

Cheshire West and Chester Local Plan (Regulation 18) Consultation Response

On behalf of the Manchester Ship Canal Company Ltd (MSCC),
Part of Peel.

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1. Executive Summary

- 1.1. The Manchester Ship Canal Company Ltd (MSCC) submits this response to the Cheshire West and Chester Local Plan (Regulation 18) consultation, emphasising the strategic importance of the Manchester Ship Canal as a nationally significant freight corridor and economic asset. The response highlights the Canal's role in supporting sustainable transport, economic growth, and carbon reduction, and calls for its recognition and safeguarding throughout Local Plan policies and spatial strategies.
- **Strategic freight corridor recognition:** The response recommends including a specific sustainability appraisal sub-objective to promote multimodal freight transport utilising the Manchester Ship Canal, ensuring waterborne freight is integrated into development proposals where viable.
 - **Policy integration across themes:** It suggests embedding references to the Canal within climate change, transport and infrastructure, and economy and employment policies to highlight its role in decarbonisation, sustainable transport hierarchy, and supporting investment and job creation.
 - **Support for safeguarding canal operations:** MSCC advocates for strengthening policies like DM 38 to safeguard the Canal's operational capacity as a strategic freight corridor, preventing incompatible development and requiring proposals to consider waterborne freight opportunities.
 - **Recognition of multimodal potential in employment allocations:** The Former Booston Oil Depot allocation near the Canal should explicitly require maximising non-road transport modes, including canal access, to align with national policies on safeguarding wharves and promoting modal shift.
 - **Inclusion of National Policy Statement for Ports:** MSCC requests that the National Policy Statement for Ports (2012), or the updated version currently being prepared (depending on its status at the time of the Local Plan adoption), be referenced as a material consideration in the Local Plan to reflect the Canal's national and regional strategic importance.
 - **Spatial strategy alignment:** Among the three spatial options for growth, Option C, focusing on sustainable transport corridors, is aligned with the Canal's role, but the Canal should be explicitly promoted as a strategic sustainable transport corridor with safeguarded infrastructure to support modal shift and reduce carbon emissions regardless of which spatial option is carried forward
 - **Economic and environmental benefits:** The Canal is recognised as a key driver and enabler of economic activity in Cheshire West and Chester, underpinning industrial clusters and offering lower-carbon freight alternatives that support local prosperity and attract investment.
 - **Ongoing engagement and support:** MSCC supports the Council's proactive approach in plan-making and welcomes continued collaboration to maximise the Canal's economic, environmental, and sustainability contributions as the Local Plan develops.

2. Introduction

- 2.1. Pegasus Group has been instructed to respond to the consultation on behalf of The Manchester Ship Canal Company Ltd (MSCC), part of Peel Ports Group. MSCC has substantial land and port assets within the Cheshire West and Chester area which are of strategic importance. These representations follow from the previous consultation response provided by Pegasus Group on behalf of MSCC relating to the Local Plan evidence base in March 2024.
- 2.2. The Local Plan Issues and Options document is the first stage in preparing a new Local Plan. It does not allocate sites but asks questions about how much growth there should be, where it should go, and what policies are needed.
- 2.3. A map showing the land titles owned and leased by MSCC that are relevant to these representations is included as Appendix 1.

The Role of the Manchester Ship Canal in the Cheshire West and Chester Economy

- 2.4. The Manchester Ship Canal is a nationally significant piece of infrastructure which plays a vital role in supporting the economy of Cheshire West and Chester. Stretching from the Mersey Estuary at Eastham through to Salford, the Canal provides a strategic freight corridor that directly serves the borough's key employment areas, industrial clusters, and logistics hubs. Its presence underpins the competitiveness of the sub-region, offering multi-modal connectivity between shipping routes, the regional rail network, and the motorway system.
- 2.5. Within Cheshire West and Chester, the Canal is both a driver and an enabler of economic activity. It supports port and wharf operations, facilitates the efficient movement of bulk materials, fuels, and manufactured goods, and provides businesses with cost-effective and lower-carbon alternatives to road transport. The Canal's contribution extends beyond freight handling: it underpins the borough's industrial base, supports high-value employment, and helps to attract investment by offering infrastructure capacity that is unique within the North West.
- 2.6. The Manchester Ship Canal also aligns with wider policy objectives, including decarbonisation of the freight sector, resilience in supply chains, and the delivery of sustainable growth. Its safeguarded wharves and associated landholdings form part of the essential infrastructure required to meet national and regional priorities for modal shift and climate change response, while continuing to underpin local prosperity. As such, the Canal must be recognised as a strategic economic asset within the Local Plan, with policies that protect and enhance its operational role for the long term.
- 2.7. National planning policy is clear that local authorities should safeguard existing, planned and potential sites for wharf and port infrastructure to ensure their long-term availability for sustainable transport and freight movement (NPPF para. 105 & 106). Recognition of the Manchester Ship Canal's strategic role within the Cheshire West and Chester Local Plan is therefore essential to demonstrate consistency with the NPPF, and to enable the borough to maximise the economic and environmental benefits of this nationally important waterway.

