



Cheshire West and Chester Local Plan

Representations to Issues and Options (Regulation 18) Consultation
On Behalf of Views (Holdings) Limited

August 2025

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Appendix I Site Location Plan

Document Details

Report title: Planning Statement

Prepared by: LM

Status: Final

For and on behalf of AshtonHale Limited

1. Introduction

- 1.1 Cheshire West and Chester Council ('CWaC', 'the Council') is preparing a new Local Plan for the borough which will set out how development and growth will take place. The new plan will create a single local plan document that updates and replaces all policies in the current Local Plan (Part One) and Local Plan (Part Two). These representations have been prepared by AshtonHale Ltd ('AshtonHale') on behalf of Views Holdings Limited ('Views') in response to the Council's Regulation 18 Local Plan Issues and Options 2025 consultation.
- 1.2 These representations are of particular relevance to Views' interest at Land off London Road, Davenham ('the Site', 'Land off London Road'). A plan showing the extent of this site is attached at **Appendix I**.
- 1.3 These representations made on behalf of Views intend to cover the following:
- Background to Views' interest in the Issues and Options consultation and its representations; and,
 - Responses to the questions posed within the 'Issues and Options (Regulation 18)' consultation document.

2. The Site and Background to Representations

- 2.1 Views (Holdings) Limited ('Views') is a property development company focused on investment and creating spaces with a strong sense of community. Established in 2018, Views specialises in revitalising and repurposing properties to breathe new life into them. The company has a solid track record of delivering impactful housing developments throughout Manchester and the North-West.
- 2.2 Land off London Road, Davenham extends to c. 3 hectares and is located to the east of London Road and north of the access road that runs to Davenham Hall Nursing Home. It is immediately adjacent to the built form of Davenham, a village located c. 2.8km south of Northwich and within Northwich's settlement boundary. The site is bounded by residential development on the western and northern boundaries. To the south lies the grounds of Davenham Hall Nursing Home and further residential development.
- 2.3 The Site forms part of 'Site 0886 - Land to rear of 485 - 501 London Road, Davenham' as referenced in the Land Availability Assessment (2025) that forms part of the evidence base documentation. The assessment concluded that the Site was suitable for residential development.
- 2.4 Views' site is within a sustainable location, immediately adjacent to Davenham with access into Northwich, and the local services and facilities contained therein. The site provides a logical location for a residential development allocation.
- 2.5 The remainder of these representations set out Views' view on the Issues and Options presented in the consultation document, in the context of the above.

3. Cheshire West and Chester: Local Plan Issues and Options (Regulation 18)

- 3.1 Cheshire West and Chester Council is preparing a new local plan for the borough, and as part of that process, comments are invited on the priorities and issues that the new Local Plan should address and how the new plan can influence this. The Council have published the 'Local Plan Issues and Options (Regulation 18)' document, dated July 2025, which sets out a number of questions to understand the public's views on the key planning issues and priorities facing the area.
- 3.2 Views has prepared these representations to provide observations on questions posed by the Council within the consultation document. We respectfully request that these representations are considered in the next stages of preparing the Cheshire West and Chester Local Plan.
- 3.3 Views has not commented on every question set out in the document, only those considered particularly relevant to their interests in Cheshire West and Chester ('CWaC'). The absence of comment to any other question should not be construed as Views agreeing with the approach and Views reserves the right to comment on those matters as the Plan progresses.

4. Issues and Options: Introduction

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

- 4.1 Views are supportive of the concept of shorter local plan periods which ensure that policies and supporting evidence within Development Plans are kept up-to-date and remain relevant. Policies in the plan should reflect current and short-term future growth in the area in order to better guide and inform planning proposals and planning decisions. A shorter plan period will allow for more frequent reviews and updates, ensuring that the policies and data reflect the changing economic, environmental and social positions of the borough.
- 4.2 By creating shorter plan period, the new Local Plan will further align with the Government's intentions at reducing local plan review periods. Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review local plans at least once every 5 years from their adoption date to ensure that policies remain relevant and effectively address the needs of the local community. Most plans are likely to require updating in whole or in part at least every 5 years¹. A shorter plan period will allow for more realistic targets to be set within the document, ensuring more accurate monitoring in the progress and success of the Local Plan policies.

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.

