

Cheshire West & Chester Local Plan

Representations on Issues & Options

Land at London Road, Davenham

Date of report: August 2025

PREPARED FOR



savills

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Document History

Issue	Date	Issued by	Comment
1.0	26.08.25	JA	First Draft for Review
2.0	26.08.2025	MD	Draft for client comment

1. Introduction

- 1.1 Savills (UK) Limited (Savills) is instructed by Northern Trust Land Limited (Northern Trust) submit representations on the Issues and Options (Regulation 18) draft of the Cheshire West and Chester Council Local Plan (New Local Plan).
- 1.2 The current Local Plan for Cheshire West and Chester (CW&C) comprises 2 parts. Part 1 sets out the strategic policies, including the housing requirement, spatial strategy, and strategic designations. This was adopted in January 2015. Part 2 sets out land allocations and detailed development management policies. These are based on the strategic framework set by Part 1. Part 2 was adopted in July 2019.
- 1.3 The Council has resolved to begin the preparation of a New Local Plan which will, upon adoption, supersede both parts of the current Local Plan.
- 1.4 The Issues and Options draft represents the first publication on the New Local Plan and the first opportunities for interested parties to comment. It is supported by Background Papers on a number of settlements within the District as well as background data on settlements.
- 1.5 However, it should be noted that there was a Call for Sites undertaken in early 2024, as well as a consultation on the evidence base that same year.
- 1.6 At the heart of the National Planning Policy Framework (NPPF) is the Presumption in Favour of Sustainable Development (Paragraph 11), which requires plans to meet the development needs of their area and sets out requirements for strategic policies.
- 1.7 These representations will focus on ensuring that the new Local Plan is drafted in accordance with the criterion set out in the NPPF and associated guidance within Planning Practice Guidance (PPG).
- 1.8 The interests of Northern Trust are set out in Section 2, however, for clarity it is seeking to promote 2.21 hectares (5.45 acres) of land at London Road, Davenham (the Site) for residential development.
- 1.9 Part of the Site is currently subject to a planning application (reference: 24/02581/FUL) for a 72-bed care home (Use Class C2). The application is submitted by Savills on behalf of joint applicants, Northern Trust (Metacre Limited) and Liberty Care Developments. This is discussed further below.
- 1.10 A Location Plan is provided at **Appendix A**.
- 1.11 The representations will be structured as follows:
 - Section 2 – Background to Northern Trust and The Site
 - Section 3 – Representations on the CW&C Local Plan Issues & Options
 - Section 4 – Summary and Conclusions

2. Background to Northern Trust and the Site

Northern Trust

- 2.1 Northern Trust is a family-owned property investment and development company based in Lancashire. The company has a track record of working with Local Authorities to regenerate sites and promote strategic land for housing and commercial developments.
- 2.2 Over the last two years, the Strategic Land arm of Northern Trust has secured planning permission for around 4,500 new homes. The company currently manages and controls more than 50 sites, with potential to bring forward more than 10,000 homes.
- 2.3 Northern Trust has an established record of working closely with landowners, developers, Councils and communities to deliver sustainable development in the UK.
- 2.4 In CW&C specifically, Northern Trust is promoting land at Neston and Christleton for residential development. Representations to the consultation are submitted separately for those locations.
- 2.5 This demonstrates Northern Trust's commitment to delivering homes to meet the identified needs for housing in the District.

The Site

- 2.6 This representation relates to an area of land comprising 2.21 hectares (5.45 acres) located off London Road to the south of Davenham on the edge of its settlement boundary.
- 2.7 Davenham is located to the south of Northwich and for the purpose of the extant Local Plan, it is included as a satellite settlement of Northwich.
- 2.8 The western site boundary is London Road and a hedgerow to the rear of properties fronting London Road. The northern boundary is a private access road, which is tree-lined. The eastern boundary is land surrounding the Davenham Hall Nursing Home and the Davenham Nursery. The southern boundary is London Road.
- 2.9 To the west of the site, the area is predominantly residential in character and to the north and east are agricultural fields.
- 2.10 The promotion land is shown in yellow at Figure 1 below and in the Location Plan at **Appendix A**.

Figure 1 – Location Plan



Site Designations

2.11 The Site is subject to the following designations, identified using currently available data.

Table 1 – Site Designations

Designation Type	Commentary
Fluvial Flooding	The Site is entirely located within Flood Zone 1, indicating the lowest probability of flooding.
Pluvial Flooding	In terms of pluvial flooding, the site is generally at very low risk, however there is a very small pocket at the centre of the site to the western edge which is at low risk of surface water flooding.
Heritage Assets	The Site lies within Davenham Conservation Area however there is no conservation area appraisal available at the time of writing. There are no listed buildings on the Site itself, but there are several in the vicinity including Davenham Hall to the south east.
Landscape	The Site does not lie in a statutory designated landscape, such as National Park or National Landscape.
Ecology	The Site does not fall within a statutory designated area in terms of ecological value.
Tree Preservation Orders	There are group and individual TPOs on the northern, western and eastern boundaries on the Site. The entire western border along London Road is flanked by mature trees, except for a gap where the access road is planned.
Public Rights of Way	There are no public rights of way that traverse the Site.