3. Consultation Response

- 3.1. These comments are provided following review of the Local Plan Issues and Options (Regulation 18) document and the Sustainability Appraisal (SA). The intention is to provide constructive feedback to help achieve a Local Plan that best delivers the vision and objective of all stakeholders.
- 3.2. MSCC is generally supportive of CWaCC's existing development plan and acknowledges the work that has gone into producing the latest documents for consultation. MSCC provided separate comments relating to the evidence base in March 2024, including the Employment Land Survey, Places Background Paper, and Land Availability Assessment and Call for Site. This consultation response builds upon previous comments and therefore should be read alongside the previously submitted representations.
- 3.3. The previous consultation response was generally supportive and sought to ensure the strategic economic importance for MSCCs assets was recognised within the new Local Plan.
- 3.4. In summary, previous comments suggested that for the Local Plan to align with national policy requirements, it should:
 - Safeguard existing and potential wharves and canal-side land for freight and port-related activity.
 - Resist proposals for non-port-related or incompatible development which could prejudice current or future operational capacity of the Canal, being mindful of the agents of change principle.
 - Support investment in canal-related infrastructure to enable greater use of waterborne freight and enhance multi-modal connectivity.
 - Promote modal shift and decarbonisation by recognising the Canal's role in reducing HGV movements and cutting carbon emissions.
 - Embed the Canal within strategic growth and employment policies, ensuring its contribution to the borough's economy and inward investment offer is fully recognised.
 - Work proactively with the Manchester Ship Canal Company and wider stakeholders to maximise the economic, environmental and sustainability benefits of the Canal.
- 3.5. The purpose of these representations is to ensure the ongoing operational activities and future ambitions of MSCC's interests are safeguarded as part of any future development plan preparation.
- 3.6. On this basis, and due to the significant port interests within the Borough, it was also recommended that CWaCC should include reference to the National Policy Statement for Ports (2012) as a material consideration when undertaking the Local Plan review, in addition to the government guidance already referenced in the consultation documents. Neither the Local Plan Issues and Options (Regulation 18) document nor the Sustainability Appraisal reference the National Policy Statement for Ports.



National Policy Statement for Ports (January 2012)

- 3.7. In March 2023, the government announced a review of the National Policy Statement for Ports under the provisions of the Planning Act 2008. This review will include a thorough examination of the modelling and forecasts that support the statement of need for development, and the environmental, safety, resilience, and local community considerations that planning decisions must take into account.
- 3.8. Consultations took place in June and July 2025, but the review has yet to conclude and therefore the National Policy Statement for Ports (DfT 2012) (NPS) remains in place and carries full weight. It is part of the planning system established under the 2008 Act to deal with nationally significant infrastructure proposals. It provides the framework for decisions on proposals for new port development.
- 3.9. It emphasises the essential role of ports in the UK economy. It notes that for an island economy, there are limited alternatives available to the use of sea transport for the movement of freight and bulk commodities and that shipping will continue to provide the only effective way to move the vast majority of freight in and out of the UK, and the provision of sufficient seaport capacity will remain an essential element in ensuring sustainable growth in the UK economy.
- 3.10. The strategic importance of port facilities, such as the Manchester Ship Canal, is recognised at a national and regional level. This strategic importance must also be recognised at a local level through the development plan.
- 3.11. Accordingly, MSCC wish to emphasise and repeat the request for reference to be made to the NPS as the new Local Plan progresses.

Spatial Strategy Options

- 3.12. The Regulation 18 consultation outlines three spatial distribution options for future development:
- Option A: Retain Green Belt
 - Option B: Follow existing distribution patterns
 - Option C: Focus on sustainable transport corridors
- 3.13. It is noted that all options are capable of accommodating at least 29,000 new homes and 149 hectares of employment land. Option C, which focuses on sustainable transport corridors, aligns most closely with the Manchester Ship Canal's role as a low-carbon, resilient freight route. However, the draft consultation does not explicitly reference the Canal within these options. This represents a missed opportunity to recognise and embed its role in delivering sustainable growth.
- 3.14. Accordingly, it is suggested that in the description of Option C (and subsequent preferred strategy), CWaCC should include the following text:
- "The Manchester Ship Canal will be recognised and promoted as a strategic sustainable transport corridor. Its wharves and associated infrastructure will be safeguarded to support*

modal shift, reduce carbon emissions from freight, and underpin the borough's industrial and employment base."