- 4.3 It is recognised that Neighbourhood Plans can play a useful role in guiding development and design matters in certain locations however, their role in meeting broader development needs should be limited. Neighbourhood Plans should not be used to constrain housing delivery or introduce restrictive policies outside of the adopted Local Plan. Neighbourhood Plans should be advisory in nature and confined to matters of local character, design preferences etc.

¹ NPPG Paragraph: 062 Reference ID: 61-062-20190315

4.4 Planning Practice Guidance (Paragraph: 044 Reference ID: 41-044-20190509) confirms that neighbourhood plans must be in general conformity with strategic policies.

5. Issues and Options: Vision

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

- 5.1 Views recognises that to achieve sustainable visions of the Local Plan, spatial strategies must be established, such as the strategic identification of Northwich to meet development needs. Views supports the inclusion of Northwich within the spatial strategy, as it represents a strategically important area for both new development and regeneration.

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?

- 5.2 The vision of the Local Plan should include a set of principles and priorities to allow for sustainable development to be established. Views broadly supports the draft visions as set out in section VI 1 'Visions' and welcomes the scope of the principles identified. However, it is considered by Views that additional principles should be included within the vision to allow for Cheshire West and Chester to be a desirable and attractive place to live, work and visit, and to allow for future policies to accurately address these visions. Views put forward the following principles to be considered at the next stage of the Local Plan process:

Delivering Sustainable Growth: *Ensure development is distributed appropriately across housing and employment land to meet the needs of communities and businesses, while delivering positive social outcomes and addressing environmental sustainability.*

Meeting a Specific Housing Need: *Meet identified housing needs by delivering a mix of affordable, high-quality, and energy-efficient homes, tailored to support diverse households and changing demographic demands.*

- 5.3 Ensuring that current and future housing and employment needs are met is a crucial objective and accords with Paragraphs 61 and 85 of the NPPF which seek to "boost the supply of homes" in accordance with the Government's objectives and help to create conditions for economic growth and productivity.

Question VI3: 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?

- 5.4 Providing established visions for major settlements such as Chester, Ellesmere Port, Northwich, Winsford, Frodsham, and Neston/Parkgate allows the plan to reflect the distinct identities, opportunities, and challenges each area faces. This approach helps ensure that future development is not only sustainable and aligned with borough-wide principles but also grounded in the specific context of each place.
- 5.5 Northwich's capacity for development, combined with its connectivity advantages, positions it as an ideal location for future development. Villages within the settlement boundary, such as Davenham, should accommodate growth at a scale that is proportionate to their size and role, ensuring that development supports local services without overwhelming existing infrastructure or altering settlement character. In these cases, the considered allocation of land currently outside of the settlement boundary may be justified where it delivers logical extensions that integrate seamlessly with the village and wider transport network.
- 5.6 This is the case for Views' interests at Land off London Road, Davenham. The Site lies c. 2.8km south of Northwich, an approximate 8-minute drive to the Town Centre. The site is strategically located in proximity to a number of shops and services, as well as located close to schools and colleges, making it a sustainable location for housing delivery.

6. Issues and Options: Objectives

Question OB 1: Please select the option which is the most appropriate approach for the new Local Plan:

- *Option A - Take forward current Local Plan objectives*
- *Option B - Use the Sustainability Appraisal objectives*
- *Option C- Neither of these*

6.1 Views supports the objectives taken from the Local Plan Update 2023: Sustainability Appraisal Report which provide a comprehensive framework for bringing forward sustainable development. They support a balanced approach to environmental protection, social wellbeing, and economic growth. Views believes that Land off London Road, Davenham complies with each of the relevant objectives outlined within Option 'B', as detailed below.

- *Protect air quality where it is of a high standard and to improve it elsewhere.*
The site's proximity to Northwich, one of the borough's main towns, allows for sustainable travel options. Its location enables access to local services, reducing the need for long car journeys and helping to mitigate air quality impacts. Future development would incorporate measures to manage and minimise emissions during and after construction.
- *Reduce the emission of greenhouse gasses, in particular CO2.* By focusing development near an existing urban area, the site supports a more compact settlement pattern, helping reduce car dependency.
- *Reduce energy consumption, promote energy efficiency and increase the use of energy from renewable resources. Will it reduce energy consumption?*
Development will be subject to modern building regulations and can exceed energy efficiency standards where feasible.
- *Optimise the re-use of previously developed land and buildings.* While not previously developed, the site is located immediately adjacent to the settlement boundary of Northwich, and the existing built form of Davenham. Previously developed land in the borough is insufficient to meet all housing and employment needs, and the Council should then look to land outside of

settlement boundaries. The Site offers a logical, well-connected location for growth.