Site Context

- 2.12 The Site is approximately 350m from the village centre of Davenham and 4km from Northwich town centre (identified as Witton Street for the purposes of measuring).
- 2.13 The character of the area to the west of the Site is suburban residential development, whereas to the east of the Site the land is more rural in nature.
- 2.14 Davenham is a village with a population of 2,998 as of 2021, it is an adjoining settlement of Northwich. Davenham hosts various community amenities including a primary school, public house, theatre, and convenience shop.
- 2.15 The nearest train stations are in Northwich and Hartford offering connections to Liverpool and Manchester. There is also a bus stop immediately north west and only 88m from the Site, offering services to Northwich, Crewe and Sandbach. Therefore the Site is a highly sustainable location.
- 2.16 The Site falls within the Neighbourhood Plan area for Davenham and Wheatcroft. The Neighbourhood Plan was made in December 2017.
- 2.17 The Site is within a ‘wash-over’ designated area under Policy Strat 9 of the Local Plan (Part One) as Countryside. In these areas, development is restricted to limited developments and development that does not harm the character of the countryside.

Planning History

- 2.18 A full planning application for the erection of a 72-bed care home (Use Class C2) with access onto London Road was submitted by Savills on behalf of Liberty Care Developments and Northern Trust (Metacre Limited) in August 2024.
- 2.19 The application is attributed the reference 24/02581/FUL and is awaiting determination by the Council.
- 2.20 For clarity, the land promoted as part of this representation includes land that is subject to the planning application, as well as land immediately adjacent to the north.
- 2.21 There are no other relevant applications that have been submitted on or adjacent to the Site.

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

3.1 This section of the Representations will set out Northern Trust's position in relation to the questions posed in the Issues and Options draft. Where appropriate, reference will be made to the supporting evidence published by the Council.

3.2 It should be noted that answers are only provided to questions pertinent to Northern Trust, its expertise and interests at the Site. Questions that are not considered to be relevant are omitted.

Introduction

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

3.3 The New Local Plan must be based on up to date and robust evidence. The Issues and Options consultation document sets out the following list of additional evidence that is needed to support the new Plan:

- Retail and Town Centres Study (in preparation)
- Strategic Flood Risk Assessment (in preparation)
- Gypsy Traveller Accommodation Assessment (GTAA) (in preparation)
- Housing Needs Assessment (to be prepared)
- Green Belt Study (to be prepared)
- Infrastructure Delivery Plan (to be prepared)
- Strategic Viability Assessment (to be prepared)
- Transport Assessment (to be prepared)
- Land Availability Assessment (in preparation).

3.4 The above list of additional evidence is sufficient to inform the policies of the new Local Plan. Savills is supportive of the production of a Housing Needs Assessment, Land Availability Assessment and Green Belt Study which will inform the policies that relate to housing delivery in the new Local Plan.

3.5 It is not considered that there is additional evidence that is required that is not already in preparation or due to be prepared that would be necessary to support the new Local Plan.

IN3 – Do you have any comments or views on the proposed plan period for the new Local Plan?

3.6 National policy requires that new Local Plans should set policies for 15 years following adoption, as a minimum. It is considered that the New Local Plan period for CW&C should cover a minimum of 20 years, due to the scale of strategic development that is required to meet the current and future needs of the borough and to reflect the ambitious housing delivery targets set by Government.

3.7 A plan period of 20 years would ensure that the Local Plan is able to set the strategic policies to meet the current and future needs of the borough.

3.8 As such, the Local Plan period should be 2025 – 2045.

Vision

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?

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

Spatial Strategy

SS1 - Is there any reason for the Council not to plan for delivering a minimum of 1,914 new homes each year?

- 3.12 The Issues and Options draft sets out that the Council's policy approach is to deliver a minimum of 1,914 new homes each year over the plan period, which would equate to 28,710 new homes.
- 3.13 It is noted that the most recent local housing need figure for CW&C is actually 1,928 dpa, which brings the overall 15 year total to 28,920 homes. While this is owing to the incorporation of the latest affordability ratios.
- 3.14 In response to question SS1, the new Local Plan should support the delivery of 1,928 homes per year as a minimum. The requirement for the new Local Plan to meet the standard method figure is clearly established in the NPPF and is the necessary approach that must be taken to ensure that the plan is consistent with national policy.
- 3.15 Emphasis is placed on the fact that the national policy requirement is for Local Plans to adopt the standard method figure as a **minimum**. Savills recommends that the Council should take an ambitious approach and aim to exceed the minimum housing delivery indicated by the standard method, in order to support sustainable growth.
- 3.16 National policy provides that in some cases, authorities will be able to justify a lower housing requirement than the standard method on the basis of local constraints on land and delivery (for example designations such as National Parks etc). Such circumstances do not exist in CW&C that would justify a reduced housing requirement. For example, there are no statutory National Parks in the borough.

SS2 - 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?

- 3.17 The NPPF is clear that authorities are required to set strategic policies to meet their housing need in full across the plan period. To support the Government's objective to significantly boost the supply of homes, it is important that 'a sufficient amount and variety of land can come forward where it is needed'.

