



# Cheshire West and Chester Local Plan

Representations to Issues and Options (Regulation 18) Consultation  
On Behalf of StanleyRed Developments Limited

August 2025

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## Document Details

**Report title:** Representations to Issues and Options (Regulation 18) Consultation

**Prepared by:** LM

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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 StanleyRed Developments Limited ('StanleyRed') in response to the Council's Regulation 18 Local Plan Issues and Options 2025 consultation.
- 1.2 These representations are of particular relevance to the StanleyRed's interest in Land at Saltworks Farm, Ship Street, Frodsham, a plan showing the extent of this site is attached at **Appendix I**.
- 1.3 These representations made on behalf of StanleyRed intend to cover the following:
- Background to StanleyRed's 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 StanleyRed have an interest in Land at Saltworks Farm, Ship Street, Frodsham ('the Site'), as depicted at **Appendix I**. The Site extends to c. 3.29 hectares and is located between the existing settlement line of Frodsham and the M56 to the north-west. The Site is currently being used as agricultural land and has a predominantly flat aspect.
- 2.2 The Site forms part of 'Site 0364 - Land at Ship Street, Frodsham' as referenced in the Land Availability Assessment (2025) that forms part of the consultation documentation.
- 2.3 The NPPF (December 2024) and Government's growth agenda seek to ensure that sufficient land is available in the most appropriate locations to increase employment and housing land supply, support growth and boost home ownership. The Site is available, suitable and achievable and is ideally positioned to deliver a residential development.
- 2.4 In accordance with the NPPF, to be considered deliverable, sites should:
- **Be Available Now:** A site is considered available where there is confidence that there are no legal or ownership problems;
  - **Be Suitable:** A site is considered suitable for development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities; and
  - **Be Achievable:** A site is considered achievable for development where there is a reasonable prospect that housing will be developed on the site within five years. This is a judgement about the economic viability of a site and the capacity of the developer to compete and sell housing over a certain period considering market factors, cost factors and delivery factors.
- 2.5 How the Site performs against the above criteria is set out below.

## An Available Site

- 2.6 The land does not have any ownership or legal impediments, and our clients are committed to bringing the Site forward for development. As such the Site would be available to be developed early in the plan period.

## A Suitable Site

- 2.7 The Site is located c. 500m from Frodsham town centre and therefore in a highly sustainable location. Frodsham railway station can be accessed from the Site in a c. 13-minute walk. The station provides services to locations such as Chester, Llandudno, Liverpool and Manchester. Regular bus services are also accessible along the A56 road (within walking distance), connecting the Site to Frodsham town centre and Chester. The M56 provides strategic transport links to locations such as Warrington (c. 24 mins), Manchester (c. 48 mins), Ellesmere Port (c. 21 mins) and Liverpool (c. 43 mins).
- 2.8 The Site lies in proximity to Frodsham Primary Academy to the east, however, further educational sites are located nearby, including Frodsham Manor House Primary School, Frodsham St Luke's Catholic Primary School and Frodsham CE Primary School. A hub of medical facilities and centres are also located in Frodsham town centre, which as above is highly accessible to the site.
- 2.9 Our assessment of the Site against the five purposes of the Green Belt (as cited at Paragraph 143 of the NPPF) is set out below:

- **Check the unrestricted sprawl of large built-up areas** -The Site is bound to the south by existing residential development; to the north by the M56; to the east by Frodsham Primary Academy School/Children's Centre; and to the west by Weaver Lane (with further residential development beyond). There are permanent and defensible boundaries surrounding the Site which would prevent any sprawl of the Site. **No contribution.**
- **Prevent neighbouring towns from merging into one another** - the Site would form a natural extension to the settlement boundary of Frodsham and does not play any function in preventing the merging of towns. **No contribution.**

- **Assist in safeguarding the countryside from encroachment** – whilst the development of any greenfield site would result in ‘encroachment’, it is not considered that the Site strongly contributes to this purpose. The defensible boundaries referenced above would limit any additional development in the future, and the release of the Site would allow development around Frodsham to be properly planned and managed. **Weak contribution.**
- **Preserve the setting and special character of historic towns** – Frodsham is not designated as a historic town, therefore the release of the Site from the Green Belt would not impact on this purpose. **No contribution.**
- **Assist in urban regeneration, by encouraging the recycling of derelict and other urban land** – The map accompanying the Land Availability Assessment shows that there are very limited opportunities for development within the main built form of Frodsham. As such, additional land outside of the settlement boundary would be required to meet identified development needs. An alteration of the Green Belt would therefore not prevent the recycling of derelict or other urban land. **Weak contribution.**

2.10 Overall, the Site makes no contribution to the purposes of the Green Belt, aside from a weak contribution purpose (c).