- Manage contaminated land effectively. Appropriate investigations and reports will be enclosed within any future planning application at the site to ensure that development is brought forward safely.
- Minimise the risk of flooding from all sources. Appropriate investigations and reports will be enclosed within any future planning application at the site to ensure that development is brought forward safely.
- Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place. A sensitive design approach will integrate the development into the existing Davenham landscape setting, this could include aspects such as buffers and boundary planting.
- Preserve and enhance historic assets, sites, features, areas and settings of archaeological, historical and cultural heritage importance. The site is not in proximity to any conservation areas or listed buildings.
- Protect and enhance the borough's biodiversity and wildlife habitats. The site will deliver at least 10% BNG, as required nationally. Existing features such as hedgerows or mature trees will be retained and enhanced where possible.
- Provide sufficient high quality, well designed, sustainable housing solutions to meet the range of identified needs for market and affordable housing (including housing options for older people, students, Gypsies and Travellers and Travelling Show people and self and custom house building). If brought forward for residential use, the site could deliver an appropriate mix of housing types, tenures and sizes, including affordable housing, in line with identified local needs.
- Promote regeneration, particularly of deprived areas. Development will support the vitality of Northwich and Davenham by increasing local population and thus footfall in the town / village centres.

- Create a safe environment to live in and reduce the fear of crime Design will follow Secured by Design principles.
- Enable environments that promote health and wellbeing. Future development at the site will deliver connections to local services and will support active lifestyles and mental wellbeing.
- Maintain and improve the vitality and viability of city, town and local centres. Residents or employees will use local shops and services in Davenham and Northwich, helping to maintain its role as a key town centre and increasing footfall and economic activity.
- Protect and enhance community facilities and services. The site will integrate with the wider settlement to enhance community cohesion and access.
- Make the best use of existing transport infrastructure and ensure everyone has access to high quality and affordable public transport, cycling and walking infrastructure. The site is well-located to utilise existing roads and public transport links, and its development would support enhancements to walking, cycling, and bus networks. Its location in close proximity to Northwich reduces car dependency and supports sustainable movement patterns.

Question OB 2: Do you have any alternative approaches options [sic] that you would like to suggest?

6.2 An alternative approach to delivering appropriate growth within the borough would be to designate established residential areas yet also identify undeveloped sites with potential for expansion. For example, Land off London Road represents an opportunity to deliver housing at a scale appropriate to the village's role in the hierarchy, close to local amenities and existing infrastructure. This approach ensures smaller settlements remain vibrant while avoiding excessive growth in less sustainable rural locations

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

6.3 The Local Plan objectives as outlined in Option A relate well to Views' land interest off London Road. As demonstrated below, the objectives largely relate to the characteristics and qualities of the land:

Economic

- SO2 Support a vibrant, diverse and competitive local economy that provides a range of job opportunities to support sustainable communities. The site has the potential to contribute significantly to the local economy of Davenham and Northwich. If brought forward for residential use, it can promote local and competitive spending and can help support the borough's identified housing need.
- SO4 Provide and develop reliable, efficient transport networks that support sustainable growth and improve accessibility to jobs and services. Located in proximity to Northwich, the site benefits from connectivity to existing road and public transport infrastructure. Development would enable enhancements to sustainable transport modes, including walking, cycling, and bus services, improving accessibility to jobs and services both within the town and the wider borough.
- SO5 Ensure all development is supported by the necessary provision of, or improvements to infrastructure, services and facilities in an effective and timely manner to make development sustainable and minimise its effect upon existing communities. The site can be integrated into existing infrastructure networks and offers opportunities for strategic infrastructure investment.

Social

- SO6 Promote mixed and balanced communities through the provision of a range of housing to meet market, affordable and specialist housing needs. If brought forward for housing, the site can deliver a range of homes to meet identified needs in Northwich and the wider area, including market,

affordable, and potentially specialist housing. This will help address local affordability pressures.

- SO7 Support education and skills and ensure that deprived communities have access to services and employment. Proximity to employment areas and public transport links allows opportunities for skills and employment to be developed.
- SO8 Create stronger, safer and healthier communities by enabling access to leisure, recreational and community facilities and promoting walking and cycling. Future development at the site will deliver connections to local services and will support active lifestyles and mental wellbeing.

