham.'* The settlements surrounding Northwich town, including Weaverham, make a significant contribution to the character of Northwich as a whole.
- 4.58 In the context of housing delivery, the settlements surrounding Northwich town will play a key role in contributing to the homes that are needed in Northwich. As such, those settlements should be retained as part of Northwich in the relevant policy of the New Local Plan.

Question NO 7 – Do you agree with the suggested policy approach towards Gadbrook Park, as set out in NO 2 'Gadbrook Park' above? If not please suggest how it could be amended?

- 4.59 Yes. Within the Issues and Options consultation document the policy wording at NO 2 confirms that Gadbrook and the surrounding area will be safeguarded and retained for employment uses. This is fully supported. The policy approach states that the acceptable uses would fall within use classes E(g), B2 and B8. We provide our comments in respect of use classes within our response to Question NO 8, below, to ensure sufficient flexibility moving forward.
- 4.60 The Policy approach set out at NO 2, also includes a specific section on 'land to the south-east of Gadbrook Park, which is currently allocated under existing policy N4(f) (Site 2). We note that there is a continued requirement to produce a Development Brief to address development management

considerations, such as access, landscape and design. We understand the Brief is close to being agreed and therefore suggest this is referenced in the Policy.

Question NO 8 - Should there be a more flexible approach to uses supported within Gadbrook Park?

- 4.61 To ensure flexibility moving forward and to cater for a wide range of occupiers we support a more flexible approach to uses within Gadbrook Park. The current policy position and proposed policy position restricts the uses to those that fall within use classes E(g), B2 and B8.
- 4.62 We note that within the existing Gladbrook Business Park, two of the large buildings which were formerly occupied by Barclays are now vacant and have a pending planning application (under 24/03256/FUL) for the change of use from office to an independent school (Use Class F1). This use therefore falls outside of the limited uses classes which are currently considered acceptable at Gadbrook Park. The independent school provision would however be likely to be considered appropriate and would not prejudice the existing employment uses at the site. Therefore to allow for flexibility moving forward, we support a suitably worded policy to allow for other uses.
- 4.63 As an example, such a planning policy could follow Policy EC1: General Employment Land of the Leeds Core Strategy, whereby there is a focus for warehousing uses, but part b, provides a degree of flexibility for considering alternative uses that have similar locational requirements and would be considered acceptable in general employment sites. Extract of adopted policy EC1 below.

POLICY EC1: GENERAL EMPLOYMENT LAND

- (A) General employment land will be identified, in the first instance, to meet the identified need for land to accommodate research and development, industry, warehousing and waste uses over the plan period (as identified in Spatial Policy 9) including a margin of choice for the market by:
- (i) Carrying forward existing allocations and other commitments that have been assessed to be suitable, available and deliverable for general employment use or,
 - (ii) Identifying new allocations of general employment land to address deficiencies in the existing supply over the District and within local areas in the following locations, subject to the suitability, availability and deliverability of that land:
 - In accessible locations within the Main Urban Area, Major Settlements and Smaller Settlements; including sites with good access to the motorway, rail and waterways networks,
 - Within regeneration areas identified in Spatial Policy 4,
 - Within established industrial areas,
 - Within urban extensions linked to new housing proposals to help deliver sustainable mixed use communities,
 - (iii) Phasing the release of the land consistent with the overall strategy for major regeneration and housing growth,
 - (iv) Identifying freight storage/distribution opportunities as part of the overall employment land requirement set out in Spatial Policy 9. The site search will be focused in the following locations:
 - Along rail corridors, particularly in the Aire Valley,
 - Along the Aire and Calder Navigation.
- (B) Other uses (i.e. sui generis) with similar locational requirements to the employment uses set out under (A) which are generally less well suited to locating in centres, residential areas or other environmentally sensitive areas are acceptable on general employment sites.

4.64 The above policy, specifically part B) allows the consideration of alternative uses that are considered acceptable in employment sites.

4.65 We therefore consider that any future policy should provide more flexibility to reflect a broader number of uses that can be considered acceptable in a predominately employment led location.

Economic Growth, Employment and Enterprise

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

4.66 The Issues and Options document proposes at EG 1 that the Council will “*promote sustainable economic growth in the borough and wider sub-region, supporting existing businesses, encouraging indigenous business growth and attracting new inward investment. The creation of new job opportunities across a range of sectors will be supported*”. This approach is generally supported.

4.67 The Council should however strive to be ambitious in terms of the growth agenda of the new Local Plan in both housing numbers and employment land to meet future residential and employment needs. This should build on from CW&C’s robust and resilient economy that has seen growth over the last decade.

4.68 EG 1 further sets out the need for a flexible supply of employment land needs across the District to cater for a range of types and size of business. This approach is also supported. The Economic Needs Assessment (2025) confirms that the District has a range of strengths, with particular strengths referenced as energy and nuclear, environmental technologies, advanced manufacturing and engineering and automotive sectors. The Economic Needs Assessment also references to a District with distinct areas which have their own employment markets, reiterating the importance of ensuring that a wide range of types and sizes of businesses are considered within the employment strategy of the new Local Plan.