### **An Achievable Site**

2.11 A residential development would likely be the most viable option for this site and there is a realistic prospect that such proposals can be delivered. There are no known technical constraints that would prevent the site coming forward in a short timescale. Initial assessments suggest the Site could accommodate around 60 dwellings and an Indicative Masterplan is included at **Appendix II** to show how this could come forward.

2.12 In the context of the above, the Site represents a highly sustainable, accessible, unconstrained and logical option for Green Belt release that could contribute to the housing requirements of Cheshire West and Chester Council (‘CWaC’, ‘the Council’).

2.13 The remainder of these representations set out StanleyRed’s 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 StanleyRed 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 StanleyRed has not commented on every question set out in the document, only those considered particularly relevant to their interests in Cheshire West and Chester. The absence of comment to any other question should not be construed as StanleyRed agreeing with the approach and StanleyRed 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 StanleyRed 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 years<sup>1</sup>. 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.

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<sup>1</sup> NPPG Paragraph: 062 Reference ID: 61-062-20190315

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

5.2 In addition to the identification of key locations within the strategy, the Local Plan must also recognise areas outside of the locations identified which will be capable of delivering housing development. Areas located adjacent to the settlements identified, yet within sustainable locations, can be utilised to reduce spatial pressures of these areas.

*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?*

5.3 The vision of the Local Plan should include a set of principles and priorities to allow for sustainable development to be established. CGV 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 CGV 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. CGV put forward the following principles to be considered at the next stage of the Local Plan process:

- i. **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.*
- ii. **Creating a Prosperous Economy:** *Grow economically but sustainably, recognising our key employment sectors. Allow people and places to prosper by supporting the creation of high-quality jobs, attracting new businesses,*

*retaining and enhancing existing businesses, supporting opportunities to improve training and education and to retain skills and talent, and so providing an adaptable and prosperous economy.*

iii. **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.*

- 5.4 Given CWaC's established housing need (1,914 homes annually, a 259.8% increase from previous targets), the Local Plan must prioritise the delivery of diverse, affordable and high-quality homes. This includes recognising that sustainable residential development on well-located Green Belt sites may be essential to address the borough's housing emergency and contribute to national housing supply targets.
- 5.5 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?*

- 5.6 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.

## 6. 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?*

- 6.1 The Council is required to plan for at least 1,914 new homes per year, as identified by the Government's Standard Method for assessing local housing need. Paragraph 62 of the NPPF is clear that this figure must be treated as a minimum, informed by robust assessment, and should not be planned for at anything less. In practice, this represents a baseline that the Council must achieve, with scope to exceed it were justified by evidence of demand or opportunity.
- 6.2 Given the scale of this requirement, it is unlikely that the borough's housing needs can be met solely within existing Local Plan settlements or through brownfield land supply. In these circumstances, the Council must look to bring forward sustainable Green Belt sites to ensure delivery. Sites such as Land at Saltworks Farm are particularly well placed to support this objective. The site is accessible, unconstrained, and located adjacent to existing services and infrastructure.
- 6.3 Paragraph 73 of the NPPF further requires that local planning authorities identify a supply of deliverable sites sufficient to provide at least five years' worth of housing, with an additional buffer to ensure choice and competition. Selective Green Belt release in sustainable locations provides the most realistic way to maintain this supply and deliver a resilient, responsive housing strategy for Cheshire West and Chester.
- 6.4 Land at Saltworks Farm offers a logical and justified opportunity for Green Belt release, closely related to Frodsham 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?*

- 6.5 StanleyRed does not support the introduction of a stepped housing requirement within the emerging Local Plan, as this would risk suppressing housing delivery in the short term and failing to meet immediate needs. To align with the Government's growth agenda and in accordance with Paragraph 61 of the NPPF, the Council must

recognise the urgency of delivering new homes from the very start of the plan period.

- 6.6 A consistent housing trajectory should therefore be pursued from the outset. This would justify the early release of sustainable and deliverable Green Belt sites, such as Land at Saltworks Farm. Bringing forward such strategic sites early in the plan period would not only secure housing delivery but also stimulate economic growth, fully supporting the Council's long-term objectives for sustainable development.