- 3.18 Paragraph 70(b) of the NPPF states that to ensure land is allocated for housing in a way that boosts the supply of homes, plans should allocate ‘a range of sites by size, type and location to meet the housing requirements of different groups in the community’.
- 3.19 A stepped housing requirement with reduced delivery in the early parts of the Plan period would, in effect, allow the Council to defer its full housing delivery to later phases of the Plan period. In areas where there are existing acute housing shortages, such as Northwich, this would prolong existing issues surrounding access to housing.
- 3.20 A stepped requirement would also ignore the opportunities for development sites that are immediately deliverable at the initial phases of the Plan period. Reduced targets in the early stages of the Plan period would risk slowing momentum, which conflicts with national housing objectives of boosting housing growth. As such, it is considered that the housing requirement should be clear and consistent throughout the Plan period, which would encourage market confidence and have a positive impact on overall housing delivery.
- 3.21 Finally, the adoption of a stepped requirement would mean that the New Local Plan would have a more limited contribution to the Government’s stated aim of delivering 1.5 million homes during the current Parliament.
- 3.22 For these reasons, the New Local Plan should not utilise a stepped requirement.

SS 4 - Do you agree with the suggested policy approach towards the spatial strategy principles, as set out in SS 3 'Spatial strategy principles' above? If not please suggest how it could be amended?

- 3.23 The Issues and Options consultation document sets out that the spatial strategy will follow the principle of directing new development and allocating land towards previously developed ('brownfield') sites within settlements first. It is acknowledged that reasonable previously developed sites within settlements can be sustainable locations to support new development, therefore development should be directed to these locations in the first instance.
- 3.24 However, it should be noted that not all brownfield land can be considered deliverable or reasonable alternatives to undeveloped sites. A detailed consideration of the deliverability and availability of each brownfield opportunity will be required to inform the urban capacity of the District.
- 3.25 The spatial strategy principles state that where there are not enough opportunities for redevelopment within urban areas and towns, the approach will be to direct development to the edge of existing settlements in locations with the best access to public transport, services and infrastructure, as the next best sustainable option. The document also states that depending on the settlement, this may require the release of land that is currently designated as Green Belt.
- 3.26 The principles of the spatial strategy as set out in the consultation document are broadly supported. It is a fundamental purpose of the Local Plan to ensure that the development needs of the District are met and that development is directed to the most appropriate and sustainable locations.
- 3.27 While a brownfield-first approach is supported and is consistent with national policy, the scale of development that is required in CW&C (i.e. at least 1,928 new homes per year), and the relative lack of appropriate previously developed sites, means it will be essential for development to be directed to other sites in sustainable locations on the edge of existing settlements. This will necessitate the release of land from the Green Belt.

SS5 - 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?

- 3.28 The Issues and Options document proposes that the New Local Plan will set out a settlement hierarchy based on the status and role of each settlement. The proposed settlement hierarchy is as follows:
- City – Chester
 - Main Towns – Ellesmere Port, Northwich, Winsford
 - Market Towns – Neston and Parkgate, Frodsham
 - Other Settlements
- 3.29 Savills agrees with the suggested settlement hierarchy as set out above. Chester is the only City within the borough and therefore performs a principal function and should be placed at the top of the settlement hierarchy.
- 3.30 The second tier of the proposed settlement hierarchy includes Ellesmere Port, Northwich and Winsford as ‘Main Towns’. The inclusion of Northwich specifically as a main town is endorsed, since it is an established settlement in the borough with clear opportunities to deliver growth and housing development. Northwich should continue to include satellite settlements, such as Davenham, for the purpose of planning policy.
- 3.31 Northwich is a desirable location for development and is able to accommodate further growth through the New Local Plan. This should be reflected in its status in the settlement hierarchy.
- 3.32 The consultation document sets out that the New Local Plan will include individual place-based policies for each settlement which will set out the vision, core features, key issues and clear strategy for what development will take place in each settlement. The place-based policy is supported in principle as this will add clarity in terms of the expectations of the Council for each settlement area.
- SS11 - Please select the option which is the most appropriate spatial strategy for Cheshire West and Chester:
- a. Option A - Retain the Green Belt
 - b. Option B - Follow current Local Plan level and distribution of development
 - c. Option C - Sustainable transport corridors
 - d. None of these
- 3.33 Land at London Road, Davenham could come forward under Options A, B or C, since it is not located in the Green Belt and is located in a sustainable location nearby to public transport options and the existing settlement of Davenham.
- 3.34 Notwithstanding that the Site can be delivered under Option A, the most appropriate spatial strategy for the District is considered to be a combination of Options B and C. Option A alone as a spatial strategy could risk discounting sustainable sites that are within the Green Belt from contributing to housing delivery which could in turn lead to a shortfall of overall housing being delivered across the District.
- 3.35 In order to ensure the Local Plan is ambitious and plans to deliver sufficient housing (i.e. a minimum of 1,982 homes per year), the Council will need to review Sites that are both within and outside of the Green Belt, which are in sustainable locations.
- 3.36 While Savills recognises the prioritisation of previously developed land for housing development, there is not a sufficient supply of available previously developed land in urban areas that is capable of accommodating the housing requirement.