Environmental

- SO11 Ensure new development does not create an unacceptable impact, either individually or cumulatively, on the amenity and health of residents. Careful design will ensure protection of residential amenity, air quality, and noise levels.
- SO12 Ensure new development is of sustainable and high-quality design that respects heritage assets, local distinctiveness and the character and appearance of the landscape and townscape. The site is not in proximity to any conservation areas or listed buildings.
- SO13 Manage, expand and improve green infrastructure and waterways networks, recognising their importance in delivering local environmental, social, economic and health benefits The site will be brought forward to deliver sustainable development with access to green infrastructure and waterway networks.
- SO14 Mitigate and adapt to the effects of climate change by addressing flood risk and water management and support the development of new buildings and infrastructure that are resilient, resistant and adapted to the effects of climate change. Appropriate investigations and reports will be enclosed within any future planning application at the site to ensure that development is brought forward safely.

- SO15 Take action on climate change by promoting energy efficiency and energy generation from low carbon and renewable resources. The development will meet modern energy standards.
- SO16 Achieve sustainable waste management, using sustainable modes of transport and travel and the prudent use of our natural resources including water and mineral reserves. Construction and operation will follow best practices for waste minimisation and recycling.

6.4 We believe the current Local Plan objectives (Option A) remain broadly relevant but are not sufficiently flexible to respond to evolving planning challenges, particularly in light of updated national policy and increased housing and employment land requirements. For example, areas like Land off London Road that are adjacent to existing villages may present sustainable opportunities for allocation, which the existing objectives may not fully accommodate.

Question OB 4: Do you think that objectives SO1, SO3, SO9, SO10 need to be amended if they are to be taken forward into the new Local Plan? Do you have any suggestions for how they should be amended?

SO1 Develop the role of Chester as a sub-regional city, promote regeneration and development in the towns of Ellesmere Port, Northwich and Winsford and enable appropriate levels of development in the key service centres to support sustainable rural communities.

6.5 SO1 should be updated to acknowledge the potential for sustainable growth in areas adjacent to towns, even if within current Open Countryside boundaries, especially around key towns such as Northwich.

SO9 Support sustainable development and urban regeneration by supporting the use of suitably located previously developed land and buildings and by locating the majority of development within and on the edge of the main urban areas and key service centres.

6.6 SO9 should be updated to recognise the limited availability of previously developed land, and support well-located edge-of-settlement sites, starting with Open Countryside and then Green Belt sites.

SO10 Protect the environmental quality and character of Cheshire West and Chester through maintaining the general extent and character of the North Cheshire Green Belt and Cheshire countryside.

- 6.7 SO10 should allow for flexibility in Open Countryside / Green Belt boundaries where robust evidence demonstrates that the release would deliver sustainable development outcomes without compromising the integrity of the wider countryside and Green Belt.

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

- 6.8 Yes, Views believes that Option B offers a more robust and future-proofed approach to plan-making. The SA objectives provide clear criteria for assessing the long-term sustainability and resilience of proposed development sites.

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

- 6.9 While we support Option B, we suggest enhancements to better reflect spatial considerations and site-specific viability. For example, including objectives that recognise the role of edge-of-settlement sites, and an emphasis of bringing forward sites with proximity to existing infrastructure and towns.
- 6.10 Additionally, Views believes that there is scope for the inclusion of an additional objective (or an amendment to an existing one) to reflect support for housing development to come forward to meet the identified need.

7. Issues and Options: Sustainable Development

Question SD 1: Do you agree with the suggested policy approach towards sustainable development, as set out in SD 1 'Sustainable development' above? If not please suggest how it could be amended?

- 7.1 Yes, Views broadly agrees with the suggested policy approach towards sustainable development. The proposed criteria strike a strong balance between environmental responsibility, resilience to climate change, and social inclusion.
- 7.2 However, we recommend that the policy also explicitly recognises that sustainable development can occur on well-located Open Countryside sites, particularly where they are in proximity to existing urban or commercial areas, such as the site Land off London Road, Davenham.
- 7.3 Sustainable development may, in some cases, include land currently within the Open Countryside where clear evidence demonstrates that such development would meet long-term housing and climate objectives in a manner consistent with national and local sustainability principles.