Local Plan Issues and Options Regulation 18 Consultation Document – Policy Comments

- 3.15. The key policies relevant to MSCC's interests are Policy DM 38 – Waterways and Mooring Facilities (from the adopted Part Two Plan, carried forward into the Issues & Options), and Policy EP 2.C – Former Booston Oil Depot Allocation
- 3.16. Policy DM 38 supports development adjacent to waterways where it contributes to regeneration, respects local character, and safeguards structural and operational integrity of the waterway. Importantly, it explicitly acknowledges the Manchester Ship Canal as an important commercial waterway and a Statutory Harbour Authority, noting that public access is restricted
- 3.17. The policy provides a foundation to argue that canal-side development must not undermine canal operations. However, the policy is framed largely around environmental, recreational, and regeneration benefits. It should be strengthened to safeguard the Canal's operational capacity as a freight corridor and prevent incompatible development that could prejudice its long-term role.
- 3.18. Accordingly, it is suggested that the wording amendment is made to the wording of Policy DM 38 by adding the following clause:
- "Development proposals adjacent to, or affecting, the Manchester Ship Canal must safeguard its role as a strategic freight corridor and Statutory Harbour Authority. Proposals should not prejudice existing or potential wharf operations and should demonstrate how opportunities for waterborne freight transport have been considered and, where feasible, secured."*
- 3.19. The Former Booston Oil Depot Allocation (Policy EP 2.C) is adjacent to the Manchester Ship Canal. It is allocated for employment uses (B1, B2, B8 – noting the policy was adopted prior to the changes to the Use Class Order and introduction of Class E). The policy requires proposals to be accompanied by a transport assessment and to maximise non-road modes of transport
- 3.20. The explanation accompanying the policy highlights the site's multimodal potential—including reinstating a rail freight link and canal access—as part of the Port Wirral area in the draft Mersey Ports Masterplan. This illustrates the recognition of canal-linked freight infrastructure as part of strategic employment growth.
- 3.21. The recognition of the site's multimodal potential, including canal access, is welcomed. This should be made explicit as a requirement, not just an option, to align with national policy on safeguarding wharves and promoting modal shift (NPPF paragraphs 105–106).
- 3.22. Accordingly, any update or replacement of Policy EP 2.C should include the following supporting text:
- "Proposals should be designed to maximise the potential for multimodal freight transport. Given its location adjacent to the Manchester Ship Canal, applicants will be expected to*

demonstrate how waterborne freight movements have been integrated into development proposals, unless it can be robustly demonstrated that this is not viable.”

- 3.23. Alongside the above-mentioned amendments to specific policies, in order to ensure the Canal’s role is woven throughout the Local Plan, references should be added under:
- **Economy & Employment policies** (recognising the Canal as critical infrastructure supporting investment and job creation).
 - **Transport & Infrastructure policies** (positioning the Canal as part of the sustainable transport hierarchy).
 - **Climate Change policies** (highlighting modal shift from road to waterborne freight as a key decarbonisation measure).

- 3.24. Suggested general wording that could be used within the vision and/or objectives section of these policy areas within the emerging Local Plan could be as follows:

“The Local Plan recognises the Manchester Ship Canal as a nationally significant piece of infrastructure and a strategic economic asset for Cheshire West and Chester. The Canal will be safeguarded and enhanced to ensure its continued role in supporting the local economy, delivering sustainable freight transport, and contributing to carbon reduction and supply chain resilience.”

Local Plan Issues and Options Sustainability Appraisal

- 3.25. While the SA includes broad sustainability themes such as infrastructure and economic growth, there is currently no clear reference to the Manchester Ship Canal as a strategic freight corridor within the appraisal criteria. It is therefore recommended that the document includes a specific SA sub-objective such as:

“Support for safeguarding and enhancing strategic freight water corridors (specifically the Manchester Ship Canal) to provide a resilient, low-carbon freight network and economic infrastructure.”

- 3.26. This addition would ensure the Canal’s multifunctional value is systematically assessed across all options and policies.
- 3.27. In the appraisal of Spatial Strategy Options A–C, it is suggested that the Council explicitly evaluates how each spatial approach supports the Canal’s modal shift potential and contributes to sustainable freight movement. Option C (focused on sustainable transport corridors) should be appraised positively in this regard.
- 3.28. It is also suggested that policy approaches—particularly those related to transport, employment allocations, and canal-side development—be appraised for their alignment with safeguarding canal operations and promoting waterborne freight. This would reinforce the strategic status of the Manchester Ship Canal across multiple Local Plan themes.

4. Conclusion

- 4.1. The Manchester Ship Canal Company Ltd (MSCC) supports the proactive approach of Cheshire West and Chester Council (CWaCC) in producing a new Local Plan. The port and maritime industry has significantly contributed to the spatial development of the region for centuries and will continue to play a strategic role in its future development. It is therefore welcome that the importance of this role is recognised at this early stage of the review.
- 4.2. These representations have set out how the strategic importance of the Manchester Ship Canal can be recognised within the new Local Plan. Suggested policy wording has been provided to ensure the safeguarding of canal-side land for port-related activities and to inform the assessment of non-port-related developments that could impact the Canal's operations.
- 4.3. The objective to support investment in waterborne freight and connectivity whilst also seeking to reduce HGV movements and cut carbon emissions is supported. There is an opportunity to better recognise the Canal's contribution to the borough's economic growth and maximise the economic and environmental benefits as the Local Plan progresses. MSCC and Pegasus Group welcome the opportunity to discuss these matters further and will continue to positively engage in the plan-making process.



Appendix 1: Manchester Ship Canal Company Ltd Freehold and Leasehold Interests Map

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

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