SS14 - Do you feel that Option A is an appropriate spatial strategy for the new Local Plan?

- 3.37 As mentioned above, while the Site could come forward under Option A, this is not in itself considered to be an appropriate spatial strategy for the New Local Plan. The reason being is that the Council is required to meet its local housing requirement in full (being 1,928 homes per annum) as a minimum and in order to fulfil its role in setting strategic policies to meet this requirement, the New Local Plan will be required to allocate sufficient land for housing development.
- 3.38 Option A could restrict opportunities for sustainable residential development on the edge of existing settlements that are currently within the Green Belt. It is problematic as it would serve to restrict the growth of some of the most sustainable settlements and result in a pattern of development that is less sustainable.
- 3.39 There is not a sufficient supply of reasonable previously developed land that is suitable and available for housing in CW&C and as such, Green Belt sites must be assessed for their contribution to housing delivery, in accordance with the NPPF.

SS16 - Do you feel that Option B is an appropriate spatial strategy for the new Local Plan?

- 3.40 Option B follows the existing Local Plan strategy and settlement hierarchy which is set out in Policy STRAT 2 of the Local Plan (Part One). That policy locates most new development in or on the edge of 'main urban areas' and an appropriate proportion of new development on smaller settlements which have adequate services, facilities and transport connections.
- 3.41 The Issues and Options consultation document makes clear that a key difference between the adopted Local Plan (Part One) and the New Local Plan is that the current supply of previously developed land that can accommodate new development is much more limited, meaning larger areas of Green Belt and/or sites designated as Countryside are likely to be needed. The explanatory text on Option B explains that, while a proportion of development can be accommodated within existing settlements, '*much of the new development under this option would need to be located within the Green Belt and/or Countryside*'.
- 3.42 The approach set out under Option B is an appropriate spatial strategy that is entirely consistent with national policy and seeks to bring the adopted Local Plan policy up to date in respect of the spatial strategy. Option B would ensure that new development is directed to the most sustainable and logical locations in the District, which follows the established strategy in the adopted Local Plan (Part One).

SS18 - Do you feel that Option C is an appropriate spatial strategy for the new Local Plan?

- 3.43 Option C seeks to direct residential development to settlements that are served by the rail network and main bus route corridors. This strategy maximises opportunities for sustainable travel choices and could support further improvements to existing public transport services through development.
- 3.44 This Option would require land to be released from the Green Belt in locations that are well-connected by existing transport corridors.
- 3.45 Option C is a logical approach to the spatial strategy that aims to take advantage of existing settlements that are on the railway network or bus routes, as such the Option is considered to be appropriate for the New Local Plan.
- 3.46 However, the extent of development should still be guided by the level of day-to-day services that are available in the settlements. As such a blending of Options B and C would seem like a logical approach, with the potential of settlements assessed individually when allocating development.

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

- 3.47 At Paragraph 72, the NPPF makes clear that planning policies should identify ‘a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability’. To ensure the New Local Plan is consistent with the NPPF, it is critical that the Council takes into consideration the availability, suitability and economic viability of proposed housing allocation sites.
- 3.48 In terms of suitability, it is important for the Council to consider the sustainability of proposed allocation sites, in accordance with its policy approach at Policy TA 1. This includes assessing existing provision of public transport services and proximity to settlements and local centres. Locations that are detached from existing settlements or poorly connected to public transport are not sustainable and therefore are unlikely to be suitable for residential development within the new Plan period.
- 3.49 The Site at London Road, Davenham is in a sustainable location and is available and suitable for residential development. The Site will make an important and substantial contribution to the identified need for housing for older people.
- 3.50 When assessing sites for potential allocations, it will be important for the Council to ensure that allocated sites can realistically be delivered within the Plan period. As such, factors affecting deliverability of potential housing sites will be a key consideration, so technical constraints, such as ecology, flood risk and topography should all be taken into account when the Council assesses sites for potential allocations.

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

- 3.51 The Issues and Options consultation document identifies several potential ‘growth areas’ around Northwich at Map 5.6 (page 45). The significant majority of growth areas in Northwich are identified as being potential locations for housing development specifically, which is reflective of the Council’s ambitions to boost housing delivery around Northwich and the clear market demand in the settlement area.
- 3.52 One of the most suitable growth areas is NOR06, which is to the east of the existing settlement of Davenham and includes the Site being promoted by Northern Trust.
- 3.53 The Council’s proposed growth area NOR06 presents a suitable and logical expansion to Northwich that is in a sustainable location served by existing public transport and can directly address the acute need for housing in Northwich.
- 3.54 It is important that the New Local Plan includes sufficient land to enable a variety of housing types to be delivered to meet current and future needs. This includes land for housing specifically for older people.
- 3.55 At Table B.3 of the Issues and Options Document, the Council estimates that NOR06 has the capacity to deliver approximately 862 new homes. Evidently, the growth area, which includes the Site, can make a substantial contribution to the housing needs of Davenham and the wider District.
- 3.56 London Road, Davenham presents a sustainable and deliverable location within the growth area NOR06, which would ensure a sustainable pattern of development in Northwich. As such, the Site should be allocated for housing as part of the New Local Plan, either as a standalone allocation, or as part of a larger allocation covering NOR06 land.