*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?*

- 6.7 StanleyRed 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. Depending on the settlement, this may require the release of Green Belt land.
- 6.8 The land at Saltworks Farm represents a prime example of how the release of Green Belt land within the Local Plan process can help achieve development in sustainable locations, with best access to services and facilities. If the site were to come forward for residential development, the site is located within a sustainable and attractive location to meet needs of future residents. The site represents a highly sustainable, accessible, and logical option for Green Belt release that could contribute to the strategic requirements for Cheshire West and Chester.

*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?*

- 6.9 StanleyRed generally agrees with the approach taken within the outlines 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. Frodsham. Frodsham is described as a 'market town' and provides local infrastructure and services for its population.

6.10 However, StanleyRed stress that reliance solely on the settlements listed within SS 4 is unlikely to address the identified housing need. To enable the annual delivery of 1,914 new homes across CWaC, the Council should consider the release of Green Belt land in proximity to existing settlements and areas of development, where sites can be served by existing infrastructure provisions and services.

*Question SS 9: Have circumstances changed since the adoption of the Local Plan (Part One), that would now justify Green Belt release?*

6.11 Since the adoption of Cheshire West and Chester's Local Plan (Part One) in January 2015, a number of circumstantial changes have occurred which now justify Green Belt release across the borough as part of an evidence-based spatial strategy.

6.12 Firstly, the revised National Planning Policy Framework published in December 2024 provides clearer direction on the potential for local authorities to review Green Belt boundaries where fully evidenced and justified, particularly in the context of strategic planning and housing delivery.

6.13 The Government's reaffirmed ambition to deliver 300,000 homes per year at a national level, alongside changes to the standard method for calculating local housing need has placed greater pressure on local authorities to plan positively and realistically for future growth. Meeting this requirement will be extremely difficult without a strategic review of constrained land designations, including parts of the Green Belt that may no longer serve their original planning purpose. Cheshire West and Chester Council are expected to experience a significant uplift in their local housing delivery needs; since the introduction of the new standard method, Cheshire West and Chester Council will be required to deliver 1,914 homes annually- an increase from 532 homes annually under the previous standard method (259.8% increase).

6.14 In light of these evolving factors, it is appropriate for the Council to revisit the Green Belt strategy established under the previous Local Plan.

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

- 6.15 Yes, there are several key considerations that should inform the future approach to Green Belt policy within the new Local Plan to ensure it remains fit for purpose and responsive to changing national and local circumstances.
- 6.16 The introduction of the 'grey belt' concept in the December 2024 NPPF highlights the need for a more refined approach to Green Belt review. This concept recognises land within the Green Belt that is previously developed or makes only a limited contribution to Green Belt purposes and is therefore more suitable for development without undermining the overall function of the designation. Cheshire West and Chester Council now has a clear opportunity to review parcels of land, particularly those adjacent to sustainable settlements such as Frodsham, that are underutilised, visually compromised, or functionally disconnected from the wider Green Belt.
- 6.17 Grey belt land is defined within the NPPF as;
- land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development.*
- 6.18 It is our opinion that the StanleyRed's land constitutes as grey belt land in accordance with the definition provided within the NPPF. The Site does not actively contribute to purposes 'a', 'b', or 'd' defined within Paragraph 143 of the NPPF as set out in Chapter 2 and reiterated below.
- a) The Site itself is located adjacent to the existing settlement boundary of Frodsham and is a contained Site forming part of a large-built up area. The Site is bounded and constrained by built form to the east, south and further west, and bound by the M56 motorway to the north. There are permanent and defensible field boundaries surrounding the Site which would prevent any sprawl. To the north of the site lies land associated with Frodsham Wind Farm.
- b) the Site would form a natural extension to the settlement boundary of Frodsham and would not result in the merging with nearby settlements.

d) Frodsham is not designated as a historic town, therefore the release of the site from the Green Belt would not impact on this purpose.