Question SD 3: Are there any other sustainable development issues or requirements that should be included in the new Local Plan?

- 7.4 Yes, the Local Plan should include a specific sustainable development requirement around proximity to existing infrastructure and services. Developments located adjacent to existing built-up areas and near public transport, employment sites, utilities, and services should be prioritised, even if these currently lie outside of the settlement boundary. The Local Plan should prioritise development of sites that are well connected, therefore reducing the need for car travel and making efficient use of utilities.

8. Issues and Options: 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?

- 8.1 The Council must plan to meet the Standard Method Requirement of 1,914 new homes per year in full as a minimum. In accordance with Paragraph 62 of the NPPF, *“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.”* There is no reason for the Council not to plan for delivering this minimum figure.
- 8.2 This figure represents a baseline figure for the Council to achieve and there is clear scope to exceed this number where justified.
- 8.3 If the Council do not feel that they can meet the Government’s housing targets within the current identified Local Plan settlements, the Council must look to bring forward sites outside of settlement boundaries for development to achieve these targets. Open Countryside sites, much like Land off London Road, are in sustainable locations and offer the Council the opportunity to achieve these housing need figures. Paragraph 73 of the NPPF notes that that planning policies should identify a supply of specific, deliverable sites sufficient to provide a minimum of five years’ worth of housing, with an appropriate buffer to ensure choice and competition in the market. The allocation of land in sustainable locations is well-placed to support this objective and contribute to a more resilient and responsive housing land supply.
- 8.4 Land off London Road, Davenham offers a logical and justified opportunity for allocation, closely related to Northwich and existing service provisions, public transport links, and proximity to centres of employment and amenities.

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

- 8.5 It is Views’ position that a stepped housing requirement should not be introduced within the emerging Local Plan due to the concerns about reducing the housing delivery across the borough in the short-term. In order to achieve the Government’s

growth agenda, Cheshire West and Chester Council should recognise the immediate need to deliver housing and accord with Paragraph 61 of the NPPF.

- 8.6 To support sustainable growth and meet local demand without delay, the Council should instead pursue a consistent and ambitious housing delivery trajectory from the outset of the plan period. This approach would also justify the allocation of sustainable and deliverable sites, such as the Land off London Road, for residential use. Unlocking such strategic sites early would support both housing delivery and economic development, aligning with the Council's wider growth ambitions.

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?

- 8.7 Views broadly support the policy approach towards the spatial strategy principles, especially the recognition that where there are not enough planning permissions and opportunities for redevelopment within urban areas and towns, the approach will be to develop on the edge of existing settlements in locations with the best access to public transport and existing services and infrastructure, as the next best sustainable option.
- 8.8 Land off London Road represents a prime example of how the allocation of Open Countryside land within the Local Plan process can help achieve development in sustainable locations, with strong access to services and facilities. The Site represents a highly sustainable, accessible, unconstrained and logical option for development that could contribute to the development requirements for Cheshire West and Chester. Roads, existing development and mature field boundaries contain the site on all sides, and it is immediately adjacent and 'in line' with the existing built form of Davenham.

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?

- 8.9 Views generally agrees with the approach taken within the outlined Settlement Hierarchy, in that development should be centred in areas with strong local infrastructure and services, such as locations identified within the consultation document i.e. Northwich. Northwich is described as a 'main town' and provides local

infrastructure and services for its large population. However, Views stress that reliance solely on the settlements listed within SS 4 (as drawn) is unlikely to address the identified housing and employment land need. To enable the annual delivery of 1,914 new homes across CWaC, the Council should consider the allocation of land in proximity to existing settlements and areas of development, bringing the sites into the settlement boundary, where sites can be served by existing infrastructure provisions and services.

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

- 8.10 Yes, all settlements should benefit from some level of development to remain sustainable. However, growth must be proportionate to each settlement's role, capacity, and infrastructure. In smaller villages, this may mean only modest infill or carefully planned extensions, while larger villages near main towns can accommodate slightly greater levels of development. This ensures that growth is distributed fairly, sustains local services, and avoids placing undue pressure on more remote rural communities.
- 8.11 A balanced distribution of growth helps to sustain rural communities, and ensures that services, facilities, and local economies remain viable. Even small-scale development in villages can help meet local housing needs, support local schools and shops, and maintain social cohesion.
- 8.12 In order to make development both sustainable and deliverable, priority should be given to settlements located near main towns. These villages are often better connected to transport networks and employment opportunities making them more suitable for accommodating growth in a way that reduces reliance on long-distance car travel. In such locations, the controlled allocation of land can provide opportunities for carefully planned development. This approach allows growth to be directed to the most sustainable locations while also relieving pressure on smaller, more remote villages that may lack services and infrastructure.