SS 31 – Are there any constraints, including infrastructure provision that should be considered for Northwich when developing the New Local Plan?

- 3.57 Northwich is considered to be an appropriate settlement to accommodate a significant proportion of housing development in the New Local Plan. The Places Background Paper for Northwich (amended 2024) confirms that the town of Northwich and its adjoining settlements of Anderton, Barnton,

Davenham, Hartford, Lostock Gralam, Lower Marston, Lower Wincham, Rudheath and Weaverham combine to form the third largest urban area in the District.

- 3.58 The initial outcomes of the Stage One LAA also conclude that Northwich has the most available land out of any of the urban areas in the District to accommodate housing. This should be reflected in the New Local Plan.

Northwich

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?

- 3.59 The Issues and Options document proposes that the policy approach to Northwich will reflect the objectives of the Northwich Town Centre Development Framework and Northwich Transport Strategy. The Council's intention is to retain the overall policy content of the current Local Plan (Part One) Policy STRAT 5 and Local Plan (Part Two) Policy N1 relating to development in Northwich and safeguarding the character and individuality of the settlements that form the wider built-up area of Northwich.
- 3.60 The New Local Plan will set out the level and location of new development within Northwich and the settlements which make up the Northwich urban area, including Davenham. The new Plan will identify key sites and land allocations to deliver strategic development needs for new housing.
- 3.61 The initial key allocations/policies identified in the Issues and Options consultation document are:
- Wincham Urban Village
 - Northwich Town Centre e.g. Weaver Square, Northwich Market, Barons Quarry
 - Winnington Works (TATA)
 - Gadbrook Park
- 3.62 The Issues and Options document states that other sites to be identified will depend on the selected Option for the Spatial Strategy (A, B or C).
- 3.63 The element of the NO 1 Policy that seeks to identify key sites and allocations for housing development in Northwich is supported. As stated above, Northwich will play a primary role in accommodating new housing development in the New Plan period and directing this development to a mix and variety of sites as part of the Northwich policy is essential to ensure delivery.
- NO 2 – Do you have any comments on the suggested key allocations / sites?
- 3.64 It is recommended that the Site to at London Road, Davenham is included in the New Local Plan as a residential allocation in Northwich since it is suitable and available for the development of housing. This could be either as part of a wider allocation covering all of NOR06, or as a standalone allocation.
- 3.65 Some of the proposed 'key allocations' listed under NO 1 as part of the Issues and Options document are large-scale strategic housing allocations (e.g. Winnington Works). It is important that in the New Plan, policy for Northwich includes a variety of housing allocations of different scales to ensure that the projected housing sites are realistic and implementable within the Plan period.
- NO 5 – Should the settlements that make up the wider Northwich urban area be retained?
- 3.66 The Local Plan (Part One) defines Northwich (under Policy STRAT 5) as 'the town of Northwich and adjacent settlements of Anderton, Barton, Davenham, Hartford, Lostock Gralam, Lower Wincham, Rudheath and Weaverham.' The settlements surrounding Northwich town, including Davenham, make a significant contribution to the character of Northwich as a whole.

- 3.67 In the context of housing delivery, the settlements surrounding Northwich town will play a key role in contributing to the variety of homes that are needed in Northwich. As such, those settlements should be retained as part of Northwich in the relevant policy of the New Local Plan.

Transport and Accessibility

TA1 - 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?

- 3.68 The Issues and Options consultation draft sets out that the Councils overall approach to transport is to minimise the need for travel, particularly by single-occupancy cars and vans, by locating development so it is accessible to local services and facilities by a range of transport modes. The draft document sets out a sustainable transport hierarchy, which is as follows:

- People walking or wheeling
- People cycling or riding
- People using public Transport
- People driving ultra-low emission and shared vehicles
- Delivery and logistics in internal combustion engine vehicles
- People driving other private motor vehicles.

- 3.69 In terms of new development, the draft Local Plan document sets out that new development will be encourages in more sustainable locations. This means that developments should maximise opportunities for people to be able to meet day-to-day needs within a reasonable (10 minute/ 800 metre) walking distance of their homes, as well as being able to travel outside of their settlements by a range of sustainable transport choices.

- 3.70 In response to question TA 1, the Council's suggested policy approach towards transport and accessibility is broadly supported. The element of the draft policy that encourages new development in sustainable locations that benefit from existing connections to sustainable transport modes is particularly supported, since these locations can make a significant contribution to sustainable development.

- 3.71 The land at London Road, Davenham is in a sustainable location that is consistent with the key principles of the draft policy TA 1. The Site is in very close proximity to 'Fountain Lane' bus stops on London Road, which are served by regular '31' and '37' services between Crewe and Northwich.

Infrastructure and Developer Contributions

ID1 - Do you agree with the suggested policy approach towards infrastructure and developer contributions, as set out above in ID 1 'Infrastructure and developer contributions'? If not please suggest how it could be amended.