- 6.19 While not previously developed, the site is functionally contained, influenced by major infrastructure, and contributes little to the Green Belt's strategic role. Given the scale of the borough's housing need, its release would be consistent with the grey belt provisions of the NPPF.
- 6.20 The Council should assess the quality, character, and function of individual Green Belt parcels, rather than treating the designation as a blanket constraint. Land that is previously developed, underused, or visually and functionally disconnected from the wider Green Belt may no longer contribute meaningfully to its core purposes and could be released without causing significant harm. This would allow for more strategic and sustainable growth, particularly adjacent to key service centres like Northwich, where infrastructure and transport links already exist.
- 6.21 Some areas of Green Belt have been overtaken by edge-of-settlement development or are no longer serving their intended role and may be better suited to development than to long-term protection.
- 6.22 Overall, the site makes a weak contribution to the purposes of the Green Belt and therefore would be a suitable site for release from the Green Belt to assist in meeting the development requirements of Cheshire West and Chester.
- 6.23 Additionally, the Green Belt should be considered in the context of housing delivery pressures. The Council will be required to meet its housing need, calculated via the standard method<sup>2</sup>, that cannot be met solely within existing urban boundaries. If sustainable options are exhausted within non-Green Belt locations, the plan must be prepared to justify selective Green Belt release as a means of delivering the spatial strategy.

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<sup>2</sup> NPPF, Paragraph 62

*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*

- 6.24 Option C is the most appropriate spatial strategy for Cheshire West and Chester, as it allows for the delivery of housing and employment within strategic and accessible locations across the borough. Concentrating growth in these areas ensures new development is well connected to employment, education, and services, while reducing reliance on private cars and encouraging more sustainable patterns of movement. StanleyRed support the approach outlined in Option C which is proactive in recognising the need for total Green Belt Release of sites to deliver more than 12,000 homes. Within this approach, Frodsham and its surrounding area is set to accommodate between 1,500-3,000 new homes.
- 6.25 In the case of Frodsham, Land at Saltworks Farm represents this type of opportunity. The site is located adjacent to the settlement edge, within walking distance of Frodsham town centre and public transport connections, and immediately south of the M56 corridor. This strategic position means the site is highly accessible both locally and regionally, supporting sustainable commuting patterns and strengthening links to nearby service centres.
- 6.26 Delivering housing along transport corridors not only reduces infrastructure costs but also helps create resilient communities with better access to services, in line with national policy. For these reasons, we fully support this vision and consider the Site an ideal example of how it can be delivered in practice.
- 6.27 In summary, Option C is supported, or an alternative option which recognises that growth should be established through active consideration of selective release of Green Belt land where it is adjacent to existing development, offers strong sustainability credentials, and helps deliver wider residential goals, as is the case with the StanleyRed's land at Saltworks Farm located to the south of the M56.

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

- 6.28 To further the strategy outlined in Option C, further emphasis should be given the release of Green Belt land along sustainable transport corridors and at sites that adjoin established settlement boundaries. Taking forward this approach would allow strategically positioned sites to deliver required housing provisions across the borough. These sites would have existing infrastructure provisions and be located in areas with strong services and facilities for future development.

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

- 6.29 StanleyRed 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 StanleyRed's 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.
- 6.30 While Option A promotes brownfield-first principles and development within non-Green Belt settlements, a targeted Green Belt release in locations such as StanleyRed's land is likely to be essential to meeting housing needs in a sustainable way. This is particularly true given the ambitious growth requirements of the new Local Plan and the known limitations of land supply within existing urban boundaries.

*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?*

- 6.31 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 to meet identified employment and housing needs.

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

- 6.32 Option B allows for planned growth in line with current distribution patterns, yet with targeted Green Belt release where it supports sustainable development. Option B only accounts for 'relatively limited development in Frodsham', despite Frodsham being recognised as one of the borough's key towns. Further development and expansion should be located in Frodsham and other towns to accommodate the identified housing need of CWaC.

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

- 6.33 Yes, Option C is the most appropriate spatial strategy, however this option should actively consider the selective release of Green Belt land where it is adjacent to existing development, offers strong sustainability credentials, and helps deliver wider residential goals, as is the case with the StanleyRed's land at Saltworks Farm located to the south of the M56.

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

- 6.34 The three potential growth areas identified in Map 5.10 all fall outside of Frodsham's adopted settlement boundaries, within the Green Belt. Out of the three areas identified, FR003 appears to be the most suitable location for growth due to its advantageous location away from Tree Preservation Orders, SSSI's, ancient woodland, or impact on conservation area views as the land at FR001 and FR002 are. It is StanleyRed's view that the Council should seek to expand the growth location of FR003 or pursue a new growth location to include the strip of land south of the M56 to include Land at Saltworks Farm, providing a logical expansion and defensible boundary to Frodsham.