Question SS 11: Please select the option which is the most appropriate spatial strategy for Cheshire West and Chester:

- *Option A - Retain the Green Belt*
- *Option B - Follow current Local Plan level and distribution of development*
- *Option C - Sustainable transport corridors*
- *None of these*

8.13 Option B is the most appropriate spatial strategy for Cheshire West and Chester, as it allows for a realistic balance between meeting increased housing and employment needs and making selective, justified Green Belt releases in sustainable locations. This approach recognises that significant constraints on brownfield and previously allocated land exist, and that sustainable urban extensions including Green Belt release where warranted will be necessary to meet the borough's development requirements.

8.14 Views supports the approach outlined in Option B's spatial strategy, which indicates that Northwich and its surrounding area could accommodate over 5,000 new homes. This level of provision is complemented by the recognition that much of the new development under this option would need to be located within the Green Belt and/or countryside. Views agrees with this balanced and strategic approach to growth, which supports both housing and economic development in a sustainable manner.

8.15 In this context, Land off London Road, promoted by Views is a logical and sustainable extension to the existing built form of Davenham. While in the Open Countryside, it is closely related to the urban area and benefits from adjacency to existing residential uses. Therefore, a strategy that allows for planned growth in line with current distribution patterns, but with targeted allocation of land where it supports sustainable development, is the most effective and deliverable option for the new Local Plan.

8.16 Views do additionally recognise and support the spatial strategy identified under Option C whereby potential greenfield employment expansion is proposed in proximity to Northwich and this area is identified to deliver new homes.

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

- 8.17 Views recognise Option A's ambition to retain the Green Belt extent in line with Government Guidance that these boundaries should only be altered in exceptional circumstances however, for the Plan to establish a deliverable strategy it is Views' opinion that these boundaries will require readjustment. In this context, a strict adherence to retaining all Green Belt boundaries risks overlooking sustainable, well-located opportunities for employment or housing that could contribute positively to local objectives.

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

- 8.18 Option A should be amended to allow for selective Green Belt release within sustainable locations. If Option A were to be brought forward, this would raise a risk to undermining economic growth and limiting land availability. An option should be developed which promotes planned Green Belt release, having first considered Open Countryside and Grey Belt land, to meet identified housing needs.

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

- 8.19 Yes, Option B allows for planned growth in line with current distribution patterns, yet with targeted Green Belt release where it supports sustainable development.

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

- 8.20 Option C is supportable in principle however, for it to be deliverable and effective, the strategy should actively consider the selective allocation of smaller sites alongside modest urban extensions, where they are adjacent to existing development, offers strong sustainability credentials, and helps deliver wider employment and regeneration goals—as is the case with Land off London Road.

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

- 8.21 In the preparation of the new Local Plan, CWaC should consider the potential for sites to contribute towards the strategic objectives of sustainable settlement growth, along with further technical considerations.

- 8.22 Views' site is within a sustainable location, with access into Northwich, and the local services and facilities contained therein. The site provides a logical location for a residential allocation.
- 8.23 The Plan should prioritise land that is deliverable within the plan period. Sites in proximity to existing settlements with reach of services and infrastructure should be favoured, even when they are undeveloped / in the Open Countryside. This is particularly appropriate where development can contribute to housing need, such as Cheshire West's target of delivering 1,914 homes.

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

- 8.24 Out of the growth options identified, area NOR06 appears to be in the most sustainable and logical location. Views support the extent of NOR06 and importantly the inclusion of Land off London Road, Davenham within it.

9. Issues and Options: 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?

- 9.1 Views broadly support the policy approach towards Northwich including the emphasis on town centre regeneration and infrastructure improvements. This growth will be important in supporting the regeneration of the Northwich Town Centre Development Framework and in the delivery of housing and employment opportunities. This is especially important in light of increasing development pressures, limited brownfield capacity, and the need to meet higher levels of housing and employment need in a sustainable manner.
- 9.2 Views also supports the Council's intention to identify key sites and allocations in and around Northwich as part of the plan-making process. In this context, Land off London Road represents a logical and sustainable opportunity for growth, well-suited to contribute to the delivery of the Plan's strategic objectives.