- 3.72 The NPPF states at Paragraph 35 that Plans should set out the contributions expected from development. At the same paragraph, the NPPF makes clear that such policies should not undermine the deliverability of the plan.

- 3.73 Savills broadly supports the proposed infrastructure and developer contributions policy under section ID1. However, the Issues and Options draft states that the policy approach will clarify that where infrastructure is needed to sustain a new development, off-site contributions may not be acceptable. This approach is questioned as it could fail to take due consideration of smaller sites that are constrained and therefore may not be able to deliver necessary infrastructure on-site. In these circumstances, off site contributions are a way of mitigating the impacts of development through financial contributions, established under a legal agreement tied to a planning permission.

ID2 - Should developer contributions only apply to major developments? How should 'major development' be defined?

- 3.74 Developer contributions should only apply to major developments. It is suggested that the definition of 'major development' should be consistent with the definition given in the NPPF, as this will aid clarity and consistency between local and national policy.
- 3.75 The NPPF explicitly states that for housing, major development relates to development where ten or more homes will be provided, or the Site has an area of 0.5 hectares or more.

ID3 - Do you agree that developers/ operators should pay the full cost of infrastructure required to deliver their sites?

- 3.76 In the case of housing development, financial contributions can be secured by S106 agreements in order to enable the provision of new site-specific infrastructure, or upgrade existing site specific infrastructure, required to make development acceptable in planning terms.
- 3.77 These contributions are supplemented by CIL contributions towards non-site specific infrastructure.
- 3.78 In this sense, developers already pay the full cost of the infrastructure required to deliver new homes.

ID4 - In the event of viability being an issue how could the new Local Plan prioritise the provision of infrastructure across the borough and/ or on a settlement-by-settlement basis?

- 3.79 It is considered that site specific infrastructure that is essential for delivery should be prioritised. This may require a reduction in affordable housing contributions, or flexibility in affordable tenure mix, to enable this to happen.

Housing

HO1 - Do you agree with the suggested policy approach towards mix and type and specialist housing in new developments, as set out in HO 1 'Mix and type of housing in new developments and specialist housing' above? If not please suggest how it could be amended?

- 3.80 The Issues and Options draft document states that the new policy approach will provide detailed requirements for various types and proportions of housing. It is important that the New Local Plan is not overly restrictive as it must allow flexibility to enable sites to come forward that can deliver a range of house sizes in different proportions that reflect both need and market demand.
- 3.81 Until the Housing Needs Assessment is updated, comments cannot be made in relation to the housing mix policy details. In terms of specialist and accessible housing (M4(2) / M4(3) the proportion of homes that meet these standards should reflect the evidence. This is not likely to require that all homes meet these standards as a blanket requirement.

HO2 - Should the housing mix and type and specialist housing be delivered through a percentage policy approach that sets requirements for each category of housing?

- 3.82 It is important that the policy approach to housing mix taken in the New Local Plan provides for a mix of different types and sizes of housing to come forward to meet the diverse housing needs of the District. It is appropriate that the housing mix policy should be informed by an up to date Housing Needs Assessment. Until that Assessment is complete, comments on the details of the policy cannot be made.
- 3.83 A percentage policy approach would appear to be a logical approach. However, such percentages would need to be reflective of a robust evidence base.
- 3.84 It should be noted however that policies in the New Local Plan must take a flexible approach that takes into consideration site-specific factors. There should be flexibility built into the policy to not

restrict housing development from coming forward where sites can make an important contribution to the overall housing delivery in the Borough.

HO4 - 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?

- 3.85 The draft Issues and Options document sets out the policy approach to be taken in the New Local Plan in relation to affordable housing at section HO2. The approach will reflect the government's requirement for housing development in the Green Belt to provide at least 50% affordable housing, whether land has been released from the Green Belt through a housing allocation, or an application.
- 3.86 Affordable housing will be required on all sites of 10 or more dwellings apart from in designated rural areas, where the threshold will be three or more dwellings.
- 3.87 The general policy approach towards securing affordable housing is supported in principle. As above, it is important that the detailed policy includes sufficient flexibility and takes into consideration site specific factors, such as ground contamination, that could impact viability.
- 3.88 The Council should take a pragmatic approach that enables a sufficient supply of affordable housing to come forward as part of housing developments, while taking into account the potential for viability challenges on some sites which may influence the provision of affordable housing.
- 3.89 This is particularly the case in terms of affordable housing tenures with an increased percentage of affordable home ownership and intermediate tenures, particularly where the golden rules in relation to Green Belt release apply.

Health and Wellbeing

HW1 - Do you agree with the suggested policy approach towards health and wellbeing, as set out in HW1 'Health and wellbeing' above? If not, please suggest how it could be amended?

- 3.90 High quality developments can make a positive impact on health and wellbeing. Likewise, developments that are poor quality can give rise to adverse impacts on health and quality of life.
- 3.91 The Issues and Options draft sets out the Council's policy approach to health and wellbeing and confirms that where it is considered likely that a proposal will result in significant environmental effects during the construction phase, a Construction Environmental Management Plan (CEMP) will be required.
- 3.92 The document states that proposals should aim to promote access to green space across the borough that widen and strengthen the boroughs cultural, sport, recreation and leisure offer.
- 3.93 The Council's approach to health and wellbeing is supported.