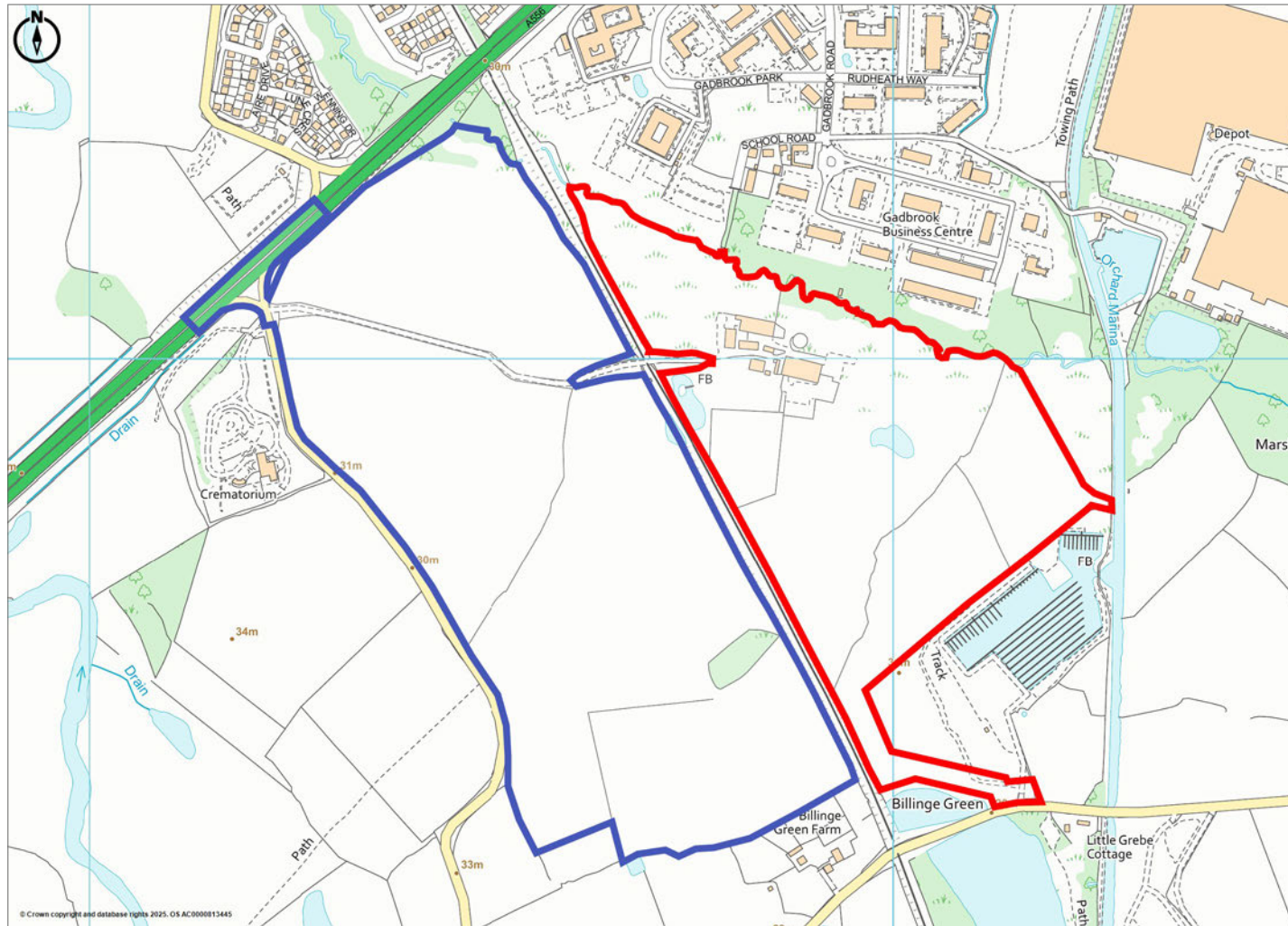
4.69 EG 1 clarifies that “*additional locations for economic use may be identified on the edge of settlements, dependent on the chosen plan strategy*”. This is fully supported. A prime example of this is Site 1. The Site is strategically positioned between the existing Gadbrook Business Park (to the north) and employment allocation N4(f) (to the south). The Site is situated within Policy N5 area which is recognised as an established employment area of Northwich. The Site therefore makes an appropriate new employment allocation. The Site would ensure flexibility moving forward, catering for a wide range of occupiers and creating a significant clustering of economic activity to this part of Northwich.

5. Summary and Conclusion

- 5.1 Savills (UK) Limited ('Savills') is instructed by Michael and Amanda Vernon to submit representations on the Issues and Options (Regulation 18) draft of the Cheshire West and Chester Council Local Plan ('New Local Plan').
- 5.2 Our client is supportive of the Council's decision to prepare a new Local Plan and welcomes the opportunity to engage with this, and future consultations.
- 5.3 In general the Council is encouraged to be ambitious. This is both in terms of addressing the current housing crisis, ensuring sufficient employment land and facilitating sustainable development.
- 5.4 It is strongly recommended that the new Local Plan should support the delivery of a higher employment figure than 193 hectares (or 9.9 hectares per annum) , instead considering a figure closer to the previous local plan of 365 Ha (18 hectares per annum) of employment land to ensure the new Local Plan responds positively to wider opportunities for growth and to align with housing growth.
- 5.5 We support the draft allocations NOR04 and NOR05 contained within the Regulation 18 Local Plan.
- 5.6 Northwich should continue to be a focus for development moving forward and should build on from the existing Gadbrook Business Park to allocate more employment land in this location to create a significant clustering of economic activity to this part of Northwich. Employment allocations should have a degree of flexibility in terms of use classes, especially in larger areas, which are likely to cater to a range of occupiers and therefore policies should be sufficiently flexible.
- 5.7 We welcome the opportunity to maintain engagement in the preparation of the new Local Plan and would be happy to discuss any of the points raised within these representations.

Appendix A – Location Plan

Location Plan - land east of the railway line, Northwich



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Promap
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