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

- 9.3 Views support the suggested key sites, especially growth surrounding Northwich Town Centre. The delivery of housing and employment development within the town centre makes logical sense due to the existing built environment and proximity to existing infrastructure and services.
- 9.4 While the objectives are broadly supported, we would encourage further emphasis is placed on the role that allocating land outside of the settlement boundary can make in meeting strategic housing and employment goals. Over reliance on development in allocations such as Northwich Town Centre may result in needs not being met. Sites outside of those highlighted should also be considered, especially where they offer logical extensions to Northwich.
- 9.5 Views' site offers a sustainable, well-connected and accessible location for housing or commercial use. This site will help meet local needs, support town centre regeneration through increased footfall, and its release from the Open Countryside would not undermine the value and amenity of the wider countryside.

10. Issues and Options: 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.

- 10.1 Views support the policy approach towards the Green Belt and Countryside as set out in GB 1. Policies provided in the emerging Local Plan should reflect the most recent guidance relating to the Green Belt in the NPPF, including reference to Grey Belt land and provide reference to the anticipated Green Belt review evidence.
- 10.2 In regard to wording of the policy the Local Plan should include reference to Paragraph 148 of the NPPF, which notes:

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. However, when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should determine whether a site's location is appropriate with particular reference to paragraphs 110 and 115 of this Framework. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

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

- 10.3 Yes, the Local Plan should include separate policies for countryside and Green Belt areas, as they serve distinct planning functions and are subject to different national policy frameworks and local considerations. Maintaining two distinct policies will also improve clarity for applicants, decision-makers, and communities, especially as the new Local Plan will be a single document.

11. Issues and Options: Transport and Accessibility

Question TA 1: Do you agree with the suggested policy approach towards transport and accessibility, as set out above in TA 1 'Transport and accessibility'? If not please suggest how it could be amended?

- 11.1 Views support the view that new development will be encouraged in sustainable locations with access to services and facilities. Land off London Road represents a sustainable location which is well connected by active travel and public transport.

12. Issues and Options: 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.

- 12.1 In circumstances where developer contributions are sought, the obligation needs to allow for the consideration of viability.
- 12.2 In line with the requirements of Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended), planning obligations must be:
- Necessary to make the application acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.

13. Issues and Options: 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?

- 13.1 Views broadly supports the suggested policy approach towards housing mix and type of housing as set out within HO 1 yet believe this could be strengthened to allow for greater flexibility on a site-by-site basis, particularly in strategic or edge-of-settlement locations that could accommodate a broader range of uses.
- 13.2 In this context, Land off London Road represents a credible opportunity for sustainable residential development. The site is located on the edge of the existing settlement boundary and is adjacent to established employment uses. Its proximity to Northwich and local services, transport connections, and retail facilities enhances its suitability for a broader housing mix, particularly for older people or those needing access to services without reliance on the car.
- 13.3 We recommend that Policy HO 1 be amended to explicitly acknowledge that specialist and mixed-tenure housing opportunities may also be appropriately located on sustainable edge-of-settlement sites. This would help ensure the policy remains responsive to local context and land availability and supports inclusive, place-based growth.
- 13.4 Such flexibility would align with the NPPF's objectives around meeting diverse housing needs, making effective use of land, and planning positively for mixed-use developments that create healthy, inclusive, and vibrant communities.

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

- 13.5 While the overall intention of Policy HO2 to secure the delivery of affordable housing is supported, the policy approach should be more flexible, particularly in relation to edge-of-settlement sites that are being promoted for development in the Local Plan. It should be recognised by CWaC in the development of the Local Plan that the delivery of housing on undeveloped land can incur unexpected costs. Policy

HO2 should therefore allow for site specific viability considerations to come forward as part of any application submission.