HW3 - Should we consider reviewing the separation distances between facing windows of main habitable rooms, as set out in current Local Plan (Part Two) policy DM 2 Impact on residential amenity, and include them in a policy in the new Local Plan?

- 3.94 In response to question HW3, while the importance of providing high quality residential amenity is supported, it is important that any policy that prescribes separation distances allows flexibility to consider site-specific factors.
- 3.95 Rigid design standards, such as separation distances, can limit site capacity and reduce density. Local variations in separation distance policies also create uncertainty and inconsistency for developers.

- 3.96 As such, any design policy, including those related to separation distances should include flexibility to ensure development is context-specific while ensuring a high standard of residential amenity.

HW4 - What is an appropriate quantity of outdoor amenity space to be provided in new developments? What approach should we apply to apartments/flats?

- 3.97 The New Local Plan should set out a recommended quantity for outdoor amenity space, however it is important that the relevant policy takes due consideration of other existing and future outdoor amenity spaces that are accessible.
- 3.98 The open space policy should be flexible to allow constrained sites that are suitable for housing to come forward and contribute to open space via contributions or off site provisions.

Open Space, Sport, Recreation and Community Facilities

OS1 - Do you agree with the suggested policy approach towards open space, sport and recreation, as set out in OS 1 'Open space, sport and recreation' above? If not please suggest how it could be amended?

- 3.99 The Issues and Options consultation document sets out the Council's policy approach to open space, sport and recreation. The broad approach aims to protect, manage and enhance existing open spaces and facilities. This policy approach is broadly supported and is consistent with the NPPF.
- 3.100 The draft policy text states that open space provision in new developments should be sought in the following order: on site, off-site, as a financial contribution. It is important that any policy takes into account new development on sites that cannot accommodate open space provision onsite, and in these circumstances, off-site provision or financial contributions are reasonable alternatives.
- 3.101 In terms of recreational routeways, the draft policy wording states that proposals that enhance public access and the recreation value of the recreational routeway network will be supported. Savills support this element of the policy and that the routeway network will be identified on the policies map. However it will be important that the routeway policy is applied in a flexible manner insofar that it does not prohibit sustainable residential development from being delivered.

OS2 - Are the current thresholds for developer contributions for open space and playing pitches suitable, or do you have any comments or suggestions for what they should be?

- 3.102 The thresholds for developer contributions for open space are detailed in the CW&C Council Developer Contributions Technical Guidance Note. That document sets out the onsite and financial contributions required for 'amenity greenspace', 'play children', play youth', 'allotment', 'parks and recreation' depending on the proposed number of residential units.
- 3.103 For proposed developments of 10 or fewer units, no contributions are due, which is an appropriate policy approach. For proposed developments of more than 10 units, there are various onsite and off-site requirements depending on the size of the proposals.
- 3.104 The broad approach is supported, however it is important that the policy is applied with sufficient flexibility to enable homes to come forward in sustainable locations. The importance of providing physical and financial contributions to open recreational spaces is acknowledged, however the scale of housing need in CW&C is such that the policy must take a pragmatic approach and prioritise sustainable housing delivery.

OS3 - Is the current evidence sufficient or does it require updating (Open Space Study and Playing Pitch Strategy)?

- 3.105 The Council's Playing Pitch Strategy (PPS) was originally produced in 2021 and has since been updated in February 2025. A PPS is said to have a lifespan of three years, although this can be increased if it is kept up to date. Since it has been updated earlier this year, the PPS does not currently require an update, however it should be reviewed annually to ensure it is accurate.

Landscape

LA1 - Do you agree with the suggested policy approach towards landscape, as set out in LA 1 'Landscape' above? If not please suggest how it could be amended?

- 3.106 The consultation document sets out at LA 1 that policies should protect and wherever possible enhance landscape character and local distinctiveness.

- 3.107 Savills agrees with this policy approach.

LS2 - Should the key settlement gaps currently defined in Local Plan (Part Two) policy GBC 3 be reviewed? Could they be expanded, and/or should new key settlement gaps be identified in the Green Belt, or other areas to help protect the character of settlements?

- 3.108 In response to question LS2 above, the key settlement gaps should be reviewed in light of the current local housing need, which is a minimum of 1,928 new homes per year. As discussed above, for the Council to make sufficient land available to deliver the required homes, some land will need to be released from the Green Belt. This may include land that is currently defined in Local Plan (Part Two) Policy GBC 3 as a key settlement gap.

- 3.109 On the basis that the Council is required to make enough land available to meet its local housing need in full within the Plan period, the key settlement gaps should be reviewed to ensure the policy does not restrict sustainable residential development from coming forward. This approach would be consistent with the NPPF where it requires local authorities to meet local housing needs in full and to review Green Belt boundaries where necessary.

Green Infrastructure, Biodiversity, and Geodiversity

GI2 - Should new development contribute to woodland in Cheshire West and Chester? 5. Is a 2:1 ratio enough for a tree replacement policy?