## 7. Issues and Options: Frodsham

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

- 7.1 StanleyRed generally support the principles outlined within FR 1 however, stress that additional sites (outside of those identified within the Frodsham Neighbourhood Plan) should be released for allocation through the Local Plan process. The sites included within the Neighbourhood Plan largely comprise small sites, with Site 'FRO/0010' for example only proposing the creation of one residential unit within its development. These sites are small and often constrained by conservation area designations or proximity to listed buildings. The sites selected in the development of the Neighbourhood Plan (adopted November 2024) pre-date the adoption of the 2024 NPPF and the utilisation of the new standard method, which has identified a severe housing need within the borough.
- 7.2 Further sites should be identified, outside of those within the Neighbourhood Plan, which will be able to accommodate this need- particularly sites currently in the Green Belt within proximity to existing services and infrastructure. In this context, Land at Saltworks Farm represents a logical and sustainable opportunity for growth.

## 8. 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.*

8.1 StanleyRed 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.

8.2 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?*

8.3 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.

## 9. 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?*

- 9.1 StanleyRed 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.
- 9.2 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. 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?*

- 9.3 While the overarching aim of Policy HO2 to secure affordable housing delivery is supported, the approach should incorporate greater flexibility particularly for edge-of-settlement or Green Belt release sites promoted through the Local Plan. Development on previously undeveloped land often brings additional and unforeseen costs, such as infrastructure requirements or Green Belt mitigation measures. It is therefore important that Policy HO2 allows site-specific viability considerations to be assessed at the application stage, ensuring that affordable housing requirements remain deliverable without undermining the overall viability of development.

*Question HO 8: Within this policy approach (or elsewhere) should the new Local Plan set out more detail on what development is appropriate in the Green Belt, with respect to, for example, house extensions; what is small scale/subordinate (not increasing size of a dwelling by more than 30%) etc?*

- 9.4 The emerging Local Plan should ensure that it sets out a clear criteria on what constitutes as appropriate Green Belt development in line with the 2024 version of the NPPF. Clearer definitions would provide greater clarity for applicants and decision makers. It is also important that the Plan recognise that in order to achieve sustainable development in well-connected locations, Green Belt release will be appropriate. Therefore, while detailed Green Belt guidance is welcomed, this should be balanced with a criteria-based policy that also facilitates strategic and sustainable Green Belt release where exceptional circumstances are demonstrable.

# Appendix I

## Site Location Plan



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

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Rev.	Date	Description	By	Chd
		<b>Astle Planning &amp; Design Limited</b> The Steam Mill, Steam Mill Street, Chester, CH3 5AN  <b>01244 886644</b>  info@astlepd.co.uk www.astlepd.co.uk	<b>StanleyRed</b> Developments	
<b>SHIP STREET</b> <b>FRODSHAM</b>		<b>PROPOSED</b> <b>LOCATION PLAN</b>		
Drawn by	RH	Checked by	MP	Date 20.08.25
Status	<b>PRELIMINARY</b>		Scale @ A3	1:1250
Job no.	<b>AW002</b>		Dwg.no.	<b>LP01</b>

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# Appendix II

## Indicative Masterplan



# Saltworks Farm - Frodsham

## Indicative Masterplan

OPTION 2



### DEVELOPMENT LEGEND

- GROSS DEVELOPMENT AREA - 3.29 Ha
- PROPOSED DEVELOPMENT PARCELS
- PROPOSED AVENUE
- PROPOSED STREET
- PROPOSED LANE
- PROPOSED SHARED DRIVEWAYS
- PROPOSED PRIMARY ACCESS
- EXISTING TREES/HEDGING
- INDICATIVE TREES
- FEATURE SQUARE
- PUBLIC OPEN SPACE & GREEN LINKAGES
- NEW PEDESTRIAN LINKS

DEVELOPABLE AREA: 2.31Ha

1:1000 0 10 20 30 50m

Date - 28.08.25  
Scale - 1:1000 @ A2  
Drawing No: AW005/MP01

\* NB. This Spatial Masterplan is based on OS and Aerial mapping only. A full assessment of the topography, trees, ecology, highways, title assessment, drainage, air quality, noise, services etc. needs to be carried out to inform the progression of this masterplan.