14. Issues and Options: Green Infrastructure, Biodiversity and Geodiversity

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

- 14.1 The Local Plan should not seek to exceed the 10% mandatory biodiversity net gain requirement set out nationally. The 10% threshold, as introduced by the Environment Act 2021 represents a balanced and evidence-based standard that has been subject to national consultation, viability testing, and wide stakeholder engagement. Requiring a higher percentage locally could risk undermining development viability, and introduce delivery challenges

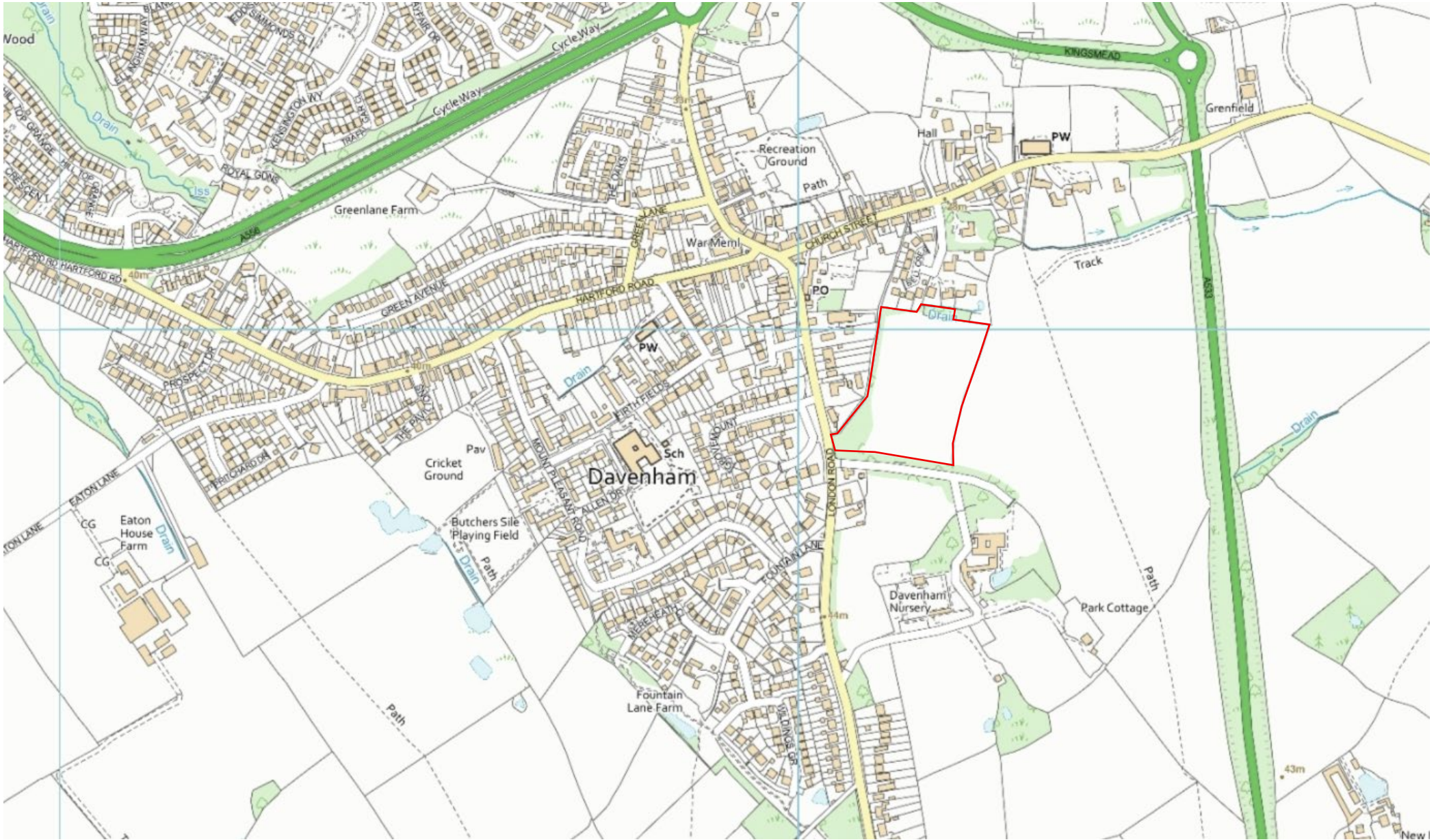
15. Issues and Options: Design and Sustainable Construction

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

- 15.1 A borough-wide Design Code should not form part of the new Local Plan. While high-quality design is critical to sustainable development, a single, overarching Design Code applied across the entire borough risks being too generic or inflexible, to the wide variation in local character across Cheshire West and Chester. Instead, the Local Plan should reference the role of design codes as supplementary guidance, allowing them to evolve over time without requiring formal plan review.

Appendix I

Site Location Plan



Site Location Plan: Land off London Road, Davenham