- 3.110 At GI 1, the Issues and Options consultation document sets out the policy approach towards Green Infrastructure, Biodiversity and Geodiversity. In response to the tree planting ratio specifically, the 2:1 proposed ratio is appropriate and would significantly increase the overall number of trees in the District. An increased requirement for tree replacement would place a substantial cost on developers which can reduce developer confidence and in turn the rate of development.

- 3.111 There should be flexibility built into this policy to ensure that if there are site specific reasons why a large number of trees need to be removed, this can be accommodated without an unrealistic replacement programme.

GI3 - Should new Local Plan policy go above the 10% mandatory biodiversity net gain set nationally?

- 3.112 The mandatory requirement for certain developments to deliver a minimum 10% net gain in biodiversity is provided by the Environment Act 2021.

- 3.113 Savills consider that the New Local Plan should reflect the 10% requirement and not increase the requirement beyond this. It should be noted that the statutory requirement is for a minimum of 10% net gain to be provided as such, depending on the site specific constraints, viability and other factors, the legislation is designed to set the 10% as a minimum.

- 3.114 If the Local Plan adopted a policy requirement above the 10% mandatory requirement, this could risk reducing the number of homes that can be delivered, since an additional cost would be placed on developers, which could impact the viability of potential housing developments. The viability assessment supporting the New Local Plan would have to consider the financial implications of this.
- 3.115 The New Local Plan should reflect the national mandatory requirement of a minimum of 10% net gain.

Design and Sustainable Construction

DS1 - Do you agree with the suggested policy approach towards high quality design, as set out in DS1 'High quality design' above? If not please suggest how it could be amended?

- 3.116 At DS 1, the Issues and Options Consultation document sets out that the New Local Plan will promote sustainable, high quality design and construction.
- 3.117 Savills broadly supports the approach to design policy, particularly in relation to making the best use of high quality materials and reducing the opportunity for crime and disorder, and the fear of crime.
- 3.118 While the broad policy approach is supported, the New Local Plan should ensure that policies relating to design are flexible and take into account site characteristics.
- 3.119 With regards to Nationally Described Space Standards (NDSS) it should be noted that these can only be introduced where there is a clear need and the introduction of the Standards would not impact development viability. The Council will need to demonstrate robust justifiable evidence to introduce the NDSS.
- 3.120 It should also be noted that well-designed homes that are below NDSS provide high quality, functional homes, which are appropriate for various budgets. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.

DS2 - If the Council produces a borough-wide Design Code, should this form part of the new Local Plan?

- 3.121 In response to question DS2, if the Council produces a borough-wide Design Code, this should inform the New Local Plan so that design policies are consistent and evidence-based.
- 3.122 Design policy that is clear and consistent and informed by a borough-wide Design Code will help inform development proposals for major development and will add clarity to what is expected of developments in terms of design. This will in turn increase developer confidence, which will have a positive influence on development.

DS6 - Do you think that the new Local Plan should set a higher local standard beyond the building regulations requirements to achieve net zero carbon in all new developments?

- 3.123 Northern Trust acknowledges the importance of advancing energy efficiency through a nationally consistent set of standards and a timetable that is universally understood and technically feasible. This aligns with the Written Ministerial Statement of December 2023 (WMS), which states that the Government does not expect plan-makers to set local energy efficiency standards for buildings that exceed current or planned building regulations.
- 3.124 The WMS clearly indicates that any planning policies proposing local energy efficiency standards for buildings that go beyond current or planned building regulations should be rejected at examination if they lack a well-reasoned and robustly costed rationale. This rationale must ensure that development remains viable and considers the impact on housing supply and affordability in accordance with the NPPF. Additionally, any extra requirements should be expressed as a

percentage uplift of a dwelling's Target Emissions Rate (TER), calculated using a specified version of the Standard Assessment Procedure (SAP).

- 3.125 Therefore, if the Council wishes to pursue this policy, it should use the TER and ensure that they have a well-reasoned and robustly costed rationale that fully considers viability and the potential impact of the policy on housing supply and affordability.

4. Summary and Conclusion

- 4.1 Savills is instructed by Northern Trust to make representations on the Issues and Options draft of the New Local Plan for Cheshire West and Chester.
- 4.2 Northern Trust has interests at London Road, Davenham, which it is promoting for allocation for housing (care home) within the New Local Plan. These representations make reference to this land in order to illustrate wider points in relation to the production of the new Local Plan.
- 4.3 Northern Trust is supportive of the Council's decision to prepare a new Local Plan and welcomes the opportunity to engage with this, and future consultations.
- 4.4 In general the Council is encouraged to be ambitious. This is both in terms of addressing the current housing crisis and moving towards carbon neutrality.
- 4.5 In terms of housing specifically, much of this is dependent on ensuring the right requirement, apportioning this housing to the right general locations, and ensuring that the most sustainable sites are allocated for delivery. These representations have stated a suitable course for the new Local Plan to follow.
- 4.6 The land at London Road, Davenham represents an excellent opportunity to deliver high-quality housing, including specialist housing for older people and those with dementia, in an appropriate and highly sustainable location.

Appendix A Location Plan

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